

P A P E R
RECYCLING
COALITION

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October 19, 2010

Document Control Office
Mail Code 7407M
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

**RE: Docket Identification Number EPA-HQ-OPPT-2010-0768, EPA's
Role in Advancing Sustainable Products, 75 Federal Register 56528,
September 16, 2010**

Dear Sir/Madam:

The Paper Recycling Coalition represents the interests of the 100% recycled paperboard and containerboard companies in North America. It is critically important to this industry that environmental product claims be accurate and completely verifiable, otherwise consumers will lose confidence in legitimate green marketing claims. The use in products of terms like 'sustainable' can cause significant confusion in the market place unless there is a clear understanding of its meaning.

We support the efforts of the Environmental Protection Agency (EPA) to engage in this issue, but we strongly urge EPA to carefully review and take into consideration the work that has been done by other Federal agencies, the NGO community, and by international standards setting organizations.

We believe that EPA cannot determine its own role without understanding the wide range of interpretations of the term 'sustainable' as it relates to products. There are thousands of different definitions and interpretations of what is a sustainable product.

A quick internet search, where there were over 300,000 hits, illustrates this point with a mere five definitions:

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- sustainable products are those products providing environmental, social and economic benefits while protecting public health, welfare, and environment over their full commercial cycle, from the extraction of raw materials to final disposition.¹
- a sustainable product is one which protects the environment during its entire life. That is, from the moment the raw materials are extracted from the source to the time the final product is disposed of, there must be no permanent damage caused to the environment.²
- [a sustainable product is] made to last indefinitely and have the least negative effects on environmental health. Sustainable materials in clothing are easily recycled and/or last a long time.³
- [sustainable] products providing environmental, social and economic benefits while protecting public health, welfare, and environment over their full commercial cycle, from the extraction of raw materials to final disposition.⁴
- sustainable products can be defined as those products that generate greater positive or lower negative social, environmental and economic impacts along the value chain from producer to end user than conventional products.⁵

The recently released proposed Green Guides by the Federal Trade Commission (FTC) states that “consumer perception evidence indicates that the claim has no single environmental meaning to a significant number of consumers or that it conveys non-environmental characteristics (e.g. durable or long-lasting).” This conclusion was reached after three years of studying the issue. They therefore determined that they were “unable to provide specific advice on sustainable as an environmental marketing claim.”⁶ Yet we see that claim being made every day.

EPA has over twenty years of experience in single attribute product analysis (the Comprehensive Procurement Guidelines, Energy Star, etc.), but little experience in determining which attribute has the greatest (or least) impact.

¹ <http://www.sustainableproducts.com/susproddef.html>

² <http://www.sustainableproductsite.com/>

³ www.asicentral.com/asp/open/content/content.aspx

⁴ www.changinggears.ca/articles/education_for_life/ed07.html

⁵ <http://www.iied.org/pubs/pdfs/G01075.pdf>

⁶ <http://www.ftc.gov/os/fedreg/2010/october/101006greenguidesfrn.pdf> p. 127

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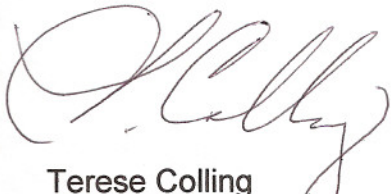
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Since the issue of 'sustainable products' must involve trade-offs, we believe that EPA needs to be fully engaged in this issue along with other departments and agencies of the federal government. In addition to the Federal government, the NGO and international community, and the standards setting community must be jointly engaged in this issue if EPA is to make a meaningful contribution to the development, manufacture, designation and use of sustainable products.

Thank you for allowing us to participate in this important discussion. We remain willing to assist you in any way necessary.

Sincerely,



Terese Colling
Washington Representative



Fran McPoland
Washington Representative