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The American Center for Life Cycle Assessment (ACLCA) is pleased to provide these comments on EPA's role in advancing sustainable products. ACLCA is the professional society for Life Cycle Assessment (LCA) in the U.S., and LCA is the science of measuring the environmental sustainability of products and services. LCAs are holistic yardsticks of environmental performance. ACLCA's membership crosses the range of LCA practitioners in the country: academia, consultants, industry, governments and non-governmental organizations are all represented.

As the lead agency addressing environmental issues within the federal government, EPA has a pivotal role in moving the entire economy towards more sustainable approaches. In the past, much of that work was accomplished through command and control strategies, but as the most egregious environmental issues have become addressed through enforcement, the role of voluntary measures has risen, and this has been reflected in EPA's increasing activities in voluntary programs over the last two decades.

We are now at a critical time where the opportunity to make use of the science of LCA to make more rational decisions has come to the fore. Environmental product declarations (EPDs) are becoming a global requirement, whether they are only carbon footprint analyses or a comprehensive list of environmental impact categories. These ecolabels provide several opportunities where EPA can lead to overcome barriers to adoption of more sustainable approaches to the US consumption and production practices.

The biggest policy challenge in the field of LCA lie in adoption of LCA as the underlying thought process for environmental policy in the US. US environmental legislation created Stovepipes for different environmental media and issues. As a result, environmental regulations are optimized on single issues rather than on a holistic approach to environmental management. LCA provides a better model to analyze and predict issues, but historical practice provides great barriers to implementing LCA and life cycle thinking. The U.S. needs clear policy direction that is based on LCA. Such an approach would be rational, comprehensive, have really measurable environmental outcomes and would be less expensive than the current patchwork of legislation.

The biggest research challenge for LCA lies in the lack of life cycle inventory data. Most of the efforts in the US on this topic have come from the national laboratories, and have been of benefit only to LCA practitioners. The audience for LCI data is very large, encompassing policy-makers, educators, and the general public. We need to have data that is complete, current, transparent, available to the layperson and public.

EPA has great convening power.

- It can bring together federal agencies to develop public life cycle inventory databases to support LCA practice across the country.
- It can organize the combined cross-agency purchasing power to demand that EPDs be developed and used for selling products and services to the government. This could include piloting purchasing programs based on EPDs.

- It can work with the states and local jurisdictions to achieve acceptance of EPDs and the LCA thought process at the state and local level.
- It can lead the development of government-wide policies for publication of LCI data collected using federal funds in federal public databases.

EPA has experience in environmental labeling—its energy star program is becoming a global model. The virtue of this model is that it is based on a statistical evaluation of the entire market of particular product groups, setting the certification bar high, and then as the market moves, re-setting the bar for better energy performance. EPDs could be treated the same way, with EPA providing the multi-factor component bar high enough that it can move the market for a given product group. To accomplish this goal, EPA and other federal entities would have to invest in long-term studies of EPDs of key products.

The logic of life cycle assessment is that it measures outcomes, and products can be compared by the environmental outcomes they cause. Therefore, we do not believe that “criteria” for sustainable products would be a valuable exercise for EPA to engage in. This is the job of the many Type I ecolabel organizations that already exist.

LCA can be used in identifying the “hotspots” in a product chain. We believe that this exercise is best performed inside companies, who can then take steps to ameliorate those impacts. On the other hand, LCA clearly identifies tradeoffs, a key need for green chemistry efforts. EPA can integrate LCA into its green chemistry program to good end.

EPA is poorly situated for identifying the scientific basis of ecolabels. The research budget of EPA is very small compared to other government agencies such as NSF, DOE, DOD and NIH. We suggest that instead, EPA partner with these agencies to have their funding priorities reflect the needs of ecolabels.

We wish to thank you for the opportunity to comment on these topics so important to the life cycle community we represent and to the future environmental health of the U.S. and the world.

Respectfully submitted,

A handwritten signature in cursive script that reads "Rita C. Schenck".

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