



August 15, 2008

Federal Trade Commission/Office of the Secretary
600 Pennsylvania Avenue, N.W.
Room H-135 (Annex B)
Washington, DC 20580

Secretary Clark,

Thank you for the opportunity to comment on the “Green Guides” for environmental marketing. We believe that updating these guides is essential in the marketplace. In brief, AZS Consulting offers the following:

- ✓ Green certification programs, test methods and procedures need to be aligned with the building codes, requiring the same independence, oversight and substantiation as do the certification programs accepted by the building codes.
- ✓ The responsibility ultimately lays with each individual building products industry to figure out how to fairly substantiate any claim, not just environmental ones. It is often messy, expensive and time consuming. Such is a consensus driven process. But that process is a proven, well-established one with numerous venues, such as the American Society for Testing and Materials (ASTM), American National Standards Institute (ANSI) or, International Organization for Standardization (ISO). These three organizations indeed provide the foundation from which all other standards, procedures, methods and certification spring. Participation varies from merely reference their materials to full-blown accreditation by one of these organizations. Nevertheless, the most reliably substantiated and quantified claims are rooted in the principles of these organizations to one degree or another. The FTC should ensure that ‘green’ claims participate and adhere to these recognized conventions, including:
 - ➔ Transparency in development, execution and review
 - ➔ Established periodic review of standards, methods and programs
 - ➔ Consensus and/or open public comment during review
- ✓ For certification and seals, our firm believes that the Guides’ should have more direct procedures and requirements for specificity and substantiation by the manufacturer, builder or green organization. There are a number of sites on the web

(and growing daily) that state they have a green program but when you look into the programs, the metric they are using for substantiation is either absent or questionable. Furthermore there is confusion among independent, first, second or third party claims. Many programs purporting to be third party programs do not appear to have the quality assurance checks for true independence. These must be established with clarity. The ubiquitous 'certification' issued after only sitting through a two hour lecture or submitting a single sample ten years ago must be curtailed.

Thank you again for the ability to comment on the FTC Green Guides. FTC involvement is essential to curtail erroneous claims that are flooding the marketplace. We believe the above recommendations will go a long way to ensuring that a scientifically-based, fairly-developed "green" infrastructure for products is allowed to develop.

Sincerely,

Arlene Z. Stewart
President

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