BEFORE THE
Federal Trade Commission

In Re:
"Green Building and Textiles Workshop – Comment,
Project No. P084203"

COMMENTS OF
THE CONSTRUCTION SPECIFICATIONS INSTITUTE

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COMMENTS OF
THE CONSTRUCTION SPECIFICATIONS INSTITUTE
ON EXAMINING DEVELOPMENTS IN GREEN BUILDING AND TEXTILE
CLAIMS AND CONSUMER PERCEPTION OF SUCH CLAIMS
FOR USE IN THE FTC GUIDES OF ENVIRONMENTAL MARKETING CLAIMS

The Construction Specifications Institute, hereafter referred to as CSI, has observed that inconsistencies exist in how green and/or sustainable building product attributes are being reported. This has caused considerable confusion as to what constitutes a green or sustainable building product or attribute. The confusion has been exacerbated by a growing number of green building rating systems/programs that call for reporting of single sustainable product attributes as a basis for receiving points and credits. In addition, various third party certification programs have been developed to verify a product's sustainable attributes such as (but not limited to) VOC's (Volatile Organic Compounds), recycled content, and recyclabilty.

Design firms attempting to sort through the clutter of information on manufacturer's websites and seeking greater clarification from manufacturers on sustainable product attributes have further complicated the situation by not having a standardized way to request or report information about products. This inefficient practice wastes time on the part of designers to individually develop product information questionnaires and on the part of manufacturers to respond to individual firm questionnaires. And it produces inconsistent and non-comparable information.

CSI is a national professional member society whose mission includes creating standards, formats and practice guidelines to improve construction documents and project delivery. The organization is unique in the industry in that its members are a cross section of specifiers, architects, engineers, contractors, building materials suppliers and consumers. In response to the confusion of what constitutes a sustainable/green building product and to assist in the evaluation, specification and purchase of sustainable/green building products, CSI has developed *GreenFormat*.

GreenFormat allows manufacturers to accurately report the sustainability-measuring properties of their products, and provide designers, constructors and building operators with basic information to help meet 'green' requirements. The significance of CSI's *GreenFormat* over individual designer questionnaires is that it references specific industry standards wherever possible as well as providing for individual manufacturer input. The verification of sustainable claims by relating questions to standards and certifications benefits both manufacturers and designers. For manufacturers who are faced with a myriad of sustainable questionnaires, the direct link between question and verification gives them a clearer understanding of the intent of the questions. For

designers, having that substantiation and verification means less concern about wading through potential "green-wash" and misleading information.

Sustainable information reported in *GreenFormat* is grouped into five broad categories. The broad categories are divided into sub-categories. Individual topics and questions concerning sustainability are included within these sub-categories. The structure is flexible to keep up with anticipated changes. As sustainability issues evolve within the construction industry, new topics and questions can be added in the appropriate category and subcategory, and existing topics and questions which become obsolete or change can be dropped. The structure can be applied to all construction products and product categories. The categories are:

1. Background Information – general fields used to categorize the information by *MasterFormat* number, manufacturer's name, product name or trade name (with a manufacturer's brief description of the product), and date the information is provided.
2. Product Details - This section addresses the four different methods of specifying - reference standard, performance, descriptive and proprietary by capturing explicit information on compliance with standards and certifications, product performance and product composition.
3. Product Lifecycle - describes the additional phases of a construction material's life cycle (Extraction and Transportation; Manufacturing; Construction; Operations; and Deconstruction/Recycling) which a design professional evaluates when selecting a sustainable product It is not an attempt to collect all the information necessary to perform a life cycle analysis of a product, but only to categorize the most important and most commonly asked sustainability questions that relate to a product's entire lifespan. These are generally recognized categories used by the sustainability community.
4. Additional Information – allows manufacturers to provide any additional information about their company's environmental policy or programs, other environmental groups that also list their products, or other environmental information they want to share. This category relates to the transparency of the information provided.
5. Authorization – self-declaration by an official agent of the company that the information provided by the manufacturer is true and correct and has the company's official endorsement behind it.

It should be noted that these data fields are intended to evolve as market requirements change.

The development of *GreenFormat* (www.greenformat.com) has two distinct focuses. The first focus has been the content and organization of the format and the corresponding functionality of the database and web interface to capture the information manufacturers can report on sustainable product attributes. The second focus of the development is the population of the system with the product data designers need. Users of *GreenFormat* will be able to search and access to this information in multiple ways including CSI *MasterFormat* numbers and product names. In the future, product attributes (such as

recycled content) and other properties will be supported by search capability. The data reported by manufacturer's addresses product compliance with various standards, rating system credits, certification and labeling programs. The referenced standards and programs will be linked to websites where additional information can be accessed to help the user understand how to consider the reported information in conjunction with established criteria for sustainable design.

GreenFormat is a self-reporting system for product information, ISO 14021 guidelines are referred as the basis of responsible data reporting. The scope of ISO-14021, Environmental Labels and Declarations - self-declared environmental claims (Type II environmental labeling) includes specific requirements for self-declared environmental claims including statements, symbols and graphics regarding products. This is explained to users by way of linked information.

GreenFormat also intends to comply with data requirements found in ASTM E2129 – Standard Practice for Data Collection for Sustainability Assessment of Building Products.

GreenFormat is provided as a public access tool for product data. It is not a green building product certification or third party assessment or rating tool. It is presented as a format to consistently report manufacturer's sustainable product information. This information can be considered by a user for specification or purchase of a product. *GreenFormat* could also be considered as reference in other green product evaluation tools. *GreenFormat* is intended to be a "live" reference with ongoing updates as the industry requires.

CSI is being assisted in the development of *GreenFormat* by the Charles Pankow Foundation (www.pankowfoundation.org) and Building Green, LLC (www.buildinggreen.com) CSI welcomes feedback on *GreenFormat*.