

RE: Comments on behalf of Interface, Inc on Proposed Revisions to Federal Trade Commission's Green Guides. Project #P954501

As a global manufacturer of modular and broadloom carpet products, Interface Inc. submits the following comment on the proposed revisions to the Green Guides. We appreciate the ability to comment on the proposed revisions and applaud the reorganization and simplifications proposed. We believe the proposed revisions will enable greater access and use of the Guides.

In particular we have comments on the proposed revisions to the Guides in the following areas:

Section 260.4 – General Environmental Benefit Claims

We agree with the FTC that the Guides should strengthen the guidance in relation to general environmental benefit claims – and agree that the proposed changes as drafted will provide better guidance.

Substantiating General Environmental Benefit Claims – Life Cycle Considerations

We agree with the FTC that it is currently not appropriate to require that life cycle assessment (LCA) be used to substantiate green marketing claims for products (see page 34 Proposed Guides) at present. However, we do think that the FTC could make a positive step related to LCA that would decrease confusing and misleading claims that cite or evoke LCA or LCA data.

The FTC has several options in how to do this, but we suggest that the FTC provide some minimum guidelines for how LCA data can be used to market products, including the type of data that must be disclosed as well as a requirement to provide context where products are being marketed using LCA data. This could be as simple as a statement about the fact that LCA was used, the scope of the LCA and whether or not it was third party verified.

The issue of how to credibly disclose and present LCA environmental impact data related to products has recently taken a significant step forward with the growing use of Environmental Product Declarations (EPDs). While we do not advocate that the FTC require EPDs as the standard format to disclose LCA environmental data at this time, we do think this is a potential solution in the long term. In this way, a potential longer term solution would be for the Guides to state that if LCA environmental impact data is to be declared it should be done through an ISO14025 Type III EPD for verified credibility.

Section 260.11 Recyclable Claims

In relation to using the term "recyclable" to market products, we agree with the decision to clarify access to programs and product collection by defining the substantial majority with the recommendation to set this at 60%.

Section 260.12 Recycled Content Claims

In terms of the recycled content claims and the calculation methodology used, we agree with the FTC that using a weighted average methodology can lead to misleading claims. We suggest the FTC eventually evolve towards a per product calculation methodology, as this will provide much greater transparency to consumers about the particular product they are buying. At a minimum, the FTC should require companies making recyclable claims to disclose whether or not the recycled content was calculated on a per product basis or on a weighted average basis.

Sustainability Claims

We agree with the FTC that the term "sustainable" should not be allowed to be used in product marketing to describe or define a particular product.

In addition to the guidance on General Environmental Benefit claims provided, we believe that the terms "Sustainability" and "Sustainable" are ready for guidance at least in the business to business marketing arena, which is more sophisticated in use of these terms already, and we

believe is already associating sustainability claims with the environment. While we accept the findings of the research that consumers today do not find these terms to refer to the environment, we further believe that this level of confusion in the consumer arena could be reduced if minimum guidelines were in place – i.e. guidelines, along with proper usage by marketers, could actually help to educate consumers.

If consideration is given to providing guidance in this area, we would propose that the use of sustainability claims in reference to a certain product be discouraged, instead reserving the terms for use in referencing overall company goals. Companies can strive towards a goal of sustainability, but products should not be claiming to be "sustainable." Without guidance, this area remains gray, e.g. leaving room for claims about products instead of companies in both the consumer and business arenas.