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Office of Management and Budget
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Re: Proposed OFPP Policy Letter

BIFMA International offers the following comments on the Proposed OFPP Policy Letter announced in the Federal Register of December 28, 2007 (Volume 72, Number 248).

The proposed Office of Management and Budget (OMB) policy letter outlining agency responsibilities for acquiring environmentally friendly products and services should also assist agencies in the purchasing process by determining reputable sources of information. The office furniture industry, in cooperation with numerous other stakeholders, has worked for two years to develop a Sustainability Assessment Standard (SAS) for business and institutional furniture products. We undertook that effort in large part to help end users sort through the growing morass of "green products" in the marketplace.

We anticipate the BIFMA SAS will likely become an ANSI Standard sometime in 2008 and it may be a tool for federal purchasing officials evaluating business and institutional furniture. Our process has been an open, consensus-based one with many stakeholders including representatives from the Environmental Protection Agency and General Services Administration; state governments; the architectural and design community; academia; and NGO's. Usage in government sales scenarios is something we invite you to consider. The most recent draft of our standard is available online at <http://bifma.org/public/SusFurnStd.html>.

Identification of green products and services should be attempted using credible standards, where they exist, so that purchasing officials know the available options have been well thought out in an open process such as the one endorsed by the American National Standards Institute. It is a real challenge to address the complex array of environmental factors going into the production of any product today. To not provide all federal agencies with the tools and direction needed to make wise choices would be to unleash a wave of "greenwashing" confusion within government rather than having government lead the nation by example in this area.

On a separate note, we see that the proposed policy letter instructs agencies to "first consider mandatory and preferred sources to obtain green products and services". While it is true that the FAR still lists Federal Prison Industries' UNICOR program as a mandatory source, agencies have been free for several years now to go to competitive bid if the prison made product does not meet their needs. Annual language in the Defense Authorization Bill has essentially rendered UNICOR's mandatory source requirement defunct. It would be clearer if the phrase "mandatory and" were removed from the description of that program when it is cited for agencies since it is not compulsory.

Sincerely,

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