



February 26, 2008

By Email: OFPPGreen@omb.eop.gov
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Office of Federal Procurement Policy
Office of Management and Budget
Room 9013, 725 17th Street, NW
Washington, DC 20503

RE: Comments on Proposed OFPP Policy Letter

On behalf of the Office Furniture Dealers Alliance (OFDA), I am pleased to submit these comments regarding OFPP's proposed policy letter on Acquisition of Green Products and Services, as published in the Federal Register on December 28, 2007 (72 FR 73904-09).

OFDA is a trade association that represents and serves independent commercial office furniture dealers and connects them with their primary industry business partners in the United States. OFDA and its members are actively working in collaboration with other industry and general business groups to promote increased awareness and use of environmentally sound products and services in our own industry and through business our members conduct with their customers.

There are two elements of the OFPP's proposed policy letter that are of particular interest to OFDA and its members: 1) general language in the draft policy letter stating that mandatory source preferences will be given to Federal Prison Industries (FPI); and 2) the information sources and review processes federal agencies will use to evaluate which products and services are environmentally preferable.

FPI Mandatory Source Preference

OMB's proposed policy letter directs agencies to "first consider mandatory and preferred sources to obtain green products and services." Although FPI's UNICOR program is still identified in the Federal Acquisition Regulation (FAR) as a "mandatory source," for several years annual Defense Authorization bill language has substantially reduced the practical application of this mandate. In general agencies have been and remain free to seek competitive bids and make "best value" procurement decisions when FPI products do not meet their needs.

For this reason, OFDA urges OFPP to remove the unqualified reference to FPI as a "mandatory source" in its proposed policy letter.

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Evaluation of "Green" Products and Services

In addition, OFDA believes it is essential that federal agencies have access to and are trained to consistently apply reliable, scientifically based information and industry-recognized performance standards and definitions when making comparisons and purchasing decisions based on the degree to which specific products and services are "environmentally preferable."

The Association and its members strongly support the intent of the proposed policy guidance and see great overall opportunities and societal benefits resulting from it. However, federal agencies will encounter a confusing variety of conflicting voluntary standards, testing protocols, and certifications, as well as many scientifically unsubstantiated claims of environmental "friendliness" as they make major purchasing decisions.

There also are instances in which certain processed materials that are part of end-products with overall environmentally desirable features, cannot be easily substituted and are not recyclable to the degree expected in federal government standards. Examples include roll-forming products made of aluminum and steel.

For these reasons, with respect to procurement of office furniture, we believe federal agencies should be given OMB guidance to base procurement decisions – to the maximum extent possible – on a "best value" approach that incorporates industry recognized and/or ANSI-approved product standards, testing protocols and certification systems. One example is the BIFMA Sustainability Assessment Standard, which is now moving through the final stages of the rigorous, consensus-based, ANSI review process.

For similar reasons, OFDA believes that "automatic product substitutions," which are referenced in the proposed OFPP policy letter, should be kept to a minimum in the absence of recent and specific prior federal agency determinations of environmental preference for particular products or services based on such consensus-based performance standards.

OFDA appreciates the opportunity to comment on OFPP's proposed policy letter on Acquisition of Green Products and Services. Questions regarding this comment may be directed to me at 703/549-9040, x 100 (cbates@ofdanet.org).

Sincerely,

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