U.S. General Services Administration
Office of Governmentwide Acquisition Policy
Attn: Ms. Jennifer Hawes, Procurement Analyst
Email: jennifer.hawes@gsa.gov

Re: FAR Case 2021-016
Federal Acquisition Regulation: Minimizing the Risk of Climate Change in Federal Acquisitions

The Polyisocyanurate Insulation Manufacturers Association (PIMA) appreciates the opportunity to comment on the advance notice of proposed rulemaking for the Federal Acquisition Regulation: Minimizing the Risk of Climate Change in Federal Acquisitions (Docket No. FAR-2021-016-0001). PIMA represents North American manufacturers of laminated polyisocyanurate insulation board products (polyiso insulation). Our members include Atlas Roofing Corporation, Carlisle Construction Materials, Firestone Building Products, GAF, Johns Manville, IKO Industries, Rmax, and Soprema. These manufacturers account for the majority of polyiso insulation produced for North America.

Responses to select questions as presented in the advance notice of proposed rulemaking are provided below:

(a) How can greenhouse gas emissions, including the social cost of greenhouse gases, best be qualitatively and quantitatively considered in Federal procurement decisions, both domestic and overseas? How might this vary across different sectors?

Greenhouse gas emissions for building products can be quantified at various levels using life cycle assessment methodologies that consider impacts across the different stages of a product's life span – production (including raw material sourcing and transportation), construction (including transport to the site), use and end of life. The results of life cycle assessments are commonly reported using Environmental Product Declarations that attempt to standardize how the environmental impacts of a particular building product category are reported. The availability of Environmental Product Declarations may vary based on the sector. For certain categories of building products like thermal insulation, the environmental benefits from the use phase (e.g., reduced building energy use) should also be considered where the benefits result in reduced greenhouse gas emissions over the product's useful service life.
(b) What are usable and respected methodologies for measuring the greenhouse gases emissions over the lifecycle of the products procured or leased, or of the services performed?

For the building products sector, life cycle assessments are conducted by experts in the field in accordance with industry accepted standards. It is important to note that life cycle assessments can be influenced by the particular practices of the life cycle assessment expert and/or the information provided to, or collected by, the practitioner. Environmental Product Declarations are prepared in accordance with industry-recognized Product Category Rules and ISO Standards (in particular, ISO 14025:2006 Environmental labels and declarations – Type III environmental declarations – Principles and procedures). For the building thermal insulation industry, the following standards guide the development of these resources: Product Category Rules for Building-Related Products and Services Part A: Life Cycle Assessment Calculation Rules and Report Requirements (UL 10010, Version 3.2), and Product Category Rule (PCR) Guidance for Building-Related Products and Services Part B: Building Thermal Insulation EPD Requirements (UL10010-1, Version 2.0), ISO 14040, ISO 14044 and ISO 21930.

(d) How would (or how does) your organization provide greenhouse gas emission data for proposals and/or contract performance?

PIMA makes information available on greenhouse gas emission data for various polyisocyanurate products by publishing and maintaining third-party verified, ISO-compliant Environmental Product Declarations. The resources are available to the public here: https://www.polyiso.org/page/EPDs. The industry-averaged Environmental Product Declarations are a public resource that can be used to identify environmental impact information associated with the specification and use of polyisocyanurate products. Additionally, product-specific Environmental Product Declarations may be published by individual product manufacturers.

(e) How might the Federal Government best standardize greenhouse gas emission reporting methods? How might the Government verify greenhouse gas emissions reports?

With respect to the building products sector, independent, third-party organizations already develop and maintain standardized methodologies for measuring and reporting the environmental impacts (including greenhouse gas emissions) associated with the various life cycle stages of building products. The Federal Government should ensure that it uses Environmental Product Declarations for building products that are prepared in accordance with these recognized methodologies. Attention should be paid to ensure that reports are prepared in accordance with the latest versions of the methodologies, as these standards are frequently reviewed and updated. Additionally, not all Environmental Product Declarations are equal. For example, Environmental Product Declarations can be prepared to cover various life cycle stages – cradle-to-gate or cradle-to-grave (the latter being a more complete analysis of a product’s full life cycle impacts). The reported results will vary based on the life cycle stages considered. Furthermore, Environmental Product Declarations are prepared based on life cycle assessments that consider various inputs and assumptions. These inputs and assumptions can vary between products within the same category, which can also influence the reported results.
This variability is inherent in the existing processes and methodologies for measuring and reporting the environmental impacts of building products.

(f) How might the Federal Government give preference to bids and proposals from suppliers, both domestic and overseas, to achieve reductions in greenhouse gas emissions most effectively?

For the building products category, the Federal Government should give preference to products covered by Environmental Product Declarations prepared in accordance with industry-recognized standards. This preference would send a strong signal to building product suppliers that measuring and reporting environmental impacts is an important factor in the building material selection process. However, caution should be exercised by the Federal Government in setting any arbitrary requirements or cutoffs for greenhouse gas emissions on a product-by-product basis. Project teams require flexibility and discretion to select building products that best meet the full performance requirements of a particular building project. Prioritizing the selection of the lowest greenhouse gas emitting product at the exclusion of other performance parameters may increase the risk of regrettable substitutions.

Questions
For questions or for more information, please contact Justin Koscher (jkoscher@pima.org; 703-224-2289).

Sincerely,

Justin Koscher, President
Polyisocyanurate Insulation Manufacturers Association