The Polyisocyanurate Insulation Manufacturers Association (PIMA) appreciates the opportunity to submit the following comments in response to the Federal Trade Commission’s (FTC or Commission) request for public comment on the Guides for the Use of Environmental Marketing Claims (Green Guides). PIMA is the trade association for North American polyisocyanurate insulation manufacturers – a product used in commercial and residential building construction to improve energy efficiency and reduce environmental impacts from building operations.

In general, the Green Guides provide valuable guidance to building product manufacturers on how to appropriately market the environmental benefits and attributes of their products. This guidance is particularly useful as the construction industry becomes increasingly aware of the environmental impacts of building operations and building products, and as companies and industries explore strategies for reducing these impacts.

In response to the FTC’s Question 12 “Sustainable,” PIMA encourages the Commission to revisit its previous determination that it lacked a sufficient basis to give specific guidance on sustainable claims. Over the past decade, the life cycle assessment (LCA) practice has made great strides forward. The ability for industries and manufacturers to measure the environmental impacts of products across all life cycle stages is now widely available. Each year, new product category rules have been developed or updated, which provide consensus-based rules for how environmental impacts should be measured and reported for discrete product categories. Standardized, third-party reviewed environmental product declaration (EPD) reports – developed in accordance with the applicable product category rule – are available for a significant (and growing) number of industries and products. These reports provide consumers with a standardized look at the environmental impacts of products within specific product classes.

Given the advancements in the LCA and EPD fields, we believe the Commission now has a sufficient basis to give guidance on sustainable claims. At minimum, we encourage the Commission to update the Green Guides to recognize that third-party LCA and EPD reports prepared in accordance with the applicable industry standards provide an appropriate basis for environmental claims. By recognizing these information sources within the Green Guides, the
FTC will provide certainty to marketers. In turn, this will likely encourage continued investments in developing LCAs and EPD reports for more and more products – an outcome the Commission should welcome.

PIMA looks forward to engaging with the Commission as it continues to collect public input on the Green Guides in upcoming stakeholder workshops. Please contact me (jkoscher@pima.org; (703) 224-2289) should additional information be helpful to the review process.

Sincerely,

Justin Koscher
President