



American Center for Life Cycle Assessment
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Federal Trade Commission
Office of the Secretary
Room H-135 (Annex J)
600 Pennsylvania Avenue, NW
Washington, DC 20580

Re: Proposed, Revised Green Guides, 16 CFR Part 260, Project No.P954501

Dear Sir or Madam:

The American Center for Life Cycle Assessment (ACLCA) is the professional society for life cycle assessment (LCA) in the U.S. We are pleased to have the opportunity to comment on the *Proposed Revision to the Green Guides*. LCA is the science of measuring the environmental performance of products and services. There are international standards on how to perform LCA studies (the ISO 14040 series). Our membership is very interested in assuring that appropriate guidance is given to manufacturers so that their marketing claims are backed by the best available science.

Over the past few years, the use of LCA in marketing has grown world-wide. For example, carbon footprints of products (a kind of life cycle assessment) have been produced for thousands of products, and Executive Order 13514 has directed that the federal government develop a plan to require carbon footprints of all the products it buys. The General Services Administration is even now working to develop a plan to implement that executive order.

The Energy Independence and Security Act requires that the federal government give preference to bio-based fuels over petroleum-based fuels in the case where the bio-based fuel has a lower carbon footprint over its life cycle. EPA's Office of Solid Waste also uses LCA as part of its policy development.

In France, environmental product declarations (the ecolabel based on LCA) are required by law, with implementation being phased in starting in mid-2011. The rest of the EU is expected to follow suit.

We note that "the Commission declines to propose advising marketers either to conduct an LCA to substantiate environmental claims or to follow a particular LCA methodology."

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We agree that it is not the role of FTC to be making technical decisions about how LCAs should be conducted, but it is clear that LCA is being used by both the US government and by other governments as the basis of market claims of greenness. The failure of the draft revision to recognize the role of life cycle science seems to us to be a great missed opportunity to assure that products with green claims are actually providing an environmental benefit.

At the very least, LCA provides unparalleled benefits in documenting the environmental performance of products. The company that has performed an LCA of their products shows that they have taken a holistic approach to their environmental concerns, and has documentation of how well or poorly their product fares. If the Green guides would mention this fact, it would provide some guidance for documentation of green claims.

At the other end of the spectrum, a fully developed national environmental product declaration program (like the one envisaged by the French government) would disclose the environmental performance of products to the consumer in much the same fashion as a nutrition label, putting accurate and complete information into the hands of the public.

The practice in this field is developing rapidly. For example, product category rules are the mechanism whereby ambiguity in LCA marketing practice is removed through an open consensus process. ACLCA just announced the opening of the National Product Category Rule Repository, which is aimed at developing U.S. capacity for EPDs, and ASTM-International has accepted ACLCA's proposed guidance on Product Category Rule Operators as a new work item. The work of developing product category rules will fundamentally change the face of LCA as a marketing tool.

LCA supports a primary goal of the Green Guides: that consumer's perceptions align with the actual "greenness" of the products. A placeholder in the upcoming Green Guides, followed up in a year or two with clearer guidance on the use of LCA in green claims would serve the public well. We at ACLCA stand by to assist the Commission in whatever way possible to help fulfill the promise of LCA for marketing.

Respectfully submitted,

Advisory Council of the American Center for Life Cycle Assessment

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