government purchasers, this guidance will have to be broadly distributed, easily understandable, and supplemented by education and training for government purchases on the environmental implications of their purchasers as well as tools to improve their purchasing performance.

their purchasing performance.

The proposed guidance is intended, like the NPR, to promote a government that "works better and costs less." It will work better by reducing its negative impacts on the environment and ensuring productive, sustainable natural systems. And it will cost less by incorporating environmental considerations into its decisions (in this case, purchasing decisions) and, from a fiscal as well as an environmental standpoint, operating its facilities and programs more efficiently. <sup>2</sup>

To help Executive agencies move forward in acquiring environmentally preferable products, and to help in the further development of the tools and knowledge base to support this initiative, EPA is recommending that voluntary pilot projects be undertaken by Executive agencies. EPA believes that these pilot acquisitions will serve as the "laboratories" for applying this proposed guidance, helping to test the workability of the concepts presented and providing valuable information that can be used to improve the guidance in the future. The proposed guidance includes a more detailed discussion of the pilots.

EPA believes that this proposed guidance provides the first step in bringing forward the key issues surrounding the acquisition of environmentally preferable products, allowing Executive agencies to make the necessary choices more effectively. This proposed general guidance, however, will not answer many of the questions which may arise in acquisition of a particular product category or service, and thus is not intended for use by individual procurement officials. Instead, EPA envisions that the results of the pilot acquisitions will more closely address the needs of the acquisition community. However, EPA believes that this guidance will nonetheless, inform procurement officials interested in making decisions involving environmental preferability.

EPA intends this proposed guidance to serve as a broad framework for acquisitions involving environmentally preferable products or services. Following the issuance of this broad, umbrella guidance, EPA intends to issue more specific guidance on certain product categories. Product categories could include not just common supplies but also services, facilities and/or systems. Which product categories will be the subject of specific guidance will depend upon the plans of the individual Executive agencies and on comments that are solicited from the public. EPA plans to use a public process to develop the product category-specific guidances, so as to draw on the extensive knowledge from both within and outside of the government.

### III. Request for Comment

EPA request comments on all aspects of this proposed guidance and is interested in receiving comments as they relate to the following sections in this unit.

#### A. General Framework

• Will the framework suggested in the guidance be effective in promoting federal purchase of environmentally preferable products and expand public sector markets for these goods and services? How might it be improved?

## B. Guiding Principles

- The proposed guidance presents seven guiding principles. Combined, do these seven principles convey the multidimensional and dynamic nature of environmental preferability? Are these the principles that Executive agencies should follow? Are all of these principles appropriate or of equal importance to Executive agencies? What are the best ways to operationalize these principles so that they are easy for procurement officials to use in identifying and giving preference to environmentally preferable products and services?
- In collaboration with other Executive agencies, EPA plans to test out many of the concepts contained in the guiding principles through pilot acquisitions focused on specific product categories. EPA seeks comments on ways that can best facilitate operationalizing the concepts in the guidance through pilot acquisitions and other approaches and which will result in practical, user-friendly tools.
- The proposed guidance promotes a life-cycle perspective to determining environmental preferability. EPA seeks comments on the best and least burdensome ways to encourage reporting of life-cycle information and to embark on practical life-cycle approaches. Is it possible to determine some minimum level of life-cycle information that is necessary to reasonably evaluate environmental preferability of a product or service?

What is this minimum level? The government's need for any information needs to be weighed against the burden on vendors of providing, and consumers interpreting, that information.

 The concept of multiple attributes has been presented as a separate principle (Principle #2) from the concept of life-cycle perspective (Principle #3). EPA seeks comments on whether some combination of attributes can determine a product's overall environmental performance or whether such a determination can only be made after assessing the environmental effects during the product's life-cycle. If the latter is more appropriate, EPA seeks comments on whether these two principles should be merged into a single principle so that attributes associated with products are always viewed in the context of a life-cycle perspective.

#### C. Proposed Menu of Environmental Performance Characteristics

 As part of the guidance, EPA proposes to offer a preliminary list of attributes that can serve as a starting point for presenting and comparing environmental information of products and services. This menu of environmental performance characteristics is attached to the guidance as Appendix B(1). Are these the right set of attributes? What should be added or deleted? Should the list include exposure factors associated with the materials, e.g., potential for exposure (low/high likelihood), number of people exposed, duration of exposure, magnitude of exposure, length of time until exposure, number of acres exposed, number of species exposed, etc? If so, how should these exposure factors be defined? How should the environmental attributes be characterized, i.e., in terms of environmental releases or effects, risks to human health and the environment, or some other characterization? Who should be involved in narrowing down the list of attributes to determine environmental preferability for a specific product category?

# D. Establishing Core Environmental Values

Deciding whether one product is more environmentally preferable than another inevitably involves judgements that one environmental impact or environmental stressor is more important than another. The EPA believes that it is appropriate and important to establish a possible framework for a discussion of environmental priorities, and recognizes that there are various ways in which the government may establish

<sup>&</sup>lt;sup>2</sup> From ''Creating a Government That Works Better and Costs Less: Reinventing Environmental Management,'' page 2.