purchased and the legal requirements applicable for a particular acquisition.

This guidance includes two tools to assist Executive agency personnel in evaluating attribute claims or "eco-labels" that appear on products. First, a summary of the Federal Trade Commission's (FTC) "Guides for Use of Environmental Marketing Terms," appears as Appendix D. Second, EPA proposes to include a discussion of characteristics for third party environmental certification programs in the guidance as Appendix F. Executive agency decisions regarding federal procurement, including those involving the environmental preferability of products, are considered to be an inherent government function, therefore the EPA believes that Executive agencies should not make decisions regarding the environmental preferability of products based on third party environmental certification programs that do not generally meet certain characteristics. EPA has requested comment on this proposed Appendix.

III. Executive Agency Implementation

This section recommends steps that each agency can take to implement the environmentally preferable provisions of Executive Order 12873.

A. Policy Directive and Affirmative Procurement Plans

Recognizing that effective implementation will require clear direction and support from the top levels of the agency, it is recommended that each Executive agency issue a Policy Directive that promotes the purchase of environmentally preferable products and services. Elements in the policy directive should include:

An overall statement of policy:

- Agency personnel should seek to reduce the environmental damages associated with their purchases by increasing their purchase of environmentally preferable products and services to the extent feasible, taking into account other considerations such as performance, health and safety issues and price.
- Environmental factors should be taken into account as early as possible in the acquisition planning and decision-making process.
 - A commitment to the following:
- Increase the acquisition of environmentally preferable products and services.⁵
- Identification of voluntary pilot projects (see discussion below).
- Establishment of incentive and award programs to recognize those people, teams, and interagency work groups who are most successful at promoting the purchase of environmentally preferable products. 6

Collaboration among agencies to provide education and training is highly encouraged.

In order to minimize the burden on Executive agencies, EPA recommends that provisions of the Policy Directive to promote environmentally preferable products be incorporated into individual agency's Affirmative Procurement Plans. ⁷ This can be done as agencies revise their Plans.

B. Pilot Projects

The discussion in Section II.B. identified seven principles which are key to promoting the purchase of environmentally preferable products. To encourage Executive agencies to move forward in acquiring environmentally preferable products and to further develop the infrastructure and knowledge base to support this initiative, EPA is recommending that voluntary pilot projects be undertaken by Executive agencies.

The pilot acquisitions will be the "laboratories" for applying the principles, will help test their workability, and through the results of the pilots, provide actual "lessons learned" as well as improved or more effective policy for future acquisitions. For each of the pilots, a product category specific guidance (PCSG) or "users guide" aimed at the acquisition community will be developed. EPA will seek involvement of established commodity sources, such as the General Service Administration (GSA) and the Defense Logistics Agency (DLA), who have experience and expertise concerning their respective commodities in the pilot projects. EPA plans to keep track of projects that are planned or already underway and thereby serve as a focal point for information on government-wide activities related to environmentally preferable products. Information about different pilots will be disseminated among the agencies to avoid any duplication of efforts and to ensure that lessons learned in one pilot project can be shared to inform other pilot projects.

The discussion below further describes how these pilots and demonstration projects might work. Figure 2 illustrates this process.

- 1. Selection of pilots. Selection of pilots acquisitions is at the discretion of individual Executive agencies. Criteria that agencies should consider in selecting pilots include:
- Potential for a reduction in risk to human health and the environment.
- Feasibility/degree of flexibility in the acquisition.
- Products or services that are representative or typical of the procurement system; this maximizes the potential value of the pilot acquisition in providing lessons as to the effectiveness of the guidance as well as future acquisitions.
- 2. Short-term implementation. There are several demonstration projects that are

incentives, provide guidance and coordinate appropriate educational programs for agency employees."

already in the planning or implementation stages that illustrate how to promote the purchase of environmentally preferable products. These include:

GSA/EPA Cleaning Products Pilot

In 1993 at the request of GSA, EPA began developing environmental performance criteria that would help identify "green" cleaning products. Stakeholder meetings were held to develop the criteria, and a study was undertaken to look at product efficacy and the relationship between product performance and environmental impact. Using the results of these efforts, GSA's Federal Supply Service is developing a solicitation for a multiple award schedule that will convey from vendors to federal consumers information on attributes of cleaning products that can serve as indicators of environmental impacts. This information will then be available to purchasers for their examination when selecting products. As part of this pilot, EPA will examine the information provided on the "environmentally preferable cleaning products" schedule and will select cleaning products for EPA facilities.

GSA/EPA Computer Pilot

Computer hardware accounts for approximately \$4.6 billion in purchases by the Federal government annually. Currently, the Federal government has been successful in purchasing energy efficient Energy Star computers which have resulted in significant environmental benefits and cost savings. Using its purchasing power, the Federal government can and, in the case of Energy Star, has stimulated product manufacturers to make environmental improvements. EPA and GSA, in collaboration with computer manufacturers and others, are seeking to expand the Energy Star model to identify additional attributes that can be used in the acquisition of environmentally preferable computers.

Current Sources for Products With Environmental Attributes

Executive agencies have the option of acquisition products through various supply sources available from GSA and DLA. GSA's Multiple Award schedules (MAS) are one such source of supply. With recent modifications, these schedules offer to purchasers some information on the environmental performance of products. GSA also currently publishes an Environmental Products Guide which identifies those products which vendors have associated with an environmental claim and a New Item Introductory Schedule that often includes information on the environmental performance of products.8 While agencies should consider purchasing items from this Guide, they should be aware that often the claims refer to a single environmental attribute (e.g., recycled content) and are not verified by GSA. GSA is planning to enlist EPA's assistance in implementing a demonstration project that will involve expanding these publications to include

⁵This is pursuant to section 602. "Goal for Increasing the Procurement of Recycled and Other Environmentally Preferable Products," which states "Agencies shall strive to increase the procurement of products that are environmentally preferable or that are made with recovered materials and set annual goals to maximize the number of recycled products purchased, relative to non-recycled alternatives."

⁶This is pursuant to section 302(b)(2) of the Executive Order that states that Agency Environmental Executives shall "establish

⁷ Under section 6002 of the Resource
Conservation and Recovery Act of 1976, procuring
agencies are required to establish affirmative
procurement programs for purchasing EPAdesignated recycled products. EPA recommends
that agencies expand the scope of their affirmative
procurement programs to include other
environmentally preferable products.

⁸ Other catalogs of supply include GSA's Supply Catalog and DLA's Energy Efficient Lighting Catalog.