



ENVIRONMENTALLY PREFERABLE PURCHASING (EPP)

Providing Buyers, Catalogers and Item Specialists

The Information Busy People Need to Keep Current

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Comprehensive Procurement Guidelines (CPG)

There is no change in status for CPG IV or CPG V from last month's report.

Biobased Products

The Federal Register Notice codifying the requirements of the 2003 Farm Bill, has been delayed and is not expected until sometime after the new year. Watch for further updates.

Meeting of Joint Group on Environmental Attributes

DLA Headquarters (DSS-E) has called a Joint Group on Environmental Attributes meeting for December 18th. The issues reported in this newsletter will be discussed. Look for email announcing time, place and agenda.

Potential New Attributes

DLA Headquarters (DSS-E) has commissioned a study to screen 8 potential new environmental attributes. This month's newsletter provides a summary of the reports on 7 of them.

Potential New Potential Environmental Attributes

DLA Headquarters (DSS-E) has commissioned a study to screen 8 potential environmental attributes. To become a DLA attribute, three conditions must be met: a policy priority; a clear definition; and life cycle cost savings. Here are summaries for 7 of the attributes.

Rechargeable Batteries

Is there a policy priority? The Battery Act of 1996 phases out mercury in batteries, establishes disposition requirements for batteries regulated by the Act and creates a labeling requirement for rechargeable batteries. The Universal Waste rules regulate disposal of some batteries. In addition, thirty states require recycling lead-containing batteries.

Is there a clear definition? The Universal Waste Rule and the Battery Act each define batteries, but slightly differently. The Battery Act explicitly exempts certain types of batteries that would fall within the definition contained in the Universal Waste regulation. Specifically, it exempts lead acid batteries used in vehicles or in power production systems, backup or uninterruptible power batteries for electronic systems and rechargeable alkaline batteries.

Is there a life cycle savings? Cost differentials between one time use batteries and rechargeable batteries depend on many variables. But typically, the cost per duty cycle for rechargeable batteries is significantly less than their one time only counterparts.

Persistent Bio-Accumulative Toxic Pollutant (PBT) Alternatives

Is there a policy priority? Reporting usage and emissions of PBTs is required under the Emergency Planning and Community Right to Know Act (EPCRA) and its Toxic Release Inventory (TRI) program. The Pollution Prevention Act of 1990 requires PBT users to report techniques they used to identify source reduction opportunities. EPA's PBT rule lists 19 compounds that must be reported. EPA has a Multimedia Strategy for PBTs designed to reduce exposure. Other programs also cover specific PBTs, such as EPA's Mercury Action Plan.

Is there a clear definition? Several different programs within EPA have published their own lists. For example, they have a list of 12 high-priority PBTs, a waste minimization list of 30 PBTs, and a list of 19 PBTs regulated under the Toxics Release Inventory program. Further, since most of the compounds are not themselves end products, but constituents of products, concentration thresholds must be defined for specific products or product categories..

Is there a life cycle savings? Avoiding PBTs reduces health care costs and environmental compliance and cleanup costs. Because PBTs are used in a wide range of products and uses, comprehensive cost data is indeterminable. Developing product specific cost data is likely possible, but not generally available. Most cost data currently available is anecdotal.

Environmentally Preferable Packaging

Is there a policy priority? There are no packaging-specific federal policies, but packaging is within the general scope of Executive Order 13101, "Greening the Government through Waste Prevention, Recycling." The Navy has some specific packaging programs to address the problem of solid waste management on board ship, specifically Waste Reduction Afloat Protects the Sea (WRAPS) and Plastic Removal in Marine Environment (PRIME). These programs fulfill U.S. obligations under the International Sea Convention for the Prevention of Pollution from Ships (MARPOL Protocol).

Is there a clear definition? EPA, the EU and Canada are working to develop a definition of environmentally preferable packaging, but to date there appears to be no working definition. Industry Codes of Practice and characteristics of environmentally preferable packaging have been developed, however. One option could be to use the recycled content for some types of packaging, but there is currently no workable definition.

Is there a life cycle savings? Benefits such as reduced number of shopping trips for larger packages and reduced disposal costs for less packaging are apparent, but have not been quantified except anecdotally. No comprehensive cost-benefit analyses are available.

Organic Food

Is there a policy priority? The U.S. Department of Agriculture has developed the National Organic Program (NOP), which establishes national standards for the production and handling of organically produced products. There is no national policy to move consumers or federal procurement toward purchasing organic food over conventional food.

Is there a clear definition? USDA regulations define 3 categories of organic food: "100 percent organic", "organic", and "made with organic ingredients." There are currently 13 state and 36 private certification programs operating in the U.S. that certify food that complies with the USDA requirements to be labeled organic.

Is there a life cycle savings? Benefits fall into two broad categories: health and environmental. Regarding the health benefits, the USDA "makes no claims that organically produced food is safer or more nutritious than conventionally produced food." Non-governmental organizations and a variety of research groups dispute this, citing studies showing increased levels of disease fighting nutrients in organic foods. However, the positive health effects from avoiding the use for hazardous chemicals for food production is more definitive. The EPA estimates that there are 10,000 to 20,000 cases of acute pesticide poisonings nationwide among agricultural workers, due mostly to insecticides.

In addition, according to the EPA agriculture is responsible for significant water, air and ground pollution; with farming for 70% of waterway pollution in the country. Retail price premiums for organic foods average 10% to 30% higher than for conventional foods. There is no comprehensive cost-benefit analysis addressing all these issues for organic food.

Ozone Depleting Substances (ODS)

Is there a policy priority? The Montreal Protocol requires the phaseout of ozone depleting substances worldwide. The timeline differs in developed and developing countries, and differs by Class of ODS. In the U.S., the Clean Air Act implements the treaty. Ozone depleting substances have been proven with scientific certainty to destroy the earth's protective ozone layer, leading to significant implications for human health and the environment. Products using or containing Class I ODS can no longer be purchased in the U.S., except for limited essential uses approved by the Montreal Protocol. A number of product categories using or containing Class II ODS are available, and will continue to be until 2030. In some cases, purchase decisions could be made solely based on the use of ODS. In most cases, purchase decisions should be driven by other factors.

Is there a clear definition? Numerical values are assigned to specific substances by the Montreal Protocol based on their effectiveness at destroying stratospheric ozone. They are clear, published and definitive.

Is there a life cycle savings? Cost benefit analyses were performed prior to promulgation of the final rule on the Protection of Stratospheric Ozone. It found no significant economic impact and a regulatory impact analysis was not required. Life cycle cost comparisons between ODS and non-ODS products depend on product category, and sometimes specific installations. For some product categories ODS offers no cost benefit, in others it is neutral, and in others non-ODS products may cost less.

Mercury Free

Is there a policy priority? Mercury waste is regulated under the Resource Conservation and Recovery Act (RCRA), the Hazardous Waste Identification Regulations, the Universal Waste Regulations, and Land Disposal Restrictions (LDR) Regulations. The EPA has designated mercury as a Persistent, Bio-Accumulative Toxic (PBT) Pollutant. As of 2001, 18 states and Congress had introduced legislation further regulating mercury. A number of initiatives addressing industry-wide or product specific uses of mercury are ongoing, such as the National Institutes of Health Campaign for a Mercury Free NIH, the Hospitals for a Healthy Environment, the Chlor-alkali industry and the automotive industry.

Is there a clear definition? There are three terms used to define the mercury containing status of products: "mercury free", "mercury-containing", and "mercury-added." Some states use concentration specific values to define mercury containing. The National Institutes of Health approach is to qualitatively address unnecessary uses of mercury. Mercury is deliberately added to some products during manufacture and concentrations can vary widely, even between manufacturers of equivalent products.

Is there a life cycle savings? Non-mercury products typically cost more initially than their mercury-containing counterparts. But many mercury containing products, such as batteries, are classified as hazardous waste and incur significant handling and disposal costs at the end of the product life. Studies quantifying costs and benefits for some product categories are available.

Chlorine Free

Is there a policy priority? Chlorine is widely used by the paper and pulp industry to bleach paper products. These processes release chlorinated organic compounds, such as dioxins, which are known human carcinogens and highly toxic to aquatic life. EPA regulates air emissions and water discharge from the pulp and paper industry under the Pulp and Paper Cluster Rule; and encourages it to eliminate chlorine use through the Voluntary Advanced Technology Incentives Program. The American Public Health Association and Michigan State Medical Society have called for a progressive reduction and ultimate elimination of chlorine from the industry.

Is there a clear definition? The industry has developed three definitions:

Totally Chlorine Free uses no chlorinated bleaching agents to bleach the pulp, eliminating chlorinated pollutants in the wastewater stream. But to achieve this, paper must be made from 100% virgin fiber TCF pulp, since the chlorine content of recycled fibers is unknown.

Processed Chlorine Free (sometimes known as Processed Chlorine Free) paper is made from recycled fiber that has not been rebleached with any chlorine based bleach.

Elemental Chlorine Free replaces chlorine with chlorine derivatives, such as chlorine dioxide, as a bleaching agent. It still results in the production and release of chlorinated pollutants, including dioxins, but at a somewhat reduced level.

Paper that meets the definitions is sold with either a ECF, PCF or TCF label.

Is there a life cycle savings? Producers using chlorine-free processes report significantly reduced water and maintenance costs. Health benefits result from reduced exposure to dioxins, a known carcinogen. The cost differential between traditional and chlorine free paper varies, but in some cases there is no differential.