



GC³ Green Chemistry &
Commerce Council

February 1, 2007

Steve Johnson, Administrator
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Dear Mr. Johnson,

We, the members of the Green Chemistry and Commerce Council (GC3), write today to encourage you to fully support financially the U.S. EPA's Design for the Environment Program (DfE). The DfE Program is uniquely suited to help accelerate progress in sustainability by working with industry sectors including chemical manufacturers, formulators and chemical users – a huge segment of industry. DfE's distinctive qualifications are based partly on its location in your organization.

The GC3 is a voluntary arena for representatives from approximately 60 US companies invested in greening their supply chains to meet, talk, and learn from the experiences of other firms participating in this endeavor. Our mission is to promote and support green chemistry and DfE research, practices, and purchases nationally among states, federal agencies, and other companies by:

- Implementing green chemistry, green engineering and design for environment throughout supply chains and share strategies to overcome barriers;
- Promote education and information on safer chemicals and products than can increase demand by broad range of consumers; and
- Identifying existing and needed information on toxics hazards, risks, exposures and safer alternatives to promote “green chemistry” as defined by the 12 Principles of Green Chemistry.

In addition to businesses, the GC3 includes a broad range of participants with expertise and interest in sustainability and green chemistry from academia and non-governmental organizations.



The organizations participating in the GC3 recognize that there is a growing market for safer products and green chemistries. As leaders in our fields, we also recognize that we must work in partnership with others to both create sustainable supply chains and differentiate our products as being truly sustainable. Our goal is to move beyond compliance with regulatory requirements to innovative product design and stewardship for the 21st century. We appreciate the fact that DfE encourages and recognizes greener chemistry, and provides industry with a credible touchstone that lets us know (and helps us communicate internally and externally) when we have innovated successfully and are on the road to sustainability. We would like to have greater access to DfE Programs so that we can show progress in developing and using green chemistries and continue to lead change in our diverse industrial sectors.

DfE's unique capacity is due in part to its strategic partnerships within the EPA. Because DfE is co-located with the New Chemicals Program in the Office of Pollution Prevention and Toxics, it has access to the technical tools and expertise of that program. DfE uses these tools to assess the environmental profiles of chemicals in commerce and safer alternatives, and then disseminates these findings. Because DfE develops this information in a multi-stakeholder context, with environmental advocates, as well as businesses, business leaders can take action with confidence. Chemical manufacturers and users can act on DfE Partnership generated information to make and use chemicals that protect the environment and human health. Businesses who participate in the DfE Partnership and act on information developed therein are recognized as leaders, both by EPA and the environmental community.

The impact of your DfE program is impressive. One example is DfE's Furniture Flame Retardancy Partnership. Pentabromodiphenyl ether - the flame retardant used to make furniture foam fire-safe - is found in increasing amounts in people and the environment. When the manufacturer of pentaBDE agreed to a voluntary phase-out of this chemical, the furniture industry and the chemical industry joined with DfE and environmental groups to evaluate alternatives. Over the course of a few months, the DfE partnership enabled the industry to protect property and save lives with alternative flame retardants that were also safer for the environment.

DfE Partnerships encourage innovation in chemical products that help protect the environment, while meeting or exceeding performance demands and providing a market advantage. For example, the DfE Formulator Program partners with formulators of products— ranging from cleaners to holding tank treatments to aircraft conversion coatings— to identify formulations that are less toxic to humans and the environment throughout their lifecycle. The Formulator Program provides recognition for those products that are the best in their class with respect to functionality and green chemistry. As participants in the program, we know that DfE understands that change is difficult and formulation chemistry is complex, as are the technical and business challenges we face as manufacturers as we optimize and balance performance, cost, and environmental concerns. That is why DfE technical assistance and expertise is so valuable to us: it is scientifically rigorous and credible. Leaders in industry and environmental advocates alike highly value DfE partnerships because they offer meaningful information, technical guidance and even recognition for products that are safer for the environment and human health.

We congratulate you on the success of your DfE Program in protecting the environment and human health. We understand that measurement of environmental results is critical to EPA programs. We know first hand that DfE produces measurable results and that through DfE we are partners with EPA in achieving and reporting those results. By helping firms who are truly committed to protecting the environment differentiate themselves as leaders in sustainability, DfE helps us grow our businesses and we help EPA report improved environmental results.

We believe that the DfE program should be a high priority in your Agency and that DfE should be provided with greater resources to enable the program to broaden its beneficial impact both on the environment and on business. We would welcome the opportunity for an in-person meeting to present the case for DfE resources. The Lowell Center for Sustainable Production is serving as the main contact for the GC3; in the case that a meeting is possible, please contact Dr. Joel Tickner at (978) 934-2981 or Joel.Tickner@uml.edu.

Sincerely,

Lowell Center for Sustainable Production

The following organizations, as part of the GC3, give their support to the content of this letter:

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