To Whom It May Concern:

IPC – Association Connecting Electronics Industries respectfully submits the following comments on the US EPA’s Notice on the Agency’s Role in Advancing Sustainable Products. IPC believes that the US EPA is in a unique position to provide the scientific information that will be necessary to advance both the development and use of sustainable products. EPA has unparalleled access to the scientific expertise essential to defining and promoting sustainable products. EPA should utilize that expertise to enhance industry and public understanding of sustainable products.

IPC, a U.S. headquartered global trade association, represents all facets of the electronic interconnection industry, including design, printed board manufacturing and electronics assembly. Printed boards and electronic assemblies are used in a variety of electronic devices that include computers, cell phones, pacemakers, and sophisticated missile defense systems. IPC has more than 2,700 member companies, 1,700 of which are located in the U.S.

EPA should develop scientific information for establishing the environmental benefits of products that are considered sustainable. Industry and the general public look to EPA to provide the scientific expertise on what is best for human health and environmental protection. EPA is in the unique position to provide the scientific information to help manufacturers to develop and consumers to choose truly sustainable products. By becoming a provider of scientific information on what makes a product sustainable, EPA will help advance sustainable products.

EPA should focus its efforts on the development of information that supports the validity of environmental marketing terms in use by the Federal Trade Commission (FTC). For example, the term biodegradable needs to be supported by testing methodologies that clearly establish and define endpoints that determine a product to be biodegradable. By developing information, from an environmental point of view, EPA will establish a common ground for both the end user and the manufacturer. The development of basic information is critical to establishing the pedigree of a sustainable product.
IPC strongly believes that EPA should not be involved in the certification of products, verification that products meet certification standards, or generating eco-labels and/or standards. The marketplace is already crowded with eco-labels and definitions of “sustainable” and “green.” If EPA adds to the plethora of labels and claims of sustainability it will only further confuse the consumer. Furthermore, this type of activity, if undertaken by the EPA would constitute a regulatory action. Regulations would stifle innovation currently happening in the marketplace. EPA should not establish criteria or regulations that define a sustainable product.

IPC believes that the EPA’s role in the area of product sustainability should be limited to one of scientific leadership. EPA’s resources allow for the development of information that can be used in validating sustainable products.

Sincerely,

Stephanie Castorina
Manager, Environmental Programs