



Responsible Purchasing Network

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To: Green Seal  
From: Alicia Culver, Executive Director, RPN  
Re: Comments on Green Seal's GS-1 Standard for Sanitary Paper Products  
Date: January 29, 2018

The Responsible Purchasing Network (RPN) is an international network consisting of hundreds of public and private sector procurement and sustainability professionals dedicated to purchasing environmentally preferable goods and services. RPN often specifies Green Seal-certified products including those that are covered by this standard. Consequently, it is important to our members that the standard be credible and strong.

RPN strongly opposes the proposal to add "rapidly renewable" virgin fiber to the GS-1 standard's list of fiber options that count toward Green Seal certification for janitorial paper products as there are likely to be significant unintended consequences of this action, which we have detailed below.

- **The proposed change will reduce market demand for post-consumer recycled content (PCRC) and other types recovered material.** Putting virgin fiber on equal footing with recycled content will reduce demand for certified janitorial paper products with recycled content. It is particularly troubling that products with rapidly renewable virgin content would not be required to contain any post-consumer recycled content since that requirement applies only to products that contain recovered material. Consequently, the proposal is likely to result in more paper, tree and agricultural waste going to landfills and incinerators.

It is a huge leap – not a logical progression – to go from allowing agricultural waste to be counted to allowing virgin fiber to be considered as a sustainable fiber.

- **The proposed change will have negative climate impacts.** Recent studies have found that smaller trees are less effective at capturing carbon dioxide (CO<sub>2</sub>) and converting it into oxygen. A March 2014 article, "Rate of tree carbon accumulation increases continuously with tree size, in the journal [Nature](#), reported "a global analysis of 403 tropical and temperate tree species, showing that for most species mass growth rate increases continuously with tree size. Thus, large, old trees do not act simply as senescent carbon reservoirs but actively fix large amounts of carbon compared to smaller trees..." This appears to contradict the basic premise of the proposed change

that smaller trees are more rapidly renewable than larger trees.

Consequently, this proposal, which encourages the planting, harvesting and replanting of smaller trees – rather than planting and maintaining larger trees – will have a negative impact on CO<sub>2</sub> levels in the atmosphere. The climate impacts will be particularly severe if the plantation replaces a mature forest that effectively sequesters carbon in leaves and ground cover (such as peat).

- **The proposed change will negatively impact biodiversity by encouraging the development of tree plantations instead of forest.** Instead, this proposal encourages janitorial paper manufacturers to grow trees in a plantation, which are typically less biodiverse than forests. Green Seal should be encouraging (through its certification program) paper manufacturers to plant and maintain forests that are certified as sustainable by the Forest Stewardship Council (FSC). According to the US Green Building Council, bamboo plantations do not support the same amount of wildlife as a native forest. See <https://oecotextiles.wordpress.com/tag/u-s-green-building-council/> for more information.

The proposal sets a bad precedent by allowing eucalyptus and other species of trees to be defined as “sustainable” under a standard other than FSC. The Rainforest Alliance [standard](#) was designed to evaluate agricultural crops – not trees. Trees typically use less water and chemical inputs than agricultural crops; therefore, most trees would easily pass the Rainforest Alliance standard. According to [www.buildinggreen.com](http://www.buildinggreen.com), “Most agriculture involves considerable fertilizer and pesticide use, topsoil erosion, chemical runoff, significant water use, and high energy inputs. From a life-cycle standpoint, even good agricultural practices carry greater environmental burdens than standard forestry.” Compared to forests, tree plantations (which, under this proposal would be considered an agricultural crop) require larger amounts of water, pesticides and fertilizers to support the trees’ rapid growth cycle. Therefore, what would be considered environmentally preferable for an agricultural crop, may not be considered “best practice” for a forest product. Trees should not be defined as sustainable because they meet a weaker standard that was designed to compare agricultural crops to each other.

Moreover, applying this inapplicable and arguably weaker standard to “tree farms” undermines the FSC certification, which ensures that sustainably certified trees are grown and harvested in a way that protects biodiversity and reduces other environmental impacts. The reason FSC rarely certifies tree plantations is because they are less environmentally beneficial than mature forests. Therefore, to call tree plantations that meet (some of) the Rainforest Alliance criteria sustainable, reduces the pressure for tree farmers to get their trees certified by FSC, which independently verifies compliance with a much more robust standard.

While we don’t encourage the use of virgin fiber in janitorial paper products, requiring FSC would be preferable to Green Seal verifying compliance with some or all of

proposed Rainforest Alliance standard, which was designed to apply to agricultural crops. This is realistic since there are some bamboo forests that are certified by FSC; see, for example, <http://www.ecoplanetbamboo.com/fsc-certification>.

- **The argument that the US Green Business Council gives credit to products that are “rapidly renewable” is weak since that proposal was strongly opposed by environmental organizations** such as the Environmental Paper Network and Conservatree.
- **The proposed Green Seal revision to GS 1 has an unacceptably vague definition of “rapidly renewable” that would allow ANY species of tree or crop to qualify – no matter how rapidly it grows in 10 years.** The definition in the proposed revision to the standard is the following: “Virgin material produced using wood or nonwood fiber sources that are harvested in cycles of less than ten years.” The standard contains no approved list of “rapidly renewable” trees or other nonwood species nor any criteria defining whether a species of trees or nonwood fiber renews relatively rapidly or not. The vagueness of the definition opens the door to greenwashing.

“Rapidly renewable” is generally not well defined and this claim has been considered “greenwashing” by the [Federal Trade Commission](#) because it is vague. In order for the claim to be legitimate, the “renewable” material must verify that it grows at the same rate – or at a faster rate – than it is used. Otherwise, it is considered greenwashing. Rapidly renewable should be held to an even higher standard – and the standard that defines “rapidly” renewable should be more clearly defined and substantiated.

**The US Green Building Council (US GBC) has a less vague definition of “rapidly renewable” that does not allow all types of trees and agricultural fibers to qualify.** According to The USGBC defines “rapidly renewable” as a material that’s able to regenerate itself in 10 years or less. That includes bio-based products made from plants harvested on a 10-year (or shorter) cycle. The goal of using rapidly renewable content is to reduce the number and quantity of products made from fossil-fuel derivatives. Not all species of trees and nonwood plants are considered rapidly renewable. Rapidly renewable materials typically include linseed, straw, cotton, wheat, sunflowers, natural rubber, bamboo, and cork. Green Seal should clarify whether all types of trees and plants that are less than 10-years old would qualify.

The Georgia Institute of Technology (GIT) study describes rapidly renewable fibers as alternatives to wood pulp and include alternative fibers such as bamboo, kenaf, hemp, flax, Miscanthus, etc.

- **The proposed revision to the GS 1 standard is (continues to be) out of step with the federal environmentally preferable purchasing guidelines**, which directs federal employees to purchase paper towels and bathroom tissue products that meet the [US EPA’s Comprehensive Procurement Guidelines](#). The CPG requires at least 40% post-

consumer recycled content (PCRC) in paper towels and at least 20% PCRC in bathroom tissue. Accordingly, Green Seal should require all GS 1-certified products to be CPG-compliant, not just those with recovered paper.

- **The Georgia Tech study that was cited to support the proposal is not sufficient for technical substantiation of the proposed changes because it is not a life-cycle assessment.** Instead, it is simply a literature review with conclusions that are suspect because it was paid for by a manufacturer, Solaris, a company that manufactures paper made of eucalyptus and acacia, and therefore has a direct financial interest in the report's findings and recommendations.

The report does not state that eucalyptus, acacia and other wood fibers are more productive when they are less than 10 years old (only that they are more productive overall). In addition, it does not define trees as rapidly renewable resources. Instead, it conflates rapidly renewable resources with alternative fibers such as bamboo, kenaf, hemp and flax, which can replace trees in pulp- and paper-making. It also admits that there is "growing interest in the pulping of agricultural residues globally." Until these sources of agricultural waste are maximized, Green Seal should not be considering less environmentally preferable sources such as virgin wood or alternative fibers since they would be a compete in the marketplace against paper made from agricultural waste or recycled paper.

- **Just because manufacturers are now offering products with virgin eucalyptus, bamboo and other types of fibers, does not mean these products are environmentally preferable.**

Finally, RPN encourages Green Seal to prohibit the following substances in section 3.5.7:

- Nonylphenol ethoxylate (NPE) and other alkyl phenol ethoxylates (APEs), which are potent endocrine disruptors that have been found in fish and clams in Morro Bay, California and linked in part to toilet paper. In addition, the San Francisco Bay Regional Quality Control Board petitioned the US EPA in 2015 to not exempt toilet paper from its proposed Significant New Use Rule (SNUR) for nonylphenol and nonylphenol ethoxylate arguing that toilet paper "has the potential to be a major source of pollution for aquatic resources receiving treated or untreated wastewater discharges."
- **Long- and short-chain fluorinated compounds**, which add water or grease resistance to some paper-based consumer products.
- **Antimicrobials** added to janitorial paper product that enable the manufacturer to make a claim that the tissue or other janitorial paper product kills germs.

In addition, in section 3.5.5, Green Seal should prohibit colorants such as “azo”, “phthalocyanine” and “diarylide” pigments that have been linked to contamination with polychlorinated biphenyls (PCBs), a class of highly persistent, bioaccumulative and toxic (PBT) chemicals that can cause cancer. An article in *Environmental Health Perspectives* title “Nonlegacy PCBs: Pigment Manufacturing By-Products Get a Second Look,” reported that Further analysis indicated that certain PCBs were prevalent in what are called azo, diarylide, and phthalocyanine pigments, which are commonly used to color inks, dyes, paint, paper, textiles, plastics, leather, cosmetics, and foods, among other materials and products. Azo and diarylide pigments are used primarily to make yellows but also some reds and oranges, while phthalocyanine pigments are used primarily to make blues and greens.”

Finally, RPN is requesting more time to fully evaluate this proposed revision to Green Seal’s janitorial paper standard. Over the past week, our outreach to other environmental non-profit organizations with deep expertise on forest conservation and sustainable paper manufacturing revealed that very few were aware of this proposed revision. We would like to have the opportunity for them to become engaged in this process.

The Responsible Purchasing Network appreciates the opportunity to comment on the proposed revisions to this standard. We’d be happy to answer any questions about our comments and look forward to continuing to be engaged in this process.