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Office of Pollution Prevention and Toxics (OPPT)
Environmental Protection Agency
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EPA's Role in Advancing Sustainable Products

To Whom It May Concern:

On behalf of the American Apparel & Footwear Association (AAFA) – the national trade association of the apparel and footwear industries, and their suppliers – on the captioned request for comments.

As you may know the apparel and footwear sector – both the overall industry as well as individual corporations – has made important contributions in the area of sustainability and environmental protection. This work takes on many forms, including use of environmentally friendly materials and production processes, development of indices and other metrics to measure environmental impacts, and educational initiatives to make sure complex global supply chains are aligned to advance environmental goals.

At the AAFA, environmental work has been a growing and sustained area of our work for some time. For example, our Environmental Committee has grown tremendously over the past decade and now numbers about 150 professionals from throughout the industry. Through this Committee, AAFA has developed an array of environmental tools, including a best practices list and an industry restricted substances list (RSL) that is freely available at www.apparelandfootwear.org. Moreover, in conjunction with AFIRM group, we have conducted a series of environmental, sustainable, and chemical management programs throughout the United States and around the world. Next month we are holding our first seminar on this important topic in Vietnam.

In addition, we have partnered with a number of other organizations doing ground breaking work on sustainable initiatives. We recently endorsed the Eco Index, which has been developed by the Outdoor Industry Association (OIA), to provide apparel and footwear companies with a common approach to measuring sustainability at the product and facility level. We are also encouraging our members to explore other initiatives, such as those

promoted by Business for Social Responsibility's (BSR) Apparel, Mills and Sundries Working Group and the National Resources Defense Council (NRDC) Clean By Design.

Moreover, it is our strong hope that the EPA will work cooperatively with the many other federal and state entities that are currently working in this area as well. One area of significant and constant concern arises from the many duplicative and conflicting regulatory requirements that are being imposed on the private sector in the name of sustainability and environmental health. Companies find it extraordinarily difficult to comply with a confusing patchwork of federal and state regulations and laws. Additional costs associated with redundant compliance can be spent more efficient on programs that directly benefit the environment. Perhaps the EPA can play a coordinating role to ensure that individual state and foreign regulations and legislation reinforce, and not deviate from, a common approach.

Likewise, the private sector is often forced to implement programs that provide no clear benefit for the environment, but which carry significant compliance burdens and costs. We believe such the adverse effect of such programs can be greatly mitigated if programs are developed with all stakeholders in a predictable and transparent process with a full understanding of costs and benefits.

Our hope is that as the EPA moves forward with its review of this dynamic and ever changing issue, that it will work closely with groups such as the AAFA to make sure it supports and builds upon the considerable work that has already been done by the private sector, in conjunction with various stakeholders.

We look forward to working with the EPA in this endeavor.

Should you have additional comments, please me at slamar@apparelandfootwear.org or 703-797-9041.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen Lamar". The signature is fluid and cursive, with a long horizontal stroke at the end.

Stephen Lamar
Executive Vice President