

Tentative Specification for Paint

April 2019

Summary of Comments and Edits

In April 2018, a tentative specification for Paint was approved by the Interagency Committee on Sustainability and Green Procurement. Comments on the tentative specification were received from the Healthy Schools Network requesting that a lead-free requirement be added; from UL requesting changes to the definitions of UL EcoLogo and UL GREENGUARD Gold certifications and that UL GREENGUARD Gold be a requirement; and from the American Coatings Association requesting that the Master Painters Institute Extreme Green and Green Wise Gold certifications be removed, claiming that they were not developed in a consensus-based fashion, are not widely used or considered credible, and that their test methods do not align with ASTM test methods.

In response to these comments, the following changes were made to the specification:

- The definitions of UL EcoLogo and UL GREENGUARD Gold were changed to align with the text requested by UL and the definitions in other tentative specifications.
- Green Wise and Green Wise Gold were removed from the list of required certification options. After investigating the standards in light of the American Coating Association's comments, it was determined that the Green Wise standards are not developed using a thorough stakeholder process. The Master Painters Institute's Extreme Green certification remains as it has been vetted by the US EPA and is included on their list of approved standards for federal procurement.
- The hierarchy of required certification options was removed due to expressed confusion from stakeholders about how it affected the requirement to have "at least one of the following multi-attribute third-party certifications" and because the intent of the hierarchy was altered with only one "strong" certification remaining.
- Under the section on encouraged environmental attributes more detail was added as to why each certification program was included in that section.

No changes were made in response to the request to add a lead-free requirement. The Interagency Committee appreciates the Healthy Building Network raising this concern, but it does not appear the market would be able to meet such a requirement at this time. All of the required certification options include lead on their list of chemicals of concern that the product may not contain above the dictated threshold.