Floor Coverings Specification

Amendments summary and review

Floor Coverings specification was released as a tentatively approved specification by the Interagency Committee in 4/2018. Comments on the specification were received throughout 2018. The specification was amended further throughout late 2018 and early 2019 due to comments received, conversations with industry representatives and interested NGOs, and further research by DEC. Those amendments appear in purple colored font on the new tentative Floor Coverings specification, which will be reviewed by the Interagency Committee to be released as a new tentative specification in 4/2019.

Overall, comments have been received by:

Healthy Schools Network

Clean and Healthy NY

Carpet and Rug Institute

American Chemistry Council / Fluorocouncil / The Vinyl Institute

National Science Foundation

The Resilient Floor Covering Institute

Underwriters Laboratories

Tarkett

The Dixie Group DBA Masland Contract

Mohawk

Interface

Shaw

We have had phone conversations with:

Claire Barnett (Healthy Schools Network)

Interface

Shaw

Tarkett

Carpet and Rug Institute

Pending: The American Chemistry Council

Amendments Review:

1. Specifications section, part I. Procurement

   This section was amended to address the need to lay out more granular sourcing encouragements for types of flooring. Since this is not cut-and-dry based on material or flooring types alone, it was important to include information on material sourcing, issues associated with some types of recycled content, and the importance of recognizing that categories of flooring types (e.g. bio based, fluid-applied-flooring) can often rely on new or proprietary technologies, therefore it is important to check with parameters laid out in the remainder of the spec. to ensure that flooring materials adhere to the spec. This came as a response to Healthy Schools who requested that we include a wider array of floor surfaces that people walk on, including carpeting and carpet padding, wood flooring, laminate, hard flooring, resilient flooring and seamless polymer.

   It is also important to note that certified wood-based flooring ranks high on the list not only due to its low global warming impact, but also because of the carbon offsetting attributed to tree growth. It is recommended by an DEC Article 7 bill entitled "Empire Forest for the Future" that the state purchase more sustainable wood-based products - https://www.dec.ny.gov/lands/112691.html

2. Definitions

   Some definitions of specific words or abbreviations were added to the specification. This includes an updated definition of PVC and an updated description of its manufacturing process in the background section. It was important to update this definition specifically because most PVC is no longer manufactured with added phthalates as a plasticizer, and **the Vinyl Institute** (ACC) and Tarkett in particular, wanted there to be awareness of this. Other new definitions include Semivolatile organic compounds (SVOCs) since many of these can be present in carpet and floor coatings. It was important to distinguish these from VOCs as VOC emissions tend to diminish over time, SVOC emissions can increase over time, especially with heavy traffic. Common SVOCs include Polyaromatic Hydrocarbons (PAHs), Polychlorinated byphenyls (PCBs), Polybrominated flame-retardants, Perfloroalkyl acids (PFAAs), Pthalates and Pesticides. Other definitions that were added are Prop 65, PFCs, antimicrobials and ortho-phtalates, as these chemical groups were called out later in the spec. and it was requested by NGOs (HSN & CHNY) that we define them as well. It was also requested that we define the Association of Occupational and Environmental Clinics since they are the best non-profit resource database on asthmagins, which is any substance that is causally-related to the development of asthma, often relating to chemicals used in carpet or dust that gets trapped in carpet. Finally, we added a definition for Floor Coverings designed as a lead-into the aforementioned specifications section. This definition delineates hard flooring, resilient flooring, carpet tiles and broadloom carpet.

3. Part II – All floor coverings

This section was updated to allow for an additional certifying program by Living Building Challenge, as requested by Mohawk & Tarkett, and also brought to our attention by NGOs. Essentially, floor coverings must be certified by either the Living Building Challenge Declare Label or Cradle to Cradle at the silver level or greater. If they are not certified by either body, they must have a health product declaration (HPD) AND an environmental product declaration (EPD), both of which have specific parameters laid out in the specification. They must also be certified as low emitting under either UL Greenguard Gold, CRI Green Label Plus, or the SCS FloorScore standard. We felt that this reworking would give manufacturers additional options while still ensuring they meet our environmental and health standards laid out in the specification.

4. Other minor additions: We added a sentence for ALL floor covers, as an encouragement, that they contain no **intentionally added** chemicals listed on the State of California's Proposition 65 list at levels that would require a warning. For carpet specifically, Shaw suggested we add that affected entities **shall**, to the maximum extent practicable contain no polyurethane backing (which results in a further lack of recycling options for carpet). We also added that carpet be made of nylon rather than wool because it has less of a climate change impact. Per a comparative study by Dovetail Partners Consuming Responsibility Report No. 4 – *Comparison of Environmental Impacts of Flooring Alternatives*: Wool carpeting has the worst impact to climate change than any other type of flooring, with all carpet in general still having a greater impact than hard and resilient flooring options. Flooring made of plant-based materials has a significantly lower global warming potential AND a lower environmental impact than any other option.

5. Note on Carpet being low on the preferred flooring for procurement: carpet has the most global warming potential, and the largest environmental impact of any other flooring product on the market. There are issues associated with asthmagens due to the chemicals often found in carpeting, as well as SVOCs and dust that can enter the air. We are unable to determine if an entity will perform proper maintenance of a carpet, or any flooring for that matter, as requested by the manufacturer, which can potentially reduce the levels of asthmagens. While carpet manufacturers may sometimes have take-back programs, there are few, and there are no governmental programs for carpet recycling here in NY, despite legislation that was proposed in 2018 but did not advance. Per the Product Stewardship Institute, carpet is often very different to recycle as there are limited recycling outlets country-wide, and there are many issues with the carpet stewardship program in California. Since carpet contains many different components, it is debatable as to which type of carpet is easiest and most cost effective to recycle. Carpet America Recovery Effort (CARE) (which is a partnership among mostly industry representatives to find carpet recycling means and outlets) had many non-compliance issues in 2013-2016 and are falling short of recycling goals.

   Carpet in landfills have been shown to take up a lot of space, degrade slowly over time and leach persistent and sometimes bio accumulative chemicals into landfill leachate. Carpet has a lifespan of only about 11-15 years, making it one of the least durable flooring materials, especially in commercial applications, where it is often overlaid directly on concrete subfloor

and glued, as opposed to backed with a carpet pad, which can increase its lifespan, but would also contribute to more materials being used at the source.