

# **GSA Acquisition Policy Federal Advisory**



Adapted from:<https://thenounproject.com/> and used under CC-BY license.

## **Committee (GAP FAC) Recommendations 2023 -02**

**Winter 2023**

# TABLE OF CONTENTS

<b>COMMITTEE MEMBERS</b> .....	<b>2</b>
<b>LETTER OF TRANSMITTAL</b> .....	<b>3</b>
<b>EXECUTIVE SUMMARY</b> .....	<b>6</b>
<b>GAP FAC SUBCOMMITTEES &amp; MEMBERS</b> .....	<b>9</b>
<b>ACKNOWLEDGEMENTS</b> .....	<b>10</b>
<b>RECOMMENDATIONS</b> .....	<b>11</b>
<b>ACQUISITION WORKFORCE</b> .....	11
Recommendation 1: Issue a Request for Information on Third-Party Training.....	11
Recommendation 2: Emphasize Experiential Learning .....	12
Recommendation 3: Lead a Cross-Agency Effort on Data Standardization, Collection, and Training .....	13
Recommendation 4: Convene an Artificial Intelligence Task Force.....	14
Next Steps for the Acquisition Workforce Subcommittee and Potential Future Recommendation(s).....	15
<b>INDUSTRY PARTNERSHIPS</b> .....	16
Recommendation 5: Use Challenge.gov to Address Climate and Sustainability Priorities .....	16
Next Steps for Use of Challenge.gov.....	18
Recommendation 6: Create a Focus Group for Advancing a Maturity Model.....	19
Recommendation 7: Create a Council Charged with Planning a “Lighthouse” Network of Networks .....	20
Next Steps for the Industry Partnerships Subcommittee and Potential Future Recommendation(s).....	23
<b>POLICY &amp; PRACTICE</b> .....	24
Recommendation 8: Reduce PFAS in Federal Procurement.....	24
Recommendation 9: Reduce Environmental and Human Health Risks Associated with Federal Procurement.....	31
Recommendation 10: Establish a Sustainable Procurement Center of Excellence (SPCoE).....	33

# COMMITTEE MEMBERS

**Troy Cribb**  
**Chair**  
*District of Columbia*

**Cassius Butts**  
**Co-Chair**  
*Georgia*

**Farad Ali**  
*North Carolina*

**Denise Bailey**  
*Pennsylvania*

**C. Gail Bassette**  
*Maryland*

**Luke Bassis**  
*New York*

**Richard Beutel**  
*Delaware*

**Leslie Cordes**  
*District of Columbia*

**Darryl Daniels**  
*Michigan*

**Prof. Nicole Darnall**  
*Arizona*

**Antonio Doss**  
*District of Columbia*

**Mark Hayden**  
*New Mexico*

**Susan Lorenz-Fisher**  
*Pennsylvania*

**Mamie Mallory**  
*District of Columbia*

**David Malone**  
*Mississippi*

**Deryl McKissack**  
*District of Columbia*

**Dr. Amlan Mukherjee**  
*District of Columbia*

**Jennie Romer**  
*District of Columbia*

**Anne Rung**  
*Washington*

**Prof. Steven Schooner**  
*District of Columbia*

**Kristin Seaver**  
*Virginia*

**Stacey Smedley**  
*Washington*

**Nigel Stephens**  
*Maryland*

**Clyde Thompson**  
*Georgia*

**Anish Tilak**  
*California*

**Keith Tillage**  
*Louisiana*

**Dr. David Wagger**  
*District of Columbia*

**Dr. Kimberly Wise White**  
*District of Columbia*

# LETTER OF TRANSMITTAL

February 1, 2024

The Honorable Robin Carnahan  
Administrator  
General Services Administration  
1800 F St. NW  
Washington, D.C. 20405

Dear Administrator Carnahan:

The General Services Administration Acquisition Policy Federal Advisory Committee (GAP FAC) is pleased to present the Committee's second set of recommendations aimed at improving the government's effectiveness in incorporating climate and sustainability considerations in acquisition processes.

The Committee adopted ten recommendations at its December 5, 2023 public meeting based on the deliberations and recommendations of GAP FAC's three subcommittees:

## Acquisition Workforce:

Issue a request for information to learn more about third-party training offerings on sustainability and climate change.

Emphasize experiential learning (e.g., hands-on, practical experiences) to foster a deeper understanding of subject matter.

Develop and lead a cross-agency effort to establish a federal data standard and protocols for ecolabel certifications and utilization.

Convene a task force to assess the potential use of Artificial Intelligence (AI) by the acquisition workforce.

## Industry Partnerships:

Use prize competitions through Challenge.gov to attract innovators in the sustainability space into the federal marketplace.

Create a task force or focus group to identify the best partners to participate in the sponsorship of a maturity model for sustainability and climate change.

Create a "Lighthouse" network of networks to broadcast opportunities for the existing and potential supplier base and foster collaboration of industry and government.

### Policy and Practice:

Minimize acquisition of products containing per- and polyfluoroalkyl (PFAS) substances.

Reduce human health risks associated with federal procurement by leveraging safety information from other agencies.

Establish a Sustainable Procurement Center of Excellence to foster a dynamic exchange of information among federal, state, local and tribal governments.

The Committee's full description of these recommendations is attached.

Some of these recommendations provide more granularity to proposals put forth in our previous recommendations, while other recommendations chart new courses for GSA. While our recommendations were developed in the context of addressing climate change and sustainability, our goals – strengthening the acquisition workforce, expanding the government's supplier base and developing clear and actionable policies and practices – apply equally to all major challenges in federal acquisition. Thus, our recommendations yield concepts and frameworks that could be applied to any number of other priorities in federal acquisition, such as the responsible adoption of AI and the expansion of opportunities for small businesses.

The Committee commends GSA for its prompt consideration of our May 4, 2023 recommendations and its progress toward implementation. GSA's actions include:

- Issuing a proposed GSA Acquisition Regulation (GSAR) rule to incentivize use of packaging that is free of single-use plastics.
- Adding GSA's Chief Sustainability Officer to GSA's Acquisition Review Boards, to ensure that sustainability is considered in strategies for major acquisitions.
- Developing a comprehensive policy that would require each GSA head of contracting activity to designate a lead on sustainability, in order to coordinate actions on sustainability.
- Rethinking existing training on sustainability and climate risk management to work toward a mandatory course for the acquisition workforce (while also thinking long-term toward a sustainability credential for acquisition workforce training).
- Conducting training in sustainable business practices for customer agencies as well as state, local and tribal governments.
- Encouraging new entrants into the federal marketplace by drafting solicitation language that expresses preference for low-embodied carbon building materials.


We thank you, Associate Administrator Krystal Brumfield and Senior Procurement Executive Jeff Koses for your outstanding leadership in improving the ways in which the government buys while advancing important policy goals. We also want to express our continued gratitude for the tireless efforts of our designated federal officers, Boris Arratia and Stephanie Hardison, as well as the steady operational assistance of Skylar Holloway and David Cochennic.

We look forward to your feedback and our continued work, as aptly captured by Associate Administrator Brumfield, toward a cleaner, healthier, more prosperous America.

Sincerely,

DocuSigned by:  
  
6DE702F54C314F2...

Troy Cribb  
Chair, GSA Acquisition Policy federal Advisory Committee

DocuSigned by:  
  
6E7D450F4AE649B...

Cassius Butts  
Co-Chair, GSA Acquisition Policy federal Advisory Committee

Cc:

Katy Kale, Deputy Administrator, GSA

Krystal Brumfield, Associate Administrator, Office of Government-wide Policy, GSA

Exodie C. Roe, III, Associate Administrator, Office of Small Disadvantaged Business Utilization, GSA

Jeffery Koses, Senior Procurement Executive, GSA

Elliot Doomes, Commissioner, Public Buildings Service, GSA

Tom Howder, Acting Commissioner, Federal Acquisition Service, GSA

Members of the GSA Acquisition Policy Federal Advisory Committee

## EXECUTIVE SUMMARY

The General Services Administration (GSA) Acquisition Policy Federal Advisory Committee (GAP FAC) serves as an advisory body to GSA's Administrator on how GSA can use its acquisition tools and authorities to target the highest priority federal acquisition challenges. The GAP FAC advises the GSA's Administrator on emerging acquisition issues, challenges, and opportunities to support its role as America's buyer. The GAP FAC was chartered in July 2022, with its initial focus on driving regulatory, policy, and process changes required to embed climate and sustainability considerations in federal acquisition. The Committee adopted an initial six recommendations on May 4, 2023.

The GAP FAC adopted an additional ten recommendations on December 5, 2023 to support GSA in its mission to create a modern, accessible, and streamlined acquisition ecosystem. Those recommendations, generated by the Committee's three subcommittees, are summarized as follows:

### **Acquisition Workforce:**

**Recommendation 1: Issue a request for information to learn more about third-party training offerings on sustainability and climate change.** In May 2023, as part of the Committee's recommendation to make sustainability a core, foundational capability across the acquisition workforce, the Committee suggested that GSA leverage third-party training to help members of the acquisition workforce keep pace with the rapidly changing landscape of sustainability knowledge. The Committee now recommends that GSA issue a request for information to learn more about third-party training opportunities, with an emphasis on the following criteria: reputation and independence; adaptability and quality; track record and affordability; accessibility and continuous learning; and scaling and networking.

**Recommendation 2: Emphasize experiential learning to foster a deeper understanding of sustainability principles.** Experiential learning is an educational approach that emphasizes hands-on, practical experiences as a primary means of learning and skills development. It involves learning by doing and revolves around the idea that individuals learn best when they actively engage with tasks, problems and real-life situations, rather than passively receiving information. The Committee has identified the following elements as important to experiential learning in the sustainability context: hands-on learning involving real-world challenges; practical application that fosters cooperation and relationship-building within the acquisition community; integration of principles into acquisition scenarios that makes sustainability concepts practical, applicable and relevant to the participants' roles; and an approach that encourages creative problem-solving.

**Recommendation 3: Develop and lead a cross-agency effort to establish a federal data standard and protocols for ecolabel certifications and utilization.** This recommendation is designed to provide more support to the acquisition workforce to meet the intent of current and proposed rules to "procure sustainable products and services to the maximum extent practicable" by ensuring the workforce is provided accurate, reliable and consistent data to identify a product or service as compliant. This effort would also ease the burden on vendors in their efforts to track and report on ecolabel product information. As a cross-agency coordinator and convenor, areas GSA should explore include: reviewing ecolabel standards under product families; working with suppliers on correct categorization of ecolabels;

providing the acquisition workforce additional ecolabel data; standardizing data needs and requests across federal agencies; and developing training and design feedback on tools that provide the acquisition workforce and vendors green product information.

**Recommendation 4: Convene a task force to assess the potential use of AI by the acquisition workforce.** A GSA-led inter-agency task force should assess potential benefits of the use of AI in acquisition processes, while also aligning use of AI with government-wide and agency goals, privacy and security requirements and the best interests of the public. Potential benefits of using AI to help the acquisition workforce embed sustainability into the procurement lifecycle include improvements in market research, regulatory compliance, decision-making and risk management.

### **Industry Partnerships:**

**Recommendation 5: Use prize competitions through Challenge.gov to attract innovators in the sustainability space into the federal marketplace.** In May 2023, the Committee recommended that GSA develop and deploy targeted procurement initiatives under the climate change/sustainability umbrella to fast track new entrants into the federal marketplace. As follow-up on this recommendation, the Committee suggests that GSA conduct prize competitions under the existing Challenge.gov to help solve sustainability and climate challenges. Through use of this tool, GSA will send a strong demand signal that will reach small and mid-sized innovative firms who can provide game-changing technologies, products and services. The Committee lays out critical steps and considerations for GSA in making best use of the Challenge.gov tool.

**Recommendation 6: Create a task force or focus group to identify the best partners to participate in the sponsorship of a maturity model for sustainability and climate change.** In May 2023, the Committee adopted a recommendation for GSA to sponsor a maturity model that will equip the federal supplier base with accurate and actionable information, proven methods, standard terminology, and consistent educational tools around federal acquisition requirements for sustainability. To help GSA launch such a model, the Committee recommends that GSA establish an inter-agency task force or focus group to identify the best partners to participate in the sponsorship of the maturity model. While the Committee does not recommend that GSA turn over creation and ownership of the model to a commercial provider, GSA may wish to consider using the RFI process to solicit third-party support and could also seek other affinity groups to participate.

**Recommendation 7: Create a “Lighthouse” network of networks for GSA to broadcast opportunities for the existing and potential supplier base and foster collaboration between industry and government.** The Lighthouse would build an engaged community where businesses collectively drive growth and innovation. This approach in particular would make federal contracts more accessible to innovative emerging, small and underrepresented businesses, expanding the number of participants in the federal supply chain. As a first step, the Committee recommends that GSA form a council to provide direction and a plan for implementation. The Committee’s recommendation lays out key factors for establishing an effective council and a phased approach for creating the Lighthouse through planning, engagement, community-building and continuous optimization.



## **Policy and Practice:**

**Recommendation 8: Minimize acquisition of products containing per- and polyfluoroalkyl (PFAS) substances.** PFAS, known for their persistence and recognized for adverse effects on human health and the environment, pose a significant concern in the realm of federal procurement. The Committee lays out strategies GSA can deploy for minimizing PFAS and moving towards a goal of reduced PFAS in the supply chain. Steps include leveraging ecolabels, updating contract language and initiating a FAR case to develop terms and conditions regarding PFAS, improving supplier reporting on PFAS, providing supply chain incentives, expanding training on PFAS for the acquisition workforce, and updating procurement tools (such as the Sustainable Facilities Tool) to reduce PFAS where other products are available. GSA can start this effort by identifying ongoing federal and state policies to minimize PFAS.

**Recommendation 9: Reduce environmental and human health risks associated with federal procurement by leveraging safety information from other agencies.** The Committee's recommendation provides guidance to GSA on how to develop improved procurement processes to reduce risks from possible exposure to chemicals in procured products. It will be key to develop procurement processes informed by science and for suppliers to disclose chemical and ingredient information about their products. Where feasible, GSA should incorporate exposure and toxicity data to inform the selection of materials and products and, using those profiles, GSA should work toward setting a hierarchy of preferences that encourage the procurement and use of materials and products that present a lower risk to human health and the environment. The Committee recommends that GSA identify priority categories of procurement and priority substances, build on existing frameworks and launch pilot projects to build institutional capacity.

**Recommendation 10: Establish a Sustainable Procurement Center of Excellence to foster a dynamic exchange of information among federal, state, local and tribal governments.** A Center of Excellence would foster a dynamic exchange of information among different levels of government. GSA is already the national leader and a model for sustainable acquisition to many state and local procurement entities. The Center would serve as the national authority on sustainable acquisition, identifying best practices, providing guidance to procuring authorities at all levels of government, identifying opportunities for collaboration, and seeking uniformity wherever possible to maximize the impact of sustainable procurement.

## GAP FAC SUBCOMMITTEES & MEMBERS

### Acquisition Workforce

Prof. Nicole Darnall,  
*Chairperson*

Anne Rung,  
*Co-Chairperson*

C. Gail Bassette

Darryl Daniels

Mark Hayden

David Malone

Steve Schooner

Kristin Seaver

Clyde Thompson

### Industry Partnerships

Kristin Seaver,  
*Chairperson*

Farad Ali,  
*Co-Chairperson*

Denise Bailey

C.Gail Bassette

Susan Lorenz-Fisher

Mamie Mallory

Deryl McKissack

Stacy Smedley

Nigel Stephens

Keith Tillage

Dr. David Wagger

Dr. Kimberly Wise White

### Policy & Practice

Luke Bassis,  
*Chairperson*

Dr. David Wagger, *Co-Chairperson*

Richard Beutel

Leslie Cordes

Nicole Darnall

Antonio Doss

Mark Hayden

Dr. Amlan Mukherjee

Jennie Romer

Prof. Steve Schooner

Stacy Smedley

Nigel Stephens

## ACKNOWLEDGEMENTS

The GSA Acquisition Policy Federal Advisory Committee would like to express our heartfelt gratitude and appreciation to all the individuals who have contributed their time, effort, and expertise to the success of this Committee as we developed this second set of recommendations. We are deeply grateful for your steadfast support.

**Kailey Burger Ayogu**

*Harvard Government Performance Lab Harvard  
Kennedy School*

**Steven Baker**

*General Services Administration*

**Warren Blankenship**

*General Services Administration*

**Michael Bloom**

*General Services Administration*

**John Braze**

*Mir Ventures*

**Julia Comeau**

*Hewlett Packard*

**Brennan Conaway**

*General Services Administration*

**Michael Cooper**

*General Services Administration*

**Betty Cremmins**

*Council on Environmental Quality*

**Patricia Dillon**

*Global Electronics Council*

**Sarah Doll**

*Safer States*

**Denise Elsbernd**

*General Services Administration*

**Bowen Fong**

*General Services Administration*

**David Gill**

*Internal Revenue Service*

**Neha Gupta**

*Harvard Government Performance Lab Harvard  
Kennedy School*

**Elena Hoffnagle**

*Harvard Government Performance Lab Harvard  
Kennedy School*

**Yonne Huemer**

*McKinsey*

**Savannah Kernc**

*Document Imaging Dimension, Inc*

**Kelsey Kober**

*Hewlett Packard*

**Jarah Meador**

*General Services Administration*

**Kathryn Newhouse**

*Council on Environmental Quality*

**Steve Noyes**

*Noyes Associates*

**Tia Perry**

*AEC Unites*

**John Reeder**

*Environmental Working Group*

**Simon Roberts**

*American Chemistry Council*

**Rachel Simon**

*Global Electronics Council*

## RECOMMENDATIONS

### ACQUISITION WORKFORCE

As a Committee committed to organizational excellence, we focus on empowering and equipping GSA's federal acquisition workforce to prioritize environmental outcomes and promote sustainability throughout the acquisition lifecycle. To realize this mission, our Acquisition Workforce Subcommittee has identified two initial priority areas, with the first focused on identifying the essential pathways needed to make environmental and sustainability considerations a core competency in federal acquisition. Recognizing the importance of this mission, the second priority is the need to identify the

critical levers needed to empower the acquisition workforce to prioritize environmental outcomes and promote sustainability with the least amount of effort.

For this second set of recommendations, the Committee offers two recommendations related to Priority 1 and two recommendations related to Priority 2.

### **Recommendation 1: Issue a Request for Information on Third-Party Training**

As GSA embeds environmental and sustainability considerations across the Federal acquisition lifecycle, all acquisition professionals will need basic climate change training. Many third party training providers deliver sustainability and climate mitigation training. *We recommend that GSA issue a request for information to learn more about these third-party training opportunities.* Further, we suggest the following selection criteria to consider:

1. **Reputation and Independence:** The organization should have a strong reputation and recognition within the profession or industry for delivering high-quality training. It should be an independent organization, not affiliated with any specific industry or government agency, ensuring impartiality and neutrality.
2. **Adaptability and Quality:** The training content should be dynamic, adapting to changing regulations and social concerns to ensure that learners are up to date with the latest developments. The training content should address emerging concerns and trends, preparing learners for future challenges in the profession. The organization should offer high-quality training materials and assessments to ensure effective learning and skill development.
3. **Track Record and Affordability:** The training organization should have a track record of consistently delivering high-quality training demonstrating the organization's competence and success. The training should be reasonably priced, making it accessible to a wide range of learners without compromising quality.
4. **Accessibility and Continuous Learning:** The organization should also offer an agile platform for content delivery providing multiple channels for delivery and an ability to adjust these channels as requirements change. The training should be easy to use, with user-friendly platforms or delivery methods, ensuring a seamless learning experience. The training should offer options to "tool-up" and stay current with evolving trends and knowledge in the profession, allowing learners to continuously develop their skills.
5. **Scaling and Networking:** The training organization should provide options to scale the number of badges or credentials, accommodating the needs of both individuals and organizations with varying training requirements. It should facilitate networking opportunities for learners, fostering connections within the profession and promoting collaboration.

### **Recommendation 2: Emphasize Experiential Learning**

As GSA considers its training options, we recommend that **all training (including training offered by third-party providers) emphasize experiential learning to foster a deeper understanding of the subject matter.** Experiential learning is an educational approach that emphasizes hands-on, practical experiences as a primary means of learning and skill development. It involves learning by doing and revolves around the idea that individuals learn best when they actively engage with tasks, problems, or real-life situations, rather than passively receiving information. Identified below are important elements for GSA to consider as it assesses its experiential learning options.

1. **Hands-on Learning:** Effective facilitation is vital to guide and support learners in the context of sustainable federal acquisition practices, ensuring they understand and integrate sustainability principles. It should engage learners in hands-on experiences related to embedding sustainability into the acquisition process and encourage them to reflect on those experiences, connecting theory to practice. Experiential learning should be skill-focused and enable learners to address real-world sustainability challenges within federal acquisition processes, showcasing successful examples to inspire learners to apply sustainable practices in their own acquisition initiatives. It should encourage peer collaboration, where participants within federal agencies share insights, strategies, and best practices.
2. **Practical Application:** We recommend that experiential learning should leverage tools and resources that are tailored to federal acquisition, encouraging participants to use practical sustainability approaches in their procurement processes. Participants should work collaboratively in teams to simulate actual federal acquisition settings, foster cooperation and relationship-building within the federal acquisition community, and provide a secure space for learners to experiment with sustainable procurement strategies. Opportunities should be created for practical applications that embed sustainability into the federal acquisition process to be presented to higher-level managers for feedback and implementation.
3. **Integration and Relevance:** Learners should engage in reflective practices that link sustainability principles to current and future federal acquisition scenarios, making sustainability concepts practical and actionable. The learning materials and examples should closely mirror the complexities and challenges faced in federal acquisition, ensuring that sustainability content is directly applicable to the participants' roles. It should accommodate federal acquisition professionals with varying levels of expertise, ensuring that both newcomers and experienced professionals can benefit from the sustainability-focused training.
4. **Creativity and Problem Solving:** We recommend that experiential learning should include a variety of techniques that encourage creative problem-solving techniques specific to sustainability in federal procurement, such as ethical dilemmas, case assessments, managerial pitches, simulations, and sustainability debates.

These four experiential learning elements collectively create a dynamic learning environment that combines theory and practice. They foster collaboration and equip learners with valuable skills and knowledge that can be leveraged as they strive to embed sustainability into federal acquisition.

### **Recommendation 3: Lead a Cross-Agency Effort on Data Standardization, Collection, and Training**

Our third recommendation is that GSA provide more support to the acquisition workforce to meet the intent of current and proposed rules to “procure sustainable products and services to the maximum extent practicable”<sup>1</sup> by ensuring the workforce is provided accurate, reliable and consistent data to identify a product or service as compliant. We advocate that **GSA develop and lead a cross-agency effort that establishes a federal data standard and protocols for ecolabel certifications and utilization.** Important leadership that GSA should involve include GSA’s Chief Sustainability Officer and GSA’s Chief Data Officer. Other stakeholders who should be involved include: GSA’s Office of Government-wide Policy, which houses the Sustainable Facilities Tool (SFTool), and the Federal Acquisition Service’s (FAS) Office of Industrial Climate, which houses the Green Procurement Compilation, and other government owned ecolabels (e.g., Safer Choice, ENERGY STAR, etc).

---

<sup>1</sup> See, e.g., FAR Case 2022-006, Federal Acquisition Regulation: Sustainable Procurement

Such an effort will also ease the burden on vendors who often lack accurate, reliable, and consistent data, thus reducing their ability to operate as efficiently and effectively as possible. One vendor, an office supplies vendor for GSA's government-wide contract, shared that they must undertake a manual effort to pull green and sustainability product information from multiple sources, such as manufacturers, wholesalers, and government sites. The data is reported inconsistently across these channels, with some government sites, for example, missing key information, such as manufacturing part numbers or photos, to help suppliers more easily ensure they are reviewing comparable products for compliance. The vendor then undertakes a time-consuming effort to normalize the data before it is entered into their own company system, which they created for the sole purpose of tracking and reporting on their ecolabel product information.

We believe that GSA is best positioned to lead the charge as cross-agency coordinator and convenor for data standards and data collection protocol to support the acquisition workforce and vendors, and to actively encourage agency leaders to work together to address these problems. In our engagement with the acquisition workforce, they identified several suggested areas for focus, which we describe briefly below. We recognize that this list is not comprehensive or complete, but rather suggested areas for GSA to further explore.

1. **Review Ecolabel Standards Under Product Families:** EPA owns and manages several ecolabels in addition to managing a list of recommended private sector standards and ecolabels where they provide links to each individual product registry. Each product registry is managed by the ecolabel organization themselves. These lists are being integrated into federal procurement systems including the SFTool and GSA Advantage. Certification occurs at the product family level, with all products within that family identified as meeting a particular standard or ecolabel. However, within a product family, it is possible that individual products may not meet the ecolabel standards. The acquisition professional therefore may purchase products that are falsely identified as meeting the ecolabel's expectations.
2. **Work with Suppliers on Correct Categorization of Ecolabel Standards:** Companies may categorize identical products under different families, leading to some product families (and their products) failing to qualify for an ecolabel when in fact they should.
3. **Provide the Acquisition Workforce with Additional Ecolabel Data:** Different ecolabel registries may exclude important information (beyond the product-level certification), which are critical to decision making for the federal acquisition worker. Example data include unique manufacturer part numbers, product type/category, product images, and other data not present in existing registries.
4. **Standardize Data Across Federal Agencies:** Federal ecolabel programs as well as private sector ecolabels are using different data and storage standards during the development of their ecolabel registries. This situation makes it difficult to merge sustainability data across multiple ecolabels and integrate them into existing procurement systems. The unification of data standards across ecolabels is critical for interoperability and harmonizing sustainability product information across operations. It also enhances the impact of training and existing green product tools (see item 5).
5. **Develop Training and Design Feedbacks on Existing Tools:** While more work needs to be done to ensure that the federal government is providing the acquisition workforce and vendors consistent, reliable, and comprehensive green product information, workers and vendors also require additional education and training on how to use federal green product technology resources. Resources such as the SFTool.gov, managed by GSA, and GSA Advantage's Environmental Program Aisle are two examples. These resources help federal buyers, program managers and vendors to learn more about sustainable procurement best practices around sustainability, including information related to standards and ecolabels by product category. However, additional training is needed to improve their

utilization and meet increasing expectations to embed sustainability into federal acquisition. To further encourage the use of these tools, technology developers need to create strong feedback opportunities so that federal green product technology resources are continually updated in a way that improves the federal acquisition worker experience.

#### **Recommendation 4: Convene an Artificial Intelligence Task Force**

Following the White House’s Executive Order on Safe, Secure, and Trustworthy Artificial Intelligence,<sup>2</sup> and GSA’s recent support of this Executive Order, GSA should assess how Artificial Intelligence (AI) may be an important tool to empower the acquisition workforce to embed sustainability into federal acquisition. As a first step, we recommend that **GSA should convene a task force to assess the potential that AI holds and ensure that AI options align with the agency’s goals, privacy and security requirements, and the best interests of the public.** Other agencies (e.g., IRS and Treasury) have begun this exploration with some success. The GSA Task Force should consider these use cases, in addition to the applicability of existing off-the-shelf AI platforms that can be utilized by the federal acquisition workforce. Offices that should be represented in the task force include GSA’s Office of IT, Enterprise Information and Data Management Division; GSA’s Office of Government-wide Policy, Technology Policy Office; FAS’ Technology Transformation Service, Artificial Intelligence Center of Excellence and Data Analytics Center of Excellence. The task force should also include representation from EPA’s Environmental Purchasing Program to ensure the sustainable purchasing requirements are being applied appropriately.

The potential benefits of using AI to help the acquisition workforce embed sustainability into the procurement lifecycle include:

1. **Improved Market Research:** AI can analyze large volumes of market data to identify sustainability trends, potential vendors, and pricing dynamics. This information can help contract managers make better-informed decisions when soliciting bids or negotiating contracts.
2. **Regulatory Conformance:** AI can help GSA conform to current and changing sustainability expectations in federal acquisition by automating compliance checks and ensuring that procurement processes adhere to requirements.
3. **Improved Decision-Making:** AI can provide data-driven sustainability analytics and insights to help the acquisition workforce make informed decisions. This can lead to better contract management, ultimately improving acquisition outcomes.
4. **Risk Management:** AI can help identify and manage procurement risks. It can flag potential sustainability compliance concerns, assess vendors’ climate risks, and identify irregularities in procurement data, reducing the likelihood of non-compliance.

#### **Next Steps for the Acquisition Workforce Subcommittee and Potential Future Recommendation(s)**

Related to next steps and future recommendations, the Acquisition Workforce Subcommittee plans to explore two areas in the upcoming months:

1. **Structural Alignments:** As GSA implements its change acceleration model, other important structural changes will be needed, including assessing relevant job descriptions to include expectations about the specialized sustainability training. Additionally, the criteria by which new

---

<sup>2</sup> Executive Order 14110 (Oct. 30, 2023).

acquisition professionals are hired may need to reflect new sustainability criteria. These are topics for future exploration by the subcommittee.

- 2. Automation:** In exploring our second priority – to identify the critical levers needed to empower the acquisition workforce to prioritize outcomes/promote sustainability with the least amount of effort – we will further explore opportunities related to new and emerging technologies as a means to realize GSA’s vision to embed sustainability considerations into Federal acquisition.

## **Conclusion**

These four recommendations are intended to further GSA’s critical momentum as it embeds sustainability considerations into Federal acquisition. They represent an important step towards creating a “sustainability mindset” across GSA’s acquisition workforce and creating vital pathways to implement sustainable acquisition.



## INDUSTRY PARTNERSHIPS

As a Committee dedicated to enhancing GSA’s operational reach and efficiency, we established an Industry Partnerships Subcommittee with a vital mission on how best to identify, engage and equip a broader and more diverse supplier base to achieve the government’s goals of sustainability, environmental justice, economic equity, and a resilient domestic supply chain. Specifically, the subcommittee has centered its efforts towards small, midsize, underutilized, and underrepresented businesses, as well as innovative and new entrants. The subcommittee has identified two top priorities for maximizing mission-impact of recommendations explored and ultimately offered for consideration and implementation. First, recommendations will focus on impactful engagements that address the target market and broaden the pool of viable suppliers. Second, recommendations will focus on metrics, motivations and methods that can be developed and deployed to validate meaningful progress, inspire action beyond mere compliance, and share lessons learned and best practices across the federal supplier base.

Based on feedback from GSA and further discovery within the subcommittee, the full Committee puts forth three additional recommendations for GSA’s consideration. Two of the recommendations are refinements of recommendations submitted in May 2023. All three recommendations are designed to send a strong demand signal that GSA is looking to expand and diversify the federal supplier base and that sustainability and climate risk mitigation objectives are an important requirement for all suppliers.

### **Recommendation 5: Use Challenge.gov to Address Climate and Sustainability Priorities**

In May 2023 the GAP FAC submitted the following recommendation for GSA consideration: “The Committee recommends that GSA leverage develop and deploy targeted procurement initiatives under the climate change/sustainability portfolio/umbrella designed to fast track new entrants that can accelerate the current climate progress curve in federal acquisitions.”

Based on feedback from GSA and subsequent discovery, the Committee offers a refined recommendation focusing on an existing mechanism to expand GSA’s search aperture. The federal government has a range of options available to fast track the procurement of goods and services from the private sector to address critical needs. The Committee strongly urges GSA to use one proven tool, Challenge.gov, “where innovators are inspired to meet challenges big and small.”<sup>3</sup> By creating a series of challenges to target new and innovative entrants and invite them to help solve sustainability and climate challenges, GSA can send a strong demand signal that there is an important place in the federal supply pool for these new entrants as well as signal to the emerging companies, new industry micro segments, and investors what is most important to GSA at this time.

Through exploration and discovery, the Committee has learned that it is difficult to expand the federal supplier base with innovative new entrants specializing in leading-edge sustainable products and services. Many of these companies are not part of the pools familiar with government contracting and may have little to no experience working with the federal government or be aware of federal efforts to expand its supplier base. Given the need for greater sustainability and climate risk mitigation progress in federal acquisitions, GSA has an opportunity to send a strong signal that expanded and different approaches are needed to engage with new innovative entrants.

The purpose of this recommendation is to expand the participation of small and midsize, diverse, and innovative firms that can bring to the federal marketplace game-changing technologies, products and services that will advance GSA’s climate and sustainability priorities. It will help GSA leverage its strong federal marketplace role and brand to lower barriers to entry and stimulate the innovator community in this space, as well as find novel solutions that can best address new and expanding

---

<sup>3</sup> <https://www.challenge.gov/>

problems sets. With growing awareness within both government and the private sector, sustainability and climate risk mitigation problems sets are expanding, and the need for effective action is accelerating, making now the right time and place for innovation.

The Committee recommends that GSA use Challenge.gov as a platform for conducting prize competitions to attract new innovators in the sustainability space to the federal marketplace and to expand the awareness of Challenge.gov to small, midsize, and diverse firms in the sustainability and climate risk mitigation marketplace. Challenge.Gov, managed by Technology Transformation Services (TTS), within GSA, supports federal agencies to mature and scale the use of prize competitions and crowdsourcing campaigns in order to engage innovators directly to find solutions to important problems. Hosting challenges also allows GSA to engage with micro market segments that often are not reached by traditional procurement measures. The process is built on five steps:

- Agency identifies pressing problem sets in a special area of sustainability and/or climate risk mitigation in acquisitions (could be product, services or acquisition process).
- Agency formulates a challenge strategy around the problem set and desired outcomes.
- Agency announces a prize competition and invites the public to solve it.
- Participants create and submit solutions to the problem.
- Agency evaluates solutions and awards prizes to the best ones.

Unlike contracts which provide detailed specifications of the work that needs to be done, prize competitions define a smaller set of requirements, which allow participants to bring their creative solutions. The Committee recommends that GSA proceed intentionally to ensure that four key facets are addressed with each new challenge:

#### **Problem Set**

- Solicit across the agency for problem sets where new and innovative suppliers are needed to bring novel solutions.
- Ensure problem sets align with GSA's sustainability and climate risk mitigation goals for federal acquisitions.
- Refine clarity and scope of the challenge to support additional key steps such as evaluation and marketing.
- Ensure desired outcome is clear and easy to articulate to the government and the targeted supplier segment(s).

#### **Process & Evaluation**

- Establish and conduct a transparent, diverse and effective evaluation process.
- Engage appropriate subject matter experts throughout the challenge process.
- Communicate effectively with solver teams.

#### **Marketing**

- Develop a promotion strategy that will maximize the reach for the challenge and effectively target the intended micro segments of the potential supplier base.
- Design appropriate prizes and incentives to attract the target solver community.
- Use traditional and non-traditional channels for challenge outreach.
- Pre-determine avenues to connect challenge winners with federal contract opportunities.

#### **Prize**

- Solicit feedback from targeted segments on what type of prize is most meaningful.
- Establish a clear path for challenge winners to participate in GSA contract opportunities.
- Leverage the entire process (how the challenge is conducted) as an informative learning process for all participants and GSA.

#### **Next Steps for Use of Challenge.gov**

Given that Challenge.Gov is an established and supported channel, the Committee recommends that GSA apply a design thinking approach to proceeding:

- Start small but with the purpose to learn, grow and increase competency in matching innovative solutions to emerging problem sets.
- Solicit feedback and select 2 to 3 pilot challenges that are significant to GSA; this could be the result of an agency wide discovery effort to identify and select candidate challenge opportunities.
- Establish a task group to lead the challenge definition and management process in coordination with the Challenge.gov team.
- Conduct challenges, one at a time, and apply lessons learned after each cycle to continuously improve the process.
- Learn during the entire process - what micro segments exist that were previously unknown, how can the government tap these segments more effectively going forward (not just the winner), better understand how to find and market to unknown microsegments, learn from the diverse set of evaluation participants to include government, domain experts, industry experts, academia resources, investors, etc.
- Based on learnings, refine communication and marketing approach to drive more problem sets channeled through Challenge.gov to search for and find innovative new entrants.

GSA has an excellent existing mechanism to attract innovative new entrants in Challenge.gov. Today's rapidly evolving requirements to address sustainability and climate risk mitigation in federal acquisitions creates a demand for innovation and a need for new entrants in the federal marketplace. Leveraging this existing mechanism creates a logical pathway for GSA to expand its search radius, signal to new entrants that the federal government is looking for them, and more effectively match innovation to some of today's toughest problem sets.

## **Recommendation 6: Create a Task Force or Focus Group for Advancing a Maturity Model**

In May 2023 the GAP FAC submitted the following recommendation for GSA consideration: “The Committee recommends that GSA create, deploy and support an industry-facing maturity model for embedding sustainability and climate risk considerations into federal acquisitions. The faster that more suppliers can better understand how to drive, and be compliant with, delivery of sustainable goods and services and understand why and how to mitigate climate risk in their own businesses, the sooner GSA can meet its goals of maximizing sustainable acquisitions in the shortest period possible, while strengthening the resilience of the government's supply chain.”<sup>4</sup>

The concept of creating an industry-facing maturity model that provides the diverse supplier base a roadmap, standardized taxonomy and resources for increasing capabilities and contributions to sustainability and climate risk mitigation practices in federal acquisitions is widely accepted as a strong recommendation. Equally, it is challenging to grasp the scope and determine first steps for implementation. Based on feedback from GSA and subsequent discovery, the Committee offers a refined recommendation focusing on potential first steps GSA can consider in exploring this recommendation further. From our May 2023 recommendations and through discovery, we learned that there are many strong examples of maturity models being leveraged to help drive a collective body towards goals and desired outcomes. We have also learned that there are multiple efforts underway in several agencies and organizations that could all contribute to a highly effective maturity model relative to sustainability and climate risk mitigation in federal acquisitions.

GSA is well positioned to coordinate and collaborate with other key partners in creating the vision and identifying the most logical pathways for proceeding. GSA, through the lens and power of federal acquisitions, has the opportunity to pull a common thread and lead a collaborative effort to pursue this recommendation further, by creating a task force or focus group to identify the best partners to participate in the sponsorship of the maturity model. GSA may wish to consider three first steps in proceeding with this recommendation.

1. Create a cross-agency task force or focus group to pursue interest. Based on discovery efforts the following organizations are recommended for beginning these discussions:
  - FAS - Category Management Office
  - GSA Office of Governmentwide Policy
  - EPA Center for Corporate Climate Leadership
  - Council on Environmental Quality, Office of the White House
2. Use the Request for Information (RFI) process to solicit third party support to assist GSA in the coordination and development activities. It is not recommended for a third party commercial provider to create and own the model as the government is setting the requirements and controlling the purchasing and should be setting the expectations and defining the pathways for success. Additionally, motivations and measures of a commercial supplier may not always align with those of the government and not all potential suppliers may have the same means to access and participate with a commercial provider.
3. Develop specific recommendations for how GSA can build and enhance partnership and networking with affinity groups, such as ACT-IAC, to participate in the sponsorship, creation,

---

<sup>4</sup> [GAPFAC Recommendations 2023-1 Spring](#)

and communication of the model. There is precedent for success here with the IT Maturity Model to support compliance with the Federal Information Technology Acquisition Reform Act (FITARA). To support the implementation of FITARA, ACT-IAC formed a working group to develop the first IT Management Maturity Model to help agencies assess their maturity in five critical functions of IT management. Since the initial development and implementation of this model in September 2015, additional federal-wide initiatives, policies and legislation were issued that tie directly into the tenets of FITARA and IT management, resulting in updates to the model.<sup>5</sup>

Implementing an industry-facing maturity model for climate and sustainability is not merely a strategic choice but an essential step toward a resilient and responsible future. This framework would provide a comprehensive roadmap for industry partners to navigate challenges and act as a catalyst for better understanding, streamlining processes, ensuring compliance, fostering innovation, and maintaining the highest standards of product/service quality. By embracing this model/framework, industry partners could confidently progress towards sustainability goals, stay ahead of regulatory requirements, and most importantly, demonstrate a commitment to a sustainable future. The benefits are not just theoretical; they are the tangible markers of a smart business strategy and GSA's dedication to responsible practices and long-term success in sustainable acquisition practices.

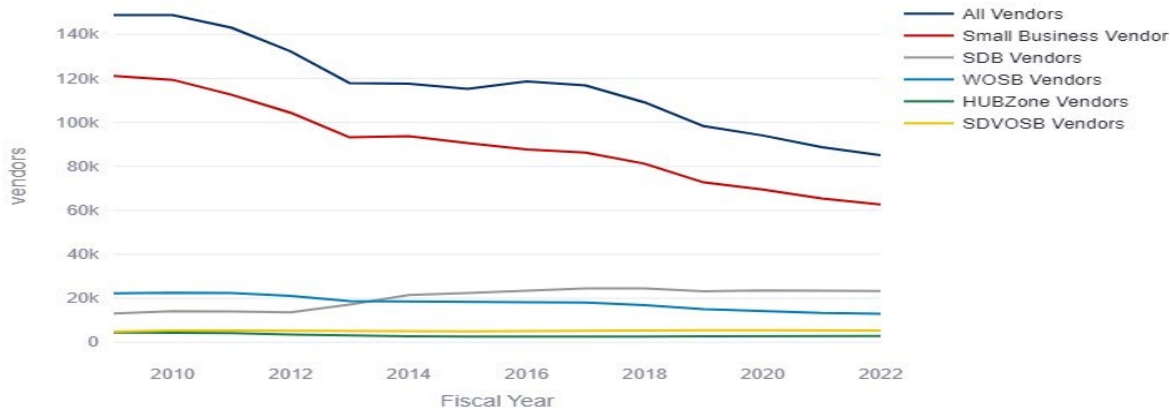
### **Recommendation 7: Create a Council Charged with Planning a “Lighthouse” Network of Networks**

The Committee puts forth a transformative recommendation for GSA to create a networking exchange or community poised to function as a powerful lighthouse, broadcasting signals far and wide across an existing and potential supplier landscape. This initiative is not just a mere collaboration of government and vendors related to climate and sustainability; it's an opportunity to illuminate a diverse spectrum of possibilities for addressing any urgent federal procurement challenges. Creating a vibrant hub will not only strengthen ties within our existing federal ecosystem but also will extend an invitation to new entrants seeking impactful business engagements. This recommendation is a call to action, recommending GSA to construct a “Lighthouse” that guides and attracts partners towards a future of collaboration and success.

There is a critical need to identify, recruit, and retain innovative, emerging, small and underrepresented businesses in specific North American Industry Classification System (NAICS) codes in fields such as sustainability, renewable energy, and climate mitigation and risk management. We are seeing declining numbers of small and underrepresented businesses within the federal market supply chain, and we now need to create systems, structures, and processes that will increase the number of businesses within the supply chain. As depicted in Table 1, the number of small business prime federal contractors has fallen from 121,181 in FY 2009 to 62,670 in FY 2022 a decline approaching 50% over the past 13 years.

---

<sup>5</sup> ACT-IAC: <https://www.actiac.org/>



**Table 1: Source: Federal Procurement Data System (FPDS)**

The purpose of this recommendation is to make federal contracts more accessible to innovative, emerging, small and underrepresented businesses; it is multi-faceted and holds several key objectives:

- Design pathways and retain new entrants in the federal marketplace
- Streamline processes
- Increase diversity and inclusion
- Promote innovation
- Improve partnership opportunities
- Expand public-private collaboration
- Increase awareness of the opportunities within the federal marketplace

Successful efforts associated with this initiative will enhance American global competitiveness and leverage major federal programs such as the [Bipartisan Infrastructure Law \(BIL\)](#), [Inflation Reduction Act \(IRA\)](#), [Creating Helpful Incentives to Produce Semiconductors and Science Act \(CHIPS\)](#), [American Rescue Plan](#), and [Justice40 Initiative](#).

As a first step in creating a Lighthouse – a network of networks – we recommend GSA form a dedicated council to provide direction, support, foster collaboration, and share resources among its members to help build the lighthouse: take it from a vision to systematic pathway for progress and a plan for systematic steps for implementation. This council, which we propose be called the Strategy, Policy & Acquisition Council (SPARC), would be a first step to transform the current engagement community into a dynamic network of networks where businesses interconnect and collectively drive growth and innovation.

Key factors for establishing an effective council:

1. **Goal/Mission** - Ensure the goal and mission of the council is focused on first step activities for further development of the Lighthouse vision and how best to develop the pathways for creation and implementation.
2. **Target Audience** - Ensure the target audience for council leadership and membership is representative of the network of networks to be created, has the resources to commit and has full support of GSA.
3. **Community Establishment** - Ensure a platform or online space is created to support the council and its efforts to recruit members, share information, work collaboratively and build the foundation for the Lighthouse platform.
4. **Strategic Partnerships** - Utilizing strategic partners like those mentioned above is imperative to stay ahead in today's dynamic environment. By collaborating with carefully chosen partners, GSA could tap into a wealth of resources, knowledge, and opportunities.
5. **Engagements/Outreach** - Engagement and outreach are pivotal for building a resilient community, as they are the cornerstone of building lasting and beneficial relationships. New council members would collaborate with GSA to establish effective engagement strategies, which facilitate the expansion of the community's network.
6. **Roles and Responsibilities** - A cooperative and collaborative process fosters a successful partnership between all stakeholders, promoting effective problem-solving, innovation, and exploring new opportunities in climate and sustainability. It emphasizes the importance of open communication, adaptability, and a shared commitment to the mission.
7. **Resources** - The importance of adequate resources cannot be overstated when establishing a thriving networking community. Resources are vital for its growth, sustainability, and impact. Whether it's finances, human capital, technology, or strategic partnerships, these play a pivotal role in enabling the community to achieve its goals and create a platform for collaboration and innovation.
8. **Monitoring and Evaluation** - Implementing a system for ongoing monitoring and evaluation to measure progress and adjust strategies as needed is paramount. Regular updates and reporting are crucial.

#### Challenges:

- **Bureaucratic red tape:** The complexity of the federal procurement process makes it challenging for new businesses to navigate and participate effectively.
- **Regulatory Compliance:** Solicitations/requirements often come with stringent regulations and compliance.
- **Resource Limitation:** Limited financial and human resources.
- **Public Perception and Trust:** Building trust with government agencies and contractors may be challenging, particularly for newer businesses.
- **Time Commitment:** Participation may require a time commitment, which can be challenging for members to balance other responsibilities.

## Opportunities/Benefits:

- Enhanced requirements: Clear expectations and reduced misunderstanding of solicitations.
- Collaboration: Sense of unity, innovation, and increased productivity.
- Feedback loop: Continuous improvement, adaptability, better communication.
- Diversity and Inclusion: Enhanced decision-making and broader talent pool.
- Supply chain: Increased participation of innovative, emerging, small and underrepresented businesses in the federal marketplace.

In implementing the vision for such a community, we propose a phased approach to ensure seamless and effective transition. The following is a high level overview of phases:

- **Planning and groundwork**, laying the foundation for the community's infrastructure.
- **Engaging** early adopters and key stakeholders, building collaborative spirit.
- **Community**, expanding its reach by welcoming a broader supplier base.
- **Continuous optimization** and evolution, ensuring that the network remains a dynamic ecosystem.

The creation of such a vibrant community will serve not only as a beacon for diverse opportunities but also as a testament to GSA's commitment to fostering meaningful connections. By embracing this initiative, GSA positions itself at the forefront of innovation, signaling to expansive suppliers that its door is always open for mutually beneficial partnerships.

Due to the depth of this effort, this recommendation offers only an overview. However, the above key points provide a comprehensive understanding of the relevance of an intentionally focused council (networking community) for recruiting members and onboarding innovative, emerging, small and underrepresented businesses.

## Next Steps for the Industry Partnerships Subcommittee and Potential Future Recommendation(s)

The Industry Partnerships Subcommittee would like to work with GSA on further exploration of these recommendations as needed. Other areas being considered for future recommendations include:

- Accelerating capacity building by creating a digital marketplace of best practices
- Leveraging the power of the large suppliers to drive expansion and capacity by creating incentives for them to partner with small businesses and new entrants.
- Providing a higher level of data access, fidelity and transparency on climate progress.
- Developing collaboration/performance metrics for measuring effectiveness of engagement.



## POLICY & PRACTICE

In an era marked by accelerated environmental awareness and an increasing global commitment to fostering sustainable acquisition practices, the GSA must lead by example. It is incumbent upon GSA to adopt strategies that promote public health and foster sustainability innovation. The Committee hereby presents a comprehensive set of recommendations designed to advance sustainability in federal acquisition, addressing critical issues related to the presence of per- and polyfluoroalkyl substances (PFAS), human health risks due to chemical exposure, and the establishment of a Sustainable Procurement Center of Excellence.

The first recommendation advocates for GSA to initiate comprehensive processes aimed at identifying products that may contain PFAS. PFAS, known for their persistence and potential adverse effects on human health and the environment, pose a significant concern in the realm of federal procurement. To address this, the GSA is encouraged to proactively reduce the acquisition of products containing PFAS in future federal procurements through the implementation of specific tools and strategies that increase awareness, disclosure, and visibility to reduce the acquisition of products containing PFAS.

The second recommendation underscores the need for the GSA to develop improved procurement processes specifically focused on mitigating human health risks associated with federal procurement purchases. This involves instituting science-based review and evaluation mechanisms, mandating ingredient and chemical disclosure, utilizing exposure and hazard information in decision-making, and establishing preference hierarchies that prioritize products with lower environmental and health impacts. Such an approach ensures that federal procurement aligns with the latest scientific insights, promoting the well-being of both citizens and the workforce while fostering a market demand for safer, more sustainable products.

The third recommendation proposes the establishment of a Sustainable Procurement Center of Excellence led by GSA. This center will serve as a dedicated hub to educate stakeholders, accelerate innovation in sustainable procurement practices, share pertinent information, establish best practices, and function as a valuable resource for all federal agencies as well as state, tribal and local municipalities seeking to advance sustainability in their acquisitions. By centralizing expertise and fostering collaboration, the Center of Excellence will catalyze a cultural shift towards sustainable procurement practices across the public sector, ensuring a harmonized and effective approach to achieving long-term sustainability goals.

In summary, these recommendations collectively present a roadmap for the GSA to make significant strides in advancing sustainability within its procurement practices. Through targeted action and collaboration, GSA can lead the charge in transforming federal acquisition into a model of environmental responsibility, public health stewardship, and sustainable innovation.

### **Recommendation 8: Reduce PFAS in Federal Procurement**

The Committee recommends that GSA promptly begin processes to identify products that may contain per- and polyfluoroalkyl substances (PFAS)<sup>6</sup> in current federal procurement and to minimize acquisition of products that may contain PFAS in future federal procurement by targeting and updating language in all applicable government contracts and procurement tools. These processes can build on

---

<sup>6</sup> The definition of PFAS is variable across the federal government. GSA should decide which definition to use in consultation with other federal agencies to ensure consistency across the federal government respecting procurement.

GSA's existing efforts to eliminate PFAS in federal procurement via its Green Procurement Compilation and Sustainable Facilities Tool ([www.sftool.gov](http://www.sftool.gov)).

This initial recommendation is consistent with our mandate to recommend actionable changes that encourage innovation and accelerate the demand and utilization of goods and services to achieve measurable progress on climate and sustainability goals. This document derives from, among other things, the critical need for leadership on this issue, the timeliness of GSA's ongoing efforts to address PFAS, a recent petition to GSA<sup>7</sup>, and public support for action addressing this pressing issue. In addition to a call to action, this document briefly summarizes the problems with PFAS in the supply chain generally and federal procurement particularly, offers recommendations, articulates specific areas for policymaking and experimentation, and highlights specific items or topics that require special attention from GSA in crafting any future rule.

### **The Problems with PFAS:**

- PFAS has been produced and used since the 1940s as thousands of different chemical substances and in numerous applications that grew over time. During most of this time, being unregulated until recent years, PFAS has entered the environment and hydrological cycle and will be detected wherever anyone looks and samples.
- Certain PFAS substances are known to be harmful to people when ingested in significant concentrations over a period of time (e.g., contaminated drinking water). The science and toxicology of PFAS are emerging and showing that PFAS may be harmful to people at extremely low concentrations (i.e., parts per trillion or less). This makes imperative phasing out of PFAS production, limiting demand and uses for it, and protecting people currently and potentially exposed.
- PFAS are known to have been used in the following industries/applications<sup>8</sup>: aviation and aerospace; automotive; biocides (herbicides and pesticides); biotechnology; building and construction; cable and wiring; chemical industry; cosmetics/personal care products; electronics; energy; explosives, propellants, guns, and ammunition; firefighting/safety; food processing; household and cleaning products; medical products; metal plating; oil production; mining; nuclear industry; oil and gas industry; paper and packaging (including for food); pharmaceutical industry; photographic industry; PFAS production; photolithography & semiconductor; plastics and rubber; recreational and musical equipment; recycling and material recovery<sup>9</sup>; refrigerants<sup>10</sup>; textiles (upholstery, carpets, and furniture), leather, and apparel; wood industry. Many, if not most, of these applications are relevant to federal procurement. It is a certainty that PFAS has been acquired, intentionally or not, via federal acquisition. However, knowledge of where PFAS exists within federal facilities and operations is very limited.

### **Purpose of the recommendation:**

- As the largest purchaser in the world, spending close to \$700 billion annually on goods and services, the U.S. government has a tremendous opportunity through federal procurement to reduce demand for PFAS and acquisition of PFAS into federal facilities and operations.

<sup>7</sup> Letter dated December 21, 2022 to GSA Administrator Robin Carnahan from 25 interested organizations and businesses "urging GSA to actively lead the federal government in curbing procurement of products containing [PFAS]".

<sup>8</sup> Interstate Technology Regulatory Council. "Technical Resource of Addressing Environmental Releases of Per- and Polyfluoroalkyl Substances", Table 2-6. September 2023. <https://pfas-1.itrcweb.org/2-5-pfas-uses/>.

<sup>9</sup> "Fluorosurfactants are used to recover metals, including rare earth metals, and n-hexane from waste gasses."

<sup>10</sup> Some definitions of PFAS include refrigerants (e.g., the recent final definition of PFAS under TSCA Sec. 8(a)(7); see [40 CFR 705.3](https://www.ecfr.gov/current/title-40-chapter-I-subchapter-B-section-705.3)).

- The U.S. government has recognized PFAS as a human health and environmental issue. For instance, EPA has developed a PFAS Strategic Roadmap to research, restrict, and remediate PFAS.<sup>11</sup> The Department of Defense has undertaken steps to reduce certain uses of PFAS in its operations and to investigate and clean-up PFAS releases from its operations.<sup>12</sup>
- Activities to reduce federal procurement of PFAS are currently underway and may be required to some degree in the near future via federal legislation. EPA maintains information about standards and ecolabels that address PFAS among its [Recommendations of Specifications, Standards, and Ecolabels for Federal Purchasing](#) to facilitate federal procurement of products that do not contain PFAS. In the current U.S. Congress, a Senate bill entitled “[S. 2283 - PFAS-Free Procurement Act of 2023](#)” would prohibit, starting October 1, 2025, any executive agency head from “entering into a contract for the procurement of cookware, utensils, carpets, or furniture that contain perfluorooctane sulfonate (PFOS) or perfluorooctanoic acid (PFOA).” A House bill entitled, “[H.R. 5260 - PFAS Free Military Purchasing Act](#)”, would impose similar prohibitions as those in S. 2283 on the Secretary of Defense through April 1, 2025 and then on that date expand prohibitions to include many more PFAS (e.g., GenX) and to cover more products (e.g., food-packaging materials and sunscreen).
- Legislative and policy initiatives to reduce PFAS such as these require codification and reinforcement with the formulation of specific procurement and acquisition practices that advance the goal of a PFAS-free supply chain.
- GSA, through its Public Building Service, is the nation’s largest landlord, and as such can set policies and requirements governing the construction, occupancy and management of an enormous portfolio of commercial and residential buildings. Additionally, GSA’s Federal Acquisition Service serves as America’s only source solely dedicated to procuring goods and services for the government. This places GSA in the position of driving policies for PFAS-free commercial and residential properties for a large sector of the economy.

### **Overview of current practices used by the federal government to procure “green” products and services:**

- Federal purchasers are directed to procure sustainable products and services per [Executive Order 14057](#), [OMB Memo 22-06](#) and the [Federal Sustainability Plan](#). Purchasers must meet all applicable statutory mandates and to the maximum extent practicable, purchase sustainable products and services identified or [recommended by EPA](#).
- The Federal Sustainability Plan and OMB Memo 22-06 directs federal purchasers to prioritize the procurement of products that do not contain PFAS. The Executive Order Implementing Instructions expands the definition of “PFAS-containing covered items” to go beyond just eliminating PFOS or PFOA and directs agencies to “consider other PFAS used in commercial products for purposes of government-wide efforts to avoid PFAS in procurement.”
- In addition to achieving evolving sustainable purchasing requirements, the federal acquisition workforce is historically and currently understaffed and burdened with innumerable (often competing) legislative and regulatory policy mandates, including many social and economic considerations. The acquisition workforce often does not have knowledge or appropriate training to implement the often-complex sustainability topics such as PFAS in products. The sustainability professionals working on these topics are often in separate offices or agencies and

<sup>11</sup> U.S. EPA. “PFAS Strategic Roadmap: EPA’s Commitments to Action: 2021–2024”. [https://www.epa.gov/system/files/documents/2021-10/pfas-roadmap\\_final-508.pdf](https://www.epa.gov/system/files/documents/2021-10/pfas-roadmap_final-508.pdf).

<sup>12</sup> U.S Department of Defense. “Per- and Polyfluoroalkyl Substances (PFAS): A National Issue that Requires National Solutions”. <https://www.acq.osd.mil/eie/ceer/ecc/pfas/>.

not properly consulted during the acquisition process. Any acquisition policy addressing PFAS must be clear, unambiguous and easy to administer for the acquisition workforce.

### **Initial Recommendations:**

GSA should move forward with reducing PFAS through government procurement. A set of priority strategies to address PFAS in procurement is outlined below, organized into the following categories:

- When determining which specific products to be prioritized for procurement, GSA should consider product categories that have already been identified by other state and federal programs. Examples include:
  - Products identified in existing procurement policies within the executive branch (e.g., NDAA requirements).
  - Products identified in proposed federal legislation as well as state laws, including but not limited to: furniture, carpets, rugs, curtains, cookware, food service ware, food packaging materials, cutlery, dishware, paints, cleaning products, stain and water resistant treatments, flooring, and floor care products.
  - Products identified via the European Commission’s proposed [essential-use concept](#).
- The specific PFAS to be addressed through procurement might vary depending on the product category. GSA may need to ascertain which PFAS to address more generally, which should go beyond simply addressing PFOA and PFOS and may include a phased approach.
- Role for ecolabels:
  - Rather than creating a new single attribute ecolabel or certification focused on PFAS, the federal government should continue to utilize ecolabels as a method for identifying products that do not contain PFAS, ideally, by leveraging existing multi-attribute environmental performance standards and/or ecolabels to ensure this important issue is addressed alongside other key environmental and human health issues across the lifecycle of a product or service (e.g. plastics reduction, other chemicals of concern, embodied carbon, etc.).
  - Safer Choice is a voluntary EPA program that helps consumers, businesses, and purchasers find cleaning and disinfectant products that perform and meet stringent EPA criteria for effects on human health and the environment, including not containing intentionally added PFAS. The Safer Choice program has announced that it is considering expanding into additional product categories that it identifies as priority products.
  - EPA also manages a list of ecolabels that are required to be used within federal procurement and has created a [filter](#) to show which of the recommended ecolabels are already addressing PFAS. EPA only highlights criteria which address PFAS as a class; criteria only addressing PFOA and/or PFOS are not highlighted. EPA will continue to expand into new product categories and will evaluate if/how many new ecolabels address the issue.
  - If there are existing ecolabels in key product categories that are not appropriately addressing PFAS at this time, EPA and/or other federal agencies may consider engaging in the standards development process to advocate for an update or creation of new criteria.

- The ecolabels that have been identified by EPA to restrict or eliminate PFAS should be incorporated into all applicable GSA tools and contracts, prioritizing contracts that are coming up for renewal.
- Incorporate ecolabels that restrict or eliminate PFAS into GSA procurement tools for ease of use:
  - Add additional filters or icons to GSA Advantage’s environmental program aisle.
  - Add additional references of education components into GSA’s Green Procurement Compilation.
  - Add a “PFAS” filter to GSA’s SFTool Product Search.
  - Explore how to best incorporate into the platforms being utilized in GSA’s Commercial Platform effort (e.g., Amazon Business, Fisher Scientific, Overstock.com).
  - Explore updating other procurement tools throughout the procurement process.
- Address PFAS through updating contract language:
  - Identify the applicable government contracts where the prioritized products are purchased and phase in PFAS prohibitions as part of contract renewal or placement.
    - Include timing for when the next update cycle for the contract is happening.
    - Identify the contract officer lead for each contract to ensure coordination.
    - Draft sample contract language in collaboration with EPA or other sustainability experts which will vary depending on product category.
  - Focus on GSA’s Multiple Awards System (MAS) program as a start, as it is the most far-reaching contract vehicle in current use. Coordinate placement of new contract requirements throughout Governmentwide Acquisition Contracts (GWACs) and Multi-Agency Contracts (MACs) as well as other best-in-class contract vehicles.
    - Disclosure: Currently, MAS solicitations require that the offeror list hazardous material items in clause 52.233-3 and Material Safety Data Sheets (MSDSs) to be submitted for any item listed under that clause, which becomes part of the contract award and is required to be updated by the contractor if the information changes. Consider whether PFAS, or a subset of PFAS, can be added to the clause to require disclosures regarding products that contain PFAS.
    - Prohibition: Require a representation by offers of items or products for listing on the MAS that the offeror is not providing an item or product that contains intentionally added PFAS for certain product categories where safer alternatives to PFAS are readily available and cost competitive. Consider a phased and transparent approach for selecting and building upon product categories, prioritizing products that have been identified in NDAA’s and state laws.
  - As a longer term action, initiate a FAR case to develop the terms and conditions that all contracts should follow in regards to PFAS. Consider issuing a government-wide Class Deviation that prohibits intentionally added PFAS in the supply chain where alternatives are available.
- Supplier Reporting:

- Conduct supplier outreach by asking GSA suppliers whether certain products or product categories contain PFAS. More formally, this could be a Request for Information (RFI) from GSA to ascertain supplier knowledge regarding which products contain PFAS and what efforts are being taken by GSA suppliers to identify products that contain PFAS and to reduce or eliminate PFAS in those products. Such an RFI would be within the market research phase and would send a market signal regarding the importance of this issue to GSA.
- Expand tracking in GSA's System for Award Management (SAM) to include tracking and transparency of products covered by EPA recommended ecolabels that sufficiently address PFAS.
- Use information on supplier past performance via Contractor Performance Assessment Reporting System (CPARS) to take into account past performance in reporting with regard to PFAS.
- Supply chain incentives:
  - Challenge Prize competition for alternatives to PFAS in textiles (or other product category).
  - Challenge or prize competition for acquisition professionals to encourage them to make updates to their contracts that would reduce the procurement of products that contain PFAS.
  - These challenge competitions may be coordinated with Recommendation 5 (above) to use Challenge.gov to attract new innovators.
- Training:
  - Develop in-house sustainability expertise, in coordination with the new Sustainable Procurement Center of Excellence recommendation (Recommendation 10, discussed below).
  - Include PFAS-free guidelines into existing acquisition workforce training programs, such as the Federal Acquisition Institute, National Defense University and other training centers.
  - Update each agency's contracting desk book. The desk book provides agency-level acquisition regulations, policies, procedures, guidance, and information.
  - This work aligns with the Committee's May 2023 recommendations to make sustainability a core foundational capacity across the acquisition workforce and create acquisition sustainability experts through a new sustainability certification.

### **Considerations:**

- The federal acquisition workforce is historically and currently understaffed and burdened with innumerable (often competing) legislative and regulatory policy mandates, including many social and economic considerations, and therefore clear and unequivocal guidance is essential.

- GSA and other agencies should seek to avoid unintended consequences, such as regrettable substitutions or other important environmental and human health issues not being addressed in a particular product.
- Exemptions should be considered for national defense, disaster recovery, disability accommodations, medical use, and personal protective equipment.

### **Illustrative Examples of Federal Agency Efforts to Reduce PFAS:**

- In January 2023, DoD's recent MilSpec for fluorine-free foam (F3) (e.g., [MIL-PRF-32725](#)) is meant to replace Aqueous Firefighting Foam (AFFF) and sets a threshold for maximum allowable PFAS content at 1 part per billion and provides test methods for performance as well as PFAS content. This is an example of testing mandated by contract language. This implements section 322 of the NDAA of 2020.
- In April 2023, DoD issued [DFAR Class Deviation](#) to be added as a provision in all solicitations for the acquisition of commercial products and commercial services for nonstick cookware and upholstered furniture and carpets stating that DoD may not procure cover items that contain PFOS or PFOA. The representation states "By submission of its offer, the Offeror represents that it is not providing as part of its offer any covered items containing PFOS or PFOA" and implements section 333 of the NDAA of 2021. (Note: PFOS and PFOA have declined in use and have been replaced by other PFAS, thus subsequent NDAAs have attempted to increase the breadth of PFAS listed in such prohibitions.)
- In September 2023, the Consumer Product Safety Commission (CPSC) published a [notice to request information](#) on PFAS used in commerce or potentially used in consumer products, potential exposures associated with the use of PFAS in consumer products, and potential health effects associated with exposures to PFAS from their use in consumer products. This provides a good example of a RFI seeking additional information on PFAS.
- In October 2023, the United States Department of Agriculture (USDA) updated their [Contracting Desk Book](#) section on Evaluation Factors and Significant Subfactors to include an example regarding PFAS which will require offerors of certain products to describe steps taken to assure that PFAS are not included or are minimized in products provided. The Desk Book was also updated to include a section on PFAS as an environmental consideration and links to EPA's recommended standards and ecolabels as a resource.

### **Conclusion:**

- The U.S. government should seize this opportunity to leverage the power of federal procurement spending to reduce PFAS in procurement.
- GSA should develop a plan with a timeline to take an ambitious approach to address PFAS, including which products will be prioritized. The focus of GSA's plan should be to include these interwoven themes:
  - Gather information: Conduct outreach by asking GSA suppliers whether certain products or product categories contain PFAS and whether the suppliers have plans in place to address PFAS.
  - Improve training and expertise: Create in-house expertise on acquisition sustainability specific to PFAS and collaborate with other agencies with subject matter expertise.

- Update GSA tools: Update existing procurement tools to screen for and reduce the procurement of products that contain PFAS where alternatives are available.
- Update GSA contracts: Update contracts, including through GSA's Multiple Awards System, to reduce the procurement of products that contain PFAS where alternatives are available.
- Measure Results: Track, measure, and report the results of these actions.

## **Recommendation 9: Reduce Environmental and Human Health Risks Associated with Federal Procurement**

Ensuring the safety of federally procured products and addressing the potential risks from possible exposure to chemicals are important objectives to incorporate into the federal procurement process. There are several federal agencies which have responsibility for reviewing chemical substances for safety (e.g., EPA, FDA, OSHA), and this information can be leveraged by GSA to inform its procurement processes. There is a notable gap in chemical and ingredient disclosure by suppliers. Such disclosure is necessary for assessing exposures to chemicals for users of procured products and for developing procurement strategies and processes for reducing exposures. Improving ingredient disclosure will support more informed decision-making on product selection and purchasing.

This recommendation provides guidance on how GSA can take meaningful next steps to develop improved procurement processes to reduce adverse impacts of procured products on the environment and the health of product users in the federal government. To effectively accomplish this objective, it will be key to develop procurement process(es) informed by science and for suppliers to disclose chemical and ingredient information about their products. This disclosure information would be used in combination with existing toxicity and exposure information available to GSA (e.g. through EPA and FDA) to reduce human health risks from procured products. As the GSA begins to collect and consider the chemical and ingredient information, it will be important to understand that government agencies, like the U.S. Centers for Disease Control and Prevention, recognize that an individual's risk of harm depends on the presence of a hazardous chemical, exposure to it, and susceptibility to it, so implementing an approach that incorporates current knowledge about these factors will be imperative if GSA is to work toward recommending changes to the types of products being purchased.

### **Considerations:**

- The federal acquisition workforce is historically and currently understaffed and burdened with innumerable (often competing) legislative and regulatory policy mandates, including many social and economic considerations, and therefore clear and unequivocal guidance is essential.
- Unintended consequences, such as regrettable substitutions or other important environmental issues not being addressed in a particular product, should be avoided.

### **Approaches of Recommendations:**

- Apply science-based principles and practices, in coordination with other federal agencies, in the review and evaluation of materials and products to support the procurement of sustainable products that advance climate and human health goals.



- Improve and pilot procurement processes that establish protocols for suppliers to disclose ingredients and their chemical composition.
- Incorporate, where feasible, exposure and toxicity data to inform the selection of materials and products.
- Work towards setting a hierarchy of preferences that encourage the procurement and use of materials and products that present a lower risk to human health and the environment based on a consideration of their hazard and exposure profiles.

### **Examples of some current practices used by federal or state governments to evaluate toxicity and exposure information in the assessment of products or materials:**

- The [EPA's Toxic Substances Control Act \(TSCA\) program](#) conducts risk evaluations to determine whether a chemical substance presents an unreasonable risk to health or the environment, under the conditions of use, including in products. As part of this process, EPA evaluates both hazard and exposure, uses scientific information and approaches in a manner that is consistent with the requirements in TSCA for the best available science, and ensures decisions are based on the weight-of-scientific-evidence.
- The [EPA's Safer Choice Program](#) offers a voluntary label for products to verify that their ingredients meet the EPA's "strict safety criteria for both human health and the environment, including carcinogenicity, reproductive/developmental toxicity, toxicity to aquatic life, and persistence in the environment."
- The [Washington State Department of Toxic Substances Control \(DTSC\) has a program](#) focused on reducing the use of hazardous chemicals and accelerating the use of "safer" products and alternatives. Every three years it issues a Priority Product Work Plan, which defines the product categories that DTSC plans to evaluate. The priority products are usually specific product-chemical combinations that have the potential to expose people or the environment to one or more candidate chemicals. It requires the conduct of a comprehensive alternatives analysis to answer key questions such as: Is this chemical of concern necessary in the product? Is there a safer alternative?
- [New York State Office of General Services has a program](#) which provides tools and requirements to help facilitate the purchasing of products that meet GreenNY specifications. Their program works to identify product criteria that will: (a) reduce or eliminate the health and environmental risks from the use or release of toxic substances; (b) minimize the risks of the discharge of pollutants into the environment; (c) minimize the volume and toxicity of packaging; (d) maximize the use of recycled content and sustainably managed renewable resources; and (e) provide other environmental and health benefits.

### **Recommendations:**

- **Priority Categories:** GSA should identify a subset of procurement categories (e.g., building materials, cleaning supplies, etc.) to pilot the inclusion of preferred procurement criteria for products that include chemical ingredient disclosure. To accomplish this, GSA should assess the current availability of chemical disclosure reporting for priority product categories and establish pilot procurement strategies that include ingredient reporting protocols. For example, it should develop a list of priority product categories (e.g., electronics, office seating/cabinetry/desks) and work to collect information on specific chemicals that are contained in those products. [Health product declarations \(HPDs\)](#) are used as an ingredient disclosure tool to report on chemicals of concern in building construction materials; this report type can serve as a reference point for

developing pilots that prioritize procurement of non-toxic materials. The [GSA Sustainable Facilities Tool \(SFTool\)](#) currently includes products that have HPD documentation.

- **Priority Substances:** GSA should work with relevant federal agencies (e.g. EPA) to develop a list of chemistries that are currently being evaluated as high priorities and the product categories that are being evaluated and considered by those federal agencies. For example, when EPA has completed its evaluation of a product category or condition of use involving a specific chemistry and has identified unreasonable risk, GSA should prioritize those products and chemistries for further review and opportunities for alternatives analysis. For building materials, a list of chemicals of concern has been developed by the International Living Future Institute (ILFI). [This list](#) could serve as a starting point for GSA's efforts.
- **Build on Existing Frameworks:** When feasible and practical, the GSA should work with relevant federal agencies to incorporate available alternative assessments that have been developed or are being developed by other agencies (e.g., EPA's Safer Choice Program, EPA's TSCA program, or EPA's Framework for the Assessment of Environmental Performance Standards and Ecolabels). There are several federal agencies which conduct alternative analysis and assessment of chemistries and product categories. Safer Choice is EPA's label for safer chemical-based products (it was included in the definition of *Sustainable products and services* in the [proposed rule on Sustainable Procurement](#)). EPA's Safer Choice program assists consumers, businesses, and purchasers in finding products that perform and contain ingredients that may pose a lower risk to human health and the environment. While this program is mainly focused on cleaning supplies and products, it may serve GSA as an example of a program that contains useful information to consider when seeking to identify more environmentally preferable or products which have additional sustainability attributes. EPA's Framework contains several criteria to assess how private sector environmental performance standards and ecolabels reduce and/or eliminate chemicals of concern in products.
- **Pilot Projects:** Once the above priorities have been established, GSA should move toward implementation and institutional capacity building through pilot projects. Pilot projects should be designed to accelerate procurement of products with reports or eco-labels documenting chemical ingredient composition. Pilot projects can be implemented in partnership with relevant federal agencies, such as EPA or FDA. Preferred purchasing language or qualification criteria are two procurement approaches that may be used to pilot chemical composition disclosure.

### **Recommendation 10: Establish a Sustainable Procurement Center of Excellence (SPCoE)**

The Committee recommends that GSA establish a Sustainable Procurement Center of Excellence (SPCoE) to foster a dynamic exchange of information among the GSA, other agencies, states, tribal governments, and local municipalities. The SPCoE will serve as the national authority on sustainable acquisition, establishing best practices, providing support, identifying opportunities for collaboration, and seeking uniformity wherever possible to maximize the impact of sustainable procurement.

This recommendation is a call to action and establishes the urgent need for a SPCoE, describes examples and potential models for its structure, and suggests specific areas for contemplation by GSA in the creation of its SPCoE.

### **The Challenge**

The Biden Administration has challenged the GSA to implement sustainable procurement.<sup>13</sup> State and local municipalities have similarly been challenged, adopting a diverse cadre of policies and approaches to meet their own sustainability goals. According to the National Association of State Purchasing Officials 2022 Survey of State Procurement Practices, 28 states have statewide green products contracts, 20 states have green purchasing policies or programs, 15 states have an executive order mandating green purchasing/sustainability initiatives and goals, and 8 have set-asides or price preferences for green products and services.<sup>14</sup> This rapid and ongoing evolution of state sustainable acquisition policies has led to innovation and diversity in execution, with each jurisdiction utilizing different tools in their respective pursuits.

To tap into this era of innovation, the Policy and Practice Subcommittee held a series of discussions with state procurement officials and organizations that consult on sustainable procurement. These conversations identified several innovations for potential adoption by the GSA, but more urgently identified the potential to amplify and maximize sustainable acquisition outcomes with formal coordination between state and federal procurement practitioners. And to date, no forum exists for communication or coordination - despite the mutual desire and clear benefits of doing so.

### **The Center of Excellence Model (CoE)**

According to the Project Management Institute, an organization's Center of Excellence (CoE) is "a group of people with specialized skills and expertise whose job is to provide leadership and purposely disseminate that knowledge within your organization".<sup>15</sup> A procurement CoE is "a specialized team that provides leadership, training, and support to improve procurement best practices across an organization."<sup>16</sup>

The GSA has utilized the CoE approach to accelerate and advance IT modernization. The GSA IT CoE has been used successfully for years to provide a cross-functional surge in expertise to agencies that are modernizing their IT and related operations. This approach corrals the GSA's internal resources to advance important policy initiatives.

The Department of Homeland Security has adopted an approach to their own CoE which includes defined interaction with external stakeholders. The DHS CoEs are "university led research networks that anticipate threats and challenges to the homeland and operations." They are designed to complement DHS research and development programs, take advantage of other federally-sponsored research, and, most relevant here, "provide outcomes useful to federal, state and local governments, private sector, and international partners."<sup>17</sup>

Central to the DHS approach is the belief that security-related issues are not defined by federal, state or local jurisdictional or geographical boundaries. Security is a shared responsibility, and the best approach to community solutions is a collaborative approach. Similarly, sustainability is a global issue, with no differentiator between state, local or federal jurisdictions. As such, the DHS approach, including external stakeholders as primary members of its CoE, provides a more analogous model for GSA to follow. This collaborative approach will bring broad and diverse expertise to the SPCoE.

---

<sup>13</sup> "FACT SHEET: President Biden Signs Executive Order Catalyzing America's Clean Energy Economy Through Federal Sustainability." 2021. The White House. [FACT SHEET: President Biden Signs Executive Order Catalyzing America's Clean Energy Economy Through Federal Sustainability | The White House](#)

<sup>14</sup> "2022 Survey of State Procurement Practices Report." n.d. NASPO. Accessed December 18, 2023. [2022-Survey-of-State-Procurement-Practices-Report.pdf \(naspo.org\)](#)

<sup>15</sup> "Centers of Excellence | Disciplined Agile." n.d. PMI. Accessed December 18, 2023. [Centers of Excellence | Disciplined Agile \(pmi.org\)](#)

<sup>16</sup> "Procurement Center of Excellence." n.d. Fairmarkit. Accessed December 18, 2023. [\(fairmarkit.com\)](#)

<sup>17</sup> Department of Homeland Security - Science and Technology. 2023. "Welcome to the Centers of Excellence." Homeland Security. [Centers of Excellence | Homeland Security \(dhs.gov\)](#)

U.S. Customs and Border Protection (CBP) has established ten CoEs to focus on industry-specific issues and provide tailored support for importers. The concept of the CBP CoE was developed as a result of discussions with the Advisory Committee on Commercial Operations of U.S. Customs and Border Protection (COAC), a committee similar to this GAP FAC. The need for the CBP CoEs arose in response to claims that CBP's port-by-port trade processing authority resulted in disparate processing treatment for similar goods at different ports of entry, which caused trade disruptions, increased transaction costs, and information lapses for both CBP and the importer. CBP established the Centers to facilitate trade, reduce transaction costs, increase compliance with applicable import laws, and achieve uniformity of treatment at the ports of entry.<sup>18</sup> The GSA SPCoE should similarly strive for uniformity with state, local and tribal governments wherever possible to maximize the impact of sustainable acquisition.

GSA SPCoE will incorporate the best examples from other federal agencies and consist of a cross-jurisdictional team of procurement experts that improves coordination amongst public bodies and provides leadership, training, guidance and assistance to develop and disseminate best practices to help embed sustainable procurement into public procurement policies, practices and procedures. It will be a resource, a think tank - a source for ideas, a place to share and coordinate so that procurement practitioners can speak with a unified voice and learn from one another.

The SPCoE could also serve as a hub for information about third-party training opportunities related to climate mitigation and sustainable public procurement (see Recommendation 1 above), in addition to being a central point of access for information related to technology tools that can facilitate sustainable acquisition. The only other SPCoE identified at this time is a creation of the government of Wales. It is currently in the testing phase but may soon provide lessons from which GSA can also benefit.<sup>19</sup>

### **Purpose of the recommendation:**

- The federal government is responsible for nearly \$700 billion of annual spend and through purchasing decisions can achieve sustainability goals and targets by moving markets through the intelligent use of certain tools.
- State and local governments spent \$3.5 trillion on direct general government expenditures in fiscal year 2020.<sup>20</sup> The cumulative power of channeled and consistent federal, state and local policies, practices and tools can amplify the effect of collective spending power to effectuate sustainable outcomes.
- GSA is already the national leader and a model for sustainable acquisition to many state and local procurement entities. The SFTool, the Environmental Aisle, the Green Procurement Compilation and many other resources already support state and local efforts to embed sustainability into their acquisition processes. A SPCoE is the natural evolution of a role GSA already plays, but has not fully embraced or formalized.
- A Sustainable Procurement Center of Excellence will provide a forum for the exchange of ideas and best practices to effectuate national sustainability goals, and rapidly advance the incorporation of sustainability into the procurement process of all levels of government.

<sup>18</sup> Department of Homeland Security, U.S. Customs and Border Protection, Regulatory Implementation of the Centers of Excellence and Expertise, 81 Fed. Reg. 92979 (December 20, 2016)

<sup>19</sup> CYD Beta Testing. CYD Procurement: Home. Accessed December 18, 2023. [Home - CYD Procurement](#)

<sup>20</sup> "State and Local Expenditures." n.d. Urban Institute. Accessed December 18, 2023. [State and Local Expenditures | Urban Institute](#)

- In certain areas, such as the setting of national green specifications, GSA could do more by setting a national standard and providing a definitive national platform upon which states can follow and develop their own unique specifications.

**Recommendation:**

GSA should move forward with creating a SPCoE. In so doing, GSA should consider the DHS and CBP approaches, acknowledging sustainability as a shared responsibility, including external stakeholders such as state procurement officials and striving to achieve uniformity to facilitate consistency in how sustainable acquisition is implemented nationally. With these concepts, the GSA should establish a charter and mission for a SPCoE that incorporates:

- The identification of best practices to implement sustainable procurement at the state level with potential applicability at the federal level.
- The creation of working groups to identify areas where uniformity or standardization could be beneficial to enhance sustainable outcomes
- The creation of a pathway for state and local government procurement officials to formally request guidance or enhancements for new or to existing sustainable procurement tools.
- A resource center to provide support across GSA and to other agencies regarding the implementation of sustainable procurement, training, practice materials, tips and tools.

**Conclusion:**

GSA should urgently take all steps necessary to establish the first SPCoE. This center would serve as the national authority on sustainable acquisition, establishing best practices, providing support, identifying opportunities for collaboration, and seeking uniformity wherever possible to maximize the impact of sustainable procurement.