



California Department of General Services
707 3rd Street
West Sacramento, CA 95605

Date: February 22, 2019

Attn: Engineering-DGS

Re: Response from the National Glass Association on Behalf of its Flat Glass Manufacturing Members Regarding Facility Specific Data for the Implementation of CA AB 262

In further response to the invitation of the State of California Department of General Services (“DGS”), the National Glass Association (“NGA”) Forming Manufacturer Members (formerly the Flat Glass Manufacturing Division or FGMD) submits its written comments in response to DGS’s request for facility specific data for the implementation of CA AB 262, also known as the Buy Clean California Act, as amended by AB 1817.

NGA is a nonprofit, tax-exempt trade association based in Vienna, VA, and submits these comments on behalf of its four-member companies¹ engaged in manufacturing over 80% of the “flat glass” in the US.

NGA’s Forming Manufacturer members do not plan to invest resources into developing facility-specific EPDs for the following reasons:

- 1) AB 262 defines “flat glass” as clear or tinted float and rolled glass without additional processing such as coatings, tempering, and laminating. Processed glass products procured for installation into State of California funded building projects fall outside the scope of the California Bill AB262. Separate product category rules (PCR) and Environmental Product Declaration (EPD) requirements apply to “flat glass” vs. “processed glass.”
- 2) The disclosure of facility specific rather than product specific environmental impact data will result in the disclosure of business sensitive confidential data that could be used in ways that would be competitively disadvantageous. NGA and its Forming Manufacturers are highly conscientious regarding avoidance of exchange of information that could be used for anti-competitive purposes.

¹ The four-member producers of flat glass are AGC Glass North America, Guardian Glass, NSG Group (formerly Pilkington North America) and Vitro Architectural Glass (formerly PPG Glass).

² Glass Association of North America (GANA) PCR for Flat Glass: UN CPC 3711, released 3/31/14. Life cycle stage covered: Cradle to gate. Program operator: NSF International.



- 3) A facility-specific EPD would be impractical and overly burdensome for the glass supply chain to track the source of glass because any project can be sourced from multiple glass manufacturing and fabrication locations.

- 4) The LEED program (V4.0) accepts either industry average or product specific EPDs and does not reference or require facility specific EPDs. To mandate that producer EPDs be facility specific creates a scenario where glass manufacturers are generating EPDs that satisfy the requirements of the most widely used sustainability rating system in the United States, LEED, but do not meet the requirements of the *Buy Green California Act*. This will result in additional cost for the producer and significant confusion in the marketplace.

Respectfully,

A handwritten signature in blue ink that reads "Nicole Harris". The signature is written in a cursive, flowing style.

Nicole Harris
President & CEO
National Glass Association
nharris@glass.org
703/442-4890, ext. 172