Tab 3
### Overarching Concerns

<table>
<thead>
<tr>
<th>Comment</th>
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<tbody>
<tr>
<td>Is the certification when received for a product permanent? Who is verifying the information? What happens if information proofs to be incorrect or inaccurate? Who oversees this process. To my understanding some information has to be supplied once and other in intervals. Is a well arranged overview about the intervals for every requirement planned?</td>
</tr>
<tr>
<td>The residential furniture industry and upholstery fabrics industry both have seen and will likely continue to see large increases in imported products. As a voluntary standard, it must be applied consistently and equally to all upholstery fabrics, regardless of where they were manufactured and whether they are in fabric form or already applied to furniture. Our experience has been that most U.S. manufacturers are good corporate citizens and, if a voluntary standard is approved, they will participate fairly. However, our experience with many imported products, not all but many, is that certification to compliance or anything else may or may not be accurate. It is imperative that systems be put in place to determine compliance levels of all who claim to meet the standard and that both domestically manufactured and imported fabrics be evaluated and monitored on an equal basis.</td>
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<tr>
<td>What about imported fabrics. Who would be responsible for compliance? Importer or the manufacturer? Who would certify these manufacturers?</td>
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<thead>
<tr>
<th>Proposed change</th>
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<tbody>
<tr>
<td>Work with those mills that will be affected by the standard to determine cost issues and evaluate the magnitude of these potential costs in the overall usefulness (costs vs benefits) of a published standard following the approach taken to date.</td>
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<table>
<thead>
<tr>
<th>Commenter</th>
<th>Commenting Company</th>
</tr>
</thead>
<tbody>
<tr>
<td>Christiane Fleischer</td>
<td>Rohleder</td>
</tr>
<tr>
<td>Hardy Poole</td>
<td>NTA</td>
</tr>
<tr>
<td>Salman Chaudhry</td>
<td>American Silk</td>
</tr>
<tr>
<td>Ian Patton</td>
<td>Inter-weave</td>
</tr>
<tr>
<td>John Michaels</td>
<td>Sunbury</td>
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</tbody>
</table>
## Overarching Concerns

<table>
<thead>
<tr>
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<tr>
<td>The proposed standard is so complex and convoluted that small and mid-sized mills (that is virtually all U.S. based mills serving the industry) will be severely disadvantaged so the proposal is discriminatory. The guiding principle should be simplicity.</td>
<td>Roger Berkley, Weave</td>
</tr>
<tr>
<td>The testing and record keeping requirements in the draft proposed standard discriminate against small business. We don't have the extensive technical departments and personnel of larger operators so we either have to create such departments and add personnel, or outsource those functions. Either one adds enormous cost to the product in a marketplace where customers are constantly trying to pay less.</td>
<td>Roger Berkley, Weave</td>
</tr>
<tr>
<td>Being a small manufacturer we are very concerned about the costs of meeting such a standard. To offset these costs our customers will have to pay more for our product that may significantly hurt our business or even put us out of business.</td>
<td>Salman Chaudhry, American Silk</td>
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## International Concerns

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<tr>
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<tbody>
<tr>
<td>We would like to raise the question if the overall effort to make products pass this standard is in relation to the possible benefits gained? We feel the complexity of this subject and the verifiability of the information required invites malpractice. To answer the standard in a serious manner a lot detailed and delicate information is required. European manufacturer in general have to meet very stringent environmental laws. Working and social conditions meet the highest worldwide standards. Wouldn’t our laws in general be sufficient to be certified?</td>
<td>Christiane Fleischer, Rohleder</td>
</tr>
<tr>
<td>Are there any plans to incorporate European standards in the form of awarding credits for textiles that meet existing European standards?</td>
<td>Chris Hamilton, Mokum</td>
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## General Concerns

<table>
<thead>
<tr>
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<tbody>
<tr>
<td>Applicants should not be awarded credits for reporting information already required to be reported by existing environmental laws or in their facility environmental permits.</td>
<td>Bill Stough, Sustainable Research Group</td>
</tr>
<tr>
<td>Has there been any discussion on the level of marketing that will be undertaken to ensure maximum education and information is made available to all the involved parties when the Standard is released?</td>
<td>Chris Hamilton, Mokum</td>
</tr>
<tr>
<td>Most of our suppliers are domestic and appear to be shrinking due to imports from Asia. Our company has to rely on our suppliers for most of the information needed for the standard and compliance. Their ability to provide the information and be in compliance is huge task for them.</td>
<td>Salman Chaudhry, American Silk</td>
</tr>
<tr>
<td>Overarching Concerns</td>
<td>Diana Dobin</td>
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<tr>
<td>This comment is specific to the Contract Industry and specific to the standard that could be adopted by ACT and perhaps not appropriate for other joint committee members. We recommend that all fabrics submitted for Sustainable Textile Standard review must meet all previously accepted ACT standards. Any fabrics that do not meet established ACT standards for their specific end use should not be allowed to apply for status under this standard as they break the major sustainability concept of projected performance and appropriate life/use expectancy.</td>
<td>Add a section for transportation in the draft standard.</td>
</tr>
<tr>
<td>Transportation is an important part of our manufacturing process. Certain products that are recycled may use energy at the same time may cause a huge carbon footprint due to transportation it requires.</td>
<td></td>
</tr>
<tr>
<td>Well done. Overall, the standard is comprehensive. It is by no means a perfect standard but it is the best internationally in terms of driving the textile industry to better environmental practices. Other textile standards such as the EU Flower and Oeko Tex reward a ‘business as usual’ approach.</td>
<td></td>
</tr>
<tr>
<td>Who will be the official interpreter of the Standard?</td>
<td>John Michaels</td>
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**Addressing of previous concerns**

<table>
<thead>
<tr>
<th>Addressing of previous concerns</th>
<th>Hank Truslow</th>
<th>Sunbury</th>
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</thead>
<tbody>
<tr>
<td>I am wholly unsatisfied that the various committees have addressed many stakeholder concerns that have been openly communicated in public meetings and little to no changes have been made to the Draft standard addressing those concerns.</td>
<td>Address the stakeholder concerns in an open and transparent process and make substantive changes to the Draft standard to allow for these issues. It is quite obvious that this has not been the case to date and I cannot support a process does not follow the course of development that was initially laid out.</td>
<td></td>
</tr>
<tr>
<td>Most issues from the last year meetings were to be addressed for the next draft/ballot. They seem to be ignored.</td>
<td></td>
<td>Salman Chaudhry</td>
</tr>
<tr>
<td>We all agree there will be some sort of standard. However, there were many concerns voiced with the content as well as the overall timing and implementation of the specification. This new draft does not recognize many of these comments or concerns.</td>
<td>Review, recognize, and revise the standard to take into considerations these comments and concerns that were voiced in previous meetings and discussions. Define a timeline for implementation that is agreed upon and developed by industry membership.</td>
<td>Jim O'Brien</td>
</tr>
</tbody>
</table>
While developing a draft document like this one is not easy, the difficulty is magnified when virtually all discussions are via telephone conferences. In fact, I believe there has been only one face-to-face meeting of the Joint Committee and that was almost one year ago. While I have not been able to participate in the many conference calls taken place over the duration of developing this standard, several who have been regular participants have expressed surprise that the new drafts based on conference call discussions did not seem to reflect the outcome and final agreements reached during the calls. This has created setbacks to the process and confusion among some Joint Committee members that tends to lengthen the process and create questions about forward progress.

<table>
<thead>
<tr>
<th>Hardy Poole</th>
<th>NTA</th>
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Straw Poll for Scoring

The Joint Committee (JC) for the sustainable textile standard will meet in the Spring of 2008. The JC would like your input on various scoring aspects of the standard. Please make your voice heard by completing this brief questionnaire. Thanks in advance.

Your Name: ____________________________________________
Your Company: __________________________________________

Identify your preference by placing an X beside it:

1) How many **levels of certification** should the standard have?
   a) 1 level: Certified
   b) 3 levels: Silver, Gold, Platinum (e.g. good, better, best)
   c) 4 levels: Certified, Silver, Gold, Platinum
   d) No preference
   e) Other (describe): ______________________________________

Background:
The LEED-CI rating system has 4 levels (named as above). The level of points required to achieve a level will be set by the JC, which will account for feedback from the pilot program.

2) If you selected b) or c) in Q1:
   a) the lowest level should equate to meeting pre-requisite criteria.
   b) the lowest level should exceed pre-requisite criteria.
   c) No preference
   d) Other (describe): ______________________________________

Background:
The standard includes pre-requisite and optional points. The number of pre-requisite versus optional points varies with each sustainability parameter / category. The decision to make a criteria a pre-requisite or optional has been made by the task groups assigned to writing sections of the standard (i.e. Fiber Sourcing Task Group, Social Accountability Task Group, etc.).
3) Which distribution best reflects the relative importance of the sustainability parameters?

a) “Current” pie chart: 6% Fiber, 38% Safety of Matl, 14% Water, 16% Energy, 9% Recycling, 17% Social

b) “Possible” pie chart with 50% of points awarded to How the fabric is made and 50% to What the fabric is made of: 20% Fiber, 30% Safety of Matl, 13% Water, 13% Energy, 13% Recycling, 12% Social, 1% Air

c) Equal weighting of sustainability parameters

d) No preference

e) Other (describe): ____________________________________________

Pie charts from Q3:
4) Select your preference for a **points scale**.

a) 100-pt scale: The maximum number of points available should equal 100. The maximum points available for each sustainability parameter is weighted according to its relative importance (as defined in Q3).

b) No scale: The maximum number of points should not be limited to 100. There is no weighting.

Background: LEED-CI currently does not use a 100-pt. scale. The advantage of the 100-pt scale is you don’t have to know the maximum number of points available in order to know if a score is low or high.

5) Select your preference for **reporting points**.

a) Only report the total point value (e.g. Total Score = 53 of 100 pts).

b) Report the total score and/or the points for each sustainability parameter (e.g. Total Score = 53 pts; Fiber = 10 pts of 20 available, Safety of Matl = 20 pts of 50 available, etc.).

c) Report the total score and/or %age of points awarded within each sustainability parameter (e.g. Total Score = 53 pts; Fiber = 50%; Safety of Matl = 40%, etc.). If a 100-pt scale is used then the # points = %.

d) No preference

e) Other (describe):

6) Select your preference(s) for **visually communicating product certification**. Select one from each grouping.

a) Certified products should use an ACT certification logo (not designed yet; would be small enough to be included on fabric sample or card)

   OR

b) Certified products should **not** use an ACT certification logo

*If you selected a)*:

c) ACT logo should **exclude** certification level

   OR
d) ACT logo should include certification level

e) ACT logo should exclude 1\textsuperscript{st}, 2\textsuperscript{nd}, or 3\textsuperscript{rd} party certification

f) ACT logo should include 1\textsuperscript{st}, 2\textsuperscript{nd}, or 3\textsuperscript{rd} party certification

Background: Additionally, each certifier may have its own certification logo.

7) Select your preference(s) for visually communicating details about product certification. Select one from each grouping.

a) Bar Chart A – chart with one bar for each sustainability parameter where length of bar indicates relative importance of parameter. Both optional and pre-requisite points can be shown.

b) Bar Chart B – chart with one bar for each sustainability parameter where all bars have the same length. Shaded area of bar indicates the %age of points awarded. This format would only apply if all parameters have equal importance.

c) Spider / Radar Chart – chart with sustainability parameters radially branching out from the center. In the center is a graphic representation where more area is colored when more points are awarded. For each parameter, the distance from the center reflects the percentage of points awarded. Because the radial distance is the same for each parameter, this format would only apply if all parameters have equal importance.

d) Other (describe):

e) There should be an ACT icon for each sustainability parameter

f) There should not be an ACT icon for each parameter
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Q1: Preference for # of certification levels

- 1 Level: 40%
- 3 Levels: 18%
- 4 Levels: 36%
- 5 Levels: 0%
- No preference: 4%
- Other: 2%

Q2: If 3 or 4 levels, then lowest level should:

- Meet Prerequisites: 72%
- Exceed Prerequisites: 23%
- No preference: 5%
Q3: Relative importance of sustainability parameters

- Current 50% (50 How / 50 What 7%)
- Equal 2%
- No preference 0%
- Other 17%

Q4: Preferred point scale

- 100-pt scale 74%
- No limit on points 26%
Summary of Results from 2008 Scoring Survey

Q5: Preference for reporting points

- Report total only: 7%
- Report total &/or by parameter: 36%
- Don't report points. Only report level: 37%
- No preference: 5%
- Other: 15%

Q6: Is the use of a logo preferred?

- Yes: 100%
- No: 0%
Q6: Include or exclude level of certification with logo?

- Include: 54%
- Exclude: 46%

Q6: Include or exclude 1st, 2nd, or 3rd party certification with logo?

- Include: 30%
- Exclude: 70%
Q6: Include or exclude total score with logo?

- Include: 22%
- Exclude: 78%

Q7: Preferred method for communicating details

- Bars of variable length: 46%
- Bars of equal length: 23%
- Spider / Radar: 11%
- Other: 20%
Q7: Use an icon for each parameter?

- Yes: 28%
- No: 72%