

Joint Committee Issue Document

NOTE: An issue document may be submitted at any time – it comprises two parts: the cover sheet (this page) and a description of the issue to be submitted to the Joint Committee (following page). A separate issue form is required for each issue submitted. Issue papers include proposals for modification of a standard, information reports and (of current research, etc.). An issue paper shall be categorized as being for ACTION or for INFORMATION. Submitters should limit the Issue Paper to 1 or 2 pages – attachments detailing full recommendations or background information may be attached with supplementary information. The Chairperson of the appropriate Joint Committee will respond within 30 days of receipt of the issue document advising what steps will be taken. Any issue document intended for discussion at a Joint Committee meeting must be received at least 21 days prior to the meeting to ensure inclusion in the agenda.

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Signature of Submitter * Robert Komrij Date 9/03/09

*Type written name will suffice as signature

Please insert a check (X) in the appropriate place to indicate if you wish the item to be considered as an action item or as an information item.

Action Information

NSF Standard(s) Impacted: NSF ANSI/140 Sustainable Carpet Assessment

Issue Statement:

Provide a concise statement of the issue, which reference as appropriate any specific section(s) of the standard(s) that are related to the issue.

Throughout the NSF 140-2007 document the term “Green-e” is used. In the definition section the term “Green-e” is clarified by stating:

(In Section 3.14 Definitions)

“Whenever the term “Green-e” appears in this Standard, it means “Green-e or equivalent”. “Equivalent” means nonnuclear, non-fossil based fuels”

(Also in Section 7.1 Scope)

“For the purposes of this Standard, renewable energy is defined in 3.14.

“NOTE – As used in this Standard, the term “Green-e” refers to Green-e or equivalent forms of fuel, such as nonnuclear, non-fossil based fuels.”

This definition needs further clarification. Some individuals are interpreting this definition to mean “must meet Green-e requirements” others are interpreting it to mean “non-nuclear and non-fossil based fuels”.

Background:

Provide a brief background statement indicating the cause and nature of concern, the impacts identified relevant to public health, public understanding, etc, and any other reason why the issue should be considered by the Committee.

This new definition has significant impact to NSF-140 submittals. It affects many sections and many supplier inputs.

If the intent is to encourage the use of non-nuclear and non fossil fuel based (renewable) energy sources then it needs to be clearer. Proving what percentage of your energy provider output meets Green-e requirements is very difficult. Power providers or suppliers will not provide statements that say whether or not, and what part of their energy content, meets "Green-e" requirements.

To encourage the use and ability to earn credit for renewable energy this definition should be very clear for the reader to understand. Forcing an energy provider or suppliers to document whether the source meets the requirements of Green-e is an unfair burden on companies trying to get NSF certified.

Clarifying the "nonnuclear and non-fossil fuel" statement is essential to future NSF 140 credibility.

Removing this ambiguity should allow the submitter to better control his destiny and encourage the increased usage of any renewable energy credit sections.

Recommendation:

If action by the Joint Committee is being requested, clearly state what action is needed: e.g., recommended changes to the standard(s) including the current text of the relevant section(s) indicating deletions by use of ~~strike-out~~ and additions by highlighting or underlining; e.g., reference of the issue to a Task Force for detailed consideration; etc. If recommended text changes are more than a half page, please attach a separate document.

Currently 3.14 reads as follows:

3.14 renewable energy: Includes solar electric (photovoltaic), solar thermal, wind, geothermal, biogas, biomass, hydro and renewable cogeneration on site or off site, on or off grid. Off-site renewable energy can be displaced with renewable energy meeting Green-e requirements or equivalent. Whenever the term "Green-e" appears in this Standard, it means "Green-e or equivalent". "Equivalent" means nonnuclear, non-fossil based fuels.

Proposed 3.14 to read as follows:

I would like to expand the sentence to include something like this: "Equivalent" means nonnuclear, non-fossil based fuels, it is not mandatory to meet Green-e requirements. The source needs to meet only the nonnuclear or non-fossil based fuels requirement.

This change would make the definition clearer and eliminate some of the confusion that currently exists. It would also encourage the increased usage of the renewable energy credit sections

Supplementary Materials (photographs, diagrams, reports, etc.):

If not provided electronically, the submitter will be responsible to have sufficient copies to distribute to committee members.

Submitter Robert Komrij

Date 9/3/09