



August 2, 2004

To: All Interested Parties

Re: State of California Division of the State Architect EPP Database Project

#### MEETING SUMMARY

There was an Industry Roundtable Meeting, July 27, 2004, from 9am-12pm at DGS Headquarters, West Sacramento, CA.

The purpose of the meeting was to receive feedback on how the process being used to develop criteria for the EPP Database was and was not working from an industry and general stakeholder perspective. The meeting was open to the public and attended by approximately 70 people in person and 10 people via teleconference. An attendee list was emailed to all participants who sent an RSVP and or signed in at the meeting. The following is a summary of what we heard expressed during the meeting:

1. Overall lack of industry input - manufacturers and trade associations were either given too little notice of the release of draft specifications or not contacted at all by the project team
2. Going beyond statutory authority - lack authority to ask for proprietary information; lack authority to be technology-pushing; lack authority to ask for data that is not required by relevant government regulatory authority (i.e., OSHA compliance)
3. Voluntary standards will be effectively mandatory
4. Concern over the members of the Working Group - consists of public agency representatives, non-profit organizations, and one private corporation, but no manufacturer involvement; consider creating an Industry Working Group or individual Advisory Groups for each product category;
5. Concern over difference between "open" and "interactive" process - not truly open unless it's interactive
6. Composite Panels and Gypsum representatives report that no products currently meet draft specifications
7. Adding cost to business - cost of documenting conformance with specifications is too high and will adversely impact small businesses; will drive business out of California
8. Definitions of "EPP" differ between AB373 and AB498
9. Process creates impression that industry has no meaningful input - lack of involvement prior to drafting of specification; insufficient time to respond; industry treated as "annoyance"; feeling that train is moving ahead regardless of input
10. Does not compare products of like usage, as stated in statute - authority to create a list of products does not include authority to create criteria
11. Creation of this database is a great step towards reducing the confusion and conflicting requirements placed on products issued by various state and local programs
12. When existing EPP standards exist (such as Composite Panel Association), they should be used

13. Concern that a contractor on this project has an axe to grind through history of involvement with industry
14. Specifications restrict interstate commerce
15. Caution in using NREL High Performance Buildings Database, which may not be funded into the future
16. Caution using BEES data - it is being overhauled in the next year; products in BEES are already better than industry average
17. Simplify and clarify definition of LCA Practitioner used in specifications
18. Recommend establishing an Advisory Panel focused on reviewing LCA criteria
19. Use California ARB contacts list and Lobbyist book to improve outreach efforts
20. Web pages and email do not provide adequate opportunity for interaction and dialogue
21. Asking for comments on a draft specification is not indicative of a partnership - require involvement prior to the drafting of the first specification
22. Ranking vs. Pass-Fail - question of whether statute requires ranking
23. Concern regarding adherence to Administrative Procedures Act (APA) - both a question of how process will comply and if there is an opportunity to proceed without using APA
24. Allow for public comment on website at all times, outside of formal public comment period for each specification
25. Industry requests 60-90 days notice for each new product category
26. How will EPP listings be coordinated with (CHPS) listings?

Panama Bartholomy  
High Performance Buildings  
Division of the State Architect  
1102 Q St., Suite 5100  
Sacramento, CA, 95814  
(916) 445-4229  
panama.bartholomy@dgs.ca.gov