



Commodity Futures Trading Commission

2017 Strategic Sustainability Performance Plan

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POC: Margie Yates

202-418-5671

myates@cftc.gov

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Policy Statement

The Commodity Futures Trading Commission (“CFTC” or “Agency”) continues to endorse sustainability as delineated in Executive Order (E.O.) 13693, entitled, *Planning for Federal Sustainability in the Next Decade*. CFTC’s interest in the environment and promoting sustainable results are integral to its professional conducts and the management of the Agency.

CFTC pledges to conduct its responsibility and sustainability efforts with transparency and openness and will continue its efforts to operate upon the following principles:

- To comply with and where practicable, all applicable legislation, regulations and codes of practice
- To integrate sustainable matters into our business decisions where applicable and feasible
- To minimize the impact of sustainability in all office and transportation activities
- To review, annually report, and continue to strive and improve our sustainability performance
- Make decisions based on the best information, resources and financial ability available to us

The CFTC leases commercial office space and will encourage practical sustainable requirements into its lease agreements by working with the building owners. The Agency will also make reasonable efforts to educate its employees by promoting energy efficient practices and to improve upon current programs already in place.

The CFTC remains committed to advocate and improve its sustainability and environmental responsibility by our staff and broader stakeholders.

CANDACE A. TURNER, Chief
Logistics and Operations
Chief Sustainability Officer



CFTC 2017 STRATEGIC SUSTAINABILITY PERFORMANCE PLAN

Executive Summary

The Commodity Futures Trading Commission (“CFTC” or the “Agency”) is an independent, small agency formed in 1974, which regulates futures and option markets. The mission of the CFTC is to foster open, transparent, competitive and financially sound markets, to avoid systemic risk, and to protect the market users and their funds, consumers, and the public from fraud, manipulation, and abusive practices related to derivatives and other products that are subject to the Commodity Exchange Act. All four of CFTC’s locations, Washington, DC (headquarters); New York, NY; Chicago, IL and Kansas City, MO, are leased through commercial real estate companies. Overall CFTC leases 434,679 sq. feet. As tenants, our ability to entirely control our sustainable efforts are limited, however, CFTC identifies and understands sustainability related issues that are most critical to the ongoing success and viability of its program.

The Agency’s headquarters continues to effectively partner with the landlord and property management company by adopting sustainable practices, by aligning with and capitalizing on operational efficiencies, benchmarking and assessing performances with respect to the laws, codes, performance standards and voluntary initiatives.

The landlord, Beacon Capital Partners LLC (“Beacon”) is a private real estate investment firm that develops, owns, and operates more than 24 million square feet of commercial office properties in cities in the United States and Europe. Beacon is receiving ENERGY STAR® Partner of the Year—Sustained Excellence recognition for leveraging competitions and awareness campaigns to engage stakeholders, and for its continued implementation of a wide range of energy efficiency measures throughout its portfolio. The 2017 ENERGY STAR Award winners lead their industries in the production and sale of energy-efficient products and services, and in the development and adoption of strategies that provide substantial energy and money savings in the buildings where we live and work. The winners are selected from a network of 16,000 ENERGY STAR partners. ENERGY STAR partners are leading the way, contributing to the prevention of 2.8 billion metric tons of GHG emissions through energy efficiency. Beacon’s top key accomplishments include:

- Earning a 1 – 100 ENERGY STAR score of 75 or higher for more than 90 percent of its properties, with an average portfolio score of 85.8.
- Expanding Beacon’s internal recognition, the Blue Star Award, to Beacon’s entire office building portfolio, where building maintenance and management team members compete for the best energy-saving initiative on a national level.
- The Beacon Tenant Energy Awareness Concierge Program, which conducts individual meetings with new and existing management explaining the ENERGY STAR Program, the building’s ENERGY STAR benchmark scores and trends, Beacon’s energy programs, and offers a list of

potential energy savings opportunities. The program is on its way to being used with the majority of Beacon's larger tenants, representing more than 15 million square feet.

- Developing the Beacon Tenant Welcome Package, which is sent to new tenants shortly after Beacon purchases a property, introduces Beacon's focus on ENERGY STAR, sustainability, and planned energy and sustainability improvements to the property.
- Continuing the "No Cost Energy Savings Program" has saved nearly one million kilowatt hours (kWh) per year per, property since 2010.
- Forming Tenant Green Teams at several properties, which focus on education and behavioral changes among tenants.
- Participating in the ENERGY STAR National Building Competition: BOOTCAMP

Beacon also installed beehives at 19 of its properties which promote pollination. The Agency's headquarters has 6 beehives on top of its building complex. Pollinators transfer pollen and seeds from one flower to another, fertilizing the plant so it can grow and produce food. Cross-pollination helps at least 30 percent of the world's crops and 90 percent of our wild plants to thrive. Without **bees** to spread seeds, many plants—including food crops—would die off. In addition, Beacon implemented an e-waste project where recycling bins specific for personal electronics, batteries, computers, etc., can be disposed.

These are very significant achievements by our landlord of which the CFTC supports and contributed towards making this recognition possible.

CFTC also has programs that provide sustainable results. To name a few:

Travel/Transportation Programs:

In order to fulfill much of the CFTC's mission and goals, business travel between office locations, domestic and international is required. CFTC does consider its travel arrangements to ensure the most fuel-efficient, low-emission and economical transportation is being used before committing to a travel method.

CFTC avoids physically travelling to meetings, etc. where alternatives are available and practical, such as video teleconferencing, webcasting, and WebEx, for internal and external participation. These options are often more time efficient while not sacrificing the benefits of regular contact and allows participants of the meeting to curtail costs associated with travel, reduces energy usage, permitting greater efficiencies overall. When travel is necessary, the agency combines as many meetings, activities, and appointments into one trip as possible.

Another sustainable endeavor is the transit program under the guidance of Executive Order 13150 that encourages use of public transportation. Currently, **80%** of the eligible workforce in Washington, DC; New York, NY; and Chicago, IL offices participate in the program.

CFTC headquarters has accommodated employees who bike to work by providing 16 bike lockers and secured storage space for 20 bikers. In addition our landlord provides bike space and racks that accommodate another 95 bikers. Our Chicago, IL and New York, NY offices also have accommodations for bikers. As this greatly reduces energy consumption, production of air pollutants and the impact on CO2 global warming, this is an area where CFTC continues to see more participation and a greater contribution from its employees towards cleaner air.

Teleworking and Alternative Work Schedules:

As mentioned in prior sustainable reports, the Agency offers teleworking and alternative work schedules which also contributes to the reduction of energy consumption, GHG, and improves air quality. Of CFTC's eligible workforce, **86%** participate in the telework program and **72%** of CFTC's workforce has alternative work schedules.

Facilities:

CFTC's is committed to minimizing its impact on landfills by reducing, reusing, and recycling. CFTC in conjunction with its landlord participates in the recycling program that is in place in the three-building complex where headquarters reside. While there is always room for improvement, the property management company reports that the property continues to recycle **60%** of its waste. CFTC continues to work with the property management company to improve its waste reduction. CFTC through its own shredding company, Shred-it, also recycles its confidential and sensitive material separately from the building management's program. A recent report from the shredding vendor indicates that in the past 6 months, we have saved **117** trees by recycling shredded paper. CFTC also advocates minimizing the use of paper and other office consumables by double-sided printing, option to eliminate header pages, re-use of folders and notebooks, and will continue to identify other opportunities to reduce waste.

Electronic Stewardship:

CFTC's Office of Data and Technology ("ODT"), has exceptional control over its complex mixed IT environments. The control requires visibility into the power, space and cooling of the data center, which enables ODT to more effectively manage capacity, mitigate risks and improve overall efficiency.

CFTC equipment addressed by the Electronic Product Environmental Assessment Tool (EPEAT) meets more than **95%** of EPEAT requirements. Equipment includes workstations, displays, and laptops. In order to support the Agency's telework and alternative work schedules, the computers are set to automatically balance performance with energy consumption and monitors are configured to turn off after 20 minutes of inactivity.

CFTC does not currently have policies that specifically address extending the useful life of electronic equipment; however, it is surplus and disposed of through GSA, which may extend the useful life through its programs. CFTC replaced **90%** of its network storage equipment and **10%** of its servers with higher energy efficient equipment in 2016. This past year CFTC replaced **30%** of its network communication equipment and **50%** of its servers with higher energy efficient equipment. CFTC also reduces costs by trading in the equipment which was environmentally friendly as the vendor recycles and reuses the electronic components instead of going to a landfill.

CFTC complies with the following requirements of the Federal Electronics Challenge:

- Find energy efficient electronic equipment.
- Require energy efficient electronic equipment in acquisition and procurement documents.
- Develop or update purchasing policies, procedures and guidance, to require acquisition of energy efficient electronic equipment.
- Gather information about electronic equipment that must be power managed (computer desktops, notebooks/laptops and monitors).
- Investigate implementation options for local and/or network power management.

- Activate power management (printers and copiers).
- Enable duplexing (double-sided) features on imaging equipment and connected computers.
- Streamline acquisition and use of imaging equipment.
- Reduce resource use by imaging equipment.
- Extend the life of existing electronic equipment.
- Evaluate requests for new electronic equipment purchases.
- Evaluate remote desktop solutions (e.g., thin client) to reduce hardware and software distribution to individual users.
- Educate employees on how to improve operation and maintenance of electronic equipment.

CFTC does not comply with the following requirements of the Federal Electronics Challenge due to a lack of resources and tools to effectively track the following requirements:

- Record or track annual purchases and leases of energy efficient electronic equipment for necessary reporting.
- Track and maintain power management settings.
- Develop or update IT operation and maintenance policies, procedures and guidance, to ensure continued power management.
- Track power management compliance for necessary reporting.

Based on CFTC's mission need to support telework, alternative work schedules and effective mobile computing, the CFTC does not comply with the following requirements below:

- Turn off/power down electronic equipment at the end of each work day and/or over weekends and holidays.
 - However, CFTC has configured power saving settings for the monitors, network/personal printers, and CPUs to throttle down and limit the use of electricity. All workstations are set to automatically balance performance with energy consumption on capable hardware.
- Limit the number of computers per user to one (either desktop or portable) (based on mission need to support telework, effective mobile computing, and improve security by favoring the use of CFTC-controlled rather than personal devices).
 - Except for specially designated teams, CFTC onsite users are assigned to utilize one dedicated computer system.
 - Some users are assigned a GFE laptop for offsite use to access CFTC resources via VPN/RDP back to their desktop.
 - CFTC is launching an effort in 2018 to replace desktops with laptops as staff's primary workstation limiting the number of computers to one per user.