



**U.S. Commodity Futures Trading Commission**

# **2016 Strategic Sustainability Performance Plan**

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## U.S. COMMODITY FUTURES TRADING COMMISSION

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### Logistics & Operations Section

September 27, 2016

### *Policy Statement*

The Commodity Futures Trading Commission (“CFTC” or “Agency”) is committed to promoting sustainability. As outlined in Executive Order (E.O.) 13693 entitled, *Planning for Federal Sustainability in the Next Decade*, which was signed by the President on March 19, 2015. Concern for the environment and promoting a broader sustainability agenda are integral to the CFTC’s professional conduct and the management of the Agency.

The CFTC intends to 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 sustainability considerations into all business decisions where applicable and feasible
- To minimize the impact on sustainability of all office and transportation activities
- To review, annually report and continually strive to improve our sustainability performance

The CFTC leases its office space from private entities and will continue to build 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. The CFTC has achieved both Silver and Gold certification levels in the U.S. Green Building Council’s (USGBC) Leadership in Energy and Environmental Design (LEED) for Existing Building Operations and Maintenance (EBOM) Program and has also attained LEED for Commercial Interiors (CI) certification.

The CFTC is committed to continual improvement as an Agency by establishing, promoting, maintaining and improving a culture of sustainability and environmental responsibility by our staff and broader stakeholders.

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



## CFTC 2016 STRATEGIC SUSTAINABILITY PERFORMANCE PLAN

### Executive Summary

The Commodity Futures Trading Commission (the “CFTC” or the “Agency”) is an independent, small agency formed in 1974, which oversees our nation’s futures, options, and swaps 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 the CFTC’s locations, Washington, DC (headquarters); New York, NY; Chicago, IL and Kansas City, MO, are leased through commercial real estate companies. Overall the CFTC leases 434,679 sq. ft., of which **66%** is LEED Certified, an increase of 36% from 2015. As tenants, our ability to entirely control our sustainable efforts are limited, however, the CFTC identifies and understands sustainability related issues that are most critical to the ongoing success and viability of its program. \*

The Agency continues to effectively partner with its property management companies by adopting sustainable practices, aligning with and capitalizing on operational efficiencies, benchmarking, and assessing performance with respect to the laws, codes, performance standards and voluntary initiatives.

For instance, the U.S. Environmental Protection Agency (“EPA”) has named the CFTC’s headquarters property management firm, Beacon Capital Partners, ENERGY STAR 2016 Partner of the Year for Sustained Excellence. This is the 5<sup>th</sup> consecutive year Beacon has received the Partner of the Year Award, and this 2016 award acknowledges their leadership in adopting a continuous energy management strategy. This award provided for the many energy conservation and sustainability programs that have been implemented at the Agency’s headquarters location, recognizes the LEED Gold certification, participation in the energy load reduction program, lights off efforts after-hours and energy efficient tenant renovations.

In addition, the CFTC’s landlord, BBH, in its New York location has also achieved LEED GOLD status in the building and the Chicago location’s landlord, Tishman, has achieved LEED GOLD and Energy Star certifications.

Each year, the EPA honors a select group of organizations from its 16,000+ partners, which have made outstanding contributions to protect the environment through superior energy efficiency achievements. In 2014 alone, all ENERGY STAR partners prevented 283 million metric tons of greenhouse gas (“GHG”) emissions, providing \$31.5 billion in economic benefits.

*\*As stated in our GHG report dated 1/29/16, the CFTC is exempt from Scopes 1 and 2 and are limited to two major categories in Scope 3 – Facilities and Travel. Because we lease commercial space with limited ability to control GHG emissions, we do consider our environmental impact of our lease and operational decisions. It is unclear how the CFTC can set greenhouse gas emissions in absolute terms by the end of fiscal year 2025 with the baseline from 2008. We do report annually on our progress based on the management of the commercial building that we independently lease and is not through GSA.*

This is a very significant achievement by our property management companies. The CFTC supports these efforts and contributed towards making this recognition possible.

The 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. The CFTC does consider its travel arrangements to ensure the most efficient source is being used before committing to a travel method. The CFTC avoids physically travelling to meetings, etc. where alternatives are available and practical, such as using teleconference, webcasting, WebEx, and video conferencing for internal and external participation. These options are also 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 and permits greater efficiencies overall. When travel is necessary, the agency combines as many meetings, activities, and appointments into one trip, as it is able.

Another part of the CFTC's sustainable efforts involves its transit subsidy program which encourages use of public transportation under the guidance of Executive Order 13150. Currently, the Washington, DC, New York, NY and Chicago, IL offices take part in the transit program with **82%** of the eligible workforce participating, an increase of 2% from 2015.

In addition, the CFTC headquarters accommodates employees who bike to work by providing 16 bike lockers and secured locked space for 20 bikers. In addition our landlord provides bike racks that accommodate another 95 bikers. Our Chicago, IL and New York, NY offices also have accommodations for bikers such as bike racks and secured bike cages and have seen increased participation. The New York and Kansas City Offices have racks and secured bike parking as well. It is a proven fact that if you ride your bike to work instead of traveling by car just one day a week, it reduces the contribution to CO<sub>2</sub> global warming by 20% annually. It also reduces the nation's dependence on fossil fuels, and reduces landfill waste. It improves air quality and protects the wildlife. As this greatly reduces energy consumption and production of air pollutants and reduces the impact on CO<sub>2</sub> global warming, this is an area where the CFTC would like to see more growth and will do so by offering more incentives. Over the past several years the CFTC has participated in the Federal Bike to Work week, which not only was supported by the regular bikers that bike to work, but also other employees who do not bike regularly. This incentive provides a friendly competition with other Federal agencies and encourages more employees to bike to work instead of using cars. The CFTC's Chicago landlord, Tishman, also has an electric car-sharing program in place and provides a vehicle charger.

Several years ago, the CFTC eliminated its fleet management program and has continued that policy and therefore is not contributing to petroleum usage or greenhouse gas emissions in this area.

## Teleworking and Alternate Work Schedules:

As mentioned in prior sustainability reports, the Agency offers teleworking and alternative work schedules which reduce energy use and GHG emissions, and improve air quality. **78%** of the CFTC's eligible workforce participates in the telework program (a decrease of 4% from 2015) and **55%** of the CFTC's workforce uses alternative work schedules (an increase of 21% from 2015).

## Facilities:

The CFTC is committed to minimizing its impact on landfills by reducing, reusing, and recycling. The CFTC, in partnership with its landlord, participates in the recycling program that is in place in the three-building complex where its headquarters resides. While there is always room for improvement, the property management firm reports that the property continues to recycle **60%** of its waste. The CFTC continues to work with the property management company to improve its waste reduction. The CFTC over the past year has made its employees more aware of what can be recycled by placing posters in strategic areas around the office and placed extra recycling bins around the agency for its spring cleaning program. The spring cleaning program designates a certain time period for the divisions in all of its locations to destroy old files by using the additional recycle bins or the secured shred bins for confidential material. This program has been successful over the years as it brings a focus to recycling. The CFTC also encourages minimizing the use of paper and other office consumables, for example by double-sided copy and print jobs, identifying opportunities to reduce waste and emphasizing the "3 R's"; Reduce, Reuse, Recycle.

## Electronic Stewardship:

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

The CFTC equipment addressed by the Electronic Product Environmental Assessment Tool ("EPEAT") meets more than **95%** of EPEAT requirements. Equipment includes workstations, displays, and notebooks. In order to support telework, alternative work schedules, and security patching, the computers are configured for performance rather than power savings. However, the CFTC has set power saving settings for monitors, network/personal printers and CPUs to throttle down and limit the use of electricity.

The CFTC does not currently have policies that address extending the useful life of electronic equipment; however, we work with GSA to dispose of it. This past year, the CFTC replaced **90%** of its network storage equipment (compared to 20% in 2015) and **10%** of its servers (compared to 40% in 2015) with more energy efficient equipment. The CFTC reduced costs by trading in the equipment rather than sending it to a landfill, an environmentally-friendly option since the vendor recycles and reuses electronic components.

The 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.
- 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 the CFTC-controlled rather than personal devices).

The CFTC does not comply with the following requirements of the Federal Electronics Challenge due to 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 mission need to support telework, alternative work schedules, and effective mobile computing, the CFTC does not comply with the requirement below:

- Turn off/power down electronic equipment at the end of each work day and/or over weekends and holidays. However, as mentioned above the CFTC does have power saving settings for the monitors, network/personal printers and CPUs to control and limit the use of electricity.