



U.S. Forest Products Industry Concerns with Legislation Referencing Only the LEED Rating System

The advancement of high-performance, or “green,” buildings at the federal level is a laudable goal. However, the specific inclusion of language containing reference to only the Leadership in Energy and Environmental Design (LEED)[™] Green Building rating system designed by the U.S. Green Building Council (USGBC) is of concern to the U.S. forest products industry. The LEED system discriminates against environmentally superior U.S.-produced wood products, is not based on life cycle assessment (LCA), and was not developed by a consensus process.

- **LEED prohibits the two largest sustainable forestry programs in the U.S. from gaining credit:** The LEED rating system provides a specific credit only for forest products that have been certified by the Forest Stewardship Council (FSC). The FSC standard was initially developed by international environmental groups to combat tropical deforestation. It is predominately recognized in Europe. But LEED provides no credits for wood products produced by companies independently third-party certified to the Sustainable Forestry Initiative® (SFI) Program standard or the American Tree Farm System® (ATFS) – the two largest sustainable forest management systems in the U.S. Only 22 million acres are FSC-certified in the United States, while SFI and ATFS, account for over 83 million acres.
- **The LEED rating system does not recognize the positive attributes of renewable wood products:** Through several of its specific credits, wood products are put at a significant disadvantage to competing (and environmentally inferior) building materials. Wood products are among the most environmentally benign of all building materials. Wood is a renewable resource that sequesters huge amounts of carbon and naturally provides high levels of energy efficiency. Furthermore, wood products are a vital component of sound architectural design and facilitate ease of quality design and construction.
- **The USGBC has not developed LEED in a consensus process open to all interested parties:** The process used by USGBC to create and maintain LEED does not meet generally accepted criteria for the development of a consensus standard. The USGBC fails to meet most of the measures of a successful standards development process as set out by the American National Standards Institute (ANSI). A consensus process is one that is open to all interested parties, not just to selected categories or organizations. It also provides transparency, ensures meaningful opportunities for participation by groups that will be affected by the standard, and has procedures to ensure balance, consideration of dissenting views, and appeals procedures. The LEED system does not meet these requirements.
- **Legislation should not pick winners and losers in the constantly-evolving green building marketplace.** There are several alternative building rating systems existing in the green building marketplace. Solely including references to the LEED rating system prevents other credible systems from contributing to legislative goals. For example, the Green Building Initiative’s Green Globes rating system was recently imported to the U.S. market from Canada, where it is utilized by the Canadian government. Green Globes is included in several pieces of state green building legislation and is being adopted by private sector companies intent on constructing high-performance buildings.

Conclusion

The forest products industry supports the construction of environmentally-friendly and energy efficient “green” buildings. However, there are several flaws inherent in the LEED rating system that prevent it from achieving these goals. Primary among these shortcomings are LEED’s exclusion of environmentally friendly, and readily available, wood building products. By only specifically including the LEED rating system in its language, such legislation unfairly prevents other credible green building rating systems from assisting the federal government from meeting its goals. Congress should pass legislation that ensures all alternative rating systems are made eligible to participate in the bill’s objectives.

Last Updated: 1/21/08