
**Comments of the Flexible Vinyl Alliance**
**To the: General Services Administration (GSA)**
**Ref: Notice-MG-2012-04**
**April 8, 2013**

These comments are submitted on behalf of the members of the Flexible Vinyl Alliance (FVA), and address the approaches GSA *may* recommend to the Department of Energy on the certification of green Federal buildings. We thank you for this opportunity.

As background, the Flexible Vinyl Alliance is an industry coalition representing the full value chain of flexible vinyl product concerns, inclusive of resin manufacturers, plasticizer producers, compounders, processors, and converters. Our members represent companies which design, engineer, and produce flexible vinyl products for building, medical, defense, automotive, flooring, roofing, and packaging applications.

As such, FVA represents a $20B U.S. industrial production base representing more than 275,000 US manufacturing-related jobs in 47 states.

Flexible PVC offers a value-laden and beneficial range of applications, including cost-effective, durable, and sustainable building products, such as resilient flooring, roofing, wall coverings, wire and cable, and soft goods. Life cycle analysis of flexible vinyl building products have found that vinyl offers cost, performance, and environmental benefits equal to or better than other materials in many applications.

We fully support GSA's efforts to improve the efficiency and sustainability of federal buildings and the role of green building certification systems in this process. Seeking public input regarding possible approaches GSA *may* take in fulfilling its requirement from the Energy Independence and Security Act (EISA) of 2007 --- to ultimately provide a formal recommendation to the Secretary of Energy that identifies a green building certification system(s) most likely to encourage a comprehensive and environmentally-sound approach to the certification of green Federal buildings, is laudable.

***To this end, the FVA strongly supports and encourages the use of objective, life-cycle analysis (LCA), and ANSI accredited (consensus-based) green building certification systems to achieve GSA and DoE objectives.***

FVA testified on this matter before the full Ad-Hoc GSA Review Group on July 5, 2012. FVA would like to again take this opportunity to reiterate our concerns and views that address the current options available to GSA in its recommendations of green building systems, and to point out the relative merits and flaws within each of these options, which are three: the U.S. Green Building Council's *Leadership in Energy and Environmental Design* (LEED); the International Living Future Institute's *Living Building Challenge* (LBC); and, the Green Building Initiative (GBI) *Green Globes* system.

**LEED and LBC: Not LCA Based, Not Truly Consensus-Driven: <u>Not</u> Recommended:**

It is the opinion of the members of the Alliance that as currently construed, GSA should not recommend USGBC's LEED **or** the Living Building Challenge as part of their Energy Independence and Security Act (EISA) recommendations unless they are aggressively amended to include true consensus-driven decision making *and* LCA-driven approaches.

Both of these certification systems, such as now proposed in LEED v4 2012, seek to employ *arbitrary* chemical avoidance lists (the so-called "red-lists" philosophy) which essentially preclude flexible vinyl products, and other legitimate materials, from *full and fair* consideration of their merits and utility in green building applications, inclusive of their durability, which addresses *total cost of ownership, a key point in today's federal budget environment.*

Our problem with LEED and LBC stems from the fact that both these certification systems include complex "credit" disincentives that undermine material selection and specification, and could actually compromise GSA's *own goals* of achieving critical energy efficiency and other key performance standards. And, these so-called, oxymoronic "negative-credits" are vaguely based on opinion, not science. We believe that disincentives for using proven, safe, legitimate, high-performing materials as a choice in green building systems, is unwarranted and anti-competitive. For these, and other reasons, FVA cannot in good faith recommend the consideration of LEED or LBC, as currently construed, as recommended *federal* rating systems.

**GBI Green Globes: ANSI-Certified, LCA-Based: Recommended**

In lieu of LEED and LBC, we would prefer a true Life-cycle assessment (LCA) approach, also known as life-cycle analysis, and/or cradle- to- grave analysis, such as employed by Green Globes, now also being included as a possible recommendation to DoE by GSA. We concur. LCA is a technique to assess environmental impacts associated with **all** the stages of a product's life cycle, i.e., from raw material extraction through materials processing, manufacture, distribution, use, repair and maintenance, and disposal or recycling. LCA's can help avoid a narrow outlook on environmental concerns by:

- Compiling an inventory of relevant energy and material inputs and environmental releases;
- Evaluating the potential impacts associated with identified inputs and releases;
- Interpreting the results to help make a **more informed decision.**

Resident in the Energy Independence Security Act (EISA) of 2007 is language providing for a general legislative framework for federal green building efforts, including definitions of green buildings, as such: "a building that integrates and optimizes all major high-performance building attributes, including energy efficiency, durability, life cycle performance, and occupant productivity."

We believe that *only* GBI's *Green Globes*® is fully transparent, consensus-based (via its ANSI credential) and life-cycle oriented, and adheres to the principles established in EISA, as cited. Like LEED and LBC, Green Globes is a voluntary certification system. Green Globes covers project management, site, water use, energy use, indoor environmental quality, and resource, building materials, and solid waste, and is *ANSI certified*, which sets it apart from the competing systems. And a study released recently by the U.S. General Services Administration shows that *Green Globes®*, exclusively offered in the United States

by the Green Building Initiative (GBI), “aligns with more of the federal sustainability requirements than any other green building rating system for new construction -- including LEED.”

**Conclusions:**

Per federal data, the U.S. government owns and leases nearly 3.4 billion square feet of real estate and is the largest consumer of energy in the United States. We hope, as the nation’s landlord, you can grasp that the *arbitrary* declaration of what materials are “green” by private-sector, voluntary building certifiers (such as LEED and LBC) is contrary to the interests of GSA, but also the U.S. manufacturing base, especially the U.S. plastics manufacturing industry --- we should not forget that manufacturing still contributes more than 10% of our gross domestic product, and a majority of our vinyl products are home-grown.

Arbitrary, material-related disincentives, such as being proposed in LEED and LBC (as currently construed) work against GSA objectives, do not make for sound policy, would add immeasurably to total building costs with little or no benefit, and are therefore not the wisest use of taxpayer’s money, in our view. Current federal budget climates would indicate a concern by GSA for the “best and wisest” expenditures of increasingly-scarce funds for the highest return on investment in federal green facilities, thus enhancing the rate or return for the taxpayer’s federal outlays.

We again thank you for the opportunity to comment, and we trust that through public input such as FVA’s that the General Services Administration will recommend the appropriate green building standards for federal use, which capture the stated intent of GSA to make *informed* decisions on the recommendations for green building standards

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