



Flexible Vinyl Alliance

Comments Submission to the General Services Administration

General Services Administration
Office of Federal High-Performance Green Buildings
Green Building Advisory Committee Public Meeting/Listening Session
GSA HQ
Washington, DC
June 29, 2012

To Whom This May Concern:

FVA is pleased to provide comments on the General Services Administration's Green Building Certification review as they relate to the June 25, 2012 listening session held at GSA headquarters.

The FVA is a coalition of trade organizations, materials suppliers, compounders, formulators, molders and fabricators of flexible PVC products who are currently concerned with regulatory and legislative attempts to debate, limit or "de-select" flexible vinyl products in commerce. The FVA provides messaging and advocacy on the proven safety, economy and utility of flexible PVC, a material used in a wide range of health care, recreational, military, automotive, building, flooring, construction and packaging applications for more than 50 years. FVA operates as an Affiliate of SOCMA, and is based in Washington, DC.

Flexible vinyl represents a \$20B industry in the United States, and companies involved in the flexible PVC value chain employ in excess of 240,000 people. As such, we are part of a larger constituency of some 900,000 workers employed by the overall plastics industry in this country.

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 its Energy Independence and Security Act (EISA) review, unless they are amended. Both of these certification systems seek to employ arbitrary chemical avoidance lists, which essentially preclude flexible vinyl products from full and fair consideration of their merits and utility in green building applications.

From cool PVC roofs, to carpet backings to vinyl wall coverings, to furniture upholstery to wire and cable sheaths to resilient flooring, PVC products have much to recommend them. They are economical, durable, recyclable, and high-performing. In some cases, PVC is essential to occupant safety via the flame-resistant wire and cabling in building plenum spaces.

Our problem with LEED and LBC stems from the fact that both these certification systems include chemical avoidance lists that undermine material selection, and compromise GSA's own goals of achieving critical energy efficiency and other key performance standards essential to federal green buildings, including the durability of such products. We believe that singling out flexible PVC as a compromised choice in building systems, is unwarranted and anti-competitive, and is based only on arbitrary opinions about the relative safety of softening additives, known as phthalates, that are critical to properly engineering our vinyl products.

In lieu of LEED and LBC, FVA prefers 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 recommended by GSA. 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 think PVC products meet and exceed these criteria, in many or most cases.

We also believe that only GBI’s *Green Globes*® is fully transparent and life-cycle oriented, and adheres to the principles established in EISA, as cited. Like LEED, 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. 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.”

Per your own 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 the U.S. manufacturing base, and especially the U.S. plastics manufacturing industry --- we should not forget that manufacturing still contributes more than 11.2% of our gross domestic product, and a majority of our PVC products are home grown.

Market exclusions such as being proposed in LEED and LBC work against us, is not good policy, and is not the wisest use of taxpayer's money.

Government needs to be a good steward and a smart consumer of "eco-friendly" choices. LEED should not be a monopoly within federal government Green Building Guidelines, nor at the state, local and private sector level. Competition is warranted, but not via LEED in its proposed 2012 edition and certainly not LBC, which is "philosophy based" – anathema to LCA.

Thank you for your consideration of the comments of the Flexible Vinyl Alliance.

Submitted:
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