



**Flexible Vinyl Alliance**

**COMMENTS OF THE FLEXIBLE VINYL ALLIANCE (FVA)  
TO THE  
U.S. GREEN BUILDING COUNCIL (USGBC)  
ON THE  
LEED 2012 MR CREDIT:  
“AVOIDANCE OF CHEMICALS OF CONCERN”**

**March 26, 2012**

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 jobs in 47 states.

We are writing to express concern with the U.S. Green Building Council’s proposal to include a *Materials and Resources (MR) Credit: Avoidance of Chemicals of Concern* as a part of LEED 2012. If approved, this proposal would encourage the construction industry to de-select the use of high performance PVC and certain plasticizers.

The FVA believes that the inclusion of the *Materials and Resources (MR) Credit: Avoidance of Chemicals of Concern* in LEED 2012 is misguided and unjustified for the following reasons:

**The LEED 2012 proposal runs contrary to the findings of USGBC’s own Technical and Scientific Advisory Committee (TSAC) Report of 2007**

This proposed credit is not supported by USGBC’s very own research conducted at the request of the LEED Steering Committee. The committee, after completing an intensive report that looked at the technical and scientific basis for a PVC-related credit, issued a report (in 2007) that concluded “no single material shows up as the best across all the human health and environmental impact categories, nor as the worst” and recommended *avoiding* a materials-based credit that could lead designers to choose materials with more negative impacts. By disregarding the recommendations in the TSAC’s report, LEED 2012 could prompt builders to switch to alternative products that are not “drop in” substitutes for PVC and phthalate plasticizers, and for which *much less* is known about their safety and performance capabilities.

**The LEED 2012 proposal overlooks the numerous benefits that PVC products provide in building and construction settings**

PVC and phthalate plasticizers are commonly used in high-performance flooring, roofing, wall covering, and wire and cable applications. These plastic materials are vital in producing building-related “essentials” such as fire-retardant roofing, non-brittle and high-performing wire and cable, as well as multi-purpose equipment and accessories. These types of materials are a “product of choice” as they are easily maintained and cleaned, can endure weathering, abrasion and demanding “high-use” conditions, while still performing consistently. Such characteristics make them particularly well-suited for building and construction purposes.

**The LEED 2012 proposal attempts to target PVC --- an inherently “green” material**

PVC resin is half-derived from common salt, and is one of the more energy-efficient materials to manufacture. Vinyl is durable and lasts for decades with little maintenance as compared to other materials. At the end of its typically long life, vinyl can be recycled as well as other competing building materials.

The U.S. Green Building Council, European Commission and the state of California have studied PVC’s attributes and performance benefits and have concluded the overall impacts were in line with those of other materials — and that vinyl could perform **better** than competing materials in several applications.

It should also be noted that vinyl products are constantly being improved and new products are being certified as “environmentally sound” by third parties under programs such as FloorScore, Green Label Plus, and Greenguard. And, specifying vinyl saves money, due to its lower production costs, durability and longevity in building environments.

**LEED 2012 was not developed in a fully transparent process, and the imposed response time seems particularly short**

Transparency in the LEED process has been noticeably lacking. Timing is also short. The USGBC would benefit from additional consultation and maximum opportunity for comment. Given the short turnaround time, though, FVA is concerned that interested and affected stakeholders, especially those that are running companies and have few resources to dedicate to short term, high-impact extraneous proposals such as LEED 2012, will not have the capacity to comment. We would have preferred additional time, but are submitting these comments under the guidelines laid out to us. However, as a rule, short-term artificial timelines for such far-reaching proposals, in our opinion, are anathema to best-practices in standards development.

In conclusion, FVA would prefer that USGBC remove the *Materials and Resources (MR) Credit: Avoidance of Chemicals of Concern* from LEED 201, for the reasons stated here, and ask that you consider our comments in the context of those from other business and chemical trade groups (and their allied members) that support FVA including: the Vinyl Institute, the Society of the Plastics Industries, and the Resilient Floor Covering Institute.

Thank you for your consideration of our viewpoints.

Respectfully Yours,

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