



Nov. 21, 2011

Mr. Ken Sandler
Designated Federal Official
Office of Federal High-Performance Green Buildings
Office of Governmentwide Policy
General Services Administration
1275 First Street, NE, Room 633D
Washington, D.C. 20417

via email: ken.sandler@gsa.gov

Re: Comments to Green Building Advisory Committee, General Services Administration, re Green Building Certification Review

Dear Mr. Sandler:

The Vinyl Institute¹ appreciates the opportunity to comment on the Green Building Certification Review discussed at the Nov. 9, 2011 meeting of the Green Building Advisory Committee to the General Services Administration. This review pertains to GSA's evaluation of green-building certification systems to be used for federal buildings.

The Vinyl Institute strongly supports efforts to ensure that new and refurbished federal buildings meet effective performance-based certification systems that will improve overall energy efficiency and lessen the environmental impact of these buildings. Vinyl building products are well-known for their durability, energy-efficiency, material conservation, cost-efficiency and other benefits. Increasingly, vinyl is being recycled at not only the post-industrial but also the post-consumer level as companies develop and grow take-back and recycled-content programs.

¹ VI is a U.S. trade association representing the leading manufacturers of vinyl, vinyl chloride monomer, vinyl additives and modifiers, and vinyl packaging materials. VI's mission is to advocate the responsible manufacture of vinyl resins, lifecycle management of vinyl products, and promotion of the value of vinyl to society. VI member companies include Formosa Plastics Corporation, U.S.A., OxyVinyls, LP, PolyOne Corporation, Shintech, Inc., and Westlake Chemical Corporation.

We urge GSA to embrace the following principles as it considers certification systems:

- **Recognize only certification systems developed through open, balanced, consensus-based processes.** Such programs may take time to develop and involve compromise, but they have been proven to be the most effective in bringing about the practices and performance that are the goal of green and sustainable programs.
- **Recognize only certification systems that are well-vetted in the marketplace and have a proven track record of sound performance through use by a range of building designers, owners and operators.** Set requirements for a minimum level of marketplace acceptance.
- **Recognize certification systems that emphasize measurable whole-building performance rather than prescriptive checklists and single-attribute criteria.** Criteria that are prescriptive, selective, narrowly focused (e.g., single attribute) or otherwise based on limited or biased evaluations are not likely to produce the greatest reductions in the energy/environmental impacts of buildings. In fact, their impacts may not even be measurable, as in the case of simplistic material-avoidance credits. Furthermore, they tend to serve narrow interests rather than broad sustainability goals. Criteria that are based as much as possible on complete and balanced comparisons of impacts among competing products/materials/services, informed by life-cycle inventory data, will produce the most measurable results and the most improved building performance. We believe in particular that credits regarding building materials should be based on comparative life-cycle analysis among competing products.
- **Encourage competition in the marketplace to drive sustainability practices, technologies and certification systems.** Competition from diverse approaches to green-building will produce the most meaningful advances. For example, Green Globes' use of Energy Star tools in its construction/renovation rating system spurred LEED to adopt those tools in its existing building rating system. Competition is also most likely to ensure that different standards and certifications are available for different building types, geographic regions and climate exposures. Office buildings and healthcare facilities, for example, operate differently and need to be certified differently. Support for proven alternative programs and systems (provided they meet the tests stipulated above for consensus, balance, and market acceptance) will advance this differentiation.

GSA announced it is considering three different certification systems: LEED, Green Globes and the Living Building Challenge (LBC). To our knowledge, only two of these were developed through any degree of openness and consensus, and the only ANSI-

certified system among them is the Green Building Initiative's Green Building Assessment Protocol for Commercial Buildings.

The LBC, as far as we know, was developed without the procedural safeguards of 1) openness, 2) balance of interest, 3) due process, 4) appeals process, and 5) consensus required by the National Technology Transfer and Advancement Act (Public Law 104-113) and prescribed under Office of Management and Budget Circular A-119. The LBC system includes a "Red List" of materials that, with a few exceptions, must be avoided entirely in building projects. PVC and other effective and widely used materials are on this list. The U.S. Green Building Council spent years studying the comparative health and environmental impacts of PVC and competing building materials in four major building product categories and concluded that PVC had no greater overall impact than the other materials, that no material could be considered categorically "best" or "worst," and that avoiding PVC could steer designers to materials that would perform worse in most impact categories. A rating/certification system providing credits that could be counter-productive based on extensive real-life data fails the test of acceptability.

Moreover, the LBC lacks a proven track record: VI understands that it has been used to certify only two buildings since it was created in 2006, which suggests a system that is not understood or accepted by the building/design community. Green Globes, on the other hand, has been used for retail, commercial, institutional and healthcare buildings in both the public and private sectors. Recently, the Dept. of Veterans Affairs committed to certifying buildings to Green Globes on some 140 campuses. This year, the number of Green Globes-certified buildings is expected to grow from 130 to about 400.

Finally, adopting or recommending a certification system such as the LBC would be tantamount to establishing a government-wide materials procurement policy when GSA itself has said it does not have such a policy. This would regulate materials outside of traditional administrative due process procedures.

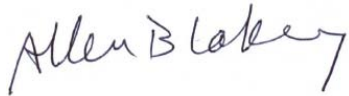
As for the other two standards being considered, we believe Green Globes has the stronger claim for federal use as a result of its ANSI certification. However, as noted above, the federal government should encourage competition by recommending to the Dept. of Energy as many standards as qualify under GSA's screening criteria, including conformance to OMB Circular A-119. In fact, GSA is required to preserve competition embraced within Federal Acquisition Regulations (FAR). This is particularly important since whichever certification systems are chosen as a result of GSA's recommendation will benefit financially from federal endorsement and use.

VI supports transparent, inclusive, consensus-based standards that take into account the full life cycle of a building. By encouraging development and adoption of rating systems and certification programs that measurably improve whole-building, full-lifetime

performance, GSA will help drive the evolution to a less energy-intensive and resource-intensive built environment.

We would welcome the opportunity for direct dialogue on building standards, if that would be useful to the Administration.

Sincerely,

A handwritten signature in black ink that reads "Allen Blakey". The signature is written in a cursive, slightly slanted style.

Allen Blakey
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