



Flexible Vinyl Alliance

**Comments of the Flexible Vinyl Alliance on:
"Building product disclosure and optimization - material ingredients (MRc4)"
LEED 2012 v4: Comment Period 6**

March 28, 2013

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.

Flexible PVC offers a value-laden and beneficial range of applications, including cost effective and durable building products. 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 are writing to express concern in this, comment period 6, with the U.S. Green Building Council's proposed LEED v4, specific to the Building Product Disclosure and Optimization component, or MRc4. We find the USGBC approach in this regard flawed, for the following reasons:

PROCESS: the American High Performance Buildings Coalition (AHPBC) of which FVA is a member, has shared with USGBC its concerns about the process that USGBC employs to reach "consensus" recommendations in its standards. As posed to USGBC in recent meetings and communications, the Coalition has asked:

- a. Can the USGBC TAGs (Technical Advisory Groups) include more material and product manufacturers?
- b. How can USGBC members, not currently represented on TAGs better provide technical input to LEED standard-setting decisions?;
- c. and, when will USGBC consider the expansion of its own internal LEED Steering Committee to include actual building product *manufacturers*, such as may be represented, for example, by the producer-members of the Flexible Vinyl Alliance?

These issues are still unresolved, and lacking movement in the direction of accommodating the AHPBC requests, we remain concerned that the process by which USGBC reaches "consensus" decisions on what provisions to include in updating its standards will lack the legitimate input of

a broad base of building product experts that we feel is critical to a true, transparent, consensus-based approach to standards-setting.

PRODUCT: due to the gaps in the process described above, USGBC has proposed, in our opinion, a flawed LEED v4 (6) “product” specifically, but not limited to, MRc4. The FVA endorses the comments of the Vinyl Institute (VI) in this regard, as well as those of the Society of the Plastics Industries (SPI) and the Resilient Floor Covering Institute (RFCI).

We understand the intent of MRc4 is to “encourage the use of products and materials for which life-cycle information is available,” that have “environmentally, economically, and socially preferable life-cycle impacts,” or that have been “verified to have improved life-cycle impacts.” But most of the compliance paths in this credit fail to take account of life-cycle evaluations or to advance the best material from a life-cycle perspective. This, in our estimation – the lack of true life-cycle assessments of building materials – is a significant flaw within the LEED proposal that is anticipated to be balloted for adoption in the summer of 2013,

USGBC has neglected to respond meaningfully to (or make important changes in response to) detailed concerns that many industry groups, and others, submitted in December 2012 comments regarding this credit’s over-reliance on hazard identification and on non-consensus “red lists,” among other problems. Adoption and approval of such red-lists represent a move away from objective, consensus and life cycle analysis based, ANSI accredited, green building certification systems such as Green Globes (GBI).

The one positive change in Draft 6, for which we can commend USGBC, is including a third compliance option that involves evaluation of risk along with safety, health and hazards. This one positive change, however, does not correct the overriding core flaws in the current proposed revision.

CONCLUDING REMARKS: FVA supports the concept and goals of “greener” buildings. Vinyl materials ideally suited for deployment in green building settings are varied, numerous, diverse and in many cases highly-engineered, built on principles of long-life (vinyl roofing as an example) functionality and safety (PVC-jacketed wire and cable as an example), sustainability (vinyl flooring and wall coverings as examples), recyclability (carpet backing as an example), and cost-effectiveness and performance (all PVC products).

Vinyl products meet these criteria, and are in many cases are the preferable “green choice” for deployment and utilization in sustainable buildings. However, it is the sense of the FVA that by not fully assessing life-cycle impact, and by the imposition of less-informed data sets related to life-cycle analysis (such as Cradle-to-Cradle, Green-Screen and Health Product Declarations – all private programs, based on simplistic hazard assessments) better building product choices, as represented by vinyl products, are being short-changed by lack of thorough and informed assessments from legitimate broad representation of materials, industry, and producer perspectives. We ask that USGB consider amending its process to yield a true consensus-based approach to the selection, recommendation, and accommodation of a full range of building product options.

Without reform of the USGBC process, we cannot endorse the use of LEED as a transparent, consensus driven model for broad adoption by government, commercial or residential construction and/or renovation.

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