

TO: The Green Building Community  
FR: Healthy Building Network

January 27, 2005

For the past several weeks, the Healthy Building Network (HBN) has been reviewing the highly technical draft report issued by the US Green Building Council's PVC Technical Science Advisory Committee Group entitled "**Assessment of Technical Basis for a PVC-Related Materials Credit in LEED.**" Charged with evaluating the evidence for a PVC related credit, the report concludes that "PVC does not emerge as a clear winner or loser ... the available evidence does not support a conclusion that PVC is consistently worse than alternative materials..."

This conclusion is surprising and troublesome in the face of the growing number of governments and corporations that have established toxics avoidance policies targeting PVC for reduction or elimination ([http://www.healthybuilding.net/pvc/corporate\\_policies.html](http://www.healthybuilding.net/pvc/corporate_policies.html)). Unfortunately, the TSAC's draft report not only fails to address the priority issue of the role of green buildings in protecting human health and the environment from some of the most toxic chemicals known to science, it threatens to undermine the progress that governments, green building professionals and manufacturers have made in realizing those goals.

**HBN's evaluation finds that there are *fundamental problems with the Task Group's analysis.* We have written a detailed critique of the TSAC's report that is available on the HBN website at <http://www.healthybuilding.net>.**

HBN's critique of the TSAC report boils down to two basic points.

First, the USGBC erred in its decision to attempt to make this policy decision based upon an untested and controversial combination of Risk Assessment and Life Cycle Assessment modeling. This model needs to be peer reviewed before it is used to set policy. Given the high uncertainties in data and the arbitrariness of many of the model's assumptions, it is no surprise that the ultimate conclusion was not conclusive.

In taking this route, the TSAC rejected without consideration the precautionary-based approach to toxic chemicals proposed in detailed submissions to the TSAC during the comment period ([https://www.usgbc.org/Docs/LEED\\_tsac/HBN\\_TSAC\\_PVC\\_Submission\\_040217.pdf](https://www.usgbc.org/Docs/LEED_tsac/HBN_TSAC_PVC_Submission_040217.pdf)). Even worse their new methodology contradicts the best practices of the green building industry itself, being practiced by leaders such as McDonough Braungart Design Chemistry ([www.mbdc.com](http://www.mbdc.com)), Kaiser Permanente, the Green Guide for Health Care, and manufacturing firms such as Firestone Building Materials, Herman Miller, Shaw Carpet, and Skanska.

Second, even within their own life cycle and risk analysis, the TSAC failed to include or properly account for a whole host of critical chemical exposure routes and sources, including: 65 tons of mercury lost by the PVC industry's chlor-alkali plants, transport workers exposed to cancerous vinyl chloride monomer leaks, students and newborns breathing phthalates off-gassing from vinyl flooring and carpets, and dioxin production from burning PVC in landfill fires – to name a few. There is no mention of the Association of Post Consumers Plastics Recycler's listing of PVC as a contaminant in 1998.

Time and time again the TSAC accepted unsubstantiated assertions by the chemical industry on issues as critical as factory emissions, while overlooking key scientific evidence confirming PVC's unique threat to the environment and public health.

Please take time to read through HBN's commentary (<http://www.healthybuilding.net>) and decide for yourself whether the TSAC's assessment is accurate. USGBC policy is member-driven, so your engagement is essential to keep the process democratic. Some potential points include:

- Green buildings should be environmentally healthy buildings that support efforts to change the market to end the use and production of priority toxic chemicals.
- The draft report uses complex, unproven, and inadequate models to assess and evaluate PVC and other building materials from an environmental health perspective and will not be useful to us as practitioners. Let's focus on using the straightforward best practices for screening materials for environmental harm that have been developed and recommended by leaders in academia, the environmental health and green building communities.
- If adopted, this methodology and the recommendations of this draft will confuse the market and undermine the evolution of best practice within the green building industry and elsewhere to develop chemicals policies, environmental health standards, materials evaluation tools, and green procurement guidelines driving the market away from toxic chemical use.
- The TSAC report recommends the pursuit of issue-based credits. As the USGBC develops LEED v3.0, the board should consider a credit that intends "to reduce the release of persistent bioaccumulative toxics (PBT's) to the environment." PBT's are the worst type of pollution like dioxin, lead, cadmium, and associated with all stages in the lifecycle of PVC. The Green Guidelines for Health Care contains three PBT credits: 8.1, 8.2, and 8.3. These credits could serve as a viable model for the PBT integration into LEED (<http://www.gghc.org>).

Please send comments to [tsac@committees.usgbc.org](mailto:tsac@committees.usgbc.org) using the comment form at <http://www.usgbc.org/LEED/tsac/pvcvinyl.asp>.

Please copy all correspondence to [matthew@healthybuilding.net](mailto:matthew@healthybuilding.net) and direct questions to Matthew Cacho at 206.547.1122.

The comment period is open until February 15<sup>th</sup>.

Thanks for your time and energy!