

**USGBC TSAC PVC Draft Report dated December 17, 2004 (released 12/22/04)  
OFFICIAL COMMENT SUBMISSION FORM**

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Submit to [tsac@committees.usgbc.org](mailto:tsac@committees.usgbc.org), any time before midnight on February 15, 2005.

**Comments submitted by:**

First Name	Last Name	Title	Organization	Phone	E-mail	Web site URL
Clifton	Curtis	Director, Global Toxics Program	World Wildlife Fund – U.S.	202/861-8379	<a href="mailto:Clifton.curtis@wwfus.org">Clifton.curtis@wwfus.org</a>	<a href="http://www.worldwildlife.org/toxics">www.worldwildlife.org/toxics</a>

**Comments:**

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		<p>February 10, 2005</p> <p>To: Members of the PVC Task Group c/o Technical Science Advisory Committee US Green Building Council</p> <p>Fm: Clifton Curtis, Director Global Toxics Programme WWF-US</p> <p><b>Su: Draft PVC TSAC Report</b></p> <p>To Whom It May Concern:</p> <p>WWF recently heard about the draft PVC report released by the US Green Building Council's PVC Technical Science Advisory Committee Group, titled "Assessment of Technical Basis for a PVC-Related Materials Credit in LEED." We are very disappointed to find out that the draft has taken the position that available evidence does not support the view that PVC is consistently worse than alternative materials. It appears that your task group has rejected the precautionary principle in its deliberations, which is very troubling, as is its decision to ignore the clear, evidentiary linkage between PVC and the release of dioxins and other unintentional persistent organic pollutants (POPs).</p>	

WWF's Global Toxics Program's lead target for our work program centers on eliminating and phasing out priority chemicals of concern, with PVCs being among those substances that are especially troubling. The manufacture, use, and destruction of PVC plastic and related materials is a major source of global dioxin emissions, with dioxins presenting a unique challenge in that they are not specifically manufactured and have no useful purpose. Instead, they appear solely as an unintentional by-product of processes, notably combustion, where organic carbon, oxygen, and chlorine are present. Such combustion is widely recognized as the greatest contributor to dioxin contamination in the industrial world.

PVC, for the above reasons, is extremely damaging to human health and the environment, posing serious threats throughout its life cycle. The U.S. Environmental Protection Agency has classified the most potent of the dioxins as a human carcinogen, estimating a 1 in 1000 risk to Americans from cancer due to exposure. Dioxins also are associated with a wide range of non-cancer effects including altered sexual development, reproductive problems, diabetes and organ toxicity.

Among other flagship activities, WWF is recognized for its role in helping governments negotiate an environmentally sound Stockholm POPs Convention during 1998-2001. We also promoted expedited governmental ratifications, resulting in its entry into force this past May, which sets the stage for the 1st conference of parties in May 2005. Twelve substances, including dioxins, are prioritized for action under the treaty.

Preventing pollution is always easier than controlling unwanted contaminants, hence WWF's prioritized efforts to encourage governments and the private sector to remove the makings of dioxin from the waste stream. Several leading companies, with U.S. operations, have stopped using PVC materials or are committed to taking that approach, including:

**Athletic Shoemakers:** Adidas, Asics, Nike, Puma

**Automobile Interiors:** Daimler Benz, Honda, Ford, General Motors, Volkswagen, Volvo

**Building Materials & Furnishings:** Carnegie Fabrics (wall covering, upholstery), Herman Miller (office furniture), Firestone Building Products (roofing membranes), Shaw (carpet)

**Consumer Products & Packaging:** Aveda, Body Shop, Bristol Myers, Helene Curtis, Honest Teas, IKEA, Intimate Brands (Victoria's Secret, Bath & Body Works)

**Electronics:** Apple, Sharp, Sony

**Food Packaging:** Federated Groups (food packaging), Eagle Brand – Cremora Brand (food packaging), Dean – Milk Chug brand (food packaging)

**Healthcare:** Kaiser Permanente, Universal Health Services, Tenet Health Corporation

**Toys:** Big Toys (playgrounds), Brio, Chicco, Early Start, First Years, Lamaze Infant Development, Lego Group, Little Tykes, Mattel

The approach adopted in your task group's draft report runs counter to these noteworthy efforts, serving instead as cover for architects, builders, and home product producers to continue contributing through their building-related decisions to the release of dioxins over time, leading to harmful dioxin releases resulting from PVC materials and products. For these reasons, we ask that you please reconsider the Risk Assessment and Life Cycle Assessment modeling you've signed onto in the draft, and as a first step ensure that your approach is peer reviewed before it allowed to be used as a basis for setting policy with such widespread ramifications.

In the view of WWF's Global Toxics Program, a far more sustainable policy, for purposes of protecting wildlife, human health, and the environment, would be to come in line with the best practices of the companies listed above. We urge you to consider joining in support of the emerging realities that those companies have embraced, contributing to the cause of sustainable development.

Thanks for your consideration of these comments,

Clif Curtis

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