



International POPs Elimination Network

February 12,
2004

Nigel Howard, Vice President
U. S. Green Building Council
1015 18th St. NW, Suite 805
Washington, DC 20036

Dear Mr. Howard and TSAC Member,

I am writing in response to the US Green Building Council's Solicitation for PVC Stakeholders inviting comment on the proposed methodology for evaluating a PVC related credit within the LEED Rating System.

The International POPs Elimination Network (IPEN) is a global network of public interest non-governmental organizations working together for the elimination of persistent organic pollutants. The Network has grown to include more than 350 public health, environmental, consumer, and other non-governmental organizations in 65 countries. Furthermore, IPEN mobilizes grassroots support for the implementation of Stockholm Convention, therefore we share our concern for PVC as a potential Persistent Organic Pollutant (POP) which should be considered within the LEED system.

It is our understanding that presently the US Green Building Council's building rating system known as LEED does not encourage the avoidance of materials such as PVC that generate environmental releases of persistent bioaccumulative toxins (PBTs) and Persistent Organic Pollutants (POPs). We request that the proposed methodology for evaluating a PVC-related credit specifically give significant weight to the use and release of these uniquely dangerous chemicals during production, use, and disposal of PVC and its alternatives. No less than four PBTs are directly associated with PVC manufacturing, use and disposal: cadmium, lead, mercury, and dioxins & furans, which are also classified as POPs.

The Stockholm Convention on Persistent Organic Pollutants, signed by the Bush Administration along with officials from 90 other countries in May 2001, commits signatories "to reduce the total releases [POPs] with the goal of their continuing minimization and, where feasible, ultimate elimination." The US Green Building Council's Standards should follow this US and international directive.

Our organization supports the recommendations which the Healthy Building Network has made in its extensive comments. Please keep us informed of the Council's actions on this issue, and feel free to contact me if you have any questions or require further information.

Sincerely,

Bjorn Beeler
IPEN International Coordinator