

DOES THE US GREEN BUILDING COUNCIL CONSIDER THIS RESPONSIBLE FOREST MANAGEMENT?



NEW PILOT ALTERNATIVE COMPLIANCE PATH IN LEED COULD BE A STEP TOWARD VERIFIED LEGALITY OF FOREST PRODUCTS OR A CAPITULATION TO BIG TIMBER

LEGAL FORESTRY IN THE US, CERTIFIED BY THE SUSTAINABLE FORESTRY INITIATIVE. IMAGE © F. EATHERINGTON



IN A SURPRISE MOVE, USGBC RECENTLY ANNOUNCED a new **Alternative Compliance Path (ACP)** for the Materials & Resources credits in LEED 2009 and LEEDv4 that recognize certified wood. The ACP rewards the use of wood certified under ALL forest certification systems – including notably the timber industry-backed Sustainable Forestry Initiative (SFI) – whereas previously these credits had only recognized wood certified according to the rules of the Forest Stewardship Council (FSC).

This came as a shock to almost every major environmental group who are united in support for FSC as the highest standard for forest certification, and in **opposition to SFI** as an industry-governed and financed greenwash system that seeks to pass off environmentally destructive industrial forestry as somehow “sustainable.” Among other things, SFI certifies vast clearcuts, the replacement of complex forest ecosystems with monocultures, and logging that harms water quality and jeopardizes already imperiled fish and wildlife. Also, SFI does not require the Free, Prior and Informed Consent of Indigenous Peoples when logging on their lands.

USGBC made this move after a dozen years of intensive lobbying by the logging industry and the politicians that support it for the inclusion of SFI in LEED:

- **gubernatorial and legislative bans** on the use of LEED in half a dozen states, and attempts to ban LEED in many more;
- sign-on letters from **governors and members of congress** from states where the timber industry is dominant;
- **attempts to ban or limit** the use of LEED for federal construction; and
- aggressive promotion of a **competing green building rating system**, Green Globes, that’s largely a creation of the timber industry.

“ I DO NOT BELIEVE THAT THIS IS JUST ABOUT ILLEGAL LOGGING...IT IS ABOUT SUPPORTING RESPONSIBLE, CERTIFIED MATERIALS IN THE SUPPLY CHAIN AS WELL. IT DOES OPEN IT UP [FOR SFI AND OTHER PROGRAMS] TO BE RECOGNIZED FOR CREDIT IN THE LEED RATING SYSTEM. ”

—SFI VP JASON METNICK



In spite of this pressure campaign, in 2010, a proposed re-write of the certified wood policy that would have created a pathway for the inclusion of SFI in LEED **failed to obtain sufficient support from the USGBC membership.**

Given the history, it’s deeply troubling that the new ACP accepting SFI appears to have been developed and pushed through by USGBC upper management without any meaningful consultation of external stakeholders (e.g. sustainable design leaders, experts in forest legality, environmental groups) – with the possible exception of the logging industry and its affiliates.

The stakes are high: since SFI largely affirms the *status quo*, while FSC embodies environmental and social improvements in forest management, by supporting FSC, LEED has played a key role in driving market transformation of the forest products industry. Unfortunately, unless the right steps are taken, the ACP has the potential to undermine this effect, which is vital for the well being of forests and forest-dependent peoples around the world.

The saving grace is that there is language in the new ACP and in USGBC’s communications around it suggesting that the purpose of the pilot is to test the feasibility of a new LEED prerequisite requiring evidence of legality for 100% of the wood used in LEED projects. Given that **illegal logging is rampant** in many parts of the world, and trading in illegal wood is now against the law in the United States, the European Union, Japan and Australia, **this would be a positive step that everyone could support.**

However, there are reasons to doubt whether this is the direction that things are actually headed. Within 24 hours of USGBC’s announcement of the ACP, SFI, the American Tree Farm System and the American Forest & Paper Association implemented a coordinated communications plan, all releasing statements of their own. Within 72 hours, SFI even announced a new webinar “explaining” the new credit language. Such a high degree of preparation and orchestration suggests that SFI and its allies knew this was coming for some time and that USGBC and industry worked together on the ACP behind the scenes.

Predictably, the industry statements make only passing reference to eliminating illegal wood, emphasizing that this is about the inclusion of their forest certification systems in LEED.

At the heart of the ACP's flaws is the ASTM standard that it references (D7612-10). Not only does this standard establish all forest certification systems as equivalent, it defines as "responsible" ALL timber logged in North America – whether certified or not! And its definition of legal wood is woefully inadequate. Not surprisingly, there were no environmental groups involved in the development of this standard

If USGBC is serious about a legal wood prerequisite, then why didn't they consult the leading groups working on illegal logging?

Ever since 2008 when the amended Lacey Act made it illegal to buy or sell wood in the US that has been illegally logged or traded in the country of origin, numerous non-profit organizations have dedicated themselves to generating information, guidance and tools designed to help companies and government entities comply. Several of them have offices conveniently located in Washington DC, including respected names like World Resources Institute, World Wildlife Fund, the Environmental Investigation Agency, Greenpeace and Global Witness. If the ACP is truly a good faith effort to support the Lacey Act and similar legislation in other countries by keeping illegal wood out of LEED projects, why didn't USGBC consult these groups? Why did USGBC choose instead to rely on a flawed standard that has the SFI industry's fingerprints all over it?

USGBC and LEED have done a tremendous amount of good over the years, channeling inspired effort and innovation in support of healthier buildings, improvements in water and energy conservation, greener materials...and truly responsible forest management.

THIS IS NO TIME TO STEP BACK FROM THIS LEGACY OF LEADERSHIP

If the true purpose of the ACP is not to recognize forest certification systems that are weaker than FSC and not to consecrate all North American wood as "responsible"...

If in fact its objective is a worthy prerequisite designed to screen illegal wood out of LEED projects...

then USGBC needs to state this emphatically and unequivocally, correcting the misrepresentations of SFI and its allies.



SFI APPROVED LOGGING, PLUM CREEK TIMBERLANDS

THE FACT THAT THE USGBC HAS DECIDED TO TREAT ALL CREDIBLE FOREST MANAGEMENT CERTIFICATION SYSTEMS AS EQUALLY ACCEPTABLE COULD BE CITED IN DISCUSSIONS REGARDING WHICH SUSTAINABLE FOREST MANAGEMENT CERTIFICATION PROGRAMS ARE ACCEPTABLE FOR PAPER-BASED PRODUCTS... AF&PA HAS WORKED ON THIS ISSUE FOR MANY YEARS; IT IS ENCOURAGING TO SEE USGBC OPEN ITS STANDARD TO RECOGNIZE ALL CREDIBLE CERTIFICATION SYSTEMS, IN ALIGNMENT WITH OUR POLICY.

—JEFF BRADLEY, MANAGER FOREST & WOOD PRODUCT POLICY, AF&PA