



## The Toxic Loophole in Environmental Product Declarations (EPDs)

*What you need to know before taking EPDs seriously.*

LEEDv4 and EPDs have a giant toxic loophole that designers and green building professionals need to know about.

Under the current International Standards Organization's (ISO) 14025 rules that govern what has to be reported in EPDs, manufacturers are not required to publish their products' impacts on human health and ecological toxicity. Toxic products can qualify for the LEEDv4 EPD credit for disclosing some environmental impacts, while omitting information about their ecotoxicity and human health toxicity throughout their life cycle. And Health Product Declarations (HPDs) and other transparency tools elsewhere in LEEDv4 don't fill this gap, because HPDs only reveal the chemical contents of the product as installed and don't address the chemical hazards associated with extraction, manufacturing, or disposal.

As things currently stand, this toxic reporting loophole in EPDs also means they could be in violation of the Federal Trade Commission's Truth in Advertising Law and, as such, may be illegal.

**Q.** Where are these toxic impacts covered in an EPD?



Toxins can be released into the environment during a product's extraction and manufacturing phase. Dioxin is an unwanted toxic byproduct of PVC manufacturing.



Toxins can leach into the environment during a product's end-of-life and disposal phase.

**A. They aren't included.** EPDs need to report ALL relevant impacts to human health and the environment, including Human Health Toxicity, Ecotoxicity, and other environmental impacts. The US EPA and state governments keep track of emissions of most toxic chemicals from manufacturing plants. Manufacturers need to be held accountable for researching and reporting these impacts in EPDs.

According to the Federal Trade Commission (FTC) Environmental Marketing Guides, EPDs qualify as 'general environmental claims' and are required to fully substantiate their advertised benefits. Thus an EPD for a product that has toxicity impacts must identify these impacts, or else the EPD could be considered deceptive and may be in violation of the FTC Truth in Advertising Law.

***Don't accept the status quo. Insist that EPDs address all human health and toxicity impacts, and use site-specific information instead of industry averages before taking them seriously. As things stand, EPDs only serve to greenwash toxic products and put manufacturers who have healthy, non-toxic products at a disadvantage.***

For additional info:

<http://greenwashaction.org>

<http://blog.perkinswill.com/fixing-toxic-loopholes-leed-v4-epds/>

<http://healthybuilding.net/news>

<http://pharosproject.net/blog/detail/id/79/chemicals-of-concern-found-in-floorings-wallcoverings>