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**COALITION FOR RESPONSIBLE WOOD USE  
RECOMMENDATIONS TO THE MR TAG  
FOR THE FUTURE OF THE CERTIFIED WOOD CREDIT  
9/28/07**

- 1) LEED should continue to award a point (or points) only for FSC-certified wood or its equivalent.
- 2) In its credit structure, LEED should continue to treat wood separately from other bio-based materials.
- 3) LEED should establish and phase in a new MR prerequisite that creates an effective screen against illegally logged wood.
- 4) All bio-based materials should have to meet minimum standards for sustainability to be rewarded by LEED.

**Recommendation #1:** *LEED should continue to award a point (or points) only for FSC-certified wood or its equivalent.* We believe that the recent report to the MR TAG by the Yale School of Forestry (the Yale Report) makes clear that SFI, CSA etc. are not currently equivalent to FSC. It also lays out a possible procedure for determining true FSC equivalency at some point in the future, though we believe the suggested approach needs further refinement. Otherwise stated, only products from forest certification systems that meet the “Prescriptive benchmark” (and that meet the higher, “Target benchmark” in the future) should be actively rewarded by LEED by contributing to the earning of a LEED point or points.

**Rationale:** The underlying values inherent in FSC and the Prescriptive benchmark are most in tune with the stated mission and goals of USGBC and are most broadly supported by the green building community. Availability of FSC products is good and is improving, as evidenced by the fact that approximately 30% of LEED projects have achieved MR 7. Also, it should be axiomatic that a leadership standard in green building should only reward a leadership standard in forest management – one that encompasses social as well as environmental responsibility. Forest certification systems that meet the Yale Report’s “Flexible benchmark” represent the *status quo* of industrial forestry in North America and elsewhere, which often entails environmentally destructive practices. Nowhere else in LEED are points deliberately awarded for *status quo* practices, methods, and materials. Finally, as the Yale Report points out, the likely consequence of awarding points to

multiple forest certification systems will be a) to lead a majority of firms to gravitate to the certification system(s) that represent lowest levels of practice (and hence lower operational costs), and b) to lead many LEED project teams -- especially those not seeking the highest levels of LEED recognition -- to opt for the most readily available products (SFI, CSA) over the currently more difficult-to-obtain products (FSC). This in turn would undermine the market transformation effect that LEED is currently having on the forest products industry whereby it drives improvements in mainstream industrial forestry by rewarding only leadership practices.

**Recommendation #2:** *In its credit structure, LEED should continue to treat wood separately from other bio-based materials. Wood should not be lumped in with other bio-based materials.*

**Rationale:** Forests are crucial for global environmental health and sustainability. As the Earth's most diverse terrestrial ecosystems, they are irreplaceable reservoirs of biodiversity and represent far more than the trees that grow there. Also, they provide a unique array of critical environmental services, including the regulation of regional and global climate, the storage and slow release of water, the stabilization of soils, etc. As such, forests and forest products should be treated separately in the LEED credit structure from other bio-based materials, most of which come from industrial agriculture-based monocultures.

**Recommendation #3:** *LEED should establish and phase in a new MR prerequisite that creates an effective screen against illegally logged wood. This essentially reflects the position of the Yale Report, but more work needs to go into developing the details of the "screen," and specifically illegal logging needs to be defined comprehensively. The MR TAG should seek expert assistance from a number of organizations working on this issue, including for example World Wildlife Fund, SmartWood, and the Environmental Investigation Agency.*

**Rationale:** No illegal wood belongs on a green building project, and the green building movement can and should actively combat illegal logging by prohibiting the use of illegal wood through a new LEED prerequisite. Such a move would put the USGBC at the forefront of national and international efforts to combat illegal logging (the U.S. Congress and the European Union are actively working on legislation and policy that addresses this issue). It would also be consistent with USGBC's priority focus on combating global warming. This is because illegal logging is associated with deforestation, particularly in the tropics, and deforestation is in turn the second largest source of global carbon dioxide emissions (up to 25% of the total) after the energy sector.

**Recommendation #4:** *All bio-based materials should have to meet minimum standards for sustainability to be rewarded by LEED. Wood is not the only bio-based material that should have to meet basic standards of social and environmental responsibility. LEED should hold all bio-based materials to high standards, e.g. FSC certification for bamboo and organic certification for agricultural products. Such requirements could be phased in to give relevant industries time to adjust and to create an incentive for the establishment and/or evolution of relevant certification programs.*

**Rationale:** MR 6 currently rewards rapidly renewable materials, but from a sustainability standpoint, rapid growth may matter little. More important are other factors like sustainable yield (not harvesting more than grows back over the harvest cycle), chemical use, impacts on ecosystems and biodiversity, labor rights and worker safety, etc. Bamboo grows quickly, but there is nothing to prevent people in the developing world from clearcutting natural forests to make way for bamboo plantations, and in this context rapid growth is virtually meaningless.