

DRIVING LEADERSHIP IN PERFORMANCE AND DISCLOSURE IN LEED 2012

STATEMENT OF CONSENSUS

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STATEMENT OF CONSENSUS

As the U.S. Green Building Council (USGBC) moves toward finalizing LEED 2012, the undersigned organizations have prepared this Statement of Consensus with respect to the recognition of leadership performance standards and disclosure tools for building materials in LEED.

PREMISE OF THIS STATEMENT

Leadership performance standards and **disclosure tools** fulfill different purposes for the green building community. Accordingly, they should be clearly distinguished as to their purposes, strengths, and weaknesses, and they should be treated and valued differently within LEED.

The purpose of leadership performance standards and their associated eco-labels is to ensure conformance with rigorous, transparent, and auditable criteria for environmental, human health and/or social performance, and to identify products or processes that meet their requirements.

The purpose of LCA-based disclosure tools – Environmental Product Declarations (EPDs) and Life Cycle Assessments (LCAs) on which EPDs are based – is to identify, quantify, and disclose certain measurable environmental impacts of products and processes.

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STRENGTHS AND WEAKNESSES

LEADERSHIP PERFORMANCE STANDARDS

STRENGTHS:

Performance standards can establish and recognize best practices in order to reduce, avoid, and prevent negative impacts.

Conformance to leadership standards assures a minimum threshold of ongoing performance that reaches beyond the status quo.

WEAKNESSES:

Performance standards are not generally designed to disclose environmental impacts across all phases of the product life cycle (e.g., raw materials extraction, manufacturing, distribution, use, and end of life).

Performance standards do not always differentiate between products that meet a given standard's minimum requirements and those that greatly exceed them.

LCA-BASED DISCLOSURE TOOLS

STRENGTHS:

Disclosure tools can reveal environmental impacts across many life cycle phases, illuminating opportunities for improvements.

Although still in their infancy, disclosure tools have the potential to positively impact the building industry over the long term by providing a much-needed means of evaluating different aspects, characteristics or life cycle details of product environmental impacts. When developed and applied appropriately, disclosure tools have the potential to support and significantly strengthen leadership performance standards.

WEAKNESSES:

Disclosure tools – in particular those recognized in the second draft of LEED 2012 – typically do not address a full array of important environmental, human health, and/or social issues and do not prohibit harmful practices. This poses great risks to decision-makers. For example, an LCA might indicate that an assembly of products performs 15% better than a baseline in certain impact categories (e.g., eutrophication, acidification). This same assembly could also contain products with very negative raw material extraction impacts (e.g., ecosystem disruption – an impact category outside the boundary of almost all LCA tools), with the consequence that an assembly whose net impacts may be significantly negative could qualify for LEED points.

Disclosure tools currently often fail to account for the site-specific impacts of raw material extraction, distribution, manufacturing, and disposal, relying instead on aggregated data. Therefore, they do not represent the true impact of a specific product or material from a particular producer. Because of these shortcomings, EPDs, if solely based on LCA, may be seriously misleading as to true product benefits and liabilities.

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KEY POINTS

- Given their fundamental differences, performance standards and disclosure tools cannot substitute for one another. Even the most robust and comprehensive performance standards and disclosure tools should be considered complementary to one another.
- The credibility and rigor of both performance standards and disclosure tools vary significantly.
- Certain leadership performance standards enjoy support from a broad spectrum of stakeholders, are well developed, and have been applied extensively. By contrast, disclosure tools are at an early stage of development, have not been extensively utilized, and there is not yet agreement on which tools represent true leadership. While their use of aggregated and incomplete data may be the 'state of the art' at present, this substantial limitation creates legitimate challenges to their validity.

GENERAL RECOMMENDATIONS

In light of the preceding points, the undersigned organizations urge the U.S. Green Building Council to adopt the following recommendations in the development of LEED 2012:

1. Recognize the fundamental differences between performance standards and disclosure tools in LEED; address them separately, with distinct credits. LCA-based disclosure tools should not be used to evaluate performance because they cannot yet do so reliably.
2. Identify performance standards that exemplify industry leadership, consistent with LEED's core aims, and reward only these leadership standards. Encourage the development of leadership performance standards for industries where they don't currently exist.
3. In allocating points, reward high performance over simple disclosure. The LEED standard should reflect the mission of USGBC by continuing to put primary emphasis on performance, while incentivizing disclosure and thereby encouraging progress in this arena. Building materials that meet high performance standards should be rewarded far more heavily than those subjected only to disclosure tools.
4. Require that LCA-based disclosure tools recognized in LEED 2012 report all "environmentally relevant" impacts linked to the product or material in accordance with ISO 14044, and require that the development of underlying Product Category Rules involve industry, environmental, and other stakeholders in an open, transparent process.
5. Engage USGBC members and other stakeholders to better understand the importance of – and differences between – performance standards and disclosure tools.
6. Receive these recommendations in the spirit in which they are offered – one of collaboration and constructive dialog – and consider engaging with the signatories to find workable solutions to the balanced recognition of leadership performance standards and LCA-based disclosure tools in LEED 2012.

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