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Guest op-ed response: The chemistry behind sustainable building design

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The {NEREJ} guest editorial ("Why LEED matters for future generations", February 26 - March 6 issue), which aimed to inform your readership across New England about the importance of energy efficiency and sustainable building design, regrettably conflated often-repeated myths about chemical safety with laudable green building goals.

The chemical industry strongly supports green building. Nearly every energy efficient product and application is enabled by chemistry. These innovations in chemistry are helping residential and commercial buildings become more sustainable and energy efficient through foam insulation, insulated electrical wiring, reflective roofing, windows with engineered frames and glazing, durable skylights, air and water resistant building wraps, compact fluorescent lighting, and solar solutions.

ACC has historically been supportive of The U.S. Green Building Council's (USGBC) green building rating system, Leadership in Energy and Environmental Design (LEED). But, as the Center for Environmental Innovation in Roofing (CEIR) recently pointed out, "USGBC made the decision to develop the current version of its green building rating system, LEED v4, through a process that eschewed the input of building experts and favored special interests over consensus." The result has been the addition of new provisions that discourage the use of certain products and materials without a scientific basis for doing so. In fact, many American-made products that enable the very efficiency enhancements, environmental performance and sustainability improvements that LEED purports to promote are now discouraged in LEED v4. LEED is now dabbling in complex and specialized areas -- like chemical safety - that require capabilities and expertise that USGBC simply does not have.

Sadly, the author also used his column to present an overly simplistic view of chemicals in commerce, disregarding the significant body of science surrounding the safe use of chemicals, along with decades of public health research. The author is correct in noting that modern science now allows us to collect data that measures exceedingly minute traces of naturally occurring and man-made substances found in our bodies; however, the Centers for Disease Control and Prevention has stated the mere presence of a chemical in the body 'does not mean that it will cause effects or disease.'

ACC and our member companies take the safe use of chemicals very seriously. Our members undertake extensive scientific analysis to evaluate potential risks of their chemicals - from development of chemicals, to their proper use by manufacturers and consumers, to their safe recycle, reuse or disposal. We are committed to making information about our chemistries available to the public, enhancing cooperation with regulators and working with other manufacturers and the entire value chain to support the safe manufacture and use of all products, including building materials. Furthermore, we believe it is important to continue to examine the data related to typical

chemical exposure and partner with the broader scientific community to develop tools to help the building and construction community use this information to make scientifically sound decisions.

Today, more than a dozen federal laws govern the safe manufacture and use of chemicals. And we believe even more can be done to enhance consumers' confidence in the use of chemicals in commerce. ACC is a strong supporter of bipartisan legislation in Congress that would update our nation's primary chemical law, the Toxic Substances Control Act (TSCA), for the first time in a generation.

ACC and our member companies believe that green building ratings systems and standards can be an important tool in meeting the shared goal of better building performance, sustainability and greater energy efficiency. But to be effective and workable, these systems - especially those paid for by American taxpayers - must be grounded in science and developed through true, voluntary consensus processes with full transparency, broad stakeholder input and due process. This is the only approach in a space as complex as green building that will ensure sustainable outcomes with real performance results.

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