

Comments and Context for LEED v5 Draft

INTRODUCTION

The new LEED v5 Draft is open for public comment through May 20 and consists of a total of four rating systems, including **Building Design + Construction (BD+C): [New Construction](#)** and **Core and Shell, Interior Design + Construction: [Commercial Interiors](#)**, and **Operations + Maintenance: [Existing Buildings](#)**.

It is critical, for the continued success and relevancy of the SFI standards, that comments are submitted by all organizations with a vested interest in them. The attached document prioritizes key comments to be submitted and provides context. Comments should reflect the key concepts shared using language that best aligns and reflects the sentiment of individual organizations. There are [two pathways for submitting comments](#). The [“Instructions How to Submit Comments” document](#) includes step-by-step instructions for submitting via the LEED Credit Library option. **The deadline for submitting comments is May 20, 2024.**

MAJOR CHANGES WITHIN LEED V5 DRAFT THAT IMPACT SFI AND FOREST CERTIFICATION

- There are no forest certification requirements for structural wood products, including mass timber and engineered wood products. Therefore, no points are attributed to forest certifications specific to structural wood products.
- Structural wood products now fall under the **Materials and Resources (MR) Credit: Reduce Embodied Carbon** ([starting on page 83 here](#)), a new credit.
- Non-structural wood products can earn points for SFI and FSC certification. However, FSC currently earns more points than SFI, and PEFC is not mentioned.
- LEED v5 is heavily focused on increased transparency and reducing embodied carbon emissions.
- The Innovation credit has substantially changed and is now [Project Priorities and Innovation](#), worth up to 10 points. This change is specifically designed to provide greater flexibility for projects to address their unique contexts and offer a nimble and responsive category that is able to adapt between the regularly scheduled LEED version updates. Therefore, as the market evolves, LEED has the ability to evolve with it using this credit category.

Key issues relevant for SFI-certified organizations

1. The omission of certifications to the SFI Forest Management Standard and SFI Chain of Custody Standard for structural wood products in LEED v5, particularly with the increased use of wood in mass timber, is negligent. This means a LEED Platinum (or any LEED certified) building could be built with wood procured from anywhere, any country, any species, lacking any sustainability oversight or forest management requirements whatsoever.
2. **MR Credit: Optimized Building Products Applies to Non-Structural Wood**
Included in rating systems: **Building Design + Construction (BD+C): [New Construction](#)** (p. 90) and **Core and Shell** (p. 96), and **Interior Design + Construction: [Commercial Interiors](#)** (p. 57)

The intent of this credit is to encourage the use of products and materials for which life-cycle information is available and that have environmentally, economically, and socially preferable

impacts. The credit intends to reward project teams for selecting products from manufacturers who have optimized their products across multiple impact areas.

This credit requires you to select nonstructural building products that achieve multiple optimization criteria across five impact areas: **climate health, human health, ecosystem health, social health and equity, and circular economy.**

Issues with this credit are that it awards more points to FSC than SFI (2.5 compared to 1.5), the certification language is incongruent between SFI and FSC, it fails to recognize PEFC, and only includes non-structural building products.

Recommended solutions for this credit include:

- All forest certifications receive equal points
- PEFC be included
- Nomenclature to be the same and read “FSC certified, SFI certified, and PEFC certified”
- Structural wood products (and all structural building products) be added to this credit – see *detailed justification below*

Figure 1. Optimized Product Valuation by Eligible Product Documentation

A	Optimized Product Impact Areas (Multi-Attribute Score)				
	B	C	D	E	F
Eligible Product Documentation	Climate Health	Human Health	Ecosystem Health	Social Health & Equity	Circular Economy
Multi-attribute Certifications					
Cradle to Cradle: Bronze	0.5	0.5	0.5	0.5	
Cradle to Cradle: Silver	0.5	1	1	0.5	0.5
Cradle to Cradle: Gold or Pt.	1	1	1	1	1
BIFMA e3 / level		0.5	0.5		
Living Product Challenge	1	1			
Living Product Challenge w/ MHI	1	2	1		
FSC Certified			1.5	1	
SFI Chain of Custody			1	0.5	
Reused materials			1		1

Comments to submit to USGBC for the MR Credit: Optimized Building Products:

1. **SFI and FSC certifications should earn equal points** for all impact areas. **PEFC should be added.**
2. FSC and SFI **language should be congruent.** Currently, the draft states, “FSC Certified and SFI Chain of Custody.” Proposed change “FSC, SFI, and PEFC Certified.”
3. SFI standards directly align with the AIA Materials Pledge Impact Area definitions:

- **Ecosystem Health** by preferring products that support and regenerate the natural air, water, and biological cycles of life through thoughtful supply chain management and restorative company practices. **Currently, FSC has 1.5 points and SFI 1. Recommended that equal points be awarded for SFI and FSC.**
 - The 2022 SFI Forest Management Standard requires forest management practices that yield ecosystem health, biodiversity, water, and climate benefits across a multitude of its requirements.
 - Prompt forest regeneration after harvest: Performance Measure (PM) 2.1. SFI-certified organizations shall promptly reforest after final harvest.
 - Maintenance of forest soils and stocks: PM 2.3. SFI-certified organizations shall implement practices that protect and maintain forest and soil productivity and soil health.
 - Avoidance of negative effects of biological agents: PM 2.4. SFI-certified organizations shall manage to protect forests from damaging agents, such as environmentally or economically undesirable levels of wildfire, pests, diseases, and invasive species, to maintain and improve long-term forest health, productivity, and economic viability.
 - Protection of water values: PM 3.2. SFI-certified organizations shall implement water, wetland, and riparian protection programs based on climate, soil type, terrain, vegetation, ecological function, harvesting system, best management practices (BMPs), provincial guidelines, and other applicable factors.
 - Enhancement of opportunities for carbon capture on forests that are owned or managed: PM 9.2. SFI-certified organizations shall have a program to identify and address opportunities for climate change mitigation associated with its forest operations.
 - Restore forest post-wildfire: PM 10.1 On the forests they own or manage, SFI-certified organizations shall limit susceptibility to undesirable impacts of wildfire, promote healthy and resilient forest conditions through management techniques, actions, and/or policies, and support restoration of forests following wildfire damage.
- **Social Health & Equity** by preferring products from manufacturers that secure human rights in their own operations and supply chains, organizations are positively impacting their workers and the communities where they operate. **Currently, FSC is 1 point and SFI 0.5. Recommended that equal points be awarded for SFI and FSC.**
 - The 2022 SFI Forest Management Standard requires SFI-certified organizations meet the intent of this impact under Objective 11. Legal and Regulatory Compliance, Performance Measures 11.1. and 11.2., as outlined by the following Indicators:
 - Written *policy* demonstrating a commitment to comply with social laws, such as those covering civil rights, equal employment opportunities, gender equality, diversity inclusion, anti-discrimination and anti-harassment measures, workers' compensation, *Indigenous Peoples'* rights, workers' and communities' right to know, prevailing wages, workers' right to organize, and occupational health and safety.

- *Forestry enterprises* will respect the rights of workers and labor representatives in a manner that encompasses the intent of the International Labor Organization (ILO) core conventions.
- The 2022 SFI Forest Management Standard requires SFI-certified organizations also meet the intent of this impact under Objective 8. Recognize and Respect Indigenous Peoples' Rights, Performance Measures 8.1, 8.2, and 8.3.
 - SFI-certified organizations must respect nation-to-nation relationships, ensuring that established legal, customary, and traditional rights frameworks are upheld. SFI-certified organizations are also required to recognize and respect Indigenous People's rights, confer with Indigenous Peoples whose rights may be affected by the SFI-certified organization's forest management practices, and respond to Indigenous Peoples whose rights may be affected by forest management practices on the SFI-certified organization's private lands.
- 4. **Structural building products should be included in this credit to optimize the intended results of this credit.** Structural wood products in particular, inherently have the potential to maximize the intent of this credit, and therefore, the exclusion of them substantially limits advancement of the desired impact areas.
- 5. **Specifically, the omission of structural wood products in this credit thwarts the advancement of its desired five impact areas – climate health, human health, ecosystem health, social health & equity, and circular economy, and therefore should be included.**

3. **EQ Credit: Green Cleaning Janitorial paper**

Included only in rating system **Operations + Maintenance: Existing Buildings** (page 56)

The intent of this credit is to foster a healthy building interior and site and reduce the potential negative impact of cleaning, disinfecting, and maintenance products and processes on cleaning personnel, building occupants, and the environment.

There are three options available to achieve this credit, with forest certifications applying to Option 3.

Issue with the credit is that it requires FSC certification only

Solution is to add SFI and PEFC certification

Comments to submit to USGBC for the Operations + Maintenance: Existing Buildings:

- All forest certifications, FSC, SFI, and PEFC, are currently accepted in LEED v4 and v4.1 and have been since 2016. In October 2019, SFI officially launched a two-year process for the SFI 2022 Standards Revision to include a new climate-smart forestry objective, a new fire resilience and awareness objective, conservation efforts, recognizing and respecting Indigenous Peoples' rights, logger training requirements in both the SFI Forest Management Standard and SFI Fiber Sourcing Standard, and a new due diligence system for the avoidance of controversial sources. The proposed LEED v5 language is reverting to pre-2016, with no justification supporting this change. **Therefore, SFI and PEFC certifications should be added to this credit.**

4. **MR Credit: Reduce Embodied Carbon**

Included in rating systems: **Building Design + Construction (BD+C): New Construction** (p. 83) and **Core and Shell** (p. 89).

The intent of this credit is to reduce embodied carbon of major structure, enclosure, hardscape materials and from construction processes on new construction and renovation projects.

Requirements of this credit reduce embodied carbon of major structure, enclosure, and hardscape materials. Projects comply with one or more of the Options below for points.

There are four options to receive points under this credit, with Option 3 being the one most relevant to SFI-certified organizations.

Option 1. Whole Building Life-Cycle Assessment (1-6 Points)

Option 2. Procurement of Low-Embodied Carbon Construction Materials (1-4 Points)

Option 3. EPD Analysis (Prescriptive) (1-5 Points)

Option 4: Track Carbon Emissions from Construction Activities (1-2 Points)

***NOTE:** this credit is designed to align with the intent of the [Federal Buy Clean Initiative](#) – a procurement policy to promote the purchase of construction materials and products with lower embodied greenhouse gas (GHG) emissions. They do this with heavy reliance on product-specific Environmental Product Declarations (EPDs). Currently, prioritized materials include cement/concrete, glass, asphalt, and steel.

Issue with the credit as written: EPDs and Source Disclosures alone do not ensure reduced carbon emissions; the intent of this credit and Source Disclosures lack universal understanding and framework. Finally, structural wood building products have zero forest management or chain of custody requirements.

Solution: Add requirements that address the intent of this credit by requiring forest certifications that specifically address the reduction of carbon emissions within their standards. Certifications provide assurances and proof points that align with the sustainability values of LEED and address the intent of this credit.

Table 3. GWP Limit Thresholds for Product Categories

Product Category	Source of Threshold	Tier 1	Tier 2	Tier 3
Non-Wood Products	GSA Thresholds*	Better than average	Top 40% thresholds	Top 20% thresholds
	Materials not on GSA list	Better than CLF Baseline	Better than EC3 "achievable"	N/A
Structural Wood Products	N/A	Facility-specific EPDs for >50% of total volume	Facility-specific EPD with source disclosure for >25% of total volume	N/A

See Table 4 below for corresponding points in each Tier level

Comments to Submit to USGBC on MR Credit: Reduce Embodied Carbon:

1. The omission of forest management and chain of custody certification requirements for structural wood products in LEED v5, particularly with the increased use of wood in mass timber, is negligent. This means a LEED Platinum (or any LEED certified) building could be built with wood procured from anywhere, any country, any species, lacking any sustainability oversight or forest management requirements whatsoever. Therefore, **a prerequisite that ensures all Structural Wood Products come from responsible sources should be added.** *(see chart below).*
2. The details around Source Disclosure are not widely understood and lack a commonly accepted definition, reporting mechanism, and verification system, and is an extremely nascent and emerging tool. There are too many gaps in the understanding and implementation of Source Disclosure to have it included within the mainstream Materials & Resources (MR) credit. Source Disclosure, and its initial use and testing, more accurately aligns with the intent of the [Project Priorities and Innovation](#) credit and therefore **it is recommended it be removed from the MR credit.**
3. EPDs and Source Disclosures alone fail to provide requirements, oversight, or assurances for responsible forest management practices yielding carbon emission reductions. Established forest management standards and certifications do just that. Specific to the intent of this credit (reducing embodied carbon), the 2022 SFI Forest Management Standard Objective 9 (Climate Smart Forestry), Performance Measure 9.2 requires SFI-certified organizations to identify and address opportunities to mitigate the effects associated with its forest operations on climate change. This requires developing a plan to identify and address greenhouse gas (GHG) emissions within their operational control. Measures taken to mitigate climate change associated with forest operations are required to be reported annually. This has a direct impact on global warming potential (GWP) in harvesting practices, which is the intent of this credit. Therefore, **SFI certification should be added to this credit and the changes reflected in Table 3** as follows *(include and reference the chart below):*
 1. **Tier 1:** Facility-specific EPD or certified sources for >20% of total volume
 2. **Tier 2:** Facility-specific EPD or certified sources for >40% of total volume

USGBC RECOGNIZES ALL CERTIFICATION STANDARDS FOR LEED POINTS			
PROGRAM NAME	Legal (non-controversial) Compliant?	Responsible Sources Compliant?	Certified Sources Compliant? (CoC)
Sustainable Forestry Initiative (SFI)			
• Forest Management (via SFI CoC certificate)	Yes	Yes	Yes
• SFI Fiber Sourcing certificate	Yes	Yes	No
American Tree Farm System (ATFS)			
• Forest Management (via SFI CoC certificate)	Yes	Yes	Yes
Canadian Standards Association (CSA)			
• Forest Management (via SFI CoC certificate)	Yes	Yes	Yes
Programme for the Endorsement of Forest Certification (PEFC)			
• Forest Management (via PEFC chain of custody certificate)	Yes	Yes	Yes
• PEFC Due Diligence System	Yes	No	No
Forest Stewardship Council (FSC)			
• Forest Management (via FSC chain of custody certificate)	Yes	Yes	Yes
• FSC Controlled Wood certificate	Yes	No	No