

LEED v5 Second Draft Comments to be Submitted by October 28, 2024

The second draft of LEED v5 was released September 27, 2024, with a comment period that closes on October 28, 2024, at 5 p.m. ET. The second draft (September 2024) of LEED v5 results from USGBC technical staff reviewing and considering over 6,000 comments received in the first comment period.

Below are the top three concerns from the first draft (May 2024) compared to how the second draft (September 2023) resolved our concerns in a positive way:

1. Structural Wood

- First draft (May 2024) - There was an omission of third-party forest certification for structural wood, which meant no credit was given to SFI, PEFC or FSC-certified wood and, therefore, no opportunity for certified wood to contribute points.
- Second draft (September 2024) - A new Project Priorities and Innovation Credit was created for structural wood that awards SFI, FSC, and PEFC equal points. So, the first draft (May 2024) went from no recognition of certified wood, to now recognizing SFI, FSC, and PEFC equally.

2. Non-Structural Wood

- First draft (May 2024) - FSC received more points than SFI within non-structural wood, and PEFC was not given any points.
- Second draft (September 2024) – SFI now receives equal recognition with FSC, and we were also successful in getting PEFC included in this credit with equal recognition.

3. Janitorial Paper

- First draft (May 2024) - FSC was the only forest certification standard recognized for janitorial paper under Green Cleaning for Existing Buildings.
- Second draft (September 2024) – SFI is now recognized equally with FSC for janitorial paper.

In summary, SFI has been added to all relevant areas in this second draft (September 2024) and now receives equal weight as FSC. SFI was also successful in getting PEFC included for structural and non-structural wood.

That said, these suggested comments below are still critical as they reinforce the positive inclusion of SFI and offer additional opportunities to further advance the intent of the associated LEED credit, further advance the value of all forest certifications in general, and/or clarify existing language. Moreover, it is very likely that those with FSC preferences will be weighing in heavily against the current inclusive approach, so it is important to have many positive voices praising USGBC for recognizing all forest certification standards equally (SFI, PEFC and FSC).

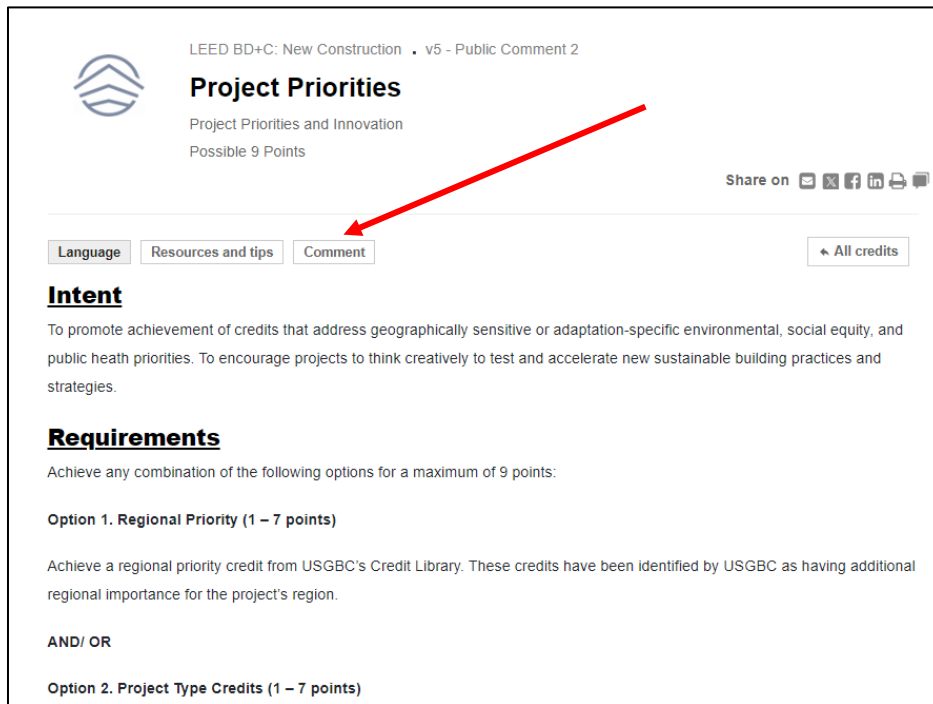
1. **Structural Wood - Project Priorities and Innovation Credit:**

For reference, our comments during the first comment period (May 2024) relevant to structural wood were associated with the **Materials and Resources (MR): Reduce Embodied Carbon** credit. While the second draft (September 2024) of LEED v5 does not award points for SFI, FSC, or PEFC in the main body of the credit. Instead, the second draft (2024) awards points for SFI, FSC, and PEFC structural wood through a [Project Priorities and Innovation credit](#). This new pilot credit is called "[Responsible Sourcing of Structural Materials](#)" and is located under the pilot credit library.

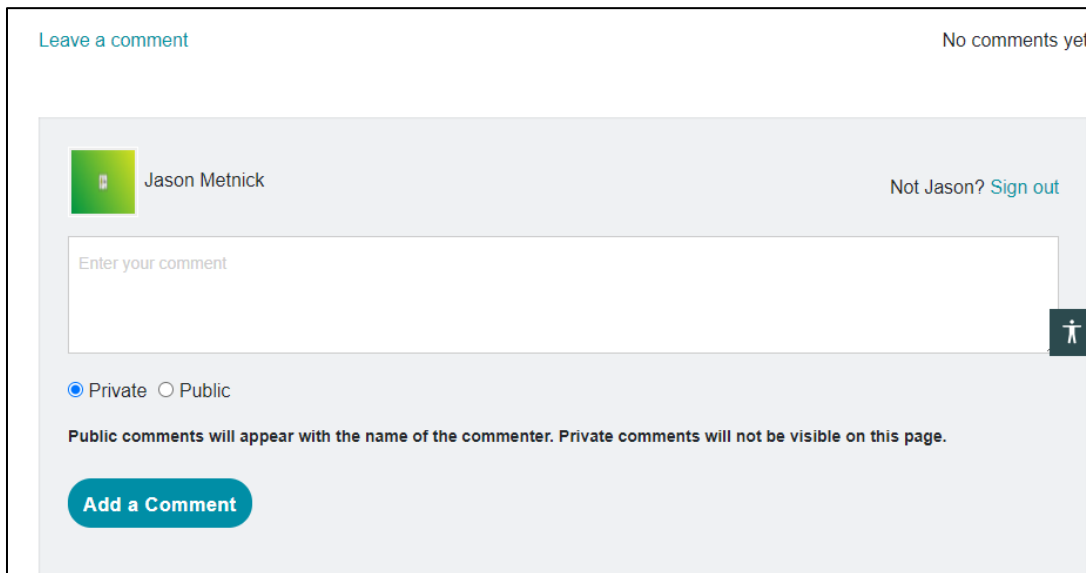
While we are pleased and supportive to see SFI listed in the Project Priorities and Innovation credit, we are also submitting comments for SFI to be included in the Reduce Embodied Carbon credit. We believe language should exist in the main body of LEED and feel the most appropriate location is in the [Materials and Resources \(MR\): Reduce Embodied Carbon](#) credit.

How to Submit Comments for Project Priorities and Innovation Credit:

[Go to this link](#) and then click the "comment box." Note, if you don't have a user account, you'll need to create one. If you already submitted comments in the past, you can use the same user account as before.



Once you click “comments” and sign in, a new box will appear like below. Here you can add your comments. You have the option for comments to be private or public.



Below are the suggested comments to submit for the Project Priorities and Innovation Credit:

- We applaud the addition and equity of third-party forest certification for structural wood within the [Project Priorities](#) credit. Rewarding projects that source SFI, FSC, and/or PEFC certified wood helps ensure positive outcomes relevant to carbon, biodiversity, water, fire resiliency, as well as ensure legality and the assurance of avoiding deforestation and forest degradation in the supply chain. This is critical with the growth of mass timber and structural wood in buildings.
- Additionally, the value of well-established, independent third-party certifications exceeds the definition of a pilot credit and warrants specific language within the main body of the LEED. To better align structural wood with that of non-structural wood, which encourages the use of products and materials with environmentally, economically, and socially preferable impacts, we recommend that SFI, FSC, and/or PEFC certification be moved to a stand-alone credit under [Reduced Embodied Carbon](#).

Requirements within the SFI 2022 Forest Management Standard specifically address the reduction of carbon emissions within forest operations, and directly meet the intent of the Reduce Embodied Carbon credit. Specifically, The SFI 2022 Forest Management Standard has an Objective dedicated to Climate Smart Forestry. The Objective requires SFI-certified organizations to ensure forest management activities address climate change adaptation and mitigation measures. This means SFI-certified organizations are required to identify and address climate change risks to forests and forest operations. SFI-certified organizations are also required to develop adaptation objectives and strategies to address priority climate change risks. Finally, SFI-certified organizations are required to identify and address mitigation opportunities in forest operations. All of which are third-party audited.

Therefore, we suggest adding an **"AND/OR Option 5. Forest Certification – Reduced Embodied Carbon (1 point)"**. Requirements within the SFI 2022 Forest Management Standard specifically result in the reduction of carbon emissions from forestry operations which in turn directly results in lower embodied carbon for wood products sourced from those forestlands. This directly achieves the intent of this credit.

2. Non-Structural Wood - Building Product Disclosure and Optimization:

For reference, our comments during the first comment period (May 2024) relevant to non-structural wood were focused on the fact that FSC was awarded more recognition than SFI, and PEFC was not mentioned at all. This new draft (September 2024), based on our comments and submissions, now recognizes SFI, FSC and PEFC equally.

The intent of the [Building Product Disclosure and Optimization](#) credit is to encourage the use of products and materials that have sustainability information available and that have environmentally, economically, and socially preferable impacts in alignment with industry momentum. Achievement is demonstrated through eligible compliant manufacturer product documentation, which includes third-party product certifications, ecolabels, declarations, and standards.

The following [resource guide](#) is part of this credit to show the various categories for how to determine if a product meets one of five achievement levels.

- Climate health
- Human health
- Ecosystem health
- Social health and equity
- Circular economy

Note, SFI certified non-structural wood qualifies as Level 2 under Ecosystem Health and Level 1 under Social Health and Equity.

There are two ways to earn points in this credit.

- Option 1 - Select products with multi-attributes from a diverse range of unique manufacturers. Note, SFI certified non-structural wood qualifies as a multi-attribute building material.
 - If there are more than 15 different manufacturers with multi-attribute non-structural building products, then 1 point is awarded.
 - If there are more than 30 different manufacturers, 2 points are awarded
 - If there are more than 45 different manufacturers, 3 points are awarded
- Option 2 - Rewards the selection of eligible interior and enclosure materials from the following product categories:
 - Paints and coatings
 - Adhesives and sealants
 - Flooring
 - Walls
 - Ceilings
 - Insulation

- Furniture
- Composite Wood
- Plumbing fixtures

Below is an example of how SFI certified products contribute to earning points under Option 2. Product Categories (in this version of v5) under the Building Product Disclosure and Optimization credit described in [Equation 1. Calculate the multi-attribute value of a product category:](#)

- Let's say the product category is flooring with a total value of \$50,000.
- SFI certified flooring currently earns a score of 3 as shown within [Table 2. "Product Documentation Multi-Attribute Scoring"](#) row "Wood: Responsibly Sourced (legal and verified)" (2 points for Ecosystem Health + 1 point for Social Health & Equity).
- If the total value of SFI flooring is \$10,000 (call it "Product A" in the above Equation example), we can multiply the \$10,000 by 3 so now the adjusted value for that SFI certified flooring is \$30,000.
- Then if Product B (still within the same category of flooring) is PEFC with a value of \$10,000, that too can be multiplied by 3 for a new adjusted value of \$30,000.
- Adding the two new adjusted values together equals \$60,000 (the numerator) which exceeds 100% of the total product category (flooring) value of \$50,000. Therefore, the flooring category earns 1 point under this credit (as per Table 2 below).

The same calculations can be done for a second product category, certified furniture. Assuming the same numbers as above in the flooring example, we now have 2 product categories exceeding 100% value and earn 2 points within this credit.

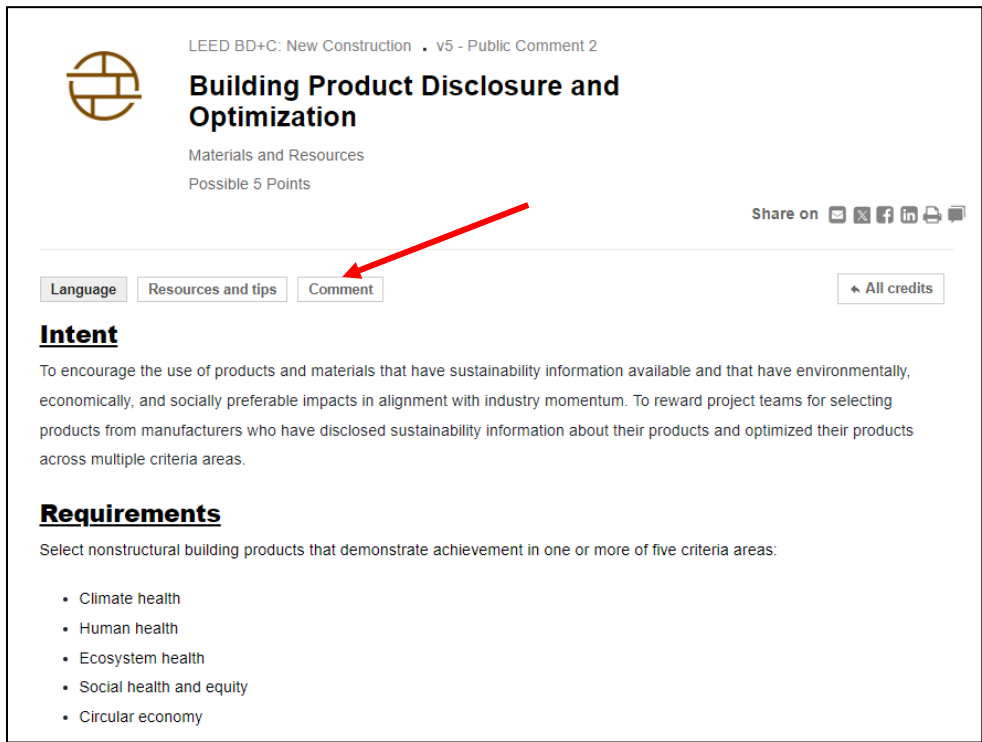
The same can be calculated throughout product categories listed above.

Table 2. Points for multi-attribute achievement of product categories

Number of product categories	Points
1 Product Category	1
2 Product Categories	2
3 Product Categories	3
4 Product Categories	4
5 Product Categories	5

How to Submit Comments for Building Product Disclosure and Optimization:

[Go to this link](#) and click the “comment box.” Note, if you don’t have a user account, you’ll need to create one. If you already submitted comments in the past, you can use the same user account as before.



Once you click “comments” and sign in, a new box will appear like below. Here you can add your comments. You have the option for comments to be private or public.



Below are the suggested comments to submit for Building Product Disclosure and Optimization:

- We support the recognition of SFI certified wood in Table 1 of the “Additional Resources for MR Credit: Building Product Disclosure and Optimization,” and applauds the specific SFI reference in Level 2 for Ecosystem Health.
- SFI should also be specifically referenced for Level 1 under Social Health and Equity under Table 1 of the [Additional Resources for MR Credit: Building Product Disclosure and Optimization](#). The current language

says, "Disclosure and verification of supply chain worker protections following ILO Conventions. Qualifying products demonstrate that the product was manufactured by a company that meets all 8 Fundamental Conventions of the International Labour Organization (ILO) and be third party certified. "

The SFI standards require SFI-certified organizations to comply with all applicable social laws at the federal, provincial, state, and local levels. Examples of social laws include civil rights, equal employment opportunities, gender equality, diversity, inclusion, anti-discrimination and antiharassment measures, workers' compensation, Indigenous Peoples' rights, workers' and communities' right to know, prevailing wages, workers' right to organize, and occupational health and safety. SFI-certified organizations must also respect the rights of workers and labor representatives in a manner that meets the spirit and intent of the International Labour Organization (ILO).

SFI Standards also require certified organizations to assess and mitigate any risk associated with sourcing fiber from controversial sources including forest activities where the ILO Declaration on Fundamental Principles and Rights at work (1998) are not met.

Organizations certified to the SFI Standards are required to undergo annual audits by independent and accredited certification bodies to deliver ongoing conformance against these requirements. Third-party independent certification is critical to verify that requirements set out in the SFI standards and supporting documents are met.

- SFI should also receive Climate Health Level 1 designation under Table 1 of the [Additional Resources for MR Credit: Building Product Disclosure and Optimization](#). The SFI 2022 Forest Management Standard specifically addresses the reduction of carbon emissions within forest operations, and directly meets the intent to reduce embodied carbon and climate impacts.

Specifically, The SFI 2022 Forest Management Standard has an Objective dedicated to Climate Smart Forestry. The Objective requires SFI-certified organizations to ensure forest management activities address climate change adaptation and mitigation measures. This means SFI-certified organizations are required to identify and address climate change risks to forests and forest operations. SFI-certified organizations are also required to develop adaptation objectives and strategies to address priority climate change risks. Finally, SFI-certified organizations are required to identify and address mitigation opportunities in forest operations. These requirements are audited.

- USGBC should insert a new row in "Table 2 of the Additional Resources" for "Wood: SFI, FSC, PEFC Chain of Custody Certification"

If USGBC determines that SFI should also receive a Level 1 designation for Climate Health, please ensure this is reflected in the Table 2 chart within this new row.

3. Janitorial Paper - Environmental Quality (EQ): Green Cleaning:

For reference, our comments during the first comment period (May 2024) relevant to janitorial paper were focused on the fact that FSC was the only forest certification program recognized for points. This new draft (September 2024) now recognizes SFI and FSC equally.

How to Submit Comments:

[Go to this link](#) and click the "Comment box." Note, if you don't have a user account, you'll need to create one. If you already submitted comments in the past, you can use the same user account as before.

LEED O+M: Existing Buildings . v5 - Public Comment 2

Green Cleaning
Indoor Environmental Quality
Possible 2 Points

Share on

Language Resources and tips **Comment** All credits

Intent
To foster a healthy building interior and site, and to reduce the potential negative impact of cleaning, disinfecting and maintenance products and processes on the cleaning personnel, building occupants, and the environment.

Requirements
Option 1. Certified Cleaning Service (1 point)
Clean the project with a cleaning service certified and in good standing under one of the following:

- Green Seal's Environmental Standard for Commercial Cleaning Services (GS-42).
- International Sanitary Supply Association (ISSA) Cleaning Industry Management Standard for Green Buildings (CIMS-GB) Local equivalent for projects outside the U.S.

Once you click “comments” and sign in, a new box will appear like below. Here you can add your comments. You have the option for comments to be private or public.

Leave a comment No comments yet

Jason Metnick Not Jason? [Sign out](#)

Enter your comment

Private Public

Public comments will appear with the name of the commenter. Private comments will not be visible on this page.

Add a Comment

Below are the suggested comments to submit for Environmental Quality (EQ): Green Cleaning:

We applaud the addition of SFI chain of custody certification for janitorial paper in the Green Cleaning credit. Rewarding SFI certified janitorial paper products demonstrates that USGBC is ensuring positive outcomes relevant to carbon, biodiversity, water, fire resiliency, as well as ensure legality and the assurance of avoiding deforestation and forest degradation in the supply chain.

For greater clarity, congruent language should be used. The language currently reads: “FSC certification (FSC 100% or FSC Recycled), or SFI Chain of Custody certification.”

This should be edited to read, FSC, SFI, or PEFC certification.