



The North American Coalition On Green Building

Who We Are: The North American Coalition on Green Building consists of 32 organizations with a material interest in the green building movement. The coalition was created in 2003 to work with all interested parties to promote green building concepts and standards that reflect the views and concerns of all stakeholders.

We Support Green Building, but We do Not Support USGBC's LEED™ System as Currently Developed and Implemented: All members of the Coalition share the overarching goal of building more sustainable buildings. Members of the coalition are committed to reducing the environmental impact of buildings and support scientifically justified systems and standards to reduce environmental impacts. **However, for the reasons below, governments should not rely on the United States Green Building Council's (USGBC) Leadership in Energy and Environmental Design (LEED)™ rating system as a system to ensure green buildings.**

Green Building Rating Standards Should be Developed Through an Accredited Standards Development Organization: The Coalition supports a nationally- recognized voluntary consensus processes for the development of green building standards and greater use of lifecycle analysis in the establishment of these standards. A consensus process is open to all interested parties, not just to selected categories of organizations that are allowed to join the entity creating the rating system or standard. A consensus process provides transparency, ensures meaningful opportunities for participation by groups that will be affected by the standard, and has procedures to ensure balance, consideration of dissenting views, and appeals procedures. Collectively, these procedural safeguards ensure one group does not dominate the process to the detriment of others. The American National Standards Institute (ANSI) is the coordinator of the U.S. standards process and provides strict objective requirements for accreditation of those processes. Further guidance on basic elements of a consensus process is available from the U.S. Government's Office of Management and Budget in Circular A-119.

Green Building Rating Systems or Standards Should be Based on Objective Scientific Criteria, Including Consideration of Life Cycle Impacts: Without a grounding in objective, scientific criteria based on life cycle impacts, a rating system or standard is more likely to reflect the subjective biases of those who have crafted or are implementing the program. Objective criteria help ensure that the rating system or standard will not yield inconsistent results, arbitrary thresholds, an emphasis on cost rather than environmental impact measures, a lack of appropriate baselines and measures of improvement, and an inability to compare buildings in different locations on equal terms. These discrepancies can undermine the goals of the green building program as a whole.

Conclusion: U.S. government experts have indicated that the USGBC process to develop LEED™ is neither consensus-based nor grounded in objective, scientific criteria with appropriate consideration of life cycle impacts. Therefore, as currently developed and implemented, LEED™ should not be used by governments to ensure green buildings. However, with some substantive and procedural changes, the LEED™ rating system could achieve its stated goal of improving the environmental performance of the entire building industry. The North American Coalition on Green Building stands ready to work with USGBC and all interested parties to help achieve those goals.

APA-The Engineered Wood Association
 The Adhesive and Sealant Council
 Alliance for the Polyurethanes Industry
 The American Architectural Manufacturers Association
 American Forest Foundation
 American Forest & Paper Association
 American Plastics Council
 Appalachian Hardwood Manufacturers, Inc.
 Architectural Woodwork Institute
 BOMA International
 Canadian Lumbermen's Association
 Canadian Kitchen Cabinet Association
 Canadian Plastics Industry Association
 Canadian Wood Council
 Composite Panel Association
 Forest Products Association of Canada
 General Electric Company
 Hardwood Plywood and Veneer Association
 International Wood Products Association
 Kitchen Cabinet Manufacturers Association
 National Hardwood Lumber Association
 National Lumber & Building Material Dealers Association
 National Paint & Coatings Association
 North American Wholesale Lumber Association
 Plastic Pipe and Fittings Association
 Resilient Floor Covering Institute
 Structural Board Association
 The Spray Polyurethane Foam Alliance
 TECO
 The Treated Wood Council
 Vinyl Council of Canada
 Vinyl Institute
 Window and Door Manufacturers Association
 Wood Promotion Network