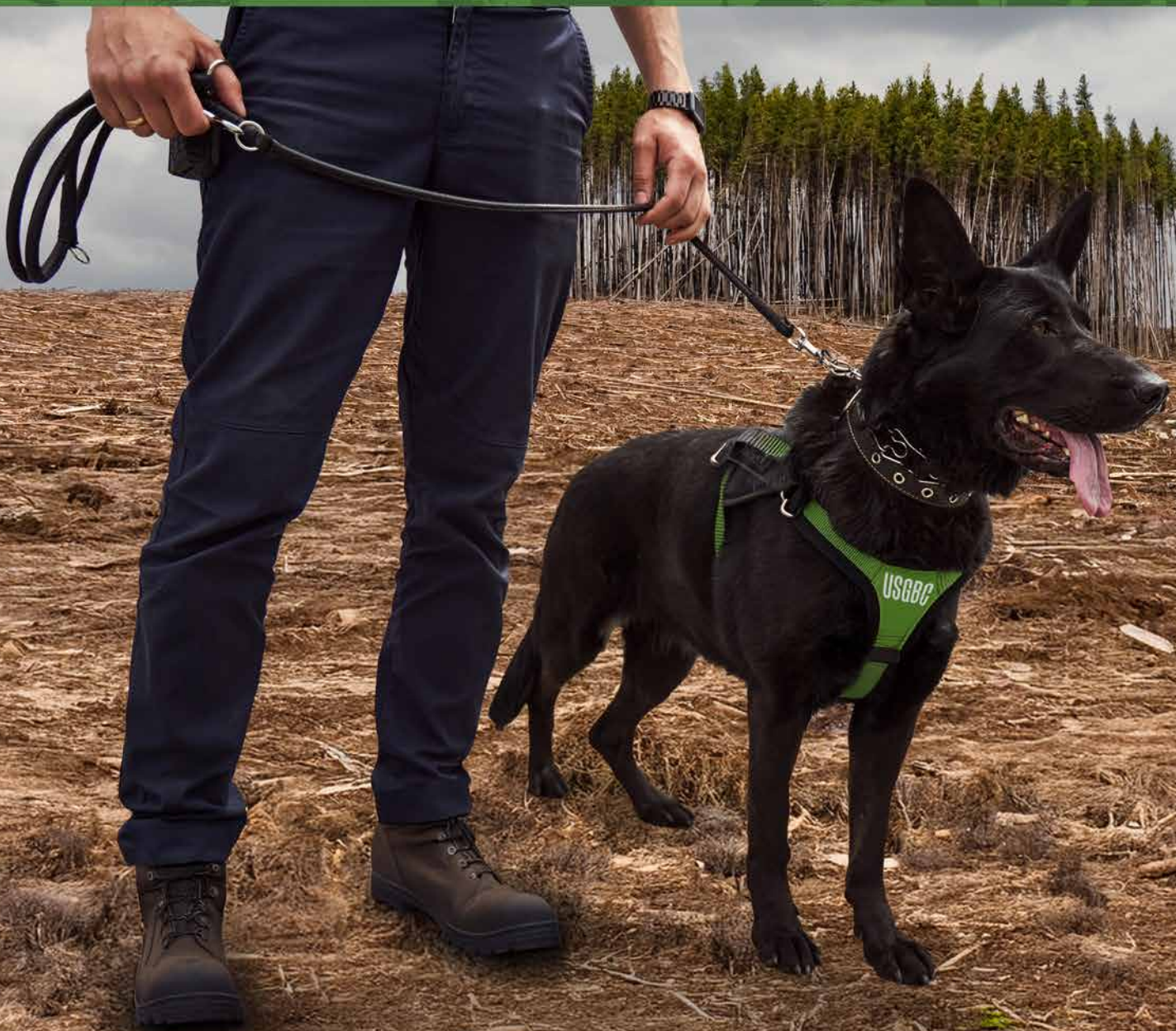


HAS **BIG TIMBER** FINALLY BROUGHT **USGBC TO HEEL?**



THE US GREEN BUILDING COUNCIL STARTED WITH THE LOFTY AMBITION THAT ITS LEED GREEN BUILDING RATING SYSTEM **WOULD DRIVE MARKET TRANSFORMATION TO SUSTAINABILITY.**

The first version of LEED rewarded the use of wood sourced from forests managed to high environmental and social standards relative to conventional industrial forestry practices near or at the regulatory floor. How is it, then, that in 2024 USGBC is proposing to credit wood that is *“documented to come from legal sources?”*

A photograph of a chainsaw lying on a tree stump in a forest. The chainsaw is positioned horizontally, with its handle on the left and the cutting bar extending to the right. The background shows a dense forest with trees and foliage. The image is overlaid with a semi-transparent green filter.

HOW DID WE GET FROM **LEADERSHIP** TO **MERELY LEGAL?**

¹ <https://www.usgbc.org/resources/additional-resources-v5-mr-credit-building-product-disclosure-and-optimization-pc2>

CONSIDER THE HISTORY:

1994

Environmental groups, forward-thinking companies, and social interest groups concerned about the destruction of the world's forests come together to form the **Forest Stewardship Council** (FSC). FSC's goal was and is to promote environmentally and socially responsible forest management practices globally. FSC's governance system is organized into three chambers with equal power – an environmental chamber concerned with protecting forest ecosystems, an economic chamber concerned with making a profit from forest products, and a social chamber concerned with human and worker rights.

Galvanized by this new organization that gives environmentalists and social advocates a say in how forests should be managed, major North American timber companies, under the umbrella of their trade association, the **American Forest and Paper Association** (AF&PA), move quickly to form their own system, calling it the **Sustainable Forestry Initiative** (SFI). SFI essentially enshrines big timber's status quo, certifying as "sustainable" logging operations that do little more than meet regulatory requirements. Its basic purpose was and is to defend the practice of industrial forestry—including large-scale clearcutting and chemically-intensive tree-farming—which underpins the profits of giant timber companies. These practices may be an efficient way to produce timber but too often do so at the expense of forest ecological health, biological diversity, soil and water quality, and the well-being of local communities.



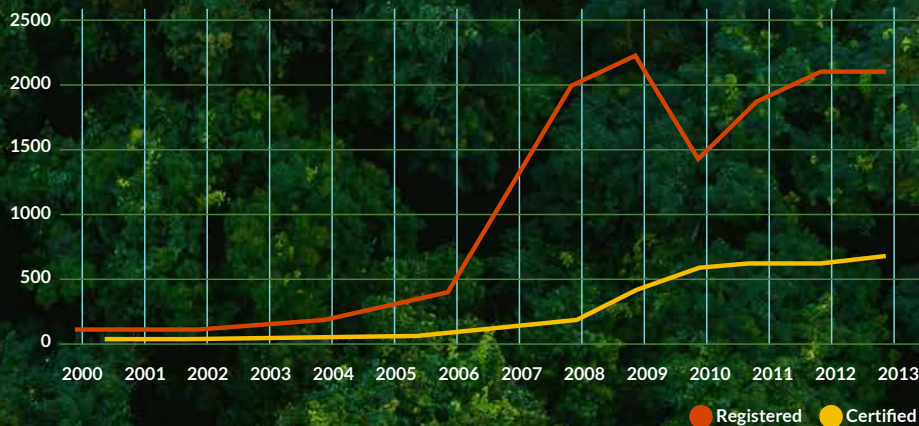
THE HISTORY:

2000

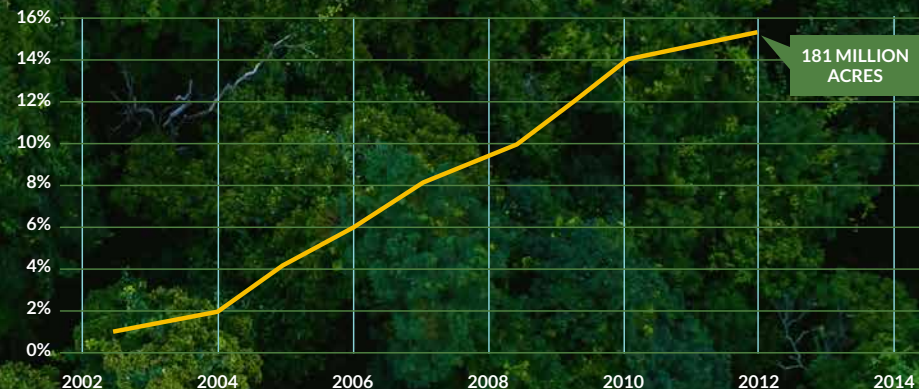
The green building movement takes a leap forward. US Green Building Council (USGBC), which had been founded seven years earlier, releases the first version of the LEED (Leadership in Energy and Environmental Design) green building rating system. A basic concept of LEED is to award credit for using products or practices that meet the highest standards that already exist in the marketplace and credibly address various facets of green building.

Several Materials & Resources credits within LEED address the environmental impacts of sourcing and manufacturing building materials, while other credits encourage recycling and reuse. One such credit rewards the products of responsible forestry, and in 2000 USGBC chooses FSC as the reference standard.

Growth of LEED Rating System in Millions of Square Feet



FSC Growth in North America in Percentage of Working Forests



THE HISTORY:

2000
–
2010

LEED catches fire among building owners and design professionals, becoming a focal point for green building practice and a template for other building rating systems around the world. As LEED users become accustomed to the credits, architects and designers use the rating system as a check list of green building strategies – not only for LEED projects, but for all projects. In the forest sector, LEED’s rapid growth creates strong market demand for FSC-certified wood products, and in turn helps drive a dramatic growth in the acreage of North American forest certified to FSC’s higher standards.

Big timber companies and their trade associations track LEED and FSC’s growth trajectories with consternation. They waste little time in mounting a pressure campaign to get USGBC to recognize SFI and other industry-supported forest certification schemes, arguing that they are equivalent with FSC.

“[THIS IS] MORE THAN A MOVEMENT – IT’S HUMANITY’S IMMUNE RESPONSE TO THE DESPOLIATION OF THE ENVIRONMENT, THE DEGRADATION OF LIVING SYSTEMS, THE CORRUPTION WE SEE IN ECONOMIC SYSTEMS, AND THE POLLUTION BY THE INDUSTRIAL SYSTEM.”

– PAUL HAWKEN

From A Fierce Green Fire: The Battle for a Living Planet

THE HISTORY:

2010
–
2011

In 2010, At SFI's behest, 79 members of the House of Representatives from 35 states sign a letter to USGBC, saying that they should "accept all credible forest management certification systems for qualification under the LEED rating system." Seven governors send similar letters, bringing the total to 12 governors, counting similar letters from 2008-2009.

And in 2011, Maine becomes the first of several states to prohibit the use of LEED for state projects by stipulating that only green building rating systems that treat all forest certification systems as equivalent can be used for government construction. This effectively bans LEED because of its exclusive recognition of FSC and ratchets up the pressure to accept SFI.



2013

After numerous drafts and years of heated debate, USGBC members ratify a major update to the LEED rating system, LEED v4, that continues to recognize FSC-certified wood and does not recognize SFI – and the timber industry's lobbying of USGBC continues.

THE HISTORY:

2016

At last the timber industry falls quiet as USGBC succumbs and lets SFI in a side door, releasing a “Legal Wood” pilot credit that includes an “Alternative Compliance Path” which, via an **obscure ASTM standard created by timber industry representatives,** recognizes all forest certification systems, including SFI and the Programme for the Endorsement of Forest Certification (PEFC) along with FSC. In fact, in a subtle and circuitous way, it even advantages SFI—this in spite of the fact that **SFI has a history of certifying companies guilty of serious legal violations.**

Within 24 hours of USGBC’s announcement of the pilot credit, AF&PA releases this statement: *“USGBC has decided to treat all credible forest management certification systems as equally acceptable... AF&PA has worked on this issue for many years; it is encouraging to see USGBC open its standard to recognize all credible certification systems, in alignment with our policy.”* And within a week, SFI announces a new webinar “explaining” the pilot credit and posts a factsheet to its website entitled “How to Count Your Certified Wood for a LEED Point.”



THE HISTORY:

SPRING
2024

USGBC opens the first round of public comment on the first draft of LEED v5, introducing a new Materials & Resources credit for Optimized Building Products. It proposes, for the first time, recognition of SFI in the mainframe of the LEED rating system. However, FSC receives greater weighting.



SFI-certified steep-slope logging, Washington State Photo courtesy of Peter Goldman, Esq.

FALL
2024

A second draft of LEED v5 for New Construction is put forward for another round of public comment. In this version, certified wood has been removed from the main document and instead is addressed in a companion document entitled “Additional Resources for MR Credit: Building Product Disclosure and Optimization” as well as a proposed Project Priority and Innovation Credit.

The companion document describes three achievement levels for various Criteria Areas for Product Evaluation (Climate Health, Human Health, Ecosystem Health, Social Health & Equity, Circular Economy):

- **Level 1:** A product in this level achieves a first step towards sustainability for a criteria area
- **Level 2:** This level represents a *leadership position* in the marketplace for a given sustainability attribute. *Products at this level are optimized and demonstrate a level of sustainability that peers aspire to achieve* [our emphasis]
- **Level 3:** Products that earn this level are elite and represent the forefront of sustainability

THE HISTORY:

FALL
2024
CON'T.

Wood qualifies as follows under the Ecosystem Health Criteria Area:

- **Level 1:** *“For wood products, criteria include public disclosure of the source of the wood, which includes both the location and ownership type of the source forest...”*
- **Level 2:** *“For wood products, optimization means a product is documented to come from legal sources. Achievement of legality is demonstrated by selecting wood products that are certified by PEFC, SFI, or FSC...”*
- **Level 3** contains only the word “Reserved” (but for what?)

The language in the Project Priority and Innovation Credit mirrors Level 2 above.

The second draft of LEED for Operations & Maintenance for Existing Buildings also lets SFI in the door, with a Green Cleaning credit that, for the first time, recognizes the use of SFI certified janitorial paper alongside and equivalent to FSC.

SFI breaks out the champagne: an **email** goes out to SFI-certified organizations crowing that though, in the first draft, *“FSC received more recognition than SFI, and PEFC was not recognized,”* in the second draft *“SFI now receives equal recognition with FSC, and we were also successful in getting PEFC included in this credit with equal recognition.”* It closes by stating: *“In summary, SFI has been added to all relevant areas in this second draft...and now receives equal weight as FSC. SFI was also successful in getting PEFC included for structural and non-structural wood.”* It goes on to advise SFI’s certificate holders and allies that ...

“...suggested comments are critical to submit as they reinforce the positive inclusion of SFI ...Moreover, it is very likely that those with FSC preferences will weigh 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).”

WELL, THEY ARE RIGHT ABOUT THAT MUCH.

THE CASE FOR FSC

Numerous academic papers² and [independent reporting](#) from respected outlets like *BuildingGreen* point to the fact that FSC is more rigorous than SFI. [SFI remains deficient in many critical areas, including protection of old growth and other high conservation values, Indigenous Peoples' rights, and prohibiting conversion of natural forests to plantations.](#) And the proposition that wood that is merely legal occupies a “leadership position in the marketplace” and demonstrates “a level of sustainability that peers aspire to achieve” is laughable; as with the Legal Wood Alternative Compliance Path, legality is simply being used as a pretext to let SFI in.

In late November 2024, [BuildingGreen released an article](#) comparing FSC, PEFC and SFI. Not only do they analyze their forest management standards, they also examine governance, funding, how the systems deal with non-certified materials used in mixing, etc.



BuildingGreen's top-line procurement recommendations for forest products include:

- When sourcing wood products, prefer reclaimed or salvaged materials
- Require Forest Stewardship Council (FSC) certification for wood and other forest products
- *Do not rely on the Programme for the Endorsement of Forest Certification (PEFC), including any of the Sustainable Forestry Initiative (SFI) programs, as an alternative to FSC*

² E.g.:

Gutierrez Garzon, A. R. et al. (2020). A Comparative Analysis of Five Forest Certification Programs. *Forests*, 11(8), 863

Judge-Lord, D. et al. (2020). Do Private Regulations Ratchet Up? How to Distinguish Types of Regulatory Stringency and Patterns of Change. *Organization & Environment*, 33(1), 96–125

Diaz, D. et al. (2018) Tradeoffs in Timber, Carbon, and Cash Flow under Alternative Management Systems for Douglas-Fir in the Pacific Northwest. *Forests*, 9(8), 447

CONCLUSION

ONCE AGAIN, **USGBC STANDS AT A CROSSROADS**: WILL THE LEADERSHIP STANDARD IN GREEN BUILDING STAND FIRM IN PROMOTING THE LEADERSHIP STANDARD IN FORESTRY AND FOREST PRODUCTS? **OR WILL TWO DECADES OF TIMBER INDUSTRY LOBBYING FINALLY BRING USGBC TO HEEL?**

WE CAN ONLY HOPE THAT SCIENCE AND CONSCIENCE WILL PREVAIL OVER GREENWASHING AND VESTED INTEREST, AND THAT THOSE COMMITTED TO A GREEN BUILDING MOVEMENT THAT DRIVES FOREST STEWARDSHIP WILL STAND UP AND LET THEIR VOICES BE HEARD.



TAKE ACTION:
TELL USGBC
TO MAINTAIN
**HIGH STANDARDS
FOR WOOD &
FORESTS**

LEARN MORE

<https://www.sierraclub.org/forests/don-t-buy-new-sfi>



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