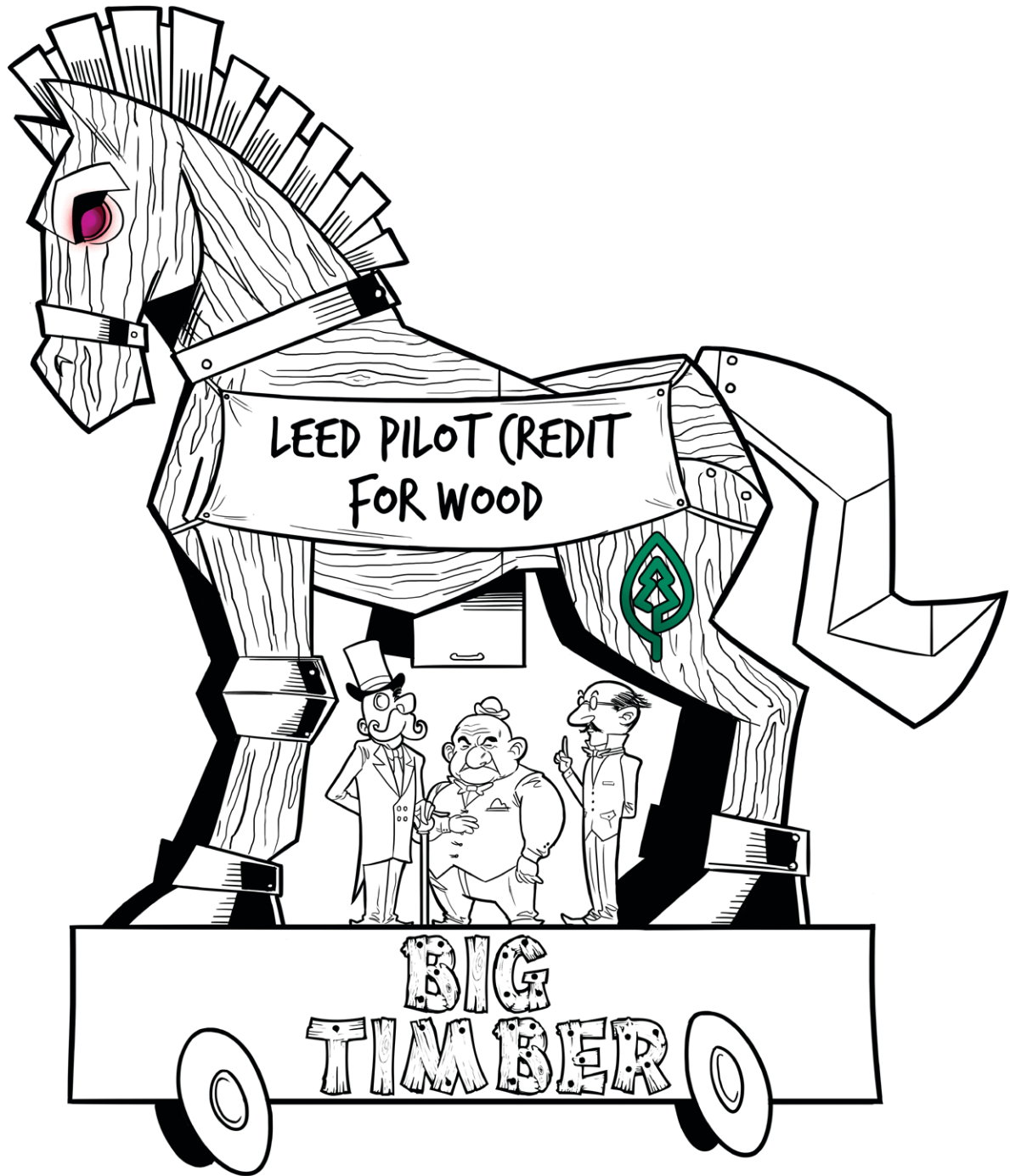


A TROJAN HORSE FOR BIG TIMBER

REFERENCE STANDARD USED BY LEED PILOT CREDIT PROMOTES THE AGENDA OF THE CONVENTIONAL LOGGING INDUSTRY



THE NEW LEED PILOT CREDIT FOR WOOD—the “Legal Wood” [Alternative Compliance Path \(ACP\)](#)—is fatally flawed because of the biased and untested ASTM standard it rests on.

The development of this ASTM standard (ASTM D7612-10) was driven by timber industry representatives without the participation of environmental groups or of the sustainable design community. The ACP requires that 70% of the wood used in a project meet the standard’s definition of “Responsible Sources”—a designation that covers all timber from North America regardless of whether or not forests were managed in a truly responsible manner. The standard establishes all forest certification systems as equivalent when in fact they are not. Also, while it contains provisions for legal wood, the language is so vague that project teams are left to guess as to how to comply.

As things stand, the ACP is not simply a pilot for how to keep illegal wood out of LEED projects as USGBC maintains. It’s a Trojan horse constructed by and for Big Timber.

USGBC needs to move as quickly as possible to replace the current ACP with [a well-conceived pilot credit with clear procedures and documentation requirements for reducing the risk of using illegal wood that project teams can readily interpret and test.](#)

A REFERENCE STANDARD RIGGED BY BIG TIMBER

ASTM D7612-10 is the reference standard for USGBC’s controversial [Alternative Compliance Path \(ACP\)](#) for the Materials & Resources credits in LEED 2009 and LEEDv4 that recognize certified wood. This standard was written by and for the conventional timber industry and its pet forest certification system, the Sustainable Forestry Initiative (SFI).

One major problem with ASTM D7612-10 and the ACP that rests on it is a newly minted classification of wood products as being from “Responsible Sources.” This designation is tailored to promote SFI—and more specifically its Fiber Sourcing Standard and label.



The ACP reads as follows:

Wood products from Certified Sources as defined by ASTM D7612-10 are valued at 100% of their cost for purposes of credit achievement calculation if the following two conditions are also met:

- 100% of all wood is verified to be from Legal (non-controversial) Sources as defined by ASTM D7612-10.

AND

- **70% (based on cost) of all wood used on the project is from Responsible Sources as defined by ASTM D7612-10** [our emphasis].

And here is ASTM D7612-10's definition of "Responsible Sources:"

*Section 6.1.2.1 Products from responsible sources are produced with wood fiber acquired according to an **independently certified procurement standard** or from jurisdictions with regulatory or quasi-regulatory programs to implement best management practices... **To qualify for this category, the applicable standard or forest governance in the applicable geography shall document a system designed to require compliance with best management practices to protect water quality...*** [our emphasis]

Confused as to what this means? **We were too until we figured out that currently only SFI is structured to document such a system.** More specifically, as things stand today, only companies certified to SFI's Fiber Sourcing Standard meet this definition.

NOT LONG AFTER USGBC released its ACP, SFI published [a guide on how SFI products qualify](#) under it. A [table](#) explains that an SFI Fiber Sourcing certificate is "Responsible Sources Compliant" while an FSC Controlled Wood certificate is not.

Also, in the spring of 2016, Weyerhaeuser's VP of Sustainable Forestry pitched ASTM D7612-10 as the basis for revisions to wood-related language in the ASHRAE 189.1 Standard for the Design of High-Performance Green Buildings. [Her presentation](#) provided an insider's perspective on the process by which ASTM D7612-10 was developed. Ironically, one slide claims that ASTM D7612-10 is a "meta standard" or "roadmap" that is "brand-neutral, to avoid competition issues"—and yet, another slide notes that the ASTM standard's definition of Responsible

Sources only comprises "SFI's certified sourcing standard today"—although the standard does graciously leave the door open to "new entrants that meet [its] criteria."

ASTM D7612-10 was developed without the knowledge or participation of the environmental community. The current members of the committee responsible for developing the standard are nearly all representatives of companies in, associations of, or consultants to the forest products industry: they include employees of Weyerhaeuser, Roseburg Forest Products, the Canadian Wood Council, the Pacific Lumber Inspection Bureau, and the West Coast Lumber Inspection Bureau.



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THE SFI FIBER SOURCING STANDARD & ITS ASSOCIATED LABEL

SFI's Fiber Sourcing Standard is the basis for the most widely used SFI label, the Certified Sourcing Label, which appears on more than 90 percent of the products that bear an SFI label. However, SFI itself admits that the label has no connection to certified forests: as SFI's website states, "The SFI certified sourcing label does not make claims about certified forest content." This is a radical departure from the basic intent of forest certification: to connect market demand for responsibly harvested forest products to forests whose management is independently verified as meeting high standards.

What the SFI Fiber Sourcing Standard and its associated label do mean is that a company has **programs and policies** in place that create an appearance of addressing the impacts of logging but in fact require very little substantive change to business-as-usual practices. Under SFI, so-called "certified fiber procurement" is entirely system-based as opposed to performance-based: it does not

impose requirements or assess outcomes on the ground. **The Standard contains major loopholes, ignoring key aspects of genuinely responsible forest management such as sustainable harvest levels and protecting forests from conversion. As a result, all timber from all jurisdictions in North America can be—and is being—procured under SFI's Fiber Sourcing Standard.**

The environmental group Stand has published [a detailed report](#) on SFI's Fiber Sourcing Standard and other 2015-2029 SFI standards. Here is an excerpt from the analysis that relates directly to ASTM D7612-10's definition of "Responsible Sources:"

Provisions for use of "Best Management Practices" (BMPs) for water quality in source forests have serious gaps, and do not require any particular level of performance. The Fiber Sourcing Standard requires that sourcing in North America include a "program to require that harvests of purchased stumpage comply with best management practices," and that such direct purchases be pursuant to written agreements that require use of BMPs. These requirements, however, do not apply to fiber sourced less directly – which is likely to be a large proportion of some purchaser companies' inputs. Equally important, the standard does not require any particular level of BMP compliance in the source forests. The standard does require that companies sourcing in North America monitor suppliers' use of BMPs, evaluate the use of BMPs across their sourcing areas more generally, and use the results to identify areas for "improved performance." However, no thresholds are included for unacceptable levels of performance, and no specific actions or outcomes are required for "improved performance," not even discussions with suppliers, much less the exclusion of fiber from non-compliant sources from companies' procurement programs.

In addition, it's important to note that the rigor of so-called Best Management Practices (BMPs) vary widely from one jurisdiction to another: in some states or provinces, they are relatively stringent while in others they are quite weak. For example, Oregon's BMPs do not require that buffers of standing trees sufficient to maintain water quality and protect imperiled fish be left along the sides of all streams. Some stream types lack buffer requirements altogether, and logging companies can clearcut right over them. This results in significant negative impacts on water quality – so much so that in the spring of 2016 [the EPA and the National Oceanic and Atmospheric Administration \(NOAA\) slashed Oregon's federal funding by \\$1.2 million](#) after finding that Oregon's logging practices create dangerous levels of water pollution and harm fish.

In spite of this, the Oregon Department of Forestry is currently working through a process so that [ALL timber harvested in Oregon can be designated as being from "Responsible Sources"](#) whether or not it passes through a company with an SFI certified procurement system.

In summary, the ASTM 7612 definition of "Responsibly Sourced" allows timber from the entirety of North America to be designated as such – even if in actuality logging demonstrably harms water quality and fish.

Furthermore, **the ACP's requirement that 70% of the wood used in a project meet ASTM D7612-10's definition of "Responsible Sources" creates a virtual monopoly for wood from North America even if projects are located in other parts of the world.** It is entirely unclear how the "Responsible Sources" definition can be extended to other countries.

MORE PROBLEMS WITH ASTM D7612-10

Another major problem with ASTM D7612-10 is that its Certified Sources category recognizes all forest certification systems (FSC, SFI, PEFC and American Tree Farm System) as being equivalent even though there is abundant evidence that FSC is significantly more rigorous than SFI and the other systems.



For example, [a recent study](#) by the Yale School of Forestry found that:

- FSC is *far more prescriptive* than SFI, surpassing it in 37 out of 45 criteria. SFI is more prescriptive than FSC in only 5 criteria. Both systems increased prescriptiveness between 2008 and 2015, but FSC did so at a faster rate, adding more requirements in more key areas than SFI.
- FSC is more *performance-based*, emphasizing specific requirements and outcomes on key environmental issues like clearcutting, water quality, old growth, and restoration. SFI focuses more on *systems, or process-based* requirements like training and reporting that allow *more flexibility and do not specify management outcomes*.

ASTM D7612-10 contains yet another huge flaw for the purposes of the ACP: **its definition of “Non-Controversial (That is, Legal) Sources” (required of 100% of the wood going into a LEED project) is vague, providing very little detail on how wood products that are not from Certified or Responsible Sources can be designated as such.**

For example, the standard’s definition reads:

Products from non-controversial (that is, legal) sources are produced from jurisdictions with a low risk of illegal activity or from controlled wood standards, stair-step standards, legality assessments, or other proprietary standards. Products from non-controversial sources shall be traceable to the applicable jurisdiction, or chain of custody.

This definition raises more questions than it answers. It provides no guidance on a) how to determine if a jurisdiction is low risk; b) how to determine if products are covered by controlled wood standards, stair-step standards, legality assessments, or other proprietary standards; c) exactly which assessments or standards are acceptable; or d) how to trace products to a jurisdiction or chain of custody.

In short, project teams are largely left to guess as to how to fulfill the core requirement that all wood used in a LEED-certified building be verified as legal—which is, of course, the very basis of a legal wood prerequisite.

WE NEED A LEGAL WOOD PILOT CREDIT THAT ISN'T DESIGNED BY & FOR THE CONVENTIONAL TIMBER INDUSTRY

USGBC needs to move as quickly as possible to replace the current ACP and reference standard with a well-conceived pilot credit that contains clear procedures and documentation requirements for reducing the risk of using illegal wood in LEED projects while rewarding truly responsible forestry.