



Sustainable Forest Management

Your assurance of Canada's highest standards.

March 16, 2010

Mr. Thomas Mueller, President and CEO
Canada Green Building Council
319 West Pender Street, Suite 310
Vancouver, BC V6B 1T3

Ms. Lisa Bate, Chair, CaGBC Board of Directors
B+H Architects
481 University Ave., Suite 300,
Toronto, ON M5G 2H4

Dear Mr. Mueller and Ms. Bate,

Acceptance of the vast majority of proven legal and sustainable certified wood products from Canada, and the ability of architects and builders to make green buildings greener through the increased use of certified wood, are at risk in the ongoing USGBC process to develop benchmarks for the LEED certified wood products credit. **The CSA User Group requests your help in communicating serious concerns about the benchmark development process to the USGBC, and in advocating for acceptance of proven legal and sustainable wood from Canada.**

Canada was an early adopter of forest certification, and today has more certified forest area than any other country by a large margin. The three credible certification programs recognized in Canada are the Canadian Standards Association (CSA), Forest Stewardship Council (FSC) and Sustainable Forestry Initiative (SF). The largest share of Canada's forests is certified to the CSA Standard. CSA is known internationally for the development of standards through accredited standards development processes. However it is not as widely known that CSA has been setting the standard for certifying good forest management practices in Canada since 1996, when Canada's National Standard for Sustainable Forest Management (CSA Z809) was first published. The third edition of the standard was recently published as part of a regular public revision cycle that keeps the standard current, relevant, and aligned with the latest science.

The current draft of the USGBC benchmark system, with its narrow wording, seems designed to continue the purposeful exclusion of credible forest certification programs used in North America, despite the fact that they deliver legal and sustainable wood. It appears this has happened before. CSA was included in the first technical draft of LEED for new construction in Canada. The document, "Part II – LEED Canada Guide, 2002" included CSA along with FSC as certification programs eligible for the certified wood credit. However CSA was simply removed in subsequent drafts of the document with no explanation provided.

An outcome of this leaning towards exclusivity will be an increased import of certified forest products from other countries, produced under variable and lower environmental and social standards in spite of being certified, at the expense of local suppliers of certified wood from some of the world's best managed, public forests.

Further, the public consultation process for the benchmarks does not reflect the level of accountability and transparency that USGBC is demanding of either itself or of forest certification programs. Detailed concerns and suggestions provided to the USGBC during Round 2 of consultations were dismissed without explanation, then the ability to comment in Round 3 restricted to only a few benchmarks.

Please see the attached press release and letter to Mr. Rick Fedrizzi that highlight key concerns that remain unaddressed, including those specific to Canada's public forests, governance and legal structure.

The increased use of wood, which is the only renewable building material, lowers the environmental footprint of a building. The use of certified wood over non-certified wood lowers it even further. Changes to the materials guidelines that recognize the properties of wood in general, and certified wood in particular will have far more impact on the success of green buildings in reducing environmental footprint than squabbling over which certification program is best. Frankly we are puzzled and frustrated that USGBC does not seem to put much stock in the fact that widening the available suppliers would help keep costs down, provide a broader range of materials and product selection, and support North American producers – all of which serve to make green buildings more cost effective and sustainable. The intent of the certified wood credit should be to expand the use of certified wood rather than restrict it.

We ask for your involvement in these issues, and specifically, help in advocating to the USGBC for:

- A truly impartial process to set benchmarks, then fairly evaluate certification systems against them (a topic yet to be dealt with)
- The recognition of certified wood from the well managed public forests of Canada.
- Changes in the LEED rating system that credit and promote the use of wood

These changes would be in the best interest of a fair, credible green building rating system and the environment overall. An explanation about why CSA was summarily removed from technical drafts of LEED for new construction would also be appreciated.

We have requested a meeting with the USGBC in order have some direct communication and build understanding around these issues. This would be far more effective than continuing to miscommunicate publicly on topics of key importance to our organizations. A similar meeting with the CaGBC would also be welcomed for the same reasons.

Your consideration of this letter and attachments is appreciated, and we look forward to a response. Please let us know if you wish to discuss any of this information further or require additional information. To contact us, please send an email to info@csasfmforests.ca.

Sincerely,



John Dunford, Chair
CSA SFM User Group
4792 Tourney Road, North Vancouver, BC V7K 2W5
info@csasfmforests.ca

cc Mr. Rick Fedrizzi
CaGBC Board of Directors Executive Committee
CaGBC Chapters

The CSA SFM User Group is a voluntary group that represents organizations in Canada who certify their forest management operations to the Canadian Standards Association (CSA) Sustainable Forest Management (SFM) Standard. All members of this group are committed to the practice of sustainable forestry and to the international recognition and acceptance of the CSA SFM Standard.