



**The American Consumer Institute
Center for Citizen Research**

In regard to your request for comments, we believe that the US Green Building Council's current recognition of a single forest certification, the Forestry Stewardship Council (FSC) standard, is problematic -- both in terms of economic costs and environmental benefits. We urge the LEED standard to include a broader representation of standards in order to correct these problems.

Forest certification programs have become an important component in sound forestry management because they balance resource sustainability with economic viability. Yet the decision by the US Green Building Council to use only FSC for its LEED rating system upsets this balance by: 1) decreasing economic viability at home; 2) increasing consumer prices; and 3) potentially putting the environment at risk.

North America remains a world leader in certified forests. However, the adoption of FSC works to exclude three-quarters of the nation's certified forests, because 90% of FSC certified lands are outside of the U.S. In our [study](#), "The Monopolization of Forest Certification: Do Disparate Standards Increase Consumer Costs and Undermine Sustainability?" demonstrates that adherence to a single standard raises consumers prices (up to 20%), leads to billions of dollars in economic losses (\$10 billion per year for wood and \$20 billion per year for paper), and may put the world's environment at risk.

The report shows that there exists marketplace confusion over certification standards. Such standards could be driving prices up nearly 20% for those who are willing to pay more for sustainable wood and paper products but may not actually be getting something that is better for the environment.

While consumer costs increase, there is no evidence that the world's environment is better off with an FSC-only standard. Because of FSC's disparity in standards across the globe, the reliance on the FSC standard may incentivize the harvesting of wood in more environmentally risky locations. For example, due to the heterogeneous standards between countries, it is easier to take wood from virgin forests in Russia than a well-managed and controlled forest in the U.S. A regulatory bias for foreign wood could lead to an increased importation of foreign timber, thereby adding transportation costs and creating other environmental harms whose costs are ultimately burdened by the American consumer. Higher prices in the U.S. will also encourage consumers to substitute away from to less environmentally-friendly materials, including concrete, plastics and steel. In fact, there is no evidence that the FSC standard is better for the environment, but its costs and economic consequences are clearly higher. For this reason, the decision to use FSC as the sole certification standard is a departure from the goal of sound forestry management, because it upsets the balance between resource sustainability and economic viability.

Hundreds of elected officials nationwide and thousands of individuals and groups with expertise on land management have already commented on the current system or favor a more inclusive standard.¹ This includes elected officials such as Governors Paul LePage (ME) and Nathan Deal (GA) who issued executive orders within this past year to broaden green building standards to recognize multiple, viable forest certification programs.² In fact, a growing number of experts have urged for more inclusive LEED standards that award credits for use of multiple of certification systems including: FSC, the American Tree Farm System (ATFS), and the Sustainable Forestry Initiative (SFI). Our analysis suggests this is a better policy approach, compared to favoring FSC as the only standard eligible for credits. A system that recognizes multiple programs would better maintain competition and encourage US producers to more quickly adopt sound forest management practices and produce more environmentally-friendly wood and paper products. In turn, this would also incentivize organizations to achieve social and environmental benefits that are in balance with keeping consumer prices affordable and job creation on the rise. Striking that balance is critical so that American consumers can more easily embrace economically sound and ecologically smart products.

In closing, a revision of LEED can ensure a greater amount of sustainable, domestic forest products enter green building markets. It will support US communities, businesses, and jobs in a sustainable manner. We urge you to consider a broader adoption of standards that would benefit American consumers and not put the world's environment at risk.

Sincerely,

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¹ US Representative Kurt Schrader et. al., [Letter to USGBC](#), 07/15/10; US Representative Glenn Thompson et. al., [Letter to USGBC](#), 05/21/12; et cetera.

² Maine Governor Paul LePage, "An Order Regarding the Use of Green Building Standards in State Buildings," [Executive Order](#), 12/08/11; and Georgia Governor Nathan Deal, "Directing New Or Expanded State Buildings To Incorporate 'Green Building' Standards," [Executive Order](#), 08/10/12.