

02 August 05

Ms Maria Atkinson
Executive Director
Green Building Council
PO Box Q78
Sydney NSW 1230

Dear Ms Atkinson,

Thank you for your response to my letters of 7 June and 6 July 05 and I appreciate that the Green Building Council (GBCA) is now entering into dialogue with its stakeholders. However your letter did not adequately explain the issues we have raised nor did it meet our concerns for a number of reasons illustrated below.

1. Rapidly renewable content / locally produced materials

We realise the Green Star – Office Interiors (GS-OI) rating tool does not specifically state the exclusion of sustainable rapidly renewable content and locally produced materials ie. wool textiles, but the same result is achieved by not including sustainable rapidly renewable content in the Materials Category eco preferred criteria. The Materials Category criteria, which could be applicable to textiles, are as follows 1). recycled content, 2). certified organic (which constitutes a very small percentage of products) and 3) companies with Environmental Management Systems.

INSTYLE recognises that fit out items such as furniture can be certified with the 'Environmental Choice Label' for Environmentally Innovative Products, however this standard is a generic standard and we are aware of companies indicating that full credits (100 points) can be achieved with the Environmental Choice Label's Furniture and Fittings standard (currently in draft form) for fit out items such as chairs and workstations. It should be noted that for example, a 100% nylon textile (ie. derived from non-renewable and limited resources) that complies with the Environmental Choice Label Textile Standard satisfies the requirements of the Furniture and Fittings standard for textiles. Therefore, there is a possibility of certified chairs and workstations covered with 100% nylon textiles gaining full credits in a Green Star fit-out.

We are aware that GS-OI does not address textiles directly as they are a component of fit out items. However, the GS-OI influences architects, designers and furniture suppliers to apply the Materials Category criteria to the components (ie. is it made from recycled or certified organic content? does the manufacturer have an Environmental Management System?). Our clients are already asking if our textiles contain recycled content for green star projects and we are also aware of major private and public sector contracts being awarded to suppliers of imported PET textiles and carpets as they can achieve higher credit points in the GS-OI rating tool.

2. PET Items

Again, we realise the GS-OI rating tool does not specifically state to preference imported recycled PET textiles (and carpets) as well as making no reference to plastic bottles.

Rather our letters addressed the implications of the GBCA setting recycled and certified organic content as the only eco preferred criteria and the corresponding impact this has on the textile market.

The fact remains that the only commercially available textiles with recycled content available in Australia are recycled PET (polyethylene terephthalate) manufactured from plastic bottles. All PET fibre and almost all textiles/carpets are manufactured overseas and imported.

Whilst the use of post consumer waste is laudable I would question the justification and wisdom of importing other countries waste which, in the case of recycled PET textiles, will ultimately end up as Australia's landfill.

Therefore as highlighted the GBCA, in setting eco preferred criteria as recycled and certified organic content, is preferencing "in the case of textiles" recycled PET textiles.

We are aware that credit points are achieved for reused items.

3. Green Star – Office Interiors rating tool

The GBCA refutes that INSTYLE has sent a significant volume of technical and scientific information. However we do not agree with your assessment, below is a list of the information INSTYLE has provided to the GBCA:

Date	Information
29-06-04	1. INSTYLE feedback 2. Article – Codes and Standards by William McDonough & Michael Braungart – <i>this article highlights some of the potential hazards in focusing on recycled content and questions recycled content becoming the accepted standard as this would perpetuate both poor design and a dangerous system</i> 3. LIFE Textiles – Guidance for Use – <i>this is a list of the companies that can accept uncontaminated wool rich textiles for reuse/recycling</i>
23-09-04	4. INSTYLE summary after meeting with GBCA's Technical Manager, Chris Derksema and Marketing Manager, Suzie Guthridge – <i>this included many references</i> 5. Article – Synthetic materials for eco effective design by Jay Bolus – <i>this article addresses the environmental impact associated with recycled PET including the use of antimony which creates environmental and human health risks, particularly during production, disposal, and recycling. Current recycling methods don't eliminate these risks.</i> 6. Article - Indoor air quality and textiles – an emerging issue by B.Smith & - V.Bristow – <i>this article highlights wools ability to absorb common indoor air pollutants</i> 7. Waste management textile recycling research undertaken by INSTYLE – <i>this research found that only wool rich contract textiles are accepted for reuse/recycling in Australia</i>
05-04-05	8. ecospecifier listing – recycled PET textile 9. ecospecifier listing – LIFE Textiles
07-04-05	10. Letter to GBCA Technical Manager Chris Derksema – <i>this letter addresses some definitions of sustainable rapidly renewable content, as derived from standards such as EU Eco Label, Good Environmental Choice and Best Management Practice</i>

What is puzzling is what information the GBCA considers to be independent, substantive or a scientific impact assessment. As an example, in our feedback to the GBCA, we have

highlighted the many advantages of our product, LIFE Textiles (which does not achieve any credit points towards a chair or workstation in the GS-OI) over recycled PET textiles. We highlighted the fact that only uncontaminated wool rich contract textiles are accepted for reuse/recycling in Australia where as recycled PET contract textiles are not accepted for recycling in Australia. This fact was supported by a document outlining our contact with textile recycling companies in Australia, key staff at the Centre for Design at RMIT (and ecospecifier) acknowledge there is no infrastructure supporting the recycling of PET textiles and also the fact that “the majority of (fabrics disposed on in landfill) were synthetics as the non synthetic materials were generally recovered” (Centre for Design at RMIT 1997). In a conversation with the GBCA Technical Manager, Chris Derksema on this issue, his response was that he had asked someone and this person indicated that PET textiles could be recycled. Chris would not comment on who this person was nor could he confirm actually where PET textiles could be recycled.

The GBCA’s response to the issues raised and information provided by INSTYLE in the Response to Stakeholder Feedback is below. It is short on detail, ignores the issues and seeks to avoid future scrutiny of recycled products.

“The GBCA acknowledges that fitout items with reused/recycled content are not the only sustainable solution. The results of the Californian Governments Building ‘Materials Emissions Study’ (November 2003) indicates that “recycled content products should no longer be subject to scrutiny. Both alternative and standard products have the potential to emit chemicals of concern”.

During the development of Green Star – Office Interiors the GBCA sought expert advice regarding the environmental impact of fitout items. It was advised that the environmental impact of fitout items should be representative of the items whole of life impact”

Also of particular importance is wool’s positive effect on indoor air quality, which has not been recognised by the GBCA. Our references includes articles, such as ‘Indoor air quality and textiles – an emerging issue’ and ‘Removal of indoor air contaminants by wool carpet’. Furthermore, wool interior textiles are being trialed in the UK to combat sick building syndrome (Slater 2003). This contrasts with the potential human health hazards recycled PET textiles and carpets pose to building occupants.

Please note that INSTYLE is a commercial textile supplier and does not supply carpets.

4. Eco wool

We are aware that along with all textiles, wool textiles and in particular our product, LIFE Textiles made from either eco wool™ or certified organic wool will have an impact on the environment. We do not claim that LIFE Textiles has no impact rather a low impact on the environment.

The environmental impacts of all textiles are well understood by INSTYLE, hence our decision to develop LIFE Textiles rather than purchase “off the shelf” imported recycled PET textiles. The environmental impacts that you address such as “soil compaction, habitat loss, fertilizer dependence” etc are common issues of concern associated with wool growing, which we believe are substantially reduced in sourcing eco wool™ and certified organic wool for LIFE Textiles.

Furthermore our use of the terminology, eco wool™, is correct. The eco wool™ used in LIFE Textiles is below the maximum levels set for pesticides and chemical residues in the European Union Standard for Textiles.

You also mention that the number one environmental issue for Australia is “soil erosion from overgrazing” as recorded by the Central Intelligence Agency’s (CIA’s) ‘The World Fact Book 2005’. The CIA stated the following as environmental issues:

“soil erosion from overgrazing, industrial development, urbanization, and poor farming practices; soil salinity rising due to the use of poor quality water; desertification; clearing for agricultural purposes threatens the natural habitat of many unique animal and plant species; the Great Barrier Reef off the northeast coast, the largest coral reef in the world, is threatened by increased shipping and its popularity as a tourist site; limited natural fresh water resources” (Central Intelligence Agency 2005)

The use of this information without the disclosure of the entire paragraph is misleading. I am concerned that the reference to overgrazing has been used solely to justify your decision and its use is out of context. You attempt to draw a parallel between wool farming and overgrazing without any detailed reference to data verifying the split between cattle, sheep for food, sheep for wool grazing (which is used for apparel, carpets, interior textiles and other end uses) and other hoofed animals. We recognise that overgrazing is an important issue but being the number one issue is highly debatable. This is supported by the Department of the Environment and Heritage (Australia) where they cite population growth, land clearing, high-energy consumption and global warming as important and contributing factors.

Furthermore, this is not the viewpoint according to the Danish EPA:

*“Although overgrazing in general can cause soil erosion. the impact of sheep grazing can be considered a minor environmental issue.
.. the land devoted to wool production is often unsuitable for any kind of agricultural use. This is especially the case with coarse wool breeds which are reared on hillsides. Many parts of Australia are unsuitable for growing any other products because the soil is poor and the climate is too arid.” (Laursen et al. 1997).*

On the issue of wool growing, INSTYLE sources a lot of its eco wool™ from a Tasmanian farm. This farm applies a holistic farming approach without the use of artificial fertilisers, pesticides are not used unless absolutely necessary, rotation of crops and overgrazing is avoided as the sheep are moved every couple of days.

Wool growing does not place large demands on water as the GBCA notes. I would appreciate it if you would provide the supporting scientific evidence.

It is interesting that you raise the environmental impacts commonly associated with the lifecycle of a wool textile. However with the exception of raw material source and indoor air quality, the GBCA does not appear to be concerned with the environmental impacts associated with other stages in the product lifecycle such as chemical usage, production and transportation (particularly transportation as local production was not included in the Materials Category criteria).

Apart from utilising sustainable rapidly renewable resources such as eco wool™ and certified organic wool, LIFE Textiles are produced in Australia or New Zealand to strict environmental criteria which is applied to the entire supply chain. This includes the use of biodegradable processing agents and non-use of heavy metal dyes and dyes that are carcinogenic, mutagenic and toxic to reproduction. LIFE Textiles can absorb prevalent indoor air pollutants such as formaldehyde, sulphur dioxide and nitrogen dioxide and at the end of its life can be reused, recycled or biodegrade in the right conditions.

What is unfortunate and damaging to Australian woolgrowers, our local textile manufacturers, the environment and our industry is that such a superior product will not contribute to a product such as a chair or workstation achieving credit points in the GS-OI. Diversity is to be embraced in a social and environmental context, although the importance of this is not realised in the GS-OI rating tool. By not awarding credit points to sustainable rapidly renewable materials the GBCA is eliminating the choice of better sustainable textile and other product options.

The GBCA's feedback to our issues, which is quoted above, and your reference to overgrazing and water use in wool growing raises doubts on the validity of the decision making process that led to the Materials Category content. In the interests of openness and transparency, I request the GBCA to make available the information that informed its decisions in the Materials Category. Please include the organisation/person who submitted these documents.

We await with interest the substantive, independent and scientific data behind the decision to preference recycled materials over rapidly renewable raw materials.

5. Conflict of Interest

At the time when the GS-OI rating tool was being developed and launched, Interface had representatives on the Board, Technical Working Committee and Marketing Committee. As you are no doubt aware Interface is one of the worlds largest manufacturers of recycled PET textiles and carpets and therefore had a significant interest in the resulting rating tool. Subsequently Interface's recycled textiles and carpets will achieve full credit points in the GBCA GS-OI Rating Tool.

This is clearly a conflict of interest.

As the Executive Director of the GBCA you have the professional and ethical obligation to ensure there was no conflict of interest. The unfortunate result is the diminished reputation and independence of the GBCA and the GS-OI rating tool.

6. GBC Rating Tools

We have previously highlighted the fact that the GBCA has not included rapidly renewable content and locally produced materials in the GS-OI. Below is a summary of the GS-OI in comparison to LEED, the US Green Building Council rating system.

US Green Building Council & Canadian Green Building Council	Green Building Council of Australia
<i>LEED – Materials Category</i>	<i>Green stars – Materials Category</i>
- reuse of items	- reuse of items
- recycled content	- recycled content
- regional materials	- certified organic content
- rapidly renewable materials	- product manufacturer with EMS
	- product stewardship

With note to your comment:

“The WorldGBC has an agreed position that respects each member country’s ability to produce a rating tool product that meets local market needs and is benchmarked against local market practices and legislative precedents. In this model it is quite likely that rating schemes from different countries will take different positions on certain materials or products.”

However, we imagine that sustainability goals and the means to achieve them would be similar for each country. Such as:

- to reduce the use and depletion of finite raw materials by using rapidly renewable natural resources and,
- to use products that are extracted and manufactured within the region, thereby supporting the use of indigenous resources and reducing the environmental impacts resulting from transportation, particularly as global warming and climate change are a major issue

7. Transparency

As in my email to you on the 27 July 05, I note that you had published your response letter (to my letters) on the GBCA website. I note that my letters of the 6th June and 7th July were published only after I requested to enable your members and web site visitors to understand the issues raised in these letters equally. Particularly, as some of the details, as addressed in this letter, have been misunderstood by the GBCA and therefore misrepresented in your letter. I note that my letters have now been published and expect that this letter will also be published.

In summary from your response, the GBCA's justification for not including rapidly renewable content (ie wool) in the GS-OI Materials Category eco preferred criteria has been 1) The debatable allegation that wool farming / overgrazing is the number one environmental issue in Australia 2) The incorrect allegation that wool growing places large demands on water.

At the same time the GBCA appears to place no value on the benefits of wool and ignores the well-documented environmental and human health issues in regards to recycled PET textiles.

We therefore wait with interest the detailed supporting documents relating to the decision to preference recycled materials (ie recycled PET) over rapidly renewable materials.

In the meantime, I once again call upon the GBCA to revise the Materials Category to include rapidly renewable and locally produced materials or alternatively engage an independent organisation such as CSIRO to undertake a review of the GS-OI.

Yours sincerely,

Michael Fitzsimons
Managing Director

References

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cc.

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