



green building council australia

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2 September 2005

Michael Fitzsimons
Managing Director
Instyle Contract Textiles Pty Ltd
6-8 Ricketty Street
Mascot NSW 2020

Dear Mr Fitzsimons

RE: 25 August 2005 correspondence

The Green Building Council of Australia refer to its correspondence of 19 July and 15 August 2005 which it believes details opportunities available to Instyle to demonstrate the full life cycle comparison of wool versus pre-consumer and post-consumer recycled content fitout items and would welcome this information as part of the annual review of its Green Star – Office Interiors rating tool. The Green Building Council of Australia has also indicated it would support Instyle in seeking funding for this exercise as it is not aware of any precedent of this type of comparison in international research to date.

The Green Building Council of Australia has removed all Instyle related correspondence from its website as advised on 15 August 2005.

For clarification the Green Star – Office Interiors Material Calculator for Chairs automatically awards a 'Product Score' of 100% to all chairs classified as 'Reused' or 'Environmentally Innovative'. All other chairs are subject to further assessment across three environmental impact categories, as follows:

'Resource Utilisation' which assesses the chair's:

- Eco Preferred Content (EC); and
- Durability (DU).

'Management' which assesses:

- the chair manufacturer's EMS; and
- Product Stewardship (PS).

'Reusability' which assesses whether the chair is:

- Designed for Disassembly (DD).
- Complete the 'Name of Chair Supplier' and 'Brief Description of Chair' columns for each chair type.

- Complete the 'Number of Chairs' column for each chair type. To demonstrate compliance the applicant must provide information from the chair supplier(s) that quantifies the chairs supplied.
- Complete the 'Eco Preferred Content' column by using the drop-down menu to nominate one of three 'Eco Preferred Content' (EC) scores, as follows:
 - EC < 5% by mass;
 - EC ≥ 5% and < 20% by mass; or
 - EC ≥ 20% by mass.

The EC percentage by mass of the chair is the amount of 'Pre-consumer Recycled Content' and/or 'Post-consumer Recycled Content' and/or the amount of Forest Stewardship Council Certified timber that is included in the chair.

'Pre-consumer Recycled Content' and 'Post-consumer Recycled Content' is defined by the Australian Environmental Labelling Association Inc.'s 'Furniture and Fittings' Draft Standard No: AELA #-2005 dated 24/2/05, as follows:

Pre-consumer Recycled Content: "Material diverted from the waste stream during a manufacturing process. Excluded is re-utilisation of materials such as rework, regrind or scrap generated in a process and capable of being reclaimed within the same process that generated it."

Post-consumer Recycled Content: "Material generated by households, or by commercial, industrial and institutional facilities in their role as end-users of the product, which can no longer be used for its intended purpose. This includes returns of material from the distribution chain."

Forest Stewardship Council Certified timber is any timber which has been certified by the Forest Stewardship Council.

Organically certified products must be certified by a specialist organic certification body.

Eco Preferred Content relates to Pre or Post-consumer recycled or Organically certified renewable products or FSC-certified timber and are calculated on a mass basis and award the following:

- <5% - 0 points
- ≥5% and <20% - 6 points
- ≥20% - 10 points

Durability which is the number of years that the product is under warranty award the following:

- <7yrs - 0 points
- ≥7yrs and <10yrs - 6 points
- ≥10yrs - 10 points

The following questions are also asked and award the following:

- Does the product manufacturer have an EMS?
 - No - 0 points
 - Yes - 10 points

Does the EMS include waste and recycling rates and are they monitored and recorded quarterly?

Yes - 1 point

No - 0 points

Does the EMS include the energy consumption of manufacturing and is it monitored and reported quarterly?

Yes - 1 point

No - 0 points

Does the EMS include polluting gas and liquid emissions are they monitored and reported quarterly?

Yes - 1 point

No - 0 points

Does the EMS include material input and is it monitored and reported annually for each product?

Yes - 1 point

No - 0 points

If there the manufacturer is contractually obliged to take back the product for reuse/recycling at the end of life the following is awarded:

Yes - 10 points

No - 0 points

And finally where a given percentage of the chair can be readily disassembled using non-specialist tools into elemental components for reuse or recycling calculated on a mass basis the following is awarded:

<50% - 0 points

≥50% and <90 - 6 points

≥90% - 10 points

A fitout item such as a chair that contains wool is not excluded from the above criteria.

Once again the Green Building Council of Australia encourages Instyle to work with fitout item suppliers to obtain the "Environmental Choice Label" certification under the Australian Environmental Labelling Association Inc's Australian Ecolabel Program - Australian Voluntary Environmental Labelling Standard for "Environmentally Innovative Products" (Standard No: AELA 8-2005). This standard is applicable to fitout items.

In relation to the statement made in its correspondence dated 19 July 2005 in which the Green Building Council of Australia "notes the large demands on water for wool growing and considers any environmental comparison which does not address these two major impacts of wool production 'eco' or not, is not to be relied upon" - The Green Building Council of Australia relies on many resources and in this case references one of the most recent CSIRO Sustainable Ecosystems report "Balancing Act A Triple Bottom Line Analysis of the Australian Economy" Volume 2 in which the following reference is made:

*Against the metric of one dollar of final demand, the environmental indicators of **greenhouse emissions and water use** are about **seven times the average**, while **land disturbance** is **50 times the average**. The social indicators show that employment generation is 50% greater than average, income is 45% below average, and government revenue is 35% below average. The financial indicators show that operating surplus is 60% greater than average, export penetration is four times the average, and import penetration is 50% below average. While the historical importance of wool to the Australia economy appears to be waning, considerable effort is being devoted to improving its fractured supply chain, and gaining access to synthetic garment markets from which it has been excluded. This analysis highlights environmental impacts in relation to financial returns.*

Place of Industry in the Economy

*The sheep and shorn wool sector ranks 44th out of 135 sectors in terms of value adding in the economy, and contributes 0.46% of GDP in this analysis. It is similar in value adding to the meat products and plastic products sectors. It is a moderate employer with 31 000 employment years directly embodied in final demand, and another 11 000 years in the sector's suppliers, giving a total of 42 000 employment years. In addition, the sector supplies 24 000 employment years to the final demand of downstream industries such as processed wool, meat products, and clothing. **The sector has relatively large resource requirements in absolute terms, with over 20% of national land disturbance, 2.7% of water use, 2.8% of greenhouse emissions, and 0.3% of energy use.** In financial terms, exports are nearly 20 times the level of imports.*

Strategic Overview

*The spider diagram portrays the sheep and wool sector with a number of pronounced outliers for the environmental indicators of **land disturbance, water use and greenhouse emissions**. The financial indicators, as well as the social indicator of employment generation, are well above average. The environmental indicators reflect the physical realities of the production process, which are indexed against a market price currently struggling to maintain an appropriate exchange value that reflects the complexity of the production chain. **Downstream issues include animal welfare, the live sheep trade, landscape health and biodiversity loss.** Although there is much media comment on the demise of the wool industry, the sector is still important for the rural economy and provides an important underpinning for many rural communities, and for efficient and viable farm production systems.*

The Green Building Council of Australia once again encourages Instyle to demonstrate the full life cycle comparison of wool versus pre-consumer and post-consumer recycled content fitout items and would welcome this information as part of the annual review of its Green Star – Office Interiors rating tool.

Yours sincerely



Maria Atkinson
Executive Director