

17 March 06

Romilly Madew  
Chief Executive (Acting)  
Green Building Council  
PO Box Q78  
Sydney NSW 1230

Dear Ms Madew,

**Re: Green Stars – Office Interiors rating tool**

Thank you for the Green Star Stakeholder Submissions – Green Building Council of Australia Response.

I would like to make the following comments in reference to this document:

- In past correspondence and in the current Stakeholder Submissions Response, the GBCA has maintained that the reason for not including rapidly renewable materials in the options for Eco Preferred Content is because there is no standard definition of ‘rapidly renewable’.

I find this difficult to accept. Rapidly renewable is widely known to indicate a material that regrows in a short time period. Ecospecifier defines rapidly renewable as a resource that “regrows in less than 3 years”. The US Green Building Council’s LEED system defines rapidly renewable materials as those “that are typically harvested within a ten year or shorter cycle”.

The GBCA has stated that the “short regeneration cycle of a material or the local manufacture of a product do not guarantee a minimal impact on the environment”. The intent of using rapidly renewable materials is to reduce the use and depletion of finite raw such as petroleum-based materials and long cycle renewable materials by replacing them with rapidly renewable materials.

The GBCA has misunderstood the reasons to include locally produced content on the options for Eco Preferred Content. I agree that local production does not guarantee a minimal impact on the environment and this was never implied by INSTYLE. The reason to include locally produced content in the Eco Preferred Content options is because this contributes to local employment and income as well as reducing the transportation impact when importing products. It is for this reason that locally produced content is recognised through the US Green Building Council’s LEED rating system.

- The GBCA states:

*‘As previously advised, the GBCA does not rate or evaluate specific products or materials and relies on third-party certification to validate the claims made by manufacturers and currently, there is no standard third-party certification for rapidly renewable materials.’*

This statement is perplexing, as there is no standard third-party certification for recycled materials either, which previously the GBCA had defined as an Eco-Preferred Content criteria option.

- We are pleased the GBCA now recognises that “recycled content does not guarantee a minimal impact on the environment”. However, the GBCA’s decision to revise the Green Star – Office Interiors rating tool so that “only products with third party certification are on the

list of options for Eco Preferred Content” (and therefore recycled content is no longer on the list of options for Eco Preferred Content) is unfortunately no better.

As we mentioned in previous correspondence, in the case of textiles, it is possible for a 100% virgin nylon, polyester or acrylic textile to achieve third-party certification with the Australian Environmental Labelling Association’s (AELA) Textile Standard. 100% virgin synthetic textiles should not be deemed as environmentally preferable as they fail to meet many of the sustainable design criteria (such as rapidly renewable or recycled resources) over their lifecycle and are manufactured from a finite, non renewable resource ie. petroleum and contain numerous toxic chemicals.

So it is possible with the current Eco Preferred Content options in the Green Stars – Office Interiors rating tool, to be surrounded by third party certified 100% acrylic or nylon textiles. The current GBCA’s position will undoubtedly result in a situation where there are no benefits for either the occupants of a Green-Star rated building nor for the environment.

Disturbingly, we are aware that at least one GBCA member company has AELA certification for a 100% virgin polyester fabric and is using this certification to promote this product as an ‘eco fabric’.

This situation is surely unacceptable to the GBCA and once again undermines the credibility of your organisation and the green stars rating system.

- As we have consistently recommended, we again ask the GBCA to include rapidly renewable content, recycled content and locally produced content in the list of options for Eco Preferred Content. These options are recognised by the US Green Building Council, Ecospecifier and the Centre for Design (all of whom the GBCA consulted with in the development of the rating tool).

I would appreciate a response from the GBCA and am available on 02 9317 0250 should you wish to discuss these important issues.

Yours sincerely,

Michael Fitzsimons  
**Managing Director**

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