

25 August 05

Maria Atkinson  
Executive Director  
Green Building Council (GBCA)  
PO Box Q78  
QVB NSW 1230

Dear Ms Atkinson,

Re: Your letter of 15 August 05

Thank you for your response to my letter dated 2<sup>nd</sup> August 05 (which corrected the many inaccuracies made by the Green Building Council of Australia (GBCA) in your letter dated 19<sup>th</sup> July 05).

However we are going around in circles and your most recent letter attempts to cut off any further dialogue. It would appear you are determined not to address the long-standing issues.

I am not sure whether this is due to the failure of the GBCA to comprehend and address (or perhaps deliberately avoid) the issues we have raised and reiterated in our most recent correspondence (7<sup>th</sup> June, 6<sup>th</sup> July and 2<sup>nd</sup> August). The GBCA's responses are not what most would define as an effective 'stakeholder feedback' process nor is there evidence of "openness and transparency".

You state that the GBCA Green Stars – Office Interiors (GS-OI) does not exclude product or materials. As we have stated many times previously, we realise the GBCA GS-OI rating tool does not specifically exclude products and/or materials but in setting Materials Category criteria, any product/material that does not meet any or all of the criteria will be excluded.

The GBCA has set the Materials Category criteria as follows:

1. Recycled content
2. Certified organic content and,
3. Manufacturer with an EMS and/or ISO 14001.

Therefore, products made from rapidly renewable resources such as eco wool are not included in the above criteria and are therefore excluded. Can we agree on this point?

And again, we realise the GS-OI does not address textiles directly, but the criteria addresses the environmental impact of fit out items such as chairs, workstations etc. and this same criteria is applied to its components such as textiles, thus affecting textile selection.

The GBCA has encouraged INSTYLE to gain the "Environmental Choice Label" certification in order to gain credit points. However, sustainable rapidly renewable products such as wool textiles should be recognised in their own right without the added cost for a license from the Australian Environmental Labelling Association. The Centre for Design at RMIT, Ecospecifier, internationally reknown sustainable design practitioners Michael Braungart and William McDonough, and the US Green Building Council (USGBC) all recognise rapidly renewable resources, along with recycled resources, as the preferred raw materials in sustainable design.

In your most recent letter and letter of 19<sup>th</sup> July, you refer to Instyle as a supplier of wool carpets, however in my email dated 27<sup>th</sup> July and my letter of 2<sup>nd</sup> August I pointed out that INSTYLE is a supplier of commercial textiles and not carpets. I would appreciate it if you could take note of this for future correspondence.

You have also indicated that the GBCA is open to new research. Ecospecifier has conducted some research into wool's positive effect on indoor air quality and now recognises wool's ability to absorb prevalent indoor air pollutants such as formaldehyde, sulphur dioxide and nitrogen dioxide. Below is a draft listing for one of our wool based products:

*IAQ: Research has shown that wool absorbs and retains airborne formaldehyde, nitrogen dioxide and sulphur dioxide. It can also buffer thermal and humidity changes within a room. The IAQ benefits are proportional to the wool area available and so are largely associated with carpet use within a building but the principle also applies to wool textiles. How this is tempered by associated soft furnishings (like upholstery foam) is not specified. Reference:*  
[http://www.canesis.com/AnnualReports/2002\\_Highlights.shtm](http://www.canesis.com/AnnualReports/2002_Highlights.shtm)

We are aware that indoor air quality is addressed in a separate section. Our emphasis has been that our sustainable textile collection, LIFE (Low Impact For the Environment) Textiles, designed to address all stages in the life cycle and made from sustainable rapidly renewable resources such as eco wool™ are not able to meet the Materials Category criteria as defined by the GBCA.

The GBCA's focus on recycled content is therefore ironic because in the case of textiles (which are used in fit out items chairs and workstations), the only textiles with recycled content are PET (polyethylene terephthalate) textiles produced overseas from other countries waste ie plastic bottles recycled into yarn/fabric. PET textiles have a greater potential to negatively impact indoor air quality as PET is covered with synthetic dyes, chemicals and contains other questionable substances which can become air borne through abrasion (McDonough & Braungart 2002). The dyes used in recycled PET textiles generate volatile organic compound (VOC) emissions over the life of the material (ecospecifier 2005).

In my previous letters I have requested to see the research behind the GBCA's decision to preference recycled content and exclude rapidly renewable content. To date no information has been provided by the GBCA. In light of the GBCA's unique stance (ie preferencing recycled over rapidly renewable resources that is contrary to its predecessors such as the USGBC and the Centre for Design at RMIT) the onus is on the GBCA to now provide such information to support it's position.

So far the GBCA has been unable to provide any credible supporting information backing their decision not to include rapidly renewable content in their Materials Category criteria. The two comments in your letter of 19 July have been either completely incorrect or quoted out of context from a questionable source. It is also interesting to note that whilst the GBCA asserts its independence from overseas GBCA organisations the source for your claims were US based and it is concerning that you did not seek reference materials from the Australian Department of Environment and Heritage that found your position on over grazing debatable at best.

My requests for the GBCA's supporting research/information has been ignored, but I now request in the interest of the GBCA's open and transparent policy the supporting research that led to the decisions behind the establishment of the Materials Category criteria.

It has also come to our attention in a recent edition (Issue 543 August 16 2005) of Environmental Manager, the GBCA stated the LIFE Textiles product information provided by INSTYLE "lacked comprehensiveness". This comment is incorrect and damaging to INSTYLE.

We have at all times been willing to provide substantive information regarding our LIFE Textiles collection and support our position on the above issues.

In reviewing the GBCA's feedback and correspondence, I struggle to understand the nature and sources of the information that is guiding the GBCA. You claim the references provided by INSTYLE such as the Centre for Design, Ecospecifier, LEED, School of Textiles at the N.C.S.U. and MBDC (McDonough Braungart Design Chemistry) were not comprehensive. Yet the GBCA have been unable to support the decision to not include rapidly renewable content in the GS-OI rating tool.

For clarity the unanswered questions and information we are seeking are as follows –

1. To make available all the information, including the minutes of the Technical Working Committee, which informed its decisions in the Materials Category and details of the organisation/person who submitted these documents.
2. Research to support GBCA's claim that "wool grazing requires substantial amounts of water" made in your letter dated 19<sup>th</sup> July.
3. Why the GBCA attempted to discredit wool by quoting out of context a US Central Intelligence Agency website rather than the Australian Department of Environment and Heritage. In using this quote out of context there was no consideration of other products (ie. lamb, beef, leather hides) that result from the same activity.
4. When will the GBCA rectify the current situation and include rapidly renewable content in the Materials Category criteria.
5. When will the GBCA approach an independent organisation such as the CSIRO to conduct an independent review of the GS – OI Materials Category criteria.

Also, I find it simply astounding that you continue to defend the conflict of interest with Interface having company representatives (and sole representative of the textile industry) on the Board, Technical Working and Marketing Committees when the GS – OI rating tool was being developed. Whether or not Interface had any influence on the process is not the issue (and it is unclear if there was any influence at all, as you have refused to provide any information as requested) however what is clear is the considerable commercial benefits this rating tool will provide this organisation.

I expect most observers would agree that this was a totally unsatisfactory situation. One that surely leads to further questioning of the probity in the decision making of the GS –OI, the true independence of the GBCA and its right to set environmental standards, particularly as your actions clearly show that the GBCA is unwilling to be held accountable to its stakeholders.

I trust that on this occasion and in the "interest of transparency and openness" you will finally provide the answers and information we have been seeking since April 2005.

Unlike previous occasions I would also appreciate if you would publish this letter on the GBCA website immediately upon receipt so as all stakeholders can continue to be fully informed.

Yours sincerely

Michael Fitzsimons  
**Managing Director**

References

McDonough, W & Braungart, M 2002, *Cradle to cradle*, North Point Press.

cc.

GBC Board Members:

Minister for Environment  
VIC Premier  
Shadow Minister for Primary Industries:  
VIC Minister for Environment  
NSW Minister for Environment  
SA Minister for Administrative Services  
SA Shadow Minister for Environment  
Parliamentary Secretary  
General Manager Woolmark  
Aust Wool Growers Ltd  
ACTU  
TCFU  
QLD Department of Public Works

Peter Verwer, Bob Nation, Che Wall, Ken Maher,  
Chris O'Donnell, Brendan Crotty, Daniel Grollo,  
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