

29 November 2005

Green Building Council

Re: Green Stars – Office Interiors Feedback – 2005 Annual Review

Further to our numerous correspondence in the past year, we would like to submit the following feedback for the 2005 annual review of the Green Stars – Office Interiors rating tool:

1. Exclusion of rapidly renewable content and locally produced content

INSTYLE is greatly concerned that other environmentally benign materials such as rapidly renewable content (certified organic is included but this accounts for a very small percentage of products) and locally produced/Australian content are not included in the Materials Category eco preferred content.

Rapidly renewable and locally produced content are recognised by the Centre for Design, Ecospecifier and the US Green Building Council's LEED (Leadership in Energy and Environmental Design) system, all of whom the GBCA consulted with in the development of the rating tool.

The GBCA has been unable to adequately justify why they have taken this unique stance. The GBCA's initial feedback in the Stakeholder Feedback at the beginning of this year is quoted below:

"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.

The GBCA's response of "recycled content products should no longer be subject to scrutiny" is not substantive. Why should recycled content products not be subjected to scrutiny like all other products? In previous correspondence the GBCA has recommended products made with rapidly renewable content to pursue a third party certification with the Australian Environmental Labelling Association however a third party certification is not required for recycled content. Is this the basis on which the GBCA has exempted recycled content from requiring third party certification?

In setting the current eco preferred content, the GBCA is preferencing, in the case of textiles, textiles made from PET (polyethylene terephthalate) plastic bottles, the only recycled content textiles available in Australia. PET is produced overseas and contains hazardous substances such as antimony, arsenic, chromium, formaldehyde, volatile organic compounds (VOCs), cobalt, zinc, plasticisers and other questionable substances (McDonough & Braungart 2002). Upholstery abrades during normal use; therefore it is highly possible that these hazardous particles might be inhaled, swallowed and negatively affect indoor air quality. Moreover, whilst it is theoretically possible for recycled PET textiles to be recycled again, there is no infrastructure in Australia to do so, so the textile at the end of its useful life will end up in landfill.

Such a narrow focused environmental approach eliminates the choice of better sustainable options. The outcome of this approach, in the case of textiles, preferences an imported recycled PET textile over superior Australian grown eco wool textiles produced to strict environmental criteria by local manufacturers, which benefit indoor air quality and can be reused, recycled or will biodegrade in the right conditions. This narrow approach extends to the entire rating tool where the focus is on gaining maximum Green Star credit points regardless of whether they add environmental value or on good design.

The GBCA maintains the Materials category addresses common fitout items such as chairs and workstations, and not the components, however INSTYLE is finding that the same criteria is being applied to the individual components of these items such as textiles. It is feared there will be detrimental environmental outcomes if the GBCA's definition of eco preferred content are adopted more widely.

The GBCA has recommended INSTYLE to commission a lifecycle comparison of wool versus pre and post consumer recycled content. However this should not be necessary. Rather, the onus should be on the GBCA to justify why they have gone against sustainable design principles and the Centre for Design, Ecospecifier and the US Green Building Council's LEED system (all of whom the GBCA consulted with in the development of the rating tool), to exclude sustainable rapidly renewable content and locally produced content in the first place.

Interestingly, why has the GBCA not commissioned this comparison before it made its decision to support recycled content (such as PET textiles) over rapidly renewable content?

2. Conflict of Interest

The development of Green Star rating tools has not been transparent and it is unclear whether or not there was any influence from GBCA members. A conflict of interest has resulted from a large product manufacturer who has representation as a GBCA Board Member, member of the Technical Working Committee and the Marketing Committee (and as the sole representative of the industry) during the development of the GS-OI rating tool.

The fact that many of this company's products achieve high credit points in the GS – OI rating tool over sustainable products made locally from eco wool adds weight to our concern.

Therefore, we would like the minutes and supporting material that supports the GBCA's unique stance to be made publicly available to all interested parties.

3. AELA Certification

With regards to third party certification with the Australian Environmental Labelling Association (AELA), we would make the following points in relation to the GS-OI rating tool –

- a. The GBCA has recommended rapidly renewable components such as textiles to receive third party certification with AELA as an option to contribute credit points in the Materials Category criteria. However, recycled content components (PET textiles) are able to contribute credit points without third party certification.
- b. The certification process is expensive and it is obviously unfair and anti competitive that recycled content products (such as PET textiles) do not require the same third party certification nor incur the subsequent costs.
- c. Further, according to the GS-OI materials calculator, AELA certified rapidly renewable components will only contribute credit points if the piece of furniture/fit out item it is being upholstered onto is also AELA certified. This contrasts with recycled content (recycled PET textiles) where credit points can be achieved regardless of whether the furniture piece is AELA certified or not.
- d. This situation clearly demonstrates that recycled content products (recycled PET textiles) have preferential status and an unfair competitive advantage over rapidly

renewable products as a result of their exclusion from the GS – OI rating tool Materials Category criteria. Furthermore in setting the current eco preferred content, architects and designers are under the impression that only recycled PET textiles can be used for Green Star projects.

- e. It should be recognised it is possible for a 100% virgin nylon or polyester textile to achieve AELA certification and therefore be regarded as environmentally preferable. 100% synthetic textiles should not be deemed 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 and non renewable resource ie petroleum and contain numerous toxic chemicals.

INSTYLE once again recommends the GBCA to include rapidly renewable and locally produced in the Materials Category criteria and be given the same status as recycled materials in the GS – OI rating tool. As mentioned previously, we would be happy to discuss the issues we have been raising since earlier this year.

Yours sincerely,

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