



Your assurance of Canada's highest standards.

July 5, 2010

Mr. Thomas Mueller, President and CEO
Canada Green Building Council
319 West Pender Street, Suite 310
Vancouver, BC V6B 1T3

Ms. Lisa Bate, Chair, CaGBC Board of Directors
B+H Architects
481 University Ave., Suite 300
Toronto, ON M5G 2H4

Dear Mr. Mueller and Ms. Bate,

The Canadian Standards Association (CSA) SFM User Group would like to keep in touch as the development of the LEED certification benchmarks continues.

First, thank you for the meeting that was held last month between Thomas Mueller, Paul Wooding, and myself. It helps to have been able to share information directly and build understanding around the issues we have been writing and submitting comments about.

It is hoped that meeting also helped to dispel a few myths about CSA:

- CSA is a standard setting organization, not an industry driven or trade association. Please see the attached letter from the Chair of the CSA SFM Technical Committee, Dr. Peter Duinker to Mr. Nadav Malin of Environmental Building News, past Chair of the MR TAG.
- CSA is not the largest standard in Canada because it is an easier bar to achieve. Rather, it was the first standard in Canada, available in 1996. FSC's Maritime Standard followed in 1999, the BC standard in 2003, and the Boreal standard in 2004. CSA is also Canada's national standard and was written specifically for application in Canada's forests, whereas FSC was written for application worldwide, and SFI is applied in North America.
- The standards used in Canada, applied on top of Canada's legal framework, do not treat clearcutting, GMOs, plantations or Aboriginal People any differently on the ground. The CSA, FSC and SFI standards are all good choices and provide assurances of legality and sustainability. The interactive certification map at www.certificationcanada.org shows how these standards are applied side by side, and increasingly on the same forest area. Certification to one standard makes it easier to certify to another, as many of the elements are already in place.

Second, I would like to provide our thoughts on the USGBC's fourth version of the certification benchmarks for the LEED green building rating system.

Unfortunately we are again disappointed in the narrow opportunity for review and comment – limiting comment to a handful of the 80 benchmark criteria. There are also still several areas where the benchmark language remains narrow in scope and misses the mark in ensuring forests are managed sustainably. And more generally, the overall LEED rating system disadvantages sustainably harvested wood products compared to other building construction materials.

Having said that, the User Group also supports many of the limited areas where change has occurred. For example, this fourth draft of the benchmarks rightfully clarifies that the benchmarks can be met by the regulatory requirements of the jurisdiction in which they are applied. This is a key point for the CSA Z809 SFM standard, since there is already a solid foundation of laws governing the management of Canada's public forests. The CSA SFM standard sits on top of that foundation and avoids repeating much of what is already required by law.

Our detailed comments as submitted online are attached. Despite the limited opportunity to comments they do include "recycled" comments that we feel strongly are important to reconsider.

And finally, I would point out the new promotional logo being used on this letter. It links the CSA SFM standard to the global Programme for the Endorsement of Certification schemes (PEFC) which endorses the CSA standard as meeting international requirement for Sustainable Forest Management.

Your engagement and consideration of this material are appreciated, as would be your help in advocating for acceptance of proven legal and sustainable wood from Canadian forests.

Sincerely,



John Dunford, Chair
CSA SFM User Group

Attachments Letter from Dr. Peter Duinker (Chair, CSA SFM Technical Committee),
to Mr. Nadav Malin (Environmental Building News).

CSA SFM User Group Comments on LEED Round 4

cc CaGBC Board of Directors Executive Committee
CaGBC Chapters
Mr. Rick Fedrizzi
Mr. Steve Baer, MR TAG Chair
Mr. Lee Gros, MR TAG Vice-Chair

The CSA SFM User Group is a voluntary group that represents organizations in Canada who certify their forest management operations to the Canadian Standards Association (CSA) Sustainable Forest Management (SFM) Standard. All members of this group are committed to the practice of sustainable forestry and to the international recognition and acceptance of the CSA SFM Standard.