

## Direct from Greenbuild: examining product transparency requirements in LEED® v4

*By Bill Griese, LEED AP BD+C, Standards and  
Green Initiative Manager, Tile Council of North America*



LEED v4 was the focal point of Greenbuild 2013, as the recently-revised rating system was officially made available for project registration. Most attention was given to the substantially revised Material and Resource (MR) Credits, and the hottest topic – without a doubt – was product transparency. The introduction of a new MR Credit requiring the inventorying and disclosure of chemical ingredients used in products certainly did not come without controversy, confusion, or uneasiness. Many Greenbuild attendees spent the majority of their time at the show expressing their concerns and, ironically, seeking transparency regarding the requirements and intent of the new credit.

The new LEED v4 MR Credit 115 “Building product disclosure and optimization – material ingredients” allows for a project to be awarded up to two points if conforming products are used. In order for the first point to be obtained, twenty products used on a project shall come from manufacturers who have demonstrated chemical inventories for those products. There are several established programs manufacturers may use for their products to satisfy this requirement, but the most well-known is Health Product Declaration (HPD).

In concept, HPDs are simple. Manufacturers go online, provide information about their product, and an online

tool outputs and inventories in accordance to the HPD Open Standard chemical ingredient information with known hazards identified. Also, a second point may be obtained through this credit, either through the usage of a certain percentage of products with ingredients inventoried via HPD and certified to meet certain “safe” levels of various third party programs, or through the usage of products from manufacturers with third party verification of their supply chains that addresses safe ingredient handling and reporting procedures.

While simple in concept, many are uncomfortable with HPDs for a few reasons. First, there are fears of information overload, and architects and specifiers feel it is not their job to scrutinize every chemical ingredient. Secondly, pure chemical-ingredient reporting can be misleading, especially when some chemicals are actually encapsulated in – or a component of – a compound which is in fact harmless. In general there is a fear about who will maintain this information, and whether or not it will be used responsibly in the future.

Also, while manufacturers have the option to pursue product HPDs for free, submitting such information requires a level of expertise which smaller companies might not have readily available on staff. As a result, many third party organizations are already being hired

by manufacturers to complete HPDs. Often times, these third party organizations’ services include the option to certify HPDs, creating new marketplace demands which might ultimately pressure manufacturers into third-party certification of HPDs. Additionally, there is a cost associated with verifying that ingredients fall within the safe levels identified by the programs outlined under this LEED MR Credit. Many worry that demands will grow beyond the free one-point reporting option as many projects begin seeking products with verified safe-ingredient lists that contribute towards the second point as well. There is also some discomfort with how some of these programs are managed and the science behind how some procedures for identifying hazardous chemicals are determined.

Where do we go from here? In general, most people are still organizing their thoughts on the subject as a whole, and many product industries are playing catch-up to become properly informed on the actual requirements in LEED and what product transparency initiatives actually entail. While at least one industry continues in its effort to appeal the new LEED provisions, a plethora of manufacturers have already started pursuing HPDs independently, and it is likely that the demand for product ingredient transparency will continue to grow.