Public Comment

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Industry Standard: Construction Materials
Disclosure Topic: Product Innovation
Accounting metric code: TA04-34-01
Line of disclosure: 52-54

Comment: The most recent trend in sustainable design is for disclosure of environmental impacts, hazardous ingredients, and the responsible sourcing of materials through the lens of life-cycle thinking. Single attribute certifications, such as low emitting materials, regional materials, certified wood products, bio-based products, and recycled content, etc. are being de-emphasized for holistic life-cycle thinking. A company can qualify by disclosing their environmental impacts. This doesn’t mean the product is a “sustainable” or “environmentally beneficial” product. The intent is to drive disclosure, so comparisons and evaluations can be made for preferred selection. With this, it’s hopeful that disclosure will drive the market with products disclosing a lower environmental footprint.

This should be considered when considering SASB copy pertaining to “products can be used to obtain credits in certifications. “ Because, a company willing to disclose the environmental impact of their products could report 100% as their percentage to meet the accounting metric, although the product could be the highest impactful product they manufacture. However, demonstrating an improved footprint or lower environmental impacts may be more applicable since provisions for optimizing product environmental performance are being integrated into sustainable design standards. Please see USGBC LEED version 4, Materials & Recourses, Credits 2,3 and 4.