



AmericanCoatings
ASSOCIATIONSM

May 24, 2024

U.S. Green Building Council (USGBC)

****submitted online via USGBC credit library*

RE: ACA Comments on USGBC on the Latest Green Building Rating System (LEED v5)

To Whom It May Concern,

The American Coatings Association (ACA) submits the following comments to USGBC for consideration to the Leadership in Energy and Environmental Design (LEED) v5. ACA is a voluntary, nonprofit trade association working to advance the needs of the paint and coatings industry and the professionals who work in it. The organization represents paint and coatings manufacturers, raw materials suppliers, distributors, and technical professionals. ACA serves as an advocate and ally for members on legislative, regulatory, and judicial issues, and provides forums for the advancement and promotion of the industry through educational and professional development services. The ACA represents approximately 96% of the paint and coatings products manufactured in the United States, including architectural, industrial, and specialty coatings.

The \$32 billion paint and coatings industry manufactures a wide variety of coatings products for consumers, businesses, and manufacturing establishments alike and plays a critical role in helping to preserve and protect our infrastructure. Coatings are extensively used on buildings, across the pipeline infrastructure, on steel structures like bridges and railroads, and on the roads as traffic markings.

The comments below have been submitted to USGBC LEED through the online LEED credit library under the rating system(s) indicated within parentheses and to the identified credit category.

1. Carbon Assessment Prerequisite (New Construction; Commercial Interiors; Core and Shell)

The 25-year projected carbon assessment prerequisite may strive to reduce long-term carbon emissions, yet this prerequisite fails to address how this assessment directly helps achieve decarbonization by 2050. This prerequisite does highlight that projects must assume renovations occur every 10 years which would

add to the embodied carbon of the facility or site. While this projected assessment would be based on currently available products, it is unclear on how to guarantee future facility management teams overseeing the renovations would use products that meet or exceed the desired criteria identified in the 25-year projected carbon assessment. ACA recommends that USGBC include a provision on how this assessment and the criteria identified within in it to be conveyed to future facility management teams in order to better ensure the 25-year projected carbon assessment will directly impact the long-term reduction of carbon emissions for a facility.

2. Sustainable Sites - Heat Island Reduction (New Construction; Existing Buildings; Core and Shell)

While this credit category strives to mitigate the impacts caused by heat islands through various strategies, there lies the opportunity for additional measures USGBC should consider. Under “Option 1 Nonroof and Roof,” there are several measures listed that use solar reflectance of structures including the Cool Roof Rating Council’s (CRRC) ANSI/CRRC S100 - “Standard Test Methods for Determining Radiative Properties of Materials.” ACA has been working closely with the Cool Roof Rating Council (CRRC) on the development of their Wall Product Rating Program, which provides product ratings based on the surface radiative performance of products used on exterior walls, many of which are paints and coatings. The CRRC is also working to update the ANSI/CRRC S100 standard to include test methodologies for rating exterior wall products. The rated products are then publicly published on the CRRC’s Rated Wall Products Directory. Cool exterior walls, like cool roofs, have the capacity to reflect sunlight and solar energy which minimizes the amount of heat conducted into the building.

For that reason, ACA requests USGBC add the following measure under Option 1 as a nonroof measure for credit, ‘*Use of a rated cool exterior wall product.*’ Similarly, ACA also requests USGBC add ‘*Use of a cool cement or pavement product*’ as a nonroof measure for credit under Option 1.

3. Materials and Resources - Low Emitting Materials (New Construction; Commercial Interiors; Core and Shell)

In LEED v4.1, this section specified percentages that materials would be required to meet with regards to VOC emissions evaluation and VOC content. While LEED v5 is a new system and the materials listed remained the same, the percentages associated with those materials are no longer included, which could lead to some ambiguity because of the familiarity of this section in LEED v4.1. ACA requests that USGBC provide some clarification into this change.

In the Materials and Resources credit category, the low-emitting materials list under the VOC emissions evaluation criteria states that a “product is inherently nonemitting, salvaged, or reused” can gain credit. Furthermore, the term “salvaged and reused materials” is then defined to be a product that “is more than one year old at the time of use.” It is unclear if this term also includes the incorporation of recycled content, such as raw materials in paint. ACA requests that USGBC clearly define the terms “salvaged” and “reuse” and include whether recycled paint products or paint products containing recycled content of raw materials would be covered as a salvaged and/or reused product.

4. Materials and Resources - Optimized Building Products (New Construction; Commercial Interiors; Core and Shell)

The figure (Figure 1) provided in this credit category provides an informative grid on how product certification documentation provides points across the key impact areas valued within LEED v5. This figure lists both multi-attribute certification programs as well as single attribute programs. However, not all available certification programs currently used across various industries are included. One example is the International Sustainability and Carbon Certification (ISCC) and other multi-attribute programs that may currently be in development. As such, ACA requests that USGBC provide guidance on how other certifications and multi-attribute programs not listed in Figure 1 could be considered as Eligible Product Documentation programs and seek inclusion into LEED v5.

The Optimized EPDs listed in Figure 1 only allow credits to be earned for the climate health impact area; however, optimized EPDs could also address other impact areas like human health. Furthermore, it is unclear on these credits are gained under those impact areas, and if merely having an optimized EPD is sufficient. ACA recommends that USGBC provide further clarification on the Optimized EPDs for Tier 1 and Tier 2 and how credits are gained under the impact area of climate health and whether points could be gained under other impact areas as well, such as human health.

Additionally, ACA requests USGBC include a “Material Inventory” as a single attribute under the Optimized Building Products, to serve as a pathway to showcase product content while protecting proprietary information. In LEED v4.1, companies were able to provide a Manufacturer Inventory and/or material ingredient report to gain credit in this credit category. This opportunity is no longer present in LEED v5.

Furthermore, under “Option 2: Optimized Product Categories,” it states that “Any single product category that includes more than 200% of optimized products is eligible for 1 [one] exemplary performance point. ACA requests that USGBC reconsider this phrase to determine if this is an error and is meant to be points rather than a percentage. If this is intended to be a percentage, ACA asks that USGBC either

continue to use a point-based system in this section or provide clarification on how a product category could include 200% of optimized products.

Additionally, ACA recommends that USGBC include how percentages of recycled content or bio-based content in Figure 1 translates into points.

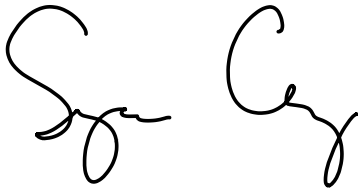
5. Materials and Resources - Construction and Demolition Waste Diversion (New Construction; Commercial Interiors; Core and Shell)

This credit category aims to reduce construction and demolition waste disposed of in landfills, incineration facilities, and environmental impacts resulting from manufacturing new materials. Within this credit category, there is a threshold of diverting at least 35% of waste through various strategies including manufacturer take-back programs. This section does state that the targets include materials like carpet, ceilings, gypsum board, and furniture. ACA asks USGBC to provide further clarification if this section is strictly limited to the materials listed or if other products, like paints and coatings could also be included. Proper management of unwanted paint used during construction, maintenance, and pre-demolition represents a substantial waste diversion and recycling opportunity. Currently, PaintCare, ACA’s subsidiary, operates paint stewardship programs covering 30% of the US population in eleven states and the District of Columbia — and continues to expand. In these programs, the share of latex paint collected that is recycled back into paint products exceeds 70%. ACA requests that the term paint take-back programs be included as a manufacturer take-back program that qualifies within this credit category.

6. Conclusion

In conclusion, ACA appreciates the opportunity to provide comments on this. This letter serves to consolidate these comments which were submitted online through USGBC’s credit library under the indicated rating systems and credit categories.

Sincerely,



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