

NLBMDA petition for Eco-Standard/Eco-Label

As a lumber-producing member of the NLBMDA's Manufacturers and Services Council, we would like to solicit your support for our petition before the American Lumber Standards Committee (ALSC).

Background

One year after the Lumber Building Materials Institute (LBMI) of the NLBMDA requested the American Lumber Standards Committee (ALSC) to consider establishing an eco-forest standard and corresponding eco-label (grade stamp), the question has yet to come before the full ALSC Board.

In response to our petition, ALSC President, Tom Searles, requested NLBMDA respond to the following and report back to the ALSC:

- (1) Demonstrate broad based interest in the development of an eco-forest standard and associated eco-label/grade-stamp.
- (2) If broad based interest exists, engage the various existing certification schemes in discussion to see if there is willingness on the part of some or all to work together to define a standard for eco-label/grade-stamp softwood lumber.

Two leading industry associations, the National Association of Home Builders (NAHB), and the Structural Building Component Association (formerly WTCA, the truss industry), have joined with the NLBMDA in support of development of official ALSC eco-standard/eco-label covering dimensional lumber from sustainable forests. While individual companies have in some cases been reluctant to publicly advocate for ALSC standard (given history of environmental activism), we can unequivocally state that no home-owner, builder, or retail building materials supplier, has indicated they hold "no interest" in development of official ALSC eco-standard/eco-label.

While the NLBMDA/LBMI petition is on behalf of the lumber **consuming** public, we recognize producers of lumber command a critical role our supply channel. As your customers, we would like to explain why we believe this initiative is in the best interests of our customers and the industry. In turn, we seek to understand what issues/concerns producers may have with development of an ALSC eco-standard.

Assumptions/Questions

From the point of view of NLBMDA, this petition is not in response to any of the existing voluntary and proprietary certification schemes, except to note that after more than fifteen (15) years of on-going and often volatile positioning, the lumber consuming public does not have a consistently reliable and cost-effective certification – a market solution. In fact, a 1942 Consent Decree prohibits the NLBMDA or member associations from endorsing or promoting any proprietary grade or standard.

It is our belief an unbiased voluntary industry standard, developed and overseen by the American Lumber Standards Committee, best ensures the lumber consuming public of consistent, defined, and well-marked (transparent) eco-lumber. The eco-standard/eco-label would be a "process" certification, not unlike the ALSC's heat-treated or chemical treated standards. We know from experience ALSC certification is cost-effective.

As with the ALSC's Lumber Grade Rules, we do not expect adoption of ALSC Eco-Standard will diminish competition among lumber producers. In the 1950s, when the regional grading agencies (WWPA, SPIB, etc) subsumed themselves to the ALSC's National Grade Rules, those agencies sought and achieved accreditation as ALSC certification agencies. We assume most, if not all, existing eco-certifiers would seek accreditation as certification agencies for new ALSC eco-standard.

What percent of your lumber production currently comes from sustainable forests (certified by a third-party)? What percent do you anticipate five years from now?

Chain of custody will surely be required from forest of origin to point of production. Once milled into lumber, a permanent (agency certified) grade-stamp/eco-label on product will document compliance with ALSC eco-standard -- as the grade stamp designates compliance ALSC Grade Rules today. Note: the presence of grade stamp does not eliminate market labels as long as they are positioned 6+ inches from the official grade stamp.

The plastics and aluminum industries have achieved substantial public success with their re-cycle labels – even though life-cycle analysis of their products is likely less sustainable than lumber. NLBMDA members want to promote the renewable and sustainable qualities of lumber. We believe this is best achieved by a simple, universally understood, grade-mark or symbol within the official grade-stamp. *Do you think a simple symbol could be used (in conjunction with agency grade-stamp) to promote sustainable lumber?*

Will your organization “demonstrate interest in development ALSC eco-standard and associated grade stamp” – Searles first criteria? What is the best way for NLBMDA to put this question to all producers?

On criteria #2, “engage the various existing certification schemes in discussion to see if there is willingness on the part of some or all to work together to define a standard for eco-label/grade-stamp softwood lumber”, *will you encourage your third-party certifier to work with the ALSC?*

Thank you for your consideration.

Michael P. O'Brien, CAE
President
National Lumber & Building Material Dealers Association
2025 M Street, NW, Ste. 800
Washington, DC 20036-3309
202.367.1280
202.367.2280 fax
mike@dealer.org
www.dealer.org