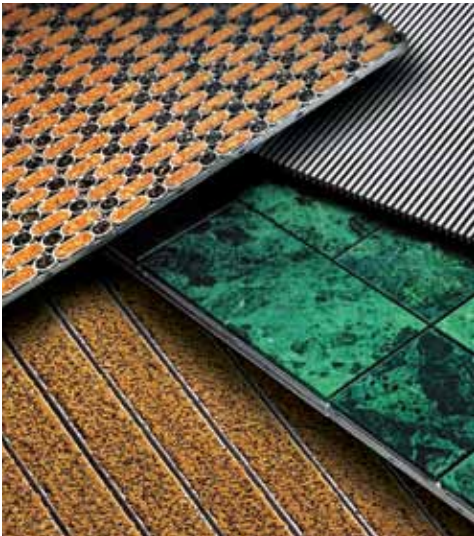




Green Buildings Need Safer Chemicals Policy Reform



At Construction Specialties (C/S), protecting the environment is a journey, not a destination. Our commitment is to create products that lower the environmental impact on the buildings they become part of and to conduct business in manner that endeavors to have no negative impact on our environment. Our environmental strategy consists of four fundamental parts. We seek to coexist with the natural ecosystems by fostering nature at all of our facilities. We minimize impacts by choosing environmentally-friendly materials and procedures that strive for no adverse impacts. We preserve our natural resources by creating durable, long-lasting products. And we partner with other leaders—including our customers, professional organizations and other companies—that share our passion for a healthy environment.

Managing Chemicals in Products

The demand for environmentally responsible and relevant building products is growing rapidly. Building owners, architects, contractors and building occupants are selecting products made with chemicals that have low to no toxicity and that are integrated into new products at the end of their life cycle. Central to our environ-

mental strategy is using chemicals that are inherently safer for humans and the environment. At C/S, we adopted four primary guiding principles as the foundation of our Chemicals Policy.

1. Know chemical ingredients in products and disclose chemicals of high concern.

Awareness of materials chemistry and the associated health affects is rapidly expanding within our market sector. For most building products, aside from a simple 2 X 4, materials chemistry is inescapable. Consumers are aware of the effects of chemicals in off-the-shelf products and make their purchases accordingly.

We know the chemicals used in our manufacturing processes and seek to know all the substances used in our products down to 100 parts per million. And we increase as appropriate the transparency of the chemical constituents of our products, including public disclosure of chemicals of high concern and 3rd-party certification(s).

2. Assess chemical toxicity and avoid hazardous chemicals in manufacturing and products.

We determine to the fullest extent possible, given limited avail-

able data, the hazard characteristics of chemical constituents and formulations in our products. Then we select chemicals with inherently low hazard potential, strive to avoid chemicals of highest concern, minimize exposure when hazards cannot be prevented and redesign

Construction Specialties develops and manufactures architectural building products for non-residential construction.

- Privately owned U.S. company
- Headquarters—Lebanon, NJ
- Manufacturing at 30 locations in 19 countries
- Worldwide revenues of \$300 million
- Staff of 1,600
- 13 Cradle to Cradle certified products
- Eliminating PVC and PBTs from all products, starting with Acrovyn Wall Protection products for North America



products and processes to avoid the use and generation of hazardous chemicals.

Minimizing the health and environmental impacts of chemicals is now embedded into the building industry's best practices such as Green Guide for Health Care, Collaborative for High Performance Schools (CHPS), LEED and Practice Green Health. These consensus-based best practices have expanded beyond the early concerns about the off-gassing of chemicals to further reducing exposure by eliminating PBTs and other chemicals of high concern. They reject toxic additives that make plastics flexible or to meet fire codes and disqualify concrete made with fly ash from a hazardous waste incinerator.

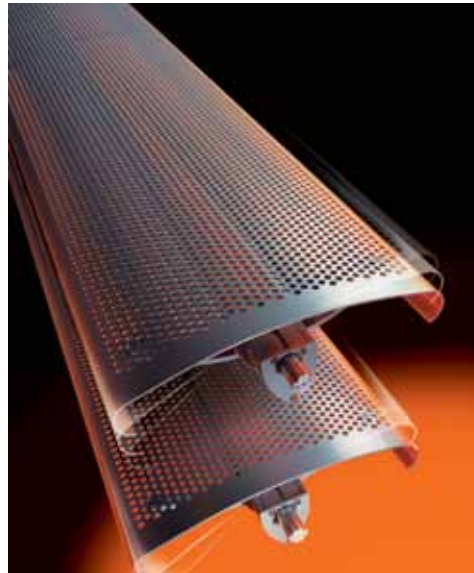
Over the past 15 years our R&D focused on making manufacturing and products more sustainable. In our manufacturing facilities we are significantly reducing VOCs (volatile organic compounds) by converting to powder-coat finishes for our aluminum components and using water-based stains in lieu of petro-based stains. Our Entrance Flooring Systems are designed to keep dirt and particulates out of buildings, improving indoor air quality and eliminating the use of harmful cleaning chemicals. We re-engineered our entire Acrovyn® Wall Protection product line to completely eliminate all PVC and PBTs (persistent, bioaccumulative toxic chemicals) from its formulation.

3. Commit to continuous improvement.

At C/S we've incorporated our chemical policy principles into our ISO 14001 structure and audit ourselves for ongoing compliance with moving to safer chemicals in our products.

4. Finally, we support public policies and industry standards that advance the implementation of the above three principles,

ensure that comprehensive hazard data are available for chemicals on the market, take action to eliminate or reduce known hazards and promote a greener economy, including support for green chemistry research and education.



Safer Chemicals Policy Reform Complements Green Building Market Movement

Chemicals policy reform, if done right, will support the market movement to safer alternatives to toxic chemicals in products.

- **Comprehensive hazard and toxicity data for all chemicals on the market.** Downstream users often confront the dilemma of seeking to move away from a chemical of high concern, only to find that little is known about the alternatives. Comprehensive information on all chemicals is essential to avoid the mistake of “regrettable substitutions” —switching from known problematic chemicals to chemicals that will be identified as problematic once all the data are available.
- **Greater disclosure of chemicals of high concern in products.** Specifiers and buyers are needlessly spending too much time trying to find answers about the chemicals in the products they buy. For example, C/S has spent quite a bit of time determining the presence of PBTs in our products. Safer chemicals reform should require companies using chemicals of high concern in products to disclose their presence to customers and the public as well as to government. Such a requirement will directly address a significant barrier to implementing green chemistry

at the user level: the lack of information on the chemical constituents in products.

- **Prioritize chemicals of high concern for early action.** PBTs and chemicals like the phthalates (such as DEHP) and polybrominated diphenyl ethers (PBDEs) need to be prioritized for early action. Markets are moving away from these chemicals and government action can assure that we all have a level playing field to operate from. Increasingly, we incur reputational risks and a large financial burden for controlling and supervising the use of these chemicals throughout our supply chain.
- **Promote safer alternatives.** The U.S. Environmental Protection Agency (EPA) needs to expand and intensify its efforts to promote safer alternatives. Green chemistry research should be prioritized and policy incentives developed to promote and facilitate the use of safer chemicals over those with known health hazards.

Congress, along with the building sector, has an opportunity to improve indoor air quality and thereby human health and the environment through the greater use of inherently safer chemicals in building products.