

To Whom It May Concern:

Thank you for providing an opportunity to comment on the U.S. Green Building Council's (USGBC) third public revision to the Leadership in Energy and Environmental Design (LEED) Materials and Resources credits and the USGBC Forest Certification Benchmark. The Institute of Forest Biotechnology would like to provide the following comments regarding the proposed revisions.

The Institute of Forest Biotechnology (IFB) is a non-profit organization and the only one to address the sustainability of forest biotechnology on a global scale. The IFB manages the largest partnership of forest biotechnology professionals as well as a number of initiatives that bring together diverse stakeholders to advance the science, dialogue, and stewardship of these technologies.

The IFB believes that when used responsibly, modern biotechnologies can be applied to develop trees that address environmental and social needs. Genetically engineered forest trees (biotech trees) may one day give us the ability to protect forest ecosystems from invasive threats, provide more fiber and fuel from fewer inputs, use fewer chemicals to manufacture wood products, and store more carbon. While there are currently no commercial biotech forest trees in the U.S. today, national goals calling for unprecedented amounts of bio-based energy, renewable material, and carbon sequestration make it important to consider biotech trees. USGBC continues to be thorough in its assessment of forest certification benchmarks. The IFB encourages this continued focus with appropriate attention to social and environmental benefits.

Annex III of the Cartagena Protocol alone will not assure that biotech trees are used responsibly

In 2003, this annex set international precedence for a risk assessment protocol of living modified organisms, including biotech trees. This annex is necessarily general in its focus and applicability to all genetically modified organisms including biotech trees. When the purpose is to assure that these trees are used responsibly, the IFB recommends following the Responsible Use: Biotech Tree Principles. The following points highlight why USGBC's Prerequisite/Credit Number Sp10 should require being in accordance with the Responsible Use Principles in addition to adherence to risk assessment principles such as the Cartagena Protocol's Annex III.

- Annex III does not address stewardship requirements specific to a particular product, such as biotech trees. The Responsible Use Principles specifically address the stewardship of biotech trees.
- Annex III looks only at risks of using genetically modified organisms. Benefits to society and the tradeoffs between the risks and benefits are not considered.
- Not all risks are fully considered by Annex III. The risks of *not* using genetically modified organisms such as biotech trees are absent from all Annex III analyses.
- The U.S. and Canada have not ratified the Cartagena Protocol so using it as a requirement where commerce is involved in the U.S. or Canada may have trade implications.

We do not have the luxury of time when so many social and environmental needs are upon us

Trees require many years, sometimes decades, to mature and produce the next generation of offspring. Conventional breeding is a critical technology to encourage, as are responsible forest biotechnology programs. Modern biotechnology gives us a tool that may address some of the negative effects of population growth, a changing climate, and unsustainable resource use. Likewise, it is imperative that USGBC address the particular aspects and abilities of biotech trees in responsible, yet timely ways so that society and the environment may benefit sooner rather than later. Management that adapts over time and is tailored to the needs of society and our changing environment are also encouraged by the IFB.

We encourage practices that increase assurance that biotech trees are being used responsibly

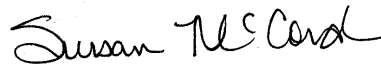
Forest stewardship and public assurance of performance are critical components of LEED. Programs should robustly incorporate practices tailored to biotech trees. The public is justified in asking questions about these trees. All organizations involved in forest biotechnology, including USGBC through its Forest Certification Benchmark, should engage with stakeholders to answer these questions whenever possible. Through the Responsible Use: Biotech Tree Principles, the IFB is working to establish a transparent set of stewardship principles, educational information, and a website (responsibleuse.org) as resources for using biotech trees responsibly. We encourage USGBC to use any information from this initiative that can assist in aligning societal and environmental needs with biotech tree use. We also invite USGBC to participate in the development of the Responsible Use Principles for biotech trees.

Thank you for your consideration of these comments. In addition, the Institute of Forest Biotechnology is available as an independent entity to provide any additional information you need.

Thank you,



Adam Costanza
President
Institute of Forest Biotechnology



Susan McCord
Executive Director
Institute of Forest Biotechnology