

GG208-14

505.2.4

Proponent: Mark Nowak, representing Steel Framing Alliance

Revise as follows:

505.2.4 ~~Bio-based materials~~ Wood and wood products. ~~Bio-based materials shall be those materials that comply with one or more of the following:~~

- ~~1. The bio-based content is not less than 75 percent as determined by testing in accordance with ASTM D 6866.~~
2. Wood and wood products used to comply with this section, other than salvaged or reused wood products, shall be labeled in accordance with the SFI Standard, FSC STD-40-004 V2-1 EN, PEFC Council Technical Document or equivalent *fiber procurement system*. As an alternative to an on-product label, a Certificate of Compliance indicating compliance with the *fiber procurement system* shall be permitted. Manufacturer's *fiber procurement systems* shall be audited by an accredited third-party.
- ~~3. The requirements of USDA 7CFR Part 2902.~~

Reason: Section 505.2 addresses materials generically except Section 505.2.4, which is specific to bio-based products. The existing text would permit materials, by virtue of Section 505.2.4, to comply simply because they are defined as a bio-based product.

Being a bio-based material in itself does not make a product green or sustainable. The other requirements in this section are based on attributes that can be connected to verifiable sustainability outcomes such as recycled content or lower emissions due to reduced transportation distances. However, the addition of bio-based materials for compliance is a procurement preference established by the Federal Government. It does not increase sustainability by using these products.

Reference to the USDA Standard or its rationale is inappropriate in a building code. The Federal government's decision to declare bio-based materials as preferable for procurement purposes does not make those products any more green. Bio-based products should have to meet the same requirements in Sections 502.2 as other materials. This proposal achieves that objective while maintaining the requirements for wood products used for framing and other applications in buildings.

Cost Impact: Will not increase the cost of construction

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