

LEED v5 Comment Template
The Deadline to Submit Comments is May 20, 2024

Below are suggested comments that can be, if you choose, cut and pasted directly into the LEED v5 comment box for *Green Cleaning* and, separately, *Equity within Operations and Maintenance Staff* sections (we urge you to comment on both sections). USGBC has asked that comments for each of these sections be entered separately by corresponding section.

We have also provided a discussion at the bottom of this document that includes more ideas to stimulate your thinking about additional comments you can include, at your discretion, in your own words. Please, at a minimum, include (in your own words or cut and paste from this document) the Primary Comments for the two sections. If you are including your own additional comments, it is easiest to draft them in a Word document and paste them into the comment box. To help us monitor our progress, please send your comments to ISSA at LEEDcomments@issa.com.

Primary comments for Green Cleaning Section

My name is _____ and my comments represent the _____ company, a (facility service provider/distributor/manufacture/labor union/etc.) regarding the Proposed LEED O+M: Existing Buildings v5 draft. Specifically, our comments address the Green Cleaning and the Equity Within Operations and Maintenance Staff elements. We are deeply concerned that the standards proposed in these elements are a setback for the entire global cleaning industry and understates the importance of cleaning to protect occupant health and wellbeing.

Please consider our concerns and recommendations noted below:

Restore the Prerequisite:

- *Comment:* The draft has deleted the prerequisite and has not integrated those critical program management requirements elsewhere into the Rating System. Appropriately managing the cleaning process, use of products and equipment, strategies to reduce energy and other resources, training and contingency planning for workers, education on handwashing and other issues are essential to protecting occupant health and wellbeing.
- *Recommendation:* We recommend the Prerequisite be restored to ensure that organizational, planning and training standards be required of all facilities seeking LEED certification. These requirements are particularly critical to successful cleaning programs.

Weighting – Cleaning is undervalued

- *Comment:* Overall, too few points are allotted to Green Cleaning programs, particularly in comparison to other program/building attributes. While 3 points may be appropriate during construction, it undervalues the importance of cleaning (after the building is occupied) and the need to protect occupant health and wellbeing.

- *Recommendation:* We recommend increasing the credits for Green Cleaning to 10 points and using the additional points to incentivize a level of thorough cleaning that will reduce risks to occupant health while improving their productivity and wellbeing

We respectfully request that USGBC seriously consider these comments and update the proposed standard to better meet the needs of the global cleaning industry.

Primary comment for Equity within Operations and Maintenance Staff Section

My name is _____ and my comments represent the _____ company, a (facility service provider/distributor/manufacture/labor union/etc.) regarding the Proposed LEED O+M: Existing Buildings v5 draft. Specifically, our comments address the Green Cleaning and the Equity Within Operations and Maintenance Staff elements. We are deeply concerned that the standards proposed in these elements are a setback for the entire global cleaning industry and understate the importance of cleaning to protect occupant health and wellbeing.

Please consider our concerns and recommendations noted below:

- *Comment:* The social equity element is not tailored to the needs and working conditions of cleaning personnel, landscapers, pest applicators, parking attendants, and other employees and contract workers in the building.
- *Recommendation:* The social equity requirements in the Prerequisite should be better tailored to address the needs of cleaning teams, including but not limited to fair wages, gender discrimination, working conditions, injury and illness prevention, opportunities for advancement, etc. The social equity requirements should also encompass safety provisions for cleaning personnel and be more effectively tailored to meet the needs of cleaning and other contracted workers. This includes addressing wages, production rates, hours, benefits, injury rates including ergonomic injuries, tenure of frontline workers, worker insurance, immigration status, encouraging the hiring of people with disabilities and other marginalized people, etc.; in addition to the typical social equity concerns (e.g., no child or slave labor).

We respectfully request that USGBC seriously consider these comments and update the proposed standard to better meet the needs of the global cleaning industry.

This last section provides some additional ideas to consider for adding comments. At your discretion, please think about these ideas and draft comments in your own words (please do not cut and paste these directly into your comments).

We believe that overall, the standard does not encourage innovation nor anticipate improvements in the cleaning industry (e.g., robotics and demand-based cleaning), **over the expected life span of the standard (usually about 5 years).**

We encourage you to consider the following (feel free to comment on the things that are important to you!):

- Comment on innovative product recommendations that are not currently addressed in the Rating System (e.g., robots, occupancy sensors for demand-based cleaning, etc.).
- Products not covered (e.g., floor pads, mops, buckets, etc.).
- Extended product responsibility (takeback programs).
- Products and processes to reduce the consumption of products, energy and water, and reduce waste.
- Encourage products that are dematerialized, durable, repairable, reusable, etc.
- Eliminating the closed-loop loophole in GS-37 and UL2700 allowing some cleaning chemicals to be tested at use-dilution which can mislead purchasers about the toxicity of the product.
- Requiring Greenhouse Gas calculations for products on top of Green Seal, UL, Safer Choice and other similar product standards.

Feel free to expand on these comments. For example, how the elimination of the Prerequisite sets back the Rating System to its pre-2009 version when the Prerequisite was first included. Also, including additional information especially discussing the scientific research that identifies the benefits of cleaning would be helpful.

Our goal (and tone) is to be helpful to the USGBC as we are the experts on cleaning. Beyond just stating the issue or rationale for your recommendation, include specific language that can be inserted in LEED.

Consider adding examples such as the 3 points for all of cleaning, disinfecting and sanitizing is currently equal to conducting a single survey of occupant attitudes requiring only 15% of the occupants to respond. Or the 3 points for all of cleaning, disinfecting and sanitizing is currently equal to a one-time sampling of indoor air quality. More examples are available in the slide deck.

It may be helpful to recognize that the current social equity language is appropriate for eliminating problems throughout the supply chain especially when the products are being mined or manufactured in developing countries. However, you might comment that in LEED for Existing Buildings, priority should be given to the issues that LEED projects can directly and immediately address such as the requirements for the workers either employed by the building or their contractors. And consider any specific information to help LEED projects select cleaning contractors that appropriately address the social equity needs of their workers.

We have a goal to submit 1,000+ comments from around the globe. So please share this document with colleagues and customers encouraging them to submit comments as well!