California Air Resources Board, Sacramento, CA

The role of Environmental Product Declarations (EPDs) in embodied carbon policies

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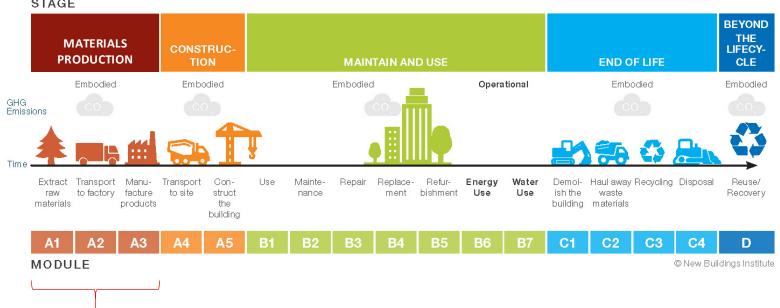
Head, Industrial Sustainability Analysis Laboratory

Faculty Scientist, Lawrence Berkeley National Laboratory

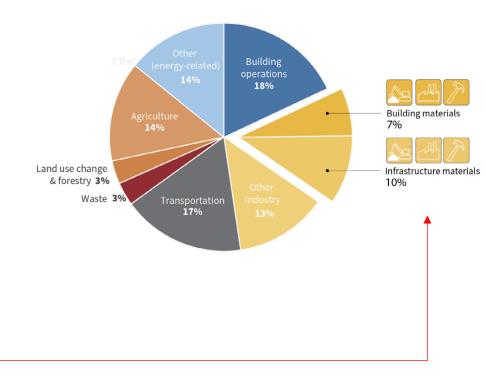
Decarbonizing construction materials is key to a net-zero future

FIGURE 1: LIFECYCLE STAGES Data source: BS EN 15978:2011

STAGE



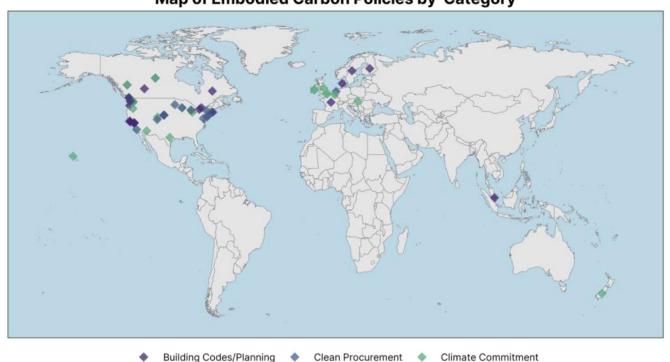
Global GHG emissions by sector (2019)

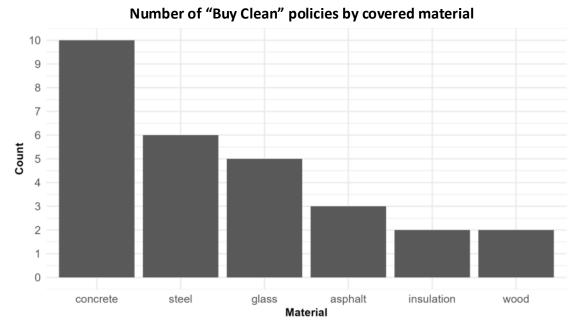


Sources: Carbon Leadership Forum (2024). Embodied Carbon 101. https://carbonleadershipforum.org/embodied-carbon-101-v2/ and Benke, B., Roberts, M., Shen, Y., Carlisle, S., Chafart, M., and Simonen, K. (2024). The California Carbon Report: An Analysis of the Embodied and Operational Carbon Impacts of 30 Buildings. Carbon Leadership Forum, University of Washington. Seattle, WA. http://hdl.handle.net/1773/51287; adapted from New Buildings Institute (2024). https://newbuildings.org/code_policy/embodied-carbon/

Policies are emerging worldwide to tackle "embodied carbon" ...

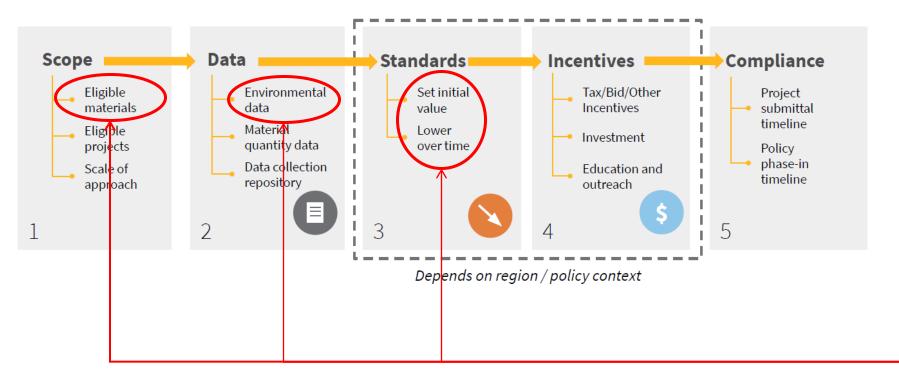
Map of Embodied Carbon Policies by Category

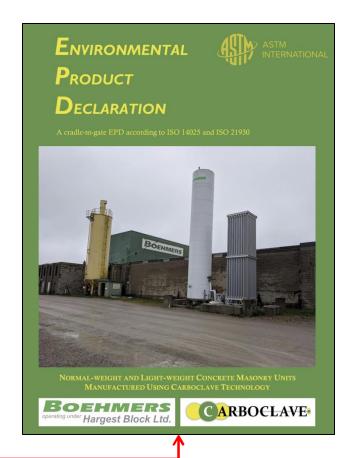




... many of which require EPDs for compliance and implementation

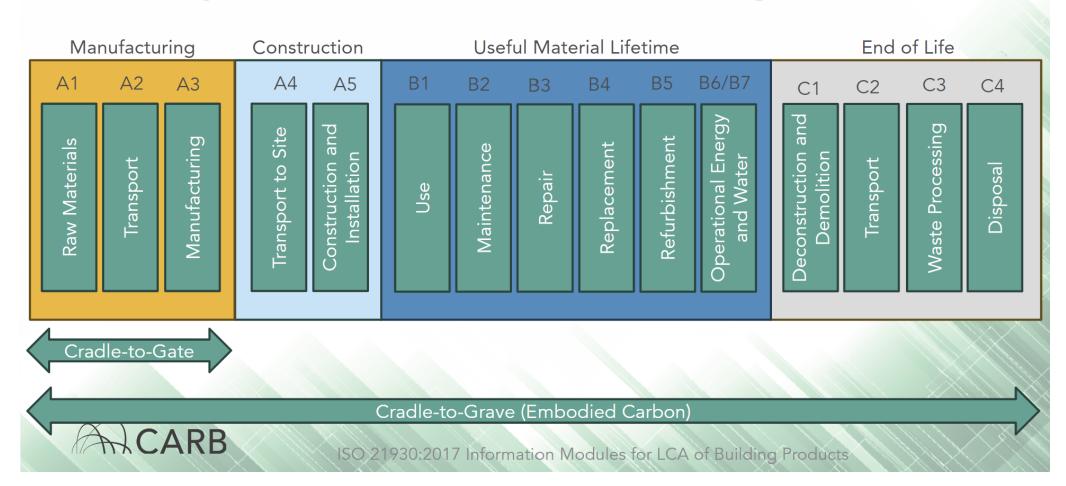
Major stages and elements of "Buy Clean"/embodied carbon policies





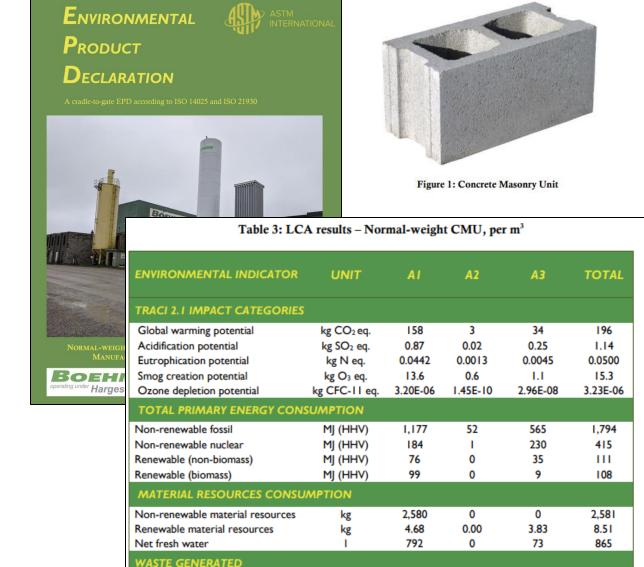
Understanding the nomenclature

Life-Cycle Assessment of Building Materials



What is an EPD?

- EPDs communicate standardized environmental information about a product
- Subject to international life-cycle assessment (LCA) standards
- For building materials, current reporting is mostly limited to "cradle to gate" (A1-A3)
- Subject to third-party review and verification
- May contain additional information at the producer's discretion



kg

0.3

0.006

Non-hazardous waste generated

Hazardous waste generated

40.6

0.111

41.0

0.117

0.0

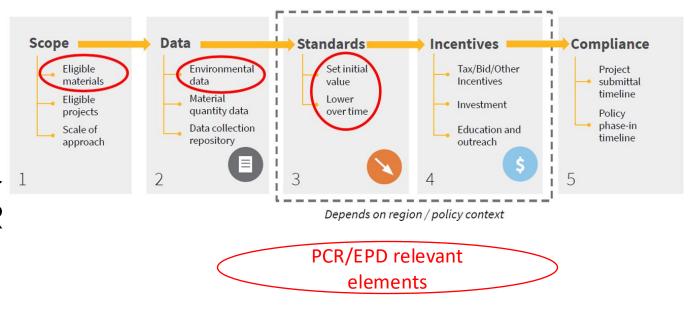
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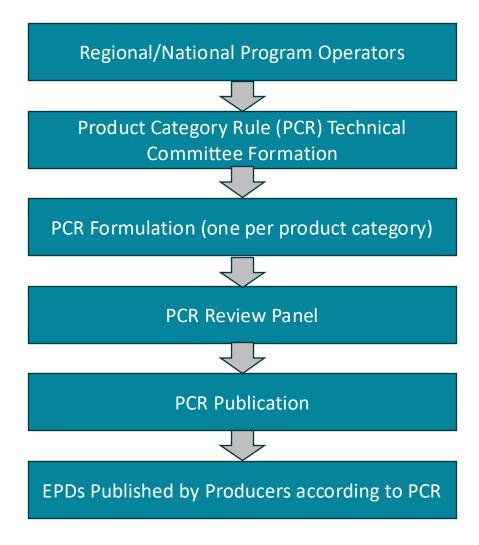
PCRs/EPDs are proliferating, but can they be improved?

Key research questions

- How up-to-date are the "embodied carbon" values reported in an EPD?
- 2. How clearly is data quality communicated?
- 3. How often are production practices reported?
- 4. What is the role of regulator and/or policymakers in PCR development?
- 5. What are best practices for future EPD requirements?

Major stages and elements of "Buy Clean" / embodied carbon policies





Regional/National Program Operators

Dozens of Program Operators worldwide

AENOR

Industry: Building & Construction Materials Location: Spain

Website

Bau-EPD

Industry: Building & Construction Materials Location: Austria

Website

Construction Materials Location: UK

Website

DAP Habitat

Industry: Building & Construction Materials Location: Portugal

Website

EPD Belge

Industry: Building and Construction materials Location: Belgium

Website

EPD Italy

Industry: Building and Construction materials Location: Italy

AFNOR

Industry: Building & Construction Materials Location: France

Website

BRE

Industry: Building &

DAPCO

Industry: Building & Construction Materials Location: Chili

Website

EPD Denmark

Industry: Building and Construction materials Location: Denmark

Website

EPD Norge

Industry: Building and Construction materials Location: Norway

ASTM

Industry: Building & Construction Materials Location: USA

Website

Forum

Carbon Leadership

Industry: Building & Construction Materials

Location: USA

Website

EDF Taiwan

Industry: B&C, machinery & equipment, transport Location: Taiwan

Website

EPD India

Industry: Building and Construction materials Location: India

Website

EU PEF

Industry: Multiple Location: EU

Australasia EPD

Industry: Uses Environdec Location: Australia/NZ

Website

CSA

Industry: Building & Construction Materials Location: USA

Website

Environdec

Industry: B&C, Food and beverage, Electricity, other Location: Sweden

Website

EPD Ireland

Industry: Building and Construction materials Location: Ireland

Website

FP Innovations

Industry: Wood Products

Location: USA

Regional/National Program Operators



Product Category Rule (PCR) Technical Committee Formation



Product Category Rule for Environmental Product Declarations

PCR for Portland, Blended, Masonry, Mortar, and Plastic (Stucco) Cements



Program Operator NSF International

NSF International National Center for Sustainability Standards Valid through March 31, 2025

ncss@nsf.org
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APPENDIX A: TECHNICAL REVIEW COMMITTEE

The following individuals participated in the review committee from June 2019 through March 2020.

Manufacturers

- Hamid Farzam, Cemex
- Shawn Kalyn, Votorantim / St. Marys Cement LLC
- Kirk McDonald, CalPortland
- Adam Swercheck, Heidelberg Technology Center
- Cheng Qi, Ash Grove Cement / CRH

Trade Associations

- Adam Auer, Cement Association of Canada
- Jamie Farny, Portland Cement Association

Users

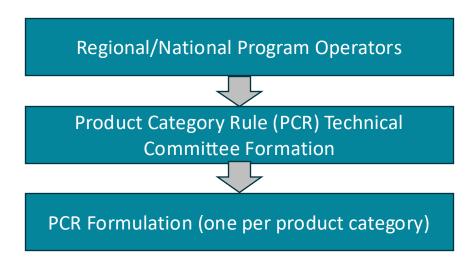
- James Bogdan, National Ready Mixed Concrete Association
- David Green, BASF Corp.
- Emily Lorenz, Precast / Prestressed Concrete Institute
- Martha VanGeem, Consultant

LCA Expertise

- Jamie Meil, ATHENA Sustainable Materials Institute
- Eric Masanet, Northwestern University

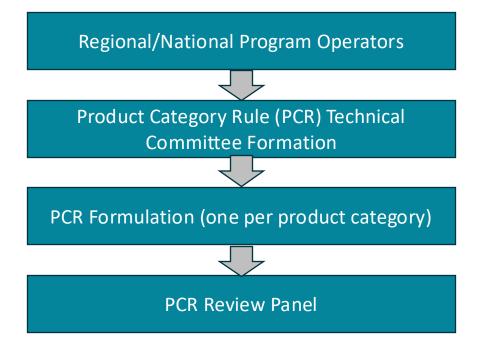
NSF

Andrea Burr



Typical PCR scope and contents

| CC | DNTENTS | |
|----|---|-----|
| 1 | SCOPE | 6 |
| | | |
| 2 | NORMATIVE REFERENCES | 7 |
| 3 | TERMS AND DEFINITIONS | 8 |
| 4 | ACRONYMS AND ABBREVIATED TERMS | 10 |
| _ | OFNER MARKETS | 4.0 |
| 5 | GENERAL ASPECTS | |
| | 5.2 Life cycle stages | |
| | 5.3 Average EPDs for groups of similar products | |
| | 5.4 Use of EPDs for construction products | 12 |
| | 5.5 Comparability of EPDs for construction products | |
| | 5.6 Documentation | 13 |
| 6 | PCR DEVELOPMENT AND USE | 13 |
| 7 | PCR FOR LCA | 13 |
| | 7.1 Methodological framework | |
| | 7.2 Inventory analysis | |
| | 7.3 Impact assessment indicators describing main environmental impacts derived from LCA | 20 |
| 8 | ADDITIONAL ENVIRONMENTAL INFORMATION | 21 |
| Ü | | |
| 9 | CONTENT OF AN EPD | |
| | 9.1 General | |
| | 9.2 Declaration of general information | |
| | 9.3 Declaration of methodological framework | |
| | 9.5 Declaration of technical information and scenarios | |
| | 9.6 Declaration of additional environmental information | |
| | 5.0 Declaration of adultional crivironmental miormation | 20 |
| 10 | PROJECT REPORT | 25 |
| 11 | VERIFICATION AND VALIDITY OF AN EPD | 26 |
| 12 | REFERENCES | 27 |
| | | |
| AP | PENDIX A: TECHNICAL REVIEW COMMITTEE | 29 |





PRODUCT CATEGORY RULES REVIEW PANEL

Program Operator

NSF International

Recommended for adoption by

The PCR Committee for Portland Cement

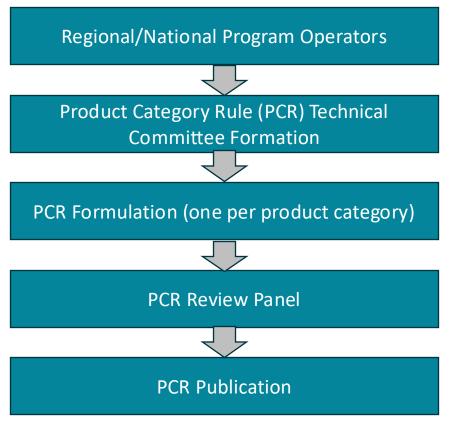
Review panel

Dr. Thomas P. Gloria, PhD Industrial Ecology Consultants 35 Bracebridge Road Newton, MA 02459-1728

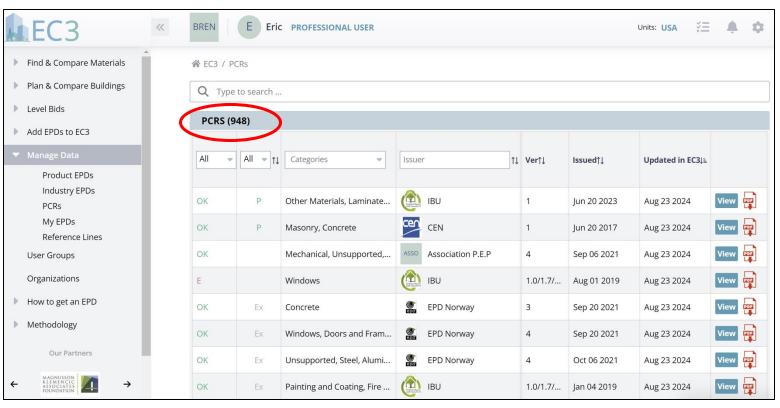
t.gloria@industrial-ecology.com

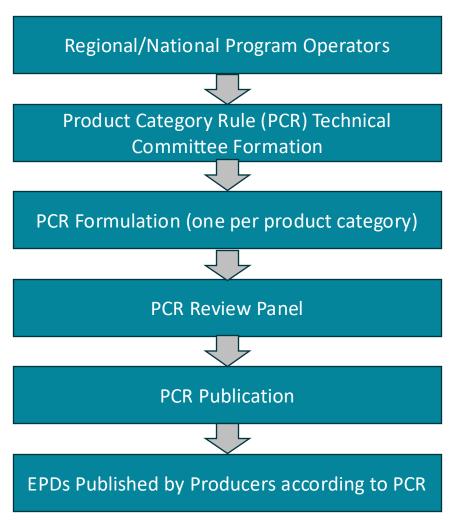
Mr. Jack Geibig EcoForm 2624 Abelia Way, Suite 611 Knoxville, TN 37931 jgeibig@ecoform.com Mr. Bill Stough Sustainable Research Group PO Box 1684 Grand Rapids, MI 49501-1684

bstough@sustainableresearchgroup.com

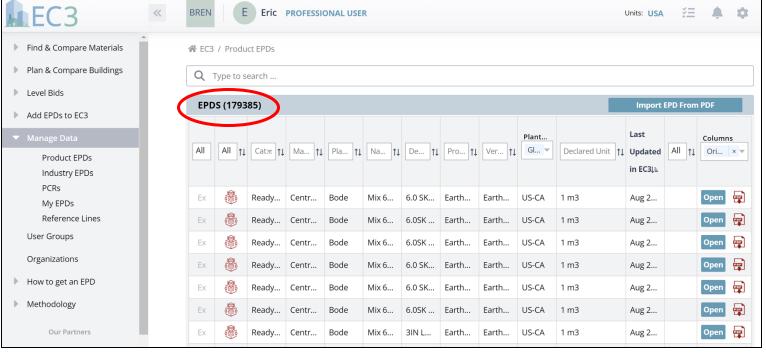


Hundreds of PCRs Worldwide

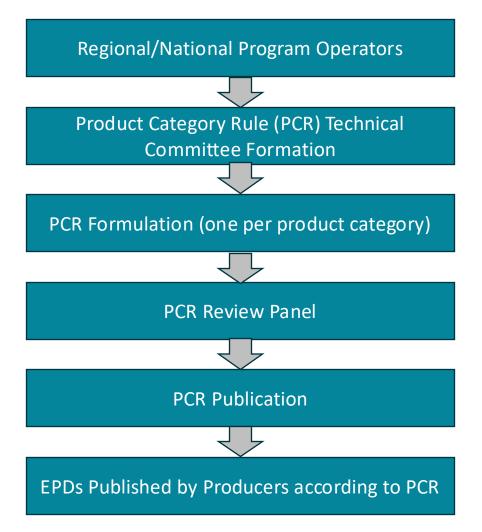


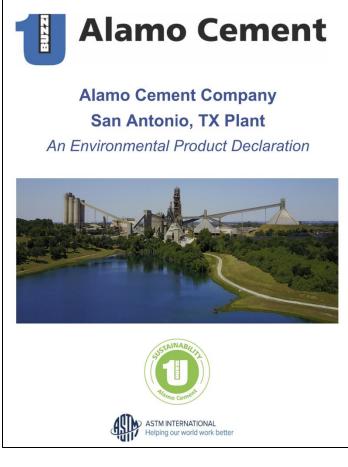


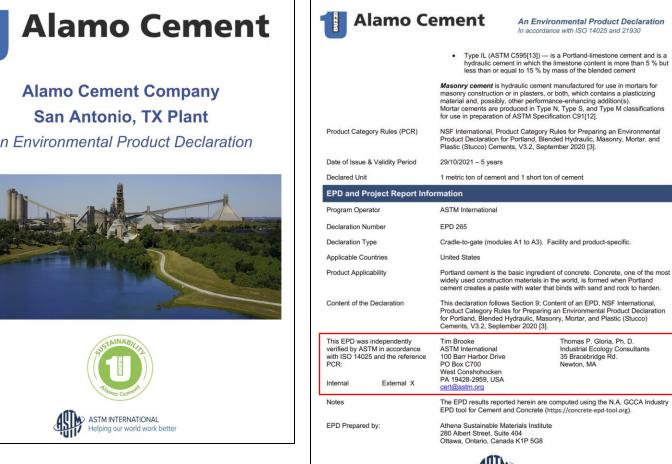
Tens of thousands of EPDs worldwide



Independent verification of EPDs







Research methods

 Initial focus limited to covered materials in California and U.S. Federal "Buy Clean" programs

| | Buy Clean Policies with Set Thresholds | | | | | | | |
|--|--|---|---|--|--|--|--|--|
| Policy | Location/ Application | Material | Threshold | | | | | |
| Buy Clean California Act ¹⁰ /L.A. Executive Directive No. 25 ¹⁶ | California Public Projects, Los Angeles City Public Projects | Structural Steel | 1,010 kg CO ₂ eq/metric ton (Hotrolled), 1,710 kg CO ₂ eq/metric ton (Hollow), 1,490 kg CO ₂ eq/metric ton (Steel Plate) | | | | | |
| | | Concrete Reinforcing Steel ("Rebar") | 890 kg CO ₂ eq/metric ton | | | | | |
| | | Flat Glass | 1,430 kg CO ₂ eq/metric ton | | | | | |
| | | Mineral Wood Board Insulation | 3.33 kg CO_2 eq/ $1m^2$ at R_{SI} = 1 (light-density), 8.16 kg CO_2 eq/ $1m^2$ at R_{SI} = 1 (high-density) | | | | | |
| U.S. Federal Buy Clean/GSA Low Embodied Carbon ¹⁷ | U.S. Federal Projects | Concrete* | 242 kgCO ₂ eq/m ³ (standard mix, lowest compressive strength up to 2499 f'c in PSI) 414 kgCO ₂ eq/m ³ (standard mix, lowest compressive strength of 6500 f'c in PSI and up) | | | | | |
| | | Steel, Asphalt, Flat Glass | 40% below average (best) 20% below average (better) "Below average" (acceptable) | | | | | |

UC SANTA BARBARA

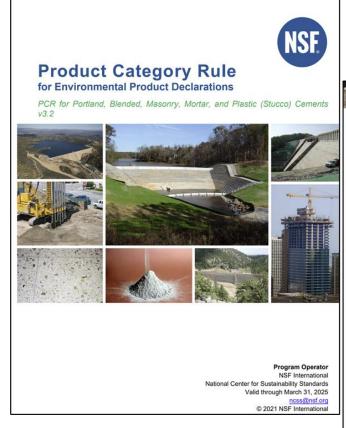
Research methods

- Initial focus limited to covered materials in California and U.S. Federal "Buy Clean" programs
- EPD database (500+)
 - Focus on:
 - BCCA and U.S. federal products
 - Producer locations relevant to California
 - Data fields
 - Common/required reporting fields
 - Additional assessment fields

| EPD content | Data tag/field |
|----------------|---|
| Declaration | Declaration number |
| information | Date of issuance |
| | Program Operator |
| | Company |
| | Product Name |
| | Product Definition |
| | Declaration Type |
| | PCR Reference |
| | Period of Validity |
| | Geographic Scope |
| | Product application |
| | Specificity level |
| Scope and | System boundary (A1, A2, A3, etc.) |
| boundaries | Declared unit (e.g., ton, m3) |
| | Are production technologies described? (Y/N) |
| | Are recycled material inputs indicated? (Y/N) |
| | Are supply chain locations/logistics documented? (Y/N) |
| Data quality | Are data quality ratings/descriptions offered? (Y/N) |
| | Temporal representativeness rating |
| | Geographical representativeness rating |
| | Technological representativeness rating |
| | Data sources (by stage) primary or secondary |
| Results by | Primary energy - total |
| stage (A1, A2, | Primary energy - renewable (MJ) |
| etc.) | Final energy use by fuel (MJ) |
| | Electricity grid mix |
| | Which LCIA characterization model(s) was/were used? (e.g., TRACI 2.0) |
| | Global warming potential (GWP) (kg CO2 eq) |
| | Ozone depletion potential (ODP) (kg R11 eq) |
| | Acidification potential (AP) (kg SO2 eq) |
| | Eutrophication potential (EP) (kg N eq) |
| | Smog formation (kg O3 eq) |
| | Abiotic depletion potential (ADP) |
| | III SANIA BARBAR |

Research methods

- Initial focus limited to covered materials in California and U.S. Federal "Buy Clean" programs
- EPD database (500+)
 - Focus on:
 - BCCA and U.S. federal products
 - Producer locations relevant to California
 - Data fields
 - Common/required reporting fields
 - Additional assessment fields
- PCR characteristics database (40+)
 - Focus on North American and major import partners
 - Process and stakeholder assessment





- 61 161 161
- Shawn Kalyn, Votorantim / St. Marys Cement LLC
- Kirk McDonald, CalPortland
- Adam Swercheck, Heidelberg Technology Center
- Cheng Qi, Ash Grove Cement / CRH

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NS

Andrea Burr

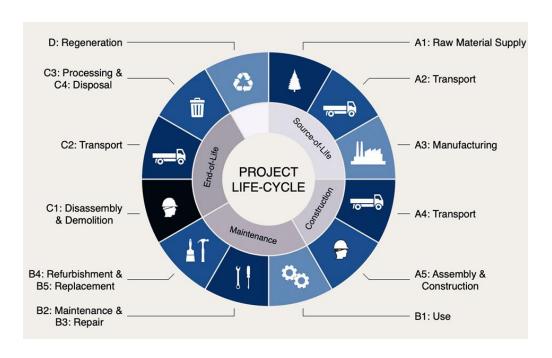
How up-to-date are EPD data?

Why it matters

- Setting initial embodied carbon thresholds
- Lowering allowing thresholds over time
- Setting threshold reduction cadence

| | | Maximum da | | |
|----------------------------|--|--------------|--------------|---------------|
| | | Primary data | | Data quality |
| Material class | Relevant PCRs | (A3/A2) | data (A2/A1) | ratings |
| Steel | UL Environment: Part B: Designated Steel Construction Product EPD Requirements (8/2020, version 2.0) | | | Encouraged |
| | SCS Global Services' PCR for Designated Steel Construction Products (5/2015, version 1.0) | | | Not addressed |
| Glass | NSF International: NGA PCR for Flat Glass: UN CPC 3711, Version 2.0 | | | Encouraged |
| Mineral wool/insulation | UL Environment, Part B: Building Envelope Thermal Insulation EPD requirements, Volume 3.0 | | | Encouraged |
| Concrete | ASTM International's PCR for Precast Concrete (5/2021, version 3.0) | 5 years | 10 years | Not addressed |
| | NSF International's Product Category Rule for Concrete (8/2021, version 2.1) | | | Not addressed |
| | UL's Part B: Concrete Masonry and Segmental Concrete Paving Product EPD Requirements (3/2022, version 1.1) | | | Encouraged |
| Cement | NSF International's Product Category Rule for Portland, Blended, Masonry, Mortar, and Plastic (Stucco) Cements (9/2021, version 3.2; or 5/2020, version 3.0) | | | Not addressed |
| Asphalt | National Asphalt Paving Association's Product Category Rule for Asphalt Mixtures, (4/2022, version 2.0) | | | Not addressed |

Building life cycle stages



Primary data = collected directly from operations

Secondary data = obtained from general LCA datasets

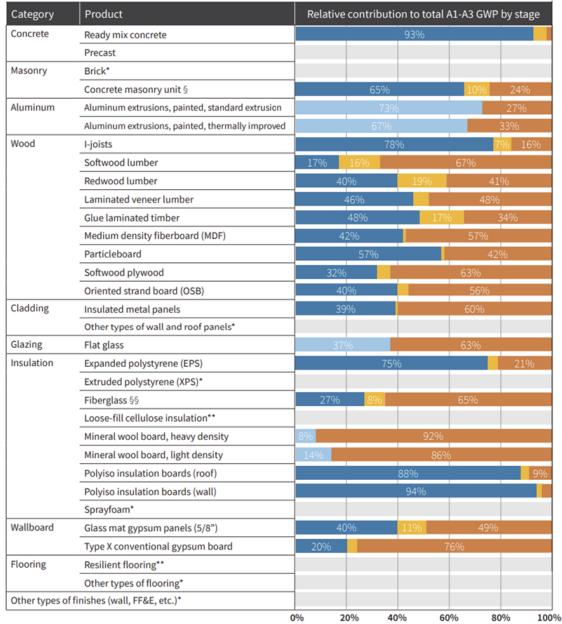
How up-to-date are EPD data?

Why it matters

- Setting initial embodied carbon thresholds
- Lowering allowing thresholds over time
- Setting threshold reduction cadence

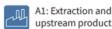
| | | Maximum da | | |
|----------------------------|--|-------------------------|---------------------------|----------------------|
| Material class | Relevant PCRs | Primary data (A3/A2) | Secondary data (A2/A1) | Data quality ratings |
| Steel | UL Environment: Part B: Designated Steel Construction Product EPD Requirements (8/2020, version 2.0) | | | Encouraged |
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| Asphalt | National Asphalt Paving Association's Product Category Rule for Asphalt Mixtures, (4/2022, version 2.0) | | | Not addressed |

Contribution of life-cycle stage by product

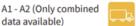


Life cycle stages













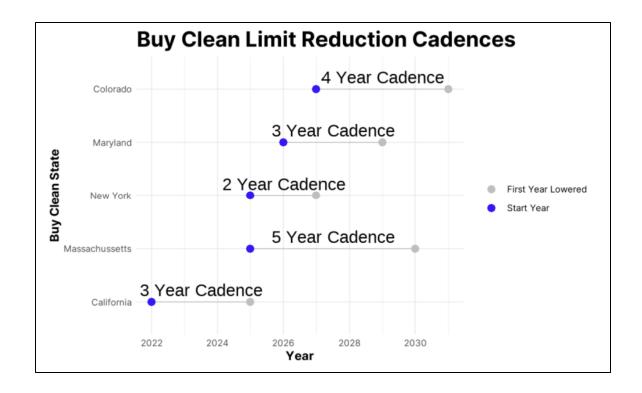
How up-to-date are EPD data?

Why it matters

- Setting initial embodied carbon thresholds
- Lowering allowing thresholds over time
- Setting threshold reduction cadence

| _ 40 | |
|------|---------|
| 5-10 | l vaarc |
| O-TC | ycais |

| | | L | | <u> </u> | | |
|----------------------------|--|---|-------------------------|---------------------------|----|--------------------|
| | | I | Maximum da | ta age | | |
| Material class | Relevant PCRs | ш | Primary data (A3/A2) | Secondary data (A2/A1) | | ta quality ings |
| Steel | UL Environment: Part B: Designated Steel Construction Product EPD Requirements (8/2020, version 2.0) | | | | Er | couraged |
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| | | 1 | | | | |



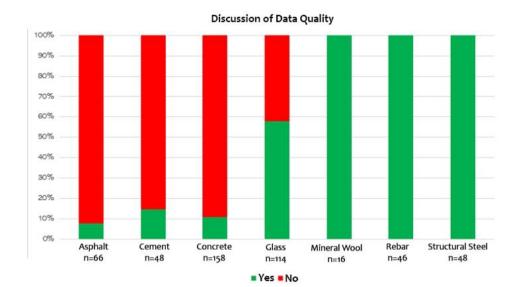
How clearly is EPD data quality communicated?

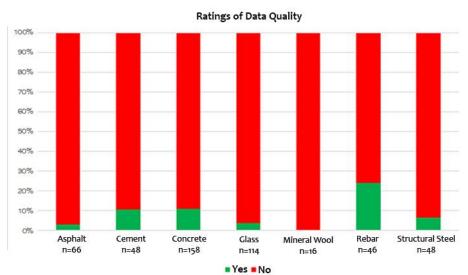
Why it matters

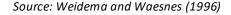
- Selecting materials
- Setting initial embodied carbon thresholds
- Lowering allowing thresholds over time

Table 1 Pedigree matrix with 5 data quality indicators

| Indicator score | 1 | 2 | 3 | 4 | 5 |
|---|--|---|--|--|--|
| Reliability | Verified ^a data based on measurements ^b | Verified data partly based on assumptions or non-verified data based on measurements | Non-verified data partly based on assumptions | Qualified estimate (e.g. by industrial expert) | Non-qualified estimate |
| Completeness | Representative data from a sufficient sample of sites over an adequate period to even out normal fluctuations | Representative data from a smaller number of sites but for adequate periods | Representative data from an adequate number of sites but from shorter periods | Representative data but from a smaller number of sites and shorter periods or incomplete data from an adequate number of sites and periods | Representativeness unknown or incomplete data from a smaller number of sites and/or from shorter periods |
| Temporal correlation | Less than three years of difference to year of study | Less than six years difference | Less than 10 years difference | Less than 15 years difference | Age of data unknown or more than 15 years of difference |
| Geographical correlation | Data from area under study | Average data from larger area in which the area under study is included | Data from area with similar production conditions | Data from area with slightly similar production conditions | Data from unknown area or area with very different production conditions |
| Further technological correlation | Data from enterprises, processes and materials under study | Data from processes and materials under study but from different enterprises | Data from processes and materials under study but from different technology | Data on related processes or materials but same technology | Data on related processes or materials but different technology |





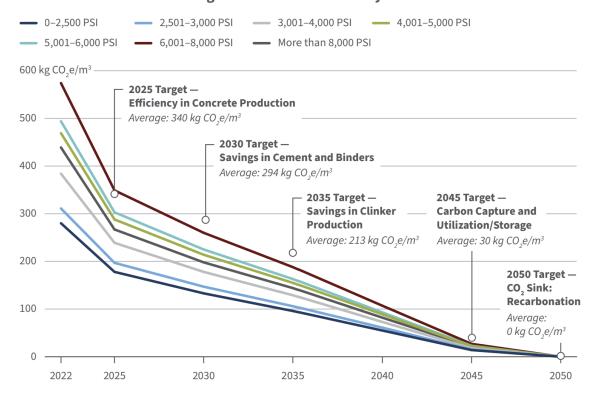


How often are production characteristics reported?

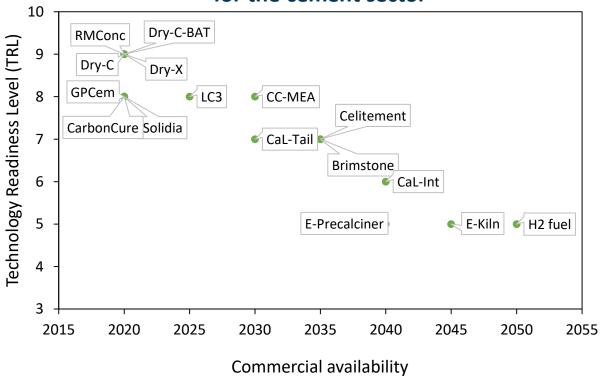
Why it matters

- Setting initial embodied carbon thresholds
- Lowering allowing thresholds over time

Exhibit 9 Recommended US federal procurement targets for various ready mix concrete strengths to achieve net zero by 2050



Emerging low-carbon technology availability for the cement sector

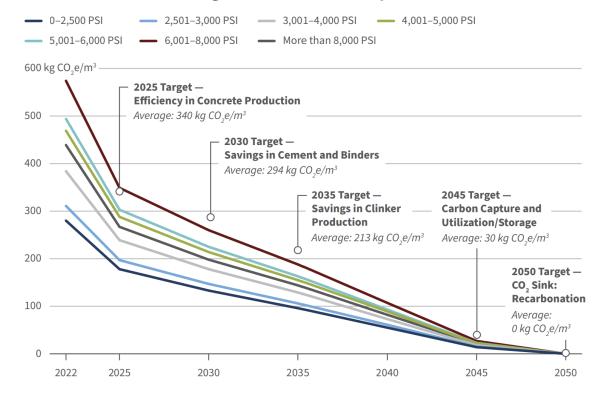


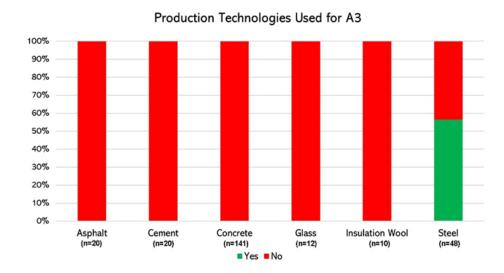
How often are production characteristics reported?

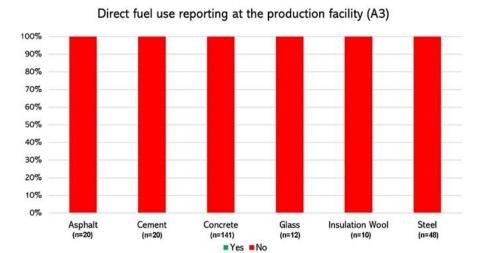
Why it matters

- Setting initial embodied carbon thresholds
- Lowering allowing thresholds over time

Exhibit 9 Recommended US federal procurement targets for various ready mix concrete strengths to achieve net zero by 2050







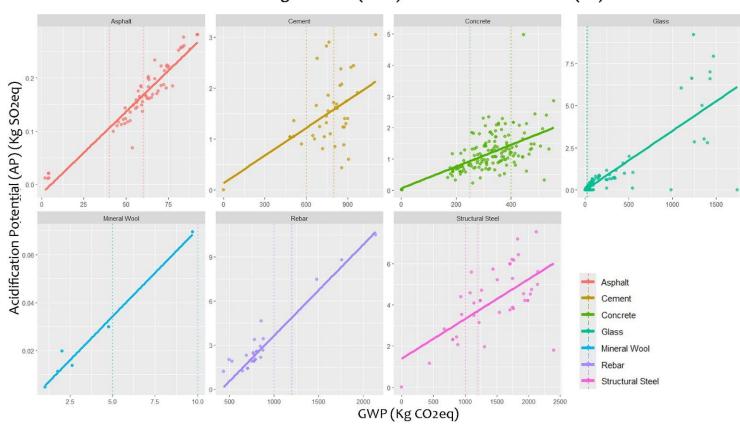


How often are supply chain locations reported?

Why it matters

Ensuring environmental co-benefits

Global Warming Potential (GWP) vs Acidification Potential (AP)





Developing best practices for EPDs: current status

ADVANCE ROBUST
ENVIRONMENTAL PRODUCT
DECLARATIONS



Phase I: Data Quality Improvement

- Draw on ongoing data improvements to Federal LCA Commons and fill existing data gaps
- Determine PCRs meeting EPA's PCR Criteria
- Collect third-party-verified EPDs and industry benchmarks

SET THRESHOLDS FOR LOW EMBODIED CARBON MATERIALS



Phase II: Threshold Setting

- Develop thresholds for each material/product type, considering performance requirements, regionality and viable industry averages
- Finalize thresholds, informed by stakeholder input via public comments

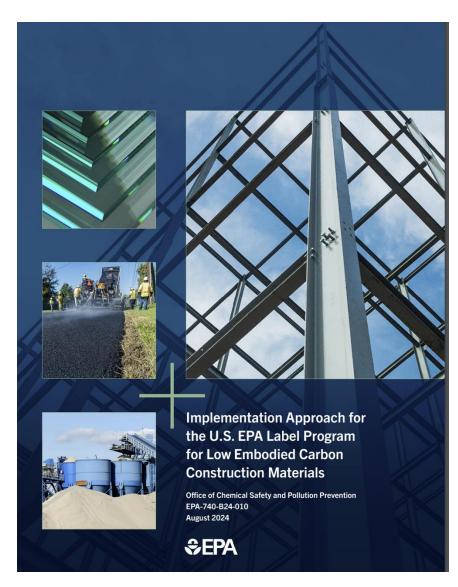
LAUNCH LOW EMBODIED CARBON LABEL



Phase III: Labeling

- Label materials/products meeting thresholds using EPDs
- Launch publicly accessible registry of labeled materials/products
- Highlight labeled materials in other platforms, federal programs, and procurement policies

Figure 2. Three Phases of the Label Program.



Best practices for EPDs: current status

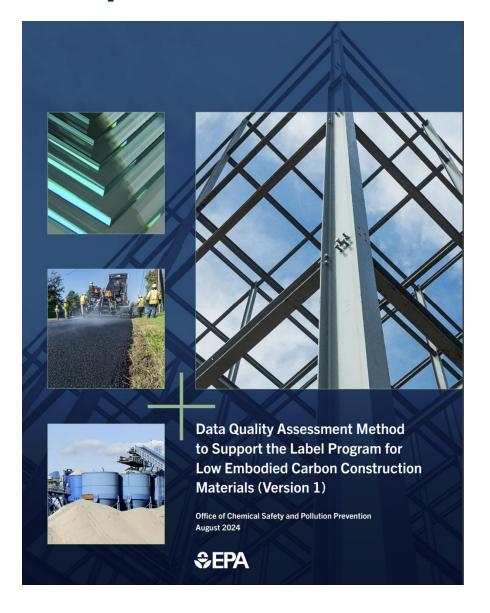


Table 1. Flow-Level DQIs

| Indicator | Definition | ← Highest Data Quality (Lowest Score) | | | | Lowest Data Quality (Highest Score) → | | | | | | | | | | | | | |
|---|--|---|--|--|--|---|-------------|---|--|--|--|----------|--|----------|--|----------|--|--|--|
| | | 1 | 2 | 3 | | 4 | 5 (Default) | | | | | | | | | | | | |
| Temporal representa- tiveness | Indicates the temporal difference between the date of data generation and the date the data are supposed to represent based on the PCR. | Less than 3 years of difference | Less than 6 years of difference | Less than 10 years of difference | | years of | | years of | | years of | | years of | | years of | | years of | | Less than 15 years of difference | Age of data unknown or more than 15 years |
| Geographic -al representa- tiveness | Indicates how well the geographical area from which data for a unit process are collected satisfies the goal of the study (ISO 14044). | Data from same resolution ^a and same area of study | Within one level of resolution and a related area of study ^b | Within two levels of resolution and a related area of study | | levels of resolution and a related | | levels of resolution and a related | | Outside two levels of resolution but a related area of study | From a different or unknown area of study | | | | | | | | |
| Technolog- ical representa- tiveness | technology categories: process design, operating are are are are | | ology ories | One of the technology categories is equivalent | None of the technology categories are equivalent | | | | | | | | | | | | | | |
| Data collection methods | Assessment of the robustness of the sampling methods and data collection period. | Representa- tive data from >80% of the relevant market, dover an adequate periode | Representa- tive data from 60–79% of the relevant market, over an adequate period, or representa- tive data from >80% of the relevant market, over a shorter period | Representa- tive data from 40–59% of the relevant market, over an adequate period, or representa- tive data from 60–79% of the relevant market, over a shorter period | | tive data from 40–59% of the relevant market, over an adequate period, or representa- tive data from 60–79% of the relevant market, over a shorter | | Representa- tive data from <40% of the relevant market, over an adequate period, or representa- tive data from 40–59% of the relevant market, over a shorter period | Unknown or data from a small number of sites and from shorter periods | | | | | | | | | | |

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PCR development: who's at the table?

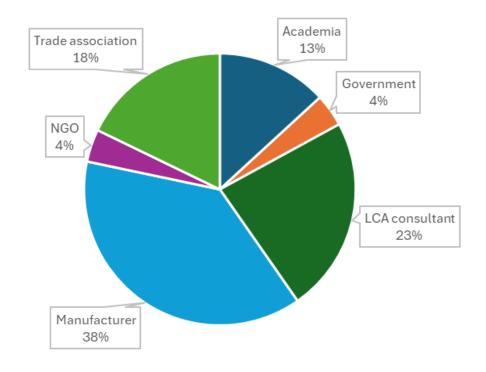
Program operators reviewed to date

| Country | Program Operator for PCRs | | | | |
|-------------|---|--|--|--|--|
| Austria | Bau-EPD | | | | |
| Canada | FPINnovations | | | | |
| France | AENOR | | | | |
| Germany | Institut Bauen und Umwelt e.V. (IBU) | | | | |
| India | EPDIndia | | | | |
| Ireland | EPDIreland | | | | |
| Italy | EPDItaly | | | | |
| Japan | Japan Environmental Management Association for Industry | | | | |
| Netherlands | Milieu Relevante Product Informatie (MRPI) | | | | |
| Poland | Instytut Techniki Budowlanej (ITB) | | | | |
| Korea | Korea Environmental Industry & Technology Institute (KEITI) | | | | |
| Sweden | The International EPD System | | | | |
| Taiwan | EPDTaiwan | | | | |
| UK | Building Research Establishment (BRE) | | | | |
| US | ASTM International | | | | |
| | Carbon Leadership Forum | | | | |
| | CSA | | | | |
| | NAPA | | | | |
| | NRMCA | | | | |
| | NSF International | | | | |
| | SCS Global Services | | | | |
| | Smart EPD | | | | |
| | Sustainable Minds | | | | |
| | UL Environment | | | | |

Covered products to date

| Country |
|------------------------------------|
| Asphalt |
| Building and Construction Products |
| Cement |
| Concrete |
| Flat Glass |
| General |
| Mineral Wool |
| Reinforcing Steel |
| Thermal Insulation |
| Wood |

Stakeholder representation (n=130)



Summary

- Embodied carbon policies are proliferating globally, particularly for building materials
- PCRs and EPDs are also proliferating, but are still works in progress:
 - Their coverage of building materials and products is incomplete
 - Their processes and contents can be improved to better support embodied carbon regulations
- Efforts are underway to make improvements, particularly in the U.S.
 - Data quality ratings, secondary data, comparability, and transparency
- Key remaining opportunities include:
 - Ensuring comparability in reporting and consistency in data quality
 - Production and supply chain characteristics transparency
 - Broader stakeholder engagement
 - Timeliness of data

Thank You!