KNAUF

April 11, 2025

Knauf comments on the March 13, 2025 CARB Workshop – Reporting and Baseline Options for Building Embodied Carbon

LCA Scope for the "Baseline"
Slides 21-25
An LCA scope of Cradle-to-Grave (A1-C4) is the most complete representation of a products environmental impact and would provide the most robust data for the state to set its baseline. It is important to understand when developing EPDs a Product Category Rule (PCR) is used. PCRs are specific to product types and these documents dictate what LCA scope is to be used for that product type EPD. Different product type EPDs may have different LCA scopes (e.g. insulation vs concrete). If the state considers varying LCA scopes to align with PCRs, products that fall into the same product types should all be held to the same LCA scope requirement. For example, the Building Envelope Thermal Insulation PCR dictates a cradle-to-grave LCA scope. All products that fall under that PCR should be held to the cradle-to-grave reporting requirement.

Manufacturer Reporting Requirements
Slide 40
CARB lists that manufacturers will be required to report "product quantities and attributable revenue." As a manufacturer, this information would be considered confidential.

Slide 43
Please provide clarity and guidance regarding "EPD type data" that is to be reported by manufacturers. How does CARB define "primary and background data"? Does CARB mean disclosure of this information outside of the EPD? EPD results will reflect this data being used in the modeling and LCA calculations but likely do not disclose specifically.

While we understand the need for current data on products, to provide EPDs (that use primary and background data) that are <2 years old is currently not feasible. Manufacturers rely on information from our supply chain to create quality EPDs. Many of these suppliers do not have LCA information readily available at this time. To also strive for data that is <2 year old, will likely not show change from one EPD to the next as innovation and/or energy improvements often take time.

The traditional validity period of an EPD is 5 years. In order to provide EPDs that contain info that is <2 years old, manufacturers will need to continually be updating EPDs. This puts pressure on in-house LCA teams, LCA consultants, and verifying entities. EPDs also come at a cost and at this frequency and volume it would be a considerable financial burden for many.

Thank you for your consideration and happy to discuss further.

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