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Comments of
Tile Council of North America, Inc.
to the
California Air Resources Board
Regarding
March 13 Workshop on Reporting and Baseline Options for Building Embodied Carbon

The Tile Council of North America (TCNA) appreciates the opportunity to submit these comments in response to the California Air Resources Board's (CARB) March 13, 2024, workshop on Reporting and Baseline Options for Building Embodied Carbon, as part of CARB's responsibility under Health and Safety Code §38561.3 to develop by December 31, 2026, a framework for measuring the average carbon intensity of materials used in the construction of new buildings.

TCNA is the trade association of the North American ceramic tile industry. Our membership includes manufacturers that account for over 99% of U.S. and Canadian ceramic tile production, 95% of Mexican production, and more than 99% of the mortar, grout, and related installation materials produced in North America. As both a policy and technical resource for the industry, TCNA conducts cutting-edge research and works collaboratively with international bodies to develop performance and sustainability standards for tile and related products.

TCNA and its members have long demonstrated leadership in environmental transparency and sustainability. We have been deeply involved in the development of Environmental Product Declarations (EPDs) for ceramic tile, mortar, and grout, and have participated from the outset in the committee that developed the North American flooring Product Category Rule (PCR), which governs the creation of these EPDs. These tools were developed to promote transparency and allow fair, standardized reporting of environmental impacts across industry segments.

Consideration of the Goals of HSC §38561.3

We commend CARB in its efforts to reduce embodied carbon in construction materials and admire the statute's goal of achieving a 40% net reduction in greenhouse gas emissions by 2035. However, we are concerned that certain proposals discussed during the workshop could undermine this goal by creating costly, unrealistic burdens on manufacturers—particularly small and medium-sized enterprises—while offering limited additional benefit to the intended carbon reduction outcomes.

Industry-Wide EPDs Today Not Suitable for Product-Level Comparison

As an organization that helped pioneer industry-wide EPDs, TCNA stresses that these declarations were never intended to be used for direct comparison to product-specific EPDs. Industry-wide EPDs were initially meant to represent an average across a broad category of products; by design, they do not offer the granularity necessary for accurate comparisons at the individual product level. The range of variation within such an average can be substantial.

Using the industry-wide EPDs that are available today as a baseline for evaluating specific products is not only inappropriate but risks misleading decision-makers. Further sub-sector EPD development could theoretically address this, but the time and cost to develop such declarations are significant and often prohibitive, especially for smaller businesses. Ironically, the original

intent of industry-wide EPDs was to help these very companies participate in sustainability reporting without the unsustainable cost of creating product-specific documents.

Compliance with Proposed Requirements Will Be Infeasible and Costly

The proposed requirements for EPD reporting are inconsistent with international best practices and exceed the scope of what HSC §38561.3 envisions. For example, the proposed granularity of data, including potentially facility-level and revenue data, is unprecedented, overly burdensome, and not grounded in statutory requirements. Quarterly data submission is an unrealistic and excessive demand as most manufacturing data used in EPDs is collected on an annual basis, consistent with lifecycle assessment norms. Finally, requiring revenue or other sensitive business information poses significant confidentiality concerns.

Imposing these requirements risks driving up compliance costs and limiting participation, especially from smaller or regional manufacturers. The ultimate burden will fall on consumers, as manufacturers will need to pass these compliance costs on, which will directly increase the cost of construction materials—undermining state efforts to address California’s housing affordability crisis.

Cradle-to-Grave Accounting is Critical for Accuracy

We appreciate CARB staff’s inclusion of a cradle-to-grave lifecycle analysis (Alternative 1) in its preliminary proposal. This approach aligns with the North American flooring PCR and is essential for capturing the full environmental impact of products, especially non-structural materials like tile flooring.

By contrast, a cradle-to-install or cradle-to-gate approach (Alternative 2) would misrepresent the sustainability of various materials. Products with longer service lives and lower maintenance demands—like ceramic tile—offer significant environmental advantages over time,

which would be obscured under a truncated lifecycle view. Ignoring downstream impacts such as maintenance, replacement, and end-of-life disposal distorts the embodied carbon profile and risks incentivizing less durable materials that require frequent replacement, thereby increasing emissions over the building's life cycle.

To ensure fair and accurate accounting of embodied carbon, especially for finishing materials, a cradle-to-grave approach must be adopted. Anything less risks misleading stakeholders and running counter to the carbon reduction goals enshrined in statute.

Request for Further Consultation and Timeline Flexibility

TCNA urges CARB to slow the timeline for this regulatory process to allow for further consultation with industry experts, standards developers, and key stakeholders. The concepts proposed thus far are complex and far-reaching, and a rush to formalize requirements without sufficient input could have serious unintended consequences. We encourage CARB to establish an extended stakeholder engagement process and technical advisory committees to ensure that any final framework is technically sound, economically viable, and practically implementable.

Conclusion

We appreciate CARB's commitment to sustainability and thank you for the opportunity to provide feedback. TCNA and its member companies share the state's goal of reducing greenhouse gas emissions and are eager to continue supporting sound policy development. However, we respectfully urge CARB to reconsider several aspects of its proposal to ensure that they are aligned with existing industry practices, international standards, and the economic realities of manufacturers large and small.

We look forward to continued collaboration and dialogue on this important issue.