



December 8, 2025

Knauf comments on the October 30th, 2025 CARB Meeting - “Building Embodied Carbon Reporting Technical Meeting”

Thank you for the presentation and materials provided at the most recent technical meeting. The comments below relate to that information.

General

In the document, “Regulated Building Material Reporting Information for Manufacturers and Importers,” CARB acknowledges that their proposed requirements align with the draft U.S. EPA C-MORE EPD criteria for data quality and transparency. Many of these requirements, listed by CARB and the EPA, require time, LCA expertise, and financial resources from manufacturers. Federal funding was available that aligned with the EPA’s initiatives. Without that federal funding the draft EPA requirements, many adopted by CARB, put a heavy burden on manufacturers. EPDs are not simple, inexpensive documents to create and with CARB reducing the longevity of an EPD from 5 years to 2, it greatly adds to that burden.

Data

The 2-year requirement regarding primary data is challenging. To publish EPDs that use primary data that is <2 years old, manufacturers will need to update EPDs at a much faster rate than the traditional 5-year validity period of an EPD. This puts pressure on in-house LCA teams, LCA consultants, and verifying entities.

With a more frequent rate of EPD publishing, there also may be little to no change in results. Impactful change in manufacturing that would significantly affect results does not often occur quickly. If data is not changing, manufacturers will put time and resources into updating EPDs that will have marginally different results. This will also impact manufacturers that are further along in their EPD journeys. Those manufacturers who have already made significant improvement to their environmental impact in years prior to the proposed reporting requirement, will have a harder time showing noteworthy improvement in the shortened 2-year window but will still be required to go through the process of updating their EPD.

PCRs

CARB acknowledges that PCRs may need to update in order for EPDs produced using that PCR meet CARB requirements. PCR updates are outside direct control of a manufacturer. Multi-disciplinary groups are established to come together to work on PCR updates. This can be a lengthy process and costly.

Thank you for your consideration and happy to discuss further.