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Submitted online via Comments to Embodied Carbon Reporting Technical Meeting October 30, 2025 | California Air Resources Board

December 8, 2025

California Air Resources Board
1001 I Street, Sacramento, CA 95814

Subject: Public Comments to California Regarding the Embodied Carbon Reporting Technical Meeting, October 30, 2025

Thank you for the opportunity to provide public comments on CARB's Embodied Carbon Reporting Technical Meeting on October 30. UL Solutions, operating for more than 130 years with an emphasis on safety-based standards and scientific integrity, values CARB's commitment to reduce GHG emissions linked to the manufacturing of construction products and materials.

UL Solutions is a leading provider of testing, inspection and certification services and complementary software, advisory and assurance services across a wide range of industry sectors, including the Corporate Sustainability Reporting Directive (CSRD), as well as voluntary disclosure schemes like the CDP, Global Reporting Initiative (GRI), International Sustainability Standards Board (ISSB) and other global frameworks.

UL Solutions is supportive of standards-based, science-driven programs and commends CARB's commitment to reducing carbon intensity in the built environment supply chain. We appreciate that the proposed approach references internationally recognized standards and incorporates third-party verification, which are critical for credibility and consistency. Because the proposed changes will influence Product Category Rules (PCRs), we believe it is essential for CARB to have representation on PCR committees to help guide market evolution and ensure alignment with regulatory objectives.

We also recognize that many of the proposed requirements—such as facility-specific and product-specific Environmental Product Declarations (EPDs) and limits on data age—will help advance transparency and improve the quality of information available to stakeholders. These measures are important steps toward more accurate reporting and meaningful carbon reduction.

As CARB's goal is to drive embodied carbon reduction, we encourage consideration of existing carbon reduction programs already implemented by certifiers and program operators for building materials. Harmonizing these programs will help prevent conflicting or duplicative requirements and reduce complexity for manufacturers and customers. UL Solutions stands ready to collaborate and build upon CARB's efforts to create a streamlined, effective framework that accelerates progress toward shared objectives.

We appreciate the opportunity to comment on this important topic and look forward to further collaboration. If you have any questions, please contact Melissa Klein, Federal and State Government Affairs Lead, at Melissa.Klein@UL.com or 202.704.0607.

Sincerely,

/s

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