NAIMA
NORTH AMERICAN INSULATION MANUFACTURERS ASSOCIATION

December 8, 2025

RE: CARB October 30, 2025, Embodied Carbon Reporting Technical Meeting Comment Period

Dear CARB Embodied Carbon Team,

The North American Insulation Manufacturers Association ("NAIMA") is the trade association for manufacturers of fiber glass, rock wool, and slag wool insulation products. Its role is to promote energy efficiency and environmental preservation using fiber glass, rock wool, and slag wool insulation, and to encourage the safe production and use of these materials. NAIMA member companies own and operate three fiber glass manufacturing facilities in California.

NAIMA welcomes the opportunity to comment on the proposed reporting requirements. The insulation industry has historically been a leader in providing Environmental Product Declarations (EPDs). Our members' products help advance several of California's policy goals, including combating climate change, improving energy efficiency of buildings, reducing consumer energy costs, and improving the fire safety and fire resiliency of homes. NAIMA supports the EPD model in reporting on required values.

1. **EPD Requirements.** NAIMA opposes the requirement that underlying primary data be less than two years old for EPDs to be used and instead proposes less than three years old at the time of publication.

    a) **Two years is much shorter than industry standards.** The *UL Product Category Rules for Building Related Products and Services, Part A: Life Cycle Assessment Calculation Rules and Report Requirements*[1] prescribes a value of no less than five years for primary data. Understanding that EPDs are permitted to be used for five years under UL guidelines, primary data could be up to 10 years out of date at the time of use, the insulation Product Category Rule (PCR) has changed this value to three years at the time of publication.

    b) **Short Timeline Increases Costs for Manufacturers.** The two-year-old data requirement effectively requires our members to continuously maintain their EPDs, increasing cost of compliance. This burden will increase costs for each of our members by tens of thousands of dollars per year to remain in compliance.

        - The timeline to perform an LCA and finalize EPDs is 12-18 months, and this is in addition to the need for manufacturers to now create facility & product-specific EPDs. This two-year requirement is not practical, particularly for products that do not experience frequent changes in manufacturing practice in each facility (which includes insulation products).

[1] https://www.shopulstandards.com/ProductDetail.aspx?productId=ULE10010_6_S_20220328

- Program operator guidelines already typically require an EPD to be reviewed annually by the manufacturer and require an update if EPD LCIA results change by up to 10%. The age of the primary data used to create an EPD is not as relevant as the opportunity to companies to innovate and introduce new EPDs at any time, which allows for innovation and market differentiation to occur.
- Regarding internal versus external entities handling the development of EPDs, many of our members have internal staff to manage the process; however, the requirements as proposed would dramatically increase activity, causing a large increase in external consultants handling the process.
- Smaller companies may not have LCA staff in-house or be able to cover the cost of compliance. This may prevent these smaller companies from selling products in California.

c) **Issue with Data Harmonization for Emission Factors.** The data requirement regarding emission factors used in EPDs being harmonized with factors accepted by CARB introduces challenges as manufacturers would no longer be able to use supplier specific data for EPDs. As manufacturers work within their supply chain to decarbonize, and to demonstrate improvements, it is necessary to use supplier-specific data, not industry average information as proposed by CARB. Additionally, the tools provided within the meeting materials do not outline what these factors look like for insulation products. NAIMA is thus unable to comment on the validity of the CARB values proposed for use, and we request CARB make such values available for comment when proposed.

2. **Insulation Products Covered by Requirements.** The NAICS codes and Relevant Harmonized System Headings on Slide 24 of the 'Material Reporting' presentation do not correspond to all insulation types. Based on the codes listed in the presentation, it appears to only cover mineral fiber and polystyrene products. If it is the intent to cover all insulation products, the covered products section for insulation will need to be to be updated to reflect that intent.

   If it is the intent that only limited insulation products are included in the reporting requirements, NAIMA recommends that insulation not be included as a covered product or at a minimum in Phase 2. It is NAIMA's understanding that insulation products were only included in these reporting requirements as they were in existing policies and not because it is considered a "high GHG emission building material" as discussed in meeting and per slides 21-22 of 'Material Reporting' presentation.

3. **Biogenic Carbon Accounting Requirements.** NAIMA supports the separate reporting of biogenic carbon. NAIMA requests that biogenic carbon only be included for products for which there are third-party EPDs to back up claims. There are important requirements that need to be met when claiming biogenic carbon. The American Center for Lifecycle Assessment (ACLCA) published guidance on how to handle biogenic carbon with regard

to Product Category Rules (and in turn EPDs).[2] Specifically, the recommendations outlined Section 8.1.3 on pages 33-34 of the ACLCA guidance should be included- these are critical to proper accounting of the benefits of biogenic carbon. These items that were identified by ACLCA are listed below for exactness:

a) **Documentation on sourcing of biogenic material.** Claims relating to the source of byproducts or virgin biobased materials need to be from sustainability managed forests and claims must be substantiated *"If declared, PCRs should specify which wood and wood-derived materials, relevant to the products under evaluation, are subject to the sustainably managed forest requirement presented in ISO 21930:2017, clause 7.2.7. Furthermore, the PCR should specify which certification schemes or other forms of evidence are acceptable for identifying a forest as sustainably managed. For example, in North America, the FTC Green Guides, specifically §260.2, §260.3, and §260.6, could be considered the minimum requirement to be met."*

b) **Accounting for Emissions at end-of-life stage (C1-C4).** The flow of biogenic carbon at this stage is often overlooked, with benefits obtained in A1-A3 being touted as lasting indefinitely. ***"****PCRs should specify decomposition rates and landfill gas capture rates of main bio-based product materials to maximize consistency in carbon balances or provide references to acceptable data sources, such as the EPA WARM model."*

c) **Requiring consistency on data for biobased product claims.** This standardizes biogenic carbon claims and heads off any mischief regarding baseless calculations of biogenic carbon content. "*If declared, PCRs should contain recommendations or requirements for background inventories of main bio-based materials to maximize consistency in carbon balances."*

4. **Documentation Retention of Disclosure Requirements.** The 10-year recordkeeping requirement proposed on Slide 18 of the 'Material Reporting' presentation is overly burdensome. NAIMA suggests a three-year requirement.

5. **Lifecycle Approach.** NAIMA supports the whole building lifecycle (WBLCA) approach outlined in the "Covered Project Reporting" presentation. Insulation products are unique in that while there are emissions from the manufacturing of the product, additional levels of insulation reduce emissions over the lifecycle of a building (Module B6).[3]

Thank you for your consideration of these comments.

Sincerely,

Charlie Haack
Vice President, Technical Services

[2] https://cdn.prod.website-files.com/685abecf52079050b589877d/685abecf52079050b58989b8_ACLCA%20ISO-21930%20Guidance%20-Final%20(1).pdf

[3] https://insulationinstitute.org/wp-content/uploads/2024/10/102224-NAIMA-Carbon-Payback-Period-Analysis.pdf