



Date: December 7, 2025

California Air Resources Board
Embodied Carbon Reporting Program
1001 I Street
Sacramento, CA 95814

Re: Comments on Covered Building Materials Reporting Concepts – October 30, 2025 Technical Meeting

Dear Mr. Ambrose:

The National Ready Mixed Concrete Association (NRMCA) appreciates the opportunity to provide comments on the California Air Resources Board's (CARB's) proposed concepts for Covered Building Materials Reporting discussed at the October 30, 2025 technical meeting.

NRMCA represents ready mixed concrete producers nationwide, including many facilities operating in California. NRMCA also serves as a program operator for concrete Environmental Product Declarations (EPDs), overseeing the development, maintenance, and administration of concrete Product Category Rules (PCRs) and EPDs developed in conformance with ISO 14025, ISO 14040/44, and ISO 21930. Our members are actively engaged in reducing the embodied carbon of concrete through material innovation, efficiency improvements, optimized mix designs, and transparent, third-party verified environmental reporting.

We commend CARB staff for incorporating feedback from prior workshops, including reliance on EPDs, limiting reporting to an annual basis, and recognizing whole-building life cycle assessment (WBLCA) approaches. These concepts align with current industry practice and existing procurement pathways.

Program Operator and EPD Framework Considerations

As a program operator, NRMCA is concerned that several proposed EPD-related requirements discussed at the October 30 technical meeting may exceed both statutory intent under AB 2446 and AB 43 and established ISO-based EPD frameworks. Introducing additional EPD criteria outside of the PCR development process risks undermining industry acceptance, comparability, and uniformity—all of which are central to the success of EPD programs.

PCRs are consensus-based documents developed through multi-stakeholder processes including industry, government, academia, and life-cycle assessment experts. Modifications to PCR requirements typically require six months to over a year to complete, followed by additional time for producers to update EPDs and complete third-party verification. Accelerated timelines or unilateral modifications could result in incomplete data, increased costs, and de-harmonization across jurisdictions.



Concerns with Modified EPD Requirements

NRMCA shares concerns similar to those raised by other building material program operators regarding proposed EPD modifications, including:

- Mandatory disclosure of detailed material component percentages, which could compromise proprietary mix design information and competitive neutrality;
- Mandatory harmonization of emission factors outside of PCR governance, despite EPDs and facility reporting programs serving different purposes;
- A blanket requirement that all primary data be less than two years old, which may conflict with existing PCR data quality guidance and the five-year validity period of EPDs.

These changes would impose significant administrative and financial burdens on producers, EPD program operators, and verifiers—costs that would ultimately be passed down the supply chain.

Confidentiality and Competitive Impacts

Several proposed reporting elements would require disclosure of sensitive production, cost, and revenue data. In a competitive, low-margin industry with both publicly traded and privately held companies, such disclosure raises serious confidentiality and antitrust concerns. The objective of AB 2446 and AB 43 is emissions reduction—not altering competitive market dynamics or discouraging innovation.

Recommendations

NRMCA recommends that CARB:

- Engage directly with EPD program operators before finalizing any modifications to EPD requirements;
- Maintain alignment with ISO standards and existing PCR governance processes;
- Allow facility-average EPDs as a compliant reporting mechanism;
- Retain Method 2 reporting beyond 2030 if it proves effective;
- Utilize existing facility-level reporting programs wherever possible; and
- Focus benchmarking efforts on comparable, verified EPD data rather than EEIO modeling.

NRMCA supports California's leadership in addressing embodied carbon and looks forward to continued collaboration with CARB to develop a program that achieves meaningful emissions reductions while remaining implementable, cost-effective, and nationally harmonized.

Respectfully submitted,

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