

December 8, 2025

Ms. Pamela Gupta, Branch Chief
Building Decarbonization and Innovative Strategies Branch
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Subject: Public Comment on October 30, 2025 CARB Workshop on Embodied Carbon

Dear Ms. Gupta,

On behalf of the California Nevada Cement Association (CNCA), we wish to express our thanks for the opportunity to comment on the California Air Resources Board's (CARB) ongoing efforts to develop a regulatory program attendant to the net reduction in greenhouse gas emissions in "building materials" as required by Assembly Bill AB 2446 (Holden) signed by Governor Newsom in September 2022 and AB 43 (Holden), which was signed by the Governor in October 2023.

We would like to remind CARB, to what was expressed in prior meetings and workshops, and that the cement industry's understanding was that CARB would not include "subcomponents of a construction material" in the reporting requirement being developed. Cement, which is not a stand-alone "building material" is not under the scope of the statute. Cement is not a primary "building material", but rather an ingredient used in the manufacturing of concrete, grouts and related materials which are all primary "building materials".

Additionally, the cement industry is highly regulated under California's carbon reduction laws, and regulations, and has been reporting to CARB through its Mandatory Greenhouse Gas Reporting Regulation (MRR) for over a decade. As cement is outside of the scope of this regulatory action, and CARB has access to all of the data in the MRR system, there is absolutely no need for additional reporting, nor is there any interest in participating in duplicative reporting.

Regarding CARB's approach to development and schedule for updating Environmental Product Declarations (EPDs). Both the cement and concrete industries recently updated the Product Category Rules (PCRs), and CARB had the option to engage in this process but did not participate. The current process cycle is every five years, and CARB will have an opportunity to engage in that update. By ignoring the industry process and adding unnecessary costs and trying to change the current update cycles sets a dangerous precedent, and undermines the significant work those industries did in ensuring consistency in reporting.

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The industry is continuing to be a partner with the state of California in trying to reach carbon reduction goals. Up to this point, the State has yet to provide a strategic implementation plan to

identify and remove hurdles consistent with SB 596 (Chapter 246, of the statutes of 2021) implementation that are pivotal to decarbonization efforts. Trying to force the inclusion of cement into AB 43 / AB 2446 implementation does not help the industry to deploy decarbonization levers at cement plants in any way, and can potentially add unnecessary costs which could interfere with these efforts.

If you and your staff would like to discuss these issues in further detail, we are more than happy to accommodate that request.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas R. Tietz", with a long horizontal line extending to the right.

Thomas R. Tietz
Executive Director

CC:

Honorable Steven S. Cliff, Ph.D., Executive Officer, California Air Resources Board
Rajinder Sahota, Deputy Executive Officer, California Air Resources Board
Mark Sippola, Chief, California Air Resources Board
Chanell Fletcher, Deputy Executive Officer, California Air Resources Board
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