



Via Online Portal

December 8, 2025

California Air Resources Board (CARB)
Embodied Carbon
Embodiedcarbon@arb.ca.gov

Re: Comments on CARB October 30th Embodied Carbon Reporting Technical Meeting

The Asphalt Roofing Manufacturers Association (ARMA) welcomes the opportunity to submit comments on the California Air Resources Board's (CARB's) Technical Meeting on Embodied Carbon Reporting Requirements held on October 30, 2025. ARMA is a trade association representing North America's asphalt roofing manufacturing companies and their raw material suppliers. Our members account for approximately 90% of North American production of asphalt shingles and asphalt low-slope roof membrane systems.¹ ARMA is committed to the long-term sustainability of the asphalt roofing industry and supporting responsible sustainable building initiatives.

As noted in prior comments submitted April 9, 2025, ARMA has considerable experience developing [industry-average environmental product declaration \(EPD's\) for asphalt roofing systems](#), including asphalt shingle roofing systems; SBS and APP modified bitumen systems; and built-up roofing systems. Given the complexity of the multi-year undertaking to develop these industry-average EPD's, ARMA continues to have serious concerns regarding CARB's proposed timeline and designation of asphalt shingles for priority Phase 1 reporting; the undue burden CARB's proposed requirements will place on asphalt roofing manufacturers at a time when California is facing serious challenges regarding housing affordability; and the statutory overreach of some proposed reporting requirements.

1. Asphalt Shingles Should Not be Designated as Building Materials Prioritized for Phase 1 Reporting

ARMA continues to question CARB's inclusion of asphalt shingles on the list of building material sectors prioritized for "Phase 1" reporting starting with 2026 data reports which are due Q1 of 2027. CARB's October 30th presentation identifies two main criteria for building materials prioritized for Phase 1 reporting: 1) building materials with "high emission impacts" and 2) building materials "currently reported in existing federal or state buy clean programs." According to CARB's preliminary estimates presented during the October 30th meeting, asphalt shingles account for only 2% of total California building material emissions. While CARB notes that asphalt is included in a number of federal and state

¹ Additional information about ARMA's mission and activities can be found on its website, <https://asphaltroofing.org/about-arma/about-us/>. See also ARMA, Bitumen Waterproofing Association, National Roofing Contractors Association, Roof Coatings Manufacturers Association, [The Bitumen Roofing Industry – A Global Perspective: Production, Use, Properties, Specifications and Occupational Exposure](#). 2nd ed., 2011 (referenced herein as the [Roofing Global Perspectives Paper](#)). Available at https://docs.google.com/viewerng/viewer?url=https://asphaltroofing.org/wp-content/uploads/2017/05/The_Bitumen_Roofing_Industry_-_A_Global_Perspective.pdf.



green procurement programs, there are no federal or state Buy Clean programs that currently require reporting of asphalt shingles. Given that asphalt shingles fail to meet both criteria for Phase 1 reporting, we contend that CARB should designate asphalt shingles as Phase 2 building materials subject to initial reporting starting in 2028 for 2027 data.

ARMA notes that CARB was responsive to our suggestion at the September 9th Baseline Technical Meeting that, for purposes of baseline assessment, asphalt shingles should be considered separately from asphalt pavement. It is important that CARB, likewise, adopt a consistent approach of separately addressing asphalt shingles and asphalt pavement for purposes of reporting under the program.

2. CARB's Proposed Requirement that EPDs be Based on Primary Background Data <2 Years Old is Infeasible and Overly Burdensome, for No Identifiable Benefit

We continue to hear feedback from our members regarding the infeasibility of CARB's proposed requirement that EPD's be based on primary background data <2 years old. As noted in our April 2025 comments, it took more than two years to complete ARMA's most recent update of the asphalt roofing industry average EPDs. CARB's proposed requirements would effectively mean that the cycle for updating EPDs would need to begin as soon as EPDs are finished being updated. We question whether there is sufficient availability of EPD consultants to handle the demand for continual updating of EPDs. Further, there is no reason to believe a 2-year window is needed to ensure EPDs reflect current environmental impacts when other approaches could be used to require EPDs to be revised when there are significant changes in primary data. We appreciate the CARB's indication in the October 30th presentation that manufacturers can rely on best available data for initial reporting of 2026 data in 2027, but we urge CARB to adopt more reasonable data requirements for reporting after the initial reporting period.

3. CARB's Proposals for Required Harmonization of Emissions Factors and Restrictions on Supplier-Specific Data Undermine Industry Progress

ARMA is concerned that CARB's proposed requirements that emissions factors must be harmonized with CARB-accepted emissions factors and that reporting use CARB-approved default factors for supply chain-specific data could create significant barriers for manufacturers. This could lead to the need for separate EPDs tailored to California, adding complexity and cost. Furthermore, these requirements may prevent manufacturers from utilizing supplier-specific data, thereby discouraging investments in supply chain decarbonization and diminishing the value of existing EPDs and industry efforts to enhance transparency and accuracy. ARMA recommends that CARB follow established Product Category Rule (PCR) best practices for EPD creation and allow for the use of supplier-specific data while preserving confidentiality.

4. CARB's Proposed Requirement for Facility-Specific EPDs Exceeds Statutory Mandate and May Not Coincide with Industry Practice

CARB's proposal to require facility-specific EPDs is an overreach of the statutory requirements at HSC §38561.3(c)(2), which requires manufacturer submission of an EPD, but includes no requirement that



the EPD be facility-specific. The requirement for facility-specific EPDs may also be inconsistent with industry practice, since some asphalt shingle manufacturers may be more likely to generate EPDs on a product-specific basis rather than on a facility-specific basis, as products may be manufactured at multiple facilities. ARMA supports CARB's suggestion of allowing product-specific EPDs to cover product families, as this approach is consistent with industry practice for many asphalt roofing manufacturers.

5. Carb's Proposed Requirement to Report Product Revenues Exceeds Statutory Mandate and Raises Concerns Regarding Required Disclosure of Competitively Sensitive Information

There is no statutory requirement in HSC Sections 38561.3 and 38561.6 for manufacturers to report attributable product revenue, as is being proposed by CARB. Requiring the reporting of product price, revenue, or other competitively sensitive information raises concerns about mandated disclosure of information which may be protected by confidentiality agreements between buyers and sellers.

6. CARB Should Provide a Clear Regulatory Definition of "Importer"

Given that reporting requirements under the program are based on whether a reporting company is a manufacturer or importer, it is imperative that CARB provide a clear regulatory definition of "importer." The following description is included in the instructions of the reporting form for importers: "The importer is the entity that is primarily liable for the payment of any duties or first entity liable for any state tax filings on the merchandise, or an authorized agent acting on their behalf." CARB should clarify whether this description is the regulatory definition of "importer" under the program. If so, CARB should also define the term "primarily liable."

ARMA requests CARB's serious consideration of the potential impacts overly burdensome reporting requirements will have on the manufacturing and affordability of asphalt roofing products sold in California. ARMA urges CARB to not include asphalt shingles in Phase 1 reporting, adopt more feasible reporting requirements in keeping with industry practice, and limit the scope of information required to be reported to that authorized by statute.

Sincerely,

A handwritten signature in black ink, appearing to read "Reed B. Hitchcock", followed by a period.

Reed B. Hitchcock

Executive Vice President

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