



NATIONAL CEMENT
National Cement Company of California, Inc.

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December 8, 2025

Dr. Hanjiro Ambrose
California Air Resources Board (CARB)
1001 I Street
Sacramento, CA 95814

Re: Comments on October 30, 2025 Meeting on Building Embodied Carbon Reporting Requirements

Dear Dr. Ambrose:

Thank you for the opportunity to comment on CARB's October 30, 2025 Technical Meeting on Building Embodied Carbon Reporting. We appreciate the complexity and depth of the undertaking to implement an embodied carbon reporting regulation pursuant to Assembly Bill (AB) 2446 and AB 43.

We provide the following comments on behalf of National Ready Mixed Concrete Company (NRMCC) and National Cement Company of California (NCCC). NRMCC is a producer of ready-mixed concrete throughout the greater Los Angeles region. NCCC is a producer of cement from our facility in Lebec, California, in Kern County. Together, NRMCC and NCCC have a demonstrated track record of leadership in becoming lower carbon and helping move our industries forward.

Our primary lens for these comments is as a concrete producer, based on our understanding that CARB will exclude "subcomponents of a construction material" in the reporting requirement being developed. Cement is not a primary construction/building material, but rather an ingredient used in the manufacturing of concrete which is a primary building material.

The following points are fundamental to the design of the overall program. We hope CARB will acknowledge these points and adjust the program approach accordingly.

1. AB 2446 and AB 43 do not give CARB authority to require submission of financial data.

We note that there is no statutory authority to require manufacturers to report product revenue or product input cost data. We urge CARB to abandon any proposal mandating the submission of this type of confidential business information. A requirement to submit this information would jeopardize confidentiality and could also lead to conflicts under existing competition laws.

We assume CARB is seeking to respond to the statutory requirement to identify the "cost impact" associated with the law's requirements. Rather than pursuing the universe of information from every product sold by every producer in the state, we recommend an alternative approach to utilize the

State of California's position as a purchaser of significant quantities of materials for infrastructure and building projects across all state agencies. Over time, this volume of the State's purchasing – applied to the range of project types, product types, and regions within the state – should provide CARB ample data, and a representative sample, to determine any such cost impacts resulting from implementation of AB 2446 / AB 43.

2. CARB should ensure compatibility with existing industry standards, rather than creating California-specific standards that would be unnecessarily duplicative and create additional compliance burdens.

CARB has presented two different models for manufacturer reporting requirements. Model 1 is presented as involving Environmental Product Declarations that “meet CARB-specified submission requirements.” Model 1 is proposed to be the only long-term reporting method, taking effect by 2030.

We urge CARB not to pursue Model 1 as proposed. Model 1 would create a duplicative California standard for EPD reporting that is not compatible with existing industry standards, including by requiring EPD updates every two years.

The current Product Category Rules (PCRs) for materials have a five-year duration, and updates and modifications to PCRs are made in a thorough and deliberative process. In the case of concrete, a new PCR is about to be released, which has been a considerable effort involving many industry stakeholders, in a public and transparent process.

Similarly, according to existing industry standards, Environmental Product Declarations (EPDs) must be updated every five years. We urge CARB to acknowledge that there are natural incentives for a manufacturer to update EPDs more frequently than once every five years, as advancements in manufacturing processes and changes in raw materials yield carbon reductions that improve a particular product's EPD. As time evolves toward the overall reduction targets mandated by AB 2446 / AB 43, these incentives will kick in for producers to update EPDs as any carbon reductions are gained.

We appreciate your consideration of these comments.

Sincerely,



Jon Dearing
Vice President, Public Affairs
National Ready Mixed Concrete Company
National Cement Company of California