



The California Air Resources Board

Attn: CARB Staff working to implement Assembly Bill (AB) 2446 and AB 43

Re: ERG Comments on CARBs' Covered Building Material Reporting Information

Dear CARB Staff working to implement Assembly Bill (AB) 2446 and AB 43,

Eastern Research Group, Inc. (ERG) appreciated the opportunity to provide CARB with feedback on the staff proposal to implement reporting requirements for building materials. Much of our comments focus on EPD related aspects of [CARBs' Covered Building Material Reporting Information](#) document. While ERG is still refining our more specific and detailed comments relating to EPD requirements, below are more general comments for CARB's consideration.

CARB's process for seeking data quality improvement

CARB raises concerns with the current data quality of EPDs. While there is room for overall improvements to the EPD ecosystem, and to have technical discussions surrounding data quality concerns, ultimately requirements of EPDs are established through a voluntary consensus standard (VCS) process, specifically through product category rule (PCR) committees. These committees outline sector specific (e.g. cementitious products) requirements for EPDs and are themselves governed by ISO standards. Additionally, the American Center for Life Cycle Assessment (ACLCA) launched V2 of their PCR Standard in July 2025, which seeks to incorporate much of the data quality requirements for EPDs set forth by the U.S. EPA under their former federal program associated with Sections 60112 and 60116 of the Inflation Reduction Act of 2022. There are several VCS interaction points which CARB could engage in to address data quality concerns.

Proposed Solution: We recommend that CARB staff could consider joining existing VCS committees. Specifically, this includes [version 2 of ACLCA's PCR Standard](#), the US Mirror Committees to ISO TC207 and TC59, and PCR committees to raise and provide input on data quality improve sought for sector wide consensus. Participation in these committees will support CARBs program by providing the voice of government in many of these committees and participate in discussions on the implementation of EPD requirements.

“CARB approved default emission factors” / “CARB-approved EPD data”

Based on a cursory review of the support excel files for reporters, as well as the previously mentioned pdf file, we believe that CARB seeks to identify and require that EPDs use “CARB approved default emission factors” and/or “CARB-approved EPD data” (note – both

terms are used within the PDF file, but no discrete definition was found by ERG). However, ERG could not determine based on the documentation (as released) the following:

1. Overall alignment with existing specified datasets from current PCRs.
2. Which datasets the emission factors listed in the excel documentation are coming from.
3. Whether already existing broadly adopted LCI datasets are “CARB approved”.

Proposed Solution: We suggest that CARB provides further documentation, definitions, and general orientation on what is being referred to and proposed as being “CARB approved default emission factors” and/or “CARB-approved EPD data”. Absent this additional step, it is challenging to provide comments related to the level of burden on PCR committees to meet this data.

Additionally, while we are unsure if CARB is presently seeking to identify the following as CARB-approved data, we would recommend that CARB considers referencing free-to-use and publicly accessible unit process LCI datasets for electricity, transportation, and fuels. These datasets are maintained, address concerns raised by the U.S. EPA in Appendix F of the EPA’s PCR Criteria from 2024, are commonly referenced by many PCRs, and outline common processes that are applicable to all materials within the construction sector, ultimately supporting data interoperability and ensuring that common processes are modeled using the same data and assumptions across the construction sector.

- The US Electricity Baseline LCI: https://www.lcacommons.gov/lca-collaboration/Federal_LCA_Commons/US_electricity_baseline/datasets/P...
- Transportation flows from the U.S. LCI: https://www.lcacommons.gov/lca-collaboration/National_Renewable_Energy_Laboratory/USLCI_Database_Pu...
- Fuel flows from the U.S. LCI (and other repositories available on the Federal LCA Commons): https://www.lcacommons.gov/lca-collaboration/National_Renewable_Energy_Laboratory/USLCI_Database_Pu...

Conclusion

In addition to the comments above, ERG has more detailed comments relating to definitions; Sections C-1-a, b, and c; Tables 21, 3, 4; and the Appendix. We look forward to sharing these with CARB in the coming weeks. Please reach out if you have any questions.

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