



April 10, 2026

California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Public Comment on SB 253 Rulemaking

Dear Members of the California Air Resources Board ("CARB"),

On behalf of The Lane Construction Corporation ("Lane"), a subsidiary of Webuild S.p.A ("Webuild"), I appreciate the opportunity to provide stakeholder input on SB253 rulemaking.

Please find enclosed Exhibit A which includes our public comments and recommendations regarding CARB's questions presented at the workshop on March 23, 2026.

Sincerely,

A handwritten signature in black ink that reads "Meagan Sylvia". The script is fluid and cursive.

Meagan Sylvia
Director of Corporate Social Responsibility
The Lane Construction Corporation

Enc: Exhibit A - SB 253 Rulemaking Public Comment

Exhibit A: SB 253 Rulemaking Public Comment

Organizational Boundaries

1. Are there other approaches to organizational boundary setting that CARB should consider?

Parent company Webuild S.p.A. (“Webuild”) has established a reporting boundary for GHG emissions in alignment to the European Sustainability Reporting Standards – ESRS. This boundary covers the parent company, fully consolidated subsidiaries, and the entities over which the parent exercises operational control, even where financial control is not held.

With respect to joint operations, as provided under the ESRS and EFRAG’s Value Chain Implementation Guidance (IG 2), where Webuild does not have operational control, it accounts for the related GHG emissions on a proportionate basis, i.e., applying the same percentage used for consolidation purposes in the consolidated financial statements.

CARB should accept this method, as it is compliant with the ESRS and EFRAG Implementation guidance and substantially aligned with the GHG Protocol.

Accounting Methods

2. What additional information for Scope 1 and 2 reporting should CARB consider in developing the final reporting templates?

The Lane Construction Corporation (“Lane”) provided public comment on the reporting template in a letter dated October 27, 2025. We have no additional comments.

3. What accounting methods does your organization currently use for Scope 1, 2, and 3 GHG estimations?

Lane is preparing to meet SB253 compliance through parent level GHG emissions reporting. Lane’s parent company, Webuild, uses multiple accounting methods, with a hierarchy that prioritizes the activity-based method, then supplier-specific, with limited spend-based. In practice, this results in a hybrid approach which should be accepted.

Emission Factors

4. What criteria should emission factors meet to be used in this program?

Emission factors used for GHG reporting should be transparent, scientifically robust, and aligned with internationally recognized standards. At a minimum, they should be sourced from authoritative or government-recognized datasets, be consistent with the GHG Protocol (including defined

boundaries, scopes, and gases), reflect current conditions where practicable, and be sufficiently documented to support third-party verification and audit.

To ensure both feasibility and accuracy across sectors and geographies, programs should allow the use of high-quality default emission factors as well as validated organization-specific factors.

Consistent with this approach, our parent company, Webuild, applies emission factors from recognized sources such as Government GHG Conversion Factors for Company Reporting (UK Department for Business, Energy & Industrial Strategy – BEIS), CO2 Emissions from Fuel (International Energy Agency), Fourth Assessment Report AR4 (IPCC), Inventory of Carbon and Energy (Bath Inventory of Carbon and Energy - ICE), life-cycle assessment tools, and product-specific Environmental Product Declarations where available, in line with the GHG Protocol, SBTi requirements, and international best practice.

5. How should reporters document and explain their use of a particular emission factor, including proprietary models?

Reporters should clearly disclose the basis for their emission factor selection. At a minimum, disclosures should identify the emission-factor source, the scope and activity covered.

For proprietary or internally developed models, reporters should provide a high-level description of the methodology, inputs, validation process, and governance controls, without requiring disclosure of confidential or protected information. CARB should explicitly allow the use of such models where they are methodologically sound, consistently applied, and subject to internal controls and external assurance, as this supports higher-quality, operation-specific data without compromising intellectual property.

6. How should reporters document and explain when changing EFs from a prior year?

CARB should permit changes to emission factors when such changes improve accuracy or reflect updated science, data availability, or regulatory guidance, provided they are transparently disclosed.

Allowing justified emission-factor updates without penalizing reporters supports continuous improvement in emissions data quality and aligns with established international GHG accounting practices.

Scope 3 Reporting Options

7. Option 1: Broad Applicability - Should reporting entities be able to report as de minimis certain categories due to lack of relevance/materiality and/or feasibility?

Yes, subject to a clearly defined, transparent, and principles-based framework.

8. What specific thresholds, definitions, or decision frameworks should CARB use to determine when a Scope 3 category is considered de minimis to be reported?

At Group level, Webuild conducts a comprehensive assessment of all Scope 3 categories to determine their applicability and explicitly discloses those categories that are not applicable due to the nature of its core business.

For all applicable Scope 3 categories, Webuild applies a materiality-based reporting approach, in alignment with the GHG Protocol and Science Based Targets initiative (SBTi) guidance. Each category is assessed based on its relative contribution to total Scope 3 emissions and the extent to which emissions can be reasonably quantified and influenced through management actions.

In this context, Webuild quantitatively reports only those Scope 3 categories that are material, while categories that are quantitatively immaterial or not relevant are excluded from detailed reporting, with clear justification. In particular, categories are excluded from quantitative disclosure, as their contribution to total Scope 3 emissions is below the Group's defined materiality threshold of 5%, established consistently with SBTi guidance.

This approach ensures that Scope 3 disclosures remain decision-useful, proportionate, and credible, while maintaining a strong focus on the most significant emissions sources.

9. How should CARB weigh reporting flexibility against alignment with current mandatory and voluntary practices and other international standards?

CARB should align closely with existing international frameworks while allowing measured flexibility, particularly during early implementation. Webuild follows the GHG Protocol, ESRS/EFRAG guidance, and SBTi expectations for reporting, all of which recognize that Scope 3 reporting matures over time and allow materiality-based scoping, estimated and hybrid methods, and progressive improvements in data quality.

10. Option 3: Category Phase-In - Are these the appropriate categories to prioritize for initial reporting based on data availability and relevance across sectors?

Lane does not believe CARB should prescribe specific Scope 3 categories for prioritized or phased-in reporting. Scope 3 materiality varies widely by sector and business model, and a fixed list of categories risks requiring reporting of immaterial or non-decision-useful emissions, particularly for construction. Lane supports a principles-based, materiality-driven approach consistent with the GHG Protocol, under which companies determine material Scope 3 categories based on relevance, emissions significance, and data feasibility, with transparent disclosure and phased expansion over time.

Assurance

11. Are there assurance standards or frameworks not currently included in staff's proposed list that should be recognized and why?

Webuild currently obtains limited external assurance on its Consolidated Sustainability Statement, including Scope 1, Scope 2, and Scope 3 GHG emissions, performed by an independent auditor in accordance with international standards for assurance engagements on non-financial information, such as ISAE 3000 (Revised), or equivalent professional standards (such as the Italian SSAE - Standard on Sustainability Assurance Engagement - which explicitly adopts ISAE 3000 (Revised) as its foundational standard). This is supplemented by an annual third-party review of the GHG inventory to support monitoring against Science-Based Targets.

12. Approximately how many GHG assurance engagements can your organization complete annually for limited assurance?

Only one assurance process should be conducted within a company due to the resources required to support the assurance process.

13. What cost ranges are reporting entities currently experiencing for limited assurance engagements?

The annual cost of assurance is \$350,000–\$470,000 USD (€300,000–€400,000).