

# Draft Approach for Stakeholder Input: Implementation of the EPA Label Program for Low Embodied Carbon Construction Materials

*Interagency Sustainability Working Group*

*February 22, 2024*



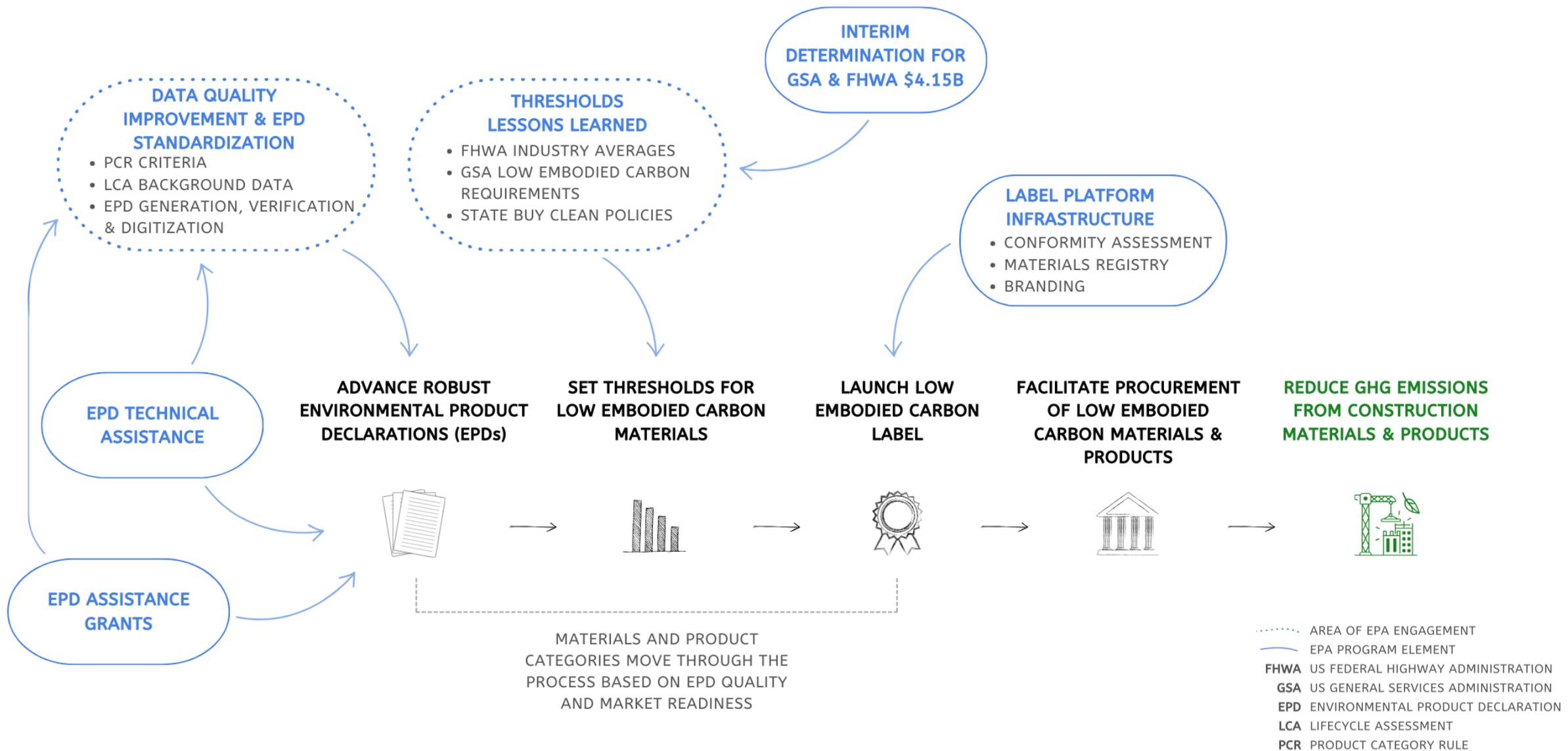
# Guiding Federal Policy

*IRA provisions for reducing embodied carbon – many agencies' efforts depend on EPA's work*

Sec #	Agency	Funding	Purpose	Funds expiration
60116	EPA	\$100M	To develop ( <i>with GSA and DOT-FHWA</i> ) a program to identify and label construction materials/products that have substantially lower embodied carbon	9/30/26
60112	EPA	\$250M	To develop a program to support reporting and measurement of embodied carbon of construction materials/products (grants, technical assistance, etc.)	9/30/31
60503	GSA Federal Buildings Fund	\$2.15B	To acquire and install materials/products for use in the construction or alteration of buildings that have substantially lower embodied carbon ( <i>as determined by EPA</i> )	9/30/26
60506	DOT FHWA	\$2B	To reimburse/incentivize eligible recipients for use of construction materials/ products that have substantially lower embodied carbon ( <i>as determined by EPA</i> )	9/30/26
30002	HUD	\$837.5M	For direct loans and grants to improve climate resilience of affordable housing, including low emission building materials/processes	
70006	FEMA		May provide financial assistance for costs associated with low carbon materials	

# EPA's Low Embodied Carbon Construction Materials Program Approach

Key elements to facilitating procurement of lower embodied carbon construction materials and products



# Scope of Label Program

*Hotspots and materials initially covered*

## Environmental Impacts

- Address GHG emissions in the production stage: LCA Modules A1 - A3
- Consider addressing other key hotspots and/or life cycle stages as label program evolves dependent on data quality and resource availability

## Tiered Labeling Format

- Utilize tiered approach based on learning from EPA Interim Determination; multiple tiers within the label

## Thresholds

- Set thresholds for specific material types within the larger material/product category based on performance criteria

## Construction Materials/Products

- Initially focus on materials covered in Interim Determination (steel construction products, asphalt mixtures, concrete mixtures, glass)
- Consider other materials as relevant and if/when the opportunity arises

# The Label Program Approach

*A phased approach to ensure data quality of labeled materials*

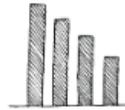
ADVANCE ROBUST  
ENVIRONMENTAL PRODUCT  
DECLARATIONS (EPDs)



## Phase I: Data Quality Improvement

- Draw on existing data improvement efforts: Improve LCA Data Commons, Background LCA data & fill data gaps
- Determine PCRs meeting EPA's PCR criteria
- Collect third party verified EPDs developed under approved PCRs

SET THRESHOLDS FOR  
LOW EMBODIED CARBON  
MATERIALS



## Phase II: Threshold Setting

- Develop thresholds for each product/material type
- Shape thresholds considering performance requirements, regionality, and viable industry averages
- Finalize thresholds informed by stakeholder input via NOI

LAUNCH LOW  
EMBODIED CARBON  
LABEL



## Phase III: Labeling

- Certify materials meeting thresholds via EPD review
- Launch publicly accessible registry of certified materials
- Highlight certified materials in other platforms, federal programs, and procurement standards

# The Label Program Approach

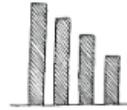
*Materials/products move through the process at varying speeds*

ADVANCE ROBUST  
ENVIRONMENTAL PRODUCT  
DECLARATIONS (EPDs)



**Phase I: Data Quality Improvement**

SET THRESHOLDS FOR  
LOW EMBODIED CARBON  
MATERIALS



**Phase II: Threshold Setting**

LAUNCH LOW  
EMBODIED CARBON  
LABEL



**Phase III: Certifying & Labeling  
Materials and Products**

Material A (faster)

Material B (intermediate)

Material C (slower)

# Envisioning Success Across Phases I, II, & III

Label Program Phase	Indication of Successful Completion of Phase
<b>Phase I: Data Quality Improvement</b>	<ul style="list-style-type: none"><li>✓ A material category has a PCR that aligns with EPA's PCR Criteria</li><li><b>AND</b></li><li>✓ The same material category/type has a representative number of robust, publicly available EPDs developed in accordance with that PCR.</li></ul>
<b>Phase II: Threshold Setting</b>	<ul style="list-style-type: none"><li>✓ A material category and its respective types have successfully completed Phase I and Phase 2 processes and have thresholds published by EPA.</li></ul>
<b>Phase III: Certifying &amp; Labeling Materials and Products</b>	<ul style="list-style-type: none"><li>✓ A material or product category/type has successfully completed Phase I, II, and III processes, and is considered for certification under the label program.</li></ul>

## Planned Next Steps

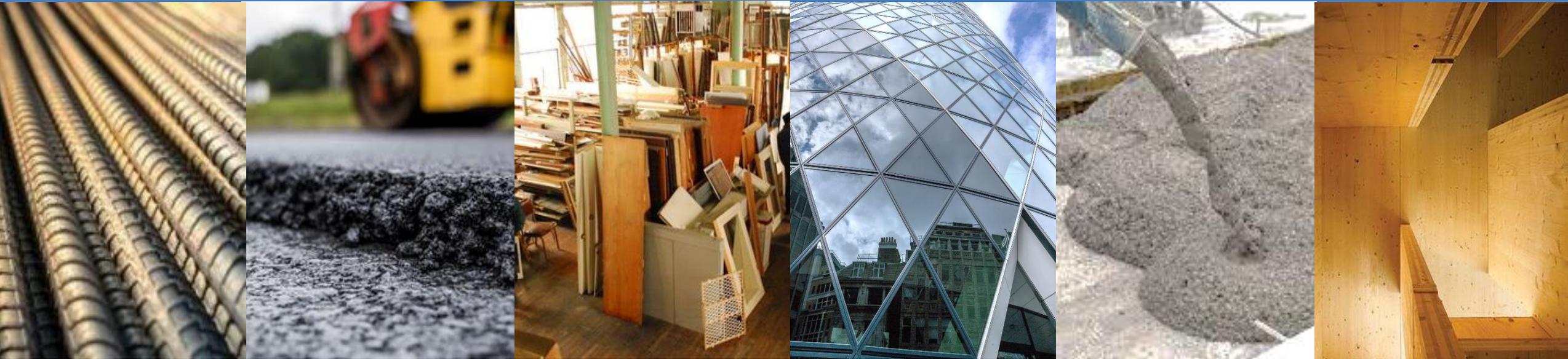
DATE	ACTION
February 27th, 2024	Public Webinar on the Draft Label Program Approach - Register to attend at: <a href="https://www.zoomgov.com/webinar/register/WN_UK3t7WwXToiRNIYFlmI7CA#/registration">https://www.zoomgov.com/webinar/register/WN_UK3t7WwXToiRNIYFlmI7CA#/registration</a>
March 2024	Public Webinar - EPA's Efforts to Enhance Product Category Rules for Environmental Product Declarations
March 15, 2024	Deadline for Public Comment on Draft Label Program Approach
June 2024	Goal for Publishing Final Label Program Approach

- Underway:
  - Engaging in Updates to PCRs
  - Improving data quality in EPDs and expanding availability of EPDs
  - Evaluating applications for EPD Assistance Grant (up to \$100M funding for 2024)
  - Providing contractor supported EPD technical assistance

# How to Further Engage with EPA on the Label Program

- **Check out these additional resources:**
  - [EPA Press Release](#) providing summary of the Draft Label Program Approach
  - Link to the EPA Label Program for Low Embodied Carbon Construction Materials Website: [epa.gov/greenerproducts/label-program-low-embodied-carbon-construction-materials](https://www.epa.gov/greenerproducts/label-program-low-embodied-carbon-construction-materials)
- **Share the opportunity to comment** on the Draft Label Program Approach with your partners!
  - <https://www.federalregister.gov/d/2024-03083>
- **Join our Label User Group!**
  - And/or recruit your key partners to join!
  - EPA will rely on this group to help ensure the registry of certified materials and other label program components best meets federal purchaser needs
  - To join, send an email to Johanna Anderson at [anderson.johanna@epa.gov](mailto:anderson.johanna@epa.gov)
- **Send any questions** to [embodiedcarbon@epa.gov](mailto:embodiedcarbon@epa.gov)

# THANK YOU!



[epa.gov/greenerproducts](https://epa.gov/greenerproducts)

[epa.gov/greenerproducts/label-program-low-embodied-carbon-construction-materials](https://epa.gov/greenerproducts/label-program-low-embodied-carbon-construction-materials)