



NATIONAL STONE, SAND
& GRAVEL ASSOCIATION

February 9, 2023

RE: Letter in Response to the General Services Administration Inflation Act Low Embodied Carbon Materials Standards

Dear Low Embodied Carbon Task Force Members:

On January 25th, 2023, the General Service Administration (GSA) released for comment the GSA developed minimum requirement standards for Inflation Reduction Act (IRA) funded purchases of materials and products with substantially lower embodied carbon based on, and in accordance with, EPA's Determination under Section 60503 of IRA.

The National Sand, Stone and Gravel Association (NSSGA) appreciate the opportunity to comment on the GSA developed standards to promote the procurement of materials and products available today with the comparatively lower embodied carbon. The NSSGA's represents aggregates producers, as well as those who manufacture equipment and provide services that support the construction industry. Our members are essential to the work that keep this country moving and we represent more than 90 percent of the crushed stone, 70 percent of the sand and gravel produced annually in the United States. Our members employ more than 100,000 hard-working people who are responsible for the essential materials found in every home, building, port, road ,dam and public works project.

Our industry members are committed to taking all reasonable steps to reduce greenhouse gas emissions, while supplying essential materials. Our greenhouse gas emissions are inherently low due to the characteristics of our products and processes. Most of the emissions come from the transportation of material. Therefore, NSSGA supports policies that promote local sources of aggregates, which results in lower greenhouse gas emissions. Aggregates are an important tool in creating resilient infrastructure to combat climate change, with uses such as flood control and water treatment.

We are concerned that GSA's lower embodied carbon (LEC) standard to procure LEC materials under Sec. 60503 of the IRA does not reflect third-party reviewed and verified standards and does not include stakeholder input. The roughly two-week comment period for this standard is wholly inadequate to respond to GSA's proposed standard.

We strongly believe that GSA should rely on Environmental Product Declarations (EPD) based on Product Category Rules (PCR). Our industry members have invested considerable time, money and energy developing EPDs for our products for a number of years. The facility-specific and material



specific “cradle-to-gate”, third party verified EPD is the superior standard for GSA to use in procurement under Sec. 60503. The GSA in fact published Concrete and Asphalt specifications requesting EPDs at installation on March 30th, 2022.

The development of facility and product specific EPDs are already under development, and deference must be given to those industry efforts to ensure that the variety of factors impacting a particular product’s EPD are accurate and can be used in LCA with reduced concern of inaccurate LCA procurement decision making. Otherwise, the goal of the procurement standard which GSA is pursuing will be defeated.

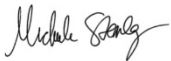
The GSA instead proposes to apply a statistically arbitrary EC3 “Uncertainty Adjustment Factor” to each EPD in an effort to capture the product’s “Global Warming Potential” among other factors. The EC3 approach applies default values to EPDs which can lead to inaccurate life cycle analysis (LCA) conclusions. While the EC3 tool has the potential in the future to provide uncertainty quantification for LCA analysis, it currently lacks the data set quality and quantity requirements to be considered an authoritative, or beneficial, LCA tool.

The “uncertainty factor” that GSA seeks to adjust with the EC3 tool is already a feature of EPD development under LCA analysis. With adherence to Product Category Rules, and use of high-quality data sets, the “adjustment” GSA seeks is better accomplished with higher accuracy using an EPD standard without layering an arbitrary “adjustment” GWP value upon the material or product.

It is important that the standard GSA employs incorporates the international standards, technical methods for LCA. It is counterproductive for GSA to develop a standard for this procurement that employs any arbitrary adjustment to LCA values. Such an approach sets back the considerable work industry has undertaken, and continues to undertake, to establish scientifically validated measurements for carbon footprints, environmental labeling, EPDs PCS and LCA database development. Such an outcome is counterproductive to the purpose the funds made available under Sec. 60503.

NSSGA appreciates the opportunity to provide feedback on the Low Embodied Carbon Material Standards and look forward to working with you on addressing these open issues.

Sincerely,



Michele Stanley
Vice President, Government and Regulatory Affairs
National Stone, Sand & Gravel Association

