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Embodied Carbon Policy Trends and Alignment Opportunities

COLLEGE OF BUILT ENVIRONMENTS
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This knowledge brief provides an overview of (RCW 39.116.050):

1. Emerging and foreseeable trends in local, state, federal, and private policy on embodied carbon and the procurement and use of low carbon materials, and
2. Opportunities to promote consistency across public and private embodied carbon and low carbon materials policies, rules, and regulations.

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Table of Contents

Policy trends **3**

Financing and Incentives 3

Procurement 4

Continued expansion of Buy Clean policies 4

Advanced Purchasing Commitments 5

Building Regulations 6

Expansion of whole building LCA-based policies 6

Embodied Carbon in Codes 6

Carbon Pricing 7

Cap and trade programs 7

Clean product standards 8

Opportunities to promote consistency across embodied carbon policies **10**

Measurement and Data 10

1. Use common measurement methods 10

2. Increase the use and development of public data 11

3. Maintain public EPD repository and replicable EPD tracking solution 11

4. Encourage digital EPDs 12

5. Use common reporting 12

6. Use common baselines 13

7. Connect supply and demand side policies 14

Collaboration and Resources 14

1. Integrate with voluntary certifications and labels 14

2. Maintain forums for collaboration 15

3. Develop and use model legislation/code /model specs 15

4. Develop training resources 15

Policy trends

This section provides an overview of emerging and foreseeable embodied carbon policy trends across financing, incentives, procurement, building regulations, and carbon pricing.

Financing and Incentives

Financial incentives can help drive innovation and faster decarbonization. They provide an opportunity for manufacturers and project teams to be rewarded for early adoption and investment in embodied carbon measurement and reduction strategies.

Incentives are integrated in a wide range of embodied carbon programs at the state and local levels that include both product and building-level approaches to reductions, such as:

- **Tax Incentives:** As of July 2024, construction materials that are eligible for Buy Clean Colorado are now exempt from the Colorado Sales and Use tax. This exemption has also been proposed in NY Senate Bill S07648, alongside a state-maintained registry of eligible materials. New Jersey passed a Low Embodied Carbon Concrete Leadership Act that includes a tax credit of up to 8% of contract cost for companies that supply ready mix concrete below an established GWP threshold.
- **City-level Permitting and Incentive Programs:** Local land use codes and permitting provide opportunities for incentivising developers and building owners to build greener. For example, Seattle's Green Building Permit Incentives allow additional development capacity for developers that meet embodied carbon and other criteria established in the Green Building Standard. Denver's new Embodied Carbon Pilot Program provides project support and funding for eligible new commercial building projects.
- **Oregon Low Embodied Carbon Housing Incentive Program:** This new program will offer $25.6 million in incentives for low embodied carbon housing for adaptive reuse or space-efficient housing projects that also reduce their global warming potential (GWP) by 10%, offering four different pathways for compliance.
- **Commercial Property Assessed Clean Energy (C-PACE) financing:** C-PACE programs provide financing with no money down that is repaid as a benefit assessment on the property tax bill over a term (typically ~20-30 years) for new construction or upgrades that meet performance criteria established by the state. Historically, these programs have focused on energy efficiency, water conservation and renewable energy projects. However, Colorado SB-182 was signed into law in May 2025, making Colorado the first state to allow embodied carbon improvements to qualify under the state's C-PACE program. Pace Equity's CIRRUS C-PACE Financing Zero Carbon also now includes an embodied carbon approach, and RMI is launching a C-PACE Model Policy Primer based on public sector workshops across 2025.

- **Incentive Package Bills**: New York and New Mexico have both introduced bills in the 2025 and 2026 sessions that include a package of incentives. For example, New Mexico's HB 153 established rebates (up to $500,000/project) for purchasers of low carbon products with EPDs and HB 320 provides direct manufacturing grants for decarbonization improvements to manufacturing facilities.

There are also many opportunities to include incentives into procurement programs that could be considered, such as:

- **Bid Scoring**: During GSA's Buy Clean pilot projects, GSA gave contractors with concrete, steel, glass, and asphalt materials in the best 20% of a product type – a perfect score for technical evaluation. This rewarded those contractors with all available points for 15% of the total evaluation – providing a large competitive edge – while still allowing GSA to evaluate several key factors.
- **Bid Price Allowances**: Agencies can provide price allowances for products meeting specific criteria. For example, Oregon's procurement laws (ORS 279.570) provide a preference for recycled materials and allow for a 5% price increase for products that meet their definition of including recycled content. This same concept can be applied to products that have EPDs compliant with a specific GWP threshold.
- **Two-tiered Incentive Approach for Buy Clean:** Historically, Buy Clean policies have typically set a maximum GWP limit. However, as described by Dell (2020), Buy Clean could also include a "second, much more stringent, threshold that applies only to a small portion of projects or material quantity. This second threshold would reserve a portion of the public purchasing to commercialise practices that are better than any currently available practices. It would function very much like Renewable Portfolio Standard (RPS) policies did before 2010: providing guaranteed, bankable lead markets that could justify significant private-sector investment in at-the-time relatively high-cost technologies."[1]

Procurement

Continued expansion of Buy Clean policies

Seven states (WA, OR, CA, MN, CO, NY, MD) now have low-carbon construction materials procurement policies – often referred to as Buy Clean – and this trend is expected to continue.

While every program varies, Buy Clean policies typically set GWP limits per unit of product for major materials like concrete, steel, asphalt, and insulation. Environmental product declarations (EPDs) are required to encourage transparency and also demonstrate compliance with the chosen limit. Many Buy Clean programs have associated incentives, such as EPD grants or tax credits.

[1] Dell, R. (2020). *Build Clean: Industrial Policy for Climate Justice*. ClimateWorks. https://www.climateworks.org/report/build-clean-industrial-policy-for-climate-and-justice/

Once available, Buy Clean programs are likely to integrate the use of labels to simplify the procurement process. The US EPA began developing an embodied carbon label with IRA funding, and there is private sector interest in building on this effort.

Advanced Purchasing Commitments

Advanced market commitments (AMCs), buyer's clubs, and similar purchasing commitments are demand-side tools used by governments and the private sector to commit to purchasing a specified quantity of a product at an agreed price if it meets defined performance criteria. These commitments aim to reduce market risk for producers, helping emerging or high-cost technologies scale faster.

Generally, AMCs are used in circumstances where the cost of developing a new product is too high to be worthwhile for the private sector without a guarantee of a certain quantity of purchases in advance. The key to AMC's success is that private markets take on the R&D cost to develop a product, while the government provides an assurance of a sufficient initial market to enable a potential return on investment even before an organic market develops.[2]

Government AMCs have been highly successful in the vaccine industry. Climate change, similar to vaccines, is well-suited to AMCs because the true cost of climate change is not reflected in today's market prices.[3] However, to date, AMCs for low carbon steel and cement are only present in the private sector. California legislators proposed CA SB 1073 in 2024, enabling the government to purchase low carbon cement or concrete products up to 10 years in advance, but the bill did not pass.

Recent examples from the private sector include:

- RMI and Green Market Activation (GMA) launched the Sustainable Concrete Buyer's Alliance in 2025 with founding members Amazon, Prologis, and Meta, building off a year-long development process for a book and claim system for cement and concrete.
- Global Cement and Concrete Association (GCCA) also launched a book and claim system.
- Microsoft signed a long-term agreement for Sublime Cement and secured procurement rights for Fortera's ReAct low-carbon cement and associated environmental attribute certificates (EACs).
- Amazon signed an agreement with Brimstone to reserve future volumes of their product.

Purchase agreements are partially in response to the growing pressure for companies to be accountable for their Scope 3 emissions, which include the emissions from purchased construction materials. For example:

- California's Climate Corporate Data Accountability Act (CCDAA) requires large companies to disclose their Scope 3 supply chain emissions beginning in 2027, meaning companies need to collect this data in 2026.

[2] Ho, A. & Taylor, J. (2021). *Using Advance Market Commitments for Public Purpose Technology Development.* Harvard Kennedy School Belfer Center for Science and International Affairs.
[3] Ibid.

- Science Based Targets Initiative (SBTI) now requires companies to set and meet scope 3 targets if Scope represents over 40% of their total emissions.

Building Regulations

Expansion of whole building LCA-based policies

Building-level embodied carbon policies typically require projects to meet an embodied carbon budget that establishes a maximum allowable GWP per unit of floor area (e.g. $kgCO_2e/m^2$) or a reduction target (e.g. 10% reduction from a reference building). Compliance is determined based on the results of a whole building LCA, which typically covers structure and enclosure, at a minimum.

In Europe, WBLCA policies are widespread. The Netherlands was the first to require whole life carbon limits in 2018, followed by France (2022) and Denmark (2023); Sweden, Norway, Iceland, Finland, Estonia, and Spain have disclosure requirements in force or in development.[4] In 2028, building GWP disclosure will be required across the European Union via the Energy Performance of Buildings Directive.

Canada has also been an early leader in building-level embodied carbon policies. Vancouver's Building By-laws require disclosure of WBLCA results and compliance with a GWP limit or percentage reduction target. Nationally, Canada's *Standard on Embodied Carbon in Construction* requires disclosure of GWP on public projects across all federal agencies, and embodied carbon is a big focus of the Greening Government Strategy. In 2025, the Canadian National Model Codes Committee launched a task group on embodied emissions that is responsible for recommending code changes to address embodied carbon in new buildings as part of the 2030 National Model Codes development process.

In the US, LEED and individual company policies have been the largest drivers of WBLCA practice to date, with LEEDv5 increasing the credits and focus on whole building embodied carbon assessments. In policy, WBLCA disclosure and reductions are one of three pathways for compliance in CALGreen's embodied carbon requirements. New York State's Executive Order 22 also includes project disclosure and reductions for public projects, and NYS is expected to release EO 22 Project LCA Guidance in 2026.

Embodied Carbon in Codes

Building and energy codes are an attractive complement to public Buy Clean policies because they cover private sector construction, regulate the entire market, and have been a proven pathway for increased energy efficiency in buildings.[5] Similar to energy, there isn't a single

[4] BPIE (Buildings Performance Institute Europe) (2024). *How to establish Whole Life Carbon benchmarks: Insights and lessons learned from emerging approaches in Ireland, Czechia and Spain.* Available at: https://www.bpie.eu/publication/how-to-establish-whole-life-carbonbenchmarks-insights-and-lessons-learned-from-emerging-approaches-in-ireland-czechia-and-spain/

[5] U.S. Department of Energy (USDOE). (2023). "DOE Building Energy Codes Program Infographics" [webpage]. https://www.energycodes.gov/infographics

policy pathway that alone can accomplish the reduction goals needed to meet climate change reduction targets. For example, energy is regulated at the utility-scale, building scale, product scale, and through cap and trade programs at the state level. The embodied carbon of building materials needs a similar multipronged approach.

CalGreen (Title 24, Part 11) was the nation's first mandatory green building code to include embodied carbon requirements. As of July 1, 2024, large commercial and school buildings must reduce embodied carbon through (1) building reuse, (2) achieving WBLCA-based reduction targets, or (3) meeting product GWP limits. ASHRAE 189.1/IgCC, the Denver Green Code, and Marin County's building code also include embodied carbon language.

In most of these cases, product GWP limits are set for a specific set of materials and EPDs are required to demonstrate compliance. In the ASHRAE/IgCC code, the code remains material agnostic and focuses on reporting, requiring thirty EPDs from not less than twenty different building products, which together must equal 25% of total product costs. The CALGreen code EPD compliance pathway requires EPDs for structural steel, rebar steel, flat glass, mineral wool insulation, and ready-mix concrete. The product GWP has to be less than 175% of the industry average GWP (as reported in the industry-average EPD) in each respective category, with more stringent tiers available for jurisdictions to adopt.

There are many ongoing proposals to update state and model codes, such as a voluntary appendix to Washington's building code and multiple proposals to the IBC and IECC. In early 2026, the ICC Board determined that Embodied Carbon provisions will be limited to IgCC and IECC in model codes, so future efforts will be limited to these model codes.

Carbon Pricing

Cap and trade programs

In a cap-and-trade system, the government sets an emissions cap and issues emission allowances consistent with that cap. Emitters covered by the program must hold allowances for every ton of greenhouse gas they emit. Companies may buy and sell allowances, establishing a market and emissions price. The key component to carbon reductions is the issuance of fewer allowances over time (the cap gets smaller).

Among other West Coast states, Washington has a Cap and Invest policy regulating emissions from businesses with annual GHG emissions over 25,000 metric tons. There are several construction materials regulated under this supply-side program, such as select metals, wood products, cements, and gypsum wallboard. All of these facilities are considered Emissions Intensive and Trade Exposed (EITE) industries, which receive free allowances but are subject to a declining emissions cap and a decrease in the number of free allowances provided over time. EITE industries in other geographies are sometimes not required to comply with the cap at all - instead providing plans to follow the best available emissions technology practices.

A carbon border adjustment mechanism (CBAM) is an emerging policy framework that complements cap and trade programs and aims to protect domestic industry without sacrificing progress on industrial decarbonization. As of January 2026, imported products – including cement, steel, and other key sectors – will now be subject to CBAM, which essentially applies the caps established by the EU Emissions Trading Scheme (ETS) on imported products. Imported materials exceeding the GWP limits set by the EU will now have to pay a fee to be exported to the European Union. Several bills have already been proposed federally to create a CBAM for the United States.

When it comes to regulating embodied carbon, there are two main challenges with supply-side policies like Washington's Cap and Invest: 1) imports are not subject to the same regulation, creating an unbalanced regulatory burden on Washington manufacturers— especially EITE industries; and 2) for industrial facilities, Cap and Invest programs only count scope 1 and 2 emissions, ignoring the upstream Scope 3 supply chain emissions of raw materials. This results in undercounted emissions and a smaller scope of decarbonization strategies available to the regulated industry. While free allowances for EITE industries and CBAM policies aim to address the first issue, the second issue is currently not addressed.

Clean product standards

A clean product standard (CPS) is a regulatory policy that can be applied to the manufacturers of building products within a state, region, or country. The policy sets an emissions intensity benchmark that decreases over time — effectively regulating the efficient production of building materials. A CPS policy regulates production efficiency but does not put a total cap on emissions within a geography.

Companies selling or importing the products covered by the policy must comply with the standard. Companies either receive or surrender credits based on the emissions intensity of their product relative to the established benchmark. Credits can also be bought or sold - providing a financial incentive to continue emissions reductions. The standard established by this policy works best alongside other policies, such as investment in research and development, additional financial incentives, technical assistance and procurement policies like Buy Clean.[6]

The key to emissions reductions for the policy is lowering the emissions intensity over time. The policy prevents leakage (companies shifting production to non-regulated geographies) by applying to imports. For CPS, EPDs can be used to establish the baseline emissions intensity metric and serve as the compliance instrument, similar to Buy Clean.

This policy approach has already been successfully utilized in the fuels market through a Clean Fuel Standard, which is currently being implemented in California, Oregon, Washington, and across all of Canada. Research indicates that the "CFS policies in California, Oregon, and British Columbia have each helped to reduce GHG emissions to date, and forward-looking

[6] Fransen, T., Lebling, K., Weyl, D., & Kennedy, K. (2021). *Toward a Tradable Low-Carbon Cement Standard: Policy Design Considerations for the United States.* World Resources Institute.

modeling indicates that a strong LCFS can play an additive role in a policy mix seeking deep GHG mitigation." [7]

A CPS has strong potential to complement a Buy Clean policy and co-utilize EPDs. California, Senate Bill 43 allows the California Air Resources Board (CARB) to establish an embodied carbon trading system – effectively paving the way for a clean product standard to be introduced in California. California was also the first to establish a low-carbon fuel standard.

[7] Axsen, J., & Wolinetz, M. (2023). What does a low-carbon fuel standard contribute to a policy mix? An interdisciplinary review of evidence and research gaps. *Transport Policy, 133*, 54–63. https://doi.org/10.1016/j.tranpol.2023.01.008

Opportunities to promote consistency across embodied carbon policies

Promoting consistency can help embodied carbon policies scale their impact and achieve their goals. This section covers strategies to promote consistency through improvements in measurement, data, collaboration, and resource development.

Measurement and Data

The majority of the policies highlighted in this *Brief* rely on life cycle assessment (LCA)-based measurement methods. LCA international standards exist, but are often too broad to provide consistent measurement methods for regulatory policies. Regulatory policies that use LCA for decision-making need consistent measurement methods and data to provide fair comparisons to policy limits or requirements. This section focuses on 7 strategies to promote consistency in measurement and data.

1. Use common measurement methods

For **products**, standards such as product category rules (PCRs) aligned with ISO 21930 can provide consistent measurement within a product type, but additional work is required to make PCRs more comparable across product categories. EPA published PCR criteria as a precursor for their originally planned labelling program, and provides a good basis for PCR harmonization. PCR improvements are now being coordinated through an ACLCA effort in the development of their PCR Standard, 2.0. ERG is also building off of the US EPA and ACLCA efforts to develop a label that recognizes high-quality EPDs.

For **buildings**, standards like the forthcoming ASHRAE 240p will provide a standard for quantifying embodied carbon. In the meantime, SEI published a pre-standard for assessing the embodied carbon of structural systems and cities like Vancouver, BC, provide detailed guidance on conducting building LCAs.

Initial Recommendations

- Consider EPD reporting requirements that create more consistency across covered products in WA, such as requiring supply chain specificity (SCS) percentages on all EPDs (even though only some PCRs require the SCS reporting).
- Participate in PCR committees and ACLCA PCR standard 2.0 development to promote consistency within and across product standards.
- Evaluate use of the ERG label for high-quality EPDs (currently under development)
- If adopting a WBLCA-based policy, utilise published standards to increase consistency in modelling.

2. Increase the use and development of public data

Publicly accessible, transparent, and accurate data is a cornerstone in providing more consistency for policies and regulations that rely on LCA for decision-making and comparisons. This need is not unique to embodied carbon policies: climate policies across different geographies benefit from publicly accessible data. For example, low-carbon fuel standards in WA, OR, and CA rely on the freely accessible, federally maintained GREET database for fuels.

The Federal LCA Commons provides a wide variety of LCA data and a solid basis to help support data access across policies. EPA published plans to update Federal LCI datasets in August 2024, but those plans have stalled under the current administration.

Initial Recommendations

- Consider pooling funds with other interested governments to support select portions of EPA's plans to update Federal LCI datasets, using existing networks like the PCC.
- Emphasize the value of utilizing public data in existing and future policies.
- Provide updated reporting standards that signal a preference towards publicly available data.

3. Maintain public EPD repository and replicable EPD tracking solution

Free access to published EPDs promotes consistency by affording equitable access to project teams seeking EPDs. The majority of North American EPDs can be found in Building Transparency's Embodied Carbon in Construction (EC3) free EPD database, as well as paid databases like One Click's Material Compass.

Public and private procurement entities with Buy Clean requirements need to collect quantities, EPDs, material application, and project type for purchased quantities to track compliance. These factors (among others) are important for benchmarking performance against the policy goals and identifying opportunities for carbon reductions on individual products or project types. Typically, agencies have added EPD tracking onto an existing material tracking program with varying degrees of success.

Washington State is the first state with dedicated authority and funding to develop what could become a replicable EPD tracking solution for other government or private green procurement initiatives. If other states build off of Washington's work, this will support more consistency for manufacturers providing data to different procurement entities.

Initial Recommendations

- Utilize publicly accessible EPD databases to identify EPDs for use on state projects and when providing training.
- Continue to develop the BCBF database with consideration of how other agencies within and outside of Washington might utilize a similar solution to promote more consistency across policies.

4. Encourage digital EPDs

Digital EPDs make EPDs more useful to project teams, verifiers, regulators, and tools that utilize EPDs as input data, can reduce errors caused by scanning or manually transferring EPD results from PDFs to more usable digital formats, and could simplify procurement databases tracking EPDs. An ACLCA working group is working towards recommending language for PCRs to require digital EPD reporting. Fortunately, an open digital reporting format already exists through openEPD and can be utilized immediately.

The creation of more digital EPDs may scale alongside efforts to develop more EPD generator tools. EPD generator tools have the potential to increase EPD development access and speed, and lower the costs to create EPD for manufacturers.

Initial Recommendations

- Encourage the submission of digital EPDs.
- Consider updated reporting requirements that phase in requirements for digital EPD submittal using the openEPD format.

5. Use common reporting

Common reporting reduces burdens on manufacturers or project teams that operate in different regions and may be subject to multiple embodied carbon policies.

For **products**, clear definitions and requirements for the type of EPD being requested are a helpful signal to manufacturers. Although PCRs differ in the nomenclature for EPD types, ACLCA's recently published guidance can help guide policy. There is also a need to establish a unique EPD numbering scheme for better tracking and verification. Although some PCRs are starting to develop PCR-specific guidance, reporting EPDs digitally via openEPD (as noted above) can create both unique tracking IDs and a much more useful EPD format, especially for product types that frequently update their EPDs with new versions.

In the longer term, EPA's vision for a low-carbon product labelling program would provide a simpler form of consumer-facing reporting while still maintaining a rigorous and more aligned EPD reporting framework as a basis for the label.

For **buildings**, a common reporting schema can allow reporting of WBLCA results into both compliance and voluntary programs. It also provides the framework for a common and centralized database— allowing for the development and refinement of large sector benchmarking efforts. The Embodied Carbon Harmonization and Optimization (ECHO) project, a coalition of over 15 organizations requiring or collecting building LCA reporting, developed a common reporting schema to align efforts to collect project-level data. To build on the ECHO schema, the CLF also published a generic reporting template for whole-building LCA results, which can be modified to fit individual policies.

Initial Recommendations

- Clearly define the acceptable EPD types in updated BCBF reporting guidance based on ACLCA's guidance.
- If adopting a WBLCA-based policy, utilize existing schemas for reporting.

6. Use common baselines

Baselines are values against which comparisons can be made. They are important reference points in policy and are often required as a basis for measuring progress towards the policy reduction goals.

At the **product** scale, the CLF publishes material baselines every other year, with the most recent version published in 2025. CLF Material Baselines represent an estimate of the industry average greenhouse gas intensity of construction products manufactured in North America. CLF Baselines are referenced as data sources in tools, programs like LEED v5, and are often used as a starting place for GWP limits in private sector procurement policies and Buy Clean. CLF Baselines are static snapshots of the industry's GHG intensity and are primarily based on published industry average EPDs.

At the **building** scale, CLF recently published Building Benchmarks for a variety of building types. This is the best available building benchmark dataset in North America and can serve as a basis for policymaking. As WBLCA reporting and standardization continues, building benchmarks can be validated and/or updated over time.

At the **economy** scale, a consumption-based greenhouse gas inventory (CBEI) is an accounting method that can be applied to a region, including a state, that counts emissions associated with all goods and services consumed by a state, regardless of their origin. CBEIs are helpful to establish the relative contribution of embodied carbon within a region and understand the magnitude of total emissions. Results can be used in a variety of policy applications. The State of Washington is in the final stages of publishing a CBEI, and local governments like King County and the City of Seattle have already published CBEIs. Finally, the USEPA has already published initial CBEIs for every state, and California is proposing to use its CBEIs to establish a sector-wide baseline for embodied carbon impacts in California.

For **imports**, establish default values and hold importers to the same reporting standards as local manufacturers.

Initial Recommendations

- Publish Washington's CBEI.
- Utilize CLF Material Baselines and Building Benchmarks to inform future product and building scale policy.
- When setting baselines, be aware of differences in the measurement methods between baselines and policy reporting.

7. Connect supply and demand side policies

Supply and demand side policies – such as cap and invest (supply) and Buy Clean (demand) – share the goal to reduce emissions from construction materials but differ in measurement and compliance. Alignments in the measurement and reporting of these policies could reduce the reporting burden for manufacturers and allow policies to be more complementary.

Differences in scopes, data sources, and calculation methods are barriers to scaling embodied carbon reductions through policy. Specifically, the product level EPD reporting (demand side) needs better alignment with facility level reporting, which is common among state regulatory programs (supply side).

Initial Recommendations

- Research and compare the measurement and data requirements of Washington's Cap and Invest policy with the BCBF EPD policy.

Collaboration and Resources

Policymakers, including those implementing the policy, benefit from collaboration with other policymakers to provide more efficiency in meeting the policy goals with fewer burdens for those who need to comply.

1. Integrate with voluntary certifications and labels

Voluntary building and infrastructure certification programs are testing grounds for future regulatory policies. For example, embodied carbon measurement and reduction were integrated into the USGBC's LEED green building rating system as early as 2013, which included EPD and WBLCA reporting. The Envision rating system for sustainable infrastructure projects awards embodied carbon credits, and the Built Green program also has embodied carbon credits.

Policies can integrate voluntary certifications and labels through requiring projects to comply with specific credits from a rating system (as a part of a broader requirement to achieve a level of green building certification), or can simply choose to review and align policy reporting requirements with a rating system. The benefit of the first example is that compliance review falls on the certification system, rather than the regulating entity.

Initial Recommendations

- Review state LEED requirements for public buildings and consider requiring specific embodied carbon credits as a means to test and ready the market for future regulations.
- When building or product scale regulations are developed, build off of existing rating systems to the extent possible.
- Educate design and procurement teams on how Buy Clean Buy Fair connects to new requirements, such as the embodied carbon prerequisite in LEEDv5.

2. Maintain forums for collaboration

Policies evolve and improve through the measurement of their effectiveness and the sharing of best practices across regulating entities. Policymakers have options to participate in forums like the Pacific Coast Collaborative (PCC), the US Climate Alliance's Federal-State Buy Clean Partnership Convenings, and FHWA's Sustainable Pavements Workgroup. While FHWA's workgroup is not currently being convened, a similar forum may emerge in the future.

Additionally, collaboration with industry associations affected by the policies is crucial. In addition to direct consults, participation in industry-specific conferences to share policies and get feedback is common.

Initial Recommendations

- Continue to participate and fund priority work through the PCC.
- Continue to participate in cross-state collaboration forums as time and resources allow.

3. Develop and use model policy language and specifications

WA Commerce has already developed model specifications to help support policy implementation. They were developed with commentary that helps adapt the specifications to other geographies or policies, so other procurement entities can support consistency through adapting and using these specifications. Model Buy Clean (and other) legislation does not exist for embodied carbon and could provide more consistency across policies.

4. Develop training resources

Training on embodied carbon and LCA concepts is a helpful way to provide consistency across policies. Training that guides how to comply with specific policies can support more consistent practices across projects within the state.

WA Commerce has already developed training videos to help support broad embodied carbon training concepts. As the BCBF policy develops, more specific training on finding EPDs, using the reporting database, and strategies to reduce embodied carbon on projects may be helpful.

Initial Recommendations

- Develop and implement training resources as needs arise (for example: provide a video detailing how to submit to Washington's developing BCBF database). To the extent practical, make training applicable for additional jurisdictions.