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NATIONAL GLASS ASSOCIATION GLASS ASSOCIATION OF NORTH AMERICA
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Buy Clean California AB262 and 1817

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Acronyms

DGS – Department of General Services
GWP – Global Warming Potential
EPD – Environmental Product Declaration
PCR – Product Category Rules



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Assembly Bill 262 and 1827



Requirement: Facility Specific EPDs for selected products must have GWP below their compliance limits (defined by DGS)

Structural Steel

- Hot rolled sections
- Structural sections
- Plate



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Assembly Bill 262 and 1827



Carbon Steel Rebar

- Plain carbon-steel bars for concrete reinforcement
- Plain low alloy steel bars for concrete reinforcement



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Assembly Bill 262 and 1827



Mineral Wool Insulation

- Low and high density mineral wool board from rock and slag



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Assembly Bill 262 and 1827



Flat Glass

- Clear or tinted float and rolled glass without additional processing



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DGS Methodology

1. Collected existing EPDs for the four product categories
2. For each category, calculated the draft GWP Baseline by weighting the EPDs according to the number of facilities (or companies) who provided data
3. To create the GWP compliance limit, DGS added 20% to the baseline to account for uncertainty in LCA & provide a buffer



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Creation of GWP baseline

Considerations

- Weighting by number of facilities instead of production volume
- Blending number of facilities with number of producers



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Creation of GWP baseline

Considerations

- Comparing EPD results with different background datasets and different ages
- Sampling bias from published EPDs
- PCRs expire



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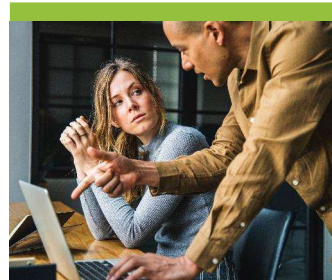
Creation of GWP baseline

thinkstep Recommendation



Industry-average EPDs should be used for creation of the baseline since they are production weighted and are created with consistent background data.

thinkstep Recommendation



Reference the 'most current version' of each PCR



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Product vs. Facility-specific EPDs

Considerations

- Back-calculating energy costs
- Traceability difficulties
- System boundary issues



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Product vs. Facility-specific EPDs

Recommendation

- CA should ask for product-specific EPDs but companies are welcome to create facility-specific EPDs



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Exclusion vs. Preference

Considerations

- Using the average of EPDs rather than the min / max of participants
- Feasibility to actually construct buildings in California
- No incentive to change behavior to reduce emissions
- Similar laws in WA and OR



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Exclusion vs. Preference

Recommendation

- Give preference to products with reduced GWP, but don't exclude anyone from the market



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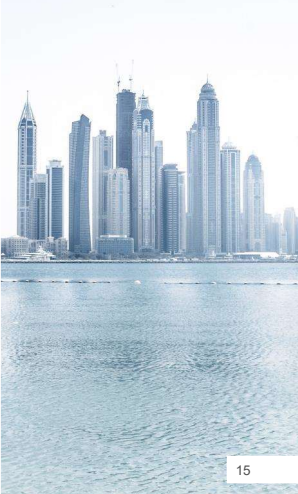
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Excluding Insulation & Glass

Considerations

- GWP payback of insulation and windows
- Measuring environmental performance


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Excluding Insulation & Glass

Recommendation

- Don't exclude insulation or windows for their A1-A3 impacts, use some other criteria like insulating properties. Or don't exclude at all



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Time to Act

- Aug 10th 2018 – public comment ended. Thinkstep and NGA made recommendations that were aligned.
- Jan 1st 2019 – DGS will be requesting EPDs
- Jan 1st 2010 – DGS will be requiring EPDs

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Discussion



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