

**Business Council for Sustainable Energy (BCSE) Comments in Response  
to the General Services Administration’s Federal Buy Clean Request for Information:  
Construction Materials with Substantially Lower Embodied Carbon**

November 3, 2022

The Business Council for Sustainable Energy (BCSE) appreciates the opportunity to respond to the Federal Buy Clean Request for Information (RFI) related to Construction Materials with Substantially Lower Embodied Carbon.

The RFI supports the implementation of the Biden Administration’s Federal Sustainability Plan and Executive Order 14057 that include new actions under its Buy Clean Initiative to promote use of low-carbon construction materials.

BCSE hopes to serve as a resource to help inform General Services Administration’s (GSA) Buy Clean related activities, including the \$2.15B appropriated to GSA in the Inflation Reduction Act (IRA) of 2022, P.L. 117-169, 136 Stat. 1818 for “Use of Low-Carbon Materials.”

BCSE commends Congress and the Biden Administration for enactment of landmark Infrastructure Investment and Jobs Act (IIJA) and the IRA. Together, these laws provide historic investment in the clean energy transition. The funding provided by the IRA in particular, can have a significant impact in helping to achieve the objectives of the Federal Sustainability Plan.

In this submission, BCSE provides general views to support GSA’s objectives and actions. For detailed responses on the proposal, BCSE would like to acknowledge the submissions made by the North American Insulation Manufacturers Association (NAIMA) and the U.S. Green Building Council. BCSE encourages the thoughtful consideration of the issues and recommendations included in these submissions.

### **About the BCSE**

The BCSE, founded in 1992, is a clean energy trade association, spanning a broad spectrum of industry sectors, including energy efficiency, energy storage, natural gas, renewable energy, sustainable transportation and emerging decarbonization technologies. BCSE also has an independent small- and medium-size businesses initiative under its banner, the Clean Energy Business Network (CEBN). Together, the BCSE and CEBN represent the full range of the clean energy economy, from Fortune 100 companies to small businesses working in all 50 states supporting over 3 million U.S. jobs. As a diverse set of members, please note that not all members take a position or endorse the recommendations in this submission.

## **General Views on the GSA RFI on Lower Embodied Carbon Materials**

Related to the GSA's actions in support of Buy Clean, BCSE offers the following perspectives. Of note, as a diverse coalition, not all members take a position or endorse the recommendations included in this submission.

### ***GSA Action to Support Reduction in Operational Carbon and Embodied Carbon***

BCSE appreciates the focus of the RFI questions related to lowering the embodied carbon in several key sectors that contribute to 98 percent of federal government expenditures on materials for construction and buildings projects – asphalt, concrete, steel and glass. With this focus, GSA seeks to understand the current availability of materials that may have a lower level of embodied carbon as compared to similar materials and we encourage GSA to take an expansive view of materials in applying this funding. BCSE also notes that the Federal Sustainability Plan and Executive Order 14057 will rely on the significant and continuous reduction of operational carbon for the objectives of these policies to be met and we see a potential for this funding to facilitate reduction of operational carbon through pairing with performance contracting. BCSE looks forward to working with GSA on its operational carbon reduction initiatives as well as its embodied carbon actions and programs.

### ***Federal Buy Clean Resources Should Establish Metrics and Platforms for Project Comparability***

While Environmental Product Declarations (EPDs) are the primary tool to enable the comparability between products and materials based on their embodied carbon and full lifecycle environmental impacts, many companies and market actors remain unfamiliar with EPDs and/or lack the resources to develop accurate and verified EPDs for their products. GSA, working in collaboration with other agencies, including the Environmental Protection Agency, could play a role by aggregating useful resources and providing guidance on EPD development and potentially alternative tools for particular categories to increase availability and use. This is needed both within a particular product category and between product categories.

### ***GSA Buy Clean Actions Should Support Market Innovation and New Low Embodied Carbon Products***

GSA's Buy Clean actions and programs have the opportunity to lower the embodied carbon in federal projects and also support the adoption of new and innovative products in the market. Federal resources should both support market adoption of low carbon materials available today, but also provide incentives for new and innovative materials to be utilized as they become available. Flexibility is essential to ensure federal actions enable projects to go forward today to improve the sustainability of federal facilities and projects, while also sending market signals for investment in lower embodied carbon materials over time.

Thank you for the opportunity to share the Council's views on this RFI. Should you wish to discuss these comments further, please contact BCSE President Lisa Jacobson via email at [ljacobson@bcse.org](mailto:ljacobson@bcse.org).