



**To the Division of the State Architect and California Building Standards
Commission Green Advisory Committee**

**Re: Proposed Changes to the 2022 California Green Building Standards Code,
California Code of Regulations, Title 24, Part 11**

WAP Sustainability is a global leader in Life Cycle Assessment, Environmental Product Declaration, Climate Risk, ESG Reporting, and Supply Chain Transparency; developer of the NAPA Emerald Eco Tool for Asphalt and the Athena Institute EPD Tool for Concrete; and the largest producer of EPDs for the built environment in North America. WAP has worked with public companies, private companies, and jurisdictions of all sizes around the world with their sustainable procurement preparations, disclosures, and optimization strategies. WAP has decades of combined experience in the tracking, marketing, communicating, and improvement of sustainability metrics for organizations including many of those that supply products for use in federal government projects. We have helped over a thousand organizations understand their environmental impacts and develop strategies to reduce their footprint. We also have experts on staff that have directly helped in the development and deployment of whole building and product level life cycle assessment tools; environmental product declaration and global warming potential (GWP) requirements within LEED certifications; International Green Construction Code; ASHRAE 189.1; NAHB National Green Building Standard Green Globes Certification; Cradle to Cradle, Living Building Challenge, NSF 140, NSF 332, BIFMA Level and other multi-attribute certification programs to name a few.

WAP has a long history of expertise in life cycle assessment and environmental product declaration work, and we greatly appreciate the opportunity to comment on the numerous questions set forth by the Environmental Protection Agency (EPA). We would also like to take this opportunity to applaud the State Green Advisory Committee on their interest in including product environmental impact into the code. The massive growth in interest in the environmental impacts of products in the last couple of years has led to more chances for potential misunderstandings of this new information in the marketplace, so comment periods and discussion are necessary to ensure application of this concept is done correctly. We also thank you for changes made based on our initial comments.

We do still have one question that was never answered from our first comments nor during the discussion with the committee during its public hearing:



1. **Question on Table 5.409.3 Product GWP Limits** – We still do not understand the inclusion of a global warming potential maximum limit for mineral wool board insulation. The other products certainly make sense and are currently covered by the California Buy Clean Act, with the addition of concrete. We also understand that mineral wool board insulation is covered in the California Buy Clean Act, but many in the marketplace were confused by the inclusion of only this type of insulation in the initial Buy Clean Act and including it here continues that confusion. While insulation of all types can have embodied carbon impacts (this is to say global warming potential impacts on) our environment, looking at only that in these cases can be confusing as insulation's primary purpose is saving operational energy. So while CALGreen and the rest of California State Codes address operational energy in many areas, we don't understand why a single type of insulation is being singled out when all insulation should be looked at in a total carbon basis.

Thank you again for the opportunity to comment and we look forward to the discussion.

Sincerely,

A handwritten signature in black ink, appearing to read 'Josh Jacobs', is written over a light gray dotted line.

Josh Jacobs
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