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Buy Clean California AB262 and 1817

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Winners and Losers

Acronyms

DGS – Department of General Services

GWP – Global Warming Potential

EPD – Environmental Product Declaration

PCR – Product Category Rules



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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



Carbon Steel Rebar

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



Flat Glass

Clear or tinted float and rolled glass without additional processing

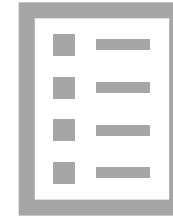


Mineral Wool Insulation

Low and high density mineral wool board from rock and slag

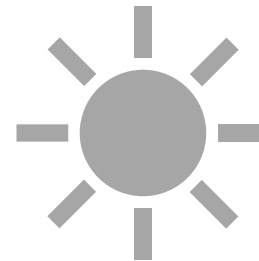


1. Collected existing EPDs for the four product categories
2. For each category, calculated the draft GWP Baseline by weighting the EPDs according to the number of facilities (or companies) who provided data
3. To create the GWP compliance limit, DGS added 20% to the baseline to account for uncertainty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



Considerations

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



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

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Reference the 'most current version' of each PCR

Product vs. Facility-specific EPDs



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Considerations

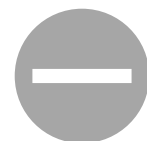
■ Back-calculating energy costs



■ Traceability difficulties



■ System boundary issues



Product vs. Facility-specific EPDs



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Recommendation

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





Considerations

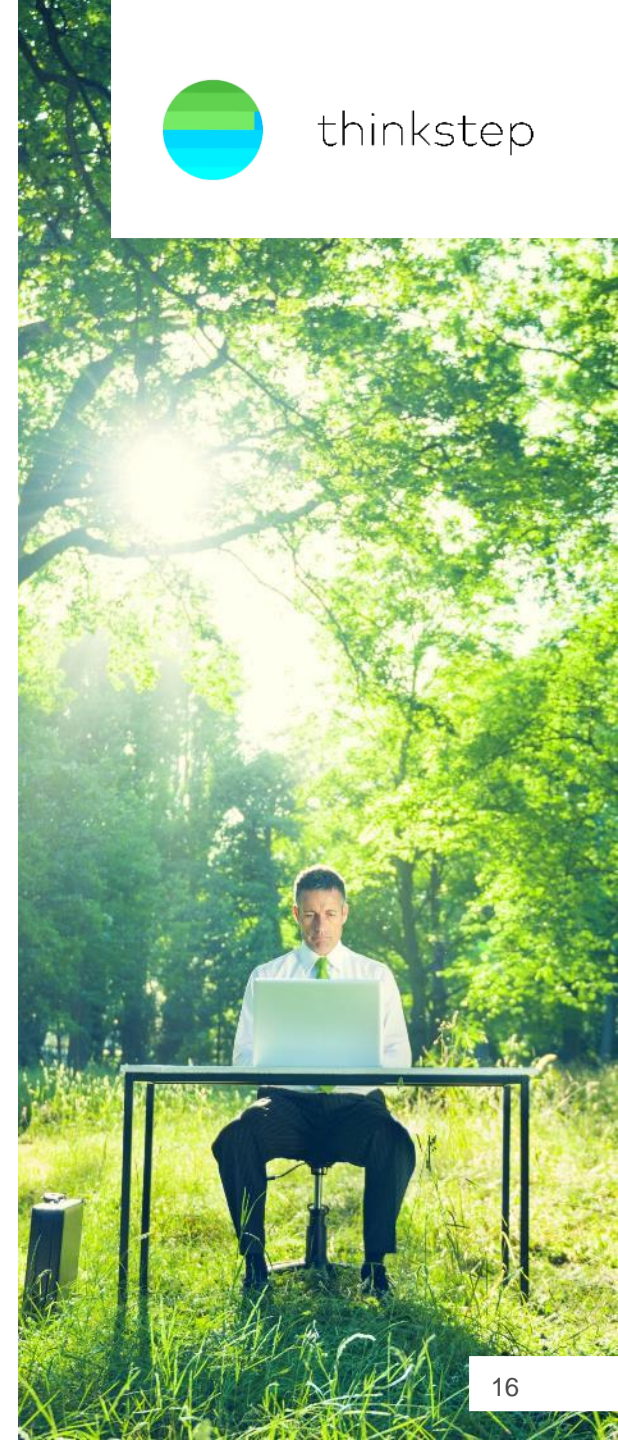
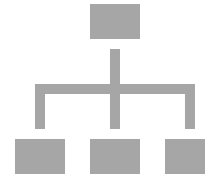
- Using the average of EPDs rather than the min / max of participants
- Feasibility to actually construct buildings in California
- No incentive to change behavior to reduce emissions
- Similar laws in WA and OR





Recommendation

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





Considerations

- GWP payback of insulation and windows
- Measuring environmental performance





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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Discussion

Time to Act



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- Aug 10th 2018 – public comment ends
- Jan 1st 2019 – EPDs requested
- Jan 1st 2010 – EPDs required