



GSA Public Buildings Service

17 MARCH 2022

MEMORANDUM FOR: PUBLIC BUILDINGS SERVICE
REGIONAL COMMISSIONERS
ASSISTANT COMMISSIONERS
DESIGN AND CONSTRUCTION DIRECTORS
FACILITIES MANAGEMENT PROGRAM DIRECTORS
ACQUISITION DIRECTORS

FROM: CHARLES HARDY, AIA, CCM
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PUBLIC BUILDINGS SERVICE

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SUBJECT: ISSUANCE OF LOW EMBODIED CARBON CONCRETE AND
ENVIRONMENTALLY PREFERABLE ASPHALT STANDARDS

As of March 17, 2022, GSA implements new national standards for low embodied carbon concrete and environmentally preferable asphalt. These standards apply to design and construction contract awards for all GSA projects, both capital and small, regardless of funding source: paving upgrades, modernizations, new construction, customer-funded projects through BA80 Reimbursable Work Authorizations, privately-financed projects such as Energy Savings Performance Contracts, and all *Bipartisan Infrastructure Law* projects. The Center for Engineering will provide training on these new standards on [April 20](#) and [May 18, 2022](#). The standards are also being added to national statement of work templates.

GSA's new low embodied carbon concrete standard requires construction contractors to provide environmental product declarations (EPDs). An EPD is a standard, third-party-verified summary that lists the primary environmental impacts associated with a product's extraction, transportation, and manufacture. The standard also asks contractors to provide concrete that meets numeric limits for the amount of greenhouse gas emissions, or "embodied carbon," associated with its production; EPDs contain these numbers. GSA's limits reflect a 20% reduction from the limits for concrete in model code language.

For environmentally preferable asphalt, the standard requires at least two environmentally preferable techniques to be used during the material's manufacture or installation. The standard provides a menu of techniques and practices that asphalt manufacturers and experts have identified as being widely-available ways to improve environmental impacts.

These standards apply to projects that use at least ten cubic yards of concrete or asphalt. A P100 waiver may be requested where project-specific circumstances make compliance infeasible.

GSA developed these new standards through collaboration with other Federal agencies including DOT, EPA, DoD, and DOE, and with a wide variety of trade associations, nonprofits, and local government agencies. Requests for information were also posted on SAM.gov to gain marketplace insights from industry. Over 130 respondents provided valuable input for consideration and incorporation.

These new concrete and asphalt standards align with Executive Order 14057, *Catalyzing Clean Energy Industries and Jobs Through Federal Sustainability*, which directs the Federal Government to use its scale and procurement power to “promote use of construction materials with lower embodied emissions[.]” They also advance the 2021 P100 goal that “careful consideration must be given to the use of high embodied carbon items like concrete[.]”

The Office of Design and Construction is excited to deploy these groundbreaking national standards, which are the first in the U.S. to apply beyond a local jurisdiction. We appreciate the support of project teams as GSA promotes “Buy Clean” actions across our real property portfolio, and helps grow the market for more sustainable products and services, including from U.S. small businesses. These innovative standards may evolve as GSA and its suppliers build implementation experience.

If you have any questions on this action, please contact me at charles.hardy@gsa.gov. For technical inquiries, contact GSA embodied carbon lead Walter Tersch at walter.tersch@gsa.gov.