GSA Green Building Advisory Committee (GBAC) policy recommendations:
1) All projects (small & large) should apply a material approach, and require environmental product declarations (EPDs) for 75% of products; and
2) Large projects should use a whole building life cycle assessment approach to target a 20% carbon reduction, compared to a project-specific baseline building.

New P100 Decarbonization section: “careful consideration must be given to the use of high embodied carbon items like concrete and steel. See the Carbon Smart Materials Palette.” (§ 1.9.2.9)

Embodied Carbon Roundtable gathered ideas and insights from more than 50 experts.

GSA’s new Embodied Carbon Task Force selected three priority actions:
1) Smaller projects will use EPDs for a material approach;
2) Larger projects will implement whole building life cycle assessment early; and
3) Asset planning must factor in embodied carbon.

Executive Order 14057: “promote use of construction materials with lower embodied emissions”.

Sustainable Acquisition Initiative promotes sustainability (including embodied carbon reduction) in high-dollar, high-risk, or high-opportunity contracts.

Issued standards for low embodied carbon concrete and environmentally preferable asphalt.

Issued requests for information from the concrete and asphalt manufacturing industries.

CEQ started hosting weekly interagency Buy Clean Technical Advisory Group meetings.

First projects awarded with new standards. Pilots continue on whole building embodied carbon reduction measure.
Low Embodied Carbon Concrete Standards for all GSA Projects

1) The [prime contractor] shall provide a product-specific cradle-to-gate Type III environmental product declaration (EPD) for each concrete mix design specified in the contract and used at the project, using NSF International’s product category rule for concrete. Please send EPD(s) with each concrete mix batch design (including type [e.g. standard or lightweight mix] and volume) to embodiedcarbon@gsa.gov, and upload the submittals into GSA’s project management information system.

2) The [prime contractor] shall provide low embodied carbon concrete that meets the global warming potential (GWP) limits of the table below, for concrete of the mix type and strength class.

<table>
<thead>
<tr>
<th>Specified compressive strength (f’c in PSI)</th>
<th>Standard Mix</th>
<th>High Early Strength</th>
<th>Lightweight</th>
</tr>
</thead>
<tbody>
<tr>
<td>up to 2499</td>
<td>242</td>
<td>326</td>
<td>462</td>
</tr>
<tr>
<td>2500-3499</td>
<td>306</td>
<td>413</td>
<td>462</td>
</tr>
<tr>
<td>3500-4499</td>
<td>346</td>
<td>466</td>
<td>501</td>
</tr>
<tr>
<td>4500-5499</td>
<td>385</td>
<td>519</td>
<td>540</td>
</tr>
<tr>
<td>5500-6499</td>
<td>404</td>
<td>546</td>
<td>N/A</td>
</tr>
<tr>
<td>6500 and up</td>
<td>414</td>
<td>544</td>
<td>N/A</td>
</tr>
</tbody>
</table>

These numbers reflect a 20% reduction from GWP (CO₂e) limits in proposed code language: "Lifecycle GHG Impacts in Building Codes" by the New Buildings Institute, January 2022.
Low Embodied Carbon Concrete Standards for all GSA Projects

3) These requirements apply to all GSA projects that use at least ten (10) cubic yards of concrete.

4) If it is not feasible to meet GSA’s EPD requirement or GWP limits, the [prime contractor] shall ask the GSA project manager to request a P100 waiver.
   a) The [prime contractor] shall outline and provide evidence of the specific circumstances that make compliance infeasible. For example, the only concrete suppliers within the maximum transport range for the mix design:
      i. are small businesses that have not yet invested in EPDs; or
      ii. do not yet offer mixes that meet GSA’s GWP limits, e.g. because lower-carbon materials are unavailable, or do not meet specific client-driven performance requirements.
   b) Any requests for waivers from the GWP limits must include the strategies, if any, that will be used to reduce GWP to the extent feasible. Such strategies include, but are not limited to, the use of alternative cements, supplementary cementitious materials, or alternative aggregates.
   c) For each concrete mix for which GSA has granted a waiver from the EPD requirement, the [prime contractor] shall send a GWP estimate generated with a tool such as ZGF’s LCA Tool, Athena IE or the Federal Highway Administration’s LCA Pave Tool to embodiedcarbon@gsa.gov.
   d) GSA will respond to each complete P100 waiver request with a decision or a request for more detail within ten (10) business days. A complete waiver request is deemed granted if no response is provided within that time.
1) The [prime contractor] shall provide a product-specific cradle-to-gate Type III environmental product declaration (EPD) for each asphalt mix specified in the design and used at the project, using version 2 of the National Asphalt Paving Association’s product category rule for asphalt mixtures. Please send EPD(s) to embodiedcarbon@gsa.gov, and upload EPD(s) into GSA’s project management information system.

2) The [prime contractor] shall provide **environmentally preferable asphalt**, which is defined in this context as material manufactured or installed using at least two (2) of the following techniques. Please send each asphalt mix batch design (including type, volume, and a description of the proposed techniques) to embodiedcarbon@gsa.gov, and upload the submittals into GSA’s project management information system.

   a) Greater than 20% reclaimed asphalt pavement (RAP) content (specify percentage, and whether in-place or central plant recycling is used);
   b) Warm mix technology (reduced onsite mix temperature);
   c) Non-pavement recycled content (e.g. roof shingles, rubber, or plastic);
   d) Bio-based or other alternative binders;
   e) Improved energy/ carbon efficiency of manufacturing plants or equipment (e.g. using natural gas or electric for heating materials); or
   f) Other environmentally preferable features or techniques (please specify).
Environmentally Preferable Asphalt Standards for all GSA Projects

3) These requirements apply to all GSA projects that use at least ten (10) cubic yards of asphalt.

4) If it is not feasible to meet GSA’s EPD requirement or to implement at least two of the listed environmentally preferable features or techniques, the [prime contractor] shall ask the GSA project manager to request a P100 waiver.

   a) The [prime contractor] shall outline and provide evidence of the specific circumstances that make compliance infeasible. For example, the only asphalt suppliers within the maximum transport range for the mix design:

      i. are small businesses that have not yet invested in EPDs; or

      ii. do not yet offer mixes that use at least two environmentally preferable features or techniques while meeting specific client-driven performance requirements.

   b) For each asphalt mix for which GSA has granted a waiver from the EPD requirement, the [prime contractor] shall send a GWP estimate generated with a tool such as Athena Pavement LCA or the Federal Highway Administration’s LCA Pave Tool to embodiedcarbon@gsa.gov.

   c) GSA will respond to each complete P100 waiver request with a decision or a request for more detail within ten (10) business days. A complete waiver request is deemed granted if no response is provided within that time.
GSA new construction and major modernization designs must target a 20% reduction in their buildings' embodied carbon, compared to a project-specific standard baseline designs, as determined by the architect. Active FY22 measure.

- Compare embodied carbon footprints for at least the structure and enclosure of a comparable standard baseline design, and the proposed facility, using a GSA-approved estimation tool.

- Earn the LEED Building Life-Cycle Impact Reduction credit using the Whole-Building Life-Cycle Assessment option.

Embodied carbon estimation tools include:

(a) Tally (from Building Transparency)
(b) EC3 (Embodied Carbon in Construction Calculator)
(c) One Click LCA
(d) Athena’s Impact Estimator for Buildings
(e) AutoDesk’s Insight 360