



June 2, 2022

The Honorable Steve Bennett
Member of the Assembly
State Capitol
Sacramento, CA 95814

RE: AB 1369 (Bennett) – Oppose Unless Amended
Set for hearing, June 14, 2022 – Senate Committee on Governmental Organization

Dear Assembly Member Bennett:

The undersigned organizations, representing a cross-section of the insulation manufacturing industry have regretfully taken an **“Oppose Unless Amended”** position on your AB 1369, legislation amending the state’s Buy Clean California Act.

Collectively, our industries have a long history of supporting increased energy efficiency requirements for commercial and residential buildings. We also support efforts relative to carbon mitigation and we support incentives that result in the conservation of energy resources and reduced greenhouse gas emissions (GHGs). We certainly appreciate the intent of AB 1369, but we are concerned that a single focused look at “embodied carbon” relative to insulation does not account for the “operational carbon” savings that result from the use of these products.

The building and construction sector accounts for 37 percent of global carbon emissions. Embodied carbon accounts for 10 percent while building operations account for 27 percent of emissions of those emissions.¹ Building materials like concrete, steel, and glass account for the largest portion of the embodied carbon. Cement alone, which is interestingly not included in the materials list in AB 1369 accounts for 7 percent of overall global greenhouse gas emissions.² Materials like steel and glass are the next highest contributors, which means insulation makes up an extremely small portion of a building’s embodied carbon.

Despite its relatively small percentage in overall building embodied carbon impact, insulation does however have a significant contribution to operational energy and GHG savings. The role of increased energy efficiency in meeting climate change goals and reducing GHGs is well documented.³

Due the significant savings attributed to insulation products and only a minor contribution to a building’s embodied carbon profile, we respectfully request that insulation materials, including mineral wool board insulation be excluded from the eligible materials list. A focus that exclusively looks only at

¹[GABC Buildings-GSR-2021 BOOK.pdf \(globalabc.org\)](#)

²[Embodied carbon of concrete in buildings, Part 1: analysis of published EPD \(journal-buildingscities.org\)](#)

³ https://www.energystar.gov/about/about_energy_efficiency

embodied carbon could lead to improper product selection, limit the availability of certain insulation materials for use in state projects, and negatively impact the operational carbon use of the building.

Insulation materials provide important benefits beyond thermal protection including air sealing, vapor management, moisture performance, structural performance and durability, which are beneficial to a building's overall performance.

Insulation manufacturers have been optimizing their products to lower their carbon footprints for many decades. Manufacturers have also been developing Environmental Product Declarations (EPDs) for insulation products that allow for greater transparency and to help architects make informed decisions that combine environmental information and project needs.

Our industries support a whole building approach to reducing carbon emissions associated with building construction. Policies should establish requirements that incentivize product transparency and establish carbon reduction goals that use whole building metrics for both embodied and operational carbon. In our view, legislation like AB 1369 should recognize product contributions to operational carbon savings and consider how insulation products can save more carbon and energy than it takes to produce them.⁴ We look forward to working with you to meet the objectives of your legislation, while also ensuring that the opportunity to capitalize on both environmental (embodied carbon) and performance (operational carbon savings) is not overlooked.

Thank you in advance for your consideration of our views. Should you have any questions, please contact Tim Shestek with the American Chemistry Council at 916-448-2581 or tim_shestek@americanchemistry.com.

Sincerely,



Tim Shestek
American Chemistry Council

On behalf of the following individuals and organizations:

Walter Reiter - EPS Industry Alliance
Justin Koscher - Polyisocyanurate Insulation Manufacturers Association
Richard S. Duncan, PhD, PE - Spray Polyurethane Foam Alliance
Michael Fischer - Extruded Polystyrene Foam Association
Curt Rich – North American Insulation Manufacturers Association
Michael Kwart - Insulation Contractors Association of America
Michele M. Jones – National Insulation Association
Jack Armstrong - Structural Insulated Panel Association

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cc: Members, Senate Committee on Governmental Organization

⁴[Life Cycle Greenhouse Gas Emissions Reduction from Rigid Thermal Insulation Use in Buildings by Michael H. Mazor, John D. Mutton, David Russell, Gregory A. Keoleian :: SSRN](#)