

13 March 2023

Sustainability and Pollution Prevention Branch
 Data Gathering and Analysis Division
 Office of Pollution Prevention and Toxics
 Office of Chemical Safety and Pollution Prevention
 U.S. Environmental Protection Agency
 1200 Pennsylvania Avenue
 Washington, DC 20460

Re: Public comment on “Request for Information (RFI) to Support New Inflation Reduction Act Programs to Lower Embodied Greenhouse Gas Emissions Associated with Construction Materials and Products,” EPA-HQ-OPPT-2022-0924

Dear EPA,

The TIC Council Americas is pleased to provide comment on the EPA’s Request for Information (RFI) to Support New Inflation Reduction Act Programs to Lower Embodied Greenhouse Gas Emissions Associated with Construction Materials and Products, EPA-HQ-OPPT-2022-0924. Independent third-party TIC organizations play a critical role in confirming the greenhouse emissions of products and related claims by manufacturers and we and our members look forward to collaborating with the EPA and industry on this topic.

The independent third-party testing, inspection, and certification (“TIC”) industry, worth \$240 billion globally, evaluate products, systems, and services to U.S. regulatory and industry requirements and support efforts to confirm that claims by industry can be verified and are substantiated by traceable data. The TIC industry facilitates trade by confirming compliance across borders and building trust.

As an example of the depth of services offered by the TIC industry, TIC organizations offer many GHG emission related services, such as:

- Calculation of GHG emissions
- Certification of GHG emission reduction
- Measurement of fugitive emissions
- Assistance to reach zero-net emission

Companies entrust the TIC sector to support them in their transition towards more sustainable products including efforts to reduce greenhouse gas emissions. This is due to the TIC industry’s ability to offer economies of scale, access to STEM-educated personnel, and availability globally throughout the supply chain.

To support the work of the EPA, we offer the following recommendations related to lowering embodied greenhouse gas emissions associated with construction materials and products:

Question	Response
B. What data accessibility and improvement approaches should EPA consider?	
B7 Life Cycle Stages	The boundary of the emissions (i.e. cradle to gate, or cradle to grave) in concern should be prescribed to ensure the

	consistent quantification and communication work.
B8 Improving Background Datasets	Third-party evaluation and assurance of background datasets that comprise a database should be required to guarantee the quality of background data.
C. What PCR and EPD standardization, measurement, verification, and reporting approaches for use in procurement decision-making should EPA consider?	
C12 Standardizing and Verifying Product Category Rules	The Product Category Rules should demonstrate their adherence to international standards such as ISO 14040 and 14044 through third-party verification.
C14 Verifying EPDs	To demonstrate the credibility of verifiers (e.g., Conformity Assessment Bodies (CABs)), ISO/IEC 17029 should be the standard used by the accreditation body to assess verifiers/CABs.

TIC Council is a global association representing over 90 international independent third-party testing, inspection, certification and verification organizations. Testing, Inspection and Certification (TIC) companies cater to a diverse range of industry sectors and a variety of standards and legislation.

We appreciate the opportunity to provide comment on the EPA’s Request for Information (RFI) to Support New Inflation Reduction Act Programs to Lower Embodied Greenhouse Gas Emissions Associated with Construction Materials and Products, EPA-HQ-OPPT-2022-0924. Should you have any questions, please don’t hesitate to contact Karin Athanas at +1 240 762 8069 / kathanas@tic-council.org.

Sincerely,



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 Director General
 TIC Council



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