January 5, 2024

U.S. Environmental Protection Agency
Office of Chemical Safety and Pollution Prevention
Office of Pollution Prevention and Toxics

Re: Support of the steel industry's grant application to the EPA's Reducing Embodied Greenhouse Gas Emissions for Construction Materials and Products
Funding Opportunity #EPA-R-OCSPP-OPPT-FY2023-001

To Whom it May Concern,

As a coalition of labor unions and environmental organizations collectively representing millions of members and supporters, the BlueGreen Alliance writes to express our support of the collaborative application between the American Institute of Steel Construction (AISC), the American Iron and Steel Institute (AISI), and University of Massachusetts Amherst for the *Reducing Embodied Greenhouse Gas Emissions for Construction Materials and Products* grant program. This program is of critical importance to the public and private sectors as both increasingly rely on high-quality data to inform procurement decisions. With more granular level information of the embodied emissions associated with such products, materials with the lowest embodied emissions may be identified and purchased. Emissions transparency is the foundation of the federal Buy Clean initiative, which ensures that public infrastructure—from bridges to buildings—supports clean manufacturing.

Their grant application proposes a comprehensive project to boost the Environmental Product Declaration (EPD) landscape of the domestic steel construction products industry. This project is critically important. Although the steel industry has already made significant investments in EPD development—95% of domestic structural steel products are associated with a facility-specific EPD—the process is still burdened by high costs, long lead times, older data, and lack of comparability. The primary project objective is a Steel EPD Generator Tool that will allow the whole industry—from producers to downstream manufacturers—to capture their impacts and publish EPDs in a far more robust and consistent manner. EPDs created with this tool will be more accurate, representative, interoperable, and harmonized.

Full funding of their application will significantly advance the shared goals of the steel industry and the Biden administration's Federal Sustainability Plan to

not only support strong infrastructure, but also good manufacturing jobs, clean air, and a livable climate.

Thank you,

Jason Walsh
Executive Director
BlueGreen Alliance