

Miles Sand & Gravel Company

We support enacting a progressive policy shift by endorsing the generation of carbon offset credits for concrete with a Global Warming Potential (GWP) below the NRMCA (National Ready Mixed Concrete Association) regional benchmark. This forward-looking measure is designed to incentivize the production and utilization of low-carbon concrete, aligning with broader initiatives to curtail the construction industry's carbon footprint. Carbon offset credits, functioning as a market-driven mechanism, furnish businesses with financial incentives to embrace cleaner technologies and practices, thereby facilitating a seamless transition toward sustainability. The focus on a GWP below the NRMCA regional benchmark not only encourages emissions reduction but also acknowledges and rewards companies surpassing established environmental targets.

The integration of concrete into the carbon offset credit program reflects a nuanced understanding of the material's substantial emissions and recognizes its potential for improvement. Concrete production, recognized for its energy-intensive nature, has long been a focal point in discussions about mitigating industrial carbon footprints. This proposal not only supports businesses in adopting environmentally responsible practices within the construction sector but also aligns with a pro-business perspective by acknowledging the economic benefits derived from incentivizing innovation and sustainability in concrete production.

Moreover, the incorporation of Tier 3 Environmental Product Declarations (EPDs) underscores a commitment to transparency and environmental responsibility. Tier 3 EPDs offer a comprehensive account of the environmental impacts of a product, providing businesses and consumers with essential information for informed decision-making. This strategic move not only supports the use of low-carbon concrete but also ensures that businesses can make decisions based on accurate and robust environmental data. As an example of how carbon offset would be measured, the system could quantify emissions reductions through a standardized approach, such as measuring the difference in emissions between conventional concrete and low-GWP concrete, reinforcing the efficacy of the program. Overall, allowing carbon offset credit generation for low-GWP concrete in Washington State's cap-and-trade system, alongside reference to the NRMCA regional benchmark and Tier 3 EPDs, represents a comprehensive and business-friendly strategy to promote sustainability in the construction industry.