

Buy Clean and Buy Fair, Purpose of the Plan:

Washington's 2026 Low-Carbon Manufacturing Plan outlines how the state will expand low-carbon materials manufacturing, reduce embodied carbon in public construction, and strengthen the industrial workforce. Concrete, cement, and aggregates are central to the policy's scope.

Where the Plan *Supports* the Industry

1. Strong Policy Support for Lower-Carbon Cement

- Encourages Type II (1-L) cement adoption across public projects.
- Promotes performance-based specifications, reducing prescriptive barriers to SCM use.
- Aligns with national trends, reducing competitive disadvantage for early adopters.

2. Funding for EPDs and Compliance

- Recommends state grants to help small and mid-sized producers create EPDs.
- Acknowledges the financial burden of LCA tools and proposes state support.

3. Streamlined Permitting for Low-Carbon Technologies

- Calls for accelerated permitting for clean materials facilities and SCM technologies.
- Supports programmatic environmental reviews to reduce delays.

4. Workforce Development Investments

- Expands CTE programs for materials production and installation.
- Funds apprenticeships and training aligned with low-carbon concrete technologies.
- Supports childcare and transportation to improve labor retention.

5. Recognition of Concrete in Whole Building LCA

- Encourages whole building carbon standards that account for:
 - Mix optimization
 - Carbonation uptake
 - Transportation impacts
- Creates a more level playing field with mass timber.

Where the Plan *Creates Challenges*

1. Increased Reporting Requirements

- Requires supply-chain-specific EPDs, not industry averages.
- Expands reporting to workforce data and potentially deeper supply-chain transparency.
- Adds administrative burden, especially for smaller ready-mix producers.

2. Potential Future GWP Limits

- Recommends adding GWP thresholds for concrete and cement.
- Could disadvantage producers with limited SCM access or long haul distances.
- Creates compliance risk for rural or legacy plants.

3. Expansion to WSDOT Projects

- If adopted, BCBF would apply to all transportation infrastructure, dramatically increasing:
 - EPD volume
 - Mix design constraints
 - Compliance oversight
- Pavement and bridge mixes may face stricter GWP expectations.

4. Pressure for Rapid Technological Adoption

- Encourages carbon capture, novel binders, and new SCMs.
- Creates capital and operational pressure for producers not yet ready to transition.

5. Potential Scrutiny on Aggregate Extraction

- While not directly regulated, the plan's emphasis on supply-chain transparency may lead to:
 - More attention to quarry emissions
 - Land-use and permitting challenges
 - Pressure to document A1 extraction impacts