

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