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National Asphalt Pavement Association
Attn. AmlanMukherjee
6406 Ivy Lane, Suite 350
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Date
March 13, 2026

Your reference
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Our reference
25.070-L01-JMe-NAPA PCR Review Statement 20260316

Concerning
PCR Review Statement

Dear Amlan,

The PCR Review Committee was asked to review the "Product Category Rules (PCR) For Asphalt Mixtures Version 2.1", a midstream update, that includes revisions in response to the Environmental Protection Agency's review of the asphalt mixture Product Category Rule against the EPA – PCR Criteria as published within the Construction Materials Opportunities to Reduce Emissions (C-MORE) program.

The Review Committee has reviewed the proposed revisions after a public comment period had taken place. We are happy to see that the EPA review, public comments and our comments have been appropriately dealt with and have resulted in improvements to the PCR and will lead to improved EPDs. As a result, we can state that the PCR complies with the intent of the ISO 21930 requirements.

We would like to point out the following topics that were resolved or are under process of implementation that stand out:

- The PCR v2.1 refers to different types of EPDs, including types that are not covered within the scope of the PCR. We found that the inclusion did not add to the clarity of the PCR itself but can agree with the clarifications that have been added.
- As the v3 of the PCR update is underway, some of the comments from the review of v2 and one comment from the review of v2.1 still need to be addressed. From the review of v2.1 this includes "the disclosure of pre- and post- consumer recycled content" on the EPD which is currently not implemented.

We thank NAPA for the commitment shown and revisions made during this review process.

On behalf of the review committee which consisted of the chair,
Professor John Harvey, UC-Davis and Emily B. Lorenz,
Consulting Engineer,

A handwritten signature in black ink, appearing to read 'J. Meijer', with a long horizontal stroke extending to the right.

Joep Meijer, The Right Environment
Chair