

# Asphalt Mixtures PCR Committee – Midstream Update

August 4, 2025

*Communication of the Asphalt Mixtures PCR Committee*

To Whom It May Concern:

In December of 2024, the Environmental Protection Agency (EPA), provided the National Asphalt Pavement Association (NAPA) a review of the Product Category Rules (PCR) for Asphalt Mixtures compared to the [EPA – PCR Criteria](#) as published within the [Construction Materials Opportunities to Reduce Emissions \(C-MORE\) program](#). The review is part of this package. In response, NAPA, in its role as the program operator for the North American PCR for Asphalt Mixtures, convened the PCR Committee to discuss and address the review. This document provides a summary of the discussion and serves as an overview of the changes made to the PCR. NAPA welcomes discussion and comments from the stakeholder community during a 30-day period in accordance with ISO review requirements.

## Overall Assessment

The following table summarizes EPA's review of the asphalt mixture PCR.


### Criteria Conformance Summary

The following table includes sets of criteria letters and the total determination counts, for the respective PCR. They are broken out by *Baseline / Leadership* classification and whether they are determined a *Pass / Not Pass*, for each *Category*.

Category	Baseline Criteria					Leadership Criteria				
	Total Count	Pass		Not Pass		Total Count	Pass		Not Pass	
		Criteria ID	Count	Criteria ID	Count		Criteria ID	Count	Criteria ID	Count
§ 1.1	8	A, B, C, D, E, F, G, H	8	None	0	3	I, J, K	3	None	0
§ 1.2	4	A, B, C, D	4	None	0	3	F, G	2	E	1
§ 2.1	14	A, B, C, D, E, F, G, H, I, J, K, L, M, N	14	None	0	2	O	1	P	1
§ 2.2	1	A	1	None	0	0	None	0	None	0
§ 3.1	3	A, B, C	3	None	0	1	D	1	None	0
§ 3.2	7	A, B, C, D, E, F, G	7	None	0	4	H	1	I, J, K	3
§ 3.3	2	A, B	2	None	0	4	C	1	D, E, F	3

The overall assessment can be summarized as follows:

- Baseline Criteria: Passed all.
- Leadership Criteria: Passed all except 1.2E, 2.1P, 3.2I, 3.2J, 3.2K, 3.3D, 3.3E and 3.3F.
- EPA specifically requested clarification on comment 1.1E.

**Reading this document:** This document outlines EPA's comments for each criteria and discusses how they were addressed. All flagged and commented criteria have been addressed as outlined in this document. A red flag  marks the Leadership Criteria that the PCR did not pass; while the unmarked criteria are the ones that EPA provided comments even though the PCR passed the criteria. The comments provided were addressed anyways. The comments have been topically classified.

## Leadership Criteria Comments Addressed

Criteria 1.1H: The PCR could benefit from additional clarity by defining the prescribed scenarios explicitly stating that deviation is not allowed.

*Response:* The current PCR is prescriptive and allows no deviations, and it does not define any prescribed scenarios. The feedback will be used in version 3.

Criteria 1.1K: The tool used by the PCR produces an EPD with the specified information, but the PCR could benefit from having more explicit clarity.

*Response:* Adoption of openEPD and digital transfer protocol helps further clarify and provide exactness in format of information conveyed. Language added regarding the availability of the underlying model in the Federal LCA Commons, discussion in the reference LCA, and the Simulator for the tool that is available for licensed use. See additions to sections 10.1, 10.6 and 11.

## Updated Definitions

Criteria 1.1E: Please provide clarification regarding this statement found under Section 5.3 (Page 21) "This PCR is intended for facility-specific EPDs and industry average EPDs, but not product-specific EPDs as these terms are defined in Section 3.9."

*Response:* All definitions have been updated to align with the *ACLCA PCR Open Standard, Guidance for Determining EPD Types and Calculating and Communicating Data Specificity Through the Supply Chain*. Red-lined definitions have been provided in the attached PCR document. Updated definitions include old

numbering 3.9.17, 3.9.28 (new numbering 3.9.29) and 3.9.41 (new numbering 3.9.44). New definitions added for *Facility and product-specific EPD* (3.9.18), *Producer-average EPD* (3.9.42), *Product-average EPD* (3.9.43), and *Supply-chain specificity* (3.9.55).

Criterion 1.1F: EPDs must indicate data specificity (e.g. plant, industry avg).

*Response:* Due to the lack of specific data for upstream materials like asphalt binder (a significant contributor to global warming potential), the data specificity score will be reconsidered in version 3. The recent publication of the asphalt binder PCR and the promise of forthcoming asphalt binder EPDs will provide new information when this topic is revisited in version 3.

## Reviewer Qualifications

▶ Criteria 1.2E: Requirements in Appendix E not met (independent external experts). PCR committee chair is involved in pavement/asphalt industry.

*Response:* EPA has misunderstood the structure and role of the PCR Committee. While the NAPA PCR Committee is led by an industry stakeholder – as is expected and typical, the PCR was reviewed by an independent third-party panel including a pavement academic and two LCA practitioners. All three of the PCR reviewers, as well as the LCA reviewer and the reviewer of the Emerald Eco Label tool, meet the requirements in Appendix E. To avoid any future confusion, going forward NAPA will use the EPA-provided forms in their specified format, and keep them on record for future PCR Reviewers and EPD software verifiers. All current verification letters can be accessed on the [Emerald Eco-Label website](#).

## References To LCA

▶ Criteria 2.1P: Assumptions and limitations in the LCA were not listed in the PCR.

*Response:* This information is already included in detail in the underlying LCA. A reference to the existing LCA that covers all the information (Page 48 in LCA for Assumptions and Limitations) has been added to the PCR in section 5.2.2. and in the Foreword Section.

▶ Criteria 3.2I: Could not locate background data information in chart form.

*Response:* This information is already included in detail in the underlying LCA. A reference to the existing LCI Annex that covers all the information (Annex I, version

2, (2022) for the background data LCI specification) has been added to the PCR. See reference added to sections 7.1.7.2.2, 7.1.7.2.3 and 7.1.7.2.4.

## Upstream Materials

▶ **Comment 3.2J:** Could not find information on requiring facility-specific data for any upstream input that individually contributes 50% or more to the disclosed GWP-100.

*Response:* Only the asphalt binder comes close to contributing 50% or more (typically close to but less than 50%). The asphalt binder PCR has been recently published and NAPA expects to use binder EPDs as facility and product specific background data, as soon as those EPDs become available. A related decision was made to not report the supply chain specificity metric calculation as per ACLCA's Guideline because of the significantly high contribution of asphalt binder and natural gas, both of which are currently using generic LCI. This decision will be revisited after asphalt binder EPDs are available.

▶ **Comment 3.2K:** PCR does not address the use of upstream PCRs.

*Response:* At the time this version of the PCR was completed in 2022 there were few PCRs available for upstream materials. NAPA is taking this opportunity to directly include references to recently published and work-in-progress PCRs. Red lined and added in the attached PCR document. See updates to section 7.1.9.2.

▶ **Comment 3.3D:** This level of guidance on upstream facilities is not present in the PCR. No information pertaining to the carbon intensity of the manufacturing plant was found.

*Response:* Current PCR already allows optional inclusion of ENERGY STAR Energy Performance Indicator (see Section 8.3.2). Long term plans are to integrate ENERGY STAR with Emerald Eco-Label.

▶ **Comment 3.3E:** PCR does not require this separate disclosure of pre- and post-consumer recycled content.

*Response:* Current PCR already declares secondary material content in the mixture, typically including reclaimed asphalt pavement (RAP) and/or recycled asphalt shingles (RAS). Asphalt pavements are not consumer products, though the use of shingles could be considered post-consumer recycled content. As the asphalt shingles recyclers are currently in the process of conducting an industry-wide LCA,

this issue will be revisited and addressed with the advantage of their results in version 3 of this PCR.

## EAC Related Comments

Criteria 1.1J RECs are an appropriate replacement of EACs in the context of this criteria and GHG impact of RECs addressed including market-based calculation.

▶ Criteria 3.3F: This level of guidance for EACs is not provided in the PCR.

*Response:* At this time, EACs will be included only in additional environmental information, as is already possible in the current PCR (see Section 7.2.1.2 and Section 8.2.1) with plans to adopt quantitative accounting for RECs as per the ACLCA Guideline in version 3. REC reporting and documentation requirements as per EPA's criteria (Appendix D) are already described in Section 7.2.1.2. Further preparation for full adoption of EAC accounting in version 3 is underway.

## Additional Changes

The following additional changes were made to the PCR:

- Updates to the Foreword and addition of a change log.
- The PCR committee voted unanimously to include Mexico in the asphalt mixtures PCR, following the same path as Canada.