



theRightenvironment Ltd.

34434 Whiskey Jack Ln
Polson, MT 59860

Phone: 512 669 2305

www.therightenvironment.net

National Asphalt Pavement Association
Attn. Joseph Shacat
6406 Ivy Lane, Suite 350
Greenbelt, MD USA 20770-1441

Date
March 21, 2022

Your reference
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Our reference
20.050-L01-JMe-NAPA PCR Review Statement 20220124

Concerning
PCR Review Statement

Dear Joseph,

The PCR Review Committee has shared several rounds of discussion and feedback with NAPA. We would like to compliment the NAPA PCR Committee for its diligence and the progress that is reflected in this version of the PCR. We are happy to see that our discussions have been open and productive and have resulted in improvements to the PCR. As a result, we can state that the PCR complies with the intent of the ISO 21930 requirements.

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

- The PCR currently does not provide for a way to accommodate energy usage at the asphalt mixing plant that is more granular than a plant average over a 12-month period. This means that the energy that is modeled does not reflect the energy requirements of specific mix designs at specific mixing temperatures. This in turn means the plant energy data is potentially more advantageously declared for “hot mixes” and potentially disadvantages for “low temperature mixes”. NAPA has committed to working on an energy model that can be added to this PCR in the foreseeable future. We strongly recommend prioritizing the development of this energy model and make sure that relevant stakeholders are involved.
- The PCR Review Committee has reservations about the PCR rules for EPDs that are declared for mix designs where upstream data for some of the components are missing. We understand that not all data is available, but the PCR deviates in its approach on how to handle this from most other PCRs. Rather than filling data gaps for the upstream production of asphalt ingredients with proxy data which is considered best practice by most LCA practitioners, the PCR instead allows the EPD to be published even when some data is missing—up to 5% of the asphalt mixture mass—and as a way to be transparent about it, requires the EPD to show the appropriate

warnings/disclaimers for the users of the EPD. We understand that these data gaps will be closed in the future, some in the near future, and therefore have accepted the way the PCR proposes to deal with this. We want to encourage NAPA to continue the work of the data “Roadmap” and engage with relevant suppliers to close these gaps. The focus should be on, but not limited to, binder, blended binder, and additive data.

We thank NAPA for the commitment shown during this review process and look forward to the improvements listed above. It will increase the credibility and applicability of the NAPA EPD program. It will also allow the asphalt paving industry to show its progress working towards a more sustainable paving industry.

Sincerely yours,

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

J. Meijer
President