

# Public Review Draft

Proposed Addendum u to Standard 189.1-2023

# Standard for the Design of High-Performance Green Buildings Except Low-Rise Residential Buildings

First Public Review (July, 2025)  
(Draft Shows Proposed Changes to Current Standard)

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## Foreword

Section 9.4 is a mandatory component in Section 9 to address awareness of environmental impacts during product selection. This addendum simplifies the requirements for submitting Environmental Product Declarations (EPDs) and updates terminology. Compliance with the section can be achieved without identifying all building products within the building project or estimating the total cost of building products installed. The two tiers of requirements are based on the size of the building project or, for less than full new construction, on the area being altered. Regional- or industry-average EPDs do not count as a full product since the values do not directly represent the specific products being installed in the project. These changes to Section 9.4 simplify compliance with the standard and do not add cost.

*[Note to Reviewers: This addendum makes proposed changes to the current standard. These changes are indicated in the text by underlining (for additions) and ~~strikethrough~~ (for deletions) except where the reviewer instructions specifically describe some other means of showing the changes. Only these changes to the current standard are open for review and comment at this time. Additional material is provided for context only and is not open for comment except as it relates to the proposed changes.]*

## Addendum u to 189.1-2023

*Modify Section 9.4 as follows:*

### 9.4 Environmental Product Declarations and Global Warming Potential Reporting

**9.4.1 Environmental Product Declarations (EPDs).** EPDs shall be submitted for *building products* ~~that together represent not less than 25% of the total estimated costs of all building products permanently installed in~~ as part of the building project, ~~or not fewer than 30 EPDs,~~ and such that items (a) through (d) below are satisfied. EPDs submitted shall as follows:

- a. For building projects or building alteration areas greater than 10,000 ft<sup>2</sup> (1000 m<sup>2</sup>), submit not fewer than 30 EPDs
- a. ~~represent building products that are permanently installed at the time of issuance of the certificate of occupancy,~~
- b. representing building products from not fewer than ten different manufacturers,
- c. ~~represent not fewer than 20 different building products, and~~

~~d. include any building products with a value that exceeds 5% of the total cost of all building products permanently installed in the building project.~~

b. For building projects or building alteration areas greater than 5,000 ft<sup>2</sup> (500 m<sup>2</sup>) and less than or equal to 10,000 ft<sup>2</sup> (1000 m<sup>2</sup>), submit not fewer than 15 EPDs.

~~— A value of 45% of the estimated total construction cost shall be permitted to be used in lieu of the total cost of all building products permanently installed in the building project.~~

**9.4.2 Environmental Product Declaration Requirements.** EPDs used to comply with Section 9.4.1 shall be third-party verified ~~Type III~~ EPDs consistent with ISO 21930 or ISO 14025, with not less than a cradle-to-gate scope. ~~Where an industry-wide or product-specific Type III EPD is not available for a building product, a critically reviewed third-party life cycle assessment report based on ISO 14040 and 14044 or third-party verified summary thereof shall be permitted as an alternative method for demonstrating compliance.~~

~~Building product e~~Compliance shall be shown by submitting either a product-specific EPD or a regional- or industry-wide-average EPD. Each product-specific EPD shall be counted as one ~~building product~~-EPD. Each regional- or industry-wide-average EPD shall be counted as half of an ~~building product~~-EPD. Where an industry-average or product-specific EPD is not available for a building product, a critically reviewed third-party life cycle assessment report based on ISO 14040 and 14044 or third-party verified summary thereof shall be permitted as an alternative method for demonstrating compliance and shall be counted in the same manner as the corresponding type of EPD.

*Building products* delivered to the *building project* site as a *building product assembly* comprising multiple components and ready for installation into the *building project* shall be considered a single *building product*. Compliance with Section 9.4.1 shall be based on either

- a. an EPD representing the *building product assembly*, or
- b. the individual *building product* component parts' EPDs comprising not less than 80% of the *building product assembly's* total cost or weight.

**9.4.3 Reporting of Global Warming Potential (GWP) Contribution.** For each of the *building products* with EPDs used to comply with Section 9.4.1, the GWP reported in the applicable EPD as a declared unit or functional unit shall be multiplied by the number of declared units or functional units of the *building product* used in the *building project*. A report shall be created listing the results on a per *building product* basis, identifying the life cycle stages included in each GWP calculation, and including the total area of the building project or building alteration area, and shall be provided to the project owner and made available to the AHJ.