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September 30, 2025

Mr. Michael D. Hurley

Office of the Clerk of the Senate
24 Beacon St - Room 335
State House
Boston, MA 02133

Mr. Timothy Carroll

Office of the Clerk of the House
24 Beacon St - Room 145
State House
Boston, MA 02133

Dear Clerks of the Massachusetts Senate and House of Representatives:

The Embodied Carbon Intergovernmental Coordinating Council (Council), established pursuant to “An Act promoting a clean energy grid, advancing equity and protecting ratepayers,” St. 2024, c. 239 (“Act”), convened in March of 2025 and has been meeting on a monthly basis since then. Attached here is a list of the appointed members and their professional affiliations.

Section 4(c) of the Act requires the Council, by January 1, 2026, to prepare an embodied carbon reduction plan, including specific recommendations for submission to the Legislature. *See* Section 4(f). To that end, the Council has been reviewing “data, input and advice,” from experts and stakeholders, and held the first two of three required public hearings, *see* Section 4(d), on July 8, in Lexington; the second was held on September 29, in Amherst; and the final will be held in late October, location to be determined.

Section 115 of the Act requires the Council to submit an initial embodied carbon reduction plan by July 31, 2025, pursuant to M.G.L. c. 7C §73. As set forth below, the Council provides this interim report on the work completed to date and an initial summary of the embodied carbon

reduction plan currently under development. I note that Section 4(c) requires our consideration of availability and cost of materials. *See Section 4(c).*

- The Council meets on a monthly basis; co-chairs and their staff have organized several presentations from external experts and from within the Council on topics including Environmental Product Declarations (EPDs), Buy Clean laws across the country, procurement procedures within DCAMM, MassDOT, and OSD, building and stretch code creation, and recommendations from the concrete industry.
- In March, DCAMM published a webpage to publicize the formation of the Council. This webpage includes information on the Council, its membership and mission, and announcements; it also hosts publicly available documents and recordings. [Embodied Carbon Intergovernmental Coordinating Council \(ECICC\) | Mass.gov](#).
- Three subcommittees were formed that meet regularly: (1) Procurement, Procedure, Deconstruction & Reuse; (2) EPDs and GWPs; and (3) Technology, Market Incentives, and Building Codes.
- The Council has begun drafting the embodied carbon reduction plan and recommendations, with a goal of completing a first draft by late October. The Council is on track to submit these recommendations to the Clerks' offices before the end of the calendar year. The current outline includes the following:
 - Recommendations for requiring EPDs for eligible products and materials;
 - Suggestion for initial GWP limits and a process for reviewing and modifying limits over time;
 - Proposal for DCAMM to require Whole Building Life Cycle Assessment for projects exceeding a certain size;
 - Proposal for consideration of the BBRS to include embodied carbon in code.

The Council respectfully looks forward to submitting its final and complete embodied carbon reduction plan and recommendations on or before January 1, 2026. Please do not hesitate to contact me should you have any questions or concerns. Thank you for your consideration.

Sincerely,



Melissa Hoffer, Co-Chair
Climate Chief, Commonwealth of Massachusetts

Cc: Adam Baacke, Co-Chair
Commissioner of the Division of Capital Asset Management and Maintenance