



December 5, 2025

To: Board of Directors, (BoD)
International Code Council

From: Vanessa Hostick Rempe
Chair, Sustainability, Energy, and High-Performance Code Action Committee (SEHPCAC)

RE: Scoping for development of embodied greenhouse gas (GHG) requirements

Council Policy 31-07 (CP 31) says that Code Action Committees (CACs) “*should consider the overall scope of the ICC Family of Codes in their work.*” CP 31 then assigns the primary responsibility to enhance the technical requirements of the International Codes to CACs by code or chapters of code to align CAC expertise with code content. The SEHPCAC is assigned primary responsibility for the International Energy Conservation Code (IECC), the International Green Construction Code (IgCC), and Chapter 11 of the International Residential Code (IRC).

Historically, provisions related to the regulation of embodied carbon¹ in construction materials have been addressed through the IgCC. Within the scope of the ICC family of codes, embodied carbon is a measure of emissions (GHGs)² attributed to the manufacture, transportation, construction, maintenance, replacement, and end-of-life treatment of construction materials. It is distinct and separate from the GHGs that are attributed to energy use in the building, also known as operational carbon. Requirements for reporting or minimizing embodied carbon are implemented using Environmental Product Declarations (EPDs) and Life Cycle Assessment (LCA) and continuous maintenance of that technical work continues at Work Group 9 of the ASHRAE Standard 189.1 committee. The participation in the development of future IgCC changes related to embodied carbon, therefore, falls to SEHPCAC through formal comment and informal coordination with members of the Standard 189.1 committee.

Similarly, ICC 700, the National Green Building Standard, which is referenced by the IgCC, provides requirements for residential buildings that are out of the scope of the IgCC. It also regulates embodied carbon through requirements related to EPDs and LCA. More, RESNET/ICC Standard 1550 intends to provide a standardized method to calculate and report the embodied carbon impact of homes.

¹ Embodied carbon is a term of art encompassing carbon dioxide, methane, and nitrous oxides.

² The IECC, IgCC, IRC, and ICC 700 regulate operational carbon (GHGs) through energy efficiency and load management and renewable generation requirements.

Additionally, the draft ICC Performance Code (ICC PC) regulates embodied carbon in Chapter 10 and, further, building energy performance in Chapter 9 (even though the IECC has multiple performance paths). Further, ASHRAE/ICC Standard 240P addresses both embodied and operational carbon.

SEHPCAC has concerns with the fragmented approach to GHG regulation across the ICC family of codes. We see the following as problematic:

- Development of technical provisions addressing the same content in multiple codes and standards will almost certainly lead to conflicting provisions. At the same time feedback was received from interested parties expressing concern about embodied carbon only being regulated within certain codes such as the IgCC.
- The SEHPCAC, ICC's expert technical body for the topic, has no responsibility or authority to advocate in IBC, ICC PC, ICC 700, ASHRAE/ICC Standard 240P, or RESNET/ICC Standard 1550 development.
- IBC code hearing committees (Structural in 2022 and General in 2025) have been tasked with making decisions on embodied carbon content outside of their specific committee expertise.
- Affected industries are over-taxed addressing the same content in multiple codes, leading to diminished expert participation in content development and challenging designers and enforcers where such content has been adopted.

SEHPCAC requests the BoD make the following clarifications to optimize the ongoing development of requirements in the family of International Codes to address embodied GHGs:

- Make a clear statement on where embodied carbon will be regulated within the family of International Codes.
 - ⊖ When developing said statement, be aware that SEHPCAC has the following concerns related to the regulation of embodied carbon. The first is that inconsistent language may be developed across the Family of International Codes. The second is the ability of jurisdictions to adopt embodied carbon regulations that meet their community's climate and sustainability goals.

- Assign, in addition to existing authorities under CP31 scoping, any relevant content of ICC PC, ICC 700, ASHRAE/ICC Standard 240P, and RESNET/ICC Standard 1550 as primary responsibilities of the SEHPCAC consistent with Section 3 of CP 31. Doing so would permit SEHPCAC to comment on proposed changes to these standards.

SEHPCAC welcomes the possibility of participation in development of the ICC PC, ICC 700, ASHRAE/ICC Standard 240P, and RESNET/ICC Standard 1550 and trusts the BoD sees the merit of that participation.

Sincerely,

A handwritten signature in blue ink that reads "Vanessa Hostick Rempe". The signature is written in a cursive, flowing style.

Vanessa Hostick Rempe

Chair, Sustainability, Energy, and High-Performance Code Action Committee (SEHPCAC)