



Guidance on Implementing Buy Clean

Buy Clean is a procurement policy approach that aims to fill a current gap in climate policy by incorporating low-carbon construction purchasing requirements that address the greenhouse gas emissions from the supply chain and manufacturing of construction materials.

This document aims to provide an overview of key stakeholders and strategies for addressing the implementation challenges related to Buy Clean policy.

Want to learn more?
Check out the rest of the series below

- [Embodied Carbon 101](#)
- [What is Buy Clean?](#)
- [Guidance on Disclosure](#)
- [Steps to Develop a Buy Clean Policy](#)

Successful implementation strategies

Buy Clean policies vary depending on their geographic and political context, but all are procurement policies that (at a minimum) require embodied carbon disclosure on building materials. To learn more about Buy Clean policies, check out [What is a Buy Clean Policy?](#)

Table 1 summarizes the perceived costs and challenges of Buy Clean, as well as strategies for mitigating them.

High-level strategies for successful Buy Clean implementation

1. **Start simple** with a short list of high-impact materials
2. **Engage stakeholders** early and often (see Figure 1)
3. **Align with existing frameworks and tools** to reduce training requirements and administrative burdens on manufacturers and project teams
4. **Phase in the policy over time** (see Figure 2)
5. **Provide education and training** directly or through partnerships with other organizations

Table 1. Mitigating potential costs and challenges associated with Buy Clean. These recommendations are primarily based on findings from the [2019 Buy Clean Washington Study](#) commissioned by the State of Washington.

Potential challenges/costs	Mitigation strategies
<p>EPD development Developing EDPs can cost \$5000-\$50,000, depending on the complexity of the product and existing data/resources.</p>	<ul style="list-style-type: none"> ● Partner with industry associations and other organizations to support the development of free tools that simplify EPD creation ● Set compliance exemption criteria for small businesses ● Provide tax breaks or other incentives for creation of EPDs
<p>Data collection Costs could arise from staff time (including contractors and other project team members) to manage the collection of EPDs and material quantities.</p>	<ul style="list-style-type: none"> ● Utilize existing, publicly accessible tools and databases to collect and store EPDs and material quantities ● Provide accessible training and compliance guidance
<p>Developing embodied carbon standards Costs could come from government staff time or consultant fees to develop methodologies and collect and analyze data.</p>	<ul style="list-style-type: none"> ● Adopt uncertainty ranges to avoid contested compliance ● Use standards established by third-party organizations ● Set a high initial standard that decreases over time to meet goals
<p>Verifying compliance Costs could arise from manufacturer staff time to furnish documentation, and from government staff time to verify documentation.</p>	<ul style="list-style-type: none"> ● Begin with incentivizing compliance (instead of penalizing non-compliance) and phase in requirements ● Set compliance exemption criteria or a hardship clause ● Provide model specifications ● Provide training and support
<p>Confusion about policy Costs could arise from project delays resulting from confusion about policy requirements.</p>	<ul style="list-style-type: none"> ● Coordinate communication and compliance requirements across different government agencies ● Implement pilot projects ● Phase in compliance after a voluntary trial period ● Provide training and support

Stakeholder engagement and support

Buy Clean impacts a large range of stakeholders, not just those who manufacture eligible materials (see Figure 1). Government- industry partnerships can inform policy development and garner industry support.

Figure 1. Overview of Buy Clean policy stakeholders



Phasing in implementation

An incremental enforcement timeline that phases in requirements over several years can mitigate many of the perceived costs and challenges related to Buy Clean.

Phasing in requirements allows:

- Manufacturers to create EPDs and build capacity to meet policy requirements
- Project teams to receive training on compliance
- Government agencies to refine requirements and implement lessons learned from early adopters

Timelines are particularly important to Buy Clean legislation with standards limiting a product’s carbon footprint. See Figure 2 below for an example of how requirements could be staggered.

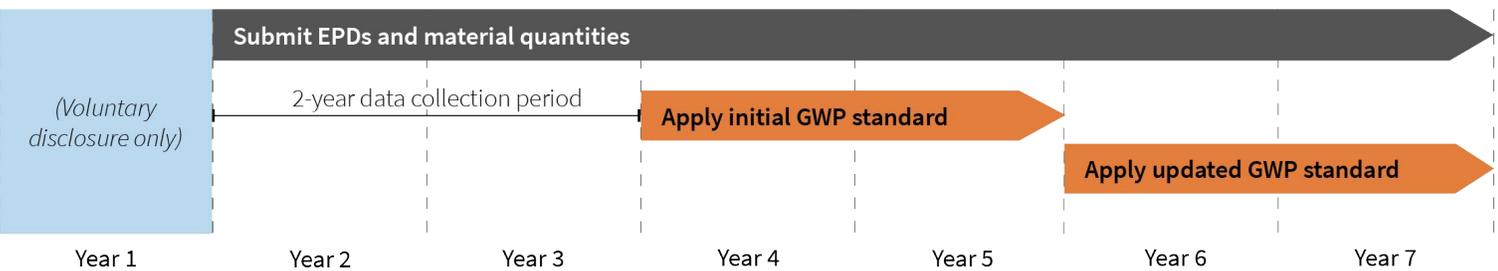


Figure 2. Theoretical enforcement timeline for a Buy Clean policy.

Dedicated programs

If funding is available, a dedicated government program with the following elements can lead to higher success:

- Cross-agency implementation teams to maintain clear, consistent communication with the public
- Online resource portal to collect and respond to questions and share resources
- Research grants and support of technical infrastructure development
- Reporting on policy outcomes
- Pilot projects to overcome concerns and demonstrate compliance paths
- Education and training for staff managing the program