



Walter Wright, Jr.
wwright@mwlaw.com
(501) 688.8839

Low Embodied Carbon Material Requirements: General Services Administration Interim Inflation Reduction Act Pilot Project

05/25/2023

The United States General Services Administration ("GSA") announced pilot interim requirements for the use of low embodied carbon construction materials in GSA projects funded by the Inflation Reduction Rate ("IRA") of 2022.

GSA states that this pilot project is being implemented in collaboration with the United States Department of Transportation's Federal Highway Administration and the United States Environmental Protection Agency.

The stated purpose of the pilot program is to apply such requirements in order to:

- Help gain actual market availability insights
- Inform adjustments that may be needed
- Allow GSA to issue a final set of Material Requirements for its IRA construction program

The pilot program is stated to include:

- 11 new construction projects
- Land port of entry projects
- Limited scope modernization projects
- Paving projects

The estimated value of the pilot program is stated to \$300 million.

Note that the IRA provides \$3.75 billion in funds that GSA can invest in federal buildings to help reduce carbon emissions and catalyze innovation. The IRA includes \$2.51 billion to procure low embodied carbon materials for construction and renovation projects.

GSA states that the pilot interim requirements are based on the United States Environmental Protection Agency's Interim Determination.

The interim IRA low embodied carbon material requirements will be applied to IRA-funded purchases of the following construction materials:

- Concrete (and cement)
- Asphalt
- Steel

- Glass

Note that these requirements are stated to not supersede existing laws such as the Buy American Act of 1933 or the Trade Agreements Act of 1979.

A copy of the pilot project requirements can be downloaded [here](#).