



Buy Clean Initiatives & Steel – mid-2025 updates:

Jurisdiction	Coverage of Steel	Requirements	Timeline / Status
California (BCCA)	Structural steel (hot-rolled sections, plate, HSS) and reinforcing steel	Facility-specific EPDs required; maximum GWP limits set and periodically updated by CA Dept. of General Services	Active since 2021; GWP thresholds enforced and under periodic review
Colorado (BCCO)	Steel, concrete, glass, asphalt	EPDs required for public projects; no binding GWP caps yet	Enacted (2021); agencies currently collecting steel EPDs
Oregon	Includes steel in lifecycle assessments for infrastructure materials	Requires LCAs/EPDs for covered materials; working toward benchmarks	Enacted (2022); early implementation, data gathering stage
Washington (Buy Clean, Buy Fair Act)	Steel, concrete, and wood in state-owned buildings	Embodied carbon reporting; state database to track EPDs; eventual procurement guidance linked to reporting	Enacted (2024); reporting tools and rules under development
Maryland (Buy Clean Maryland Act)	Steel not covered (concrete only)	Cement/concrete only; framework could expand to steel later	Enacted (2023); concrete GWP limits due by 2026
Minnesota (Buy Clean, Buy Fair Act)	Steel explicitly within scope	Task Force to set procurement standards; EPDs and possible GWP limits under discussion	Enacted (2023); Task Force active, rules not finalized



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Federal – GSA	Structural steel and rebar for federal building projects	Requires EPDs and compliance with low-embodied carbon procurement standards (dual standard with interim GWP benchmarks)	Active since 2023; enforceable in federal procurement
Federal – FHWA	Steel in highways/bridges (guardrails, rebar, etc.)	Buy Clean rule proposed but on hold ; would require EPDs and GWP thresholds	Pending; uncertain timeline

Takeaway:

- **California** → only state with **enforceable steel GWP limits today**.
 - **Colorado, Oregon, Washington, Minnesota** → steel covered, but rules are **transparency / reporting only (for now)**.
 - **Maryland** → concrete only (no steel yet).
 - **Federal (GSA)** → active steel requirements in place, however, we've not had feedback from our initial contacts regarding status; **FHWA** stalled.
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