

MEMORANDUM

TO: Customers and Stakeholders
FROM: Adam Shoemaker
Director of Corporate Sustainability
DATE: 12/29/2024
SUBJECT: Recycled Content Data in SustainabilityPRO for Cold-Formed Steel Framing Systems

Purpose

This memo provides a detailed explanation of the methodology used to calculate the recycled content data reported in alignment with our Environmental Product Declarations (EPDs) for Cold-Formed Steel Framing Systems, as found on [SustainabilityPRO](#). We aim to ensure transparency and clarity regarding this data.

EPD Overview

We offer four EPDs for our Cold-Formed Steel Framing Systems:

- [Cold-Formed Steel Framing Systems EPD – All Plants](#)
 - Reporting Period: 4/1/2021 to 3/31/2022
- [Cold-Formed Steel Framing Systems EPD – Plant Specific: Riverside, CA](#)
 - Reporting Period: 4/1/2021 to 3/31/2022
- [Cold-Formed Steel Framing Systems EPD – Plant Specific: Woodland, CA](#)
 - Reporting Period: 4/1/2021 to 3/31/2022
- [Low Embodied Carbon \(LEC\) Cold-Formed Steel Framing Systems EPD](#)
 - Reporting Period: 4/1/2022 to 3/31/2023

Recycled Content Data: Collection and Calculation

Our recycled content data is calculated using a comprehensive, plant-specific, and vendor-specific analysis, as detailed below:

1. **Annual Steel Purchases:** We determine the total pounds of steel purchased at each manufacturing plant over a calendar year.
2. **Vendor-Specific Sourcing:** For each plant, we identify the weight of steel purchased from each vendor during the same year.
3. **Recycled Content from Vendors:** We collect recycled content information (both pre-consumer and post-consumer) directly from each steel vendor. When no vendor specific information is available, we use the LEED accepted default value of 25% post-consumer recycled content and 0% pre-consumer.
4. **Weighted Average Calculation:** We then complete a plant specific, vendor specific weighted average calculation to determine the average recycled content for all the steel products leaving our plants for that reporting period, and this is what you will find on [SustainabilityPRO](#).

Plant Variability

Each of our manufacturing plants has a unique set of:

- **Vendors:** No two plants source from the exact same suppliers.
- **Production Volumes:** Each plant produces a different amount of steel annually.

This plant-specific approach ensures accuracy but results in variability in recycled content data between plants and across reporting years as our supply chain evolves.

Data Vintage and Update Schedule

The recycled content data currently reported in alignment with our EPDs is based on our analysis of steel purchases made during periods listed above for the corresponding EPDs. Due to the intense and laborious nature of collecting and calculating these plant-specific and vendor-specific weighted averages, we will update this data approximately every three years. You can always find the year of the latest recycled content dataset on [SustainabilityPRO](#).

Conclusion

We are committed to transparency and providing accurate information to support our customers' sustainability goals. This memo clarifies our methodology and demonstrates the rigor of our recycled content calculations.

For any further questions or additional information, please don't hesitate to contact us.