September 15th, 2026

Re: Representativeness of Industry-Average EPDs

To Whom it May Concern,

MCA updated and re-issued Industry-Average EPDs for Roll Formed Roof and Wall Cladding, Insulated Metal Panels (IMP) and Metal Composite Materials dated August 11th, 2026. These EPDs were developed under the governing document *UL 10010-5: Product Category Rules for Part B: Insulated Metal Panels, Metal Composite Panels, and Metal Cladding, Version 2*.

Each of the subject EPDs lists names of companies who provided data for the declared products. However, the governing PCR allows coverage of Industry-Average EPDs to include other MCA manufacturer members who submitted data by virtue of Section III, Industry-Average EPD Requirements, which states (emphasis added):

> Manufacturers may work together to develop an industry-average EPD using this PCR. Under these conditions, an "industry" can represent a group of manufacturers that are members of one or more trade associations, or that produce or sell the declared product in a defined region or market. **Thus, an industry-average EPD is intended to represent production by the defined group of manufacturers.**

MCA conducted the requisite market surveys for North America and collected necessary metrics to establish representativeness as required by the PCR. As Berridge Manufacturing Company contributed data and was an MCA manufacturer member at the time, the subject EPD applies to them as well.

If you have any questions, please contact MCA at info@metalconstruction.org

Sincerely,
Robert A. Zabcik, Technical Director

Cc: Jeff Henry, MCA
Peggy Doherty, MCA

1061 American Lane, Suite 310, Schaumberg, IL 60173
847.375.4718 • Fax 847.375.6488 • www.metalconstruction.org
Proud Sponsor of METALCON | www.METALCON.com

BUILD LEGACIES METAL