

## RESNET® Standards Public Comment and Proposed Change Form

### Comment/Explanation\*:

*Include your justification for your proposed change to the draft standard below.*

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The language requiring the destruction of records after 2 years is *idiotic*. It has the appearance of hiding data from regulators like the SEC.

First, it violates the RESNET MINHERS Standards for record-keeping (102.2.9.4). Considering the assumption is these Embodied Carbon Rating would be registered with a Registry and undergo a QC process (as the Foreword indicates), to have this standard explicitly set a **mandatory** deletion of records *by the Certified Rater* is preposterous.

Second, *assuming* these Embodied Carbon Ratings will be used to meet disclosure requirements to the SEC for large, publicly traded companies in order to comply with rules associated with the ISO 14000-body of standards, the IRS requires documents to be stored for a minimum of three (3) years, though in some situations up to 7 years.

For those two reasons alone, this 2 year retention period should be extended to handle the “worst-case” scenario of 7 years, and the mandatory language around deletion should be removed. It ought to be up to the individual company to decide if they delete it at that point.

### Proposed Change to the Draft Standard\*

*Use “strikethrough” and “underline” formatting to indicate all proposed changes. Changes must be shown with “hard-formatting” strikethrough and underline, not “track changes”.*

*Use a color other than red to indicate proposed changes to the draft.*

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1. Documentation must be stored as physical documents or by digital/electronic means for at least 2 years upon completion of the *Confirmed Assessment*. Documentation shall be destroyed at the end of this 2-year retention period.
2. Documentation must be stored as physical documents or by digital/electronic means for at least seven (7)2 years upon completion of the *Confirmed Assessment*. Documentation shall be destroyed at the end of this 2-year retention period.