**Comment/Explanation\*: (Page 4; Section1; Objection; General)***Include your justification for your proposed change to the draft standard below.*  
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**COMMENT 1:** While the standard provides a well-organized and understandable embodied carbon accounting methodology in the overall sense, the purpose statement needs to more accurately align with the scope and limitations of the standard to avoid misunderstanding of what it actually delivers in its methodology (i.e., truth in advertising). Two examples of how this might be better achieved are proposed with this comment; one is a minor edit to Section 1.0 and the other is an added informativer note to draw attention to the treatment of important/significant limitations, some of which are addressed much later in Appendix, Section 10.5. These limitations should be front and center (even though partially addressed in the scope section). Separate comments will address the scope section and also potential omissions or incompleteness related to the limitations discussed in Appendix Section 10.5. Finally, other comments (also provided separately) may help resolve at least one of the more significant limitations (discussed in the proposed informative note below) by providing additional content for the standard. But, this comment is based on what the standard currently contains and does or does not do.

**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.*\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

# 1 Purpose

The provisions of this document establish a **limited-scope** methodology**1 for** quantifying and reporting embodied greenhouse gas emissions associated with building products using data commonly gathered by energy raters and according to the system boundary and data sources defined in Section 5.

1(Informative note): The user is advised that this standard does not provide a complete quantification of the embodied carbon contribution all products, elements and systems that comprise a home. Also, building site infrastructure is ignored and can contribute significantly to a building project. For the items that are measured as part of the home construction, the accuracy of data may vary substantially for any given product which may bias the total result for any given home to varying degrees. In addition, products that have a positive impact or handprint (e.g., CO2e emission reduction) on the operational energy use and carbon footprint of a home are not considered, except in the selective case of materials that store atmospheric carbon where such future storage is treated idealistically without consideration of full life cycle implications and eventual stored carbon release back to the atmosphere. Thus, the standard does not provide a holistic or complete accounting of embodied (or “upfront”) carbon and omits potentially important carbon emissions impacts (increases or reductions) associated with later stages of a building or building product’s life cycle. For additional information related to these and other significant limitations, refer to Appendix Section 10.5.