**Comment/Explanation\*: (Page 17; Section 6.2.2; Objection; Technical)***Include your justification for your proposed change to the draft standard below.*  
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**Comment #5**: Move Section 6.2.2 Gross carbon storage for products into Section 6.3 for optional embodied carbon calculations. This should not be included in the main calculation methodology because of the idealized (eternalized) treatment of stored carbon in biogenic materials used for building construction. We must acknowledge that this idealized assumption of “eternal” 100% storage is not correct (or is at least seriously biased) and that there are all kinds of outcomes and events that result in less than idealized carbon storage over the life of a product or building structure (and its end of life scenarios). This is also a controversial issue that lacks sufficient disclosure of different viewpoints and implications in the limitations discussed in Appendix Section 10.5 (which relates also to my prior Comments 1 and 2). This also relates to and should be considered together with my next Comment 6.

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

### 6.3.1 ~~6.2.2~~ Gross carbon storage for products

NOTE: This change will also require moving Section 6.2.3. It will also require in Section 8 reporting requirements that it be reported as an optional result (not part of the standardized result which also must be reported).