**Comment/Explanation\*: (Page 40; Section 10.5; Objection; Technical)***Include your justification for your proposed change to the draft standard below.*  
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**Comment #7**: Section 10.5 Limitations of the methodology (informative) is not complete and is crucial to a proper understanding of the standard and what it delivers. It incompletely addresses some limitations (like carbon storage assumptions and uncertainties or concerns) and omits others, such as addressed in my prior Comments 1 and 2. In some cases statements may be misleading, like the following:

By requiring reporting of stored carbon as a distinct A1-A3 result, the Standard enables users to transparently identify and quantify stored carbon at the product and building level, but the Standard does not attempt to ascribe any value to this stored carbon.

To the contrary, this standard inherently ascribes value to stored carbon without explaining what it fails to account for. This is clearly evident in the example given later in Section 10.6 where large “negative” values are assigned which means at face value that there is huge offsetting value from a numeric standpoint based on this standard. But, what this “stored carbon” really means is not mentioned in the example and likely not in reported results (as in the example of Section 10.6). This is a controversial matter still in the industry and academia and should have better justification for appropriate treatment before being included in this standard at a maximum idealistic value.

From my earlier comments (1 and 2), one example of an omitted limitation of the standard is suggested as a proposed change below. There are others (e.g., see my comments 5 and 6), but the main point of this comment is that the limitations need to be addressed more comprehensively and transparently, including information that may not align with the approach or philosophy this standard has taken. I would recommend that the committee consider forming a stakeholder group to work on revising and enhancing Section 10.5.

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

One possible or example addition to Section 10.5 (among others mentioned above):

“This standard also excludes any operational emissions savings or handprint of materials like insulation that can save up to one or two orders of magnitude of carbon emissions more than the upfront or even life-cycle material embodied emissions. Thus, for some materials this standard provides an incomplete analysis of total carbon implications.”

Note also that various statements in the limitations should be well-referenced, including the one I’ve suggested above. Some references that substantiate the above statement (and provide context) include:

**Decarbonization of Buildings: A Review of Climate Science, Policies, Practices, Data, and Recommended Actions for Buildings and Building Materials**

<https://www.appliedbuildingtech.com/rr/2312-01>

Refer in particular to the Executive Summary and Sections 4.8 and 4.9 of the above study for a review of multiple relevant independent studies and data. This fact sheet also summarizes some of the salient findings of the above study: <https://www.continuousinsulation.org/sites/default/files/uploads/attachments/node/210/ci-factssheetdecarbfinal.pdf>