**Comment/Explanation\*:***Include your justification for your proposed change to the draft standard below.*
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The calculation method for biogenic carbon outlined in Section 6.2.2 does not follow an ISO/ASTM standard for calculating biogenic carbon. The ISO-21930:2017 standard should be referenced and the relevant calculation methods should be included.

Furthermore, if materials wish to use biogenic carbon in this calculation, they must reference published values within an EPD that follows PCR for those products. The inclusion of a arbitrary calculation method as outlined in Section 6.2.2 will overestimate the benefits from these products, undercut the confidence in, and undermine any actual benefits of biogenic carbon provided by these products in the long term.

The [ACLCA guidance document for ISO 21930:2017](https://aclca.org/wp-content/uploads/ISO-21930-Final.pdf) includes guidance for PCR and EPD development with regard to biogenic products. As a part of these recommendations, they demand that a more rigor be placed on biogenic carbon claims (Section 8.1.2). In particular, that wood-based products originate from a sustainably managed forest to be able to be considered. The RESNET Standard as written is wide open for misapplication and would allow users to utilize inputs that may not create realistic results, whether intentionally or not.

Because of all these factors, it is recommended that the exception contained within Section 6.2.2 be removed. Only products that have a 3rd party LCA/EPD should be permitted to claim biogenic carbon.

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

### 6.2.2 Gross carbon storage for products

Gross carbon storage for each *Minimum Assessed Product* that includes *biogenic carbon* as per Section 5.3.5 and carbonation as per Section 5.3.6 shall be calculated as follows:

**GCSproduct = Material Quantity x Carbon Content Factor**

Where:

GCSproduct = Carbon storage for a project-specific quantity of a *building product* for life-cycle stages A1-A3 (kg CO2)

Material Quantity = Total quantity of product calculated as per Tables 10.1.1 and 10.1.5

Carbon Content Factor = *Biogenic carbon* or carbonation associated with a *building product* for life-cycle stages A1-A3 based on a data source selected according to Table 5.3.2. ~~If the relevant data source does not include a carbon content factor, the carbon content factor shall be calculated as follows:~~

**~~Carbon Content Factor = Material Quantity (mass) x Carbon Content x 3.67~~**

~~Where:~~

~~Carbon content factor = Mass of atmospheric~~ *~~carbon dioxide~~* ~~stored in the product~~

~~Material Quantity = Mass of product calculated as per Tables 10.1.1 and 10.1.5~~

~~Carbon Content = Percentage of product mass represented by carbon content x Carbon content of feedstock material~~

~~3.67 = Molar mass conversion factor from carbon content to CO2 content~~