**Comment/Explanation\*:***Include your justification for your proposed change to the draft standard below.*
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CLF recommends that carbonation be excluded from the standard at this time until calculation guidance can be provided. ISO 21930:2017 states that, “The quantification of carbonation as a part of the GWP shall be based on recognized methods for the calculation of carbonation and the underlying methodology shall be referenced in the project report and results interpreted with respect to uncertainty of calculations.” At this time, recognized methods for calculation do not exist in North America, as the only recognized guidance is in the European standard EN 16757, the European Product Category Rules for concrete and concrete elements. Therefore, RESNET should wait until agreed upon guidance is available in the North American product category rules for concrete. The current concrete PCR (and draft) do not include carbonation calculation guidance.

Additionally, this will not be a big change as carbonation is more relevant for B and C stages, which are excluded from RESNET, with the exception of some precast concrete elements that may be subjected to carbonation during production if induced or due to long-term storage before delivery (EN 16757: 2022).

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

5.3.6 Carbonation

Sequestered carbon from the process of carbonation should be excluded from calculations at this time. ~~shall be calculated in accordance with Section 6 and reported for LCA modules A1-A3 only.~~

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