**Comment/Explanation\*:***Include your justification for your proposed change to the draft standard below.*  
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The Carbon Leadership Forum (CLF) recommends removing the recommendation to calculate an 80th percentile value from available GWP factors for a product. This is overly burdensome to calculate for each individual product and is not likely that practitioners would be able to calculate this for any missing data. Instead, if values are not available, practitioners could use a benchmark factor 1.2 times greater than the closest proxy EPD, as is already included in the standard.

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

**Proposed Change to the Draft Standard\*:**

~~Where no~~ *~~product-specific EPD~~* ~~or~~ *~~LCA~~* ~~or~~ *~~industry-average EPD~~* ~~for~~ *~~comparable product type~~* ~~exists to provide a~~ *~~GWP factor~~* ~~for a product, a~~ *~~benchmark~~**~~GWP factor~~* ~~that represents the 80th percentile of all~~ *~~GWP factors~~* ~~within the same software database for~~ *~~comparable product types~~* ~~shall be used.~~

Where a *GWP factor* from a single EPD or LCA for *comparable product types* is available but is not specific to the product being assessed, the *benchmark* *GWP factor* shall be 1.2 times greater than the declared *GWP factor* in the single EPD or LCA. For carbon storage values, no multiplier shall be applied.