**Comment/Explanation\*:***Include your justification for your proposed change to the draft standard below.*  
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The Carbon Leadership Forum (CLF) strongly suggests removing all references and requirements to reporting of **net** embodied carbon emissions for a product. Biogenic carbon should only be reported separately, as is recommended by the *U.S. EPA C-MORE Draft EPD Criteria for Data Quality and Transparency*, *Project Life Cycle Assessment Requirements: ECHO Recommendations for Alignment, Version 1.0,* and is explicitly required by the majority of North American policies and standards, including CALGreen 5.409 reporting guidance, Vancouver’s Embodied Carbon Guidelines, the NRC Practitioner Guide (2024), Toronto TGS v4 (public project requirements), NYC EO 23 LCA Guidance, the ASCE/SEI draft Prestandard, and Draft standard ICC/ASHRAE 240p (see pg 42, Fig 8 of *Project Life Cycle Assessment Requirements: ECHO Recommendations for Alignment).*

EPA’s draft data quality and transparency criterion #17 states that EPDs should: “report impacts from biogenic carbon, Module D, book and claim systems, and other carbon dioxide removal mechanisms separately, in line with the requirements from the relevant PCRs.”

This recommendation is particularly important in the context of this standard’s limitation to only A1-A3. Accounting for biogenic carbon only in stages A1-A3, rather than across the life cycle A-C, does not account for the end of life emissions when the stored carbon is inevitably released at the end of a product’s life. This also contradicts existing product category rules (PCRs) that dictate the creation of EPDs. This method thereby includes counting the uptake of carbon in bio-based materials, but excludes the end of life release of that carbon, resulting in large negative numbers that do not reflect the complete biogenic carbon flow.

At a minimum, biogenic carbon storage must be reported separately until the scope of this standard is expanded to include the additional stages to align with existing standards and more accurately report biogenic flows throughout the process. This means that all references to a net value must be removed from reporting and calculations.

References:

U.S. Environmental Protection Agency (EPA). (2024). *U.S. EPA C-MORE Draft EPD Criteria for Data Quality and Transparency* <https://www.epa.gov/system/files/documents/2024-12/c-more_draft_epd_criteria_data_quality_transparency.pdf>

Lewis, M., Watkins, L., Loader, C., and Lambert, M. (2024). *Project Life Cycle Assessment Requirements: ECHO Recommendations for Alignment, Version 1.0.* ECHO Project. <https://www.echo-project.info/publications>

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

Each *Minimum Assessed Product* shall have calculated the gross *embodied carbon* emissions~~,~~ and gross carbon storage ~~and net~~ *~~embodied carbon~~*.

6.2.3 Net Embodied Carbon for Products

~~Net~~ *~~embodied carbon~~* ~~emissions for each~~ *~~Minimum Assessed Product~~* ~~shall be calculated as follows:~~

**~~NEC~~~~product~~ ~~= GEM~~~~product~~ ~~– GCS~~~~product~~**

~~Where:~~

~~NEC~~~~product~~ ~~= Net~~ *~~embodied carbon~~* ~~for a project-specific quantity of a~~ *~~building product~~* ~~for life-cycle stages A1-A3 (kg CO~~~~2~~~~e)~~

~~GEC~~~~product~~ ~~= GWP for a project-specific quantity of a~~ *~~building product~~* ~~for life-cycle stages A1-A3 (kg CO~~~~2~~~~e)~~

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