**Comment/Explanation\*:***Include your justification for your proposed change to the draft standard below.*
\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

The latest evidence from climate science on the impacts of carbon sequestration potential and scientifically valid definitions of ‘carbon offsets’, ‘carbon sequestration’, and ‘net-zero’ all unequivocally indicate that any sequestered carbon with a life-span of less than 1,000 years has virtually **no impact on the climate**.

As the average life-span of buildings is less than 100 years, any sequestration potential of buildings is at least an order of magnitude *less* than the minimum required for climatic impact.

Promoting the efficacy of ‘biogenic carbon’ or other ‘carbon sequestration’ potentials of buildings will only result in worsening climate impacts as effort is placed on ineffective remedies to GHG emissions.

Sources:

Brunner, C., Hausfather, Z. & Knutti, R. Durability of carbon dioxide removal is critical for Paris climate goals. *Commun Earth Environ* **5**, 645 (2024). https://doi.org/10.1038/s43247-024-01808-7

Allen, M.R., Frame, D.J., Friedlingstein, P. et al. Geological Net Zero and the need for disaggregated accounting for carbon sinks. Nature (2024). https://doi.org/10.1038/s41586-024-08326-8

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

Any reference to carbon sequestration capacity of a building, or “carbon positive” materials, should be struck from this document and a pre-amble should clearly indicate that using buildings with the intent of carbon sequestration are an ineffective solution and have the potential to worsen the effects of climate change. Focus must instead be placed on zero-emission building and buildings with as low-embodied carbon as possible, either through deployment of sufficiency in design or lower-embodied carbon material.