**Comment/Explanation\*:***Include your justification for your proposed change to the draft standard below.*  
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Section 4: Embodied Carbon Emissions Assessment Requirements

**4.1 Assessment Types**

*Comment:* As a member of the Toronto BioBuild Collective, I support the strategy of allowing for both Projected and Confirmed Assessments. This flexibility aligns with the diverse needs of practitioners working to integrate bio-based materials and innovative design strategies into residential construction.

Section 5: Embodied Carbon Emissions Data Requirements

**5.2 Scope of Life Cycle Stages**

*Comment:* As a member of the Toronto BioBuild Collective with a focus on bio-based materials and sustainable construction practices, I agree that limiting the scope of life cycle stages to A1-A3 is appropriate at this time. The lack of reliable data for other life cycle stages in the homebuilding sector makes this a practical choice. I support the decision to wait until the data ecosystem matures before expanding the scope to include additional stages.

**5.3.4 Quantification of Uncertainty of GWP Factors**

*Comment:* In prioritizing transparency in embodied carbon calculations, I agree with the exclusion of uncertainty factors in this standard. The qualitative methods for calculating uncertainty currently available do not provide consistent or reliable results. For example, assessing geographical representativeness would be particularly challenging for bio-based materials due to variability in supply chains and regional contexts. I believe quantitative methods are more suitable but acknowledge that these require further development to be broadly applicable.

**5.3.5 Biogenic Carbon**

*Comment:* As an advocate for the use of bio-based materials, I strongly support the calculation and reporting of biogenic carbon flows in this standard. Although these flows are limited to life cycle stages A1-A3, I appreciate the mandatory wording in Section 8.1.8, which ensures users are aware of these limitations. The inclusion of biogenic carbon reporting is critical for recognizing the substantial value of carbon storage in long-lived bio-based building products. I believe this approach allows stakeholders to apply their own valuation factors and encourages further consideration of carbon storage benefits.

Section 10: Normative References and Requirements

**10.2 Waste Rates for Products (Normative)**

*Comment:* I support the requirement that all products include a waste rate as calculated in Table 10.1.1 or through documented custom waste rates. Accurate accounting for material waste is essential in promoting sustainable practices, especially when working with bio-based materials that often have unique waste factors during installation.

**10.1.5 Reference Table for Residential MEP Component Default GWP Values**

*Comment:* I am supportive of including MEP products in this standard. The reference table provides practical and reasonable defaults that are helpful for builders and designers.

**10.4 Building Components Exclusions**

*Comment:* The “building only” approach outlined in this standard is consistent with my goals as a practitioner. I agree with the exclusion of non-building elements and believe this focus ensures that the standard remains practical and targeted, particularly for residential applications where simplicity and clarity are key.

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