**Comment/Explanation\*:***Include your justification for your proposed change to the draft standard below.*  
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It’s a major oversight that the whole-buiilding LCA calculation standard EN 15978 is not mentioned in this standard which is focused on buildings. Also note, there is a product category rule (PCR) for Buildings that would also be useful to align methods with international LCA practice (see [link to The International EPD System PCR Library](https://www.environdec.com/pcr-library), seach “Buildings”).

Issues with deviations from ISO 21930 and EN 15804+A2 standards:

* Term issues
  + Life cycle is hyphenated, but shouldn’t be. Ex. Life-cycle assessment, life-cycle stages.
* Concept issues
  + A1 to A3 are not life cycle stages, they are in the information modules in the “Product” life cycle stage.
* Methodology issues
  + No mention of the comparability requirements for EPDs/LCA studies from ISO 14044, ISO 21930/EN 15804?
    - Exclusion beyond A1-A3 isn’t an acceptable method.

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

See above.