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

The 80th percentile from less than five datapoints (as suggested in the prior paragraph regarding software databased) is not readily available, so we recommend that this section changes to “four or fewer EPDs or LCAs.” Additionally, the “1.2 times greater” language seems to be the application of an uncertainty factor, yet the next section states that uncertainty factors should not be applied. We agree with RESNET’s initial thinking behind the 1.2x uncertainty factor, but we believe the application of uncertainty should follow a spectrum of uncertainty based upon the quality of the proxy, rather than 20 percent across the board as this 1.2x factor suggests.

Per the [WRI Sector Supplement for Measuring and Accounting for Embodied Emissions in the Built Environment](https://ghgprotocol.org/sites/default/files/wri-embodied-emissions-sector-supplement-2022_1.pdf) (Built on GHG Protocol), uncertainty should range up to 40 percent. For instance, if an uncertainty factor is applied when using an industry-average EPD, the manufacturer that participated in the IW study should have a lower uncertainty value than a manufacturer that did not participate in the IW study.

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

Where a GWP factor from a ~~single EPD or LCA~~ four or fewer EPDs or LCAs for comparable product types is available but is not specific to the product being assessed, the benchmark GWP factor shall be the median GWP factor of the available EPDs or LCAs with the appropriate uncertainty factor applied per the WRI Sector Supplement for Measuring and Accounting for Embodied Emissions in the Built Environment. ~~1.2 times greater than the declared GWP factor in the single EPD or LCA~~

5.3.4 Quantification of Uncertainty of GWP Factors

No uncertainty factors shall be applied to GWP factors from ~~any data source used in calculations.~~ product-specific LCAs or EPDs for the specified product. Uncertainty factors shall be applied, however, for GWP factors from an industry-average EPD for a comparable product type or an LCA or EPD for a comparable product type.