**Comment/Explanation\*:***Include your justification for your proposed change to the draft standard below.*
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Because this Standard does not consider life cycle stages C1-C4, netting out biogenic carbon storage is problematic and misleading as this carbon is not stored forever. We strongly recommend that RESNET removes this component from the Standard and provides guidance that, for bio-based products, the A1-A3 GWP factor that does not consider biogenic carbon shall be utilized from EPDs, rather than the (often negative) GWP factor that considers biogenic carbon.

LCA standards support the justitication for our recommendation. EN15804 clearly states in NOTE 1 of section 5.2 that any product containing biogenic carbon cannot omit the declaration of modules C1-C4 and module D from its EPD. ISO 21930 section 7.2.7 details the accounting of biogenic carbon uptake and emissions during the life cycle, such that any uptake will have a corresponding export at end of life.

Therefore, if RESNET does not seek to expand the scope of this standard to include life stages beyond A1-A3, the “subtraction” or “netting out” of biogenic carbon storage should be removed.

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

6.2.3 Net embodied carbon for products

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

~~NECproduct = GEMproduct – GCSproduct~~

~~Where:~~

~~NECproduct = Net embodied carbon for a project-specific quantity of a building product for life-cycle stages A1-A3 (kg CO2e)~~

~~GECproduct = GWP for a project-specific quantity of a building product for life-cycle stages A1-A3 (kg CO2e)~~

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

Given that this Standard does not cover life cycle stages C1-C4, for bio-based products, the A1-A3 GWP factor that does not consider biogenic carbon shall be utilized from EPDs, rather than the (often negative) GWP factor that considers biogenic carbon.