**Comment/Explanation\*:***Include your justification for your proposed change to the draft standard below.*  
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Biogenic carbon storage is usually not considered in A1-A3 calculations. Net storage is contingent on assumptions about end-of-life disposition of materials. It also takes time for trees to regrow after they are harvested, which is needed to compensate for the emissions caused by harvesting and processing biogenic materials. Gross carbon storage may be reported independently of gross embodied emissions, but net storage calculations and reporting should be removed from the standard.

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

### ~~Net~~ *~~embodied carbon~~* ~~for products~~

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

**~~NEC~~~~product~~ ~~= GEM~~~~product~~ ~~– GCS~~~~product~~**

~~Where:~~

~~NEC~~~~product~~ ~~= Net~~ *~~embodied carbon~~* ~~for a project-specific quantity of a~~ *~~building product~~* ~~for life-cycle stages A1-A3 (kg CO~~~~2~~~~e)~~

~~GEC~~~~product~~ ~~= GWP for a project-specific quantity of a~~ *~~building product~~* ~~for life-cycle stages A1-A3 (kg CO~~~~2~~~~e)~~

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