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

Several definitions are flawed. The I have proposed changes below to address these concerns.

* “comparable” product type – when we talk about product types like brick, fenestration, insulation etc. we cannot say they are directly comparable. In many cases they are not. Per the propsed definition they may have similar manufacturing but different functions. Where the line is drawn for products to be truly “comparable” is fuzzy. For instance acoustic insulation can not be compared to a thermal wall insulation product or a drain pipe compared to a supply pipe. They are similar but very different due to their intended use and function. Are we comparing continuous insulation to cavity insulation? They serve similar but different functions. Therefore, I suggested some edits to try and provide better language for this term.
* Confirmed assessment – the key here is that the assessment is verified. Meaning the products are proven to be installed in the assessed home. The proposed changed addresses this missing link.
* Embodied carbon – it is not truly embodied carbon if it does not take into consideration the full life cycle impacts of the product. This is fact. To call something embodied carbon without it being such is misleading to users and the public.
* Projected assessment – projected assessments have their place in informing design but should never be the end all. They should always be accompanied by a Confirmed or Verified assessment. Anything short of this is a misuse of resources and time. Maybe even greenwashing.

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

***~~Comparable~~ Product Type*** – Building products that are ~~identical or~~ ~~materially~~ similar to the reference product in terms of composition, function, performance, manufacturing, installation, ~~and meeting the same code ,~~ and otherproduct characteristics, and that share the same Product Category Rules, and product standard requirements.

***Confirmed Assessment –*** An assessment accomplished using data verified by field assessment of actual installed products. ~~gathered from verification of Minimum Assessed Products of the home in accordance with this Standard~~.

***Embodied Carbon*** – The greenhouse gas emissions associated with the life cycle of building products. ~~For the purposes of this Standard, Embodied Carbon refers only to emissions from life cycle stages A1-A3, covering extraction, transportation of raw materials and production of building products.~~

***Projected Assessment –*** A~~n~~ preliminary assessmentaccomplished using GWP factors for all Minimum Assessed Products derived from construction documents.