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

This whole section seems to be trying to redefine Life Cycle Assessment. It is disingenuous to pretend this standard is providing an accurage life cycle picture if you do not at least allow other life cycle stages to be included and show a more complete assessment of carbon impacts.

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

## 5.21 Scope of Life Cycle Stages

The *system boundary* shall ~~address the following tier of~~ shall include life-cycle stage~~s[[1]](#footnote-1)~~ modules A1-3, and shall be permitted to include life cycle stages A4-5 and B1-7. The report shall clearly document life cycle stages included in the embodied carbon emissions estimate.~~:~~

~~Table 5.2.1 Scope of Life Cycle Stages~~

|  |  |
| --- | --- |
| **~~Tier~~** | **~~Life-Cycle Stages Included~~** |
| ~~I~~ | ~~Modules A1-A3~~ |

~~The~~ *~~system boundary~~* ~~shall not include any of the following:~~

1. ~~Quantification of on-site~~ *~~biogenic carbon~~* ~~sequestration where carbon flows occur outside of life cycle stages A1-A3[[2]](#footnote-2),~~
2. ~~avoided GHG emissions,~~
3. ~~on-site carbon capture activities,~~
4. ~~carbon offsets,~~
5. ~~carbon credits,~~
6. ~~renewable energy credits, or~~
7. ~~other environmental attribute crediting mechanisms.~~

~~(Informative Note) Subsequent tiers incorporating additional life cycle stages are intended to be added in future versions of this Standard.~~

1. ~~(Informative Note) Subsequent tiers incorporating additional life cycle stages are intended to be added in future versions of this Standard.~~ [↑](#footnote-ref-1)
2. ~~(Informative Note) Examples of this include the carbon sequestered by trees planted on site and other landscaping.~~ [↑](#footnote-ref-2)