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

The proposed text edits below reflect a couple of important issues:

* The title is about the sources of the data under given scenarios. While I think the authors would like the scenarios to be prioritized, the scenarios are what they are.
* The first sentence in 5.3.2 is very confusing as written. Simplify as suggested.
* Table Scenarios – it is not what is on the construction docucments but rather what is selected and installed that you need the data for. Also, LCA seems to be missing from (B).
* The green highlight is not changed text but highlighted to bring your attention to the italics. This word is not defined and should not be italicized.
* GWP Factor – This table column should be changed. Say what it is, it is the source of the GWP data.
* See my previous separate comment regarding the term “comparable product type”
* The sentence below the table should be changed to apply only to scenarios (B) and (C) for obvious reasons.
* Several language clean-ups in the paragraphs below the table.
* I believe the last sentence of 5.3.2 is meant to prevent someone from incorrectly using international data for U.S. or other country specific products where such data is not applicable and would result in incorrect accounting. I’m not sure my correction fixes it completely but the existing sentence makes the requirement super unclear.
* This is the place “benchmark” is most defined but note there are many areas where “benchmark” is shown italicized.
* Again, LCA is missing and fixing other issues in 5.3.3 per prior bullets.
* There is no justification for a 1.2 multiplier for industry wide data.
* Biogenic Carbon and Carbonation should be removed with these limitations. Other life cycle stages should be allowed.
* 5.3.7 corrects language.

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

### 5.3.2 GWP Data Sources ~~Hierarchy~~

Allowable *GWP factor* data sources shall be selected in accordance with ~~to match the highest available rank of resolution for the appropriate Scenario in~~ Table 5.3.2. Data ~~hierarchy~~ scenarios and *GWP factors* from Table 5.3.2 shall be documented ~~explicitly stated~~ in all reporting in accordance with ~~according to~~ Section 8.2.

Table 5.3.2 GWP Data Sources ~~Hierarchy~~

|  |  |
| --- | --- |
| **Scenario** | **GWP Data Source ~~Factor~~** |
| 1. When a specific product and manufacturer has been ~~referenced in the~~ *~~construction~~ documents selected andinstalled* | 1. *Product-specific* *EPD* for the specified product 2. LCA for the specified product |
| 1. When a specific product and manufacturer has been ~~referenced in the~~ *~~construction documents~~*selected and installed, but no *product specific EPD* or LCA is available | 1. *Industry-average EPD* for the *~~comparable~~ product type* 2. *Benchmark* valuefor the *~~comparable~~ product type* in accordance with section 5.3.3. 3. LCA for the *~~comparable~~ product type* 4. For MEP products, default values fromTable 10.1.5*.* |
| 1. When a product type has been ~~indicated in the~~ *~~construction~~* ~~documents~~ selected and installed*,* but no specific product and/or manufacturer has been specified | 1. *Industry-average EPD* for the *~~comparable~~ product type* 2. *Benchmark* value for the *~~comparable~~ product type* in accordance with section 5.3.3. 3. LCA for the *~~comparable~~ product type* 4. For MEP products, default values fromTable 10.1.5*.* |

The following requirements shall apply ~~are applicable~~ to all scenarios in Table 5.3.2(B) and (C):

~~For all applicable cases~~ where multiple data points with shared properties exist, the highest applicable *GWP factor* of those listed in the same dataset shall be used ~~assumed~~.

Where multiple sources exist for the same data source type, the data source that is most geographically representative shall be used.~~prioritizing the country of origin for the manufacture of the product first, then global data if unavailable~~. International data shall not be used unless it is confirmed that the installed product originated from another country.

### 5.3.3 Benchmark GWP factors

Where no *product-specific EPD* or *LCA* or *industry-average EPD* or *LCA* for the *~~comparable~~ product type* exists ~~to provide a~~ *~~GWP factor~~* ~~for a product~~, a *benchmark* *GWP factor* that represents the 80th percentile of all *GWP factors* within the same software database that uses current values for a regionally similar ~~for~~ *~~comparable~~ product type~~s~~*shall be used.

~~Where a~~ *~~GWP factor~~* ~~from a single EPD or LCA for the~~ *~~comparable product types~~* ~~is available but is not specific to the product being assessed, the~~ *~~benchmark~~**~~GWP factor~~* ~~shall be 1.2 times greater than the declared~~ *~~GWP factor~~* ~~in the single EPD or LCA. For carbon storage values, no multiplier shall be applied.~~

### Quantification of Uncertainty of GWP *Factors*

### No uncertainty factors shall be applied to *GWP factors* from any data source used in calculations.

### ~~Biogenic Carbon~~

### *~~Biogenic carbon~~* ~~flows shall be calculated in accordance with Section 6 and reported for~~ *~~LCA~~* ~~modules A1-A3 only.~~

### ~~Carbonation~~

### ~~Sequestered carbon from the process of carbonation shall be calculated in accordance with Section 6 and reported for LCA modules A1-A3 only.~~

### Reused Materials

For *reused materials* installed in ~~assembled into~~ the *assessed home*, a *GWP factor* of 0 (zero) shall be assumed ~~for any reused products~~. Quantities for *reused materials* shall be included in reports according to Section 8.2.