**Comment/Explanation\*:***Include your justification for your proposed change to the draft standard below.*  
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The Carbon Leadership Forum (CLF) recommends reviewing the refrigerant emissions factor assumptions in light of the recent EPA regulations coming into effect: <https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-84/subpart-B/section-84.54>

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

**Proposed Change to the Draft Standard\*:**

GWPRF= refrigerant emission factor (kg CO2e/kg); assume ~~2,088~~ 700 kg CO2e/kg for R410a and 675 kg CO2e/kg for R32.