**Comment/Explanation\*:***Include your justification for your proposed change to the draft standard below.*  
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In this draft, changes have been made to make net carbon calculations optional (e.g., including carbon storage together with gross embodied carbon of a building). Yet, the carbon storage of materials is still required to be reported. To be consistent, reporting carbon storage also should be an optional requirement. Also, some bio-based materials or materials with bio-based content may or may not report this in their EPDs and also may not be reported in consistent fashion. Not all PCRs account for reporting carbon storage. For these reasons, both carbon storage and net emissions calculations should be at most optional. Alternatively, both should be striken from the standard for the above reasons and also reasons submitted by other commenters.

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

6.2.2 Carbon storage for products (Optional)

*In section 10.6 (Sample Report), revise sample results table 2nd to last column heading to read:*

Optional:

Carbon

Storage

(kg CO2e)

*NOTE TO COMMITTEE: There may need to be additional coordinating changes to the standard to fully execute the above changes.*