**Comment/Explanation\*:***Include your justification for your proposed change to the draft standard below.*  
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We support the decision in the draft standard to retain **Net Embodied Carbon** and **Net Embodied Carbon Intensity** as optional metrics.

Including net results alongside gross emissions and carbon storage provides practitioners and policymakers with a **more complete picture** of material impacts. While we acknowledge that biogenic flows beyond A1–A3 are not yet captured in this version of the standard, presenting net values transparently — and clearly labeled as optional and “for informative purposes only” — ensures that users can see the relative influence of storage without obscuring gross results.

* **Consistency**: Gross results remain the primary required metric, ensuring comparability and alignment with existing policies.
* **Transparency**: Net results are available for those seeking to understand the role of carbon-storing products, without creating confusion about their status.
* **Future-readiness**: As methods for handling end-of-life emissions mature, the presence of net metrics today helps prepare the market for more comprehensive accounting in future versions of the standard.

We believe this dual reporting framework enhances the standard’s usability and integrity, while supporting innovation in low- and negative-carbon building products.

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