**Comment/Explanation\*:***Include your justification for your proposed change to the draft standard below.*  
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Reporting of biogenic carbon storage should be optional. Data sources on carbon storage are not consistently reported in EPDs and may be difficult to obtain, if required. Making this an optional calculation is appropriate until PCRs start to require reporting the data.

The Waste Factor was not defined, please include in the “Where.”

**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~~3.4 Optional Carbon storage for products

Optional reporting for carbon storage for each *Minimum Assessed Product* that includes *biogenic carbon* as per Section 5.3.5 and carbonation as per Section 5.3.6 shall be calculated as follows:

**CSproduct = (Material Quantity – Waste Factor) x GWPbiogenic**

Where:

CSproduct = Carbon storage for a project-specific quantity of a *building product* for life cycle modules A1-A3 (kg CO2)

Material Quantity = Total quantity of product calculated as per Tables 10.1.1 and 10.1.5

Waste Factor = product waste factor percentage from Table 10.2.1.

GWPbiogenic = *Biogenic carbon* or carbonation associated with a *building product* for life cycle modules A1-A3 based on a data source selected according to Table 5.3.2. If the relevant data source does not include a GWPbiogenic factor, the GWPbiogenic factor shall be calculated as follows:

**GWPbiogenic = Material Quantity (mass) x Carbon Content x 3.67**

Where:

GWPbiogenic = Mass of atmospheric *carbon dioxide* stored in the product

Material Quantity = Mass of product calculated as per Tables 10.1.1 and 10.1.5

Carbon Content = Percentage of product mass represented by carbon content x Carbon content of feedstock material

3.67 = Molar mass conversion factor from carbon content to CO2 content