



World Business Council for Sustainable Development



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The Greenhouse Gas Protocol

Product Life Cycle Accounting and Reporting Standard

Comment Template

We are providing this template to streamline public comment submissions. To use this template, please follow the instructions below:

- The Product draft is open for stakeholder comment from November 11, 2009 through December 21, 2009.
- To provide written comments, please use the comment template provided, instead of sending comments in a separate file or e-mail, in order to streamline the comment process.
- When using the comment template, please organize comments by chapter/section and reference page numbers and line numbers.
- If you have questions during the public comment process, please email Holly Lahd at hlahd@wri.org.
- Submit comments as an attached MS Word file by email to Holly Lahd at hlahd@wri.org no later than **Monday, December 21st, 2009**. We appreciate any effort to submit written comments before the deadline.

Feedback from (name): Edie Sonne Hall

Organization: Weyerhaeuser Company

Chapter/Section	Comments
1. Introduction	•
2. Principles of Product GHG Accounting	•
3. Performing a Product GHG Inventory	•
4. Establishing the Methodology	•
5. Defining the Functional Unit	•
6. Boundary Setting	<ul style="list-style-type: none"> • 6.3.1 Land Use and Land Use Change- see Appendix B comments. • 6.3.4 Intermediate Products- line 49-50. There are many products that fall into this category of being “intermediate” but may be sold to



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	<p>distributors for retail. For example, would lumber be considered an intermediate product? Although there are statistics that show the percentage of end-uses for lumber (e.g. single family homes, multi-family homes, remodeling, furniture, pallets) the reality is that within each of these end-use categories there is tremendous variability in terms of emissions for the use phase. A consumer purchasing a 2x4 at a home improvement store would not be interested in calculating emissions from use and end-of-life, but a large builder might be interested as the way of building the house determines affects the use-phase emissions (of the house). We recommend the determination of “intermediate product” be given to the reporting company as long as they can provide suitable justification.</p> <ul style="list-style-type: none"> • Section 6.3.6 Background Processes, Corporate Activities and Services, Research and Development (pg 33, line 15). We do not feel it is appropriate to attribute Research and Development emissions to each product under “background processes”. This is a disincentive for active R&D to create innovate products and would be biased against new products. It also would be very difficult to assess as for every product that gets commercialized there are several hundred that do not. R&D is also already accounted for under the Corporate GHG Protocol. • Section 6.3.6. Background Processes, Capital Goods, (p 33, line 19). Unless there are sector specific simple tools developed, we recommend that NO capital goods be required except those that are listed as Significant in Table 6.1 (pg. 34). It is simply too unwieldy just to undergo the “screening process” to determine significance/insignificance for capital goods in all the facilities a company has to make a product.
7. Collecting Data	<ul style="list-style-type: none"> • Throughout chapter 7 many sections are labeled as chapter 8. These should be changed. • On page 40, in Box 7-2 “Tips for Using Emission Factors”, should add the following bullet item at the end “Document when emission factors or other factors (e.g. GWP) have changed (i.e. time stamp changes). It is important to be able to recreate old values using old factors (e.g. this will enhance the transparency of all of the reported data). • 8.2.5 Complex and Complicated Products, pg 44, line 38. In addition to changing to 7.2.5, we would like to emphasize that there will be an enormous amount of products that fall into the category of complex or complicated. Without sector specific guidance it will be very difficult for a company to comply with this protocol. We urge WRI/WBCSD to help review and facilitate the acceptance of these protocols. The National Council on Air and Stream Improvement has developed a carbon footprint tool for the International Finance Corporation called “the Forest Industry Carbon Assessment Tool (FICAT)”, which we would like that to be considered for acceptance as the forest sector tool. It is available for download at www.FICATModel.org. If Weyerhaeuser is accepted as a road-tester we would like to road-test this model and NCASI has agreed to work with us to help the road-testing.
8. Allocation	<ul style="list-style-type: none"> • On page 59, section 9.2.1 “Why undertake a data quality assessment?” should add the following bullet item at the end “Provides the basis for the overall accuracy of all reported values”.
9. Assessing Data Quality & Uncertainty Analysis	<ul style="list-style-type: none"> •



10. Calculating GHG Emissions	<ul style="list-style-type: none"> •
11. Assurance	<ul style="list-style-type: none"> •
12. Reporting	<ul style="list-style-type: none"> • Summary, p. 91. Wood product carbon storage. Although there were verbal assurances at the stakeholder workshop (Dec. 1, 2009, Washington, DC) that wood product carbon storage would be accounted for, there is no reference to carbon storage in the draft standard except for on page 91 in the summary table. There should be specific guidance on how to account for wood product storage and what stage the storage is credited. For example, it might be appropriate to credit carbon storage (discounted out 100 years to only account for long-lived storage) in the production or use phase instead of the end-of-life stage. The National Council on Air and Stream Improvement can provide guidance for how wood product carbon storage is credited.
Appendix A: Data Management Plan	<p>On page 94, line 25 “At a minimum the data management plans should contain”, add the following bullet items:</p> <ul style="list-style-type: none"> • Primary contact person’s contact information. • List data not collected (e.g. de minimis sources) • List calculation assumptions (e.g. conversion factors) • The data management plan should be reviewed at least annually
Appendix B: Additional Guidance on Collecting and Calculating Data	<p>Appendix B, pg 99, line 3; pg 101 lines 13. In two instances you refer to “land use and land use change” or “land use” emissions. However, the calculations appear to only apply to instances of “land-use change”. We believe that land-use change is the only category that should be assessed as it can be assumed that carbon stocks are replaced in the instance of land-use (e.g. a crop or forest is replanted). If we are correct in the interpretation that this protocol only requires assessment of “land-use change” emissions, then “land use emissions” should be deleted from the lines referenced above.</p> <p>Pg 99, line 12. You should use the numbers from the IPCC Fourth Assessment Report (Denman, K.L., G. Brasseur, A. Chidthaisong, P. Ciais, P.M. Cox, R.E. Dickinson, D. Hauglustaine, C. Heinze, E. Holland, D. Jacob, U. Lohmann, S. Ramachandran, P.L. da Silva Dias, S.C. Wofsy and X. Zhang, 2007: Couplings Between Changes in the Climate System and Biogeochemistry. In: <i>Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change</i>), Section 7.3.1 Table 7.2. Houghton is just one study, and the IPCC synthesized number is 1.6 Pg C (not 2Pg C). Incidentally, this is total net carbon emission associated with land-use change not total net land-atmosphere flux. The net land-atmosphere flux is reported as a net sink on the order of -1Pg C (see Table 7.1).</p>
Appendix E: Glossary	<ul style="list-style-type: none"> •
Any other general comments or feedback	<ul style="list-style-type: none"> • As stated in the comments in section 12, there should be specific guidance on how to account for wood product storage and what stage the storage is credited. For example, it might be appropriate to credit carbon storage (discounted out 100 years to only account for long-lived storage) in the production or use phase instead of the end-of-life stage. The National Council on Air and Stream Improvement can provide guidance for how wood product carbon storage is credited.

