



World Business Council for Sustainable Development



WORLD RESOURCES INSTITUTE

## 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](mailto:hlahd@wri.org).
- Submit comments as an attached MS Word file by email to Holly Lahd at [hlahd@wri.org](mailto:hlahd@wri.org) no later than **Monday, December 21st, 2009**. We appreciate any effort to submit written comments before the deadline.

**Feedback from (name):**  Tony Siantonas

**Organization:**  dcarbon8 Ltd

Chapter/Section	Comments
The outline and overall structure of the document	•
1. Introduction	•
2. Principles of Product GHG Accounting	•
3. Overview of Product GHG Accounting	•
4. Establishing the Methodology	•
5. Defining the Functional Unit	•



6. Boundary Setting	•
7. Collecting Data	<p>Regarding data collection requirement to calculate all direct carbon data relevant to the product from primary data:</p> <ul style="list-style-type: none"> <li>• Suggest this is strengthened by a quantified requirement for at least 10% of cradle to gate emissions to be collected via primary data, as in PAS 2050. This ensures that mid-level suppliers and traders (whose direct emissions represent a very small % of total lifecycle carbon impacts) do not simply use secondary database information as part of their product LCAs. Since reductions should be the primary aim, a significant amount of primary data is essential to ensure a representative, accurate baseline used to demonstrate reductions</li> </ul>
8. Allocation	•
9. Assessing Data Quality and Uncertainty	•
10. Calculating GHG Emissions	•
11. Assurance	•
12. Reporting	<ul style="list-style-type: none"> <li>• Agree strongly with the need to disclose all lifecycle data. Suggest the inclusion of a section detailing the secondary data sources used to ensure best practice calculations.</li> </ul>
Appendix A: Data Management Plan	•
Appendix B: Additional Guidance on Collecting and Calculating Data	•
Appendix E: Glossary	•
Any other general comments or feedback	<ul style="list-style-type: none"> <li>• REDUCTIONS. Although this section on reductions guidance has been excluded. Moreover, there is no mention of the requirement for a company to produce a statement on how lifecycle emissions are being reduced. This should form part of the final public disclosure.</li> </ul>

