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.
- 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):____**Niels Jungbluth**_____

Organization: _____ESU-services Ltd._____

Chapter/Section	**Comments**
Summary	• 3.4. Allocation Order. Please move 4th bullet point (To avoid ….) to second after (when addressing) • Allocation by substitution. Delete this possibility. It is not inline with the attributional modeling principle that is used all over the standard. This approach is allowed according to ISO 14040, but it follows consequential thinking. It is quite difficult to apply because substitute products should be the same for all producers. Allowing this possibility would lead to unstable results. • Allocation based on market value Delete the last part of the last sentence. This requirement is not necessary. Economic allocation can be applied if there is an average price available for the reporting period. The price does not need to be

Chapter/Section	Comments
	stable within the period (because it can be averaged) nor beyond this period (because this is not of interest). • 3.8. /Inventory Date Instead of the date there should be a reference time frame for which data have been investigated. It would be interesting to include a split up of the greenhouse gasses inventoried in this summary report. • The title “Product Life Cycle Accounting and Reporting Standard” is misleading, because the standard deals only with one impact category. Please write: “Product Life Cycle GHG Accounting and Reporting Standard”
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	•
7. Collecting Data	•
8. Allocation	• 8.1. There is an inconsistency if one the one side you say couple products should have an economic value and on the other side recycling is mentioned as an example. It should be clearly stated that for many recycling processes inputs do not have an economic value (e.g. glass, paper, small scrap of metals) and thus no allocation is necessary. • Tab. 8.1. The description on physical allocation factors in this table and the “allocation based on physical relationship” on P. 52 do not match. I would suggest to distinguish two principles • “Process sub-division by physical relationship” (similar to description in tab 8.1). If there is a clear physical relationship and product volumes can be varied independently, allocation is not necessary and instead sub-division of the process is possible. • “Allocation based on physical relationships”. It is not possible to vary product volumes independently. But, one can apply physical units as e.g. energy content or mass in order to derive allocation factors. • Substitution. In my point of view this is not attributional, but consequential and should be deleted because the standard aims to follow an attributional way of modeling. • Additionally in most cases this will overestimate emissions because a couple process is more efficient than two stand alone processes. E.g. heat and electricity from fossil fuel can be generated separately, but a combined plant will provide more. Thus, if substitution is used, emissions added for the single products will be lower than the real emissions. This is in conflict with the accounting principle of covering the emissions as they are.

Chapter/Section	Comments
	• Value Choice. Please delete this part because overlaps with above parts. All approaches are somehow a value choice. • Fig. 8-4 Rename “Use physical allocation factors” to “use process sub-division by physical relationship” Delete the box “Are the market values ….”, which is not necessary. In any case one can apply the average values over the reporting period. • P. 55, L. 49ff Substitution Delete the paragraph because consequential approach that should not be followed in this standard. • P. 56 “De facto closed loop recycling” This is a quite strange description and should be deleted. It would be a consequential type of modeling to include such assumption on “de-facto”. The description is related to the avoided burden approach and thus does not make sense if the attributional modeling principle is applied. It is also inconsistent with the prerequisite of an economic value for the product after the use phase. If it remains in the report it should be renamed in order to reflect the forecasting and consequential nature of this approach.
9. Assessing Data Quality & Uncertainty Analysis	•
10. Calculating GHG Emissions	•
11. Assurance	•
12. Reporting	•
Appendix A: Data Management Plan	•
Appendix B: Additional Guidance on Collecting and Calculating Data	•
Appendix E: Glossary	•
Any other general comments or feedback	•