



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): _____ **Hemant Bundele** _____

Organization: _____ **ibLaunch Energy, Inc.** _____

Chapter/Section	Comments
The outline and overall structure of the document	•
1. Introduction	<ul style="list-style-type: none"> • Page #6, line # 18 It's good that "shall", "should" & "may" are defined clearly. • Page #7, line 6 As mentioned the goal of product standard is "public disclosure", that means product comparison specially focused on GHG inventories are bound to happen. This comparison can't be avoided once the information is out in the public domain. Hence better guidance on product comparison needs to be provided; this should be clear and needs to be on the forefront of this standard.
2. Principles of Product GHG Accounting	•



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3. Overview of Product GHG Accounting	•
4. Establishing the Methodology	• As this standard is based on an attributional approach to product GHG accounting, lot of discussion related to consequential approach in chapter 4 can be moved to appendix. In fact this chapter itself can be merged into “Overview of product GHG accounting”.
5. Defining the Functional Unit	•
6. Boundary Setting	•
7. Collecting Data	•
8. Allocation	• Page #53, line 12 It say's “This standard identifies six valid methods for allocating emissions..” I think it can be revised to “This standard identifies two methods for how to avoid allocation and four methods for allocating emissions...”
9. Assessing Data Quality and Uncertainty	•
10. Calculating GHG Emissions	•
11. Assurance	• Current requirement on assurance are not stringent enough – our recommendation is to make external third party assurance mandatory after 3 years of initial determination of product emissions, allowing companies to mature their own processes related to data collection.
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	• Protocol is complex in terms of implementation. Need for more simplicity to implement.

