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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): Dr. Dorothy Maxwell (GVSS- technical advisors to Defra)

Organization: UK - Department for Environment Food and Rural Affairs (Defra)

Chapter/Section	Comments
The outline and overall structure of the document	<ul style="list-style-type: none"> • Overall, the Standard is well written, incorporates the correct technical content in line with current accepted knowledge and suitable for a Carbon Footprint (CF) generic standard. • Comments are only included in sections below where suggestions for changes are being made.
1. Introduction	<ul style="list-style-type: none"> • P.9, 1.3.1 Business Goals – The application of the Standard is clearly described in this section i.e. for use in CF measuring, performance tracking, product differentiation and supply chain management. This is fine. However when you read Section 12 ‘Reporting’ - which requires a report to be completed as a deliverable - you could misunderstand that this standard was only aimed at reporting your CF as per the Scope 3 Reporting Standard. Section 12.2 ‘Guidance’ p. 86 is clear that the report is on the CF measurement etc. and reductions/management implemented as a



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	<p>result. Table 12.3, p.87 is a good example of this. Suggest that all that is needed is to clarify up front in Section 1 the role of the report vs the application, to avoid this potential confusion.</p> <ul style="list-style-type: none"> Defra’s separate comments on Section 1.6.2. of Scope 3 Standard also apply here viz: [Section 1.6.2] reporting requirements - requires all six Kyoto Protocol GHGs to be reported separately. The UK Government has produced GHG reporting guidance based on the GHG Protocol Corporate Reporting Standard and found, during extensive public consultation of our draft, that the recommendation of reporting the six gases separately was particularly unpopular. In the main, respondents to the Defra consultation stated that the reporting of separate gases should occur where the gases are material to the reporting organisation, perhaps using a significance threshold to determine this. The UK Government guidance does not recommend reporting the six gases separately, but that the gases are reported as a CO₂e figure.
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	•
8. Allocation	<ul style="list-style-type: none"> P. 53, 8.3 Guidance – Suggest a reference is included to the recommended allocation method in the PCR for the product group as this will narrow the options for users.
9. Assessing Data Quality and Uncertainty	•
10. Calculating GHG Emissions	•
11. Assurance	<ul style="list-style-type: none"> See comment under 1 The role of the current assurance arrangements and whether they are likely to provide enough of a driver for CF uptake needs further consideration.
12. Reporting	<ul style="list-style-type: none"> See comment under 1 p. 82, 12.0 Reporting – Suggest that the reporting requirements include the baseline year to enable comparisons of emissions over time and progress towards targets to be made. p. 87 – Having 2 reports – a Summary and a Technical as proposed – is likely to be unnecessarily onerous for companies and put them off. Suggest 1 report with 2 parts would be less of an administrative burden.
Appendix A: Data Management Plan	<ul style="list-style-type: none"> As the Data Management Plan is new to existing LCA approaches and software in general, this may be seen as an added administrative burden for companies beyond the normal GHG inventory. Online spreadsheet templates for industry to use for their data



	management plan would facilitate usage as companies get used to this.
Appendix B: Additional Guidance on Collecting and Calculating Data	<ul style="list-style-type: none"> •
Appendix E: Glossary	<ul style="list-style-type: none"> •
Any other general comments or feedback	<ul style="list-style-type: none"> • To enable greater uptake in business of this standard, product group specific tools will be needed, in particular for those sectors new to CF. These include Product Category Rules (PCRs), Carbon Footprint software and secondary databases. While it is not part of the scope of this Standard to develop these, suggest clarifying that this is a need and providing a facilitation forum to get parties e.g. companies, industry associations and providers together as a parallel or follow up exercise to the Standard .

