



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): __ Javier Fajardo

Organization: __ U.S. Department of Agriculture, Foreign Agricultural Service (USDA/FAS)

Chapter/Section	Comments
The outline and overall structure of the document	The United States Department of agriculture (hereafter USDA) appreciates the opportunity to comment on the draft proposal of the “Product Life Cycle Accounting and Reporting Standard” of the World Resources Institute (WRI). USDA recognizes the voluntary nature of this private standard. The USDA would like to make the following comments, and we reserve the opportunity to continue reviewing the proposed standard and submit further comments at a later time.
1. Introduction	According to section 1.3. on “who should use this standard”, this section will be developed further. Will WRI provide a second comment period to stakeholders for the review of new additions/modifications to the proposal?



World Business Council for Sustainable Development



WORLD RESOURCES INSTITUTE

2. Principles of Product GHG Accounting	•
3. Overview of Product GHG Accounting	•
4. Establishing the Methodology	•
5. Defining the Functional Unit	•
6. Boundary Setting	<p>We are interested to know more about land use and land use change, and the guidance on collecting and calculating data on land use and land use change. According to Appendix B, these sections are still under review by the technical working group. Will WRI provide a second comment period to stakeholders for the review of sections 6.3.1 and Appendix B of the proposal once drafting is completed?</p>
7. Collecting Data	<p>According to section 7.1., primary data includes activity data, emission factors, or direct emission measurements for a specific process related to a specific product manufactured by the reporting company or a company in its supply chain. We offer the following comment related to section 7.1:</p> <p>(a) We consider that the collection of primary data would be burdensome for some companies in the agricultural and food industry sector that are vertically integrated (e.g. companies that have both agricultural and manufacturing processes under their financial or operational control).</p> <p>Would WRI please explain what is the rationale for requiring primary data collection for all processes under the financial control or operational control (as defined by the GHG Protocol Corporate Standard) of the company undertaking the product inventory in the case of agricultural and food industry sectors?</p> <p>b) We recognize as important the collection of primary data, which will allow companies to provide a credible outcome. However, the onerous process of primary data collection would initially have a bigger impact on small and medium agricultural and food industry firms. Has WRI considered establishing a flexible implementation period beyond the “road testing”, where companies are allowed to use other types of data and still be in conformance with the GHG Protocol Standard?</p>
8. Allocation	•
9. Assessing Data Quality and Uncertainty	•
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	<u>Section 13</u> on Accounting for GHG Emission Reductions is to be completed. Will WRI provide a second comment period to stakeholders for the review of this section once drafting is completed?

