



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): _____ Verena Radulovic _____

Organization: _____ US EPA Climate Leaders _____

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	We agree with the following statement in Section 6: “In some cases, the use of end-of-life stages of a product may not be reasonably assumed. For these products, a partial inventory (cradle-to-gate) may be performed. End-of-life recycling shall not be included in a partial inventory.” We support performing full life cycle GHG inventories (cradle-to-grave) when it is clear that products are recovered at end of life. In cases where the lifespan of the product is short and companies can attest to the product’s recycling, the information should be included. However, in many cases the lifespan of a product is much longer and it is difficult to assess whether or not it will be recycled (or if the product it may be replacing has similar properties).
7. Collecting Data	•
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	•

