Program Operator Consortium / Technical Advisory Board response to USGBC guidance – 11/18/2016

Response to USGBC objectives and intent

The Program Operator Consortium (POC) and its Technical Advisory Board (TAB) have reviewed the Part A Enhancement and Part B Guidance and found that the USGBC's and POC's objectives and intent are aligned. The POC has also been addressing many of these goals and is looking forward to working with USGBC towards achieving the others.

Objective	Response
Provide more tailored PCR guidance for manufacturers of building products	Our objectives are aligned; the POC is also doing this.
Establish PCRs used to produce Environmental Product Declarations (EPDs) that are more aligned with USGBCs market transformation goals	Our objectives are aligned; the POC will continue to evolve its program to support the USGBC's market transformation goals.

Intent	Response
Incorporate industry wide benchmarking guidance into PCRs	Our intents are aligned; the TAB will review how benchmarking can be incorporated into Part A 2017.
Improve the overall quality of transparency in the supply chain for building products	Our intents are aligned; the POC will work with you to do this.
Increase the volume of product-specific EPDs for building products	Our intents are aligned; the POC believes that making EPDs easier to understand will increase the volume of EPDs in the marketplace.
Improve data and methodology transparency in EPDs to enable project teams to more effectively compare environmental attributes between products, assemblies and industry baselines	Our intents are aligned; the POC will work with you to do this.
Catalyze the development of tools for designers and manufacturers based on information contained in EPDs	Our intents are aligned; members of the POC are creating and catalyzing the development of tools for designers and manufacturers, such as the Transparency Catalog. Data from cloud-based EPDs and tools can be leveraged by manufacturers for use in other tools.

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We are delivering on the objectives and intent above by aligning to provide simpler, standardized and more useful solutions to promote the overall use of PCRs, LCAs and EPDs in the marketplace. The POC has aligned around one common set of general LCA calculation rules and reporting requirements. That program is maintained by the Technical Advisory Board, which is made up of LCA experts, industry representatives with LCA expertise, and program operators with LCA/EPD expertise. ***Each POC member has a representative on the TAB***. http://programoperators.org/technical-advisory-board-tab/

We are advocates of transparency, inclusion and collaboration. To that end, the POC will be making public this review of the guidance document.

Comments on Part A Enhancement and Part B Guidance

- The POC represents six major program operators in North America. It is not an exclusive organization. Any program operator operating according to ISO 14025 can become a member. There is no cost.
- All POC members have agreed to align around a common PCR Part A for North America, and to support its ongoing maintenance and evolution.
- Part A is updated annually to align with market evolution, such as with new international standards and rating systems – the TAB is currently preparing Part A 2017.
- The TAB is a persistent group of **13** highly skilled LCA and technical professionals representing all POC members, manufacturers, and LCA consultants.

The following summarizes our feedback and comments to the guidance:

1. **The POC and its affiliate members and customers find it unacceptable for USGBC produce this guidance in partnership with a single for-profit program and exclude other major programs, thereby endorsing one provider over all others.** To be compliant with the guidance, USGBC is requiring the use of UL Environment's program (required in sections 5.1 and 7; encouraged in section 1.3). This exclusive nature will have the effect of creating a market monopoly and stifling innovation in a continually evolving field of environmental transparency. **If it is intended as an 'overlay' to a program, then it should be written to be an overlay to *ANY* program.** Further, the USGBC Technical Advisory Panel has representatives from only one active program operator, which is insufficient to represent the industry.

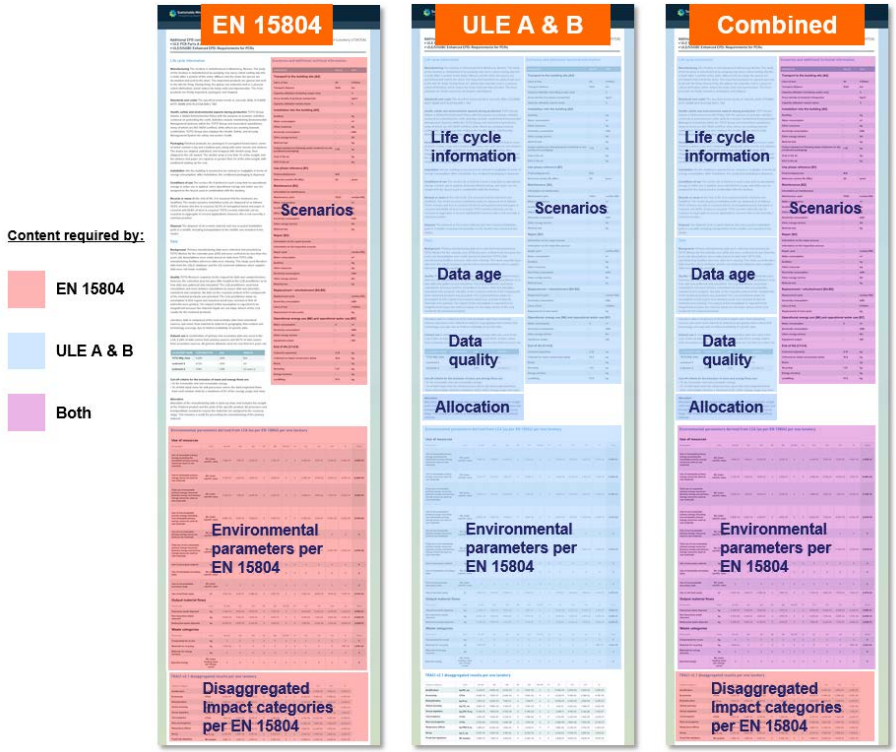
2. **The Part B Guidance does not contain any guidance.** This document contains a Part B template and EPD template, which the Part A guidance requires be used for Part B and EPD development. USGBC should not require that other program operators use this specific format for creating Part Bs, as it endorses one provider's approach over all others. USGBC should not require that other program operators use this specific EPD template. Each program operator has their own branding standards and recognizing a single EPD template would stifle important market innovations that have been developed to present meaningful environmental transparency in a shorter, easy-to-understand, and aesthetically pleasing manner. Those other approaches should be considered in your process. The POC recommends that USGBC write the Part B Guidance as specific information requirements without prescribing a format, so that any program operator can use its own format for both Part B and EPD creation. (If the intent is to align with the ACLCA Guidance for PCR Development v1.0, USGBC should refer to that in said guidance.)

3. **EPDs are used differently by industry and region, and not always in alignment with the objectives and intent as USGBC.** For example, European EPD results are used to demonstrate compliance with regulations. In North America, the intent for EPDs of building products is to help building professionals make better informed decisions about the products they put in their buildings. *Different kinds of information are required for these different purposes.* USGBC separates guidance for North America from guidance for other regions for impact assessment methods; therefore, the POC recommends that USGBC provide separate guidance for European EPD requirements, such as the reporting of cut-off criteria and environmental parameters in the EPD (see the full list of comments for more detail). This way, EPDs can maintain a similar format for multiple purposes.

4. **The content requirements for a Type III environmental declaration should be based on supporting users' needs.** The USGBC's objectives are aligned with the goals of ISO 14025 to *"encourage the demand for, and supply of, those products that cause less stress on the environment, through communication of verifiable and accurate information that is not misleading, thereby stimulating the potential for market-driven continuous environmental improvement."* A common criticism of existing EPDs is that they are too long with unnecessary and irrelevant information presented. This USGBC guidance is arbitrarily cementing such unnecessary presentation of environmental results by mandating the inclusion of content that is not universally useful or relevant for a broad audience. ISO 14025 says in the introduction: *"It is important to **consider the information needs** of different purchaser or user groups…Those responsible for developing Type III environmental declarations and programmes …will need to **pay due attention to the level of awareness of the target audience**."* USGBC's guidance is in conflict with this principle and in conflict with alternative market innovations which present the most meaningful and transparent results in a compact, easy-to-understand, and consistent manner. EPDs developed under POC Part A specifically align with USGBC's intent to increase the volume of EPDs and to catalyze the development of tools, but it appears such reports would not be acceptable under USGBC's draft guidance. USGBC should eliminate such prescriptive formatting and provide guidance only on specific data elements (which are universally meaningful and necessary for transparency) to be required in an EPD. An EPD can be developed for any PCR without diluting the core content and consistent format, as shown in the example below.

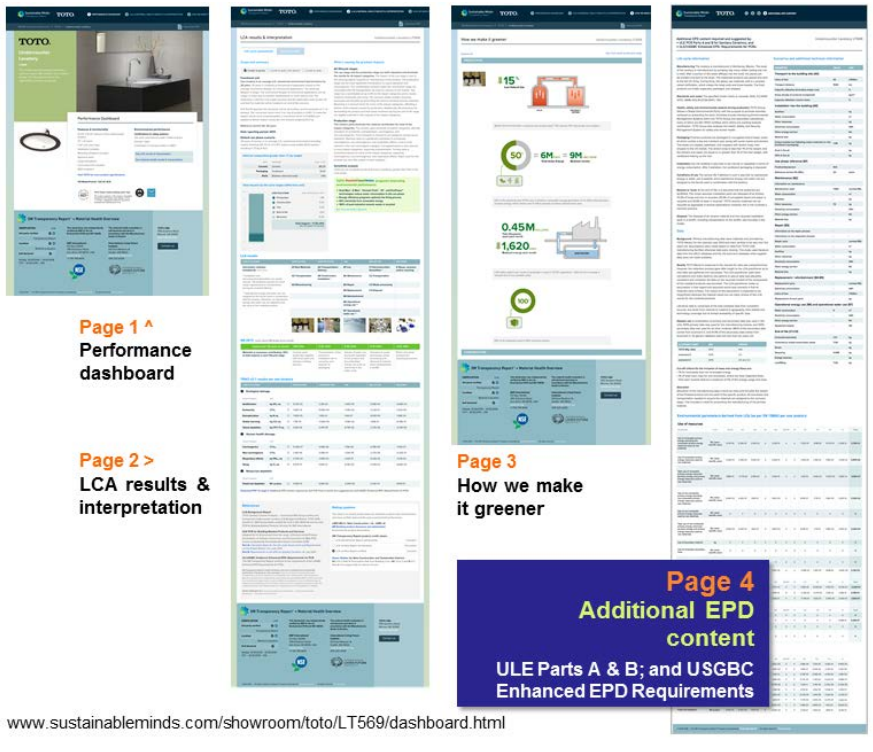
Example: Examining content requirements from EN 15804 and ULE Parts A&B. The POC Part A Compatibility Appendices identify EPD content required by a PCR that do not pass the test of either reporting and/or understanding the **environmental impacts** and/or how the manufacturing is making environmental performance improvements. Maintaining the commitment to concise reports, additional EPD content is published on a separate page (or pages) when conformance to additional standards or PCRs is necessary. This extraneous content is illustrated both as a detailed example (Figure 1) and an actual EPD (Figure 2). This additional amount of content places a tax on all involved – *more work for the LCA provider, more work for verifiers, more cost for manufacturers, and not understandable by AECs.*

Figure 1. Amount of required additional content from indicated compatibility appendices



This **example** illustrates the burdensome amount of additional content required in an EPD to be compliant with both UL Environment's PCR Parts A and B for Sanitary Ceramics and CEN EN 15804:2012+A1.

Figure 2. Actual EPD using ULE PCR Part A & Part B for Sanitary Ceramics + USGBC preliminary guidance – published 01/16/2016



This **actual** SM Transparency Report for TOTO's Undercounter Lavatory LT569 is compliant with UL Environment's PCR Parts A and B for Sanitary Ceramics and USGBC's preliminary enhanced EPD guidance.
Download the PDF to review Page 4.

POC recommendations:

1. **Write the Part A Enhancement to apply to all Part As, so that it is not required to use the Part A of any one specific program operator.**
2. **Write the Part B Guidance as specific information requirements without prescribing a format, so that any program operator can use its own format for both Part Bs and EPDs. Refer to SM Part B and POC Part A Appendix C as examples for how to list requirements for Part Bs and EPDs.**
3. **Separate guidance by region in sections where it is appropriate.**
4. **We invite USGBC to participate on the POC TAB; or conversely have several POC members join the USGBC TAP.**

Specific comments on the guidance are separated into four tables:

1. **Requirements POC disagrees with**
2. **Items the TAB is discussing that may be enhancements to the POC Part A**
3. **Editorial comments**
4. **Comments on the Part B Guidance**

We request that USGBC respond to this submission, including all proposed changes. A response justifying a position should explain *how* it helps a manufacturer improve the manufacture of their products and/or how it helps a specifier make an informed decision.

Table 1. Part A Enhancement requirements POC disagrees with

#	Page	Section	Comment type	Guidance text	Comment	Proposed change
1	1	Exec summ	General	The enhanced EPD guidance was developed with input from a Technical Advisory Panel (TAP) comprised of LCA experts, product manufacturers, and program operators.	There is only one active program operator being represented on the TAP.	Add a representative(s) to the POC TAB, or add more program operator representation to the TAP. The feedback presented in these comments is from the POC TAB.
2	4, others	1.3, others	Technical	EN 15084 has been identified by the USGBC Technical Advisory Panel as the most robust and progressive standard at the time of writings and as such, has been selected as the first document to receive an overlay based on the in-process update being conducted on ISO 21930. […] USGBC prefers to reference international standards when they exist and thus will update this overall to ISO 21930 once it has completed the revision process, expected in the coming years.	While EN 15804 and ISO 21930 are robust standards, they apply to EPDs which are being produced and used in other parts of the world. EPDs are being used differently in other parts of the world than they are in North America. These differences extend beyond regional differences in conducting LCAs. For example, European EPD results are used for regulatory reporting. In North America, EPDs are being used as tools for manufacturers to promote product transparency and for customers to select environmentally preferable products, for which much of the information required in EN15804 and ISO 21930 is excessive and unnecessary. For impact assessment methods, USGBC separates guidance for North America vs other regions, so they should also generally separate guidance by region for other sections, or provide “core guidance” for universally required information and “regional supplemental guidance” for regionally relevant information.	Separate guidance for North America vs other regions, which we later address in these comments. Alternatively, move Europe-specific and North America-specific guidance to supplemental region-specific guidance.
3	5	1.3	General	PCRs developed in North America are encouraged to follow the UL Environment/IBU Core PCR: Part A when developing PCRs for the enhanced EPD requirements	USGBC’s explicit endorsement of a single for-profit program over other programs will stifle ongoing innovation in product transparency. The market should have a choice to evaluate and reward such innovations. Instead, USGBC should specify	Delete this sentence.

					specific requirements independent of any single program.	
4	5	1.6	General	USGBC has maintained and continues to develop partnerships with program operators	It currently appears that USGBC only has a partnership with UL Environment and not any other program operator.	Make clear that USGBC has developed a partnership with only one program operator up to this point.
5	7	1.10	Technical	Toxicity impacts are explicitly excluded on the basis of characterization factor imprecision to the order of 100-1,000, ultimately causing incomparability of results.	No impact categories should be explicitly excluded; their inclusion in TRACI and other methods is an indication by experts that they have merit. However, because of the known uncertainty surrounding toxicity, it should only be optionally reported as additional environmental information.	Allow toxicity impacts to only be optionally reported as additional environmental information.
6	7, 12	1.10, 6.3	Technical	The following impact categories at a minimum shall be reported: • Global warming potential • Ozone depletion potential (stratospheric) • Acidification potential (land and water) • Eutrophication potential • Photochemical oxidant creation potential • Abiotic resource depletion of nonrenewable (fossil) energy resources	Because of the known uncertainty surrounding Abiotic resource depletion of nonrenewable (fossil) energy resources, it should only be optionally reported as additional environmental information.	Allow fossil fuel depletion impacts to only be optionally reported as additional environmental information.
7	8	1.11	Technical	PCRs developed according to this guidance shall not include quantitative impact reporting of module D or incorporate avoided burden calculations outside the system boundary.	EN 15804 makes quantitative impact reporting of module D optional, because energy that is part of the supply chain or the product system under study should be accounted for no matter what the source or variety is.	Make quantitative impact reporting of module D optional.
8	8	2.1	General	When developing new PCRs, conformance with EN 15804 and ISO 21930 shall be pursued.	“shall be pursued” requires that PCRs seek conformance, but does not require that PCRs achieve conformance. This is not a meaningful requirement and can’t be effectively verified.	Delete this sentence; specific PCR development guidance according to EN 15804 and ISO 21930 is already specified throughout the guidance.
9	9	5.1	General	A product category-specific PCR Part B shall be developed based on this document and UL Environment North American PCR adaption, ‘Part A: Calculation Rules for the Life Cycle Assessment and Requirements on the Project report’.	This arbitrarily mandates an existing prescriptive format, excludes existing innovation, and stifles future innovation. It is not in USGBC’s interest to stipulate use of one program. A more flexible and inclusive approach would specify requirements without regard to a specific program.	Revise this section to state: “The PCR Part B shall be developed based on the specific requirements contained in the Part B guidance.”
10	10	5.3	General	Industry Wide Benchmarking When a company specific EPD is benchmarked against an industry wide EPD,	It is unclear when it would be appropriate to use industry-wide benchmarking. There should be some cautionary language	Write guidance for how and when industry-wide benchmarking should be done. Consult manufacturers from several industries to

				the following requirements shall be met:	involved with instructions for when and how to use this guidance.	help write this guidance, and describe which types of industries it would be appropriate for (we can help with this if you decide to do so). Require PCRs to specify whether the PCR can be used to develop an industry average – that way, the industry developing the PCR can decide whether it's appropriate or not. If they do, the PCR should clearly state what the assumptions are for constructing that average, including guidance of whether benchmarking can be done by volume, by content, etc. The TAB will consider parts of this section for Part A 2017.
11	10	5.3	Technical	When a company specific EPD is benchmarked against an industry wide EPD, the following requirements shall be met: […] • Software and version of LCA modeling software used shall be consistent between the company specific EPD and the industry wide benchmark EPD. […] • Data sources as specified in Section [error] of the PCR Part B shall be consistent between the company specific EPD and the industry wide benchmark EPD as it pertains to: […] o Background Life Cycle Inventory data sets and reference year o Specific primary, non-Life Cycle Inventory (LCI) data (e.g. transportation distances and modes)	The consistency of software and version between company-specific and industry-wide EPDs, as well as the consistency between data sets and specific LCI data, are not reasonable given the cost and past investments that manufacturers have already made in software and data. The software requirement will inadvertently reduce competition in the LCA software market. The data requirements mean that if a company-specific EPD is made with recently updated data, the industry-wide benchmark would have to be updated, it could not be compared to other EPDs using the outdated data. Instead, this section could require use of the same underlying reference data.	Instead of including this as Part A guidance, require stakeholders to address data sources in each PCR Part B, since the data used will be different for each industry. Delete the requirement to use the same software and version number. Delete requirements to use specific data sets unless they are provided free to those wishing to create comparable results.
12	13	7	Technical	EPDs using this guidance will follow the requirements outlined in […] the UL Environment North American PCR adaptation, "Part A: Calculation Rules for the Life Cycle Assessment and Requirements on the Project report"	This arbitrarily mandates an existing prescriptive format, excludes existing innovation, and stifles future innovation. It is not in USGBC's interest to stipulate use of one program. A more flexible and inclusive approach would specify requirements without regard to a specific program.	Revise this requirement to state: "EPDs shall follow the requirements specified in this guidance."
13	13	7.1	General	The following general information shall be declared [in the EPD]: […] • Range of dataset variability (industry-wide EPDs only; mean, median, and standard deviation)	Depending on the number of participants, reporting the median could disclose what manufacturers may view as proprietary information. No other standard requires this.	Delete the requirement to report the median as a part of reporting the dataset variability.

14	13-14	7.1	General	The following general information shall be declared [in the EPD]: […] • The following statements: […] o "Comparison of the environmental performance of [Product category] using EPD information shall be based on the product's use and impacts at the building level, and therefore EPDs may not be used for comparability purposes when not considering the building energy use phase as instructed under this PCR". o "Full conformance with the PCR for [Product category] allows EPD comparability only when all stages of a ceiling panel life cycle have been considered. However, variations and deviations are possible". […] o If the EPD is company specific, "There may be as much as a 2.5% or more difference in the impacts of a particular product from the results provided in the EPD."	This requires the exact (and verbose) language to be included instead of being able to represent the same ideas using different and simpler text.	Revise the bullet to read, "The following information:" and remove the quotation marks from each sub-bullet. This enables program operators either to use this language as is or to integrate the intent of these statements into existing or new non-comparability statements.
15	14	7.2	Technical	The following general information shall be declared [in the EPD]: […] • Criteria for inclusion of mass and energy flows	EPD users in North America are not looking for modeling information described to this level of detail in an EPD – it is already included in and more appropriate for the LCA background report, which is available upon request.	Delete the requirement for reporting the cut-off criteria in North American EPDs.
16	14	7.3	Technical	• Environmental parameters shall be reported [in the EPD] o Reported parameters shall be declared per EN 15804 Section 7.2, Tables 3, 4, 5 and 6: i. Parameters describing environmental impact ii. Parameters describing resource use iii. Other environmental information describing waste categories iv. Other environmental information describing output flows	Purchasers or specifiers of building products do not need this level of detail in an EPD to make an informed, comparative decision. They do not directly *"encourage the demand for, and supply of, those products that cause less stress on the environment".* Such information should be included and available in the LCA background report so that it can be part of the review process before publication of the EPD. This information is not necessary in the EPD to tell the environmental impact story. **Flow data does not represent impact, and it is already represented in the impacts that *are* reported.** A simple, concise format is best for the target audience and that all LCA results and defining underlying parameters	Delete the requirement to report these environmental parameters universally. Consider adding them to supplemental regional guidance for European EPDs.

					should not be reported in the EPD. See page 2 of the POC compatibility appendices for visual examples of the amount of additional content these requirements generate that get in the way of the content that is actually useful. (All additional EPD content required by the PCR that is NOT included in POC Part A Appendix C will be published on Page 4 in a Transparency Report. Each program operator can determine placement in its EPD template.)	
17	15	7.4	General	EPD summaries shall contain pertinent outcomes of the LCA, a link to the full EPD, and shall also include the following key metrics: […]	EPDs *are* summaries of the pertinent outcomes of the LCA. A "summary EPD" by definition recognizes that there is extraneous information being required in the EPD. Such information should be in the background LCA report, not the EPD. Additionally, there is no mention of EPD summaries in ISO 14025, ISO 21930, or EN 15804.	If guidance on EPD summaries remains, start the section with: "EPD summaries are optional and may be offered at the discretion of the program operator. They shall contain…"
18	16	7.5	Technical	7.5 Declaration of Limitations This declaration is an environmental product declaration (EPD) in accordance with ISO 14025. EPDs rely on Life Cycle Assessment (LCA) to provide information on a number of environmental impacts of products over their life cycle. Exclusions: EPDs do not indicate that any environmental or social performance benchmarks are met, and there may be impacts that they do not encompass. LCAs do not typically address the site-specific environmental impacts, nor are they meant to assess human health. EPDs can complement but cannot replace tools and certifications that are designed to address these impacts and/or set performance thresholds – e.g. Type 1 certifications, health assessments and declarations, environmental impact assessments, etc. Accuracy of Results: EPDs regularly rely on estimations of impacts, and the level of accuracy in estimation of effect differs for any particular product line and reported impact. Comparability: EPDs are not comparative assertions and are either not comparable or have limited comparability when they cover	This requires the exact (and verbose) language to be included instead of being able to represent the same ideas using different and simpler text.	Insert a sentence at the beginning of this section with instructions for how to use this language: "The following information shall be addressed in the EPD:", then add a bullet point for Exclusions, Accuracy of Results, and Comparability. This enables program operators either to use this language as is or to integrate the intent of these statements into existing or new non-comparability statements.

				different life cycle stages, are based on different product category rules or are missing relevant environmental impacts. EPDs from different programs may not be comparable.		
19	16	7.6	Technical	• A statement that environmental declarations from different programs (ISO 14025) may not be comparable • A statement that this declaration represents an average performance, in such cases where an EPD declares an average performance for a number of products or manufacturing plant locations; [4] [4] "In the case where an EPD is declared as an average environmental performance for a number of products a statement to that effect shall be included in the declaration together with a description of the range/variability of the LCIA results if significant" When an average is being used, this guidance encourages the variability and range to be stated per impact category regardless of whether that variability has been deemed "significant".	Section 7.1 bullet #19 addresses the comparability statement bullet, and the product definition is the most appropriate place to state whether the EPD represents an average.	Delete the two bullets from this section and move the callout text to the product description bullet in section 7.1 (under either product definition or range of variability).
20	16	7.6	Technical	• An EPD shall report LCA defined parameters in EN 15804 Tables 7 – 12 for reported modules	EPDs are being used differently in North America than they are in Europe. Users in North America do not need or want modeling scenario information described to this level of detail in an EPD. The scenarios and additional technical information tables all contain information already provided in the LCA background report. Each PCR Part B should dictate which (if any) additional information shall be included in the EPD.	Remove the requirement to report these tables in North American EPDs. Alternatively, move the requirements to supplemental regional guidance for European EPDs.
21	16	7.6	General	• Consistency in dealing with uncertainty around differences in datasets and other forms of bias.	Verifiers already check for the consistent treatment of data and other forms of bias – this bullet point is redundant.	Delete this bullet point or be more specific about this requirement.

Table 2. Candidates for addition to POC Part A

#	Page	Section	Comment type	Guidance text	Comment	Proposed change
22	9	5.2	Technical	When a product EPD includes module A (product stage) only, the additional	The TAB considers this information to be useful to users when available as it relates to	Change 'Disposal' to 'Potential waste treatment scenarios.

				information regarding intended use of the product shall be provided, when available, as additional information including: • Other products not included in assessment needed for product to serve intended function in building • Anticipated replacement cycle of product in building context • Intended use • Disposal	all products. Since the manufacturer may not know how end users dispose of their products (especially in B2B applications), the language could be revised to say something more along the lines of 'potential waste treatment scenarios'.	The TAB will consider addition to Appendix C of Part A 2017: - Other products not included in assessment needed for product to serve intended function - Anticipated replacement cycle of product - Intended use - Potential waste treatment scenarios
23	11	5.3	Technical	Company Specific EPD When a company specific EPD is benchmarked against an existing company specific EPD from the same manufacturer, the following requirements shall be met: […]	All bullet points are practical.	No proposed change. The TAB will consider addition to Part A 2017.
24	13	7.1	Technical	The following general information shall be declared [in the EPD]: […] LCI database(s) used and version number	This requirement is appropriate for EPDs used in industry-wide benchmarking; however, for other EPDs, users in North America are not looking for modeling information described to this level of detail in an EPD.	Only require the LCI database(s) used and version number to be reported in EPDs used for industry-wide benchmarking. For Part A 2017, the TAB will consider the inclusion of LCI database(s) and version number in EPDs used for industry wide benchmarking.
25	14	7.2	Technical	The following general information shall be declared [in the EPD]: […] • A third party verified ISO 14040/44 conforming report must be made available for all secondary LCI data sets that contribute to more than 80% of total impact to any of the required impact categories identified by the applicable PCR.	Assuming this refers to the type of documentation already provided by GaBi and ecoinvent, this seems like a reasonable requirement to ensure data quality. Secondary LCI data sets with a high contribution which are not reviewed should be independently reviewed. However, the wording surrounding this requirement should change, since the data can only be critically reviewed, not verified.	Change the beginning of this bullet point to read, "Third party critically reviewed documentation must be made available". For Part A 2017, the TAB will consider requiring third party critically reviewed documentation be made available for all secondary LCI data sets that contribute to more than 80% of total impact to any of the required impact categories identified by the applicable PCR.

Table 3. Editorial comments

#	Page	Section	Comment type	Guidance text	Comment	Proposed change
26	8	3	Editorial	The section headings in the following sections correspond directly to EN 15804.	The section headings only correspond directly to EN 15804 up until section 7.1 – after that they do not directly correspond.	Edit the headings to correspond to EN 15804 or change the text key statement.
27	9	5.1	Editorial	5.1 Objectives of the Product-Specific PCR	Regarding the name of this section, 'product-specific PCR': PCRs do not refer to one product, but rather one product group.	Change the section title to "Objectives of the PCR Part B".

28	9	5.2	Editorial	**The current EN 15804 standard allows the exclusion of modules beyond the product stage (A1-A3). When a product EPD includes module A (product stage) only, the additional information regarding intended use of the product shall be provided, when available, as additional information including:**	The bolded text is not quote text, like the text key states. None of the text after the first sentence is included in EN 15804, either in quoted or summarized form.	Un-bold all text in section 5.2.
29	10	5.3	Editorial	**Error! Reference source not found.**	From this point on, there are a few broken references.	Fix where it gives a bold error message.
30	12	6.2	Editorial	This program encourages, when possible, EPDs that are cradle to grave in scope (modules A1-C4) but also recognizes EPDs that are cradle to gate in scope (modules A1-A3).	The program also recognizes EPDs with a scope of cradle to gate with options.	Revise sentence to read, "This program encourages, when possible, EPDs that are cradle to grave in scope (modules A1-C4) but also recognizes EPDs that are cradle to gate in scope (modules A1-A3) or cradle to gate with options in scope (specify options)."
31	13	7.1	Editorial	"Full conformance with the PCR for [Product category] allows EPD comparability only when all stages of a ceiling panel life cycle have been considered. However, variations and deviations are possible".	This sub-bullet refers directly to ceiling panels.	Revise the statement to refer to any product category.
32	14	7.1	Editorial	The following general information shall be declared [in the EPD]: […] • Identification of USGBC/UL Environment PCR Part A Enhancement and statement of conformance	This is the only place I can find that refers to this document as the 'USGBC/UL Environment' PCR Part A Enhancement.	Change the bullet to read, "Identification of this PCR Part A Enhancement and statement of conformance"

Table 4. Comments on the Part B Guidance

#	Page	Section	Comment type	Guidance text	Comment	Proposed change
33	1-5	Part B template	General	Part B template	There is no specific guidance here. USGBC should not require that other program operators use this specific format for creating Part Bs, as it currently favors one program operator over all others. If the intent is to align with the ACLCA Guidance on PCR Development, non-template guidance with specific requirements should be created.	Each program operator has their own program and uses their own template for PCR creation. Create a new document that contains specific guidance regarding the creation of Part Bs outside of a template format. Refer to the SM Part B to view the checklist of items addressed in that Part B template.
34	6-20	EPD template	General	EPD template	There is no specific guidance here. USGBC should not require that other program operators use this specific format for creating EPDs, as it currently favors one	The EPD requirements are already clearly laid out in the Part A Enhancement. Do not publish an EPD template. Refer to POC Part A Appendix C to see the content

					program operator over all others. Instead, list specific information requirements without prescribing a format. Each program operator has their own program and uses their own EPD template.	required in an EPD.