

Comments on section 2.8.4.2 – 1st Feb 2013

While Tier 2 is likely to be the most commonly used approach. Given the limited list of emission factors however, the uncertainty will be high and since HWP may account for very substantial pool pressure is likely to increase on countries to adopt a tier 3 approach.

The FOD allows a choice to be made of tier 3 methods but a standardised approach would clearly be preferable if it reduces uncertainty. Indeed, the example quoted promotes what appears to be a life cycle type approach to estimating the service life of a product type (from which it's considered possible to calculate the stored carbon as a function of time) and there is reference to both ISO 14040, rooted in Environmental Management, and to ISO standards intended for use in the building and construction sector. The FOD approach is sensible provided the Environmental Management and Building sector methodologies are fully compatible within the context of GHG emissions reporting at a tier 3 level. This needs checking because different standards have different scope and so need not necessarily deliver equivalent results.

The questions to resolve with ISO are:

1. ISO/TC 59/ Design life, SC14 - Building and construction assets – service life, produced ISO 15686-1:2011 with subsequent parts 2-10, of which part 8, Reference service life and service-life estimation (of construction products that is - many of which are traceable to 'harvested wood products'). The ISO catalogue states that these standards reference LCA & ISO 14044 – but the current FOD does not indicate whether the way that LCA is applied is complementary to the way that, for example, 14064-2 Greenhouse Gases - Part 2 does. Whether they are complementary depends on whether ISO TCs 59 and 207 are actively liaising on issues related to LULUCF and HWP. Are they?
2. Different ISO TC 207 subcommittees are responsible for LCA and GHG reporting. ISO 14064-2 Greenhouse Gases - Part 2 cross refers to 14040 and the IPCC - but only in its bibliography. ISO should be asked to provide an update of their work reconciling LCA and GHG reporting, especially for products, within an environmental management context.
3. In relation to item 2. ISO might also be asked where/how it is envisaged ISO 14067 is used in relation to LULUCF. ISO 14067 is entitled Carbon footprint of products - Requirements and guidelines for quantification and communication. According to the ISO website this standard is nearing completion and is due for delivery in July 2013. A supplementary question is whether the products and construction community will automatically pick it up. Will the new standard impact on the proposed methodology in the FOD?
3. Some useful info is/will be included in Draft BS EN 16449 Wood and wood-based products - Calculation of sequestration of atmospheric carbon dioxide, which belongs to committee B/543, fits with either of the two ISO TCs? According to the scope it applies to CSI 79.040 - Wood, sawlogs and sawn timber - so that would appear to be relevant too.