Use of low-carbon building materials to transition to low-carbon construction

- Feedback & response -

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Overview

This document outlines the feedback received from Normec Verifavia on version 0.95 of the GHG methodology for low carbon building materials, detailing how the feedback was addressed and its impact on the methodology, culminating in version 1 that will be publicly available.

Feedback contributors

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	Section	*Referenced Text*	*Feedback/comment*	*Response*
1	List of Definitions	Buffer pool	What will the buffer pool be with the new rules about issuance ?	A separate buffer pool will be applied to the Emission REduction Certificates (ERC) and the Carbon Removal Certificates (CRC). Again as discussed in comment 16 this will be decided during the POD development
2	Summary	Text: GHG reduction credits resulting from switching from conventional high-emission building products to low-carbon alternatives Carbon removal credits resulting from the carbon stored in biobased building products.	Comment: “Can projects generate both removal and avoidance credits ?” “Missing period”	Yes. We added the period and text for clarification purposes: “*Projects may generate both GHG reduction certificates and carbon removal certificates simultaneously if the applicable intervention reduces emissions and stores biogenic carbon* ”
3	1.2 Interventions	Text: A low-carbon building product manufacturer A constructor responsible for technical choices, design, and project oversight A real estate developer managing property development with a sustainability focus A cooperative or NGO operating in the agriculture or construction sector An environmental NGO or sustainability consultant guiding and supporting project implementation	Comment: How are credits allocated among these stakeholders ? Would they sign agreements with each other to not double count the credits/environmental benefits ?	**Agreements Between Stakeholders** • The allocation of credits and related income must be clearly specified in contractual agreements between the parties involved (e.g., developer, material supplier, builder, buyer). • These agreements define which stakeholder is entitled to which share of the credits and ensure there is no overlap in claims. • As part of every project, it will be mandatory to disclose what agreements are in place to govern allocation and avoid double counting of environmental benefits. **Avoiding Double Counting** • Our platform manages the issuance of credits on-chain and has strict controls to ensure that a single credit cannot be allocated or transferred twice. • Once credits are issued, they are uniquely identified and

		A municipal or government agency undertaking sustainable construction initiatives		tracked, which prevents duplication or conflicting claims. **Implications for the methodology** ● The methodology requires that project developers document the allocation arrangements within the project documentation submitted for validation. ● The VVB's review will thus include verifying that these agreements exist and are consistent with the methodology's safeguards against double counting.
4	1. Interventions	Emission reduction certificates, on the other hand, are issued when a formal contract exists between a constructor and a supplier confirming the future use of the low-carbon product in a specific construction project. These certificates are based on the difference in GHG emissions between the low-carbon building product and the conventional alternative, excluding any sequestration that has already been credited	Is there a max timeline for between the issuance and construction of a building?	The Interventions section has a purpose as an introductory section and explains briefly what interventions are in scope and issuance conditions. For that reason the maximum timeline is mentioned and defined as part of the section 1.4 Applicability. Updated text: "*Timeline condition:* *For Emission REduction Certificates (ERC)s, the construction project must start* ***within a maximum 32 months*** *from the date of certificate issuance. Projects that do not commence within this period are not eligible, and any certificates already issued must be cancelled or adjusted"*
5	1.5.1 Eligible products	Text: Projects to be eligible to use this methodology must focus on the usage of building products that demonstrate a lower product carbon footprint compared to the commonly used products equivalents.	Question: What is the range for applicability for other buildings' use of a product ? What if all the other buildings in the neighbourhood are high-emitting but in the city they are low-emitting ?	The comparison to "commonly used product equivalents" is not made at the micro level (e.g. a neighborhood), but rather at a broader, more representative regional or national scale This question is to address the prevalence additionality: what is the geographical scope of the prevalence? We added following text as footnote: 1. Section 1.5.1: The geographical scope for common practice is further addressed in section 1.6 Additionality.

				2. Section 1.6.1: Project Developers must state whether “common practice” is evaluated at the city, state/province, or national level, whichever best reflects data availability and the relevant product market area.
6	1.5.1 Eligible products	Text: Middle-cycle products (lifespan > 35 years): These products can demonstrate an extended lifespan. The CO2 that is stored in it is preserved for at least 35 years (e.g. insulation products, such as wall insulation, roof insulation, etc) Long-cycle products (lifespan > 100 years): These products can demonstrate an extended lifespan. The CO2 that is stored in it is preserved for at least 100 years (e.g. biobased concrete, etc)	Question: 1. Is there a max age the credit can have to be eligible? For example no more than 1 or 2 years old. 2. Does the methodology's calculation somehow distinguish between middle and long-cycle products ? Do you divide by the number of years ? 3. I see that the Proba standard states: Proba requires a minimum Storage Duration of 40 years for GHG Projects. How is this compatible with the medium-cycle products ?	1. Regarding the age of the credits, the Proba standard includes a relevant section “5.9 Carbon Credit Validity Period” We also added the option of retro active crediting. Update can be seen in Section 1.7 Crediting period: “*This methodology allows for retroactive crediting, in the case the use of low-carbon building materials was introduced within a maximum of two years prior to the submission of the validation of the POD.* *In such cases, the crediting period will begin at the moment the intervention was first implemented, provided that the project developer can fulfill the requirements set by this methodology (e.g., proof of additionality, baseline, scientific evidence, documentation etc.) and in addition demonstrate that the intervention was implemented with the intention of utilizing carbon finance.* “ 2. For each eligible building material (middle- or long-cycle), project developers will select academic LCA or PCF studies that assume a lifespan accordingly. Then they must extract the GWP impact value expressed per functional unit of the building product (e.g., CO_2eq per m² or per ton, which reflects the product’s characteristics, not a time dimension). Finally, we multiply that per-unit impact by the quantity of product used in the project. In addition, project developers must provide adequate justification for the assumed lifespan of their products based on performance tests or certifications. This allows us to verify whether a product appropriately qualifies as middle- or long-cycle within the methodology. 3. We will update the Proba Standard in the next version for consistency.
7	1.5.1 Eligible products	Text: Note: Products that are not entirely biobased but incorporate a proportion of biobased materials in their	Question: What is the minimum ratio for it to be eligible ?	We added the following text for clarification purpose: “*There is no minimum percentage of biobased material. Products with any fraction of biobased content are eligible, provided that they show a lower carbon footprint in comparison with the conventional building*

		final composition are also eligible under this methodology. For example, biobased concrete, which integrates hempcrete (a mixture of hemp fibers and lime).		*products*."
8	1.6.2 Insetting Scenario	Text: For insetting purposes, the project developer is only required to demonstrate regulatory additionality (see text above) but must also be transparent regarding prevalence and financial additionality in the POD.	Question: Why do the rules for additionality change when it is for insetting rather than for offsetting?	In offsetting, the emissions reductions certificates are used by a third party (outside the supply chain) to claim a reduction outside their own supply chain. This creates a need for strict additionality tests (regulatory, financial, and prevalence) to ensure the reductions are truly additional. In insetting, the reductions occur within the reporting company's own value chain (Scope 3), and are used to meet climate targets such as those under the SBTi. Because the claiming actor and the implementing actor are in the same supply chain, and because the reductions are not sold or transferred outside the supply chain, there is less risk of over-crediting or market distortion. Therefore, the focus is on regulatory additionality in order to ensure that the intervention goes beyond what is legally required. However, transparency about financial and prevalence aspects is still expected in the POD.
9	1.7 Crediting period	Text: For GHG projects utilizing low carbon building products, the crediting period can be set up to a range of 5 (minimum) to 10 years. This duration accommodates the use of multiple building products in a construction project and strikes a balance between providing enough time for projects to demonstrate their environmental impact and maintaining flexibility for project adjustments and improvements (e.g. new	Comment: Does the methodology's calculation somehow distinguish between middle and long-cycle products ? For example, could the project exist in theory for 100 years ? How do you guarantee that the building does not get demolished after 15 years for example ?	The crediting period of 5–10 years reflects the time during which GHG benefits are monitored and verified, not the full lifespan of the building or its materials. However, the methodology does account for the long-term impact of building products through the Reference Service Life (RSL). Each product used in the project (middle- or long-cycle) must have a documented RSL, supported by test data or literature. This RSL determines how long the product is expected to perform its function and retain its carbon benefits. Projects cannot claim 100-year permanence unless the RSL supports that duration. To address risks like early demolition or degradation, project developers must justify the expected storage duration and assess non-permanence risks. The claimed climate benefit is limited to what can be reasonably supported by the product's RSL, not hypothetical

		technologies or regulations).		building lifespans.
10	1.7 Crediting period	Text: Upon requesting renewal of the crediting period, Project Developers must also ensure compliance with any relevant updated version of this methodology, as well as any additional requirements introduced to maintain the integrity and credibility of the carbon credits.	Question: What is the methodology changes during the crediting period	We changed our current text in **Section 1.7 Crediting Period to** "Throughout the crediting period and upon requesting renewal of the crediting period, Project Developers must also ensure compliance with any relevant updated version of this methodology, as well as any additional requirements introduced to maintain the integrity and credibility of the carbon certificates (see Project Scoping Table in Section 4.1 Monitoring for the full list of compliance checkpoints)." We added the Project Scoping Table in Section 4.1. What this means in practice is that if the methodology is updated due to scientific advancements, regulatory changes, or improvements in GHG accounting practices (e.g. revised LCA or PCF calculation methods or carbon footprint factors), then projects are expected to adopt those updates to maintain the integrity and credibility of issued certificates
11	1.7 Crediting period	Retroactive crediting	This should probably be more specific. I would suggest having it 24 months instead of two years. For example: Project submitted in Dec 2025. Can you get credits from Jan 2023 ?	We accept the suggestion and we specified it to be "24 months" Project submitted in Dec 2025. Can you get credits from Jan 2023 ? Answer: Yes
12	1.8 Permanence	Text: For example, a building product with a potential lifespan exceeding 35 years will only store carbon for as long as the construction remains intact. If the construction is demolished after 30 years, the effective carbon storage duration will be significantly reduced.	Question: How is permanence proven by the project developer ?	Project developers must provide credible documentation that supports the expected carbon storage duration of the building product. This includes: • Scientific references and durability studies, such as third-party test results, material performance evaluations, or peer-reviewed publications that demonstrate how long the product can maintain its structural and functional integrity under normal use conditions. • Use-phase scenarios, aligned with industry standards (e.g. EN 15804), to model the fate of the material over time, including assumptions on degradation, maintenance, and replacement cycles. • Durability tests or certifications, where available, that indicate

				the resistance of the material to moisture, fire, pests, and other environmental stressors. In addition, the methodology requires the developer to assess the non-permanence risk, which includes risks of early demolition, degradation, or other events that may lead to the re-release of stored carbon. These risks must be documented in the POD along with corresponding mitigation measures and may be linked to a buffer pool if appropriate.
13	1.9 Risks and mitigation measures	Project developers must also provide a risk evaluation form, which outlines the risks described above. This form must assess, document, and provide mitigation measures to potential risks associated with the project's intervention.	Question: Does the computed risk from the evaluation template have a maximum eligible value for the project ?	No, but the scores guide risk mitigation: Permanence: Scores ≥10 trigger required action—either a mitigation plan approved by a VVB or a 3% buffer pool increase. ESDNH: No fixed disqualifying risk; evaluation is case-by-case with transparent documentation.
14	1.10 Co-Benefit		Comment: I would strongly suggest prescribing at least one co-benefit (more to make it official) rather than making a barrier for PDs. It will be very easy for a PD to have an SDG assigned to the project (waste, economic/employment, energy efficiency, etc). I would say you even NEED Co-benefits if the project is avoidance-based. Many registries require at least one SDG.	We added a text that at least one co-benefit is required in order to establish a project
15	1.11 Leakage	Text: indirect relocation	Comment: Indirect leakage can become very broad. I would suggest having a list of specific scenarios that you will include in the calculation for indirect leakage. Climate	It is written below: "Any significant sources of leakage must be conservatively taken into account in the GHG reduction calculations. Examples of leakage may include the following but are not limited to: - Increase of GHG emissions due to the relocation of previous cultivation activities, if biobased materials are used

			Dividends for example only includes direct leakage for this reason. The PD should also take a much more qualitative approach in discussing the risk of carbon leakage.	- Unexpected waste during certain phases (manufacturing, usage, etc), if not included in the PCF report" - We created a Leakage assessment table which indicates specific guidelines for market leakage.
16	2.1 Spatial boundaries	For emission reduction certificates, the direct measurement, reporting, and verification (MRV) procedure is limited to the delivery/selling of the product to the constructor, at which point certificates are issued.	Shouldn't this also include proof of use of building material ?	The project developer is not required to provide direct proof of use. What is required is an agreement that the purchased materials will be used by the constructor in the project (This is part of MRV and documented through contracts and delivery records). We added a footnote: "*The project developer must retain an invoice and delivery receipt that reference the project identifier, a contract that commits the constructor to use the specified quantities, and a post delivery confirmation that the materials were not returned or reallocated*"
17	2.1 Spatial boundaries	For carbon removal certificates, MRV and certificate issuance may occur at the point of sale of the harvested biomass from the raw material producer to the manufacturer, based on verified data from stages A1 and A2 (see Figure 1).	I don't understand what MRV is doing in this section. This section is more about the scope of the methodology/project rather than MRV.	We adjusted the text so that Section 2.1 only describes the spatial boundaries and point of issuance. MRV requirements are now referenced in the introductory text of the section. Updated text: "*For the quantification of carbon removal, the spatial boundaries cover stages A1 and A2 (see Figure 1) up to the transfer of harvested biomass from the raw material producer to the manufacturer. Certificates may be issued at this point of sale.*"
18	2.2 Temporal boundaries		Comment: part of the validation should be a projection of the amount of carbon reduced which is then monitored (maybe every 1/2 years) to see if the projection is still accurate	We agree and this projection is based on the blueprints that must be provided by the constructor. It is indicated in the section 5.2 Emission Reduction Certificates (ERC): "*invoices must clearly detail the specific quantities sold and the exact intended use of the product in the construction should be documented based on the blueprints of the construction.*"
19	3.1 Data credibility and sources of PCF	For products that store carbon: If the carbon sequestration potential of the	Can you provide an example ? I'm not sure I understand this.	Example: If a manufacturer uses locally sourced biomass that requires shorter transport distances and lower drying energy than assumed in the reference PCF report, the project developer must recalculate

	reports	biomass or fiber crops differs significantly from that presented in the PCF/LCA reports from Option 1, Project Developers must calculate the amount of biogenic carbon sequestered using recognized standards and equations. This includes specifying the carbon content of the biomass, emissions from cultivation and transport (Stages A1–A2), and justifying any waste factors (due to the manufacturing process) and deductions applied. All data sources, assumptions, and coefficients must be transparently documented.		emissions for cultivation and transport (Stages A1–A2) to reflect the lower energy use and reduced emissions compared to the default dataset.
20	3.1 Data credibility and sources of PCF reports	Option 1: Existing databases and softwares: However, while this option offers convenience, there may be trade-offs in terms of precision. There is a potential risk of reduced accuracy as the pre-compiled data might not reflect the specific conditions or latest changes relevant to a particular building product. In such cases (and other cases as depicted under option 2), the project developer is required to adopt Option 2 for data collection and analysis to ensure accuracy.	What kind of cases would make the project developer have to use option 2 ?	If a pre-compilled (specific enough) PCF/LCA report is not available for their building products (product in scope)

21	3.3 Baseline scenario	Text: The baseline scenario for a given project is valid for the entire crediting period, which is by default set to minimum 5 years. However, adjustments should be established under certain conditions:	Question: How is the quality of the building before renovation of the building taken into account, e.g. how do you determine how much longer the building would have without the project ?	The focus remains strictly on the building product and the materials that it consists of, not the entire construction project. Assumptions about service life or material use in the baseline are drawn from qualified LCA or PCF studies of similar conventional materials, rather than from full-building evaluations. The Project Developer must justify the relevance of the selected studies in the Project Overview Document, explaining how the baseline product's functional characteristics, application, and performance context align with those used in the selected literature. We added a sentence that states: *"For renovation projects, the baseline scenario must reflect the expected material performance or continued use of the existing products in the absence of the intervention. Where the remaining service life of baseline materials is uncertain, conservative assumptions must be supported by relevant LCA or PCF reports."*
22	3.3 Baseline scenario	Text: Material changes: Significant operational or environmental shifts can impact the initial PCF assumptions. This includes changes in production methods, scaling operations, technology, resource usage, regulatory conditions, and market dynamics. Such shifts may require a reevaluation of the baseline to ensure ongoing accuracy and relevance	Question: Other dynamics to consider especially for building materials and isolations is temperature increases due to climate change: Increased temperature = > potentially more emissions from Air Conditioners => Higher emissions from baseline if you "replace" air conditions" with sustainable alternative (project)	We edited the sentence to include climate change factor to be clearer: "*Material changes: Significant operational or environmental shifts can impact the initial PCF assumptions. This includes changes in climate, production methods, scaling operations, technology, resource usage, regulatory conditions, and market dynamics. Such shifts may require a reevaluation of the baseline to ensure ongoing accuracy and relevance*"
23	3.3 Baseline scenario		Comment: May be good to be a bit more specific for when adjustments of the baseline scenario need to be changed by giving concrete (pun intended) examples	Example calculations are provided in Appendix 3
24	3.4 Project	Text: 3.4 Project intervention	Can avoided demand for high	Avoiding the purchase of a high-emitting appliance (like an air

	intervention		emitting-goods count as a project ? For example in the case of air-conditioners if they were never bought but will be bought due to increased temperature.	conditioner) is not treated as a separate “intervention” under this methodology. Instead, any avoided-demand effect must arise from installing an eligible low-carbon building product (e.g. better insulation) that reduces cooling loads.
25	3.4 Project intervention	Text: Project developers must also determine and present in the POD the appropriate performance indicators, which may vary by product and material type. For example, Insulation capacity Thermal resistance (R-value) Load-bearing capacity Compressive strength	Question: Do you have a technology readiness level (TRL) scale ? https://en.wikipedia.org/wiki/Technology_readiness_level	While a TRL assessment can be useful in the early stages of product development, it is generally not the focus of this methodology. By the time a project developer considers applying for carbon certification, the product is typically already commercialized and has undergone the necessary TRL evaluations. At this stage, what matters most are the product’s demonstrated performance specifications—such as R-value, compressive strength, load-bearing capacity, and lifespan—which confirm its suitability and effectiveness for construction applications.
26	3.5 GHG impact quantification	Text: The quantity of low-carbon building products sold and used over the year (for building product manufacturers), or The quantity of low-carbon building products used in a construction project (for constructors).	How are the credits allocated to avoid double counting ?	Addressed in comment 2.
27	3.5 GHG impact quantification	Text: Note: Typically, a Buffer Pool is applied in GHG projects. This acts as a reserve of Carbon credits established to cover potential losses in GHG Projects, ensuring the integrity of emissions reductions or removals over time. The size of the Buffer Pool is aligned	Comment: Buffer pool calculations should be made clearer or potentially even made the same for all projects using the same methodology.	The buffer pool will be decided during the development of POD. Based on Proba standard: “For each GHG Project, the standard contribution to the Buffer Pool is set to 10%. Proba will assess the various risks (environmental, regulatory, project implementation) that may lead to premature reversal or lack of Permanence of each project.” We do not fully agree with applying the same buffer pool for every GHG project. For that reason we expect a separate assessment (e.g. related to risks) and decision making related to the buffer pool to be

		with the level of reversal risks associated with the GHG Project. The Project Developer should identify any such potential reversal risks and then include them as part of the POD in the form of a Buffer Pool.		made and described in the POD. It is stated in the methodology: "*The size of the Buffer Pool is aligned with the level of reversal risks associated with the GHG Project and ranges between 10% and 20%*"
28	3.5 GHG impact quantification	Text: For emission reduction certificates, project developers must calculate the annual avoided emissions by comparing the cradle-to-gate PCF of the low-carbon product to that of a functionally equivalent baseline product. The final calculation is based on the quantity of the low carbon building product sold from the manufacturer to the constructor.	I'm assuming the baseline may change from year to year if buildings use more and more isolating materials ?	A new bullet point ("Market and product evolution") has been added under Validity of baseline scenario and potential adjustments to make this explicit
29	3.5 GHG impact quantification		Question: Is there a cut-off to exclude very small emissions which can be difficult to calculate ? What kind of justification is necessary ?	There is no fixed cut-off in the methodology, but very small emission sources can be excluded if they are shown to be negligible compared to the main sources. The Project Developer should justify this in the POD by explaining that the omitted source contributes an insignificant share (e.g., <1%) of total emissions, and its inclusion would not materially affect the results. Simple reasoning or conservative estimates are acceptable, as long as they are documented transparently.
30	3.5 GHG impact quantification		Question: Can you provide a more detailed explanation for using 10% as the uncertainty factor ?This seems rather high compared to other registries (e.g. 6% for Riverse)	The 10% uncertainty factor cited in the methodology is used solely as an illustrative example in the calculation presented in Appendix 3. It is not a fixed or default value applied to all projects. It is important to note that in many cases, the LCA or PCF reports used by Project Developers already include an embedded uncertainty

				factor in their calculations. In this case and when the uncertainty assessment is well-documented and verified, there is no need to apply an additional uncertainty factor. The actual uncertainty factor (UF%) to be applied will be assessed on a project-by-project basis, based on the quality and completeness of the data, the assumptions used, and the methodological transparency of the PCF or LCA. The selected percentage must be clearly justified in the POD and will be subject to review by the VVB.
31	3.5 GHG impact quantification	Equation 1 $PCF/LCA_{lifetime}$	Comment: Writing PCF/LCA might be confusing in an equation because it looks like it says PCF divided by LCA	We changed it to 'or' to avoid confusion.
32	3.5 GHG impact quantification	Equation 1 Text: $E_{product\ i}$	Comment: I believe I'm wrong but by entering the equation with units it seems like the product leads to tCOe*Q and not tCO2e/FU	We switched the unit for $E_{product\ i}$ and $E_{Module\ A-D,\ product\ i}$ to (ton CO2e) and (ton CO2e/functional unit), respectively.
33	3.5 GHG impact quantification	Equation 1 Text: $FU_{lifetime}$ = The service lifetime of the building product. Namely, the expected lifespan of the project or building where the product is used. In this methodology, the FUlifetime for both commonly used and low-carbon products must be set the same. (year)	Comment: I'm not sure service lifetime is exactly accurate. I don't think you mean the unit would be in time, probable KGs of Cement (as an example)	*We changed the names to avoid the confusion:* $FU_{lifetime}$ → *Actual service lifetime (ASL)* $LCA\ or\ PCF_{lifetime}$ → *Reference service life (RSL)*
34	3.5.1 Equations to be applied	Equation 1	The equation should be clearer with Q being the number of FUs.	We revised Equation 1 to state the formula defines Q as the amount of building product/functional units.

	3.5.1 Equations to be applied	Equation 2	baseline equation is not specified anywhere.	It is specified in the introductory text of equation 1, that baseline and project intervention are quantified based on the same equation
35	3.5.1 Equations to be applied	Equation 3	I think this equation is wrong. If you cancel out the units I believe you get : CO2/FU = FU*FU	We made the change
36	3.5.1 Equations to be applied	Equation 3 Where: Qbiobased product i = The quantity of the biobased building product which is either 1) sold by the building product manufacturer, or 2) used by the constructor, depending on the nature of the project.	The units should be included here	We included the units
37	3.5.1 Equations to be applied	Equation 3 ASL/RSL = The service time correction factor. See Equation 1.	This should be instead the last input of the equation: FU lifetime etc	We made the proposed change
38	3.5.1 Uncertainty	Text: Uncertainty is an inherent aspect of LCA/PCF reports, as they include variability in emissions related to the activities assessed. However, **other** relevant uncertainties must also be addressed in the Project Design (POD).	Question: What is meant by "other" here	The reference to “other relevant uncertainties” is intended to capture sources of uncertainty that are not typically included within the LCA or PCF report itself. These may include, for example: • Assumptions related to differences between actual and reference service life (ASL vs. RSL) • Scenario-based modeling of end-of-life emissions or product degradation • Regional variability in baseline conditions • Potential reversal risks for stored biogenic carbon

				• Data limitations or use of proxy data outside the LCA system boundaries To improve clarity, we have revised the relevant section of the methodology to explicitly list these examples and better distinguish between uncertainties captured in the LCA or PCF and those that must be addressed separately in the Project Design (POD).
39	4.1 Monitoring	Text: Specific information retrieved from PCF or LCA reports	Question: What is considered to be sustainably sourced biomaterial	"Sustainably sourced" means the biomass must come from operations that avoid deforestation or high-impact land use. Any product lacking such proof is listed as ineligible under Section 1.5.2 (Not Eligible Products).
40	4.1 Monitoring	Monitoring table "Market distribution and use"	On the certification type column Shouldn't this also include CRC as the scope starts from when the biobased materials are sold to the manufacturer?	CRC is already included under Raw material supply, where contracts and invoices are required to show the delivered quantity of bio-based materials and the quantity intended to be incorporated into the final building product. The Market distribution and use row focuses only on the final building product and its delivery to the constructor, which applies to ERC
41	4.2 Reporting	Text: 4.2 Reporting Monitoring reports must include the following: General project description: A summary of the project, including the geographical location of construction projects, fields, or production facilities where the baseline data was established and low-carbon building products are utilized..... Proof of product use: A recordkeeping plan that includes documentation such as invoices, purchase orders, delivery receipts, and other proof that demonstrates the application or use of	Comment: The methodology should make it clearer what documents are necessary for full validation/verification.	We made it more clear and highlighted that this information should be described and be available in the POD. We always share a template for VVB to cross check the availability of the necessary documents for the MRV procedure. It is an extended version of the Monitoring table that is in the methodology. For clarification purposes we added in the methodology in section 4.2 Reporting: "Project Developers must ensure that all documentation referenced in Tables 1 and 2 in Section 4.1 Monitoring is compiled in an organized manner and included in the POD. This includes supporting evidence such as contracts, invoices, purchase orders, technical specifications, LCA or PCF reports, and any quality assurance records. These documents will be reviewed during the verification process (see Section 4.3 Verification)."

		low-carbon building products in the construction project.		
42	4.3 Verification		Comment: Maybe adding a point saying: that the project still follows its PDD and the methodology of Proba	It is mentioned in the last paragraph of the section
43	Appendix 2.1.1 Databases for LCA reports	Text: 2.1.1 Databases for LCA reports	Comment: I would highly suggest adding Inies database in your methodology	We added information about the database: “Inies Database Scope: A French LCI/LCA repository for construction products and materials, offering Environmental Product Declarations (EPDs) tailored to local manufacturing and end-of-life scenarios. Usage: Project Developers in France (or using French datasets) can obtain EPDs and inventory data for baseline and project calculations, ensuring that impacts reflect French energy mixes and waste practices. Advantages: Localized Accuracy: Reflects French production, transport, and waste management assumptions. Broad Manufacturer Coverage: Many French suppliers publish directly to Inies, providing up-to-date, verified data. Regulatory Alignment: Recognized by French authorities (e.g., ADEME) and often required for public procurement or green-building certifications.”
44	Appendix 3.1 Baseline identification	The table	Question: 1. The table does not show any dynamic effects (RSL) which is what it is supposed to show 2. What is the source of the factors in the table ?	The table was developed internally by the Proba team to illustrate representative baseline values for commonly used building materials in the European context. The specific materials referenced are listed in the first column of the table. The Reference Service Life (RSL), is integrated into the calculation methodology and is addressed in detail in Section 1.2 and an example calculation in Appendix 3, where differences in service life between project and baseline products are accounted for through adjustment factors

45	Project applicability		1. What is the minimum number of credits to be generated for a project to be acceptable? 2. Is there a maximum distance of biomass source that is accepted ?	1. There is no formal limit on how many certificates a project must generate to be accepted under this methodology. As long as the project meets all eligibility, additionality, monitoring, and permanence requirements, it can register. 2. There is no threshold on the maximum distance that is mentioned in the methodology. However, if this distance is too long it will be shown in the LCA or PCF report of the product and it may not be considered sustainable practice
46	Minimum level of assurance VVBs must provide		Do VVBs need to provide their service with a limited or reasonable level of assurance ?	This is mentioned in the Proba Standard and in this document: https://proba.earth/hubfs/Downloads/Proba_code_of_conduct_VVBs.pdf
47	Environmental metrics		Are you using other environmental metrics ? I see LCA and PCF used equivalently.	The methodology focuses solely on GHG impacts, so we use LCA-derived PCFs (product carbon footprints) as the metric for both baseline and project scenarios. Although a full LCA can report other environmental indicators (water use, toxicity, eutrophication, etc.), those are outside this methodology's scope and do not affect credit calculations. However, the rest of the impact categories will be assessed in order to identify any relevant risks. In other words, "LCA" in our context always refers to the carbon-focused output (PCF), and no additional environmental metrics are credited.
48	Risk assessment - ESDNH		You may add a governance section in the risk assessment, so it encompasses all aspects of ESG: Legal Authority & Ownership: Are carbon rights and land tenure clearly defined and legally secure? Decision-Making & Oversight: Is there a transparent and accountable governance structure in place?	The new POD template of Proba requires an assessment related to the governance or management of risks, which must be documented and addressed by the project developers. The new POD template will be publicly available on the Proba website.

			Conflict Resolution: Is there a fair, accessible grievance or dispute resolution process? Regulatory Compliance: Is the project aligned with national laws and carbon market standards?	
49	Risk evaluation – Emissions to air impact rating	Text: Air emissions are minimal or fully offset (e.g., clean fuels)	What does offset mean in this context?	In this context, “offset” refers to emissions being compensated for. For example, using clean fuels or technologies that neutralize or balance out the emissions produced. We changed to “Air emissions are minimal or fully neutralized through clean technologies (e.g., clean fuels)” to avoid confusion
50	Risk evaluation – ESDNH and Permanence Assessment	Text: - Energy-Intensive-Production: Energy-intensive processes (e.g., heating, kilns, drying, machinery); fully dependent on fossil fuel AND Fossil-based processes are central, irreversible in current setup, and conflict with core GHG claims; crediting at risk. - Labor Rights & Workspace Conditions: Frequent non-compliance in H&S, working hours, or wages; no clear grievance or oversight process AND Systemic labor issues result in reputational harm or stakeholder backlash; weakens climate co-benefit narrative.	Many of the probability and impact ratings seem to be the same but phrased differently.	We rephrased it to make it clearer that the probability is how likely the risk happens and the impact is if the risk happens, how it affects the claimed reduction.

		Natural Risks: Not in a seismic zone AND Not in a seismic zone.		
51	Risk evaluation		Is the risk evaluation based on another registry or a scientific document?	The Permanence criteria was inspired by the https://unfccc.int/resource/docs/2014/smsn/igo/145.pdf The ESDNH criteria are built based on the ISO 14001 Standard and the Proba Standard.
52	Risk evaluation – Permanence Assessment	Text: Changes in regulation: Regulatory changes could mandate the use of low-carbon materials or alter the conditions under which certificates can be claimed. Carbon storage is deemed invalid, leading to total loss of removals.	I don't understand what these two aspects have with each other.	We changed the text to be more specific "Changes in regulation: Regulatory changes could mandate the use of low-carbon materials (affect the project's additionality) or impose new eligibility criteria for claiming certificates"