Template for submitting proposals related to GHG Protocol's *Corporate Standard, Scope 2 Guidance, Scope 3 Standard, Scope 3 Calculation Guidance* and market-based accounting approaches

(Optional)

Proposal instructions

GHG Protocol is conducting four related surveys in reference to the following GHG Protocol standards, guidance and topics:

1. Corporate Accounting and Reporting Standard (Revised Edition, 2004) ("Corporate Standard")
2. Scope 2 Guidance (2015)
3. Corporate Value Chain (Scope 3) Accounting and Reporting Standard (2011) ("Scope 3 Standard"), and Technical Guidance for Calculating Scope 3 Emissions, version 1.0, 2013 ("Scope 3 Calculation Guidance")
4. Market-based accounting approaches

The survey is open until February 28, 2023. To fill out the survey, click here.

As part of the survey process, respondents may provide proposals for potential updates, amendments, or additional guidance to the *Corporate Standard, Scope 2 Guidance, Scope 3 Standard, or Scope 3 Calculation Guidance*, by providing the information requested in this template. You may also use this template to provide justification for maintaining a current approach on a given topic.

Submitting proposals is optional. Respondents may submit multiple proposals related to different topics.

Proposals should be as concise as possible while providing the requested information. Submissions that are outside of the template may not be considered. Proposals may be made publicly available.

To submit the proposal, please save this file and fill out the fields below. When you've completed your proposal, please send the file as an attachment to info_ghg@ghgprotocol.org. Please name your file STANDARD_Proposal_AFFILIATION, e.g., *Scope 2_Proposal_WRI*.

Respondent information

Name

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Organization

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If proposals are made publicly available, would you like your proposal to be made publicly available? Please write either "Yes" (make publicly available) or "No" (do not make publicly available).

Yes

If your proposal is made publicly available, would you like it to be made publicly available with attribution (with your name and organization provided) or anonymous (without any name or organization provided)? Please write either "With attribution" or "Anonymous".

With attribution

Proposal and supporting information

1. **Which standard or guidance does the proposal relate to (Corporate Standard, Scope 2 Guidance, Scope 3 Standard, Scope 3 Calculation Guidance, general/cross-cutting, market-based accounting approaches, or other)? If other, please specify.**

Corporate Standard, Scope 2 Guidance, market-based accounting approaches

2. **What is the GHG accounting and reporting topic the proposal seeks to address?**

The Clean Energy Buyers Institute (CEBI), a 501c3 research nonprofit, would like to offer a proposal in our Recommendation 2 herein providing rationale and guidance on how to maintain and enhance the market-based method under Scope 2 to advance systemic electric grid decarbonization globally.

This proposal is informed by research conducted under CEBI's Next Generation Carbon-Free Electricity Initiative ("NextGen CFE Initiative"), which aims to expand the menu of clean energy procurement options available to energy customers globally to ensure more powerful, targeted market signals exist to accelerate private sector investment in driving down greenhouse gas emissions and leading to systemic electric grid decarbonization. This research was informed by input from over 100+ energy customers, solution providers, and voluntary market stakeholder organizations (i.e., standards bodies, energy attribute certificate registries, data providers, customer leadership programs, government representatives, think tanks, NGOs, and academic researchers) gathered through a dozen workshops as well as numerous interviews and small group meetings. The outcome of this work are informed proposals for how to introduce updated voluntary market system infrastructure to enable customers to pursue the most impactful procurement decisions that they can—through enhanced energy attribute certificates (EACs), more granular and consistent energy and emissions data, new or modified customer leadership programs, and clarified greenhouse gas accounting.

3. What is the potential problem(s) or limitation(s) of the current standard or guidance which necessitates this proposal?

The current Greenhouse Gas (GHG) Protocol guidance is currently missing a straightforward methodology by which customers that procure carbon-free electricity (CFE) in the most carbon-intensive places and times can account for the differentiated emissions impact of this action. It is essential to offer customers—the main users of the GHG Protocol's Corporate Standard—a means by which they can reflect the differentiated decarbonization impact of their procurement decisions in their greenhouse gas accounting. The absence of an indicator in the GHG Protocol that reflects the differentiated decarbonization impact of CFE procurement hinders the ability of customers that want their procurement decisions to send the most powerful market signals possible in the most carbon-intensive places and times.

As detailed in Recommendation 1, customers have eight objectives for next generation procurement, where two of these objectives focus on how customers want the ability to procure CFE in the most carbon-intensive places and times. Among the various market evolutions defined in CEBI's NextGen CFE Procurement Activation Guide, one of the most important updates necessary to the GHG Protocol is greater clarity around how to account for procurement decisions that vary based on the grid carbon intensity of the time and place where CFE procurement occurs.

4. Describe the proposed change(s) or additional guidance.

In this Recommendation 2, CEBI recommends that the GHG Protocol should explore the pros and cons of options to add a required avoided carbon emissions impact-based number and where to put that value in addition to the location-based and market-based methods. This new avoided emissions impact-based number would help reflect the differentiated grid decarbonization impact of CFE

procurement. CEBI is furthering conversations around the merits of this approach and any pre-requisites needed to feasibly calculate, utilize, and report this figure. This new avoided carbon emissions impact-based number should complement, not replace, existing location-based and market-based indicators and prioritize capturing the differentiated impact of procuring a given megawatt-hour of CFE.

Introducing a new avoided emissions impact-based indicator would likely require the GHG Protocol to define a clear hierarchy of emission factors that indicates to GHG Protocol users how to reflect and report avoided emissions in their annual greenhouse gas inventories based on differing avoided emissions attributes of their CFE procurement. This guidance should include the spectrum of data sources to use to verify avoided emissions-based attributes to generate the new number associated with a given MWh of CFE procurement. This hierarchy would likely place at the top avoided emission-related attributes that are directly attached to an energy attribute certificate (EAC) that a customer procured, where this avoided emission attribute would enable differentiation across different carbon-free MWh. If a given EAC registry does not yet provide avoided emission-based attributes on the EACs issued in its respective system, then the GHGP would likely want to indicate which data sources and data granularity a customer should use to determine and report this number.

CEBI's Recommendation 2 would likely require additional and separate efforts to add avoided emissions attributes to EACs to maintain a system of evidence-based claims.

In evaluating the pros and cons of options for an avoided emissions-based number, it is important to emphasize that avoided emissions should not be used in any way as a carbon offset. Instead, an avoided emissions impact-based number would reflect the differentiated market signals that customers send through their procurement for more CFE investments in the places and times that deliver the greatest decarbonization impact.

Following the proposed exploratory exercise to evaluate the pros and cons of different options for an avoided emissions impact-based number in updates to the GHG Protocol, energy customers would, upon the introduction of this new number, likely gain the ability to reflect their voluntary action through any of the following three indicators that inform and reflect customer decisions:

1. **A location-based number**, which reflects the state of the grid and which customers can reduce through energy efficiency, supporting utility-led decarbonization, and relocation to locations with less carbon-intensive grids.
2. **A market-based number**, which reflects the proportion of CFE procurement covering a customer's electricity use through the matching of MWh consumption with claimed EACs and which customers can reduce by increasing their procurement of CFE to 100% coverage and proving ownership claims over market-based instruments (namely, EACs).
3. **A (new) avoided emissions impact-based number**, which reflects the differentiated avoided emissions impact of completed CFE procurement and which customers can optimize and verify by procuring CFE in the most carbon-intensive locations and times of day.

5. **Please explain how the proposal aligns with the GHG Protocol decision-making criteria and hierarchy (A, B, C, D below), while providing justification/evidence where possible.**

   A. **GHG Protocol accounting and reporting approaches shall meet the GHG Protocol accounting and reporting principles (see Annex for definitions):**
      - Accuracy, Completeness, Consistency, Relevance, Transparency
      - Additional principles for land sector activities and CO_2 removals: Conservativeness, Permanence, and Comparability if relevant

CEBI's Recommendation 2 promotes all five core GHG Protocol principles for Scope 2 accounting. This recommendation focuses primarily on how the GHG Protocol can introduce a new impact-based indicator to reflect the decarbonization impact of voluntary CFE procurement.

Introducing an avoided carbon emissions impact-based number would help address current concerns that various stakeholders have raised about the role of CFE procurement in greenhouse gas inventories because it would better enable customers to differentiate across CFE procurement options based on their decarbonization impact, enabling customers to procure CFE that sends the most powerful and targeted market signals possible for more CFE in the most carbon-intensive places and times. This will help hasten and scale the deployment of CFE investments to advance toward systemic grid decarbonization.

CEBI's Recommendation 2 would likely require additional and separate efforts to add avoided emissions attributes to EACs. The addition of avoided emissions-based attributes to EACs would enable customers to differentiate across different carbon-free MWh and associated EACs so they can better optimize for the decarbonization impact of procurement decisions. Said another way, these enhanced EACs create better tools for discovering, procuring, and verifying CFE in the most carbon-intensive locations and times, resulting in stronger market signals for more CFE resources to become deployed in those places and times—driving systemic grid decarbonization.

The introduction of avoided emissions-based attributes to EACs would also be bolstered by another new EAC attribute—an hourly timestamp (known as granular certificates, or GCs)—because it would enable customers to send more granular, time-specific market signals that consider the varying grid carbon intensity and/or marginal emission factors over the course of a given day.

   B. **GHG Protocol accounting and reporting approaches shall align with the latest climate science and global climate goals (i.e., keeping global warming below 1.5°C). To support this objective (non-exhaustive list):**
      - Direct emissions reported in a company's inventory should correspond to emissions to the atmosphere. Reductions in direct emissions reported in a company's inventory should correspond to reductions in emissions to the atmosphere.
      - Indirect emissions reported in a company's inventory should in the aggregate correspond to emissions to the atmosphere. Reductions in indirect emissions reported in a company's inventory should in the aggregate correspond to reductions in emissions to the atmosphere.

Insofar as electric grid decarbonization is imperative to reducing global emissions and investments are necessary to achieve systemic grid decarbonization, energy customers and the voluntary markets where they engage are essential to complementing policymaker action. Customers' CFE procurement increases revenues for CFE resources by billions of dollars every year, according to research on EAC revenues by those like Allied Market Research and EAC transaction volumes by those like RECS International and CRS, together enhancing the financial investment case for these projects when compared with non-CFE resources. The additional revenue that EAC sales generate allows CFE resource developers to reinvest revenue in new projects, reduces investment risks, and creates a larger pool of money that expands capital availability for more investments. This cycle has a snowball effect, enlarging the clean energy ecosystem and increasing political will (since policymakers can point to private sector validation)—all essential to the investments necessary to keep global warming below 1.5°C.

There is an opportunity to direct more of this voluntary procurement toward creating needed market signals for deploying more CFE in the most carbon-intensive places and times. Because energy customers have the strongest incentive to pursue emission reduction options that they can count in their annual greenhouse gas inventories and reporting, there is likely value in introducing a new avoided emissions impact-based number that offers a way to reflect the differentiated decarbonization impact of customers' CFE procurement in terms of the resulting market signals.

More specifically, CEBI's Recommendation 2 promotes the latest climate science and goals by enabling and encouraging customers to differentiate across CFE procurement options based on decarbonization impact while maintaining a consistent, comparable, attribution-based, and evidence-based voluntary market system. In other words, this recommendation maintains the fundamentals of global voluntary markets where customers make verifiable claims about their CFE procurement while exploring the role of a new impact indicator and incentive for customers to discover and transact CFE that sends the most targeted market signal possible for more CFE in the places and times that need it most to decarbonize the grid.

C. GHG Protocol accounting frameworks should support ambitious climate goals and actions in the private and public sector.

- Would this proposal enable organizations to pursue more effective GHG mitigation/decarbonization efforts as compared to the existing standards and guidance? If so, how?
- Would this proposal better inform decision making by reporting organizations and their stakeholders (e.g. related to climate-related financial risks and other relevant information associated with GHG emissions reporting)?

Yes: CEBI's Recommendation 2 would set forward a process that ultimately helps incentivize and enable energy customers to pursue more effective GHG mitigation/decarbonization efforts in an evidence-based way. In addition, the resulting market signals from customers' procurement would have the effect of encouraging investors to deploy more CFE resources in the times and places that appeal to customers—deploying traditional market forces of supply and demand toward investment in the places and times that are currently most carbon intensive.

A new avoided emissions impact-based number would enable customers to better pinpoint their CFE procurement to options available in the most carbon-intensive places and times. This would augment the revenue potential that CFE resource developers and investors can expect from CFE resources deployed in these places and times by increasing the EAC revenue and reducing risk those resources secure from CFE procurement—hastening and scaling deployment of CFE resources that meet customers' needs and deliver the optimum decarbonization impact on the grid.

D. GHG Protocol accounting frameworks which meet the above criteria should be feasible. (For aspects of accounting frameworks that meet the above criteria but are difficult to implement, GHG Protocol should provide additional guidance and tools to support implementation.)

- What specific information, data or calculation methods are required to implement this proposal (e.g., in the case of scope 2, data granularity, grid data, consumption data, emission information, etc.)? Would new data/methods be needed? Are current data/methods available? How would this be implemented in practice?
- Would this proposal accommodate and be accessible to all organizations globally who seek to account for and report their GHG emissions? Are there potential challenges which would need to be further addressed to implement this proposal globally? What would be the potential solutions?

To support the introduction of CEBI's Recommendation 2, customers must have the ability to differentiate across CFE procurement options and deliver verifiable claims based on the grid carbon intensity in the places and times where they procured CFE. This will require EAC issuing bodies and registries to add a new attribute to EACs reflecting the average grid carbon intensity, marginal emission factor, and potentially other carbon metrics in the time and place where the CFE-generation associated with a given EAC occurred. Adding a carbon stamp(s) to EACs would also become augmented by the introduction of an hourly timestamp in EAC issuing body and registry systems (i.e., introducing granular certificates, or GCs). In markets where the EAC issuing body and registry do not yet include an average grid carbon intensity stamp and/or marginal emission factor on issued EACs, the GHG Protocol must provide an emission factor hierarchy to inform how energy customers can capture and report the avoided emissions-based impact of their completed CFE procurement.

6. Consistent with the hierarchy provided above, are there potential drawbacks or challenges to adopting this proposal? If so, what are they?

Beyond the effort to evaluate the pros and cons of different options, CEBI anticipates the main challenges will reside in the GHG Protocol:

a) communicating to users and non-user stakeholders why introducing a new avoided emissions-based indicator is an elegant solution that addresses concerns about driving and capturing impactful voluntary clean energy procurement;

b) determining the best sources/hierarchy of data and methodology through a robust stakeholder process; and

c) clarifying how/why the inclusion of an impact-based indicator is unrelated and should not be treated as carbon offsets.

In addition, it will take time for EAC registries to adopt and implement changes to capture new attributes on EACs necessary to enabling differentiated decarbonization impact claims from CFE procurement, but updates to the GHG Protocol have the unique potential to accelerate that transition and adoption because EAC registries are supposed to respond to demands from their users.

7. Would the proposal improve alignment with other climate disclosure rules, programs and initiatives or lead to lack of alignment? Please describe.

Yes: CEBI's Recommendation 2 promotes the use of market-based instruments to enable customers to make verifiable claims about CFE procurement that drives CFE resource investments delivering greater emissions reductions on the electric grid and enables procurement that further advances science-based target decision making. Through this recommendation energy customers can better understand how to optimize for and reflect the differentiated decarbonization impact of procurement decisions. This would enable and further incentivize customers to prioritize procurement of CFE in the most carbon-intensive places and times, thus supporting and accelerating regional, national, and international grid decarbonization efforts. By maintaining yet enhancing a system of attribution-based claims for CFE procurement and potentially introducing a new avoided emissions impact-based number (within or outside the GHG Protocol) that leverages new (not yet introduced) EAC attributes and enables energy customers to better articulate the decarbonization impact of their CFE procurement, CEBI's Recommendation 2 may also be relevant and potentially helpful with further empowering customers to better achieve and report on their verified decarbonization measures in financial reporting (e.g., the United State Securities and Exchange Commission), trade-related tariff compliance (e.g., the European Union's carbon border adjustment mechanism), and other emerging regulatory reporting schemes.

8. Please attach or reference supporting evidence, research, analysis, or other information to support the proposal, including any active research or ongoing evaluations. If relevant, please also explain how the effectiveness of the proposal can be evaluated and tracked over time.

Please consider the following resources that informed CEBI's Recommendation 2:

CEBI's Next Generation Carbon-Free Electricity Procurement Activation Guide, which specifies the ways to evolve the voluntary market system—namely, through enriched EACs, more granular and consistent data, updated customer leadership programs, and enhanced greenhouse gas accounting—to expand the menu of CFE procurement options available to customers to send more targeted,

powerful market signals and optimize decarbonization impact: https://cebi.org/wp-content/uploads/2022/10/Community-Guide_Oct31st_v1.pdf

CEBI's Applying The Consequential Emissions Framework For Emissions-Optimized Decision-Making For Energy Procurement And Management: https://cebi.org/wp-content/uploads/2022/11/Applying-The-Consequential-Emissions-Framework-For-Emissions-Optimized-Decision-Making-For-Energy-Procurement-And-Management.pdf

CEBI's 101 overview about why EACs are essential to functioning voluntary markets: https://cebuyers.org/blog/with-enhanced-energy-attribute-certificates-energy-customers-can-use-their-voluntary-procurement-to-send-more-powerful-and-targeted-market-signals-for-systemic-grid-decarbonization/

RECS International's annual growth of global voluntary clean energy markets in the US, Europe, and international markets: https://recs.org/app/uploads/2022/10/REC22078_Annual2021-FINAL.pdf

CEBA's U.S. CFE capacity additions enabled by customer CFE deals: https://cebuyers.org/deal-tracker/

BloombergNEF's research on energy transition trends and the role of the private sector in energy transition investments: https://assets.bbhub.io/professional/sites/24/Energy-Transition-Investment-Trends-Exec-Summary-2022.pdf

Allied Market Research's research on the billions of dollars in additional revenue that customers provide: https://www.alliedmarketresearch.com/renewable-energy-certificates-market

Sol Systems publication about the role that EACs play in terms of additional revenue in the revenue stack generated by CFE resources: https://www.solsystems.com/reimagining-rec-markets/

Lawrence Berkley Labs' research on the interwoven, complementary relationship between policymaker action and customer action: https://eta-publications.lbl.gov/sites/default/files/rps_status_update-2021_early_release.pdf

International Energy Agency's How customers' procurement complements policymaker action: https://iea.blob.core.windows.net/assets/4a07d1b5-1beb-4611-874d-7acd4f21d9eb/AdvancingDecarbonisationthroughCleanElectricityProcurement.pdf

CRS Accounting for Standard Delivery Renewable Energy: https://resource-solutions.org/document/030921/

WattTime's research on accounting for decarbonization impact: https://www.watttime.org/app/uploads/2022/09/WattTime-AccountingForImpact-202209-vFinal2.pdf

REsurety's research on Scope 2 accounting and driving the next phase of grid decarbonization: https://resurety.com/wp-content/uploads/2022/10/Making_It_Count_White_Paper.pdf

Green Strategies and The NorthBridge Group report, supported by Clean Air Task Force, about corporate CFE procurement and GHG accounting: https://www.greenstrategies.com/new-white-paper-on-corporate-clean-energy-procurement-and-ghg-accounting/

9. If applicable, describe the process or stakeholders/groups consulted as part of developing this proposal.

In 2022, CEBI formed a community of 100+ energy customers, solution providers, and voluntary market system stakeholders as part of our NextGen CFE Initiative. CEBI convened a dozen total workshops as well as numerous small group meetings and 1:1 calls to develop robust guidance about how to evolve the voluntary market system and activate the future of clean energy procurement. CEBI's complete NextGen CFE Procurement Activation Guide is available online via https://cebi.org/wp-content/uploads/2022/10/Community-Guide_Oct31st_v1.pdf.

More specifically, CEBI convened seven workshops (of the total 12 NextGen CFE Initiative workshops) and small group meetings representing diverse organizations and perspectives in 2022 about how to update the GHG Protocol to better motivate and reflect verifiable implementation of next generation CFE strategies. In our most recent workshop in December 2022, CEBI polled participants and received high overall support for Recommendation 2: over 75% of 35+ polled participants indicated general support for introducing an impact-based indicator to Scope 2 accounting.

10. If applicable, provide any additional information not covered in the questions above.

To understand how and why an avoided emissions impact-based number may result in different procurement decisions, market signals, and CFE resource deployment outcomes, consider this scenario with two energy customers, Customer A and Customer B. If both Customer A and Customer B procure the same amount of CFE 100% equal to their electricity use on an annual basis and have the EACs in their accounts to prove this claim, then both can verify a market-based indicator of zero. But, because Customer A prioritized CFE procurement in the most carbon-intensive places and/or times based on the avoided emissions impact-based attributes attached to available EACs, then Customer A would reflect a greater avoided emissions number in their greenhouse gas inventory compared to Customer B (even though their market-based number may be the same) because Customer A's procurement delivered greater decarbonization impact than Customer B's procurement in less carbon intensive places and times.

CEBI expects that the proposal summarized in this recommendation, along with the additional and separate recommendations CEBI is submitting to the GHG protocol, would help expand the global participation in CFE markets while in parallel further motivate customers to optimize the decarbonization impact of procurement decisions—hastening greater volumes of grid decarbonization investments and directing these investments to the places and times that are the most carbon-intensive.

CEBI encourages the GHG Protocol to apply the following three principles to all updates being considered and implemented:

Guiding Principle #1: GHG Protocol updates should help expand CFE procurement options for energy customers rather than narrow them.

Guiding Principle #2: GHG Protocol updates should encourage ambition without unduly limiting options for energy customers given their diverse skillsets, resources, and geographic dispersal.

Guiding Principle #3: GHG Protocol updates should maintain yet enhance the momentum of the current voluntary CFE procurement market—enabled by market-based accounting—that is demonstrably complementing policymaker action in decarbonizing the grid.

Also, if the GHG Protocol finds that more research is needed to adequately understand the implications of updates to the market-based method, particularly in terms of whether these updates would accelerate or hinder the deployment of CFE resources on electric grids across the globe, then CEBI encourages the GHG Protocol to initiate a research process that gathers expert analyses and the perspectives of customers that are setting and executing CFE procurement strategies.

Proposal Annex

GHG Protocol Decision-Making Criteria and Hierarchy

A. First, GHG Protocol accounting and reporting approaches shall meet the GHG Protocol accounting and reporting principles:

- Accuracy, Completeness, Consistency, Relevance, Transparency
- Additional principles for land sector activities and CO_2 removals: Conservativeness, Permanence, and Comparability if relevant
- (See table below for definitions)

B. Second, GHG Protocol accounting and reporting approaches shall align with the latest climate science and global climate goals (i.e., keeping global warming below 1.5°C). To support this objective (non-exhaustive list):

- Direct emissions reported in a company's inventory should correspond to emissions to the atmosphere. Reductions in direct emissions reported in a company's inventory should correspond to reductions in emissions to the atmosphere.
- Indirect emissions reported in a company's inventory should in the aggregate correspond to emissions to the atmosphere. Reductions in indirect emissions reported in a company's inventory should in the aggregate correspond to reductions in emissions to the atmosphere.

C. Third, GHG Protocol accounting frameworks should support ambitious climate goals and actions in the private and public sector:

- Accounting framework/s would enable organizations to pursue more effective GHG mitigation/decarbonization efforts as compared to the existing standards and guidance
- Accounting framework/s would better inform decision making by reporting organizations and their stakeholders (e.g. related to climate-related financial risks and other relevant information associated with GHG emissions reporting)

D. Fourth, GHG Protocol accounting frameworks which meet the above criteria should be feasible to implement for the users of the frameworks.

- For aspects of accounting frameworks that meet the above criteria but are difficult to implement, GHG Protocol should provide additional guidance and tools to support implementation.

GHG Protocol Accounting and Reporting Principles

Principle	Definition
Accuracy	Ensure that the quantification of GHG emissions (and removals, if applicable) is systematically neither over nor under actual emissions (and removals, if applicable), and that uncertainties are reduced as far as practicable. Achieve sufficient accuracy to enable users to make decisions with reasonable assurance as to the integrity of the reported information.
Completeness	Account for and report on all GHG emissions (and removals, if applicable) from sources, sinks, and activities within the inventory boundary. Disclose and justify any specific exclusions.

Consistency	Use consistent methodologies to allow for meaningful performance tracking of emissions (and removals, if applicable) over time and between companies. Transparently document any changes to the data, inventory boundary, methods, or any other relevant factors in the time series.
Relevance	Ensure the GHG inventory appropriately reflects the GHG emissions (and removals, if applicable) of the company and serves the decision-making needs of users – both internal and external to the company.
Transparency	Address all relevant issues in a factual and coherent manner, based on a clear audit trail. Disclose any relevant assumptions and make appropriate references to the accounting and calculation methodologies and data sources used.
Conservativeness (Land Sector and Removals Guidance)	Use conservative assumptions, values, and procedures when uncertainty is high. Conservative values and assumptions are those that are more likely to overestimate GHG emissions and underestimate removals, rather than underestimate emissions and overestimate removals.
Permanence (Land Sector and Removals Guidance)	Ensure mechanisms are in place to monitor the continued storage of reported removals, account for reversals, and report emissions from associated carbon pools.
Comparability (optional) (Land Sector and Removals Guidance)	Apply common methodologies, data sources, assumptions, and reporting formats such that the reported GHG inventories from multiple companies can be compared.