

Scope 3 Technical Working Group Meeting WORKING DRAFT; DO NOT CITE

Group C (Investments) Meeting 1 Introduction







November 7th, 2024



Meeting information



This meeting is recorded.



Please use the Raise Hand function to speak during the call.



You can also use the chat function in the main control.



Recording, slides, and meeting minutes will be shared after the call.



Notes to reader:

- The online version of this presentation is the official version
- All downloaded or printed material is uncontrolled
- This presentation should be read in conjunction with *Discussion Paper C.1*

Agenda

- Housekeeping (5 min)
- Governing bodies and decision-making (5 min)
- Scope of Work (10 min)
- Discussion Paper & Background (30 min)
- Issue 1: Applicability of scope 3, category 15 (30 min)
- Issue 2: Harmonization with PCAF (30 min)
- Time planning (5 min)
- Next steps (5 min)

Housekeeping

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Housekeeping

- TWG members should **not disclose any confidential information** of their employers, related to products, contracts, strategy, financials, compliance, etc.
- In TWG meetings, **<u>Chatham House Rule</u>** applies:
 - "When a meeting, or part thereof, is held under the Chatham House Rule, participants are free to use the information received, but neither the identity nor the affiliation of the speaker(s), nor that of any other participant, may be revealed."
- **Compliance and integrity** are key to maintaining the credibility of the GHG Protocol
 - Specifically, all participants need to follow the **conflict-of-interest policy**
 - Anti-trust rules have to be followed; please avoid any discussion of competitively sensitive topics*

Governing bodies and decision-making criteria



Remits of Governing Bodies* and the TWG

- Remits:
 - (SC ToR, 2.1.1): "The SC is a governing body with the mandate to provide strategic guidance on the mission, vision and goals of GHG Protocol, operating in the public interest and with the objective of maximizing its impact."
 - (ISB ToR, 2.1.1): "The ISB is a decision-making body within GHG Protocol, with the mandate to review and approve GHG Protocol Standards according to the GHG Protocol Standard Development and Revision Procedure, operating in the public interest and with the objective of maximizing the impact of GHG Protocol."
 - (TWG ToR, 2.1.1): "TWGs support the development of the technical content of GHG Protocol Standards according to the GHG Protocol Standard Development and Revision Procedure, operating in the public interest and with the objective of maximizing the impact of GHG Protocol."



Decision-Making Criteria

- <u>Evaluating options</u>: Describe the pros and cons of each option relative to each criterion. Qualitatively assess the degree to which an option is aligned with each criterion through a green (most aligned), yellow (mixed alignment), orange (least aligned) ranking system. Some criteria may be not applicable for a given topic; if so, mark N/A.
- <u>Comparing options</u>: The aim is to advance approaches that ideally meet all decision criteria (i.e., maximize the pros and minimize the cons against all criteria). If options present tradeoffs between criteria, the hierarchy should be generally followed, such that, for example, scientific integrity is not compromised at the expense of other criteria, while aiming to find a solution(s) that meet all criteria.

Decision-making criteria	Option A	Option B	Option C
1A. Scientific integrity	Pros	Pros	Pros
	Cons	Cons	Cons
1B. GHG accounting and reporting principles	Pros	Pros	Pros
	Cons	Cons	Cons
2A. Support decision making that drives ambitious global climate action	Pros	Pros	Pros
ZA. Support decision making that drives ambitious global cimate action	Cons	Cons	Cons
2B. Support programs based on GHG Protocol and uses of GHG data	Pros	Pros	Pros
2D. Support programs based on Ging Protocol and uses of Ging data	Cons	Cons	Cons
3. Feasibility to implement	Pros	Pros	Pros
	Cons	Cons	Cons

Note: This is a summary version. Read the full decision-making criteria included in the annex to the Governance Overview, available at: 11/1/2024 | 9 https://ghgprotocol.org/our-governance.



Standard setting language

- GHG Protocol standards use precise language to indicate which provisions of the standard are requirements, which are recommendations, and which are permissible or allowable options that companies may choose to follow.
- "Shall" indicates what is required to be in conformance with the standard.
- "**Should**" indicates a recommendation, but not a requirement.
- "May" indicates an option that is permissible or allowable.

Scope of Work





Key topics – Q4 of year 2024

- These are the key topics scheduled for consideration in the **first three meetings**
- Refer to **slide 48** for the **meeting dates and times**
- Sections below correspond with sections in the *Discussion Paper C.1*

Meeting	Section*	Issue
C.1	N/A	Kick-off introduction to Discussion Paper C.1
C.2	8.1	Applicability of scope 3, category 15 for financial institutions (FIs) vs. non-FIs**
	8.2	Harmonization with Partnership for Carbon Accounting Financial (PCAF)
C.3	8.3	Classification and nomenclature of investments
	8.4	Other investments/asset types

* These sections correspond with sections in *Discussion Paper C.1 – Investments* (available online) ** This is a retitling of issue 1 from the first presentation ("Scope 3 – Meeting TWG1 Presentation – 20241017")





Key topics (continued) – first half of year 2025

Meeting	Section*	Issue
C.4 & C.5	8.5	Minimum boundaries
	8.6	Relevant scope 3 emissions of investments (investees)
	8.7	Lifetime emissions of projects
C.6 & C.7	8.8	Facilitated emissions
	8.9	Insurance-associated emissions
C.8	8.10	Calculation method (for optional investments)
	8.11	Private/unlisted equity or debt (known uses)
C.9	8.12	Listed equity or debt (with unknown uses)
	8.13	Sovereign debt
	8.14 & 8.15	Revenue- or spend-based method & Portfolio rollups**

* These sections correspond with sections in *Discussion Paper C.1 – Investments* (available online)

** Listed together for no reason except to accommodate slide space/formatting.



Key topics (continued) – mid-year 2025

Meeting	Section*	Issue
C.10	N/A	Licensed IP/products/services classification, minimum boundary, and quantification requirements.
C.11	N/A	(continued)



Note on scheduling

- This Group may resolve topics/issues faster or slower than scheduled; as such
- The meeting schedule herein may change during the update process

Discussion Paper & Background



Notes on terminology and acronyms*

- The glossary of key terms (Table 2.1) in *Discussion Paper C.1* intentionally includes definitions from:
 - GHG Protocol Scope 3 Standard
 - PCAF *Financed Emissions Standard* (Part A, second edition)
 - IFRS S2 Climate-related Disclosures
- Discussions may involve using/referencing language from multiple standards and frameworks, including:
 - GHG Protocol *Scope 3 Standard* (2011)
 - Financed Emissions Standard (PCAF, 2023) (Part A), Facilitated Emissions Standard (PCAF, 2022) (Part B), Insurance-Associated Emissions Standard (PCAF, 2022) (Part C)
 - IFRS, ESRS E1, SBTi, GRI, CDP, IIGCC, etc.*
- The term "**company**" is generally used to refer to all types of organizations unless explicitly stated otherwise (including financial and non-financial institutions, and public and private organizations)
- The term non-financial institution ("**non-FIs**") includes any organization that is not a financial institution



Note on options

Options presented in this presentation, future presentations, and/or in any discussion paper(s) may not
reflect all possible options discussed, nor the final specifications or edits for a chosen option(s), to resolve
an identified issue.



Discussion Paper C.1

• *Discussion Paper C.1* will be made available online.



Background: Market since 2011

- In just the past four years, the number of companies submitting climate disclosures to CDP more than doubled from 9,526 in 2020 to 23,202 in year 2023 (CDP, 2023a)¹
 - However, only 37% of the 377 Financial Services companies included in a recent 2021 CDP climate change questionnaire on behalf of investors reported category 15 as relevant (despite this category accounting for approximately 99% scope 3 *and* total scope 1, 2, and 3 emissions of said companies) (CDP, 2023b)²
- Meanwhile, 532 FIs listed on PCAF's website are or have committed to disclosing scope 3 category 15 emissions using PCAF (<u>https://carbonaccountingfinancials.com/financial-institutions-taking-action</u>)
- Finally, mandatory disclosures (including ESRS E1 and IFRS S2), which require undertakings to account for the climate-risk associated with scope 3 category 15 emissions, if material, it is expected, will include many companies currently disclosing or committing to disclosing with CDP and/or PCAF



Background: First edition (PCAF, 2020) conformance with GHG Protocol

- The GHG Protocol in year 2020 reviewed the first edition of *Financed Emissions Standard*, Part A (PCAF, 2020) and determined it to be in **conformance** with the requirements of the *Scope 3 Standard*
- (PCAF, 2020) is posted on the GHG Protocol website with the **Built on GHG Protocol** mark
- Revisions to (PCAF, 2020) made in the second edition, including Part B and Part C, have *not* been reviewed by GHG Protocol for conformance



Background: Comparison of GHG Protocol and PCAF*

Item	Scope 3 Standard	PCAF standards**
Scope 3 category	All fifteen categories	Only category 15
Users	All organizations (FIs and non-FIs)	<u>Only</u> FIs
Required investments	 Equity, Debt (known uses), and Project finance 	 Financed emissions (Part A): Listed equity, Corporate bonds, Unlisted equity, Business Ioans, Project finance, Commercial Real Estate, Mortgages, Motor vehicle Ioans, and Sovereign debt; Facilitated emissions (Part B); and Insurance-associated emissions (Part C)
Optional investments	 Debt (unknown uses) Managed investments and client services (including 'facilitated') Other investments (including 'insurance') 	N/A
Calculation methods	Specified only for required investments	Specified for all investments

* Refer to Table 8.1.1 of *Discussion Paper C.1* and appendices therein for a complete comparison of the standards ** PCAF standards throughout this presentation (and in *Discussion Paper C.1*) includes Part A, Part B, and Part C 11/1/2024 | 22



Background: Comparison of GHG Protocol and PCAF* (continued)

Item	Scope 3 Standard	PCAF standards**
Principles	Completeness, Consistency, Relevance, Accuracy, and Transparency	Identical
GHGs and GWPs	Kyoto seven	Identical
Avoided emissions	N/A (record separately)	Identical
Removals	 N/A (record separately); The Land Sector and Removals Standard will stipulate requirements (released expected Q1 2025) 	 Recorded separately (<i>identical</i>) Different quantification requirements (possibly)
Consolidation approaches	Operational controlFinancial controlEquity share	 Operational control Financial control Not Equity share
Data quality score	N/A	Data quality scores (hierarchy) by calculation method and data source(s), for each asset type

* Refer to Table 8.1.1 of *Discussion Paper C.1* and appendices therein for a complete comparison of the standards ** PCAF standards throughout this presentation (and in *Discussion Paper C.1*) includes Part A, Part B, and Part C

Issue 1: Applicability of scope 3, category 15





Issue 1: Applicability of scope 3, category 15

• Description of issue:

- Clarify whether category 15 is applicable for both
 - Financial institutions (FIs) and
 - Non-financial institutions (non-FIs)

Notes on terminology:

- Financial institutions (as defined by PCAF): "A company engaged in the business of dealing with financial and monetary transactions such as deposits, loans, investments, and currency exchange... including commercial banks, investment banks, development banks, asset owners/managers (mutual funds, pension funds, close-end funds, investment trusts), and insurance companies."
- Non-financial institution: An organization that is not a financial institution
 - Important: this term is *not* defined in the GHG Protocol *Scope 3 Standard* or *Technical Guidance*



Current text

- **GHG Protocol:** Category 15 of the *Scope 3 Standard* is designed for both FIs and non-FIs (Ch. 5, p. 51):
 - Category 15 is "... designed primarily for private... [and] public financial institutions..."
 - Category 15 is "...applicable to investors... and companies that provide financial services... and other entities with investments [emphasis added] not included in scope 1 and scope 2."
 - Category 15 includes subsidiaries, associated companies, and joint ventures not accounted for (or reported) by a reporting company (including non-FIs) in scope 1 or scope 2 (Ch. 5, Table 5.9)
- PCAF:
 - As "... a financial industry-led initiative... PCAF developed the Global GHG Accounting and Reporting Standard for the Financial Industry..."
 - The financial industry includes **banks**, **investors**, **and fund managers**



Current text (continued)

GHG Protocol: The *Scope 3 Standard* details the applicability of category 15 for the following entity types:

- FIs:
 - Investors (firms)
 - Financial services (firms)
 - Private financial institutions (e.g. commercial banks)
 - Public financial institutions
 - Development banks
 - Export credit agencies
- Non-FIs:
 - "... other entities with investments not included in scope 1 and scope 2" (Scope 3 Standard, p. 52)
 - Including equity investments in subsidiaries, associated companies, and/or joint ventures



Options*

- **Option 1:** Make clear that both FIs and non-FIs **shall** disclose *significant* category 15 emissions
 - Note: the topic/issue of significance thresholds (e.g., 5%) is being considered by Group B of the scope 3 TWG and will be considered by Group C for category 15-specific application in C.4 & C.5 alongside minimum boundary considerations.
- **Option 2:** In addition to Option 1, provide different requirements for FIs and only large-cap non-FIs (which **shall** disclose) versus small-cap/SME non-FIs (which **may** disclose)
 - This distinction may be addressed via different minimum boundaries for investment types



Discussion prompts

- 1. Should FIs/non-FIs have different requirements?
 - What are the pros and cons of this based on the decision-making criteria?
- 2. Is it simpler to use an entity-type-agnostic significance threshold to determine inclusion?
 - E.g., 5%?
- 3. Should FIs have a different recommendation ("**should**" or "**may**" language) to use the PCAF standards for preparing scope 3 category 15 emissions inventories?*
 - Should non-FIs be required ("shall" language) to use only the Scope 3 Standard for preparing category 15 emissions inventories or be given the option to use PCAF standards?*
- 4. Are there other considerations that need to be factored into this discussion?

^{*} All considerations and recommendations made by the TWG and the Secretariat will be reviewed, approved, and ratified by 11/1/2024 | 29 the ISB and SC in accordance with the Governing Documents, including interoperability with third-party standards.

Issue 2: Harmonization with PCAF





Issue 2: Harmonization with PCAF

• Description of issue:

 Review harmonization of the requirements and guidance between the GHG Protocol Scope 3 Standard and PCAF's recently updated and published standards*



Non-investment-specific (general) topics

- The following include non-investment specific (general) related topics that concern harmonizing requirements between the GHG Protocol and PCAF
- Some requirements listed* below are already harmonized and are included for the sake of completeness
 - Refer to the table on **slide 25** in this presentation for a comparison
 - 2.1 Accounting and reporting principles
 - 2.2 Greenhouse gases
 - 2.3 Avoided emissions
 - 2.4 Removals
 - 2.5 Consolidation approaches
 - 2.6 Data quality score



2.1 Accounting and reporting principles

• Already harmonized:

- PCAF standards currently conform with the existing GHG Protocol accounting and reporting principles
- Cross-cutting item(s):
 - The Corporate Standard workstream at the GHG Protocol is considering maintaining, redefining, removing, and/or adding (new) accounting and reporting principles
 - The Land Sector and Removals Standard by GHG Protocol includes three new principles
 - Conservativeness and permanence are required for removals accounting; and
 - Comparability is recommended for emissions and removals accounting when relevant



2.2 Greenhouse gases and GWPs

- Already harmonized:
 - PCAF standards currently conform with existing GHG Protocol greenhouse gas and GWP requirements
- Cross-cutting item(s):
 - The Corporate Standard workstream at the GHG Protocol is considering changing the number of greenhouse gases (GHGs) required and/or which global warming potential (GWP) values reporting organization may use to quantify GHG emissions



2.3 Avoided emissions

• Already harmonized:

 PCAF standards currently conform with existing GHG Protocol requirements to record avoided emission values separately from a scope 3 inventory



2.4 Removals

• Needs harmonizing:

 PCAF standards need to conform with requirements regarding removals from the Land Sector and Removals Standard by GHG Protocol (expected in Q1 of year 2025)



2.5 Consolidation approaches

• May need harmonizing:

- Consider whether the GHG Protocol Corporate Standard and Scope 3 Standard should not permit the equity share approach for FIs and/or non-FIs that report scope 3 category 15 emissions
- Current standard approach:
 - **GHG Protocol:** (Table 5.9, Accounting for emissions from investments, *Scope 3 Standard*, p. 53):
 - "In general, companies in the financial services sector **should** [emphasis added] account for emissions from equity investments in scope 1 and scope 2 by using the **equity share** [emphasis added] consolidation approach to obtain representative scope 1 and scope 2 inventories."

– PCAF standards:*

- "... shall use the operational... or... financial control approach; as a result, all financed emissions shall be accounted for in their scope 3 category 15" by all FIs that conform with PCAF (Part A, p. 123)
- "This requirement eliminates inconsistencies in accounting that could arise from using the equity share approach, which would require scope 1 and 2 emissions from... equity investments to be reported under the financial institution's scope 1 and 2 emissions (according to its share of equity...)" (Part A, p, 37)



2.5 Consolidation approaches (continued)

Note: The Corporate Standard TWG is addressing updates to consolidation approaches across all GHG Protocol corporate standards. The views from the scope 3 TWG will be provided to the Corporate Standard workstream.

- Options:*
 - Option 1: GHG Protocol makes no change to consolidation approach rules, nor any exceptions for FIs and/or non-FIs, in the *Scope 3 Standard*
 - Option 2: GHG Protocol adopts PCAF's approach to not permit the equity share consolidation approach for FIs that comply with the *Scope 3 Standard*
 - Option 3: GHG Protocol adopts PCAF's approach to not permit the equity share consolidation approach for FIs and non-FIs that account for category 15 emissions



2.5 Consolidation approaches (continued)

Discussion Prompts:

- 1. Option 2 would reflect a departure from existing *Scope 3 Standard* language in Table 5.9 (p. 52):
 - "... the financial services sector **should** [emphasis added] account for emissions from equity investments in scope 1 and scope 2 by using the **equity share** [emphasis added]..."
- 2. Should FIs/non-FIs have different requirements?
 - What are the pros and cons of this based on the decision-making criteria?
- 3. What implications could different consolidation approaches of investees have on aggregate portfolio emissions?
 - Note that the topic of portfolio rollups, 8.15, is scheduled for consideration in meeting C.9
 - Note that the topic of consolidation approaches across the suite of GHG Protocol corporate standards is being considered by the Corporate Standard workstream



2.6 Data quality score

Consider harmonizing:

- Consider harmonizing a data quality scoring methodology between the GHG Protocol Scope 3 Standard (and/or corporate standards generally) and PCAF's Financed Emissions Standard (Part A)
- Current standard approach:
 - GHG Protocol:
 - N/A
 - PCAF standards:*
 - Refer to footnotes in the series of **Appendices B9** in *Discussion Paper C.1* for a summary of data quality score by calculation methodology for each asset type (as stipulated by PCAF)
 - Alternatively, refer to Annex 10 (PCAF, Part A, 2022, p. 142-148) for Detailed data quality score tables per asset class





2.6 Data quality score (continued)

• GHG Protocol calculation methods:

- Generally, the "investment-specific" and "average-data" method are listed in order of priority (*Technical Guidance*)
- However, depending on the data quality used for calculations, this may not always be the case for all
 organizations (refer to the series of Appendices B9 in Discussion Paper C.1

• Example of a *potential* weakness of PCAF's data quality score:

- A data quality score of 1 *could* correspond with the use of calculation methods that *should* receive a data quality score of 4 (using PCAF's data quality score)
- For example, an investee using the average-data method (a revenue-based calculation in the Scope 3 Standard) would yield a score of 1 for these results, if verified for GHG Protocol compliance; thus
- A financial institution using PCAF's data quality score *could* receive a score of 1 (for said investees' GHG Protocol-verified results) relying on a revenue-based method that *should* receive a score of 4
- For more, refer to section 8.2.6 of *Discussion Paper C.1*



2.6 Data quality score (continued)

Note: Group A of the Scope 3 TWG is addressing data quality and calculation methods throughout the Scope 3 Standard, and this will extend to data quality scoring and/or hierarchies. Feedback from this Group C will be shared with discussions by Group A concerning data quality.

Options:*

- **Option 1:** PCAF and GHG Protocol to maintain different data quality requirements
 - Consider recommending changes to the PCAF data scoring hierarchy to remove the potential for scope 4 revenue-based calculations methods to, inadvertently, receive a score of 1
- Option 2: PCAF to adopt and/or conform with scope 3 revision changes concerning data quality requirements, including a potential data quality hierarchy, which may be developed by the GHG Protocol during the update process
- Option 3: GHG Protocol to adopt PCAF's data quality scoring methodology and guidance in the *Scope* 3 Standard for, exclusively, category 15 investments (for FIs and non-FIs)

^{*} Options presented in this presentation may not reflect all possible options discussed nor the final specifications thereof. 11/1/2024 | 42



2.6 Data quality score (continued)

Note: Group A of the Scope 3 TWG is addressing data quality and calculation methods throughout the Scope 3 Standard, and this will extend to data quality scoring and/or hierarchies. Feedback from this Group C will be shared with discussions by Group A concerning data quality.

Discussion Prompts:

- 1. Should GHG Protocol consider a unique data quality score for category 15?
 - Or develop a consistent data quality score for all scope 3 categories?
- 2. Is it sensible to require a different data quality scoring system for investors?
- 3. Should scope 3 categories 1 through 14 feature a different data quality score versus 'financed' scope 3 emissions (category 15)?

Time planning



Way of working: Meeting times strive to be convenient and inclusive

- 'Reasonable' meeting hours are defined as 6am to 10pm
 - Goal 1: maximize comfortable meeting hours for as many TWG members as possible, over the course of the standard setting/revision process
 - Goal 2: do not systematically place some members into uncomfortable working hours



Meeting time survey outcomes

- Data as of 31 October
- Participation: 11 responses
- Morning ET works best, Evening ET works least
- Default meeting time: 9-11am ET

Which meeting time could you commit to for all phase 1 meetings in your sub-group going forward (through June 2

10

10

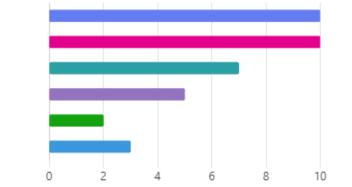
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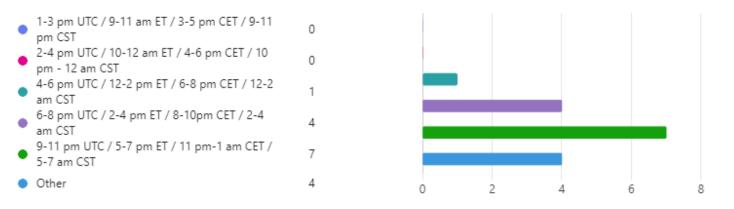
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- 1-3 pm UTC / 9-11 am ET / 3-5 pm CET / 9-11 pm CST
 2-4 pm UTC / 10-12 am ET / 4-6 pm CET / 10 pm - 12 am CST
 4-6 pm UTC / 12-2 pm ET / 6-8 pm CET / 12-2 am CST
 6-8 pm UTC / 2-4 pm ET / 8-10pm CET / 2-4
- am CST 9-11 pm UTC / 5-7 pm ET / 11 pm-1 am CET
- / 5-7 am CST
 Other



Which meeting time can you not commit to for any subgroup meetings?





Meeting dates and times (to be confirmed)

• Confirm Meeting C.1 on November 27th and confirm 9-11am EST for all meetings.

Group C						
Meeting	Date	Time				
1	17 Oct 2024 Thu	06:00 PT	09:00 ET	15:00 CET	18:30 IST	00:00 AET
C.1	07 Nov 2024	06:00 PT	09:00 ET	15:00 CET	19:30 IST	00:00 AET
C.2	27 Nov 2024	06:00 PT	09:00 ET	15:00 CET	19:30 IST	01:00 AET
C.3	19 Dec 2024	06:00 PT	09:00 ET	15:00 CET	19:30 IST	00:00 AET
C.4	23 Jan 2025	06:00 PT	09:00 ET	15:00 CET	19:30 IST	01:00 AET
C.5	13 Feb 2025	06:00 PT	09:00 ET	15:00 CET	19:30 IST	01:00 AET
C.6	06 Mar 2025	06:00 PT	09:00 ET	15:00 CET	19:30 IST	00:00 AET
C.7	27 Mar 2025	06:00 PT	09:00 ET	14:00 CET	19:30 IST	00:00 AET
C.8	17 Apr 2025	06:00 PT	09:00 ET	15:00 CET	18:30 IST	00:00 AET
C.9	08 May 2025	06:00 PT	09:00 ET	15:00 CET	19:30 IST	00:00 AET
C.10	29 May 2025	06:00 PT	09:00 ET	15:00 CET	18:30 IST	23:00 AET
C.11	19 Jun 2025	06:00 PT	09:00 ET	15:00 CET	18:30 IST	23:00 AET

Next steps





Next steps

- GHG Protocol Secretariat:
 - November 7th Distribute **Discussion Paper C.1** (to be presented in meeting C.1)
 - November 8th Distribute the **Recording** (within one day)
 - November 14th Distribute **Meeting Minutes** and the **Feedback Form** (within five days)
- Next meeting:
 - November 27th Meeting C.2 (to be confirmed)



Thank you!

Natalia Chebaeva Scope 3 Manager, WBCSD <u>chebaeva@wbcsd.org</u>

Alexander Frantzen Scope 3 Manager, WRI <u>alexander.frantzen@wri.org</u>

Claire Hegemann Scope 3 Associate, WRI claire.hegemann@wri.org

