

Greenhouse Gas Protocol

Complaints and Concerns Procedure

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1. Introduction

1.1 Definitions

- 1.1.1 “Co-Hosts” refers to the co-hosts of Greenhouse Gas (GHG) Protocol, i.e., World Resources Institute (WRI) and World Business Council for Sustainable Development (WBCSD). GHG Protocol is an unincorporated joint initiative of WRI and WBCSD.
- 1.1.2 “Complaint” is a formal expression of dissatisfaction by a stakeholder expressed directly to GHG Protocol about actions taken or a lack of action, where a response or resolution is explicitly or implicitly expected or legally required.
- 1.1.3 “Concern” is an expression of worry or doubt over an issue considered to be important, for which reassurances are sought. Concerns can generally be resolved without major or urgent change to any normative documents or responsibilities.
- 1.1.4 “GHG Protocol” describes the partnership established between the Co-Hosts to work with academia, businesses, governments, industry associations, nongovernmental organizations and others to develop the most credible, accessible and widely used GHG accounting and reporting standards and to actively support their global adoption and implementation in order to enable all private and public entities to account for and reduce their GHG emissions in line with the global warming limits required by science.
- 1.1.5 “Independent Standards Board” (ISB) describes the body that oversees the standards development process, including but not limited to advising the GHG Protocol Steering Committee (SC) on the need for, objectives and scope of new and/or revised standards, reviewing and approving GHG Protocol Standards according to the GHG Protocol Standard Development and Revision Procedure, appointing Technical Working Group (TWG) members, and making decisions related to the content of standards.
- 1.1.6 “Secretariat” describes the body that runs the day-to-day activities of GHG Protocol, including but not limited to drafting standards and supporting the SC and ISB with meetings and documentation.
- 1.1.7 “Standard” describes any normative document informed by subject matter experts and approved by GHG Protocol governance bodies that provides guidance on the accounting of GHG emissions and supports implementation.
- 1.1.8 “Steering Committee” describes the body that provides strategic guidance on the goals and direction of GHG Protocol, including advising the Co-Hosts on the optimal organizational set-up and governance structure. It approves the GHG Protocol strategy, including its overarching mission, vision, short- and long-term strategic goals, appoints ISB members, decides whether new standards or revisions are needed, and ratifies the decisions of the ISB to publish final standards.
- 1.1.9 “Technical Working Groups” are the multi-stakeholder bodies that support the development of GHG Protocol Standards’ technical content according to the GHG Protocol Standard Development and Revision Procedure

1.2 Abbreviations

The following abbreviations are used in this document:

DC	Donor Council
GHG	Greenhouse Gas
GHG Protocol	Greenhouse Gas Protocol
ISB	Independent Standards Board
SC	Steering Committee
ToR	Terms of Reference
TWG	Technical Working Group
WBCSD	World Business Council for Sustainable Development
WRI	World Resources Institute

1.3 About this document

- 1.3.1 This Complaints and Concerns Procedure (“Procedure”) outlines the procedures for handling complaints made against the GHG Protocol and concerns raised by stakeholders.
- 1.3.2 The Procedure also describes the process that will be followed by the GHG Protocol to respond to and manage complaints.
- 1.3.3 It furthermore outlines a process for how to deal with concerns raised by stakeholders.
- 1.3.4 All procedures shall apply from the time this document is approved, without retrospective effect on any ongoing complaints or concerns related to the development or revision of standards.
- 1.3.5 Further details on the different GHG Protocol governance bodies and their activities and roles within this context can be found in the *GHG Protocol Governance Overview* and applicable Terms of Reference (ToRs).
- 1.3.6 This document is the intellectual property of the GHG Protocol Co-Hosts and is approved by the GHG Protocol Steering Committee (SC), supported by advice from the Independent Standards Board (ISB) and GHG Protocol Secretariat (Secretariat). All rights, title and interests in and to this procedure are owned exclusively by the Co-Hosts.
- 1.3.7 The latest version of this document will be made publicly available on the GHG Protocol website and shall supersede any previous versions thereof. It is the user’s responsibility to check that any printed copies correspond to the current version.

2. Scope and criteria for complaints

2.1 Scope

- 2.1.1 This Procedure applies to complaints relating to the development, revision, content or any other aspects of the GHG Protocol’s standards. This Procedure also applies to concerns on representation within the standard development process, including adherence to the Standard Development and Revision Procedure and Terms of Reference for GHG Protocol’s governance and advisory bodies]
- 2.1.2 This Procedure does not cover
 - i. Complaints which relate to GHG Protocol Secretariat members and any other parties working with or on behalf of the GHG Protocol, including volunteers and

- those who perform work for or represent the GHG Protocol through consulting or other services.
- ii. Complaints which relate to GHG Protocol's commercial products or services.
- iii. Complaints from GHG Protocol employees, who should refer to the appropriate internal policies of the respective Co-Hosts.

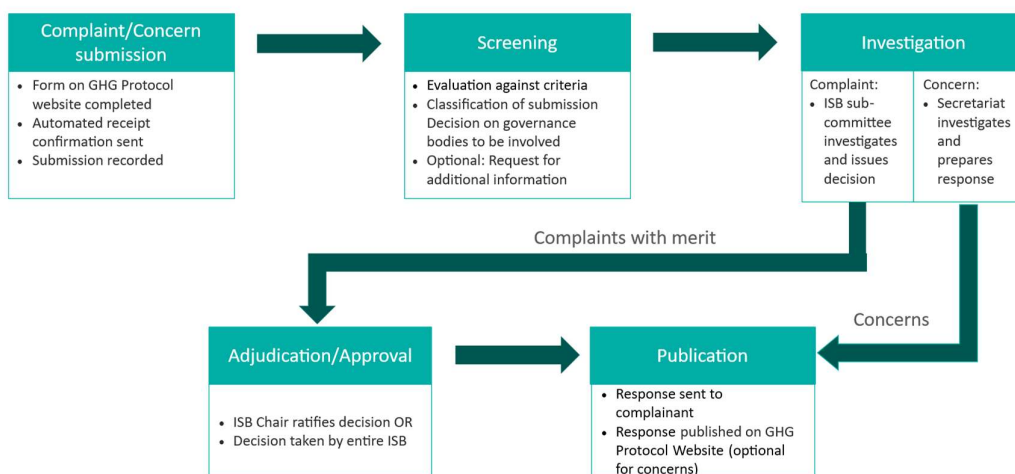
2.2 Criteria for complaints with merit

Complaints are deemed to have merit if they meet at least one of the following criteria:

- 2.2.1 The complaint alleges (a) specific deviation(s) from GHG Protocol due process, as described in the *GHG Protocol Standard Development and Revision Procedure* or *Technical Working Groups Terms of Reference*, that can be substantiated with direct evidence. Examples include but are not limited to:
- i. Inadequate stakeholder engagement (e.g., lack of sufficient balance or diversity in TWG composition, failure to conduct required public consultations).
 - ii. Deviation from established decision-making criteria.
 - iii. Non-transparent decision-making, including lacking documentation of decisions.
- 2.2.2 The complaint identifies a factual error, outdated scientific assumption, or methodological flaw that can be substantiated with peer-reviewed literature or authoritative sources. Examples include but are not limited to:
- i. Use of outdated global warming potentials (GWPs).
 - ii. Methodologies that are inconsistent with IPCC guidelines.
- The complaint alleges inappropriate conduct by a specific member or specific members of a governance body (e.g., ISB or SC) that could result in a real or perceived threat to the GHG Protocol's credibility.

2.3 Process flow

Submissions will be processed according to the following workflow:



3. Submission and Initial Evaluation

3.1 Submission of complaints

- 3.1.1 Any stakeholder or person has the right to submit a formal complaint with merit, as described in Section 3.1. All parties are encouraged to raise a complaint as soon as they perceive that an alleged breach or other negative action has occurred.
- 3.1.2 All complaints must be submitted in writing via the form available on the GHG Protocol website at www.ghgprotocol.org/contact-us.
- 3.1.3 The complaint should be as clear and detailed as possible. Complaints must include the following:
 - i. Name and contact information of the complainant;
 - ii. Description of the issue, including references to specific standards or procedures;
 - iii. Evidence or justification supporting the complaint;
 - iv. Desired outcomes or corrective actions sought.
- 3.1.4 If the complaint alleges a specific deviation(s) from GHG Protocol due process, the complaint or a summarized nature of the complaint, together with the name of the complainant, if available, shall be posted on the GHG Protocol website. The posting of a complaint shall happen within the timeline outlined in section 4.5.
- 3.1.5 Anonymous complaints may be considered at the discretion of the Secretariat if a clear rationale for anonymity and sufficient evidence supporting the complaint are both provided.
- 3.1.6 Upon specific request by a complainant, that complainant's name may be kept confidential at the discretion of the Secretariat.

3.2 Initial evaluation of complaints

- 3.2.1 Upon receipt, The Secretariat shall take the following actions:
 - i. Acknowledge receipt of each complaint within 5 working days.
 - ii. Record the complaint and its supporting information in a dedicated complaints register. This recorded information will be kept for five years. Data Protection and Right to Privacy will be maintained following applicable regulations.
- 3.2.2 The Secretariat shall conduct an initial screening to determine whether the submission contains the requisite information, including evidence or justification supporting the complaint, has been provided to sufficiently inform further action.
- 3.2.3 If the complaint lacks sufficient information, the Secretariat shall inform the complainant and request additional information.
- 3.2.4 If the complaint is outside the scope of this Procedure, the Secretariat shall inform the complainant, and no further action under the Procedure will be taken.
- 3.2.5 If the complaint is determined to be a concern, the Secretariat shall process it according to the procedures in Section 5.4.
- 3.2.6 In conducting initial screening,
 - i. The Secretariat shall liberally escalate to the ISB or a dedicated ISB sub-committee as described in section 5 when there is uncertainty or where failure to do so could result in a real or perceived threat to the GHG Protocol's credibility.

- ii. The Secretariat shall promptly communicate the outcome with justification to the complainant along with a description of next steps. The complainant may resubmit such complaints at a later date with new or more detailed information if desired.
- 3.2.7 After initial screening, the Secretariat shall prepare a summary of the complaint with relevant information for evaluation by the ISB, or if applicable, a dedicated ISB subcommittee.

4. Investigation, adjudication and response

Complaints with merit shall undergo investigation and adjudication with separate procedures based on the type of complaint:

4.1 Complaints regarding deviations from due process

- 4.1.1 A dedicated ISB subcommittee, consisting of at least four members including the Chair of the ISB, shall investigate complaints regarding deviations from *GHG Protocol Standard Development and Revision Procedure* or *Technical Working Groups Terms of Reference*.
- 4.1.2 At the request of the ISB subcommittee, it shall be supported by the Secretariat. The Secretariat will prepare working documents, assist the Chair of the ISB, or if applicable Chair of the dedicated ISB subcommittee, in facilitating deliberation and serve as secretary to convene meetings, if necessary, and capture minutes and decisions.
- 4.1.3 The decision and proposed remedy for a due process complaint shall be determined by consensus. If consensus cannot be reached, as determined by the Chair, it shall be determined by majority vote of the applicable subcommittee of the ISB.
- 4.1.4 The Chair of the ISB will then be required to ratify the decision of the subcommittee.
- 4.1.5 Only in such cases where the Chair of the ISB is unable or unwilling to ratify the decision of the subcommittee shall the matter be brought to the entire ISB for resolution pursuant to the decision-making procedures in the ISB ToR.

4.2 Complaints regarding Scientific or Technical accuracy

- 4.2.1 Members of the Secretariat shall be responsible for investigating the submission, preparing the response to the complainant.
- 4.2.2 Any corrective action will be taken according to the *Standards Development and Revision Procedure*.

4.3 Complaints against members of the ISB or the SC

- 4.3.1 If a complaint accuses a member of the ISB, including its Chair, and, if applicable Vice Chair, of misconduct or breach of applicable ToRs or procedures, the complaint shall be forwarded to the SC Chair for adjudication.

- 4.3.2 In exceptional circumstances, for instance if a complaint is about the SC Chair or a SC member, the Secretariat may put an alternative procedure in place and will inform the complainant of the reason and the alternative procedure.

4.4 Concerns

- 4.4.1 Members of the Secretariat shall:
- i. Consider the concern and determine an appropriate response. If necessary, the Secretariat may consult with the ISB Chair or SC Chair and/or the ISB and SC.
 - ii. Inform the party submitting the concern of the response and the reason for the response chosen.
 - iii. Log the concern and response, and if appropriate use as input to (future) revision of GHG Protocol Standards and procedures.
 - iv. The Secretariat may choose to publish the response.
- 4.4.2 If the party submitting the concern is not satisfied with the response, they may escalate the concern to a formal complaint, in which case the “complaint with merit” procedure will be followed.

4.5 Response time

- 4.5.1 Adjudication and response to the complainant shall not take longer than 20 working days starting upon filing of the complaint. In certain circumstances, a response may notify the complainant of an extended timeline to resolution accompanied by justification for the delay (e.g., deeper investigation needed, extenuating circumstances, lack of ISB or Secretariat availability or capacity, etc.) and a good faith estimate of the expected resolution date.
- 4.5.2 The response to a complaint with merit will be published on the GHG Protocol website.
- 4.5.3 The same period of 20 working days accounts for concerns.

4.6 Informing of ISB and SC

- 4.6.1 Both the ISB and SC shall be regularly informed by the Secretariat on the type and content of complaints and concerns received and their adjudication/response.

5. Interpretation of governing documents

- 5.1.1 The GHG Protocol governance structures and processes to develop, revise and approve any standards owned, published and maintained by GHG Protocol are governed by the ToRs, procedures and related documents, collectively referred to as the “Governing Documents,” as detailed in the *GHG Protocol Governance Overview*.
- 5.1.2 These documents shall be interpreted together as a whole and not separately. In the event of any conflict or inconsistency between the provisions of any of the Governing Documents, the provisions shall be interpreted in a manner that best supports the overall governance and objectives of GHG Protocol, to the fullest extent possible. Where necessary, any questions of interpretation should be referred to the body responsible for approving the respective ToR or document.