

# **Corporate Standard Technical Working Group**

Subgroup 1, Meeting #9

#### **GHG Protocol Secretariat team:**

Iain Hunt, Hande Baybar, Allison Leach







# **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.

# **Agenda**

Introduction and housekeeping

10 minutes

 Review full TWG and ISB feedback on phase 1 outcomes 15 minutes

Follow up on base year recalculation policy

15 minutes

Options for when data unavailable for base year recalculation

70 minutes

Wrap up and next steps

10 minutes







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## **Housekeeping: Guidelines and procedures**

- We want to make **TWG meetings a safe space** our discussions should be open, honest, challenging status quo, and 'think out of the box' in order to get to the best possible results for GHG Protocol
- Always be respectful, despite controversial discussions on content
- TWG members should not disclose any confidential information of their employers, related to products, contracts, strategy, financials, compliance, etc.
- In TWG meetings, **Chatham House Rule** 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 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\*



## **Zoom logistics and recording of meetings**

#### **Zoom Meetings**

- All participants are muted upon entry
- Please turn on your video
- Please include your full name and company/organization in your Zoom display name





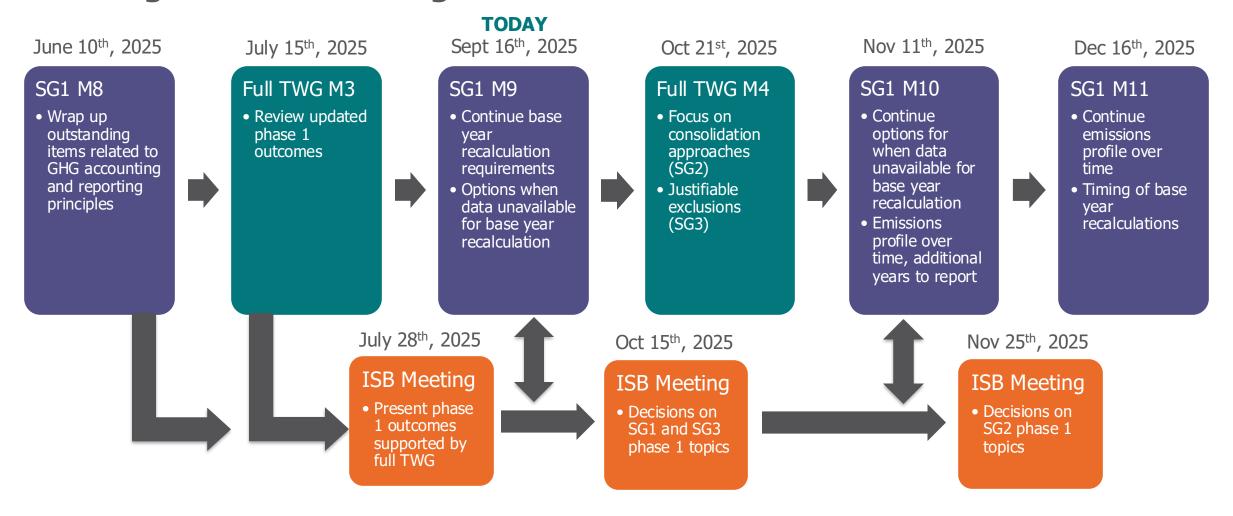
#### Meetings will be recorded and shared with all TWG members for:

- Facilitation of notetaking for Secretariat staff
- To assist TWG members who cannot attend the live meeting or otherwise want to review the discussions

Recordings will be available for a limited time after the meeting; access is restricted to TWG members only.



#### Meetings schedule through end of 2025





# **Today's objectives**

- 1. Review feedback from full TWG on **phase 1 outcomes**
- 2. Follow up on base year recalculation policies and significance thresholds
- 3. Consider options that should be available for companies for **base year recalculation when sufficient data unavailable**

**Today's primary objective** 



## **Subgroup 1, Phase 2: Tracking emissions over time**

Relevant chapters: chapter 5 (Tracking Emissions Over Time), chapter 8 (Accounting for GHG Reductions), chapter 11 (Setting GHG targets)

- D.1. Updates to requirements and guidance for **selecting a base year**.
- D.2. Updates to requirements and guidance for developing a **base year recalculation policy** and defining a **significance threshold** and related disclosure requirements.
- D.3. Revisit **optionality of reporting emissions for all years included in a GHG statement** in addition to the base year to enable tracking of an emissions profile over time.
- D.4. Integration and update of **2005 amendment** "Base Year Recalculation Methodologies for Structural Changes" (Appendix E).
- D.5. Additional **guidance for estimating base year emissions** for acquired assets where records of emissions activities are limited or non-existent.
  - D.6. Revisit **reporting requirements for base year recalculation** including whether changes due to structural changes versus methodological changes should be reported separately.
  - D.7. Requirements and guidance for tracking emissions intensity metrics over time.
  - D.8. Additional guidance on how to appropriately disclose the **reason(s) for changes in emissions over time**.
  - D.9. Updates to **target-setting guidance** to bring up to date and facilitate interoperability with target setting programs (including SBTi).

Corporate Standard Development Plan, Section 5: Scope of work for the standard revision



# **Full TWG Preliminary Outcomes: Subgroup 2**

Topic	Preliminary outcome from Full TWG feedback survey	Next steps
Phase 1: Financial control approach revision	<ul> <li>Majority support for the reference text as the direction for revising the financial control approach.</li> </ul>	<ul> <li>Preliminary outcomes were shared with ISB in July</li> <li>ISB feedback survey in progress</li> </ul>
Phase 1: Operational control approach revision	<ul> <li>Majority support for the reference text as the direction for revising the definition of operational control.</li> </ul>	<ul> <li>Preliminary outcomes were shared with ISB in July</li> <li>ISB feedback survey in progress</li> </ul>
Phase 1: Optionality in consolidation approaches	<ul> <li>Majority support for maintaining optionality in consolidation approaches in the Corporate Standard. The level of support was lower than the full TWG Meeting 2 outcomes.</li> </ul>	<ul> <li>Preliminary outcomes were shared with ISB in July</li> <li>ISB feedback survey in progress</li> </ul>

An open discussion meeting on consolidation approaches will be held on Wednesday, September 17<sup>th</sup> (08:00-10:00 ET / 14:00-16:00 CET). All Corporate Standard TWG members are invited as optional.



# **Full TWG Preliminary Outcomes: Subgroup 3**

Topic	Preliminary outcome from Full TWG feedback survey	Next steps
Scope 3 requirement	<ul> <li>Majority support for revised text defining a scope 3 reporting requirement</li> </ul>	<ul> <li>Revised text was presented to ISB in July by Scope 3 Secretariat</li> <li>ISB feedback survey in progress</li> </ul>
Justifiable exclusions for scopes 1 and 2	<ul> <li>Majority support for maintaining scope 1 and scope 2 exclusions and making the exclusions more prescriptive and quantitative</li> <li>Majority support for defining separate quantitative exclusion thresholds for scopes 1, 2, and 3</li> <li>Majority support for defining a 1% quantitative exclusion threshold for scope 1 and scope 2</li> <li>Majority support for requiring total scope 1 and scope 2 emissions to be quantified to justify exclusions</li> </ul>	<ul> <li>Preliminary outcomes were shared with ISB in July</li> <li>ISB feedback survey in progress</li> </ul>
Less stringent scope 3 requirement	<ul> <li>Majority support for adopting the SBTi company categorization approach, pending its finalization, to define eligibility for a less stringent scope 3 requirement</li> <li>Majority support for defining a less stringent scope 3 requirement as the three most relevant scope 3 categories</li> <li>Majority support for operationalizing a less stringent scope 3 requirement with conformance levels, by reporter type</li> </ul>	<ul> <li>These preliminary outcomes were presented as a case study to the ISB in July as part of a broader discussion on whether it is the role of GHG Protocol to set different levels of reporting</li> <li>ISB feedback survey in progress</li> </ul>



# RELEASE: ISO and GHG Protocol Announce Strategic Partnership to Deliver Unified Global Standards for Greenhouse Gas Emissions Accounting

- A new era begins in carbon accounting as ISO and GHG Protocol agree to harmonize their existing portfolios of GHG standards and to co-develop new standards for GHG emissions measurement and reporting
- Until now, GHG standards have been developed separately with varying scopes and verification guidance. The new ISO-GHG Protocol partnership, announced today, represents a fundamental shift toward integration and co-development, enabling users to rely on a coherent framework and reducing potential confusion in the market
- The partnership will produce a common global language for emissions accounting, which will accelerate progress towards decarbonization
- The development of combined, credible standards for GHG emissions terminology, measurement, and reporting provides a long-awaited, trusted solution for companies, investors, verifiers, auditors and policymakers, and aligns with recent calls for harmonization by both government and companies.



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Draft for TWG discussion GREENHOUSE GAS PROTOCOL







# Full TWG survey results on phase 1 outcomes (summary)

Topic		Preliminary outcome	Survey results	
Corporate Standard objectives	Objectives statements	Draft Corporate Standard <b>objectives statements</b>	<b>47 of 47 support (100%)</b> 0 strong opposition (0%) 0 abstain (0%)	
GHG accounting and	Relevance and materiality	Update guidance on <b>relevance principle</b> to refer to the term " <b>materiality</b> " and provide <b>clarification on the relationship between relevance and materiality</b> as used in external programs (including with a supporting text box on materiality)	41 of 47 support (87%) 3 strong opposition (6%) 3 abstain (6%)	
reporting principles	Consistency and comparability	Update consistency principle to apply to consistency in methods both over time for a single company and consistency in methods between companies and divisions within companies. Update guidance for consistency principle to clarify relationship between consistency and comparability and how consistency in methods contributes to more comparable information (including with a supporting text box on comparability)	40 of 47 support (85%) 4 strong opposition (9%) 4 abstain (6%)	
	Accuracy and conservativeness	Update guidance for <b>accuracy principle</b> to include language on <b>conservativeness</b> and when companies should consider using conservative methods (including with a supporting text box on conservativeness)	43 of 47 support (91%) 2 strong opposition (4%) 2 abstain (4%)	
	Transparency and verifiability	Outstanding question posed:  How should principles be updated to better distinguish between external transparency and verifiability?  A. Update transparency principle to more clearly distinguish between external transparency and verifiability (including with a supporting text box on verifiability)  B. Delineate separate transparency and verifiability principles	35 of 47 support Option A (74%) 10 strong opposition to Option A (21%) 2 abstain (4%)	



#### **Feedback from ISB members and observing entities**

Draft for TWG discussion

More than two thirds of ISB members (8 of 12) expressed support for all preliminary Subgroup 1 phase 1 outcomes posed as pulse checks.

Topic	Pulse check poll results (ISB members only)	Comments from ISB members and observing entities
Corporate Standard objectives statement	Support: 11 of 12 (2 support with minor edits) Oppose: 0 of 12 Abstain/no response: 1 of 12	<ul> <li>Second bullet should reference information needs of users of GHG reports</li> <li>Should include reference to removals as well as emissions</li> </ul>
Relevance and materiality	Support: 11 of 12 (1 support with minor edits) Oppose: 0 of 12 Abstain/no response: 1 of 12	<ul> <li>Update critical for interoperability, recommendation to include specific guidance on climate-related materiality considerations to align with regulatory frameworks</li> <li>Relationship between relevance and materiality needs to be more clearly articulated (observing entity comment)</li> </ul>
Consistency and comparability	Support: 10 of 12 (3 support with minor edits) Oppose: 0 of 12 Abstain/no response: 2 of 12	<ul> <li>Need to resolve discrepancy with approach in Land Sector and Removals Standard</li> <li>Generally support, but consistency over a time series should be not be deemphasized</li> <li>Support, but needs clearer implementation guidance, such as on how companies should handle methodology changes when external standards evolve</li> <li>Definitions from IPCC Guidelines should be used (observing entity comment)</li> </ul>
Accuracy and conservativeness	Support: 10 of 12 (1 support with minor edits) Oppose: 1 of 12 Abstain/no response: 1 of 12	<ul> <li>Support, but it must be emphasized that conservativeness should not be a substitute for improving data</li> <li>Consider guidance on when conservativeness applies most</li> <li>Comment in opposition: information should be unbiased/neutral rather than conservative</li> <li>Conservativeness should be a requirement so that companies don't understate emissions or overstate reductions (observing entity comment)</li> <li>Concerns with introducing recommendations as these can reduce consistency/comparability (observing entity comment)</li> </ul>
Transparency and verifiability	Not posed for pulse check	One comment in <b>support of Option B</b> (delineating separate verifiability principle) to give verifiers their own acknowledgement and guidance

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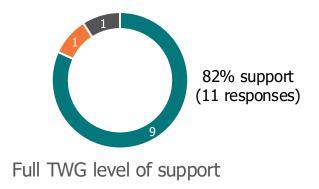


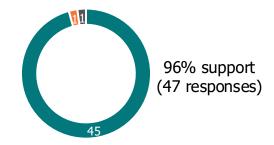


## Inventory base year and target base year

**Preliminary outcome:** Companies that a have base year established for GHG reduction targets should have the **option** to use the same year for their inventory base year or choose a different year.

Subgroup 1 level of support





SupportOppose

Abstain

#### **Comments (support):**

Flexible approach to accommodate varied circumstances

#### **Comments (strong opposition):**

 Corporate Standard should provide requirements for inventory base year, regardless of whether a company has a target or not. Inventory base year should be earliest representative year with reliable data to provide transparency on historical emissions.



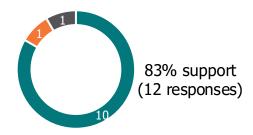




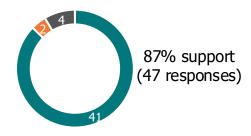
## Rolling base year option

**Preliminary outcome:** The **rolling base year option** as currently defined in the Corporate Standard **should be eliminated**.

Subgroup 1 level of support



Full TWG level of support



■ Support ■ Oppose ■ Abstain

#### **Comments (support):**

- Enhances consistency and transparency in reporting
- Reduces risk of companies manipulating base years to mask poor performance

#### **Comments (strong opposition):**

- **Depends on how option is defined**: rolling base year every year may be eliminated but allowing a base year to be rolled over longer time intervals should remain on the table
- Rolling base year may better allow for tracking mitigation efforts in sectors subject to rapid change





# Subgroup 1 poll: Require a quantitative significance threshold or allow qualitative and/or quantitative

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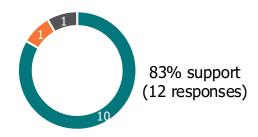
Allow qualitative and/or quantitative

■ Abstain

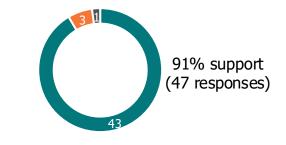
# Significance threshold requirement

**Preliminary outcome:** Companies should be **required to establish a significance threshold** as part of their base year recalculation policy.

Subgroup 1 level of support



Full TWG level of support



■ Support ■ Oppose ■ Abstain

#### **Comments (support):**

- Support for requiring a quantitative significance threshold: promotes standardization, comparability, and reduces need for interpretation
- Support for allowing qualitative and/or quantitative significance thresholds, but qualitative thresholds still need to clearly indicate what leads a particular factor to be above or below the threshold
- Support, but thresholds should focus more on the materiality of emissions
- Support, but significance thresholds need to be considered in relation to uncertainty
- Support, but more guidance is needed as base year recalculation can be challenging for users

#### **Comments (strong opposition):**

- Opposition to requiring base year recalculation
- Base year recalculation should be the purview of target setting standards, not GHG accounting standards
- Some companies **recalculate emissions whenever there's any structural change** judgement not based on a significance threshold for emissions



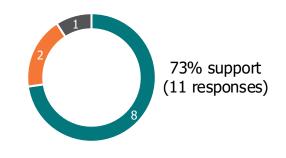




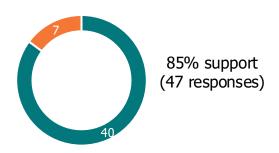
# Prescriptive quantitative significance threshold

**Preliminary outcome:** The Corporate Standard should define a **prescriptive quantitative significance threshold** for base year recalculation.

Subgroup 1 level of support



Full TWG level of support



■ Support ■ Oppose ■ Abstain

Subgroup 1 poll: Prescriptive quantitative significance threshold as requirement or recommendation



#### **Comments (support):**

- Support for a **requirement**: Ensure consistent application among companies and enhance comparability, ensure that companies recalculate their base year emissions, consider matching with requirements in other standards (e.g., SBTi)
- Support for a **recommendation**: Appropriate balance between standardization and flexibility, significance threshold should be based on materiality to company

#### **Comments (strong opposition):**

- **Opposition to requiring** base year recalculation, should be role of target setting standards
- Support for taking a **principles-based approach**, allowing companies to judge significance according to their own set of facts and circumstances
- Risk that level of uncertainty for calculated emissions exceeds the significance threshold
- Request to see examples
- Suggestion to further discuss the types of changes triggering base year recalculation, not just the size





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# Base year recalculation and lack of sufficient data: Questions to be considered

- What options should be available for companies when there's a lack of sufficient data for base year recalculation?
- Should a preferred option or hierarchy of options be specified?
- Should available options/preferred options differ for **different types of events triggering base year recalculation** (e.g., structural change versus methodological change)?



#### Reasons triggering base year recalculation: current GHG Protocol requirements

Corporate Standard, ch.5 (pp.35-36)

The following cases **shall** trigger recalculation of base year emissions:

- **Structural changes** in the reporting organization that have a significant impact on the company's base year emissions including:
  - Mergers, acquisitions, and divestments
  - Outsourcing and insourcing of emitting activities
- **Changes in calculation methodology** or improvements in the accuracy of emission factors or activity data that result in a significant impact on the base year emissions data.
- **Discovery of significant errors**, or a number of cumulative errors, that are collectively significant

#### Reasons triggering base year calculation referenced in other documents, but not in Corporate Standard:

Scope 2 Guidance, 9.2 (p.76)

Recalculation of a **market-based total**if scope 2 base year chosen only
calculated according to location-based
method

Scope 3 Standard, 9.3 (p.104)

Changes in **categories or activities** included in the scope 3 inventory

Draft LSR Guidance, 12.8.1 (p.236)

Changes in the **categories or activities** included in the inventory



## Base year recalculation and lack of sufficient emissions data

Options specified in Corporate Standard/Scope 3 Standard when sufficient data unavailable to recalculate base year emissions:

Option	Text from standards	Types of changes referenced in text
Backcasting	"If a company with a target acquires a company that did not have reliable GHG data in the target base	Structural changes
	year; backcasting of emissions becomes necessary, reducing the reliability of the base year." (Corporate Standard chapter 11, p.79)	Changes in data/ methodology
	"If the cumulative effect of adding or changing scope 3 categories or activities is significant, the company <b>should</b> include the new categories or activities in the base year inventory and <b>backcast</b> data for the base year based on available historical activity data (e.g., bill of materials data,	Changes in reporting boundary
Disclose no recalculation	spend data, product sales data, etc.)." (Scope 3 Standard 9.3, p.105)	Changes in data/
	"Sometimes the more accurate data input may not reasonably be applied to all past years or new data points may not be available for past years. The company <b>may</b> then have to <b>backcast</b> these data points, or the <b>change in data source may simply be acknowledged without recalculation</b> ." (Corporate Standard chapter 5, p.38; Scope 3 Standard 9.3, p.106)	methodology
Reestablish base year	"As an alternative to recalculating base year emissions in the event of a major structural change, companies may reestablish the base year as a more recent year." (Scope 3 Standard 9.3, p.104)	Structural changes

**Note:** The Corporate Standard and Scope 3 Standard do not specify any *requirements* for what to do when sufficient data is unavailable for base year recalculation. The above are all *guidance/recommendations*.





# **Backcasting: definitions**

- The Corporate Standard does not provide a definition of the term "backcasting"
- A common use of the term "backcasting" is in reference to a strategic planning method:
  - "Backcasting is a foresight evaluation technique that starts with defining a desirable future outcome and works backward to identify the necessary steps to achieve that outcome"<sup>1</sup>
  - This usage differs from that in the Corporate Standard
- Eurostat provides a definition of "backcasting" better aligned with the usage in the Corporate
   Standard:
  - "Backcasting refers to forecasting backward in time; the term has also been used for extrapolation.
     This is done by applying the forecasting method to a series starting from the end and going to the beginning of the data"<sup>2</sup>

**For consideration:** Whether the term "backcasting" should be maintained or replaced, and if maintained how it should be defined.

1. "Backcasting", United Nations Development Programme Independent Evaluation Office

2. "Glossary:Backcasting", European Union Eurostat





# Relevant program requirements: reestablishing a target base year



SBTi Corporate Net-Zero Standard (v2.0 Consultation Draft)

"Companies with previously validated targets may use the base year from the previous target cycle, provided that the organizational boundary and base year emissions remain valid, or **select the target year for the previous cycle**, depending on the target-setting approach used." (C4.2)

"For example, if a company had set targets in the previous cycle with a target year of 2030, it shall use 2030 as the target base year when setting targets for the next cycle." (Footnote to C4.2)



ESRS E1 Climate Change\*

"the undertaking shall disclose its current base year and baseline value, and from 2030 onwards, **update the base year** for its GHG emission reduction targets **after every five-year period** thereafter." (E1-4, 34(c))

"the undertaking shall update its base year from 2030 and after every 5-year period thereafter." (AR25(c))

\*Text from published version of ESRS E1. Text does not appear in <u>Amended Exposure Draft of ESRS E1</u>, with text deleted to allow for more flexibility on base year.

**Note:** External programs reviewed do no specify requirements/recommendations for base year recalculation in the absence of sufficient data, but program requirements on when a (target) base year should be reestablished may influence the viability of reestablishing a base year as an option in these instances when companies use the same year for inventory and target base year.



## **Subgroup 1 member feedback**

Options specified in Corporate Standard to address lack of data for recalculating base year emissions

#### **Backcasting**

- Should be the **preferred option** where historical activity data exists and credible estimates can be made
- Introduces uncertainties that are hard to measure and control
- Presents issues with auditing (i.e., backcast data will not meet requirements for audit and original audit will no longer be useful)

#### Disclosure of no recalculation

- Provides companies with too much leeway in opting out of base year recalculation, leading to inconsistent time series
- May be appropriate in instances where data is highly uncertain or where changes are not material
- Disclosure should entail nature of change, rationale for not performing recalculation, and any implications to time series

#### Reestablish base year

- Should only be considered as last resort, only adopted under clearly justified and disclosed circumstances
- Should be reestablished as the earliest year for which reliable data to recalculate is available
- Inhibits comparability among peer companies
- Limits tracking of emissions over a longer time series

#### **General comments:**

- Lack of data is a constant challenge when base year emissions are recalculated
- Large companies/large emitters should be expected to maintain more complete and higher quality historical data compared to SMEs



## Subgroup 1 member feedback

Methods cited for estimating base year emissions when sufficient emissions data unavailable

## Historical activity data

• Use historical activity data, where available, to calculate emissions

## Similar assets as proxy

 Base on a subset of assets or activities under consideration, or similar assets within the company or industry

#### Scale with revenue

• Scale emissions based on revenue after historical emissions data has been traced back as far as possible

## Industry average emissions intensity

• Apply industry-specific emissions intensity per unit revenue



## Resolving data gaps: Splicing techniques

IPCC Guidelines for National Greenhouse Gas Inventories, V.1, Ch.5 Time Series Consistency

The IPCC Guidelines for National GHG Inventories describes four "splicing techniques" to fill in data gaps to produce a complete and consistent time series when recalculating previous estimates using an improved calculation method or developing estimates for categories of emissions not previously calculated:

Splicing technique	Description	Potential applicability to base year recalculation
Overlap	When changing calculation methods, the relationship between emissions calculated using the previous method and the improved method over years where data is available for both can be used to proportionally adjust estimated emissions for years where data for the improved method does not exist	Applicable (only to recalculation due to methodological changes)
Surrogate data	Use of proxy data, with changes in a proxy variable used to estimate changes in emissions	Applicable
Interpolation	Interpolate to fill in estimates for intervening years over a time series where data does not exist	Not applicable to base year (only to intervening years)
Trend extrapolation	Use trend in emissions over years where data exists to extrapolate back to base year	Applicable

The IPCC Guidelines note that it is *good practice* to perform splicing using more than one method before deciding which technique to use and to document why a particular method was chosen.



# Discussion: Methods for "backcasting" or estimating base year emissions where emissions data unavailable

Draft for TWG discussion

Aggregated list of methods including those posed by Subgroup 1 members and those listed in IPCC Guidelines

Method	Description	Applicability	Data requirements	Quality rating <sup>1</sup>	Data feasibility rating <sup>2</sup>	Method feasibility rating <sup>3</sup>
Historical activity data	Use historical activity data and emission factors, where available, to calculate emissions	Any type of change	Activity data and emission factors for base year	High	Low	High
Similar assets as proxy	Base on a subset of assets or activities under consideration, or similar assets within the company or industry	Structural changes	Data for reasonably similar assets	Medium	Medium	Medium
Scale based on proxy data	Scale based on a proxy variable (e.g., revenue, production output), similar to IPCC surrogate data method	Structural changes	Data for a reasonable proxy variable	Medium	High	Medium
Overlap technique	IPCC overlap technique, use relationship between emissions calculated using previous and new/improved methods for years where data exists for both to scale base year emissions	Methodological changes	Data to apply both previous and new/improved methods	Medium	Medium	Low
Trend extrapolation	IPCC trend extrapolation technique, use trend in emissions over years where data exists to extrapolate back to base year	Any type of change	A time series from which base year emissions can be reasonably extrapolated	Medium	Medium	Low
Industry average emissions intensity	Apply industry-specific emissions intensity per unit revenue	Structural changes	Emissions intensity figures that can be reasonably applied	Low	High	Medium

- 1. **Quality rating:** Potential for producing data that reasonably represents actual emissions during the base year/ reasonably provides for a consistent time series
- 2. Data feasibility rating: Likelihood of having adequate data to reasonably apply method
- **3. Method feasibility rating:** Feasibility of implementing method for a range of reporters
- \* Preliminary Secretariat ratings intended as staring point only for discussion

#### Discussion



- Do you agree with ratings?
- Which methods are most applicable and in what situations?
- Are there other methods that should be considered?

30



#### Summary: Options for companies when data is unavailable for base year recalculation

(Preliminary Secretariat analysis)

Option	Pros	Cons	Circumstances where most applicable
"Backcasting"/ proxy estimation of base year emissions	Promotes a complete and consistent emissions profile over time	<ul> <li>Uncertainty in estimates</li> <li>Challenges with auditing</li> <li>Feasibility challenges and level of effort for companies</li> </ul>	Where data exists to apply a proxy estimation method* to develop a reasonable estimate of base year emissions  *See previous slide for analysis of proxy estimation methods
Disclose no recalculation	<ul> <li>Allows companies to prioritize efforts to addressing most significant changes</li> </ul>	<ul> <li>Inhibits a consistent profile over time</li> <li>Provides an "easy out" for companies to avoid recalculation</li> </ul>	Where change is relatively insignificant/does not have a material impact on overall base year emissions and consistent profile over time
Reestablish base year	<ul> <li>Promotes consistency (but over a shorter timeframe)</li> <li>Allows companies to prioritize tracking of emissions for more recent years if historical data is no longer relevant</li> </ul>	<ul> <li>Inhibits a complete emissions profile over time</li> <li>Undermines transparency and accountability</li> <li>Inhibits comparisons between companies</li> </ul>	Where change is (particularly) significant/ has a material impact on overall base year emissions and consistent profile over time and where a reasonable estimate cannot be made

Discussion .

• Which options are most applicable in what situations?



Are there other options that should be considered?



#### **Discussion:** Scenarios for base year recalculation

#### **Scenario 1: Structural change**

Company A makes a major acquisition of Company B.
Company B has not previously developed a GHG inventory. No activity data for Company B exists for the base year, but financial data does. Company A and Company B are in the same sector, with similar assets.

#### **Variations:**

- Company B represents a relatively minor acquisition
- Company B has activity data for several recent years but not the base year
- Company B is in a different sector than Company A

# Scenario 2: Methodology improvement

Company X switches from LCA to supplier-specific emission factors for a large portion of scope 3, category 1 emissions (purchased goods and services). Supplier-specific emission factors are only available for the current reporting year.

**Variation:** Supplier-specific emission factors are **available for several recent years** but not for the base year.

#### **Scenario 3: Boundary change**

Company Y expands its scope 3 inventory to include category 5 (waste generated in operations) for the first time. **Waste data is available for some recent years** but not for the base year.

#### **Discussion:**

- Which option(s) are most appropriate for addressing base year recalculation in the absence of sufficient data in each of the scenarios above?
- Would the most appropriate option(s) differ if some details of the scenario were changed? See variations for Scenarios 1&2.



## Polls: "Backcasting" and methods for estimating base year emissions

1. Which methods should be specified as suitable methods for "backcasting" or estimating base year emissions? *(multiple selection)* 

- a. Historical activity data
- b. Similar assets as proxy
- c. Scale based on proxy data
- d. Overlap technique

- e. Trend extrapolation
- f. Industry average emission intensities
- g. Other (specify in chat)
- h. Abstain

2. Should the term "backcast" be maintained or replaced?			
The term should be maintained <sup>1</sup>	The term should be replaced <sup>2</sup>	Abstain	

- 1. If maintained, the term will need to be defined. The following definition from <u>EuroStat</u> provides a staring point: "Backcasting refers to forecasting backward in time; the term has also been used for extrapolation. This is done by applying the forecasting method to a series starting from the end and going to the beginning of the data".
- 2. Alternative terms to consider include "estimation methods" or "proxy estimation methods".



Does activity data exist for the base year?

Yes

Use activity data to recalculate base year emissions

Does data exist to apply a proxy method that can reasonably estimate base year emissions?

No

Use the proxy method to estimate base year emissions

Yes

Consider reestablishing base vear

Yes

**Discussion:** 

What do you think of this decision tree as a conceptual framework to help guide companies on what to do when insufficient emissions data is available for base year recalculation?

Is the change (particularly) significant?\*

No

Disclose no recalculation

Draft concept:
Decision tree for base
year recalculation in the
absence of data

\*Phrasing "(particularly) significant" used as level of significance implied exceeds that defined by significance threshold. Question may also be framed in terms of changes with a material impact on base year emissions or consistent emissions profile over time.





# Polls: Options for companies when data is unavailable for base year recalculation

- 1. Should backcasting/proxy estimation methods be the preferred option where a method can be feasibly applied to develop a reasonable estimate of base year emissions and provide for a consistent emissions profile over time?
- a. For structural changes?
- b. For other types of events?\*

Options: Strongly disagree to Strongly agree, Abstain

#### 2. If backcasting/proxy estimation methods is specified as the preferred option, **how should it be defined**?

**Requirement** (*shall* statement)

**Recommendation** (*should* statement)

**Guidance** only

Abstain

- 3. **Should disclosure of no base year recalculation** be maintained as an option?
- a. For structural changes?
- b. For other types of events?\*

Options: Strongly disagree to Strongly agree, Abstain

- 4. **Should reestablishing the base year** be maintained as an option?
- a. For structural changes?
- b. For other types of events?\*

Options: Strongly disagree to Strongly agree, Abstain

	5. Do you agi	ree with the c	draft decisio	on tree on the	previous slide?
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Yes, fully agree Yes, with minor edits No Abstain

# **Agenda**

Introduction and housekeeping

10 minutes

 Review full TWG and ISB feedback on phase 1 outcomes

15 minutes

Follow up on base year recalculation policy

15 minutes

Options for when data unavailable for base year recalculation

70 minutes

Wrap up and next steps

10 minutes









## **Next steps**

# Items to be shared by GHG Protocol Secretariat:

- Final slides, minutes, and recording from this meeting
- Feedback survey

**Note:** The Secretariat will continue to work of text development and revisions and will share updates to chapter drafts as they're available.

#### **TWG** member action items:

 Respond to feedback survey (Deadline TBC)

## **Next meetings**

- Next full TWG meeting: Tuesday,
  October 21<sup>st</sup> (Option 1: 08:00-10:00 ET /
  14:00-16:00 CET / 20:00-22:00 CHN, Option
  2: 16:00-18:00 ET / 22:00-00:00 CET / 08:0010:00 Oct. 22<sup>nd</sup> CHN)
- Next Subgroup 1 meeting: Tuesday, November 11<sup>th</sup> (09:00-11:00 ET / 15:00-17:00 CET / 22:00-00:00 CHN)



# Thank you!

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# **Appendix A**

Detailed results of full TWG feedback survey



# **GREENHOUSE** GAS PROTOCOL



# **Objectives statement**

**Preliminary outcome:** Draft objectives statement (below)

The primary goal of the Corporate Standard is to help companies develop and maintain a relevant, complete, consistent, accurate, and transparent GHG inventory, using standardized approaches and principles in order to:

- Provide companies with information that can be used to develop an effective strategy to manage and reduce GHG emissions and track implementation progress
- Support more transparent and comparable reporting of GHG emissions according to a standardized set of accounting and reporting requirements

TWG members indicated *unanimous support* for the draft objectives statement (47 of 47 respondents).

#### **Member comments:**

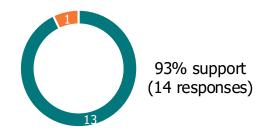
- Statement reinforces key principles acknowledges key uses of GHG data for managing/reducing emissions and external reporting
- Support reference to **standardization**, supporting comparability
- Reference to "relevance" is unclear, need to specify relevant to whom/what\*
- May be important to explicitly reference interoperability with other frameworks and regulatory requirements
- Suggestion to add the word "improve" to read "develop, maintain, and improve" in opening of statement
- Suggestion to replace "Provide companies with information that can be used to develop" with "inform development of" in first bullet for sake of simplification
- Suggestion to add "over time" to end of first bullet
- Suggestion to add "consistent" in second bullet, "support more transparent, comparable, and consistent"
- Suggestion to remove word "more" from second bullet



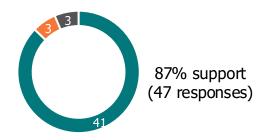
## **Relevance and materiality**

**Preliminary outcome:** Update guidance on **relevance principle** to refer to the term "**materiality**" and provide **clarification on the relationship between relevance and materiality** as used in external programs (including with a supporting text box on materiality)

Subgroup 1 level of support



Full TWG level of support



■ Support ■ Oppose ■ Abstain

#### **Comments (support):**

 "Materiality" is a quantifiable term and as such has value that goes beyond that of the more general term "relevance"

#### **Comments (strong opposition):**

- Support for further integrating content on materiality, but opposed to referring to external programs (except clarifying that use of materiality in GHG accounting is different than that in external programs)
- Materiality in the context of identifying material topics for a company is not applicable in GHG accounting
- Use of supporting text box gives impression that materiality is a principle distinct from relevance, which can cause confusion

#### **Other comments:**

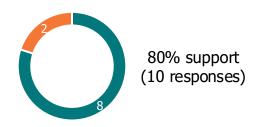
- Important to consider users who are non-native English speakers when clarifying terminology like "relevance" and "materiality"
- Care must be taken when defining materiality in terms of quantitative thresholds
- Text must be clear to avoid confusion regarding different uses of the term "materiality"



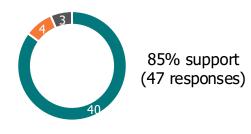
## **Consistency and comparability**

**Preliminary outcome:** Update **consistency principle** to apply to **consistency in methods both over time for a single company and consistency in methods between companies (where relevant)** and divisions within companies. Update guidance for consistency principle to clarify relationship between consistency and comparability and how consistency in methods contributes to more comparable information (including with a supporting text box on comparability)

Subgroup 1 Level of support



Full TWG level of support



■ Support ■ Oppose ■ Abstair

#### **Comments (support):**

- Provides **clarity** in distinguishing consistency and comparability as **distinct but related concepts**
- Support alignment with financial accounting on terminology (but the definition of comparability from financial accounting is hard to understand)

#### **Comments (strong opposition):**

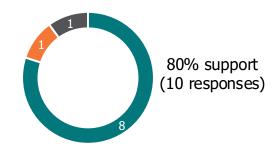
- Consistency over a time series and between different companies should be distinguished as separate concepts
- Updates deemphasize consistency over a time series
- The market has broadly accepted existing definitions
- Issues with enforceability of consistency principle across companies
- Summary statement on outcome should include qualifying language "**if relevant**" whey applying to consistency between companies (*note: amended in statement above*)



# **Accuracy and conservativeness**

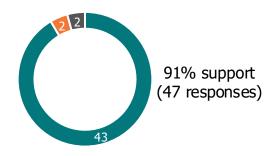
**Preliminary outcome:** Update guidance for **accuracy principle** to include language on **conservativeness** and when companies should consider using conservative methods (including with a supporting text box on conservativeness)

Subgroup 1 level of support



Full TWG level of support

SupportOppose



Abstain

#### **Comments (support):**

- Help prevent selective underreporting
- Support, but it's important to emphasize that conservativeness should not be a substitute for improving data quality
- Important indication to provide as low-accuracy data is a continual challenge

#### **Comments (strong opposition):**

- Conservativeness conflicts with accuracy and introduces bias
- Suggestions to consider other terms/concepts: "prudence", "neutrality"
- Use of supporting text boxes may cause confusion, conservativeness is not necessarily an aspect of accuracy



# **Transparency and verifiability**

**Outstanding question posed to full TWG:** How should principles be updated to better distinguish between external transparency and verifiability?

- **A. Update transparency principle** to more clearly distinguish between external transparency and verifiability (including with a supporting text box on verifiability)
- B. Delineate **separate** transparency and verifiability principles

Subgroup 1 and Full TWG poll results			
Subgroup 1 live poll (meeting 8)	Subgroup 1 feedback survey	Full TWG live poll	Full TWG feedback survey*
Option A: 6 of 14 (43 %)  Option B: 8 of 14 (57%)  Abstain: 0 of 14 (0%)	Option A: 5 of 10 (50%) Option B: 5 of 10 (50%) Abstain: 0 of 10 (0%)	Option A: 22 of 38 (58%) Option B: 14 of 38 (37%) Abstain: 2 of 38 (5%)	Support Option A: 35 of 47 (74%) Oppose Option A: 10 of 47 (21%) Abstain: 2 of 47 (4%)

<sup>\*</sup>Following outcome of live meeting poll, question posed as "Please indicate if you support moving forward with Option A as the *most supported* option."

#### **Comments in support of Option A:**

- Introducing a new principle will be viewed as a more significant update by stakeholders
- Concepts are closely related and can be maintained as part of the same principle

#### **Comments in support of Option B:**

- Transparency and verifiability should be considered separate concepts
- Verifiability is a necessary, but not sufficient condition of transparency
- Improves conceptual alignment with external programs
- Option B may be more forward-looking with increasing emphasis on assurance

# **Appendix B**

Slides presented to ISB on July 28th









## Corporate Standard objectives statement

#### **Draft objectives statement**

The primary goal of the Corporate Standard is to help companies develop and maintain a relevant, complete, consistent, accurate, and transparent GHG inventory, using standardized approaches and principles in order to:

- Provide companies with information that can be used to develop an effective strategy to manage and reduce GHG emissions and track implementation progress
- Support more transparent and comparable reporting of GHG emissions according to a standardized set of accounting and reporting requirements

#### **Level of support**

#### **Full TWG:**

- 100% support for objectives statement (32% support with minor edits)
- 0% oppose
- 0% abstain

38 members

### **Rationale**

- Incremental updates to current objectives listed in Corporate Standard with updated format to highlight a primary goal in connection with key uses of GHG information supported
- Responds to stakeholder requests for more comparable GHG information

## **Implications**

 Supporting more comparable reporting of GHG information recognized as an objective





### Relevance and materiality

#### **Preliminary outcome**

Update guidance on **relevance principle** to refer to the term "**materiality**" and provide clarification on the relationship between relevance and materiality as used in external programs (including with a supporting text box on materiality)

#### **Rationale**

Providing **clarifying language** on the concept of materiality as it relates to the relevance principle used by programs referring to the Corporate Standard helps **promote interoperability** and **supports reporters** subject to or participating in external programs.

### **Level of support**

#### **Subgroup 1:**

- 93% support
- 7% oppose
- 0% abstain

14 members

#### **Full TWG:**

- **98% support** (19% support with minor edits)
- 2% oppose
- 0% abstain

43 members

### **Implications**

- Update provides clarifying language only no **major implications are expected**
- Subgroup 2 will address updates related to verification and assurance, where there may be further consideration of the term "materiality" in this context





## Consistency and comparability

#### **Preliminary outcome**

Update **consistency principle** to apply to consistency in methods both **over time** for a single company *and* consistency in methods **between companies and divisions within companies**.

Update guidance for consistency principle to clarify relationship between consistency and comparability and how **consistency in methods contributes to more comparable information** (including with a supporting text box on comparability)

#### **Level of support**

#### **Subgroup 1\*:**

- 62% support
- 23% oppose
- 15% abstain

13 members

#### **Full TWG:**

- **98% support** (23% support with minor edits)
- 2% oppose
- 0% abstain

43 members

#### **Rationale**

- Respond to **stakeholder needs** for more comparable information and support **comparability objective** without adopting a new principle
- Alignment in terminology with financial accounting and relevant programs (e.g., IFRS S1, ESRS 1)
- Clearer delineation between consistency in methods and comparable information (support by consistency)

#### **Implications**

- Concerns that approach **deemphasizes consistency over a time series** (noting that key text related to documenting changes in data, methods, boundaries, etc. over time maintained)
- Consistent application of methods **cannot be fully achieved** by a principle (supporting text acknowledges limitations)
- Differs from approach in Land Sector and Removals Standard rectification will require further consideration





<sup>\*</sup>Poll on whether to update definitions of consistency and comparability, leading to recommendation above



## Transparency and verifiability

#### Question and options posed to TWG

How should principles be updated to better distinguish between **external transparency and verifiability**?

#### **Option A**

Update transparency principle to more clearly distinguish between external transparency and verifiability (including with a supporting text box on verifiability)

**Rationale:** Maintains current framing of transparency principle and **avoids the introduction of a new principle** while better distinguishing between external transparency and verifiability

## **Option B**

Delineate separate transparency and verifiability principles

**Rationale:** May **better disentangle** and more specifically highlight the respective importance of both external transparency and verifiability

Note: **Verification and assurance**, including whether verification or assurance should be required as part of the Corporate Standard, will be considered by Subgroup 2 in phase 2.

#### **Level of support**

• Subgroup 1: 43% Option A, 57% Option B, 0% Abstain (14 members)

• Full TWG: 58% Option A, 37% Option B, 5% Abstain (38 members)

Split opinions

To be finalized by TWG







## Accuracy and conservativeness

#### **Preliminary outcomes**

Update guidance for **accuracy principle** to include language on **conservativeness** and when companies should consider using conservative methods (including with a supporting text box on conservativeness).

#### **Level of support**

#### **Subgroup 1:**

- 71.5% support
- 21.5% oppose
- 7% abstain

14 members

#### **Full TWG:**

- **91% support** (35% support with minor edits)
- 5% oppose
- 5% abstain

43 members

#### Rationale

- Establishes conservativeness as a *recommendation* rather than *requirement*, giving companies flexibility in determining whether and when to apply conservative methods based on their **business goals**
- Helps avoid understatement of emissions in instances of high uncertainty
- Can incentivize companies to obtain higher quality data

#### **Implications**

- Concerns with **compromising accuracy and introducing bias** (addressed by language emphasizing that **conservativeness should not be a substitute** for improving data quality)
- Concerns with overstating reductions over time as data quality improves (addressed by base year recalculation requirements)
- When to apply conservative approaches contingent on understanding uncertainty – topic to be considered by Subgroup 3 in phase 2





# **Change log**

Slide #s	Change	<b>Details</b>	
12	New slide	New slide on ISO partnership announcement	
14	Updated slide	Updated text at bottom of slide to reference Appendix A for detailed results of Full TWG survey on preliminary phase 1 outcomes	
15	New slide	New slide providing a summary of ISB feedback survey results on preliminary phase 1 outcomes, with further updates made subsequent to Subgroup 1 meeting to incorporate additional responses received from ISB members.	
19	Updated slide	3 <sup>rd</sup> bullet under comments in strong opposition updated to align with clarification provided by member	
37	Updated slide	Slide updated to add times for both options for full TWG meeting	
39-44	New slides	New Appendix A to provide detailed results of Full TWG survey on preliminary phase 1 outcomes	