

November 13, 2025

Dear Misti Groves (CEBA),

Thank you for reaching out to GHG Protocol on the topic of anonymity and confidentiality in public consultation via our website form for concerns and complaints. Following the evaluation criteria of GHG Protocol's *Concerns and Complaints Procedure*, we classified your submission as a concern.

GHG Protocol always welcomes Stakeholders' feedback as part of an inclusive process. We understand your concern as a request for rebalancing when considering trade-offs between transparency and inclusion. We acknowledge that in some cases, stakeholders may have valuable contributions to offer during e.g., a public consultation, but for which they do not want public attribution for a variety of reasons.

Transparency, accountability, and representation from key stakeholder groups are paramount to our standard development process and the future uptake of final standards. As such, the default remains for all published feedback to be fully attributed to the respondent.

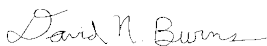
Based on additional benchmarking against best practice and the practices of other standard-setting organizations, our governance bodies have recently approved revisions to the GHG Protocol's *Standard Development and Revision (SDR) Procedure* which will give greater flexibility.

Under this revision, all comments collected during public consultation will be made publicly available per best practice but in the exceptional circumstance that full attribution prohibits your ability to participate in the consultation, respondents may request that their name, organizational affiliation, and jurisdiction be redacted from the publicly available database of feedback. All consultations will be subject to published terms of engagement, with clear instructions provided to potential respondents to help them understand their participation and transparency options.

We will not typically allow for full anonymity as this does not meet stakeholder demands for transparency and could easily result in respondents operating in bad faith. In exceptional circumstances where good cause exists, a respondent may request that highly sensitive or confidential information not be made publicly available. This narrow exemption will typically only be granted for provision of commercially sensitive data or pre-publication research findings *in support of or as a supplement to feedback otherwise subject to public disclosure*. Requests for confidentiality are subject to review and pre-approval by the GHG Protocol Secretariat and not guaranteed. You can find the amended SDR Procedure here: [Standard Development and Revision Procedure V1.1](#).

We look forward to your contributions to current and upcoming public consultation. Please do not hesitate to reach out to us if you have further questions.

Sincerely,



David Burns, Director of Governance, Greenhouse Gas Protocol

Name:

Misti Groves

Date Submitted:

Sep 18, 2025

What is your organization?:

Clean Energy Buyers Association

Description of complaint or concern:

The GHG Protocol should allow respondents to submit feedback during the upcoming public consultation period that 1) will not be publicly attributed to them if they prefer and 2) will be kept confidential upon request. The concern: The upcoming public consultation will be more robust if respondents provide candid, specific views on the ongoing revisions. That may include companies providing concrete examples and anecdotes and sharing sensitive information with the GHG Protocol. Companies may be more forthcoming if they can choose to submit feedback with attribution, without attribution, or confidentially (i.e., feedback that is not published even without attribution), and if they can make that choice before submitting feedback. The GHG Protocol's Standard Development and Revision Procedure states: •4.5.1: "All feedback received during the public consultation period shall be made publicly available with attribution on the GHG Protocol website." • 4.5.2: "In exceptional cases where attribution is deemed to be sensitive by the Secretariat, the Secretariat shall request the ISB to approve withholding of any attribution." While we appreciate the GHG Protocol's effort to offer transparency in the feedback received, the current procedure risks unnecessarily curbing corporate participation in the public consultation, potentially undermining the integrity of the process. Furthermore, we think companies are better placed to assess whether their feedback is sensitive. The Secretariat cannot decide for respondents what is sensitive. If companies have an option, guaranteed before rather than after submitting feedback, of the GHG Protocol removing attribution before publishing, or in special cases even refraining from publishing their feedback upon request, companies may be able to provide enhanced feedback. Recent examples of such an approach include the GHG Protocol's survey for the "Technical Guidance for Calculating Scope 3 Emissions" as described in the June 2024 Detailed Summary of Scope 3 Stakeholder Survey Responses, and the Taskforce on Nature-related Financial Disclosures with its survey for the 2025 Status Report. Proposed corrective action: Change the language of the GHG Protocol's Standard Development and Revision Procedure section 4.5 so that the form used for the public consultation lets respondents choose whether responses shall be attributed or not and includes an option to request that the GHG Protocol not publish nor attribute the submitted feedback.

Which workstream does this involve:

Scope 2

Could you clarify which part of the process you're encountering challenges with?:

Secretariat