

December 3, 2025

Dear Misti,

Thank you for reaching out to GHG Protocol on the topic of the duration of Scope 2 public consultation period via our website form for concerns and complaints. Following the evaluation criteria of GHG Protocol's Concerns and Complaints Procedure, we classified your letter as a complaint. In line with our due process, the topic was brought to the respective subcommittee of our Independent Standards Board (ISB) for review and in this specific case, to the ISB and the Steering Committee (SC) for decision as changes in governance documents (Standard Development and Revision Procedure, SDRP) were requested.

GHG Protocol always welcomes Stakeholders' feedback and criticism. Transparency and inclusion are hallmark principles of any robust multi-stakeholder process.

We are happy to inform you that GHG Protocol has extended the deadline for its Scope 2 and Electricity Sector Consequential Accounting public consultations. Originally scheduled to run from October 20 to December 19, the consultation period will now stay open through January 31, 2026. This extension was granted in response to stakeholder feedback and is intended to give stakeholders from across the globe additional time to review the materials and provide input through the online surveys.

We are convinced that this extension to more than 100 days will enable all interested stakeholders to send their responses.

Any further extension to 120 days or more would lead to significant delays for Phase 2 work and publication of the final standards.

We hope these clarifications have assisted your understanding of Greenhouse Gas Protocol's due process. We look forward to receiving your contributions to the Scope 2 public consultation, which will inform the further development and revision of Greenhouse Gas Protocol standards.

Please do not hesitate to reach out to us if you have any further questions.

Best regards,

David Burns, Director of Governance, GHG Protocol

Complaint: Extend Public Consultation Period

Description:

We respectfully submit a complaint under the GHG Protocol Complaints and Concerns Procedure 2.2.1 i (“failure to conduct required public consultations”) related to the insufficient duration of the public consultations for the Scope 2 and the Electricity Sector Consequential Methods (see GHG Protocol Public Consultations, available at [GHG Protocol Public Consultations | GHG Protocol](#) (October 20, 2025)).

We agree with the GHG Protocol that public consultation is a “critical component of the GHG Protocol’s Standard Development and Revision procedure.” However, we assert that the 60-day calendar duration of the public consultations is inadequate to provide a meaningful “opportunity for all stakeholders to contribute feedback on key topics related to the GHG Protocol standards and guidance” and threatens the integrity of the revision process.

For many stakeholders, this is not enough time to engage with the content published by the GHG Protocol and prepare useful feedback, especially given that the period overlaps with several public holidays and competing events. We therefore ask the GHG Protocol to extend the two public consultations to at least 120 calendar days.

We recognize the importance of not delaying the overall revision process, and we do not believe a 120 calendar day consultation period will impact the schedule. Rather, we assert that ensuring there is enough time to gather a robust public response will lead to better and quicker decision-making. As the Protocol has stated, “care shall be taken to ensure as balanced a stakeholder group as possible has been engaged . . . to provide comments and feedback during the public consultation.” A 60 calendar day period does not meet this goal (see [Standard Development and Revision Procedure V1.1](#) (section 4.2.1)).

The 60 calendar day period is inadequate for the following reasons:

- **Stakeholders will need to undertake a substantial amount of work to provide meaningful feedback for two public consultations.** The consultation materials are informative, but lengthy. Stakeholders, especially those that do not closely follow the revision process, may also need to contend with over two years of background information including, but not limited to: [Survey Responses](#) (2022-2023), [Terms of Reference](#) (Sept. 2024), Governance Documents (Sept. 2024), TWG Presentations and Meeting Minutes (Sept. 2024-Sept. 2025), and several GHGP [blogs](#) and newsletters.
- **The public consultations include over 200 questions; many require expertise and detailed information.** Many of the 235 questions require respondents to gather

organizational information that is likely housed in different departments. The questions included in Electricity Sector Consequential Methods require expertise on marginal emissions and their calculations. The GHGP provides background information on the differences between attributional and consequential accounting, but that adds to the burden described in the first point above. Finally, with the current section 4.5.2 of the Standard Development and Revision Procedure V1.1, stakeholders who need assurance that their responses will be kept confidential need to submit a request and wait for approval before they submit. Even if stakeholders do not need their response to be confidential, they may nonetheless need to get internal approvals before they submit, which could take significant time.

- **60 calendar days is not enough working time for meaningful comment.** There are 16 non-working weekend days between October 20 and December 19. There are also observed holidays. In the US, these include Veterans Day (November 11) and Thanksgiving (November 27-28). In addition, this period includes Hanukkah (December 15-22); several Indian holidays including Diwali (October 20) and Guru Nanak Jayanti (November 5); and two public holidays observed in several parts of Europe (All Saints Day on November 1; Feast of the Immaculate Conception on December 8).
- **Many stakeholders will be simultaneously engaged in competing activities and events.** The public consultation period of the Science Based Targets initiative's Corporate Net-Zero Standard starts on November 4, and the United Nations Climate Change Conference in Belem takes place November 10-21. Many of CEBA's members – GHGP users – will be tackling both.
- **Respondents should be allowed to consider the bigger picture on consequential accounting before commenting on other revisions.** The Actions and Market Instruments (AMI) Technical Working Group (TWG) is currently producing a white paper, expected in December 2025, to cover key concepts, principles, and approaches. We have reason to believe the AMI TWG will release the white paper for public comment in the first quarter of 2026. Stakeholders should have the opportunity to simultaneously consider the white paper along with the proposed revisions to the Scope 2 Guidance and the feedback received from the Electricity-Sector Consequential Methods consultation period.

Proposed corrective action:

Extend the duration of the two public consultation periods so that it has a meaningful overlap with any comment period for the public white paper coming out of the AMI TWG in Q1 2026, but not to be less than a minimum of 120 days.

We have received comparable complaints from the individuals listed below and have issued substantively aligned responses. In line with GHG Protocol's [Complaints and Concerns Procedure](#), we evaluate each complaint according to established criteria and respond in a consistent and transparent way.

Name	Organization	Complaint Received	Response from GHG Protocol
Lesley Hunter	American Council on Renewable Energy (ACORE)	28/10/2025	03/12/2025
Lisa Jacobson	Business Council for Sustainable Energy	22/10/2025	03/12/2025
Steven Holty	Hemlock Semiconductor Operation LLC	31/10/2025	03/12/2025
Michael Leggett	Evergreen Renewables	31/10/22	03/12/2025
Kelly Lichter	PepsiCo, Inc.	05/11/2025	03/12/2025
Emissions First Partnership	Emissions First Partnership	06/11/2025	03/12/2025
Confidential	Confidential	07/11/2025	03/12/2025
Jim Boyle	Sustainability Roundtable Inc	07/11/2025	03/12/2025
Patrick Falwell	N/A	07/11/2025	03/12/2025
John Powers	Schneider Electric	07/11/2025	03/12/2025
Samantha Cote	Solstice Power Technologies, LLC	10/11/2025	03/12/2025
Sandhya Murali	Solstice Power Technologies, LLC	10/11/2025	03/12/2025
Jeff R Rodgers	AT&T	11/11/2025	03/12/2025
Confidential	Confidential	11/11/2025	03/12/2025
Adam White	RECS Energy Certificate Association	14/11/2025	03/12/2025
Confidential	Confidential	14/11/2025	03/12/2025
Brad Schallert	Winrock International	14/11/2025	03/12/2025
David Osborn	Sustainability Roundtable, Inc	14/11/2025	03/12/2025
Devon Lukas	REsurety	13/11/2025	03/12/2025
Renee Morin	eBay	14/11/2025	03/12/2025
SoYoung Jang	SEMI	15/11/2025	03/12/2025
Justin Murrill	AMD	17/11/2025	03/12/2025
Confidential	Confidential	18/11/2025	03/12/2025
Jeff Rudnik	ASM	19/11/2025	03/12/2025

Autumn Fox	Mars	19/11/2025	03/12/2025
Suji Kang	Asia Clean Energy Coalition	20/11/2025	03/12/2025
Hollie Mitchell	Steel Dynamics, Inc.	20/11/2025	03/12/2025
Confidential	Confidential	21/11/2025	03/12/2025
Confidential	Confidential	21/11/2025	03/12/2025
Audrey Beattie	Beverage Industry Environmental Roundtable (BIER)	24/11/2025	03/12/2025
Dan Byers	U.S. Chamber of Commerce	25/11/2025	03/12/2025
JC Sandberg	American Clean Power Association	25/11/2025	03/12/2025
Shannon Weigel	Trio	26/11/2025	03/12/2025
Confidential	Confidential	28/11/2025	03/12/2025
Confidential	Confidential	28/11/2025	03/12/2025
Emma Fryer	CyrusOne	02/12/2025	03/12/2025