

March 11, 2026

Dear Adam White (RECS Energy Certificate Association),

Thank you for reaching out to GHG Protocol on the topic of the GHG Protocol consultation on scope 2 emissions accounting guidance specifically and our public consultation in general 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.

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

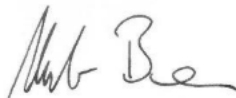
We have to apologize for the delayed response as both governance and Scope 2 teams were extremely busy recently while finalizing the two Scope 2 public consultations. As you know, the public consultation periods were extended through January 31st. Pursuant to Section 4.4.4. of the [Standard Development and Revision Procedure \(SDRP\)](#), we analyzed the number and variety of stakeholders to assess representativeness. More than 1,000 responses from over 50 countries across different stakeholder groups were received. In this regard, we believe that input to GHG Protocol public consultations are representative of stakeholders across the spectrum.

For analysis, evaluation and response to comments, we refer to section 4.5 of our SDRP which you may consult again as some of your proposals are currently part of our process. We are now working through evaluating all of the responses we've received. Summaries of both consultations will be shared in the coming months, along with the full set of responses on the [public consultations landing page](#).

We thank you for your constructive proposals to further increase inclusiveness and ease of use in our consultation processes. We plan to consider these as we develop future consultations on draft standards and as we conduct an upcoming governance review.

Please don't hesitate to reach out to us if you have any further questions.

Kind regards,



Prof. Dr. Alexander Bassen, Chair of the Independent Standards Board



Complaint about the standard of the GHGP consultation on scope 2 emissions accounting guidance

Prepared by Adam White – Secretary-General, RECS Energy Certificate Association. Some initial research supported by AI tools.

To whom it may concern,

The RECS Energy Certificate Association hereby lodges a complaint about the standard of the GHGP consultation on scope 2 emissions accounting guidance. While we recognise that changes to the consultation content and process are unlikely at this stage, we nonetheless want to place our disagreement on record.

Firstly, we are grateful that GHGP secretariat has extended the consultation period to just over 100 days. However, we still note the importance of this consultation, the number and complexity of many of the questions, and the fact that the period now includes the end of the year which involves holidays for many regions. **Therefore, we request that the current GHGP Scope 2 guidance consultation allow the maximum possible consultation period of 120 days.**

We also feel that the consultation structure should be more flexible and accessible to allow all potential respondents to fully participate. For smaller organisations with fewer resources and less technical knowledge and capacity, the consultation is complex and there are limited, if any, clearly available plain language explanations of the context or content of the questions and proposals. Furthermore, the consultation is only available in English and Mandarin, even though the GHGP is expected to be implemented globally. For larger organisations with greater resources, the survey-based structure of many questions is overly restrictive - requiring 1-5 grading or selecting from pre-determined options. Even the 'other' text boxes are character limited – restricting the ability to fully respond with detailed positions and/or technical contributions.

We appreciate the extensive work required to process such a consultation. However, we consider that in a desire to make the consultation more manageable, the GHGP Secretariat has built in structural flaws that risk disadvantaging large and small stakeholders alike. The consultation should allow for responses that do not easily fit within the confines of the current survey-based structure. While this might increase the time needed to process responses, the importance of the Scope 2 guidance should mean that the inclusiveness and quality of responses and their processing is prioritised over the timeliness of the consultation's management. This is the first revision of the GHGP in 11 years, and it is worth taking this opportunity to collect input that is as broad and deep as possible.

We are also concerned that consultation's rationale refers to research findings but does not provide specific citations or references. This limits respondents' ability to verify or engage with the underlying evidence. Furthermore, we find that several questions appear to embed implicit assumptions about preferred outcomes, which may limit the range of responses and perspectives that participants can realistically provide, such as:

- Assumptive wording such as “unrelated sources” in Q18,
- The assumption about precision with “most precise/less precise boundary” in Q31,
- No “other” option for a larger market boundary under Q69, if the respondents find all 3 options not sufficient,
- Insistence on the term “deliverable boundary” while the question is asking about an exemption threshold in Q70,
- The response options provided under Q52, Q135, and Q137 do not allow respondents to adequately reflect potential negative impacts or unintended consequences,
- The term “carbon-free” is introduced under Q126 and Q142 without prior definition or explanatory context,
- Q140 is framed in favour of the applicability of hourly matching and assumes the existence of constrained market boundaries, effectively pre-empting issues that are otherwise presented as open for consultation (this framing is also reflected in Q69, 70, 83, 90, 94)

Clarifying and neutralising this framing would strengthen the consultation by enabling respondents to engage more freely across the full spectrum of views. Instead, the questions should be more open, asking if the respondent supports an alternative approach altogether. ***Therefore, we request that GHGP consultations in general allow a wider range of input/feedback modes. GHGP consultations should also offer a clearer resource of lack of plain language and non-technical summaries, including of each consultation question/area.***

Regarding the management of the consultation, we find that there also remains significant ambiguity as to exactly how the GHGP secretariat will process the consultation responses. Beyond this, it is also unclear to many stakeholders, including RECS members, what aspects of the responses will be considered by the technical working group, and how they will be processed. For all stakeholders to have full confidence in the consultation process, the GHGP secretariat should fully clarify and communicate on these matters. ***Therefore, we call on the GHGP to publish a comprehensive comment matrix and/or summary that shows what changes were made (or not) based on consultation responses and why. The GHGP should also commit itself to a mandatory second round of consultation on the Scope 2 guidance, following the processing of the current consultation, to ensure that all viewpoints are fully considered. At the very least, the GHGP should clarify the criteria for triggering a second consultation round.***

Given the status of the GHGP Scope 2 guidance, RECS firmly believes that the GHGP should do everything it can to ensure that all stakeholders have confidence in the work of the GHGP in general, and the Scope 2 guidance in particular. We can categorically say that many RECS Members do not currently have such confidence in either. ***Therefore, to address this situation, the GHGP should do as other international bodies recommend and commission an external review of its consultation process to increase transparency and legitimacy.***

RECS' complaint regarding the GHGP's consultation content and process is based on a review of publicly available best practice guidelines from highly respected international organisations, including the:

1. [OECD Guidelines for Citizen Participation Processes](#)
2. [Guide to Meaningful Public Consultations \(ITU / World Bank / OFCOM\)](#)
3. [Consulting the Public when preparing EU Law \(European Court of Auditors\)](#)
4. [World Bank Guidelines for Public Consultation](#)
5. [IDB \(Inter-American Development Bank\) Guidelines on Stakeholder Engagement](#)
6. [British Standards Institute Public Consultation Guidance](#)
7. [ISEAL Alliance Code of Good Practice for Standard Setting](#)

These guidance documents highlight several common themes and best practices. These are useful criteria to evaluate whether a public consultation is well-designed and legitimate:

- **Inclusiveness:** Make sure all relevant stakeholder groups (especially marginalized ones) are fully and fairly consulted.

- Transparency & Openness: Publish clear background documents, including plain language explanations of the topic being consulted on and how responses will feed into decisions.
- Reasonable Timing: Give enough time for stakeholders to review and respond to avoid restrictive consultation windows that preclude meaningful input.
- Diverse Formats: Use a mix of methods (e.g. face-to-face, online, surveys, free text responses and submission of documentation, focus groups) that reflect diverse stakeholder needs and preferences.
- Feedback Loop: Report back on results — publish summaries of comments and highlight which suggestions were taken up and which were not, with clear explanations as to why such decisions were taken.
- Evaluation: Assess the effectiveness of the consultation process itself, especially when more than one consultation is expected on a given topic.
- Accessibility: Use plain language, make materials available in various formats, and translate documents where respondents are likely to benefit from such a step – for example in an international context.
- Integrity & Accountability: Define clear processes, disclose how decisions are made, and make sure there are accountability mechanisms.

RECS therefore bases its assessment on a benchmark comparison of the GHGP consultation process against other international organisations following consultation best practices. Examples of where the GHGP falls short in this comparison include, but are not limited to the following:

- The ISO consultation process enables more granular clause-level commenting, more open text-based submissions, and more formal comment disposition mechanisms. The GHGP Protocol's process (survey-based) is more constrained by comparison. This reduces flexibility for both detailed technical edits and broader input outside of the survey structure.
- The British Standards Institute (BSI) offers strong transparency on how consultation comments are considered. The GHGP could improve its consultation process by offering a detailed comment-resolution report.
- The ISEAL Code encourages at least two rounds of consultation in many cases. GHG Protocol's option for a second round is conditional on ISB approval, not automatic, which is less robust than ISEAL's recommended practice. ISEAL also explicitly requires balance of interests; while GHG Protocol attempts to ensure stakeholder representation, its practical design (survey form, limited time) could favour more powerful or better-resourced actors.
- Many open or community driven standards such as OpenChain provide broad access (e.g. via GitHub), long comment periods, and issue tracking. This model is more inclusive of both technically literate but also of non-traditional stakeholders (e.g., independent developers, NGOs). By comparison, the GHGP's

model is more formal and potentially less inclusive as it offers less public transparency and community-driven iteration.

- National standards bodies often run public comment phases that feed into international standards — this allows for more localized input. The GHGP is global in reach, but by not facilitating grouped sur-international level considerations and inputs to its public consultation it may not reach as deeply into national/regional stakeholder networks. This is particularly detrimental to potential feedback from regions where stakeholders may lack capacity.

RECS Energy Certification Association, on behalf of our members, appreciates the opportunity to provide this feedback, and we look forward to the GHGP's response.

Yours sincerely,

A handwritten signature in blue ink that reads "Adam White". The signature is written in a cursive, flowing style.

Adam White
Secretary-General