



Protocol Comment Form

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What is the issue or problem with the current Protocol?

Please select one: General Reporting Protocol Certification Protocol

Subject: Reporting Based on Organizational Boundaries

The October 2003 Proposed Draft of the General Protocol proposes some wording changes and a new definition of management control (section 2.0, pp.2-1). There might be some difficulty with the language requiring the reporting of "all of the associated emissions" - it is a bit too broad and might create uncertainty in the certification process.

So three issues are raised in connection with the reporting approach:

1. Language about company's responsibility for 100% of associated emissions;
2. Management control stating that "report based on operational and health safety and environmental policies";
3. The text recognizes the fact that there might be other contractual arrangements between entities but does not provide a specific third option for reporting that is based on some financial or contractual arrangement between parties (different than equity share).

What solution or alternative approach would address this?

We would recommend that the text on pp. 2-1 be amended to read:

"Reporting based on Organizational Boundaries

For those facilities that are wholly owned you should report all the relevant greenhouse gas emissions. For those facilities in which you have a partial ownership share, lease, or hold an operating license, you should have three options for determining the share of emissions:

Option 1 - Management Control: Report 100% of the greenhouse gas emissions from all of the company operations and joint ventures where you have the authority to introduce and implement your operational and environmental, health and safety policies .

Option 2 - Equity Share (unchanged)

Option 3 - Financial/Contractual: Report based on specific contractual agreements you hold (you are responsible for a percentage of the emissions as spelled out in your GHG emissions rights contract or financial obligation)."

How will this proposed solution continue to meet the general spirit and purpose of the Protocol and the Registry, as outlined in the Protocol itself, policies adopted by the Board of Directors and enabling legislation?

The proposed change will eliminate some potential confusion in the certification process. It also highlights the fact that merely having an EH&S policy is not sufficient to ensure management control. Companies need to have the authority in their joint venture arrangements to both introduce and implement their operational and EH&S policies.

Also, incorporating the third option of financial arrangements is a recognition of the emerging role of GHG trading and emission rights contracts. This option is consistent with the current Working Draft of the ISO standard (ISO 14064 Part 1).

Return completed form by email, fax or mail to:
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