



## Protocol Comment Form

Date: 6/20/03

Name: \_\_\_\_\_

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### What is the issue or problem with the current Protocol?

Please select one:  General Reporting Protocol  Certification Protocol

Subject: De Minimis Emissions

The De minimis threshold of 5% is too high. A high de minimis threshold is problematic for the following reasons:

The certifier is responsible for reviewing participant documentation and explanation of how de minimis emissions were calculated to confirm that not more than 5% of total emissions are considered de minimis. If these sources are measured initially they should be included in the inventory.

Making the assumption that a source of emissions is de minimis can sometimes lead to a failure to collect data on a significant source of emissions as well as the loss of an opportunity to find ways to reduce those emissions.

Finally, the issue of materiality is key to setting reduction targets. If a company sets a de minimis threshold that is too high, i.e. not including enough sources or emissions, it will affect the accuracy of the inventory, impact its credibility, and skew the impact of future reduction targets.

### What solution or alternative approach would address this?

A de minimis threshold of 1% would address the issues described above. A lower threshold will lead participants to exclude only sources that are so small that they cannot be measured. If a source is large enough to be measured it should be included in the inventory.

### 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?

This proposed solution will ensure an accurate and complete inventory.

Return completed form by email, fax or mail to:  
California Climate Action Registry  
help@climateregistry.org  
Fax: (213) 623-6716  
515 S. Flower St., Suite 1305, Los Angeles, CA 90071

For Registry use only: