World Business Council for
Sustainable Development

WORLD RESOURCES INSTITUTE

The Greenhouse Gas Protocol

Scope 3 Accounting and Reporting Standard

Comment Template

We are providing this template to streamline public comment submissions. To use this template, please follow the instructions below:

- This Scope 3 draft is open for stakeholder comment from November 11, 2009 through December 21, 2009.
- To provide written comments, please use the comment template provided, instead of sending comments in a separate file or e-mail, in order to streamline the comment process.
- When using the comment template, please organize comments by chapter/section and reference page numbers and line numbers.
- If you have questions during the public comment process, please email Holly Lahd at hlahd@wri.org.
- Submit comments as an attached MS Word file by email to Holly Lahd at hlahd@wri.org no later than **Monday, December 21st, 2009**. We appreciate any effort to submit written comments before the deadline.

Feedback from (name): **Sally Fisk, Christine Visnic, Mary Brown**

Organization: **Pfizer Inc**

Chapter/Section	**Comments**
The outline and overall structure of the document	•
Part 1	
1. Introduction	• **1.4 Relationship to the GHG Protocol Corporate Standard –** we agree that reporting Scope 3 emissions should continue to be voluntary and not required for conformance with the WRI *GHG Protocol Corporate Accounting and Reporting Standard*. Because Scope 3 data quality varies tremendously, it may be in the best interest of some companies to spend time improving the quality of data received from vendors, suppliers, etc. before committing to public reporting. During this data improvement period, companies who continue reporting Scope 1 and Scope 2 emissions pursuant to the Corporate Standard should be considered to be in conformance with the Standard. • **1.6 Relationship to GHG Protocol Product Life Cycle Standard –** we agree

	with the approach outlined here – that implementation of the Product Standard should be optional and not mandatory as part of the Scope 3 Standard. Additionally, we would like to know whether WRI's Scope 3 Standard is consistent with, or otherwise aligns with other standards such as the ISO life cycle assessment standard such that a company that follows ISO would be able to relatively easily adhere to the WRI standard as well. • **1.11 Summary of Requirements in this Standard –** **Reporting Requirements -** Consider separately reporting Scope 3 emissions for sources/activities where there is considerable uncertainty about the underlying emissions data so that stakeholders can see the total emissions that are considered less reliable and compare it to the total emissions where the data is considered more robust and reliable.
2. Accounting & Reporting Principles	•
3. Business Goals & Inventory Design	•
4. Mapping the Value Chain	•
5. Setting the Boundary	**5.3.4 Outsourced activities –** Consider recommending that companies establish a baseline date to determine the cut off between outsourced activities that were previously done in-house.
5.1 Prioritizing Relevant Emissions	•
5.2 Prioritizing Relevant Emissions Based on Size	•
5.3 Prioritizing Relevant Emissions Based on Other Criteria	• **Table 5.1: Examples of Actions to Influence Scope 3 Reductions – Disposal of sold products –** We recommend that companies use disposal practices consider that achieve the least overall environmental impact. The way this section is currently worded, if recycling actually leads to a net GHG increase, but also to a reduction in solid waste that would otherwise go to scare landfill space, WRI is prioritizing one adverse environmental impact over another. • **Table 5.2**: **Examples of climate change related risks –** If these risks are material, they will be reported in a company's SEC disclosures. The GHG inventory is not the appropriate place to talk about these risks unless it has the direct potential to affect emissions or affect the quality of the data used in the accounting.
6. Collecting Data	
6.1. Prioritizing Activities	•
6.2. Assessing Data Sources	•
6.3. Collecting data	• In actuality, it may be difficult to obtain sufficient information from a supplier to estimate a company's percentage of that supplier's GHG emissions. Generally speaking, suppliers outside of the US (and even in the US) are reluctant to provide revenue and/or production volume data to their customers to help

	estimate what percentage of the site's GHG emissions belong to the company. The statement that there should be no significant data gaps does not reflect this "real-world" perspective.
7. Allocating Emissions	**Table 7.3: Allocation Methods By Scope 3 Category –** suggest using square footage as an allocation methodology for leased space rather than mass and volume.
12. Assurance	•
13. Reporting and Communication	**13 Reporting and Communication -** reporting Scope 3 emissions should continue to be voluntary and not required for conformance with the WRI *GHG Protocol Corporate Accounting and Reporting Standard*. Because Scope 3 data quality varies tremendously, it may be in the best interest of some companies to spend time improving the quality of data received from vendors, suppliers, etc. before committing to public reporting. During this data improvement period, companies who continue reporting Scope 1 and Scope 2 emissions pursuant to the Corporate Standard should be considered to be in conformance with the Standard. •
Part 2	
1. Purchased Goods and Services- Direct (Tier 1) Supplier Emissions	•
2. Purchased Goods and Services – Cradle-to-Gate Emissions	•
3. Energy-Related Activities Not Included in scope 2	•
4. Capital Equipment	•
5. Transportation & Distribution (upstream/inbound)	•
6. Business Travel	•
7. Waste Generated in Operations	•
8. Franchises Not Included in Scope 1 and 2 (Upstream)	•
9. Leased Assets Not Included in Scope 1 and 2 (Upstream)	•
10. Investments Not Included in Scope 1 and 2	•
11. Franchises (Downstream)	•
12. Leased Assets (Downstream)	•
13. Transportation & Distribution (Downstream/	•

Outbound)	
14. Use of Sold Products	•
15. Disposal of Sold Products at the End of Life	•
16. Employee Commuting	•
Glossary	•
Any other general comments or feedback	•