



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](mailto:hlahd@wri.org).
- Submit comments as an attached MS Word file by email to Holly Lahd at [hlahd@wri.org](mailto:hlahd@wri.org) no later than **Monday, December 21st, 2009**. We appreciate any effort to submit written comments before the deadline.

**Feedback from (name):** J. Kevin Watson, Ph.D.

**Organization:** NASA Headquarters

Chapter/Section	Comments
The outline and overall structure of the document	•
<b>Part 1</b>	
1. Introduction	<ul style="list-style-type: none"> <li>• 1.11, pg. 10, line 15: FROM: “(see Chapter 13...)”, TO: “(see Part 1 Chapter 13...)”</li> <li>• 1.11, pg. 10, lines 25 and 26: recommend providing a single, authoritative source for CO2-equivalent conversion factors for other GHGs.</li> <li>• 1.11, pg. 10, lines 27 and 28: comment 1: when rolling up Scope 3 emissions through the entire supply chain, it may be very difficult to retain the granularity of differentiation required in these two lines.</li> <li>• 1.11, pg. 10, lines 27 and 28: comment 2: Requiring reporting of each Scope 3 category and calculation via primary/secondary data may not be necessary under the relevance criterion (defined in line 13, page 10). Relevance should include usefulness to decision-makers and should be the overriding factor.</li> </ul>



	Recommend the two bullets in linden 27 and 28 be “shoulds” rather than “shalls”.
2. Accounting & Reporting Principles	•
3. Business Goals & Inventory Design	•
4. Mapping the Value Chain	•
5. Setting the Boundary	•
5.1 Prioritizing Relevant Emissions	<ul style="list-style-type: none"> <li>• 5.1, pg. 18, line 6: FROM: “...relative size and significance,...”, TO: “...relative size and significance (in terms of CO2-e),...”</li> <li>• 5.1, pg. 18, lines 21 through 24 and 26 through 28: These sentences provide latitude in determining relevance. However, the “SHALL” statements in Section 1.11 (page 10) are stated as firm requirements (by virtue of the word “shall”) – thus precluding exercise of discretion. The document should be consistent in either defining firm requirements or allowing discretion latitude. As written it is internally conflicting.</li> </ul>
5.2 Prioritizing Relevant Emissions Based on Size	<ul style="list-style-type: none"> <li>• 5.2, pg. 18, line 36: FROM: “Scope 3 activities”, TO: “Scope 3 sources”</li> <li>• 5.2, pg. 18, lines 36 and 37: Too loosely defined (“...large ... compared to the reporting company’s other sources of emissions.” Would be better if more specific. For example: “ ... relevant if they account for at least X% of a company’s total (Scope 1,2, and 3) emissions.”</li> <li>• Note 7: FROM (e.g., based on purchase spend), TO: (e.g., based on expenditure) UNIVERSAL COMMENT THROUGHOUT DOCUMENT (sometimes currently stated as “total spend”)</li> </ul>
5.3 Prioritizing Relevant Emissions Based on Other Criteria	•
5.4 Summary of Scope 3 Boundary Requirements	•
6. Collecting Data	•
6.1. Assessing data quality	•
6.2. Selecting data sources	•
6.3. Collecting primary data	•
7. Allocating Emissions	•
8. Assurance	•
9. Reporting and Communication	•
13.5 Reporting Form	•
<b>Part 2</b> <i>general comment: numbering is out of sequence</i>	
1. Purchased Goods and Services- Direct Supplier Emissions	<ul style="list-style-type: none"> <li>• Document should provide a rationale for why categories 1 and 2 (direct and cradle-to-gate emissions) are both required. Why would it not be better to just require the cradle-to-gate emissions? That would be more comprehensive.</li> </ul>



	<ul style="list-style-type: none"> <li>• Page 52, lines 12 and 13: FROM: "...multiply the supplier's emissions by the percentage of the reporting company's dollar volume to the supplier's total revenue.", TO: "...multiply the supplier's emissions by the percentage of the supplier's total revenue comprised by the reporting company's expenditure with the supplier."</li> <li>• Box, page 53. The discussion of Calculating Emissions from Shared Facilities provides no guidance on how to address this issue. It just, basically, says that this is difficult.</li> <li>• Box, top of page 54, last word – "significant". Define the criterion for "significant"</li> </ul>
2. Purchased Goods and Services- Cradle-to-Gate Emissions	<ul style="list-style-type: none"> <li>• Page 54, lines 25 and 26: FROM: "...scope 3 emissions from purchased materials are the ...", TO: "...scope 3 emissions from purchased materials <b>and services</b> are the..."</li> <li>• Page 56, lines 32 through 36, Comment: Collecting data directly from Tier 2-n suppliers may become overwhelming and pose contractual interference issues. It would be better to impose a flowdown requirement on the Tier 1 supplier that requires the upflow of data from all lower tiers. All lower emissions contributions should be captured in the rolled-up Scope 3 emissions at each level.</li> </ul>
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 End of Life	•
16. Employee Commuting	•



Glossary	<ul style="list-style-type: none"><li>•</li></ul>
Any other general comments or feedback	<ul style="list-style-type: none"><li>•</li></ul>

