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): **Dawn Rittenhouse**_____

Organization: _____**DuPont**_____

Chapter/Section	Comments
The outline and overall structure of the document	• Clear structure • Scope and limitations of the scope 3 standard should be better discussed. The introduction should clearly state, that different companies cannot be compared based on their published scope 3 GHG emissions. Put a disclaimer in, that standard is not suitable for public policy decisions and competitive comparions. • Provide brief introduction to other standards (e.g. PAS, ISO) • Examples are helpful and it would be beneficial if additional examples could be provided
Part 1	
1. Introduction	• Good overview of existing standards and protocols • Clear definition of scope 1,2, and 3 emissions
2. Accounting & Reporting Principles	• Consistent with other GHG protocol standards

3. Business Goals & Inventory Design	• Description on inventory design is missing?
4. Mapping the Value Chain	• Figure 5: Due to confidentially constraints information on supplier capital investment can hardly be obtained in reality. WRI might consider removing this item. • Table 4.1: distinction between tier 1 and tier 2 is not clear. Table 4.1: There is a contradiction in the terms “direct supplier emissions” versus” emissions from extraction and production of inputs”. In most cases the direct supplier emissions do not include the emissions from extraction. A diagram or an example would be therefore helpful to provide a clear distinction what information is needed from direct (tier 1) suppliers and tier 2 suppliers • Table 4.1: General inclusion of capital investment might be a distraction. Sector specific guidance is needed.
5. Setting the Boundary	•
5.1 Prioritizing Relevant Emissions	• Merit of having a 80% boundary on reportable GHG is not clear. Road testing may show whether this number is reasonable, especially for companies with a very diverse product portfolio.
5.2 Prioritizing Relevant Emissions Based on Size	•
5.3 Prioritizing Relevant Emissions Based on Other Criteria	•
5.4 Summary of Scope 3 Boundary Requirements	• Chapter is currently missing?
6. Collecting Data	•
6.1. Assessing data quality	• 6.1 Prioritizing activities???? • It should be stated whether input/output data can be used to support prioritization process (Box 6.1) •
6.2. Selecting data sources	• 6.2 Assessing data sources???? • It should be stated that the best available data should be used. In most cases it will be primary > secondary > proxy etc. • It is not clear how data modeling will be treated (as proxy???? Or maybe as a separate category). • Page 24: Lines 10: Due to confidentially concerns it may be unrealistic that companies share data on a facility / process level. Road testing should evaluate data accessibility issues in a complex supply chain.
6.3. Collecting primary data	• 6.3 Collecting data???? • Figure 6.2. Primary data may not be the best datasource. Suppliers may communicate wrong datasets out of the fear to be disfavored. It can be therefore valuable to benchmark primary data with literature data and choose the most reliable data source. Include benchmarking process with literature data in the decision tree process?
7. Allocating Emissions	• Not consistent with Product Standard (see Fig 8-4 Allocation Decision Tree on page 54) • Use of direct system expansion, product substitution not clear for scope 3 GHG protocol??? • For each allocation method please provide an example • Table 7.3: Give an example for ”avoid allocation by subdividing process based on supplier knowledge”

8. Assurance	• Chapter 8,9,10,11 are missing? • Chapter 12 Assurance??? • Good coverage. Pilot testing should prove whether it is possible to achieve a level of "reasonable assurance" for a company with a complex product portfolio within a reasonable budget • Site visits of the assurance provider at customer sites may not be realizable (page 54/55)
9. Reporting and Communication	• Chapter 13: Reporting and Communication???? • Page 48 Line 17: "the disclosure of partner GHG emissions in both absolute terms and allocated" is highly unlikely due to confidentiality concerns
13.5 Reporting Form	• Add model data as additional alternative
Part 2	
1. Purchased Goods and Services- Direct Supplier Emissions	• The distinction between direct supplier emissions and cradle-to-gate emissions for tier 2 suppliers should be explained in more detail (e.g. use graphs showing the boundaries for a tier 1 versus tier 2 suppliers) • Page 50 Line 41ff: In general, it will be difficult to obtain direct supplier emissions (confidentiality issues). For cases where tier 1 suppliers are not cooperative, the GHG protocol should allow the use of public cradle-to-gate inventory data even for tier 1 suppliers. It is not realistic to assume that all tier 1 suppliers will cooperate. The GHG protocol must therefore offer alternatives for those cases.
2. Purchased Goods and Services- Cradle-to-Gate Emissions	• Again, alternatives should be provided to be able to summarize the environmental burden for tier 1, tier 2 etc. suppliers to model the supply chain for certain purchased raw materials. • Use of model data (page 56, line 12ff)????
3. Energy-Related Activities not included in scope 2	• How are emissions from exported electricity/steam treated?
4. Capital Equipment	• GHG protocol should recommend industry sectors where capital equipment should be included. • Data references should be given that provide guidance on how to calculate emissions from the production of capital goods
5. Transportation & Distribution (upstream/inbound)	• Use of fuel based methodology is highly unlikely due to the required detail (page 65, line 8ff.) • Page 65, line 17ff: Complex companies cannot calculate the specific emissions for particular shipments. The transportation calculation needs to be performed on a higher level. • Page 65, line 17ff: The determination of quantities and distances for each shipment are not realistic. Complex companies may rather work with global averages. • Page 66, Line 8ff: Utilization factors: difficult to obtain since most transportation services are outsourced
6. Business Travel	•
7. Waste Generated in Operations	• Links to public life cycle inventories for GHG emissions from different EOL options should be included • Page 71 Line 11ff: Calculation for landfill emissions is too simple. Carbon sequestration in landfill is not included. A fraction of the landfill gas is captured in most commercial landfills and either combusted to CO2 or converted to electricity. Furthermore, a distinction should be made for materials that undergo anaerobic digestion and for materials that are inert in the landfill and do not generate methane emissions. The referenced EPA report on modeling

	GHG emission for different waste types may provide further information (http://epa.gov/climatechange/wycd/waste/SWMGHGreport.html)
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)	• Page 77, Line 12: Information on the construction of a franchises will – most likely – be not obtainable
12. Leased Assets (Downstream)	• Page 78, Page 34: Information on the construction of a leased assets will – most likely – be not obtainable
13. Transportation & Distribution (Downstream/ Outbound)	• Page 80, Lines 11ff: 13.1, 13.2, 13.3: Data accessibility is highly unlikely
14. Use of Sold Products	• Links to publicly available use phase emissions (e.g. PCRs) would be helpful since this step is beyond the control of the company • It is not clear how and if intermediate suppliers should perform use phase calculations. This chapter needs additional clarification. Page 80, Lines 32ff: "Reporting emissions from the use of sold products is not required for raw materials and intermediate goods where the eventual end use of the product is unknown. Emissions from the use of sold should optionally be reported for raw materials and intermediate goods, where relevant." •
15. Disposal of Sold Products at End of Life	• Provide references to publicly available GHG emission information for different EOL scenarios • Page 84, Lines 36 ff: "CO2 emissions arising from fossil carbon sources shall be included in the calculation. CO2 emissions arising from biogenic carbon sources shall be excluded. Non-CO2 emissions arising from both fossil and biogenic carbon sources shall be included in the calculation. The GWP factor for non-CO2 emissions originating from biogenic carbon sources shall be corrected to take into account the sequestration of the CO2 that gave rise to the biogenic carbon source." This whole section and the treatment of biogenic carbon and sequestration in general needs some clarification. How is the sequestration of bio-based carbon being treated? => Provide examples for bio-based carbon and sequestration calculations
16. Employee Commuting	•
Glossary	•
Any other general comments or feedback	• Missing: Description of GHG calculation methodology (e.g. 100 yr IPCC time horizon) • Missing: Treatment of biobased carbon and carbon sequestration • Given the complexity of the assessment and the given requirements it is crucial to provide references for publicly accessible LCA inventories for raw materials, recycling, and end-of life scenarios. Otherwise it will be too daunting for a novice to undertake such a kind of assessment => Expand Appendix A