



The Climate Registry

Overview of Changes to the Final General Reporting Protocol

On October 29, 2007, the Registry completed the Draft General Reporting Protocol (GRP) for its voluntary reporting program and released it for public comment. The Registry received comments from over 100 organizations. Public comments ranged from requests for concept clarification, to proposed policy modifications, to suggested technical adjustments. Staff evaluated and incorporated many of the comments to provide greater clarity as well as technical accuracy in the document.

At The Climate Registry's board meeting in January, 2008, the board reaffirmed its support of several key policy principles, and also directed the staff to seek further stakeholder comment on the protocol at a series of public workshops (San Francisco, CA; Washington, DC; Chicago, IL; and Vancouver, BC) in February and March, 2008.

Based on the public feedback from both the public comment process and the workshops, the board meeting, the Programs and Protocol Committee, the Advisory Committee and the Executive Committee, the draft GRP was revised for release.

To assist you in reviewing the Final GRP, staff has highlighted the policies (and technical guidance) that have changed from the Draft to the Final GRP below:

Policy Changes:

1. **Release of Data to the Public:** Facility-level data will be disclosed to the public unless Reporters request an exemption, in which case, their annual emissions will be aggregated to the state or province level across GHGs (by CO₂e). All Reporters must also disclose their entity-level emissions by gas, scope, and type of source (stationary combustion, mobile source combustion, process and fugitive emissions) across countries as well as across North America. All Reporters are strongly encouraged to release their facility data.
2. **Facility-Level Reporting:** Facility level reporting is required, but Reporters are allowed to aggregate data for commercial buildings, mobile sources, and other special cases (oil and gas wells, electricity substations).
3. **Base Year:** All Reporters will establish their base year in the first year that they submit complete GHG data to the Registry. The threshold for updating the base year increased from 3 percent to 5 percent of total entity (Scope 1 and 2) emissions (plus Scope 3, if Reporters are calculating this). Reporters may opt to update intervening years as well as base year data (but this is not required). Reporters that lack the data on a newly acquired company needed to implement a Registry-approved emission calculation methodology may instead use an alternative, simplified estimation method. Reporters

with absolutely no data on acquired company do not have to update the base year for the acquisition.

4. **Simplified Estimation Methods:** The concept of *de minimis* was replaced with the requirement for Reporters to report 100 percent of their emissions. However, instead of Registry-approved emission calculation methods, Reporters may instead choose to use alternative, simplified estimation methods for a portion of their emissions that fall below a threshold. The threshold was also raised from 3 percent to 5 percent of total entity (Scope 1 and 2) emissions. Once emissions are estimated using simplified methods, they need not be re-estimated in subsequent years (unless initial assumptions change). Emissions estimated using simplified methods must be verified as falling below the 5 percent threshold and will be included in the Verifier's assessment of materiality. Verifiers must also gauge whether the estimated emissions are appropriate to be estimated, and if the results appear reasonable.
5. **Government Entity Definitions:** State and municipal governments are strongly encouraged to report at the highest organizational level. Individual state or municipal government agencies may report on their own behalf only if the state/municipality is not reporting in its entirety. Should a state or municipal government begin reporting in its entirety, all components of that government will be subsumed within the state or municipal report.
6. **Transitional Reporting:** The transitional reporting option no longer expires in 2010. Instead, transitional reporting is now allowed for a Reporter's first two reporting years regardless of when they join the Registry. Reporters are now allowed to limit their transitional reports to CO₂ emissions from stationary combustion in one state or province only.
7. **Historical Data:** Minimum reporting requirements for historical data reporting are defined as: at least CO₂ emissions from all stationary combustion sources within at least one state or province. Facility-level reporting is not required. Historical data must be third-party verified, but it is acceptable if the data has been verified by a non-Registry accredited Verifier under another program. Historical data may be imported from other GHG programs as long as it meets above criteria. Historical data will be released to the public and identified as "historical."

Technical Changes:

1. **Categorization of Mobile Source Emissions:** Mobile source emissions can now be classified by geographic region, such that an assignment of these sources to a single state is no longer required. Ground-based mobile sources may be categorized into the following categories:
 - **State/Province Level Reporting:** Emissions from ground-based sources that operate exclusively within a single state, province or territory.
 - **National Level Reporting:** Emissions from ground-based sources that operate across state or provincial boundaries but operate exclusively within one country must be assigned to the country in which they operate.

- **North America Level Reporting:** Emissions from ground-based sources that cross national borders but do not operate beyond Canada, Mexico and the United States must be assigned to a special “North American” category for mobile sources.
- **Worldwide Reporting:** If a Reporter chooses to report its worldwide emissions, their emissions from ground-based sources that operate between Canada, Mexico, and/or the U.S., and other countries (e.g., Mexican fleets that operate throughout Central America) as well as mobile sources that operate exclusively outside Canada, Mexico and the U.S. must be assigned to the worldwide geographic category.

As air- and marine-based mobile sources are difficult to track at the state/provincial level, the Registry allows emissions from these sources to be tracked at the national level unless transport crosses national borders. The criteria for assigning emissions to geographic categories for air- and marine-based mobile sources are as follows:

- **National Level Reporting:** Emissions from air- and marine-based mobile sources that operate entirely within one country must be assigned to that country. (e.g., U.S. domestic flights are assigned to the U.S.)
 - **North American Level Reporting:** Emissions from air- and marine-based mobile sources that operate entirely within North America but not within a single country must be assigned to the North America category.
 - **Worldwide Reporting:** If a Reporter chooses to report its worldwide emissions, their emissions from air- and marine-based sources that begin or terminate outside of Canada the U.S. or Mexico should be assigned to the worldwide geographic category.
2. **Option to Report Non-Kyoto GHGs:** Reporters now have the opportunity to track all GHGs in order to better understand their total emissions footprints.
3. **New, Expanded Definitions of Biomass, Biogenic Carbon, and Biofuels:** The new definitions are provided for greater clarity in defining what is included in these categories. The definitions are:
- **Biofuel:** Fuel made from biomass, including wood and wood waste, sulphite lyes (black liquor), vegetal waste (straw, hay, grass, leaves, roots, bark, crops), animal materials/waste (fish and food meal, manure, sewage sludge, fat, oil and tallow), turpentine, charcoal, landfill gas, sludge gas, and other biogas, bioethanol, biomethanol, bioETBE, bioMTBE, biodiesel, biodimethylether, fischer tropsch, bio oil, and all other liquid biofuels which are added to, blended with, or used straight as transportation diesel fuel. Biomass also includes the plant or animal fraction of flotsam from waterbody management, mixed residues from food and beverage production, composites containing wood, textile wastes, paper, cardboard and pasteboard, municipal and industrial waste, and processed municipal and industrial wastes.
 - **Biogenic Carbon:** Carbon derived from biogenic (plant or animal) sources excluding fossil carbon.

- **Biomass:** Non-fossilized and biodegradable organic material originating from plants, animals, and micro-organisms, including products, byproducts, residues and waste from agriculture, forestry and related industries as well as the non-fossilized and biodegradable organic fractions of industrial and municipal wastes, including gases and liquids recovered from the decomposition of non-fossilized and biodegradable organic material.