



The Climate Registry

General Verification Protocol 1.0 Updates and Clarifications Last Revised: March 2, 2009

The Climate Registry published its first General Verification Protocol (GVP v 1.0) in May 2008. While The Registry intends for the GVP v 1.0 to be a complete document, it recognizes that updates and clarifications will be necessary as the program evolves. Therefore, The Registry created this document to track all modifications relating to GVP v 1.0. This document will be updated as new updates and clarifications are identified.

The updates and clarifications identified in this document will be incorporated into the next version of the GVP, which The Registry anticipates will be released in early 2010. Until the next version of the GVP is released, all Reporters/Members and Verification Bodies should refer to the updates and clarifications listed below for the most current interpretation and explanation of verification policies, processes, and activities.

In order to facilitate identification of policy changes, this document is organized into two sections: "Policy Changes", and "Updates and Clarifications." The policy changes and clarifications are presented in order of the chapters of GVP v 1.0. and not according to the dates issued (although recent updates are highlighted green). In the tables below, "Issued" is the date when the clarification was first issued and "Effective" is the effective date for compliance with the requirement. In most instances, the issued date is the same as the effective date; however, if The Registry issues a major policy change the effective date will allow time for Members and Verification Bodies to plan accordingly.

If you have any questions about the updates or clarifications in this document, or if you wish to request further explanation or clarification of other verification policies, please contact Jackie Huggins at: Jackie@theclimateregistry.org or 201-238-2572.

Policy Changes

Chapter 2.7.4	Other Optional Emissions Data – Verifying Worldwide Emissions	p.19	Issued: 03/02/09 Effective: 03/02/09
	While The Registry continues to require separate reporting and verification of North American emissions, The Registry has rescinded the requirement that verification of worldwide emissions exclude North American emissions. The following sentence should be deleted: "If a Reporter chooses to report their worldwide emissions in addition to their North American emissions, they may contract for verification services with either the same Verification Body that conducted their North American verification, or they may choose another Verification Body."		

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Instead, the following sentences should be added:

“If a Reporter/Member chooses to report their worldwide emissions, they must decide between one of the following two options:

Option 1: The Member may choose to prepare two separate emissions reports, one for North America only and one for non-North America, and have these emissions reports verified separately. The Member must use a Registry-recognized Verification Body for verification of the North American emissions report but may choose a different, ISO 14065-accredited verifier (not necessarily Registry-recognized) for verification of the non-North American emissions report. Each report /verification must conform to The Registry’s criteria (e.g. 5% materiality threshold, 5% threshold for simplified estimation methodologies, etc.). The Member may also choose to have one Registry-recognized Verification Body conduct both the North American and non-North American verifications; however, separate verification statements are still required for each emissions report.”

Option 2: The Member may choose to prepare separate emissions reports, one for North America only and one for worldwide (including North America). The Member must use one Registry-recognized verifier for both reports and separate verification statements must be provided for each emissions report.”

The following sentences should be deleted:

“In either case, the Verification Body must produce a Verification Statement attesting to the accuracy of the Reporter’s worldwide (non-North American) emissions.”

“Since North American and worldwide emission reports do not include overlap, The Registry will consider the Verification Statements for each region to be separate stand alone documents.”

“Since The Registry does not provide specific guidance for worldwide emission calculations, Verification Bodies contracted to verify worldwide emissions do not need to be approved by The Registry.”

This clarification replaces the previous clarification issued on September 24, 2008, which is recited below:

“Since North American and Worldwide (Worldwide emissions minus North American emissions) emission reports do not include overlap (they are geographically distinct), The Registry requires the Verification Statements for both regions (North America or Worldwide) to be separate stand alone documents. Accordingly, Verifiers must apply The Registry’s verification standards, including the application of The Registry’s materiality threshold and the threshold for emissions estimated by simplified methods separately for each region.”

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Chapter 2.7.5	Other (Non-Emissions) Data	p.20	Issued: 03/02/09 Effective: 03/02/09
<p>In order to allow Verification Bodies to focus on the completeness and accuracy of the Member's emissions report, The Registry no longer requires Verification Bodies to verify that the Member has identified the correct Tier for offline calculations.</p> <p>The phrase "(and the associated tiers)" should be deleted so that the following sentence correctly reads:</p> <p>"If the Reporter/Member has chosen to calculate any emissions off-line (rather than using the automated calculation procedures included in the Climate Registry Information System (CRIS)), Verification Bodies must confirm that the Reporter's offline quantification methodologies are appropriate, valid, of a comparable accuracy as those defined in the GRP and are transparently documented in the Reporter's/Member's emission report."</p> <p>The following sentence should be added:</p> <p>"Verification Bodies are not required to confirm that the Member has identified the correct Tier for offline calculations."</p> <p>In Appendix B1: Guidance for Completing Verification Activities (p.72), the following check should be deleted:</p> <p>"29.b. Has the Reporter correctly documented the General Reporting Protocol's tier ranking for each General Reporting Protocol methodology used?"</p> <p>Likewise, in Appendix B2: Standard Verification Report Template (p.82), the following check should be deleted:</p> <p>"21.b. Has the Reporter correctly documented the General Reporting Protocol's tier ranking for each General Reporting Protocol methodology used?"</p>			

Chapter 2.8	Verification Cycle – Verifying Multiple Years of Data	p.21	Issued: 09/24/08 Effective: 09/24/08
<p>In order to have greater consistency with other GHG reporting programs, The Registry has amended its policy so that verification of historical years of data are not counted toward the five-year verification cycle.</p> <p>The following sentences should be deleted:</p> <p>"However, in this instance, each year of historical data verified by a Verification Body will count toward the five year verification cycle. For example, if a Verification Body verified three years of historical data along with the current year's emission report, this will count as four years of a verification cycle. Thus, the Verification Body could only work with this Reporter/Member for one additional year."</p>			

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	<p>Instead, the following sentences should be added:</p> <p>“There is no limit to the number of years of historical data that can be verified during the five-year verification cycle. In other words, historical years of data are not counted toward the five-year verification cycle. For example, if in 2009 a Verification Body verifies a Reporter/Member’s current (2008) emission report in addition to four consecutive years of historic data (2004 through 2007), the Verification Body will have completed only one year of the five-year verification cycle and will be eligible to serve as the Reporter/Member’s verifier for another four years.”</p>
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Chapter 2.8	Verification Cycle – Previous Verification Body-Reporter/Member Relationships	p.21	Issued: 09/24/08 Effective: 09/24/08
	<p>In order to have greater consistency with other GHG reporting programs, The Registry will count a Verification Body’s previous work for a Member through a different GHG program toward The Registry’s five-year verification cycle.</p> <p>The following section should be added:</p> <p>“Previous Verification Body-Reporter/Member Relationships – If a Verification Body has a previous relationship with a Reporter/Member through a different registry or program (e.g. CCAR, CCX, mandatory programs, etc.) then the prior work will count toward The Registry’s five-year verification cycle.</p> <p>The five-year cycle begins at the time the Verification Body is retained by the Reporter/Member for verification services, whether for The Registry or another program. The Verification Body-Reporter/Member relationship must not exceed verification of five (current) reporting years. The Registry does not limit the number of years of historic data that a Verification Body can verify for a Reporter/Member during this five year period.</p> <p>“For example, if a Verification Body has provided verification services to a CCAR Member for two years and the CCAR Member joins The Registry, the maximum number of years the Verification Body will be able to continue to provide verification services to the Reporter/Member under The Registry is three years, even if the Verification Body verified eight years of historic data for that CCAR Member during the past two years. If a Verification Body has provided five years of verification services to a CCAR Member and the CCAR Member joins The Registry, then the Verification Body must wait three years before providing verification services to the Reporter/Member for The Registry.</p>		

Chapter 4.4.4	Selecting a Sample/Developing a Sampling Plan	p.39	Issued: 09/24/08 Effective: 09/24/08
	<p>To ensure consistent interpretation of the GVP by Verification Bodies and Reporters/Members, this section has been revised to specify a minimum (instead of a recommended) number of facilities that a Verification Body must visit.</p>		

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	<p>The term “must” replaces “should” and the phrase “the guidance in” is deleted from the following sentence so that it correctly reads:</p> <p>“Verification Bodies must use Table 4.2 when determining how many facilities to visit to conduct a detailed review of the reported emissions.”</p> <p>The following sentences should be deleted:</p> <p>“The Registry does not specify a minimum number of facilities Verification Bodies must visit.”</p> <p>The remainder of the paragraph should be re-written as follows:</p> <p>“The Registry relies on a Verification Body’s discretion in determining how many facilities it is appropriate and necessary to visit. In making this determination, the Verification Body must consider the minimum number of facilities to be visited as established by The Registry in Table 4.2. If the Verification Body determines that visits to fewer facilities than the minimum number listed in Table 4.2 are appropriate, then the Verification Body must provide justification to The Registry via the Notification of Planned Facility Visits Form. Such justification may include a rationale for aggregating commercial buildings, substations, pumping stations, etc.”</p> <p>To promote consistency with international standards, the following sentences should be added:</p> <p>“The Verification Body should inform the Reporter/Member of the number of facilities it will visit (and whether the number differs from the minimum number of facilities to be visited specified by Table 4.2) during the verification scope discussion between the Reporter/Member and the Verification Body. The number of facilities to be visited should be amended as appropriate as part of the dynamic sampling plan; however, the Verification Body must notify The Registry if the number of facilities to be visited is amended to a number below the minimum listed in Table 4.2 by submitting a revised Notification of Planned Facility Visits Form.”</p> <p>The heading of Table 4.2 should be revised to read: “Table 4.2 Minimum Number of Facilities to be Visited Based on Reporter/Member Size.”</p>
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Chapter 5.6	Completing the Verification Process	p.45	Issued: 03/02/09 Effective: 03/02/09
	<p>To ensure that the emissions data that The Registry accepts consistently conforms to the requirements of our program, The Registry has eliminated the Verification Statement allowance for “Verified with Qualifications.”</p> <p>The following sentence should be deleted:</p> <p>“The Registry will not accept a Reporter’s emission report until it receives a</p>		

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	<p>signed Verification Statement indicating either a ‘verified without qualification; or a ‘verified with qualifications’ assessment.”</p> <p>Instead, the following sentences should be added:</p> <p>“The Registry will not accept a Member’s emission report until it receives a signed positive Verification Statement indicating ‘verified’.”</p> <p>Verification Bodies must use the revised Verification Statement form that is currently posted on The Registry’s website.</p> <p>The Standard Verification Report Template has been updated to eliminate the option of “verified with qualification.”</p>
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Clarifications and Updates

GVP v 1.0	General Verification Protocol Version 1.0		Issued: 09/24/08 Effective: 09/24/08
	<p>The Registry has discovered that some Verification Bodies have been referencing outdated or draft versions of the GVP. To ensure that you are referencing the final GVP v 1.0, please replace any previously downloaded electronic copies of GVP v 1.0 with the document that is currently posted on The Registry’s website.</p>		

GVP v 1.0	General Verification Protocol Version 1.0		Issued: 09/24/08 Effective: 09/24/08
	<p>The Registry has changed its nomenclature from “Reporters” to “Members” to reflect that its Members demonstrate leadership in reporting their footprint to The Registry and to highlight that its Members are participating in a GHG community. To ease this transition in terminology, all references in this document will refer to “Reporters/Members.” The next version of the GVP will reference the term “Members” rather than “Reporters.”</p>		

Chapter 1.2.1	Key Players – Internal Peer Reviewer	p.3	Issued: 03/02/09 Effective: 03/02/09
	<p>Some Verification Bodies have expressed the desire to have their Internal Peer Reviewers observe facility visits.</p> <p>While it is neither The Registry’s intent nor recommendation that Internal Peer Reviewers observe facility visits, The Registry does not prohibit the Internal Peer Reviewer’s observation of the facility visits as long as the Internal Peer Reviewer is strictly an observer and does not engage in verification activities.</p>		

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Chapter 2.2	Verification Process Overview – Corrective Action Review	p.9	Issued: 09/24/08 Effective: 09/24/08
	<p>A step was overlooked in the Verification Process Overview. A new step: Verification Body assesses corrective actions taken by Reporter/Member, should follow Step 8: “Verification Body informs Reporter/Member of reporting errors and allows time for the Reporter/Member to Correct Errors.”</p>		
Chapter 2.5	Materiality – Absolute Value Basis	p.10	Issued: 09/24/08 Effective: 09/24/08
	<p>Some Verification Bodies have requested clarification regarding the term “absolute value basis” in the statement that “The Registry sets this (materiality) threshold at five percent on an absolute value basis of a Reporter/Member’s Direct (Scope 1) and Indirect (Scope 2) emissions.”</p> <p>To avoid any confusion over the implications of the term “absolute value basis”, The Registry has abandoned the this term and has rephrased the sentence as follows:</p> <p>“The Registry sets this (materiality) threshold at five percent (for both understatements and overstatements) of a Reporter/Member’s Direct (Scope 1) and Indirect (Scope 2) emissions.”</p> <p>This clarification also applies to the use of the term “absolute” as used in Chapter 2.6 Risk-Based Approach to Verification (p.17).</p>		
Chapter 2.5	Materiality – Sensitivity Analysis	p.13	To be clarified
	<p>The Registry is in the process of developing further guidance regarding how to conduct a sensitivity analysis as proposed in the following sentence:</p> <p>“If Verification Bodies discover reporting errors, they must determine if these errors, when extrapolated throughout the Reporter/Member’s operations, will result in a material misstatement. This is typically achieved by performing a sensitivity analysis on the error with respect to the total reported emissions.”</p>		
Chapter 2.7.4	Other Optional Emissions Data	p.19	Issued: 03/02/09 Effective: 03/02/09
	<p>The requirements for verification of optional emissions data should be corrected to read as follows:</p> <p>“In general, the Registry does not require optional emissions to be verified. Thus these types of emissions are outside the normal verification scope. Two exceptions to the rule which must be verified are:</p> <ol style="list-style-type: none"> 1. The optional category of Scope 1 and Scope 2 worldwide emissions; and, 2. Equity share consolidation methodology. 		

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Chapter 2.8	Verification Cycle	p.20	Issued: 03/02/09 Effective: 03/02/09
	<p>The Registry requires a full verification if a new Verification Body is selected to assess a Member's emissions.</p> <p>The text in this section should be corrected to read as follows:</p> <p>"While the Registry largely defers to a Verification Body's professional judgment to assess if the Reporter's/Member's organizational structure or emissions have changed significantly after the first year of the verification cycle, The Registry deems the following changes as being material, and therefore as triggering a review on the part of the Verification Body as to whether more comprehensive (or more substantial) verification activities might be required:</p> <ul style="list-style-type: none"> • Base Year emissions are changed or adjusted • A Reporter/Member becomes a "complete" Reporter/Member (no longer a Transitional Reporter) • A Reporter's/Member's emissions change by more than five percent from the previous year's emissions • Other issues as deemed appropriate by the Verification Body <p>A full verification is required if the Member selects a new Verification Body."</p>		

Chapter 2.9	Batch Verification Process – Eligibility for Batch Verification	p.23	Issued: 09/24/08 Effective: 09/24/08
	<p>The criteria for eligibility for batch verification should be corrected to read as follows:</p> <p>"The Registry offers batch verification options to Reporters/Members that have:</p> <ul style="list-style-type: none"> • <i>Not more than 1000 metric tons total CO₂e emissions,</i> • <i>No process emissions; and</i> • <i>Fugitive emissions that comprise less than five percent of the entity's total emissions.</i> <p>"In addition, emissions must originate from only the following sources:</p> <ul style="list-style-type: none"> • Indirect emissions from electricity consumption; • Direct emissions from stationary combustion for heating or cooling; and, • Direct emissions from mobile sources." <p>It should be noted that this clarification does not impede the Batch Verification Body's ability to determine eligibility on a case by case basis.</p> <p>The definition of the term "Batch Verification" included in the Glossary (p. 47) will be amended accordingly.</p> 		

Chapter 2.9	Batch Verification Process – Limited Assurance	p.23	Issued: 09/24/08 Effective: 09/24/08
	<p>The phrase "Reasonable assurance" should be corrected to be "limited assurance," so that the statement correctly reads:</p>		

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	<p>“If the Batch Verification Body is unable to provide a finding of <i>limited assurance</i> of a Reporter/Member’s emissions without visiting a facility, the Batch Verification Body must inform the Reporter/Member that they are not eligible for batch verification.”</p>
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Chapter 3.2	Conflict of Interest (COI) – Cause for Automatic COI Rejection	p.27	Issued: 09/24/08 Effective: 09/24/08
	<p>To clarify The Registry’s intent, the following sentence should be deleted:</p> <p>“The Registry will screen the COI Assessment Form to ensure that any Verification Bodies with high COI are prohibited from conducting verification activities,”</p> <p>and replaced with:</p> <p>“The Registry will review each case-specific COI Assessment Form to ensure that any Verification Bodies with high COI are prohibited from conducting verification activities for the Reporter/Member to which the conflict applies.”</p>		

Chapter 3.3	Assembling the Verification Team	p.31	Issued: 09/24/08 Effective: 09/24/08
	<p>To maintain consistency throughout the GVP, and to reflect The Registry’s true intent, the following sentence should be deleted:</p> <p>“2. A verification team must include at least one Lead Verifier,”</p> <p>And replaced with:</p> <p>“2. A verification team must include at least <i>two</i> Lead Verifiers, one to serve as the Lead Verifier and one to serve as the Internal Peer Reviewer.”</p> <p>In response to feedback from Verification Bodies, the following sentence should be deleted:</p> <p>“5. All Lead Verifiers must have attended a Registry Orientation Session discussing the GVP.”</p> <p>The Registry will continue to offer Verification Orientation Sessions on a regular basis, but the sessions will be optional, not mandatory.</p> <p>To maintain consistency throughout the GVP, and to reflect The Registry’s true intent, the seventh Registry-specific requirement should be amended to read:</p> <p>“7. The work of the verification team must be reviewed by an Internal Peer Reviewer who has not participated in the verification activities. The Internal Peer Reviewer must be a Lead Verifier.”</p>		

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Chapter 5.2	Preparing a Verification Report	p.42	Issued: 09/24/08 Effective: 09/24/08
An incorrect reference appears in this section. The term “B1” should be corrected to “B2” in the following sentence so that it correctly reads: “This template is Appendix <i>B2</i> .”			

Chapter 5.2	Preparing a Verification Report	p.42	Issued: 09/24/08 Effective: 09/24/08
<p>To clarify The Registry’s intent, the phrase “sum (in absolute emissions) of all of the discovered discrepancies” should be replaced with “total discrepancy (in metric tonnes of CO₂e) between the Verification Body’s emissions estimate and the Reporter/Member’s reported emissions,” in the following sentence so that it correctly reads:</p> <p>“The total discrepancy (in metric tonnes of CO₂e) between the Verification Body’s emissions estimate and the Reporter/Member’s reported emissions as well as a percentage of the material discrepancies within a Reporter/Member’s total reported emissions at the entity level (separate totals and percentages must be provided for Scope 1 and Scope 2 emissions).”</p> <p>The previous use of the term “absolute” was not intended to instruct verifiers to aggregate absolute values of errors at facility or unit levels. In other words, it is possible for facility or unit-level misstatements of same-Scope emissions to offset each other as described in Example 2.2 of GVP v 1.0 (p.15).</p>			

Chapter 5.3	Preparing a Verification Statement	p.43	Issued: 03/02/09 Effective: 03/02/09
While Members are required to report all GHG emissions sources and activities within the defined inventory boundary and are required to correct as many misstatements as is possible, The Registry allows immaterial misstatements to remain in a Member’s emissions report. As such, Verification Bodies are not expected to withhold a positive verification statement due to immaterial misstatements or omission of immaterial sources.			

Glossary of Terms	Mobile Combustion	p.49	Issued: 03/02/09 Effective: 03/02/09
<p>The definition of mobile combustion should be corrected to read as follows:</p> <p>“Emissions from the combustion of fuels in transportation sources (e.g., cars, trucks, buses, trains, airplanes, and marine vessels), emissions from non-road equipment such as equipment used in construction, agriculture, and forestry and other sources that emit GHG emissions while moving. A piece of equipment that can be moved from site to site but does not combust fuel while it is being moved (e.g., an emergency generator) is a stationary, not a mobile, combustion source.”</p>			

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Glossary of Terms	Stationary Combustion	p.50	Issued: 03/02/09 Effective: 03/02/09
	<p>The definition of stationary combustion should be corrected to read as follows:</p> <p>“Combustion of fuels in any stationary equipment including boilers, furnaces, burners, turbines, heaters, incinerators, engines, flares, etc.”</p>		
Glossary of Terms	Transitional Reporter/Member	p.51	Issued: 03/02/09 Effective: 03/02/09
	<p>The definition of Transitional Reporter/Member should be corrected to read as follows:</p> <p>“A Registry Reporter/Member that opts to provide a partially complete emission report, covering fewer than the six internationally recognized GHGs (but CO₂ from stationary combustion at a minimum) and/or one or more states, provinces, territories, or Native Sovereign Nations. The transitional reporting option is available only during a Reporter’s/Member’s first two reporting years.”</p>		
Appendix A	Required Forms	p.52	Issued: 09/24/08 Effective: 09/24/08
	<p>The Registry recently updated and improved its verification forms to ease the completion and submission of these forms. The Registry also added a new form to communicate changes in scheduled facility visits. Please always refer to the forms on The Registry’s website rather than those included in Version 1.0 of the GVP, as these are now outdated.</p> <p>Please note that The Registry can receive e-mails only up to 5 MB in size. To ensure receipt of your forms, all forms should be submitted to The Registry in pdf format via the e-mail addresses noted on the forms. This measure should be necessary only for 2007 verification documents, as The Registry will incorporate all forms and submissions into CRIS for 2008 verification activities.</p> <p>The Registry will accept electronic signatures on the required forms.</p>		
Appendix A	Designated Staff, Roles & Responsibilities Form	p.52	Issued: 03/02/09 Effective: 03/02/09
	<p>The Registry requires Verification Bodies to submit a Designated Staff, Roles, and Responsibilities Form prior to initiating verification activities.</p> <p>Added to the list of forms on page 52 should be the “Designated Staff, Roles, and Responsibilities Form.”</p> <p>The updated version of this form is available on The Registry’s website. This form must be submitted in pdf format to The Registry by e-mail to notification@theclimateregistry.org.</p>		

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Appendix A-1	Required Forms – COI-A: Case-Specific Conflict of Interest Assessment Form	p.53	Issued: 09/24/08 Effective: 09/24/08
	<p>Form COI-A has been revised to clarify that:</p> <ul style="list-style-type: none"> - The form should be submitted to COI@theclimateregistry.org - Under Section 4.c. the Verification Body needs to identify previous work that its staff members conducted for the Reporter/Member only within the past three years, including while in the employment of other organizations. - Section 5 on Financial Assessment has been streamlined and updated to request information regarding only the previous three years. <p>The revised form is available on The Registry's website.</p>		