

BCSE Comments on GHGP Actions and Market Instruments Request for Information Survey

June 12, 2026

The Business Council for Sustainable Energy (BCSE) commends the Greenhouse Gas Protocol (GHGP) for its continued role in providing globally trusted emissions accounting guidance and express the organization’s appreciation of the work underway to revise the Corporate Standard, including Scope 2 guidance.

BCSE is pleased to provide perspectives on the direction of the Actions and Market Instruments (AMI) framework, as outlined in the AMI White Paper.

BCSE is a coalition of companies and trade associations from across the clean energy spectrum, including renewable energy, energy efficiency, natural gas, energy storage, sustainable transportation, and emerging low-carbon technologies. Since 1992, BCSE has worked to expand the deployment of sustainable energy solutions through policy advocacy, business engagement, and market-based approaches. Our members include clean energy developers, utilities, large energy buyers, and technology providers, many of whom depend on consistent GHG reporting standards to validate and accelerate climate action.

BCSE Perspectives on Scope 2 Accounting

As clean electricity demand continues to grow, Scope 2 market-based accounting has become one of the most effective tools for empowering organizations to manage their greenhouse gas emissions and to drive investment into low- and zero-carbon generation. The current framework enables credible climate leadership by allowing the use of contractual instruments, such as Energy Attribute Certificates (EACs), to account for purchased clean energy. These instruments are essential to financing new projects and are widely used across public and private sectors.

According to the [2026 Sustainable Energy in America Factbook](#), produced by BloombergNEF in partnership with BCSE, corporate clean energy purchasing had a record year in 2025, with nearly 29.5 GW of long-term power purchase agreements (PPAs) announced in the United States alone. Virtual PPAs represented the majority of this activity, reinforcing their role as a cornerstone of the voluntary clean energy market. These deals rely heavily on the continued eligibility of EACs in Scope 2 market-based accounting and have directly enabled the buildout of large-scale solar, wind, and storage capacity across the country.

The success of these mechanisms is not hypothetical – it is visible in the marketplace. Voluntary buyers have driven more than 100 GW of new clean energy in the United States over the past decade, demonstrating the importance of preserving this pathway. Narrowing the definition or the use of market-based instruments could freeze investment, stall new projects, and undermine broader climate goals.

BCSE strongly urges the GHG Protocol to preserve and strengthen market-based accounting options in the Scope 2 framework and this be carried forward in the guidance for the AMI. We offer the following key recommendations:



- **Maintain the current dual-method approach** that allows entities to report both location-based and market-based emissions. Market-based accounting enables lower-carbon procurement, empowers energy buyers, and supports grid decarbonization.
- **Preserve flexibility in accounting and procurement options** that can be reflected in the scopes, including non-hourly matched unbundled EACs, utility-delivered clean energy, and long-term PPAs from resources operating in the same national market. Additional tools, such as hourly matching or deliverability metrics, can be encouraged as voluntary enhancements but should not become minimum requirements.
- **Protect existing investments** by clearly stating that existing contractual instruments, and instruments procured before the revised guidance has been finalized, will continue to be eligible under revised guidance. This ensures regulatory certainty and honors prior climate commitments.
- **Expand, rather than narrow, participation** by recognizing a wide variety of procurement models that reflect the real-world diversity of energy users and regional electricity and clean fuels markets.

Survey Responses as Part of the Request for Information (RFI) on the development of the Actions and Market Instruments Standard

BCSE welcomes the direction of the proposed multi-statement GHG reporting structure to supplement the revised Corporate Standard. We agree that this should be considered as a supplement and not replace the physical inventory.

Further, the Council believes the four statements capture key needs corporate filers seek, but have several questions and recommendations as the Technical Working Group moves forward with developing its draft guidance.

3.1 Multi-statement reporting structure

16. To what extent do you support or oppose the introduction of a new “multi-statement GHG reporting structure” for GHG reports?

BCSE Response: Support

17. What benefits or challenges do you think that a multi-statement reporting structure could result in?

BCSE Response:

- It fulfils business needs to credibly account for and report on actions and market instruments
- It supports global climate mitigation



- It supports providers of market instruments with a clear framework for developing and communicating instrument claims related to corporate GHG accounting
- It enhances transparency on companies' GHG emissions and climate action for all stakeholders
- It increases comparability between companies
- It increases reporting complexity
- It requires additional resources
- Other:
 - It allows for the transfer of low carbon inputs where direct exclusive physical delivery is commercially, operationally, or geographically impossible
 - It helps ensure a market for new low carbon solutions

18. What changes or improvements would you recommend to increase your level of support for multi-statement GHG reporting structure to inform Phase 2 of the Actions and Market Instruments standard development work? (4,000 character limit)

BCSE Response: AMI represents an important evolution of the GHG Protocol, but several clarifications are needed to support practical implementation and alignment with existing markets and accounting systems.

1. Establish achievable and aligned quality criteria

AMI's approach to quality criteria will be critical. Criteria should align with widely adopted regulatory and voluntary frameworks rather than introducing restrictive or new requirements. While the white paper anticipates that sector, program and jurisdiction-specific guidance will supplement the framework, it also indicates that GHGP will establish its own eligibility and quality criteria in phase 2.

Divergence from existing programs would create uncertainty, reduce transaction eligibility, and hinder investment in low carbon solutions. As such, GHGP should preserve its role as an accounting standard by recognizing existing programs and ensuring sufficient flexibility to accommodate clean electricity and fuel procurement programs and other low/zero-carbon inputs.

2. Clarify treatment of market-based procurement and chain of custody

BCSE welcomes the recognition of contractual and market-based procurement for Scope 1 and 3. However, the current framework lacks clarity on how different chain-of-custody models will be treated. To accelerate decarbonization, the GHG Protocol must ensure that new low carbon inputs can be transferred in a commercially practical way to purchasers who can then recognize the GHG reduction in their Statement 1 or 2 inventory. To ensure consistency with existing frameworks, AMI should explicitly recognize (at a minimum) mass balance and commercial "physical delivery" (e.g., for RNG, priority capacity rights on pipelines) approaches within



physical inventories (Statement 1) and book-and-claim systems within market-based inventories (Statement 2).

3. Ensure robust treatment of lifecycle impacts and impact categories

AMI should ensure that material lifecycle impacts associated with fuels and feedstocks — including methane abatement outcomes from waste-derived pathways — are eligible for recognition within core reporting statements and are not relegated solely to a separate impact statement.

4. Prioritize alignment with existing market and policy frameworks

AMI should define clear reconciliation requirements between physical and market-based inventories to improve consistency, comparability, and auditability across disclosures.

19. Would you like to provide additional feedback on specific elements of the multi-statement GHG reporting structure by answering additional survey questions? Please note that if you select “no” the survey will end.

BCSE Response: Yes

3.2 Purpose, goals and objectives

20. To what extent do you agree with the “Purpose, goals, and objectives” (outlined in Section 4 of the White Paper)?

BCSE Response: Agree

21. Please explain the rationale behind your previous response and add what changes or improvements you would recommend for “Purpose, goals and objectives” (Section 4 of White paper)

BCSE Response: BCSE supports the director of the AMI framework, particularly the focus on enabling companies to account for impactful decarbonization actions that may not be recognized as fitting within the physical GHG inventory.

Of note, a significant portion of emission reductions from waste-derived fuels and feedstocks is currently treated as outside of a company’s physical inventory. These emission reductions are real and quantifiable for fuels such as biogas, where climate benefits are driven not only by fuel substitution but also by upstream impacts. Under existing accounting frameworks, these impacts are often underrepresented or excluded, despite delivering substantial climate benefits.



The proposed multi-statement reporting structure provides an important opportunity to capture and quantify these interventions in a way that complements the physical inventory with additional, decision-useful information that captures the full scope of a company's decarbonization activities. It also reduces the importance of delineating the boundary between physical delivery and contractual/market transactions by recognizing both types of actions. By doing so, AMI better aligns GHG accounting with how decarbonization occurs in practice – through a combination of direct emissions reductions, value chain interventions, and market-based actions.

At the same time, certain language used within the AMI Phase 1 whitepaper such as “protect the integrity of the physical inventory”, may unintentionally reinforce a hierarchy in which impacts outside of the physical inventory are perceived as less credible or secondary.

3.3 Market-based GHG Inventory

22. To what extent do you think the Market-based GHG inventory statement should be included within a multi-statement GHG reporting structure?

BCSE Response: It should be included

23. Please explain the rationale behind your previous response and provide any additional comments on the Market-based GHG inventory statement that should inform Phase 2 of the Actions and Market Instruments standard development work.

BCSE Response: BCSE supports inclusion of a contractual or market-based GHG inventory statement within the reporting structure and agrees that it is complementary to the physical inventory, as it provides important transparency of contractual procurement decisions, chain-of-custody systems, and market mechanisms that influence decarbonization across value chains.

There are limited tools for companies to directly impact their physical emissions. The market-based statement provides a much-needed pragmatic and feasible reporting option for companies to report the emissions of their decisions via contractual mechanisms. Maintaining this statement builds upon the progress and momentum built over the past decade. The market-based statement is already a developed, reasonably understood, and relied upon reporting mechanism for companies and target setting bodies, supporting billions of dollars in clean power investments.

Further, market-based interventions are recognized by target-setting bodies as critical to a company's progress towards their climate commitments. The GHGP continues to play a critical role ensuring clear, consistent and reliable guidance to accounting for market-based interventions, including the tools used to measure progress towards these targets.



The inclusion of contractual and market-based approaches for inputs to Scope 1 and Scope 3 emissions appears to be a positive evolution of GHG accounting. This issue is particularly important for biogas and clean fuel pathways, where bilateral contractual procurement and environmental attribute markets play a key commercial role in connecting supply with demand and thereby enabling investment and scalability of production.

At the same time, additional clarity will be essential in Phase 2 regarding how different chain-of-custody models will be treated within the AMI framework. The whitepaper references recognition of contractual purchases, indicating that the framework “allows chain-of-custody models” within both physical and market-based inventories. However, the delineation between approaches remains unclear. BCSE encourages clear guidance to be developed that outlines the recognition and acceptance of both mass balance and book-and-claim. A workable and pragmatic approach would for example, be to recognize mass balance within the physical inventory while allowing book-and-claim systems within the market-based inventory. Also, transactions where the purchaser contracts for the physical commodity along with all environmental attributes (i.e., bundled transactions) should be recognized in Statement 1.

Additional clarification would also be helpful regarding the statement that the market-based inventory “may incorporate existing scope 2 market-based method” while “introducing new approaches for scope 1 and scope 3”. As these approaches are developed, stakeholder engagement across affected sectors will be important to ensure consistency, usability, and compatibility with existing reporting systems and certification frameworks.

3.4 GHG Impact Statement

24. To what extent do you think the GHG impact statement should be included within a multi-statement GHG reporting structure?

BCSE Response: It should be included

The impact-based Statement 3 is a crucial component of this new 4-statement structure. It moves beyond traditional inventory accounting and uses consequential methods to robustly measure the emissions impact of a company’s actions.

Measuring emissions impact with the impact-based statement provides a valuable investment signal incentivizing a full range of actions needed for decarbonization, beyond what an inventory alone can incentivize. For example, technologies like storage, transmission improvements, or other carbon-reducing technologies aren’t efficiently valued today without EACs. Further, the impact statement shows where and when organizations can reduce the most emissions, and recognizes high-impact decisions.



25. To what extent do you agree with the proposed sub-categories for the GHG impact statement?

BCSE Response:

1. Within organizational boundary impacts – **“It should be included”**
2. Value chain associated impacts – **“It should be included”**
3. Sector associated impacts – **“It should not be included”**
4. Beyond value chain and sector (global) impacts – **“It should not be included”**
5. GHG impacts of sold products – **“It should not be included”**

26. Should any of the GHG impact statement sub-categories be merged for simplification and greater clarity?

BCSE Response:

1. None should be merged
2. Within organizational boundary impacts should be merged with value chain associated impacts
3. Within value chain associated impacts should be merged with sector-associated impacts
4. Sector-associated impacts should be merged with Beyond value chain and sector (global) impacts
5. Value chain associated impacts should be merged with GHG impacts of sold products
6. **Other – should just be the first two**

27. To what extent do you agree or disagree that consequential reporting approaches within the GHG impact statement should reflect both positive and negative impacts of actions?

BCSE Response: Agree

28. How should GHG impacts of sold products (e.g. avoided emissions) be treated in the GHG impact statement?

BCSE Response: It should not be included in the GHG impact statement

29. Please explain the rationale behind your responses in this section and provide any additional comments on the GHG impacts statement that should inform Phase 2 of the Actions and Market Instruments standard development work.



BCSE Response: BCSE supports the inclusion of consequential approaches within the GHG statement and agrees they should reflect both positive and negative impacts associated with the specific actions identified. A balanced treatment and approach to these impacts is critical to ensure the framework accurately reflects real-world climate outcomes.

At the same time, BCSE encourages the GHGP to carefully balance completeness with usability in the design of the impact statements. There is growing concern across stakeholders, including reporting entities and developers, that increasing complexity in GHG accounting frameworks hindering the ability of companies to measure, interpret, and communicate emissions performance.

In this context, BCSE recommends that phase 2 prioritize a streamline structure with minimum number of impact categories necessary to meaningfully distinguish between types of impacts rather than adopting a highly granular or overlapping categories. As such, with respect to GHG impacts of sold products, including avoided emissions, BCSE does not support the inclusion within the GHG impact statement.

BCSE also believes that participation in the impact statement framework should remain optional, consistent with the GHGP's role in supporting compatibility across voluntary initiatives, corporate target-setting frameworks, and regulatory programs. Many regulatory systems already define accounting boundaries differently (e.g. US RFS, California LCFS, Canada CFR, etc.) and introducing mandatory reporting layers risks creating misalignment and confusion in markets where compliance obligations are well-established.

Finally, BCSE encourages the GHGP to carefully consider importing decisions from other guidance into the AMI standard. In particular, the recently published Land Sector and Removals Standard contains determinations that may not be applicable to the global economy wide AMI work.

Also, the current requirement to report certain consequential effects, such as indirect land-use change (iLUC), within Scope 3 raises important questions about how similar effects will be treated under the emerging GHG impact statement framework. Ensuring internal consistency across standards will be critical to developing a coherent, implementable, and credible accounting system.

3.5 Non-GHG Indicators

30. To what extent do you think the Non-GHG indicators statement should be included within a multi-statement reporting structure?

BCSE Response: It should not be included

31. What level of detail should the AMI Standard provide for Non-GHG Indicators?



BCSE Response: Other - none

32. Please explain the rationale behind your responses in this section and provide any additional comments on the Non-GHG indicators statement that should inform Phase 2 of the Actions and Market Instruments standard development work.

BCSE Response: BCSE recognizes the importance of non-GHG indicators in providing a broader understanding of an organization's overall environmental performance. However, BCSE encourages GHGP to remain focused on its core role as a greenhouse gas accounting standard in the development of the AMI framework.

3.6 Concluding Questions

33. If you have any other comments and remarks about the White Paper that should inform Phase 2 of the Actions and Market Instruments standard development work, including specific examples or case studies that you believe should be explored, please provide them here

BCSE Response: BCSE supports GHGP's work to ensure the 4-statement structure is fully implementable within existing carbon reporting standards and compatible with leading target-setting bodies. This alignment will allow AMI measurements to be seamlessly integrated into broader climate goals, such as SBTi targets. However, practical implementation hinges on providing explicit guidance regarding the specific claims permissible under each statement, and how they may be used (whether that be together or in parallel).

In addition, AMI should consider the following resources as it heads into Phase 2 of the AMI Standard development process:

Impact Accounting Framework, Molecule Group – This framework bridges the gap between AMI's "GHG impact statement" and life cycle accounting for sustainable fuels, chemicals, and materials. Slated for publication in December 2026, it provides guidance for key impacts related to sustainable fuels such as avoided methane, bioenergy with carbon capture and storage, recycled carbon, carbon sequestration in materials, indirect land-use change, and regenerative agriculture practices. Molecule Group can produce a draft version of this document for the AMI working group upon request.

High-Level Recommendations, Let Green Gas Count – This document serves as a starting point to develop quality criteria surrounding renewable gas procurement (<https://letgreengascount.org/>).

Carbon Accounting for Sustainable Biofuels, International Energy Agency – This report describes the importance of life cycle carbon accounting as a way to differentiate between positive and negative biofuel production pathways. It includes a robust discussion of various "out-of-scope" interactions



that should be incorporated into GHGP's forthcoming impact statement. Molecule Group's Impact Accounting Framework is designed to provide specificity that bridges the gap between these interactions and the forthcoming AMI Standard.

Belem 4X Pledge on Sustainable Fuels, COP 30 – The recent global sustainable fuels pledge was developed via partnership between Brazil, International Energy Agency, and Clean Energy Ministerial, among others, and outlines key policy developments necessary to grow sustainable fuels technologies. Included in the Pledge are policy priorities that implicitly reference to the GHGP and ongoing AMI process, such as “Seek to align domestic and international carbon accounting frameworks” and “Promote a coordinated implementation of carbon accounting principles and standards to support the interoperability of different frameworks” (https://www.gov.br/mre/en/contact-us/press-area/press-releases/launch-of-the-belem-4x-pledge-on-sustainable-fuels/2025-10-23_cop30-declaration_sustainable-fuels.pdf).

Conclusion

BCSE supports the direction of the AMI and supports the 4-statement structure as outlined in the White Paper. However, additional clarifications are needed regarding the status of the statements that will enable more specific feedback on this framework. Specifically, will all or a subset of these statements be required by filers? This information is critical to determine the feedback on each statement and its guidance. The GHGP should provide clear guidance on how these statements may be used in a practical and feasible way compatible with target setting. Thank you for your consideration. We look forward to continued engagement and stand ready to assist in any way as the revision process moves forward.