

25/07/2025

To:

Pankaj Bhatia, Co-Director, Greenhouse Gas Protocol (WRI)
Maia Kutner, Co-Director, Greenhouse Gas Protocol (WBCSD)

Subject: Follow up Request for Strategic Action Regarding Market Instrument Guidance and Interim Clarity

Dear Ms. Kutner and Mr. Bhatia,

We write further to our joint letter of 11th June on behalf of the *Let Green Gas Count* Coalition, to raise an important matter that has been brought to our attention. By way of a reminder, the Coalition represents the interests of over 200 producers and users of renewable gas who wrote to you earlier this year to urge you to address the gap in guidance for the use of market-based instruments in Scope 1 reporting. This lack of guidance has now been in place for over five years and continues to significantly harm our industry and the industries that need renewable gas to decarbonise.

We have been monitoring the progress of the Actions and Market Instruments Technical Working Group (AMI TWG) with interest. Where possible, we have been supporting the AMI TWG members to ensure that the current gap in guidance preventing the use of green molecules in the decarbonisation of Scope 1 emissions is addressed as rapidly as possible.

We were extremely concerned to hear that Michaela Wagar, who was acting as the secretariat support for the AMI TWG, left the World Resource Institute before the delivery of this important workstream. Further, we understand that as a consequence of this change in personnel, meetings previously intended to progress this workstream in Q3 of this year have been indefinitely postponed. This jeopardises WRI's ability to deliver its summary consultation before the end of this year as it was originally promised.

The continued delay to develop a new guidance is increasingly harming the green gas industry, we therefore ask you to confirm the following:

- That the WRI still intends to publish its summary consultation on the AMI workstream in Q4 2025 as originally set out on the *Let Green Gas Count* webinar in February.
- That this summary consultation will include clear and practicable draft guidance on the use of certification within Scope 1, bringing the renewable gas accounting approach in line with the one for renewable electricity.

As per our previous correspondence, if you are unable to confirm either of the above statements then we would again reiterate the need for an interim statement on the use of market-based instruments for pipeline-injected renewable gas in scope 1 reporting to be published no later than Q3 of this year. The purpose of this statement is to provide certainty to markets that the revision will ultimately recognise robust market-based instruments, while the detailed rules are developed through the established revision process. As set out in my previous letter, your governance procedures allow for such a statement to be approved by the Steering Committee, as and when necessary.

We look forward to your prompt response to our letter of 11th June which set out this process and the points raised above.

With sincere regards,

On behalf of the Let Green Gas Count coalition

Charlotte Morton OBE, CEO, World Biogas Association

Harmen Dekker, CEO, European Biogas Association

Andreas Guth, Secretary-General, Eurogas

Johannes D. Escudero, CEO, Coalition for Renewable Natural Gas

Rafik Ammar, Policy Director, eNG Coalition