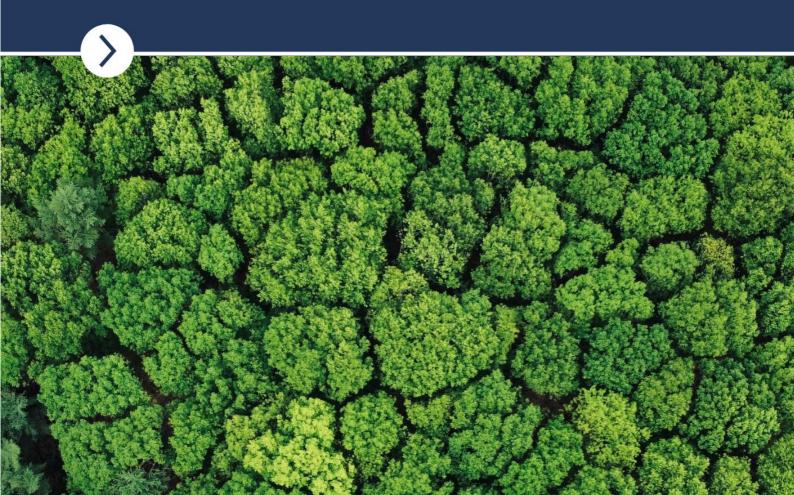
HIGH LEVEL RECOMMENDATIONS

Ensuring transparent and harmonized recognition of renewable and low-carbon gases in the GHG Protocol and corporate accounting frameworks



Following the Let Green Gas Count campaign, this document provides high-level recommendations to support the transparent and harmonized recognition of renewable and low-carbon gases, such as biomethane/renewable natural gas (RNG) and emethane/e-natural gas, in greenhouse gas (GHG) accounting systems, including the GHG Protocol.

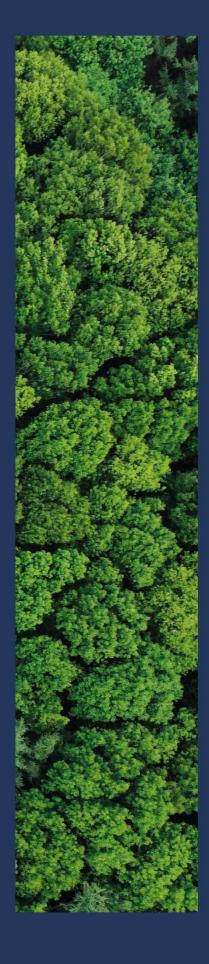
It aims to act as <u>interim guidance</u> while GHG Protocol publishes its standard.

These recommendations are informed by existing certification practices and the operational realities of renewable gas markets, and aim to:

- Support the development of shared quality criteria for certificate-based claims.
- Clarify how life-cycle emissions of renewable gases should be calculated and reported.
- Guide corporate users on how to correctly report associated emissions (Scopes 1, 2, 3) using market-based instruments.

The <u>harmonization of GHG</u> accounting for renewable gases is essential for unlocking their climate mitigation potential. The recognition of market-based instruments, the use of standardized quality criteria, and clear guidance on emission types and reporting practices will help ensure:

- Credible corporate disclosures.
- Interoperability across different jurisdictions.
- Stronger investment signals for renewable gas deployment.





SIX QUALITY CRITERIA FOR CERTIFICATES AND CLAIMS

To ensure environmental integrity and prevent double counting, the following quality criteria are recommended for any renewable gas certificate used to support environmental claims:

Criterion	Description
1. Unique claims	No double claims or double issuance; certificates must
	be uniquely assigned to a reporting entity.
2. Tracking and retirement	Certificates must be retired or cancelled once claimed,
	ensuring traceability through credible and verifiable
	mechanisms.
3. Production data	Certificates should include gas production data to
	ensure traceability and to prevent the risk of retroactive
	or backdated claims.
4. Market boundaries	The geographic scope of valid claims must be defined
	(e.g., interconnected infrastructure or mutual
	recognition among countries).
5. Chain of custody model	Certificates must disclose the production point with
	auditable mass balance, book-and-claim, or physical
	segregation systems.
6. Verification	Third-party verification schemes should be used to
	ensure independent validation of certified
	environmental attributes.

These principles reflect best practices in existing European, North American, and international frameworks (e.g., EU RED, US EPA RFS, CA LCFS, CleanCounts, I-TRACK Foundation, ISO 22095).

Residual mix

With a share of 10% or more of renewable gas in any gas grid, to use contractual instrument under the market-based method, it is recommended that an adjusted residual mix characterizing the GHG intensity of the unclaimed or publicly shared gas be made available for the consumer's scope 1 or scope 3 calculations, or its absence should be disclosed by the reporting entity. If the adjusted residual mix is not declared, consumers should not claim the use of renewable gases in their inventories unless the associated environmental attribute certificates are retired by the consumer on their behalf.



Certificates

A voluntary certificate, PoS, RTC, or other types of environmental attribute certificate issued under a certification scheme typically includes:

- GHG emission values (typically cradle-to-gate or cradle-to-grave CI);
- Feedstock type and origin;
- Production process;
- Compliance with sustainability criteria;
- Certificate vintage (production date).

These certificates serve as auditable documentation for reporting purposes and are often linked to registries ensuring the integrity of the issuance and transfer to counterparties (e.g., national GO registries, EU Union Database, US EPA's EMTS system, Evident, SISGASREC or Clean Counts). While registries are one way to handle certificates, other credible verification mechanisms can also be used (e.g., decentralized blockchain-based systems).

Life-Cycle emissions (LCA) of renewable gases

Most of the renewable gas certificates are based on life-cycle greenhouse gas (GHG) assessments that quantify the emissions associated with the full supply chain of a given renewable gas consignment. This includes but is not limited to:

- Feedstock sourcing (e.g., manure, agricultural residues, organic waste);
- Emissions from processing (e.g., anaerobic digestion, upgrading);
- Transport and injection into the grid;
- · Combustion emissions at the point of use.

The resulting Carbon Intensity (CI) is typically expressed in gCO₂e/MJ or tCOE₂e/MT and can be broken down into scope categories for inventory accounting. These values are calculated according to recognized methodologies (e.g., RED II/RED III, GREET, ISO 14067) and verified through certification schemes such as ISCC+, RSB, REDcert, QAP, GAS-REC, I-TRACK(G), Green Gas Certification Scheme, etc. It is important to note that not all certification schemes are voluntary, where certain programs are mandated by regulatory bodies to ensure compliance with specific standards and practices.

CI and/or emission factors should be transparently calculated via recognized LCA standards.

Biogenic emissions

Biogenic CO_2 refers to carbon released from biological sources, such as crops, waste, or manure, that would have returned to the atmosphere in a short timeframe regardless of its use as a feedstock (i.e., through natural decomposition). When combusted, biogenic CO_2 is considered carbon neutral, therefore it is not included in Scope 1 emissions and is instead reported separately outside the scopes for transparency.

Avoided emissions

Avoided emissions occur when a renewable gas project prevents higher emissions that would otherwise occur. For example, capturing methane from manure or landfills that would otherwise be vented. Avoided emissions are often included in LCA, but are currently not reported in the core scopes of a GHG inventory, and may be disclosed separately via market-based or project-level approaches. Given ongoing GHGP developments, a new reporting category may soon formalize this.

Companies should report avoided emissions in corporate disclosures, when supported by high integrity data and considering the ownership of any environmental asset as a way of avoiding double beneficiary.



REPORTING GUIDANCE FOR AUDITORS AND CERTIFICATE USERS

To ensure consistency and transparency, users of biomethane, e-methane, hydrogen, CO₂, biogas, and their derivatives or other renewable gas certificates should follow these reporting principles:

Overall Principle

Market-based reporting using certified instruments meeting the above-mentioned quality criteria should be permitted in scopes 1 and 3, with disclosed emissions values and appropriate quality criteria.

Biogenic Emissions – Reported Outside of the Scopes

- Biogenic CO₂ emissions coming from the combustion of biologically-derived renewable gas should be reported separately from the applicable scopes, as transparent information only, consistent with widely accepted carbon accounting principles and existing GHG Protocol guidance.
- This treatment reflects that biogenic CO₂ is carbon neutral, and that the use of biologically-derived fuels lowers the consumer's scope 1 emissions when compared to using and combusting fossil fuels alternatives like natural gas.

Scope 1 – Direct Emissions

Non-CO₂ emissions from the combustion of renewable gas (e.g., CH_4 , N_2O) should be reported using standard emission factors or actual values, based on measurement.

Scope 3 – Upstream Emissions

- Upstream emissions from processing and transport (Scope 3, Category 3) should be determined by the lifecycle CI of the gas and should reflect the purchased attributes of the renewable gas or derivative product.
- For broader Scope 3 reporting, we recommend that market-based accounting approaches, including book-and-claim systems, be explicitly permitted.

Impact Reporting Category

- Reporting entities may report upstream emissions benefits that occur based on processes like methane avoidance or bioenergy with carbon capture and storage (BECCS) (see section "Avoided emissions above) in an "Impact" category.
 This category is separate from the consumer's scopes, but reflective of the lifecycle impacts of the purchased renewable gas. It should remain optional.
- This treatment will allow consumers to prioritize the most impactful renewable gases, and provide funding for additional, significant emissions benefits upstream. The current GHGP treatment of such upstream benefits as a "carbon offset" does not sufficiently represent their close relationship to the product.

Public Claims

- Companies may claim the use of renewable gas for volumes covered by certificates on 1:1 basis.
- This allows companies to set targets such as "X% use of certified renewable gas by [Date]" (e.g., 100% use of certified renewable gas by 2040), and to make credible claims such as "[Company X] has sourced X% of their gas usage from certified sustainable sources in [Date Range]" (e.g., Company X has been sourcing 30% of their gas usage from certified sustainable sources in 2025) when the use of gas is supported by certificates.
- This also allows corporates to claim some emissions reductions. A potential
 example of such claim is: "Company X, sourcing 30% of their gas usage from
 certified sustainable sources supported by certificates in 2025, can claim a 30%
 reduction of their Scope 1 emissions from their inventory (with the corresponding
 emissions from combustion reported separately as biogenic)".
- Emissions reductions or "renewable gas use" should be clearly disclosed through the attributes of the certificate; they should not have to be counted toward offsetbased net-zero claims, unless if decided so by the user following specific offset standards.





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