

09/04/2026



To:

David Kennedy, Chief Executive Officer, Science Based Targets Initiative (SBTi)

Subject: Recognising market-based approaches for renewable gasses in Scope 1 emissions reporting

Dear Mr Kennedy,

We write to you on behalf of economic operators globally responsible for the production, technology provision, trading and/or consumption of **renewable gaseous fuels**¹ and their derivatives, committed to fully unlocking their sustainable and GHG emissions savings potential. Renewable gases have a central part to play in achieving tangible emissions reductions, through facilitating the decarbonisation of hard to abate industry, transport and building sectors.

We therefore strongly **recognise** and **value the role of the SBTi's** in enabling companies to develop effective decarbonisation strategies, through the Corporate Net-Zero Standard and the comprehensive guidance, criteria and recommendations it provides. At the same time, continued uncertainty surrounding market-based approaches for renewable gases is placing a clear cap on the contributions the sector can make towards corporate net zero strategies.

A key advantage of renewable gases is their ability to leverage the widely interconnected and already-built infrastructure that exists, enabling efficient delivery of clean fuels without the need for new or dedicated transport systems. By not allowing market-based instrument approaches, we fail to capitalise on these efficiencies and create economic, technical and environmental costs associated with transporting renewable gases in other ways. Market-based instruments ensure that a strong business case for renewable gases exists, providing the financial **support** needed for **the continued deployment of proven decarbonisation technologies**.

Under internationally recognised emissions accounting frameworks, such as the Greenhouse Gas Protocol, however, there is a lack of guidance and standards for the use of market-based approaches in Scope 1 inventory reporting. This is **severely holding back the sector**, despite the strong demand of end-users seeking to incorporate renewable gases within their net-zero strategies.

¹ Includes hydrogen, biogas, biomethane, and e-methane.

We are therefore encouraged to see that the SBTi is considering² the use of ‘contractual instruments’ that convey the energy attributes of purchased low carbon fuels or feedstocks for Scope 1 reporting. With effective implementation, this could provide the clarity and confirmation needed by the sector and corporate end-users, driving increases in investments and purchases of renewable gases.

The **Let Green Gas Count**³ coalition calls on the SBTi to continue this work and leadership in ensuring the **recognition of market-based instruments for the purpose of reducing Scope 1 emissions**. We stand ready to engage on this issue with the SBTi and would welcome the opportunity to discuss in further detail how a finalised V2 Standard can best accommodate renewable gases in practice and unlock the **sector’s** decarbonisation **potential**.

Respectfully,

*The **Let Green Gas Count** coalition*

² As outlined in the consultation on the draft Corporate Net-Zero V.2 standard.

³ <https://letgreengascount.org/>