June 28, 2026

GHG Protocol Must Align with Global Markets via AMI Standard

Recognizing LCA and life cycle impacts is necessary to ensure consistency with widespread best practices

To the Members of the Actions & Market Instruments (AMI) Working Group:

The undersigned entities are global economic operators responsible for the production, trading, transport, and consumption of renewable gaseous fuels and their derivatives.[1] This letter was organized by the Let Green Gas Count Campaign as a follow-on to previous communications[2] regarding the urgent need to reflect purchases of renewable gaseous fuels within the Greenhouse Gas Protocol (GHGP), and conveys priorities of the renewable gaseous fuels industry in response to the Actions & Market Instruments (AMI) White Paper.

The renewable gaseous fuels industry appreciates the direction of the GHGP in developing a framework that will support contractual purchases, however we remain concerned that outstanding uncertainties within the AMI White Paper could lead to the development of an unworkable standard. **In completing Phase 1 of the AMI process, GHGP has an opportunity to align treatment of renewable gaseous fuels with long-standing best practices that are common across existing regulatory and voluntary market policies.** With this in mind, we urge GHGP to:

1) Uphold Recognition of Contractual Purchases and Clarify Chain-of-Custody Treatment

GHGP must uphold recognition of contractual purchases and provide additional clarity regarding how varying chain-of-custody models fit into the physical vs. market-based inventories.

The AMI White Paper indicates that GHGP will recognize contractual purchases across scopes 1, 2, and 3. This represents significant progress toward alignment between GHGP and established practices. Varying chain-of-custody models which apply to renewable gaseous fuels purchases will be reflected in the physical and market-based inventories,[3] however, additional clarity is required.

2) Set Achievable Quality Criteria that Include Existing Market Practices

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[1] These include but are not limited to biomethane, hydrogen, e-methane and CO_2. They are used as fuels and feedstocks for applications such as sustainable aviation and maritime fuels and carbon-based chemicals and materials.

[2] https://letgreengascount.org

[3] The white paper describes recognition of contractual purchases ("allows chain-of-custody models" - pg. 5) in both the physical and market-based inventories.

GHGP must set quality criteria that are sufficiently high-level to encompass established practices across existing regulatory and voluntary programs.

The AMI White Paper describes possible quality criteria for activities that fall within the AMI Standard, which would cover renewable gaseous fuels, and are set to be established in Phase 2. Mandating quality criteria that are overly restrictive would immediately and severely limit the volume of transactions that can be reflected under GHGP. This level of misalignment could render the standard unusable for certain sectors.

LGGC has developed the "High-Level Recommendations"[4] as a starting point for this discussion with the AMI Working Group.

3) Design an Impact Statement that Enables Reporting of Upstream Benefits and Disbenefits

GHGP must develop its new impact statement in a way that enables transparent reporting of the renewable gaseous fuels based on life cycle assessment (LCA).

LCA is widely utilized across regulatory and voluntary programs to (1) assure that sustainable fuels & feedstocks reduce emissions compared to their fossil fuel counterparts, and (2) realize the broad climate and environmental benefits that these technologies can achieve by valorizing consequential impacts. If GHGP wishes to align itself with functioning markets, it will be crucial for the AMI process to develop a concept for recognizing and valuing lifecycle impacts associated with molecules.

Interoperability with Existing Regulatory and Voluntary Markets is the Goal of LGGC

The international climate community and energy regulators have endorsed LCA and market-based purchases on a widespread basis to support the growth of renewable gaseous fuels. There are many examples of long-standing, successful programs that employ these tools; the AMI process represents an opportunity for overdue alignment between GHGP and renewable gaseous fuels markets on a global basis.

It is the primary goal of the Let Green Gas Count Campaign to support interoperability between the GHGP and existing markets. If this does not happen, GHGP will be unusable for a wide swathe of technologies that are fundamental for reaching net zero.

The window to get this right is narrow. We urge GHGP to complete this work in a way that reflects the investments companies are already making - and the progress the world urgently needs. **We look forward to continued engagement with the AMI Working Group and GHGP to this end.**

This letter represents the collective views of the signatories but it should be recognised that individual signatories may express points differently or make additional points in connection with the AMI consultation.

[4] https://www.worldbiogasassociation.org/wp-content/uploads/2025/08/Recommendations-Let-Green-Gas-Count-August-2025.pdf

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