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**GHG Protocol Initiative**  
**Evaluation of Draft Public Sector Protocol**  
*Please email this to [pspcments@wri.org](mailto:pspcments@wri.org)*

**Introduction**

Thank you for agreeing to review the Public Sector Protocol (PSP). Your feedback is very important to us and will help ensure that the PSP offers relevant and useful guidance to federal, state and local government agencies. Please consult our project website for updates on the review timeline and for copies of the PSP draft.

**General considerations for reviewers**

In reviewing the PSP you should consider overarching issues that have bearing on the overall utility of the PSP. We have suggested the following questions to help you frame your analysis:

- Does the PSP meet the needs of different users of GHG information; for example, internal management, the public, GHG reporting programs?
- Does the PSP apply with equal effectiveness to federal, state and local operations? If not, what additional guidance is needed?
- Has the correct balance been struck between flexibility and comparability?
- Has sufficient information been included to help you prepare a GHG inventory? If not, what suggestions do you have for improvements (e.g., more detailed guidance, improved definitions of reporting boundaries, etc.).
- How much of the information needed to develop a GHG inventory is already being collected by your organization and through what procedures?
- The PSP contains case studies intended to illustrate the application of major GHG accounting concepts and of GHG management strategies. Are these effective? Can you think of more relevant case studies?
- Is the current organization/ordering of guidance within the PSP appropriate?

We have also suggested some more specific questions below. These should not be interpreted as defining the scope of your review - instead, we encourage you to provide feedback on any aspect of the PSP, including those not addressed by these more specific questions.

**Contact**

Please address any questions or comments about the stakeholder process to [pspcments@wri.org](mailto:pspcments@wri.org) or to Stephen Russell (202) 272 7702 or Mary Sotos (202) 272 7627.



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### Information on Participating Stakeholder

(1) Name of Organization:	
(2) Name(s) of reviewers:	
(3) Description of Organization: (incl. size)	
(4) Have you previously constructed a GHG inventory? If yes:	
(4a) What were the key drivers for constructing a GHG inventory in your organization? Who do you consider to be the key audience for the information?	
(4b) What value, if any, did the process of constructing an organizational GHG inventory have for your organization? (if possible please provide examples)	



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## Questions on specific guidance within the *PSP*

### Introduction

1. The *PSP* states that the “decision-making regime” for public agencies may be more complicated than that of the private sector, since public agencies must address a wider range of considerations, including “public good, regulations, compatibility with international agreements,” etc. Is this an accurate statement? (*Introduction, x*).

### Chapter 1: GHG Accounting and Reporting Principles

2. Are these principles useful? Should they be more prescriptive (e.g., specify materiality in numerical terms)? Have we missed anything?

### Chapter 2: Organizational Goals and Inventory Design

3. Are the goals of public agencies in creating GHG inventories accurately characterized in the *PSP*?
4. The Supplement states that existing reporting programs must be “leveraged” to ensure efficient reporting and avoid duplication of effort.” Are there real-life examples of how these different reporting requirements can be streamlined? What examples exist of voluntary or mandatory programs in which public agencies report energy consumption data? (*2-1, and 11-2*)
5. Can we include more specific examples about what mandatory GHG reporting programs public agencies have/will be facing? The current discussion does not comprehensively describe existing public sector regulations (*2-5*)



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6. The *PSP* mentions internal GHG trading programs for government activities—are there federal, state or local examples of this we can include to make this point more relevant? (2-6)
  
7. The *PSP* mentions that regulations distinguish between the transfer of “real property” and “personal property.” Can this distinction be explained further? (2-6)
  
8. The *PSP* identifies “Participation in GHG Markets” as an organizational driver for designing an inventory. Is this realistic, given the legal and logistical constraints of such participation? Or, does participation in GHG Markets (including joining CCX or purchasing offsets more generally) serve as a means of demonstrating leadership rather than making cost-effective reductions? (2-7)
  
9. The *PSP* states that “Specific legislation may be required to authorize public organizations to fully participate in a trading program.” Are there examples of such legislation that could clarify the status and relevance of this larger organizational goal of “Participating in GHG Markets”? (2-6; *see also* 8-5).
  
10. The *PSP* states that “publicly available materials” from the government relating to GHG accounting have become legally accepted sources of methods. Are there examples of this process? Would it be more accurate to acknowledge the critical role of partnerships in the development of these tools and expertise? (2-8)





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18. Under “Reporting Goals and level of Consolidation”, the *PSP* mentions military installations that host activities from multiple departments. What specific, helpful guidance can we offer within the context of this example? (3-6)
19. A government agency might manage or help coordinate a regulatory program that requires GHG reporting. If this same agency were to report its GHG emissions under this program, does a conflict of interest arise and what (if any) guidance should the *PSP* provide on this topic?

#### **Chapter 4: Setting Operational Boundaries**

20. Does the *PSP* clearly identify what public agency activities constitute direct and indirect sources?

#### **Chapter 5: Tracking emissions over time**

21. Are there specific public sector examples of outsourcing/insourcing that could illustrate these accounting concepts more effectively than an explanatory description? (5-9 and 5-10)

#### **Chapter 6: Identifying and Calculating GHG emissions**

22. Does the technical explanation of the Emissions Inventory Tool offer useful insight for a variety of public agencies? (6-8,9)
23. Are there any major sources of GHGs that are not reflected in Tables 6-1 or 6-2? (6-3 and 6-7)
24. When the emissions from multiple agencies are consolidated within a single GHG inventory, caution is required to ensure that the emissions reported under one scope (e.g.,



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scope 2/3) by one agency are not also reported under a different scope (e.g., scope 1) by another agency. Under what circumstances might such double counting arise and what guidance can be provided to guard against the possibility of double counting? (6-11)

### **Chapter 8: Accounting for Organizational GHG Reductions**

25. Are there specific examples of public agencies creating, or purchasing offsets? (Green power purchasing, CCX, or other purchased offsets?) Does the prescriptive legislative discussion offer a useful insight for public agencies? (8-6)

### **Chapter 9: Reporting GHG emissions**

26. Does the reporting guidance in this chapter allow public agencies to meet their goals for inventory development? If not, what other information would be useful to report?
27. Under “Double Counting” the PSP mentions the potential for the double counting of GHG emissions when reporting overlap exists across multiple agencies. Is there a public sector example that would illustrate how to resolve this issue (9-6)

### **Appendix E: Categorizing GHG Emissions Associated with Leased Assets**

28. What is an example of when a public agency might not have operational control over a leased asset which is held under an operating lease? (Appendix E-3-4)

### **GHG Impact of Policy Decisions**

29. Has your organization needed to account for the GHG-impact of public policy decisions it makes? If so, how has your organization treated this type of analysis in its GHG inventories?

Please provide any other comments/thoughts that you had no chance to mention in responding to the above questions.