

# Greenhouse Gas Protocol

## Explanatory Memo

### Request for Information

### Actions and Market Instruments Phase 1 Progress Update White Paper

March 2026

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## 1 Letter from the Chair of the Independent Standards Board

Dear Stakeholder,

I am delighted to welcome you to the first request for information on the work of the Actions and Market Instruments (AMI) workstream regarding the Phase 1 Progress Update White Paper.

It is the result of a thoughtful, diligent and collaborative process involving the AMI Technical Working Group (comprising a range of experts with diverse perspectives and experience) as well as continuous engagement with the Independent Standards Board (ISB) in its role as independent arbiter on the GHG Protocol standards work.

A request for information is a critical tool in shaping and strengthening standards, and in my role as Chair of the ISB, I would like to thank you for your engagement and participation. I very much look forward to receiving your input, enabling us to progress towards the future Actions and Market Instruments Standard as part of the GHG Protocol corporate suite of standards.

With warm wishes,



Alexander Bassen  
Chair, Independent Standards Board



## 2 Background, objectives and scope

The Request for Information (RFI) is an opportunity for stakeholders to provide feedback on the development of the Actions and Market Instruments Standard. It is one step of a broader process which is designed to support the development of robust, credible and trustworthy standards, leveraging the insights and expertise of stakeholders with a multitude of perspectives. GHG Protocol's Secretariat and Independent Standards Board (ISB) decided to launch a document for feedback to inform stakeholders about progress made so far and seek input from stakeholders on the fundamental concepts at this stage. Please note that this is not yet a formal public consultation under section 4.4 of the GHG Protocol [Standard Development and Revision Procedure](#), since the AMI Phase 1 Progress Update White Paper is not yet a draft standard with detailed requirements. Instead, it will follow the rules of a Special Comment Period. A formal public consultation on a draft standard is planned for Q3 2027.

The present Request for Information period focuses on the AMI Phase 1 Progress Update White Paper that addresses a multi-statement reporting structure and its proposed new elements beyond the Physical GHG Inventory:

- Statement 1: Physical GHG inventory (existing, no change)
- Statement 2: Market-based GHG inventory
- Statement 3: GHG impact statement
- Statement 4: Non-GHG indicators

To access the survey link and other request materials, [please see this page](#).

### Outline of this document

This document outlines the topics for the AMI RFI, providing the list of all questions to stakeholders plus a short background on the respective topics for which GHG Protocol is seeking feedback. A brief overview of the further development process toward an AMI standard is provided below. Furthermore, the appendix of this document contains a number of illustrative examples which are intended to increase the understanding of the proposed multi statement reporting concept by presenting the basics in a simplified way.

For comprehensive information on the proposed concepts, please read the full AMI Phase 1 Progress Update White Paper.

### Participation and next steps

Stakeholders are encouraged to review the AMI Phase 1 Progress Update White Paper and the Request for Information questions carefully and **submit their feedback via the online survey form** on the [GHG Protocol website](#). The form will be open for submissions for a **60-day period held between March 31 and May 31, 2026**. Please submit all feedback via the online survey form only. Feedback shared with GHG Protocol via other channels or after May 31<sup>st</sup> 2026 may not be considered as a part of the public consultation process.

Following this Request for Information period in Q2 2026, the GHG Protocol Secretariat will prepare a public summary of feedback, highlighting key themes and proposed areas for amendment. In H2 2026, the Secretariat will work with the AMI TWG to incorporate stakeholder feedback towards a draft standard. In H1 2027, the draft standard will be submitted to the ISB for approval and revised if needed, for a formal public consultation currently planned for Q3 of 2027.

Following the formal public consultation on the draft standard and analysis of stakeholder feedback, in the beginning of 2028 the AMI Secretariat will work with the ISB and AMI TWG on revisions. Once approved by the ISB, the GHG Protocol Steering Committee will be asked to ratify the AMI Standard to ensure due process has been followed. The GHG Protocol anticipates the revised standard to be published by the end of 2028.

Please note that the above timeline is based on the latest approved Standard Development Plan (SDP). The GHG Protocol is currently revising the workplans for its corporate standards suite alongside its partner [ISO](#) to support delivery of co-branded standards. These plans will be available on the GHG Protocol webpage in due course once agreed upon by ISO and GHG Protocol's governance bodies. GHG Protocol remains committed to ensuring a transparent and collaborative standard development process, which provides stakeholders with

visibility on the expected direction of updates as early as possible. For further updates on this topic and beyond, please [subscribe](#) to GHG Protocol's email distribution list.

### Transparency objective

All feedback received in response to the Request for Information shall be made publicly available on the GHG Protocol website and shall, at minimum, identify the stakeholder type, sector, and region of the respondent. By participating in this consultation, you are agreeing to the terms in the Disclaimer and Notice of Rights for Voluntary Feedback Submission presented in the online survey form. This means that all feedback will be made publicly available, unless otherwise specified.

**Anonymity:** Transparency, accountability, and representation from key stakeholder groups are paramount to our standard development process and the future uptake of final standards. As such, the default is for all published feedback to be fully attributed to the respondent. In the exceptional circumstance that full attribution prohibits your ability to participate in the consultation, respondents may request that their name, organizational affiliation, and jurisdiction be redacted from the publicly available database of feedback. To request this anonymity, select the appropriate option in the demographics section at the start of the survey. If availing yourself of this option, it is the responsibility of the respondent to ensure that feedback does not contain any identifiable information. GHG Protocol will not redact or modify feedback outside of specifically identified fields when publishing feedback.

**Confidentiality:** In exceptional circumstances where good cause exists, a respondent may request that highly sensitive or confidential information not be made publicly available. This narrow exemption will typically only be granted for provision of commercially sensitive data or pre-publication research findings *in support of or as a supplement to feedback otherwise subject to public disclosure*. Requests for confidentiality are subject to review and not guaranteed. Therefore, all requests must be submitted via this [form](#) and approved in writing *prior* to submission of the affected feedback. Submission of sensitive or confidential information prior to receiving approval and instruction of how to submit the affected feedback may result in its publication.

To ensure sufficient time for review and adjudication of requests for confidentiality, potential respondents must submit their request prior to April 30<sup>th</sup>, 2026. Requests after this date may be rejected. While GHG Protocol will endeavour to respond to requests as quickly as possible, response time is subject to the volume of requests. All feedback subject to disclosure must be submitted prior to the consultation deadline.

For additional insights on participation in the consultation, [please see here](#).

## 3 Actions and Market Instruments Phase 1 Progress Update White Paper

### 3.1 Multi-statement reporting structure

#### Description and rationale

Stakeholder feedback has consistently highlighted the need and value of reporting the GHG impacts of actions that are not reflected in the reporting company's physical GHG inventory. The AMI Standard/Guidance intends to fundamentally improve and expand on the categories that are currently to be "reported separately" according to the *Corporate Standard*.

Through the AMI Standard/Guidance, GHG Protocol will develop a more comprehensive and transparent corporate GHG accounting and reporting structure, with disaggregated reporting of physical GHG inventory emissions and standardized new reporting element(s) for the impacts of actions and market instruments. Clear guidance on how to account for actions and market instruments in GHG reports across sectors is expected to unlock investments in decarbonization while strengthening the integrity of GHG accounting and reporting. It will also provide meaningful information to various stakeholders and allow for integration with other voluntary and regulatory GHG reporting and target-setting programs.

#### Questions

**Note:** Question numbering begins at 16 to maintain consistency with the online survey. Questions 1–15 appear in the survey as the acknowledgment and demographics section.

16. To what extent do you support or oppose the introduction of a new “multi-statement GHG reporting structure” for GHG reports?
17. What benefits or challenges do you think that a multi-statement reporting structure could result in?
18. What changes or improvements would you recommend to increase your level of support for a multi-statement GHG reporting structure to inform Phase 2 of the Actions and Market Instruments standard development work?
19. Would you like to provide additional feedback on specific elements of the multi-statement GHG reporting structure by answering additional survey questions? Please note that if you select “no” the survey will end.

## 3.2 Purpose, goals and objectives

### Description and rationale

The purpose of the GHG Protocol AMI Standard/Guidance is to provide a cross-sector standard that enables companies to account for and report on decarbonization actions and market instruments to incentivize impactful investments, while strengthening the integrity and credibility of corporate climate action.

The goals and objectives are to address the appropriate role of actions and market instruments within corporate GHG accounting and reporting, to provide a comprehensive and transparent multi-statement accounting and reporting structure, and to enable target-setting programs to make policy decisions on how various types of actions and market instruments could be recognized under corporate mitigation targets.

### Questions

20. To what extent do you agree with the “Purpose, goals and objectives” (outlined in Section 4 of the White paper)?
21. Please explain the rationale behind your previous response and add what changes or improvements you would recommend for “Purpose, goals and objectives” (Section 4 of the White paper)

## 3.3 Statement 2: Market-based GHG inventory

### Description and rationale

The market-based GHG inventory of emissions (and removals, if applicable) is complementary to the physical inventory. It allocates emissions associated with the reporting entity’s activities from a common activity pool, based on qualified contractual arrangements for the purchase of goods and services (across scopes). It allows chain of custody models that establish contractual traceability from suppliers to the reporting company.

By maintaining a clear separation from the physical GHG inventory, the market-based GHG inventory ensures that claims about procurement and market choices are transparent. It also maintains the integrity of the company’s physical GHG inventory.

### Questions

22. To what extent do you think the Market-based GHG inventory statement should be included within a multi-statement GHG reporting structure?
23. Please explain the rationale behind your previous response and provide any additional comments on the Market-based GHG inventory statement that should inform Phase 2 of the Actions and Market Instruments standard development work.

## 3.4 Statement 3: GHG impact statement

### Description and rationale

The GHG impact statement provides a dedicated, structured statement for reporting on the impacts of actions taken by the reporting entity inside and outside its value chain (e.g., emissions avoided, reduced, or removed). It applies to actions such as projects, interventions, investments, production/sale of products, and purchase/consumption of products. This statement uses consequential accounting methods that aim to quantify the global change in GHGs in the atmosphere resulting from a given action.

The GHG impact statement does not provide a comprehensive assessment of a corporate footprint, but instead allows reporters to report the impact of activities that are quantified using consequential methods and therefore not reflected in the physical GHG inventory.

By maintaining a clear separation from Statement 1 (physical GHG inventory) and Statement 2 (market-based GHG inventory), this statement would ensure that claims about mitigation impacts, avoided emissions, credits, and other impacts based on consequential accounting are transparent and separately reported from statements using attributional accounting methods.

### Questions

24. To what extent do you think the GHG impact statement should be included within a multi-statement GHG reporting structure?
25. To what extent do you agree with the proposed sub-categories for the GHG impact statement?
26. Should any of the GHG impact statement sub-categories be merged for simplification and greater clarity?
27. To what extent do you agree or disagree that consequential reporting approaches within the GHG impact statement should reflect both positive and negative impacts of actions?
28. How should GHG impacts of sold products (e.g. avoided emissions) be treated in the GHG impact statement?
29. Please explain the rationale behind your responses in this section and provide any additional comments on the GHG impacts statement that should inform Phase 2 of the Actions and Market Instruments standard development work.

## 3.5 Statement 4: Non-GHG indicators

### Description and rationale

This statement provides a standardized reporting structure for various metrics and indicators not expressed in CO<sub>2</sub> equivalent (CO<sub>2</sub>e) but that might influence organizations' decarbonization actions and other decisions. Examples may include: financing contributions to mitigation projects; financial taxonomies; percentage of procurement or products sold that meet defined criteria; intensity metrics; or other key performance indicators.

### Questions

30. To what extent do you think the Non-GHG indicators statement should be included within a multi-statement reporting structure?
31. What level of detail should the AMI Standard provide for Non-GHG Indicators?
32. Please explain the rationale behind your responses in this section and provide any additional comments on the Non-GHG indicators statement that should inform Phase 2 of the Actions and Market Instruments standard development work.

## 3.6 Concluding questions

The RFI provides stakeholders the opportunity in the final section to provide additional feedback that was not covered in previous sections and the option to sign up for pilot testing opportunities.

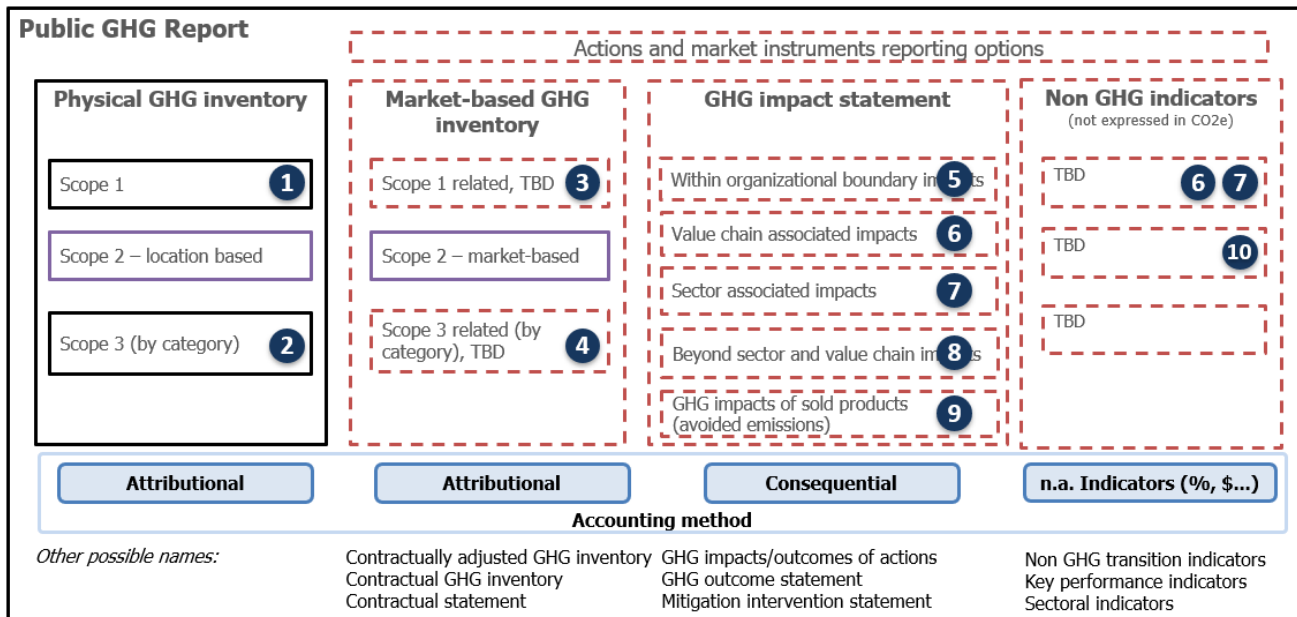
### Questions

33. If you have any other comments and remarks about the White Paper that should inform Phase 2 of the Actions and Market Instruments standard development work, including specific examples or case studies that you believe should be explored, please provide them here
34. What other important questions should the standard answer in Phase 2 that are not already included in Annex A?
35. I would like to sign up to stay informed about any potential pilot testing opportunities in the future.

## Appendix – Illustrative examples

These examples are intended to increase the understanding of the proposed multi-statement GHG reporting structure by presenting the basic concepts in a simplified way. They are illustrative and schematic. For some instruments, depending on specific circumstances, a different accounting and reporting approach may apply. Furthermore, the simplified assumption is made that all applicable quality criteria (including additionality) that are still to be defined, would be met.

The reporting company in this example is a machinery producing company located in Europe with an ambitious decarbonization plan.



Actions implemented (Numbers refer to figure above with draft statements)

- The company changed fuel supply for on-site heat generation from oil to natural gas (lowering GHG intensity of fuel used).  
→ This is accounted for in the physical GHG inventory, Scope 1 emissions (no change to current reporting approaches)
- The company buys steel from a direct (tier 1), physically traceable supplier (steel produced in a new plant of this supplier with the Direct Reduction Iron (DRI) process, having significantly lower emissions per ton of steel).  
→ This is accounted for in the physical GHG inventory, Scope 3, category 1 (Purchased goods and services), based on the respective emission factors (EF per ton of steel) and the activity level (tons of steel purchased). The material is physically traceable. (No change to current reporting approaches.)
- For on-site heat generation at one site, it now procures biomethane. This is supplied via the gas grid where it is mixed with natural gas. The supplier provides a contractual agreement that allocates 100% biomethane to the machine building company and provides an LCA and emission factors for the gas coming from residual waste.  
→ This would be accounted for in the newly proposed market-based GHG inventory under Scope 1 using the supplier-associated EF.  
→ The grid-associated EF would continue to be used in the physical GHG inventory.
- For inbound logistics (container shipping from China) it contracts an Eco Delivery where the logistics company uses e-/or bio-methanol in their vessels, providing a chain of custody with mass balance approach, allocating the fuel independent of the trade lane.

- This would be accounted for in the newly proposed market-based GHG inventory under Scope 3, category 4 (Upstream transportation and distribution).
- The reporting company would continue to use the previously identified emission factor associated with activity within the physical GHG inventory.
- 5. At another site, the company installs a Combined Heat and Power (CHP) plant which not only supplies the site but also provides power and heat to a local community.
  - This project would be accounted for in the newly proposed GHG impact statement, “within organizational boundaries” category and also has implication for Scope 1 reporting in the physical GHG inventory.
- 6. At a supplier in India, the company fully finances a methane recovery from landfill project, where the supplier uses the methane for onsite power generation.
  - The GHG reduction (avoiding methane leakage) of this project would be accounted for in the newly proposed GHG impact statement, “value chain associated impacts” category, based on the consequential accounting method. Furthermore, the investment volume could be reported in the newly proposed Non-GHG indicators statement.
- 7. It furthermore invests in a wind farm in a country where it does not have own operations and therefore does not purchase or consume electricity.
  - The impact on emission reductions would be accounted for within the newly proposed GHG impact statement, using consequential accounting approaches (“sector associated impacts” category; details of categories and method are TBD). Furthermore, the investment volume could be reported in the newly proposed Non-GHG indicators statement.
- 8. To offset GHG emissions from customer events held, it buys 5000 carbon credits from a (e.g. Verified Carbon Standard or Gold Standard) certified project (cook stoves in Ethiopia)
  - This would be accounted for in the newly proposed GHG impact statement, “beyond value chain and sector (global) impacts” category
- 9. The company produces a technology that enables its customers to significantly reduce their emissions from manufacturing.
  - This would be accounted for in the newly proposed GHG impact statement, “GHG impacts of sold products” category
- 10. The company tracks the % of their product portfolio sold to customers that contains low carbon steel only.
  - The respective % year-on-year would be accounted for in the Non-GHG indicators statement. .