



## ICCP POSITIONS ON KEY GHG REPORTING ISSUES

<b>ISSUE</b>	<b>ICCP POSITION</b>
Voluntary versus Mandatory	<p>Not opposed to (but not actively supporting) a mandatory program</p> <p>Must contain certain elements: legal recognition of early reductions, recognition for reductions achieved by products</p> <p>If voluntary, significant incentives will be needed</p>
Jurisdiction (EPA, DOE, DOC)	No official ICCP position
Goals of reporting	<p>Minimizing costs, transparency, accuracy, validity</p> <p>Include legal recognition in "Purpose"</p>
Process for establishing rules	ICCP supports a rulemaking type of process that would include public comment, opposes an interagency decision without public comment
Timeline for implementation	Phased in approach OK as long as broad inclusion is codified at outset (timing, size, sector)
Threshold for reporting	<p>Threshold is important so as not to include small businesses, 1,000 metric tons may be too low</p> <p>For political reasons, threshold should be presented as an exemption for those below a certain level</p>
What is reported	Support inclusion of direct emissions, carbon storage activities, stationary and mobile sources under entity's

What is reported (cont)	control, avoidance of emissions, energy efficiency projects, fuel switching, project reductions, transfers to other entities, reductions achieved in and out of the US, product related reductions Do not support attempting to quantify "outsourcing"
Who reports	Entity-wide reporting at the facility level is OK, but facility level reporting must be CBI
Legal recognition for reductions achieved and/or baseline protection	Mandatory or voluntary reporting should be based on providing legal recognition of documented reductions achieved after 1990
Inclusion/exemption of federal facilities in reporting requirements	Federal and State facilities should be treated the same as other entities
Funding for program	Need to specify an appropriate amount of funding to carry out the program
Inclusion of reductions achieved outside the US	Should explicitly be allowed to report on a voluntary basis
Reporting of transfers	Should explicitly be allowed to report on a voluntary basis
Integration with other databases, registries or environmental reporting requirements	Need to integrate reporting requirements at state, local, regional and international level as well as existing environmental reporting requirements
Role of Congress	normal oversight OK
Use of electronic reporting	Needs to require electronic reporting
Verification	Self-certification to a standard protocol with optional third-party verification
Enforcement and penalties	No new regulatory authority, no harsh penalties
Use of best practices for protocol	Existing protocols should be used when appropriate, such as WRI/WBCSD, WSI
Registry conflict of interest	Need to ensure those managing registry have no conflict of interest