

05/11/2025



To:

Pankaj Bhatia, Co-Director, Greenhouse Gas Protocol (WRI)
Maia Kutner, Co-Director, Greenhouse Gas Protocol (WBCSD)

Subject: The Greenhouse Gas Protocol must urgently issue an interim statement reassuring markets about ultimate recognition of robust market-based instruments in GHG inventories

Dear Ms. Kutner and Mr. Bhatia,

We write to you as corporate and end-consumers of renewable gases¹, committed to the decarbonisation of our operations in alignment with urgent and imminent global climate targets. This letter follows up on the most recent letter sent to you by more than 200 companies and associations active in the renewable gases value chain².

The current absence of clear, interim guidance for renewable gas reporting under Scope 1 has left a critical gap for companies like ours — those that rely on renewable gases, supported by credible certification schemes, as a decarbonization pathway where electrification is not feasible. This uncertainty severely undermines our ability to meet GHG reduction targets, and, in turn, is stalling investment in renewable gas production, infrastructure, and procurement.

We understand that since February 2023 recognition of market-based instruments is under discussion within Greenhouse Gas Protocol workstreams, currently in the ongoing Actions and Market Instruments (AMI) Technical Working Group. We are **increasingly concerned with signs in the AMI work programme** that could delay the revision process beyond the projected and already late deadline of 2028 for the end of the process.

In this context, we feel compelled to reiterate and escalate **our call for action**: the Greenhouse Gas Protocol should take bold action to ensure that the **workstream on the Market Instrument Guidance** not only stays on track, but it is **actually fast-tracked**. **Additionally, we urge the Greenhouse Gas Protocol to issue an interim statement providing certainty that the revision process will eventually recognise robust market-based instruments in GHG inventories**. This will offer clarity and confidence for stakeholders as final standards are being developed.

These two actions could be done in line with the GHG Protocol's internal procedures, which provide the Secretariat with the necessary flexibility to submit a proposal for an interim statement to the Steering Committee³. *During Mr. Bhatia's meeting with the leadership of European Biogas Association and RNG Coalition at the New York Climate Week in 2023, it was agreed that there is urgency "to define a reliable and solid methodology for biomethane certificates, as more and more companies using the GHG Protocol framework look to biomethane to decarbonize their activities"*⁴. *It was also agreed that the organizations would host a joint*

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

² [Let Green Gas Count](#).

³ As per Sections 2.2.1.ii of the Governance Overview; 3.2.1 and 5.3.1 of the SC Terms of Reference.

⁴ [European Biogas Association to cooperate with global GHG Protocol in developing rules for the reporting of biomethane purchase \(25 September 2023\)](#).

workshop in 2024. To date, no additional clarity has been provided from GHG Protocol on this matter, and planning for a workshop was cancelled by the World Resources Institute.

We would be open to contributing to this process and welcome opportunities to engage in your work. A timely signal from the GHG Protocol would send a powerful message to the market, and help ensure that renewable gases continue to play their essential role in delivering on global climate goals.

Respectfully,

*Yannael BILLARD, Acting Director, Airport Planning, Sustainable Development and Public Affairs Division, **ADP Group***

*James Streater, General Manager and Head of Sustainable Development, **Arcelor Mittal***

*Christophe Pouille, CEO, **Balsan***

*Raffaele Ruella, CFO and Head of Corporate Services and Managing Director, **Beltrame Group***

*Thierry Quaranta, Directeur de la Transformation Durable, **Carrefour Supply Chain***

*Maiwenn Le Pierrès-Bullier, Director General, **CERAFEL***

*Elena Breda, Chief Technology and Sustainability Officer, **Electrolux Group***

*Florence Colombo-Fouquet, Chief Sustainability Officer, **Engie***

*Sonia Thimmiah, Senior Director, Global Sustainability, **Heineken***

*Rémi Cristoforetti, CEO, **Le Gouessant***

*Koki Hayakawa, Senior Managing Director and Secretary General, **Japan Gas Association***

*Norbert Audéoud, Global Head of Sustainability, Operational Excellence & Safety, **Knauf***

*Sylvestre Bertucelli, Directeur, **Légumes de France***

*Régis Chevallier, President, **Les Maraichers Nantais***

*Christine Montenegro McGrath, SVP, Chief Impact & Sustainability Officer, **Mondelēz International***

*Sandrine Meunier, Director General, **Natran***

*Benjamin Ware, Global Head of Climate, **Nestlé S.A.***

*Alexander Godow, COO, **NordZucker***

*Anna Chittum, President, **NW Natural Renewables***

*Tadashi Yamamoto, Deputy Senior General Manager, Energy Resources and Carbon Neutral Business Department, **Osaka Gas Co., Ltd.***

*Jose-Ramon Fernandez, European Public Affairs Director, **Pernod Ricard***

*Xavier Galliot, Chief Sustainability and Stakeholder Engagement Officer, **Roquette***

*Vincent Ferry, Managing Director, **Save Energies***

*Pierre-Yves Jestin, Président, **Coopérative Maraichère de l'Ouest - SAVÉOL***

*Fredrik Nilzén, Head of Corporate Sustainability, **Scania CV AB***

*Carsten Franzke, Managing Director, COO, **SKWP***

*Albert Kassies, Director of New Energy, **Tata Steel Nederland***

*Takeshi Kanamaru, Executive Officer / General Manager of Corporate Planning Department, **TOHO GAS CO., LTD.***

*Yuji Kobayashi, Senior General Manager, e-Methane Business Development Department, Green Transformation Company, **Tokyo Gas Co., Ltd.***

*Thomas Riou, CEO, **Verescence***

*Jan Hjelmgren, Senior Vice President Product Management, **Volvo Trucks***

*Biagio Costantini, CEO, **Zignago Vetro***



Yannaël BILLARD
Acting Director, Airport Planning, Sustainable
Development and Public Affairs Division



James Streater
General Manager and Head of Sustainable
Development



Christophe Pouille
CEO

Signé par :

Christophe POUILLE

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Christophe Pouille
CEO

BALSAN
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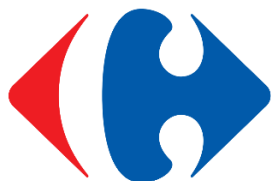
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Raffaele Ruella, CFO and Head of Corporate
Services and Managing Director

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Thierry Quaranta
Directeur de la Transformation Durable



Respectfully,



Maïwenn Le Pierrès-Bullier
Director General



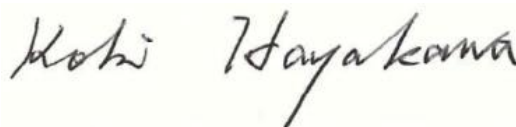
Elena Breda
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Signé par Sandrine Meunier
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Directrice Générale

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Sandrine Meunier
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Benjamin Ware
Global Head of Climate



Anna Chittum
President



NW Natural
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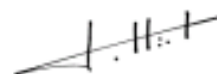


Tadashi Yamamoto

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Deputy Senior General Manager, Energy Resources
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Jose-Ramon Fernandez
European Public Affairs Director



Xavier Galliot
Chief Sustainability and Stakeholder Engagement
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Albert Kassie
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TATA STEEL



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Executive Officer / General Manager of Corporate
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TOHO GAS

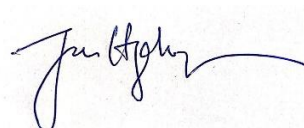


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