



# ECOLOGIA

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Mr. Kevin Boehmer  
Secretary, TC 207 WG5 (Climate Change)  
Canadian Standards Association  
5060 Spectrum Way  
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RE: WG5 Process Issues

Dear Kevin:

Thank you for your very clear recent memos outlining the new timeline proposed at the facilitators' meeting in Vancouver. We also appreciate your request that WG5 members contact you with questions or concerns about the changes, and we thought that ECOLOGIA should take you up on that invitation. At ECOLOGIA, we have grown concerned that WG5's recent pace and procedural decisions may put at risk the integrity of the group's decision-making process, and by extension, the quality of our final product.

In Berlin you and Dr. Chan wisely outlined a set of four principles to guide the work of WG5: technical rigor, speed to market, extensive participation, and policy/regime neutrality. In Langkawi, compatibility with the WRI/WBCSD GHG Protocol was added as a fifth. Since then, however, the Working Group has never examined the extent to which these principles have been followed or how to adhere more closely to them. It seems wise to revisit them before the standard moves to its CD stage. In particular, we need to acknowledge openly that there is a certain tension among the first four principles, and that one of them, speed to market, seems to have gained precedence for reasons that are not completely clear.

While your post-Vancouver memos describe in detail the new schedule for progress on Part 2, they do not include an explanation for why the timetable was revised. As we understand it, the slower Part 2 schedule was established in

Bali largely in order that our technically more challenging project work (especially with regard to removals) could benefit from the outcomes of COP 9 in December. This still seems logical to us, and we believe the WG should hear an explanation of what considerations in Vancouver superseded those discussed in Bali and how the issues of removals and COP 9 can be addressed on the new timeline.

More importantly, the change in the schedule exemplifies a trend since Bali toward closed and last-minute decision-making among the WG5 leadership group. The US experts have outlined many examples of this in N108. As you know, we at ECOLOGIA have not often been inclined to agree with our US colleagues, but in this case we believe they have identified a number of valid concerns, especially with regard to the immediate post-Bali editing process. When experts volunteered to join the editing group in Bali, many assumed that each of its three sub-parts would continue along the trajectories established during the Bali break-out sessions, and that there would be opportunities to review and comment on drafts similar to the editing process between Langkawi and Bali. With the exception of Part 2, this largely proved not to be the case, and there was little or no communication with editing group members until very close to the pre-Vancouver drafting deadline.

While we admire the time, hard work, and good will that you and the facilitators have brought to your post-Bali work, extensive participation was outlined as a guiding principle in this work for very important reasons. Without participation from experts with a broad range of knowledge and perspectives, the document risks losing its technical rigour, and the process risks losing the trust of its participants, who must essentially serve as 'ambassadors' for the standard in their national mirror committees and other constituencies. We also risk a breakdown in the collegiality of the working group, where the handful of people doing the work may resent having their work criticized by those who have not contributed, while those people in turn resent what they perceive as barriers to their involvement. Moving forward, ECOLOGIA recommends the following specific actions for WG5:

**1. Consider a delay in the release of CD1.** Given the very substantial and largely unexpected changes in Part 1 between Bali and Vancouver, the comments flying among the Part 2 editing group last week, and the likelihood that few people found time during August to digest the largely new Part 3, it seems quite possible that you will receive a fairly large number of substantive new comments from a range of WG5 members on the upcoming draft CD1. If this proves to be the case, the working group should take an extra month for a second draft CD before the formal release of a CD to TC207, so that experts may see how their comments are resolved before bringing the document to their mirror committees. Such a delay would imply the need for a matching delay in the March WG5 meeting, but it could be time very well spent.

**2. Better manage process and communications, at both the WG and sub-WG levels.** Proposals for process decisions should be fully substantiated and taken in timeframes that allow for members to provide input. In cases where decision-making is delegated to sub-groups, those groups need clear, agreed-upon memberships, roles, processes, timelines and communications channels. Our editing sub-groups achieved reasonably good process between Langkawi and Bali, but after Bali it became largely unclear who was to do what and when. No doubt summer holidays played a role in the break-down in process, and such seasonal cycles need to be better taken into account in planning future timelines.

**3. Revisit the guiding principles for WG5's work.** WG5 would benefit from more frequent discussion of its guiding principles and periodic evaluation of the extent to which we adhere to them. As an NGO particularly interested in decision-making processes, ECOLOGIA is drafting an evaluation of WG5's process to date that will be posted on our website by the end of September. We welcome feedback on that evaluation, as well as thoughts from WG5 members about why speed to market has been emphasized, what level of speed is warranted, and what trade-offs are being made with other important values.

We write this because we believe that the process by which WG5 makes decisions deserves at least as much attention as the substance of those decisions. There has been a learning curve on this for all of us, and we hope that the ideas expressed here can contribute toward maintaining a fair and effective process for WG5's work. We welcome feedback or thoughts on these issues from you and other WG5 members.

Best,

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Program Director

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