

ISO standard on Greenhouse Gas accounting: the process of standards development

Report by ECOLOGIA (July 2003)

Background

In June 2002, the International Organization for Standardization (ISO) began creating a new international standard for the quantification, reporting and verification of greenhouse gas (GHG) emissions, usually called 'greenhouse gas accounting'. This report seeks to inform NGOs and other parties interested in climate change about process, procedures and participation in the first year of the standard's development (June 2002-July 2003). More recent updates on the standard's development process may be found at [specific web address here].

This report has been prepared by **ECOLOGIA**, an international NGO that participates in ISO decision-making as an 'A-liaison' organization, and is a member of ISO Technical Committee 207's '**Working Group 5**' (**WG5**), which is responsible for the development of the GHG standard. ECOLOGIA seeks to work with NGOs to promote a GHG accounting standard that has **environmental integrity**, is **transparent**, based on **best practice** -- especially the WRI/WBCSD *GHG Protocol* -- and supports, rather than undermines, national and international **initiatives for combating climate change**.

This report is guided by the draft [NGO Position Paper](#) on the ISO GHG standard¹. It reflects the priorities identified by ECOLOGIA and its NGO allies for negotiation within Working Group 5. Any reference in this report to positions of "countries" should be understood within the context of ISO procedural customs: WG5 officially is comprised of experts who are expected to speak their individual opinions, but in fact they are nominated by their national standards bodies and usually form positions as national expert groups.

Summary

Key process developments in year 1 of the GHG standard's development:

- ✧ Participation has broadened over the year to include industry, government, consultant, NGO and standards-making representatives. The depth of government involvement, in particular, as well as the one active NGO, represent an improvement from ISO's typical industry- and consultant-dominated decision-making. (+/-)
- ✧ Non-OECD countries have been less active and less well-represented than OECD countries. Consistent non-OECD involvement has been limited to Malaysia, South Africa, Indonesia, Brazil, and Argentina. However, this level of participation represents an

¹ Available from ECOLOGIA's Web site www.ecologia.org.

improvement compared to many ISO deliberations. Other developing countries have participated during TC207 plenaries but have not attended independent WG meetings. (+)

- ✧ A critical source of global expertise on greenhouse gas accounting – the Greenhouse Gas Protocol convened by the World Resources Initiative and World Business Council on Sustainable Development – has not been directly represented in WG5 deliberations. However, GHG Protocol personnel have communicated informally with the Secretary and other members of the WG, and have submitted influential comments on one draft of the entity standard (Part 1). The GHG Protocol have also invited WG5 members to road test their project module. (+/-)
- ✧ The UNFCCC has not been directly represented in WG5, and there have been disagreements about how best to maintain regime neutrality with regard to the Kyoto Protocol. (-)
- ✧ WG5 established at its second meeting four guiding principles for its work: broad participation, technical rigor, regime neutrality, and speed to market. A fifth – compatibility with the GHG Protocol – was added at its second meeting. Of these, only one (regime neutrality) has been discussed in detail and clearly defined. (-)
- ✧ WG5 has been working on a very tight timeline, and remains substantially on track to reach its goal of releasing the standard in early 2005. A number of experts complain informally of not having sufficient time to review drafts thoroughly, and one delegation (USA) has written formal comments to ask for a slower process (not granted). At the opposite end of the spectrum, Japan sought unsuccessfully to speed movement on the project standard (Part 2). (-)
- ✧ WG5 has largely had clear procedures and timelines, despite a few instances of disagreement about procedures for resolution of expert comments. (+)
- ✧ WG5’s outreach to developing countries and other unrepresented stakeholders has been limited compared to what was originally discussed. No funding has been found specifically for participation or capacity-building. The Ad Hoc Group on Cross-cutting Issues created at the first WG5 meeting failed to reach agreement on strategies to broaden participation beyond the creation of an informational flyer. However, successful capacity-building sessions were held in conjunction with WG5 meetings in Malaysia and Indonesia. (-)

Process evaluation for Year 1²:

Participation of developing countries	-/+
Multi-stakeholder participation	+/-
Representation of diverse expertise	+/-
Dialogue with other standard-setters	-/+

²Symbols reflect ECOLOGIA’s evaluation as follows: “+” – the principle is largely followed; “+/-” – the principle is followed but with some omissions; “-/+” – the principle is not followed, though an attempt is made; “-” – the principle is largely ignored; “?” – significant uncertainties exist

Transparency/accountability in procedures	+/-
Capacity building	-/+

Immediate goals:

Strengthen NGO involvement, engage in capacity building for developing countries, promote better dialogue with other standard-setters

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Background on the Standard's Progress

ISO Technical Committee 207 (ISO's environmental committee) formally established to develop its GHG standard in June 2002. WG 5 is working on a three-year timeline and expects to publish its standard in June 2005. As of July 2003, WG 5 has met four times: in Johannesburg, South Africa (June 2002); Berlin, Germany (Nov. 2002); Langkawi, Malaysia (March 2003); and Bali, Indonesia (July 2003).

The standard has been divided into three parts: 1) entity-level quantification (also called 'organizational' or 'corporate' GHG accounting), 2) project-level quantification and 3) validation and verification. Working drafts of parts 1 and 3 were circulated for comments from WG5 experts in March 2003; a working draft of part 2 was not formalized until after the July Bali meeting.. Upcoming milestones in the development of the standard include:

Sept. 2003	Release of a Working Draft of Part 2 (project quantification) for comment from WG5 experts
Oct. 2003	Publication of a Committee Draft ³ for Parts 1 and 3, on which TC 207 member bodies not in WG5 will make their first formal country comments. The Committee Draft requires either consensus within the TC or 2/3 approval in a full committee vote in order to become a Draft International Standard.
Dec. 2003	Meeting of experts in Geneva to discuss the working draft of Part 2.
Mar. 2004	Next meeting of WG5 (in the UK), for discussion and incorporation of country comments on the Committee Draft.
June 2004	Approval of a Draft International Standard , which requires 2/3 approval in a full vote by all ISO member bodies (even those not represented in TC 207).
March 2005	Approval of a Final Draft International Standard , which again

³ An explanation of the stages of the ISO standards development process can be found in the "[Guide to NGO Participation in ISO TC 207](#)" available from [ECOLOGIA Website](#).

	requires 2/3 approval in a full vote by all ISO member bodies.
June 2005	Publication of International Standard ISO 14064 .

Details on the year 1 of the decision-making process

MULTINATIONAL PARTICIPATION (-/+)

ISO has member bodies from 143 different countries; 69 have representation on TC 207. Of those, 19 were represented at the Malaysia WG5 meeting, and 24 were present at the most recent meeting in Bali. In general, meeting participation is higher when held in conjunction with TC 207 plenaries (such as in Bali). To provide details on country involvement in WG5, ECOLOGIA has created a table [web link here] to track participation.

Since the mid-1990s, ISO has been working to improve developing country participation in standards-making. It has established new policies, organized capacity-building workshops, and created funding mechanisms to help improve developing country attendance at meetings. In the case of WG5, Malaysia and Canada share leadership of the WG as part of a developing/developed country ‘twinning’ policy established by ISO. In addition, holding meetings in developing countries has facilitated developing country attendance. Nevertheless, developing countries actively represented in Bali were limited to Argentina, Brazil, Indonesia, Malaysia, and South Africa.

Unfortunately, attending meetings does not ensure full participation. According to ECOLOGIA’s observations, developing countries rarely participate as fully as developed countries.

For example, out of 502 written comments provided for the May 2002 draft of the entity part of the standard, 88% (444) were provided by 8 developed countries with the remaining 12% shared by 3 developing countries and liaison organizations. Another example is that among the six facilitators of the WG5’s three subgroups in Bali, there are three British, one Canadian, one Austrian and one South African. At its first meeting, WG5 had decided to ‘twin’ the facilitation of its sub-groups with developed/developing country representatives, but the developing countries involved never named facilitators to take part, for reasons that remain unclear. For a listing of WG5 sub-groups and their leadership, please see Table 2 [web link here]. The issues of developing countries participation is closely linked to their capacities as explained below.

Table 1. Participation in WG5, broken down by country.

Table 2. WG5 subgroups and their leadership.

MULTI-STAKEHOLDER PARTICIPATION (+/-)

WG 5 has made a partially successful effort to attract representatives of different stakeholder groups. In particular, government bodies (especially from European countries) have been well represented since the Malaysia meeting. However, standardization bodies and consultants continue to play a central part in standard development. ECOLOGIA remains the only

international NGO continuously involved in the work of WG 5. Additionally, the German delegation includes a member of the Wuppertal Institute for Energy and Climate who represents both German NGOs and academia. ECOLOGIA provides a sample list of meeting attendees categorized by stakeholder group in Table 3.

In addition, WG5 established at its first meeting an ad hoc group on cross-cutting issues, which was to have addressed the questions of participation and outreach. This group (facilitated by ECOLOGIA and Germany) failed to agree upon a clear direction for its work, and was disbanded with the four other ad hoc groups at the end of year 1, greatly reducing the WG's original vision for extensive outreach and participation. ECOLOGIA's Discussion Paper [put web link here] proposing roles and activities for the ad hoc group was disputed by the German delegation and never released to the WG. Germany and ECOLOGIA did produce together an informational flyer [web link here] for outreach on behalf of WG5.

Table 3. WG5 Malaysia meeting attendance according to stakeholder group.

ECOLOGIA Discussion Paper on the Cross-Cutting Issues Ad Hoc Group.

WG 5 Outreach Flyer.

REPRESENTATION OF DIVERSE EXPERTISE (+/-)

The WG5 membership list maintained by the Canadian Standards Association lists 166 individuals. Of those, about 40 attended the Malaysia meeting, and 80 were present for the Bali meeting.

WG5 has not done a systematic assessment of whether all needed technical expertise is represented in its membership. By ECOLOGIA's informal analysis, WG 5 currently involves experts with background in standardization, corporate inventories, government regulations and international regimes, standards verification, accounting, GHG project validation, and environmental management systems. As described below, the substantial GHG accounting expertise embodied in the GHG Protocol has only been represented indirectly in the WG. A lack of technical expertise with regard to project accounting, and GHG removals, in particular, remains a significant problem, due in part to the fact that this remains an emerging scientific and technical field.

DIALOGUE WITH OTHER STANDARD-SETTERS (-/+)

So far the WG 5 has not succeeded in setting up an explicit two-way dialogue with the WRI/WBCSD GHG Protocol developers or other developers of international GHG accounting rules. Efforts to engage key initiatives have included outreach activities on the part of the WG5 secretary to a range of international agencies and organizations [Make a web link to a little window that lists them: World Resources Initiative/World Business Council on Sustainable Development GHG Protocol, United Nations Framework Convention on Climate Change Secretariat, Inter-governmental Panel on Climate Change (IPCC) National GHG Inventory Program, International Emissions Trading Association (IETA), International Accounting Forum (IAF)], only two of which (GHG Protocol and IAF) have become engaged (largely indirectly) with WG5. However, there is some overlap in participation between WG5, the GHG Protocol and international GHG accounting initiatives.

TRANSPARENCY/ACCOUNTABILITY (+/-)

So far WG5 has worked in a transparent and accountable manner in accordance with ISO Directives and TC 207 rules. At the same time, the pressure to deliver the standard on time has resulted in formal and informal complaints that not enough time is given to elaborate comments on the national level. In addition, the procedural flexibility granted to working groups under ISO Directives has on occasion created some confusion about process. For example, there have been a couple of cases where delegations prepared comments on draft documents in the expectation that they would be reviewed and resolved one-by-one during WG5 meetings. Directives leave

CAPACITY BUILDING (-/+)

The WG 5 conducted capacity building workshops at both of its last meetings: in Malaysia and Indonesia. These were well attended by local stakeholders.

However, capacity of “newcomers”, especially from developing countries to participate in WG 5 deliberations remains very limited. Some of them complain that despite their interest they cannot quickly make sense of the issues that are being debated and consequently cannot contribute. More effective capacity-building is needed, and will require dedicated time and funding.

More information on the ISO TC 207 WG5’s process and ECOLOGIA’s efforts to improve it can be found at www.ecologia.org/ems/ghg/.

Annex

Table 1. Participation of Member Bodies in WG 5 Decision Making

TC 207 consists of 69 voting member bodies, which are the national standardization bodies of each member country. In addition, there are 19 observer members and 46 bodies that have liaison status to the TC (both non-voting). In June 2002, the TC approved the creation of WG5 by a vote of 31 ‘for’, 3 ‘against’, and 5 abstaining. The table below tracks the participation of the 27 member bodies and liaisons that have subsequently been active in the WG. ECOLOGIA began tracking meeting participation at the third meeting (Malaysia, March 2003). Member bodies not listed have not attended meetings or made comments.

Member Body/ Liaison	Vote to Start WG5	Written Comments 2/03	Malaysia Meeting	Written Comments 5/03	Bali Meeting⁴
Australia	Yes	Yes	3 delegates	Yes	3 delegates
Austria	Yes	Yes	2 delegates	Yes	1 delegate
Brazil	Yes	Yes	No	No	1 expert
Canada	Yes	Yes	3 delegates	Yes	2 delegates
Columbia	Yes	Yes	no	no	no
Czech Republic	Yes	Yes	1 delegate	Yes	1 expert
Denmark	Yes	Yes	2 experts	Yes	1 expert
ECOLOGIA	N/A	No	2 experts	Yes	2 experts
FEE	N/A	No	No	No	1 expert
Finland	Yes	Yes	2 experts	No	no
France	Yes	Yes	3 experts	Yes	2 experts
Germany	Yes	Yes	4 experts	Yes	7 experts
Indonesia	Yes	No	1 expert	No	3 experts

⁴ Note that participation at the Bali meeting was difficult to track precisely because a formal participants list was not issued. The meeting took place in conjunction with the TC207 plenary, and was open to experts and observers from the TCs other sub-groups. Most likely, the figures given here underestimate participation.

Ireland	Didn't vote	No	No	No	1 expert
ISO TC 146 (Air Quality) SC1/SC4	N/A	Yes	No	No	No
ISO TC 207/SC2	N/A	No	1 expert	No	1 expert
ISO Conformity Assessment Committee	N/A	Yes	1 expert	No	1 expert
Japan	No	Yes	5 experts	No	5 experts
Malaysia	Yes	Yes	3 experts	Yes	3 experts
Netherlands	Yes	Yes	No	No	1 expert
Norway	Didn't vote	Yes	2 experts	Yes	1 expert
Singapore	Yes	No	No	No	2 experts
South Africa	Yes	Yes	1 expert	No	1 expert
South Korea	Yes	No	1 expert	No	3 experts
Spain	Yes	No	1 expert	No	No
Sweden	Yes	Yes	1 expert	Yes	No
Switzerland	No	Yes	No	No	No
UK	Yes	Yes	4 experts	Yes	4 experts
USA	Yes	Yes	1 expert	Yes	3 experts

Table 2. Leadership and Structure of ISO TC 207/Working Group 5 on Climate Change

Convenor: Dr. Chan Kook Weng, Malaysian Palm Oil Board

Secretary: Mr. Kevin Boehmer, Canadian Standards Association

SUB-GROUP STRUCTURE AND LEADERSHIP, JULY 2003-PRESENT

Sub-Group	Facilitators
Entity Quantification	Nigel Carter, UK

	Brian Dawson, Australia
Project Quantification	Klaus Radunsky, Austria Steven Messner, UK
Verification and Validation	Mark Barthel, UK Christine Schuh, Canada alternate: Geoff Visser, South Africa

SUB-GROUP STRUCTURE AND LEADERSHIP, JUNE 2002-JULY 2003

<i>Sub-Group</i>	<i>Facilitators</i>
Ad Hoc Group 1: Entity	Tod Delaney (USA) Brazil
Ad Hoc Group 2: Project	Mitsutsune Yamaguchi (Japan) India (facilitator never named)
Ad Hoc Group 3: Verification	Mark Barthel (UK) Czech Republic (facilitator never named)
Ad Hoc Group 4: Cross-cutting	Aleg Cherp (ECOLOGIA) Franzjosef Schafhausen (Germany)
Ad Hoc Group 5: Facilitators Group	Kevin Boehmer, Secretary (Canada)

Table. 3. Participation in a typical WG5 meeting (Langkawi, Malaysia, March 2003)⁵

ISO Member Body	Delegates' Organizational Affiliation	ECOLOGIA Stakeholder Categorization⁶
Australia (2)	Australian Greenhouse Office	Government

⁵ Taken from the list of participants distributed at the meeting by the meeting host, Department of Standards Malaysia.

⁶ Stakeholder categorizations in this table have been made by ECOLOGIA and do not represent decisions made by ISO member bodies, delegates or their organizations. Most ISO member bodies do not formally take stakeholder categorization into account when choosing delegates.

Australia	State Forests of New South Wales	Government
Austria	Federal Environment Agency	Government
Austria	Vocstalpine/Austria	Consultant
Canada	Pricewaterhouse Coopers	Consultant
Canada	Natural Resources Canada	Government
Canada	ALCAN INC.	Industry
Czech Republic	Center for Clean Air Policy	NGO
Denmark	Danish Standards Association	National Standards Body
Denmark	Danish Environmental Protection Agency	Government
ECOLOGIA (USA)	ECOLOGIA	NGO
ECOLOGIA (Belarus)	Central European University	NGO/Academia
Finland	Pricewaterhouse Coopers	Consultant
Finland	Oy Enemi Ltd.	Consultant
France	ADEME	Government
France	HSE Management SARL	
France	EPE/FFE	
Germany	German Institute for Standardization	National Standard Body
Germany	Wuppertal Institute	NGO/Academia
Germany	Stuttgenweg 2	Industry
Germany	Fraunhofer Institute for System and Innovation Research	Government/Academia
Germany	Siemens AG, CT ES IE	Industry
Indonesia	Ministry of Environment of Indonesia	Government
ISO CASCO (South Africa)	South African Bureau of Standards	National Standards Body
ISO TC207/SC 2 (USA)	Futurepast Inc.	Consultant
ISO TC 146/SC4 (France)		
Japan	Conformity Assessment Division, Ministry for Economics, Trade and Industry	National Standards Body

Japan	Institute of Energy Economics	Government/Academia
Japan	Research Institute of Economy, Trade and Industry	Government/Academia
Japan	Keio University	Academia
Japan	National Institute for Environmental Studies	Government/Academia
Korea	Eco-Frontier Co.	Consultant
Malaysia	TBN Research Sdn Bhd	
Malaysia	Exxonmobil Exploration and Production Malaysia Inc.	Industry
Malaysia	PETRONAS	Industry
Mexico	ASSIST	Consultant
Norway (2)	DNV	Consultant
Spain	AENOR	National Standards Body
Sweden	Vattenfall AB/SwedPower	Industry
UK	LRQA Center	Consultant
UK	British Standards Institution	National Standards Body
UK	Department of Environment, Food and Rural Affairs	Government
UK	En-Venture	Consultant
UK	United Kingdom Accreditation Service	Consultant
UK	ATKINS	Industry
USA	First Environment Inc.	Consultant