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## **GHG Protocol: Actions and Market Instruments**

### **Cover Note**

#### **Objective**

1. The objective of this session is for EFRAG SRB and SR TEG:
  - a) to receive an update on the feedback received during the public consultation of the EFRAG AMI Draft Comment Letter and how it shaped the updated Comment Letter (CL); and
  - b) to discuss and approve the final CL for the submission to the Greenhouse Gas Protocol.

#### **Background**

2. On 31 March 2026, GHG Protocol (GHGP) launched a 60 days Request for Information (RFI) to address how companies should account for the real-world impacts of their climate actions, particularly those that fall outside existing (physical) scope 1, 2, and 3 emissions inventories. The RFI builds on the previously published Phase 1 White Paper which notably introduces the concept of a multi-statement reporting structure. The consultation is open for feedback until 31 May 2026.
3. EFRAG is preparing its response to the GHG Protocol RFI. The context of this work was discussed with EFRAG SR TEG on 3 and 19 March, and with EFRAG SRB on 11 March and 7 April 2026, leading to approval of Draft Comment Letter for public consultation<sup>1</sup>.
4. Feedback gathered in public consultation included engagement with 21 stakeholders and was summarised by EFRAG Secretariat in Draft Feedback Statement (EFRAG Agenda paper 02-01) and led to updated Draft Comment Letter (Agenda paper 02-03)

#### **Next steps**

5. If EFRAG SRB and SR TEG approves the CL, EFRAG Secretariat will submit it to GHG Protocol within the deadline of 31 May 2026 through an online survey and publish the approved CL on its website.

#### **Appendices**

6. In addition to this cover note, the following documents have been provided for this session:
  - a) Agenda paper 01-02 – Draft Feedback Statement
  - b) Agenda paper 01-03 – Updated Comment Letter
  - c) Agenda paper 01-04 - Updated Comment Letter – redline to consulted draft

#### **Questions for EFRAG SRB and SR TEG**

7. Does EFRAG SRB or SR TEG has any comments on the feedback received and the proposed changes to EFRAG Comment Letter?
8. Does EFRAG SRB and EFRAG SR TEG approve the Comment Letter?

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<sup>1</sup> [Share your views: EFRAG Consults on its Draft Comment Letter on the GHG Protocol's Actions and Market Instruments Phase 1 White Paper](#)