



Item 06 – GRI Topic Standard Project for Climate Change – Draft GSSB basis for conclusions for GRI 102: Climate Change and Just Transition 2025

For GSSB review

Date	20 February 2025
Meeting	19 March 2025
Project	GRI Topic Standard Project for Climate Change
Description	<p>This document summarizes the significant issues raised by respondents on the GRI Climate Change exposure draft during the public comment period from 21 November 2023 to 29 February 2024. This document outlines the draft responses from the Global Sustainability Standards Board (GSSB) to the significant issues raised based on discussions and recommendations by the Climate Change Technical Committee.</p> <p>As the GSSB Due Process Protocol outlines, this document is not subject to voting for approval, is not part of the final Standard, and is non-authoritative.</p> <p>The full set of public comments can be downloaded from the Topic Standard Project for Climate Change page on the GRI website.</p>

This document has been prepared by the GRI Standards Division and is made available to observers at meetings of the Global Sustainability Standards Board (GSSB). It does not represent an official position of the GSSB. Board positions are set out in the GRI Sustainability Reporting Standards. The GSSB is the independent standard setting body of GRI. For more information visit www.globalreporting.org.

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About this document

This document summarizes the significant issues raised by respondents regarding the [GRI Climate Change exposure draft](#) during the public comment period from 21 November 2023 to 29 February 2024.

The document includes the feedback provided by respondents through the public comment survey hosted on the [Topic Standard Project for Climate Change page](#) and the feedback submitted by email.

All individual comments received, together with an analysis of the significant issues raised, were considered by the GRI Climate Change Technical Committee. The recommendations of the technical committee (TC) were shared with the Global Sustainability Standards Board (GSSB) for consideration in the development of the Topic Standards for Climate Change and Just Transition, and Energy. This document provides a summary of how the GSSB has responded to the significant issues raised in the public comment period.

The full set of comments received can be downloaded from the [Topic Standard Project for Climate Change page](#) on the GSSB website.

GRI 102: Climate Change and Just Transition 2025 can be downloaded [\[here\]](#).

Introduction

Objectives for revising the GRI climate change-related disclosures

The [project proposal](#) for the review of the climate change-related disclosures in *GRI 302: Energy 2016*, *GRI 305: Emissions 2016* (Disclosures 305-1 to 305-5), and *GRI 201: Economic Performance 2016* (Disclosure 201-2: Financial implications and other risks and opportunities due to climate change) was approved by the GSSB, GRI's independent standard-setting body, at its meeting on February 2023. The project's primary objective was to review the GRI climate change-related disclosures to represent internationally agreed best practice and align with recent developments and the relevant authoritative intergovernmental instruments in the field of climate change. The project also aimed to incorporate new issues to reflect the stakeholders' expectations related to reporting climate change-related impacts that have evolved and broadened beyond energy and GHG emissions reporting.

The project followed the [GSSB Due Process Protocol](#). In May 2023, the GSSB appointed a multi-stakeholder [technical committee](#) of 13 experts representing all five GRI constituencies. The technical committee informed the revision of the Standards by convening throughout 2023-2024 in seven meetings.

Scope of the public comment

The Climate Change and Energy Standard exposure drafts were open for public comment, as required by the [GSSB Due Process Protocol](#), from 21 November 2023 to 29 February 2024.

Respondents were invited to submit feedback on the clarity, feasibility, and relevance of the significant proposals in the exposure drafts.

Several outreach activities were carried out during the public comment period, including four global webinars and ten regional events. Approximately 3,000 individuals registered for the global webinars, and almost 1,000 participants attended the regional webinars in Africa, China, Latin America, and North America. In addition, GRI participated in four events at COP 28. Through the outreach activities, GRI reached a global audience of over 10,000. [Appendix 1. Participation in regional events and webinars](#) contains an overview of these events.

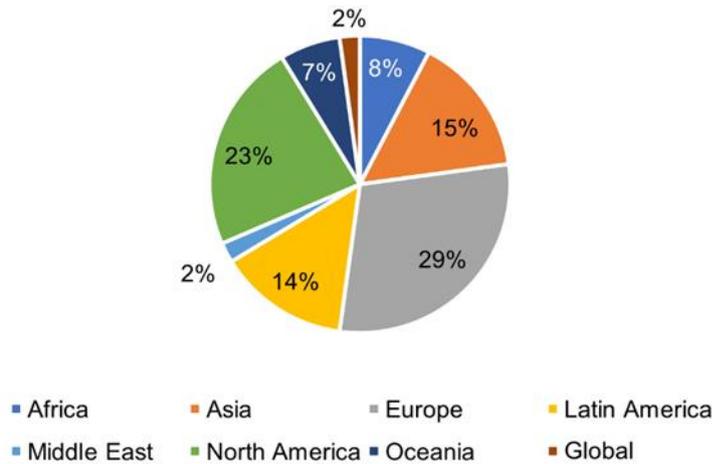
Comments collected during PCP activities such as workshops or webinars, though not considered official public comment submissions, were also taken into account when they aided understanding or flagged a significant issue not raised in the official submissions.

42 Overview of participation in public comment

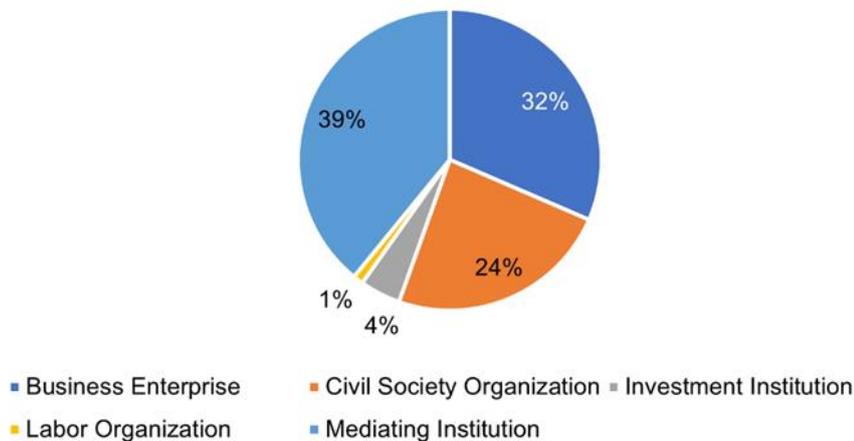
43 Respondents were invited to submit comments on the Climate Change and Energy exposure drafts using an
44 online survey. The link to the survey was made available on the Climate Change project page. Respondents
45 could also submit an official letter or statement to climate@globalreporting.org.

46 A total of 92 submissions from individuals and organizations were received, consisting of 89 completed
47 surveys and three letters. See Figures 1 and 2 for a breakdown of submissions by region and stakeholder
48 constituency. Submissions were received from all five stakeholder constituencies represented by the GSSB:
49 business enterprises, civil society organizations, investment institutions, labor, and mediating institutions.

50 **Figure 1. Breakdown of all submissions received by geographic region**



51 **Figure 2. Breakdown of all submissions received by constituency**



52 For more details on the submissions received, see:

- 53
- Full set of comments on the [Climate Change project page](#).

54 Methodology for analyzing comments

55 The Standards Division collated all comments submitted by respondents. Each comment was categorized by
56 disclosures. Then, each comment was analyzed by:

- type – e.g., requirement, guidance, general;
- theme – e.g., transition plan, CAPEX, biodiversity;

- category – e.g., clear, unclear, not feasible, redundant;
- action – e.g., draft, TC discussion, climate team discussion.

57 When a respondent raised several points in one comment, the points were separated into distinct comments.

58 The qualifiers indicated in Table 1 have been used to indicate the percentage of comments provided on
 59 specific items. Given that the survey mostly contained open questions to enable respondents to provide
 60 feedback on sections of interest, not all respondents provided comments on all sections of the exposure
 61 draft. Consequently, certain sections or disclosures have a relatively low number of comments compared to
 62 the overall number of comments.

63 Most of the feedback received on the Climate Change exposure draft falls into the qualifiers ‘one’, ‘a few’,
 64 and ‘some’. No feedback that falls into ‘many’ or ‘majority’ qualifiers was received.

65 The same qualifiers have been used to indicate the percentage of respondents who expressed support for
 66 the new disclosures and the clarity of the concept of mitigation hierarchy across the draft Standard.

67 **Table 1. Qualifiers indicating the percentage of comments/respondents.**

Qualifier	Comments
Majority	> 50%
Many	30-50%
Some	10-30%
A few	< 10%
One	1

68 Significant issues and GSSB responses

69 In line with the [GSSB Due Process Protocol](#), this section summarizes the significant issues raised by
 70 respondents, outlines proposed changes to the Climate Change Standard exposure draft, and explains why
 71 significant changes recommended by respondents were, or were not, accepted by the GSSB.

72 The significant issues identified have been organized into the following sections:

- 73 • Issues by disclosure
- 74 • Cross-cutting issues

75 This section includes references to the Climate Change exposure draft and the final version of *GRI 102:*
 76 *Climate Change and Just Transition 2025*. The titles in the exposure draft are used when referring to the
 77 content of the exposure draft. When referring to the content in the final Standard, the titles in *GRI 102:*
 78 *Climate Change and Just Transition 2025* are used.

79 Where text from *GRI 102: Climate Change and Just Transition 2025* is different from that in the exposure
 80 draft, the wording is provided in bold throughout the basis for conclusion.

81 GRI 102: Climate Change and Just Transition

82 Issues by disclosure

83 **CC-1 Transition plan (Disclosure 102-1 in the final Standard)**

84 Many respondents expressed overall positive feedback on the new Disclosure CC-1 Transition plan, stating
85 that GRI's Climate Change exposure draft recognizes the importance of transition planning and transition
86 plan reporting. Moreover, disclosures on transition (CC-1) and adaptation (CC-2) were deemed critical
87 additions to this draft, reinforcing that stakeholders' expectations have broadened beyond emissions
88 reporting.

a) Scenario analysis

89 A few comments suggested requiring, rather than recommending, organizations to disclose which climate
90 scenarios were used to develop the transition plan.

91 GSSB response: adding climate change-related scenarios to requirement 102-1-b was decided.

b) Investments in a transition plan

92 Some comments suggested considering a different wording rather than investment (including 'financing',
93 'resourcing', 'spend', etc.) in requirement CC-1-c.

94 GRI received a few comments on how to report investment using Capex and Opex, namely:

- 95 • On the complexity of reporting CapEx without referencing legislation such as the EU Taxonomy.
- 96 • Recommending that OpEx should have the same emphasis as CapEx in the guidance.
- 97 • One comment suggested requiring CAPEX amounts invested in fossil fuel-related activities,
98 including coal, oil, and gas. GRI received another comment about changing the 'can' to a 'should' to
99 report CapEx amounts invested in fossil fuel-related activities.

100 GSSB response: Different wording was evaluated, and the conclusion was that the term 'investment' was
101 changed to 'expenditure'. Additional guidance was provided to facilitate reconciliation with the organization's
102 financial information.

103 A reference to taxonomies was included in the guidance to clarify that organizations can use regional or
104 national taxonomies to report requirement 102-1-c. GRI added the reference to regional and national
105 taxonomies, as some are considered best practices with no globally accepted taxonomy available.

106 It was agreed to place the same emphasis on CapEx and OpEx in the guidance.

107 The guidance for reporting the expenditure incurred from fossil fuel-related activities has been changed from
108 a possibility ('can') to a recommendation ('should') rather than a requirement, as this information is
109 considered more relevant in a sector-specific context.

110 Moreover, the expenditure requirements and related guidance in the adaptation plan disclosure (102-2-b-iii)
111 were updated to align consistently with 102-1-c.

c) Process of preparing a just transition plan

112 A few comments suggested referencing the process of preparing a just transition plan in this disclosure and
113 also including qualitative metrics.

114 GSSB response: It was agreed to add qualitative information on the just transition in requirement 102-1-g as
115 follows: 'describe how the transition plan aligns with just transition principles'.

116 **CC-2 Adaptation plan (Disclosure 102-2 in the final Standard)**

117 The majority of the respondents provided positive feedback on this disclosure, with particular appreciation for
118 its clarity.

a) Transition and adaptation plan disclosures

119 A few comments were received to keep the two disclosures separate, while others questioned whether
120 transition and adaptation plans should be separate disclosures, as certain aspects are common for both
121 plans (e.g., governance).

122 GSSB response: It was agreed to maintain transition and adaptation plans as separate disclosures as
123 transition and adaptation strategies may lead to different sets of impacts to be disclosed. In order to address
124 the comments received, guidance was included in both disclosures to clarify that the transition and
125 adaptation strategies are interconnected and might have common elements.

b) Transition and physical risks and financial risks

126 A few comments were received on how transition and physical risks and opportunities are included in the
127 disclosure, asking for explanations, more examples, and additional guidance.

128 A few comments were related to financial materiality, asking for additional guidance on the potential financial
129 risks on organizations, additional indicators on how climate risks and opportunities assessment are
130 incorporated in strategic or business decisions, alignment with International Financial Reporting Standards
131 (IFRS) metrics to a maximum extent, and how Disclosure 201-2 is incorporated in this disclosure.

132 GSSB response: Further examples of transition and physical risks were included in the guidance to 102-2-a.
133 The reference to transition risks was maintained in 102-2 as both transition and physical risks can be
134 relevant for climate change adaptation.

135 No further content on financial risks in the organization has been included, as it is covered in other standards
136 that focus on climate change-related financial disclosures. The GRI Standards' purpose is to enable an
137 organization to publicly disclose its most significant impacts on the economy, environment, and people,
138 including impacts on their human rights and how the organization manages these impacts.

139 Any reference to risks and opportunities in GRI 102 Climate Change and Just Transition Standard is
140 included in relation to impacts, aiming to support reporters in reporting their impacts.

c) Impacts to be reported under Disclosure 102-2 Climate change adaptation plan

141 A few comments asked to clarify the difference between the impacts covered in requirements CC-2-a and
142 CC-2-c.

143 A few comments stated that assessing the impact of an organization's adaptation efforts on stakeholders is
144 complex, and they asked for additional guidance and examples. Respondents also asked for clarification on
145 how impacts are related to climate-related risks and whether positive and negative impacts are included.

146 A few comments enquired whether the adaptation plan and impacts to be reported refer to the whole
147 organization's value chain or only to its own operations.

148 GSSB response: The following clarification was added in requirement 102-2-a: [Describe the impacts on
149 people and environment, associated with its climate change-related risks and opportunities **and how they**
150 **were considered in the development of the adaptation plan**].

151 Furthermore, the following clarification was added in requirement 102-2-c: [Describe the impacts on people
152 and the environment **from implementing** the adaptation plan(...)].

153 Moreover, additional guidance clarifies that the impacts to be reported under requirements 102-2-a and 102-
154 2-c are the organization's impacts. Based on *GRI 3*, the organization's impacts include those that the
155 organization causes, contributes to, and is directly linked to.

156 Examples were provided for clarity on disclosing impacts under both requirements.

157 Additional guidance clarifies that organizations should consider their own activities and upstream and
158 downstream value chains when reporting on adaptation plans under Disclosure 102-2.

d) Resilience

159 A few comments were received asking for references to resilience in the adaptation plan disclosure and in
160 relation to adaptation targets.

161 GSSB response: It was decided not to reference resilience in Disclosure 102-2 since GRI focuses on
162 impacts and resilience was considered a concept more related to financial materiality, covered in other
163 reporting standards that focus on climate change-related financial disclosures.

e) Adaptation targets

164 A few comments were received on adaptation targets, asking for clarifications and more guidance on which
165 targets should be included.

166 GSSB response: Additional guidance, including examples of climate adaptation targets, was developed.

f) Scenario analysis

167 A few comments were received on scenario analysis, asking for clarifications on which scenarios should be
168 used.

169 GSSB response: Guidance was added stating that [**The Intergovernmental Panel on Climate Change**
170 **(IPCC) outlines scenarios based on the latest science. If the organization does not use IPCC**
171 **scenarios, it should report the reasons for choosing another source and explain how they align with**
172 **the latest science**].

CC-3 Just transition (Disclosure 102-3 in the final Standard)

174 Many respondents supported this new just transition disclosure, welcoming the proposal of a set of
175 standardized metrics under CC-3 as a beneficial addition to the management disclosures on transition (CC-
176 1) and adaptation (CC-2). Furthermore, respondents agreed that it provides further insights into the impacts
177 on workers and local communities and the subsequent actions taken to manage those impacts.

a) Just transition and adaptation

178 A few comments stated that just transition should relate to both an organization's transition and adaptation
179 plans.

180 GSSB response: The chapeau has been changed to clarify that Disclosure 102-3 refers to both transition
181 and adaptation efforts as follows: [In the context of its transition **or adaptation efforts**, the organization shall
182 [report].]

183 Further references to adaptation were included in the guidance.

184 Moreover, in Disclosure 102-2, a requirement (102-2-b-vi) was added to describe how the adaptation plan is
185 aligned with just transition principles.

b) Scope and structure of Disclosure 102-3 Just transition

186 A few comments were received on clarifying whether the scope of the disclosure included the organization's
187 value chain, specifically on the requirements for jobs created, eliminated, and redeployed.

188 A few comments were received on replacing the term jobs with employees/workers.

189 GSSB response: The terms 'employees' and 'workers who are not employees' replaced the term 'jobs' to
190 clarify the disclosure's scope. The structure of the disclosure was rearranged in order to clearly reflect the
191 scope of each requirement, using the terms 'employees' (requirement 102-3-a to 102-3-d), 'workers who are
192 not employees' (requirement 102-3-e and 102-3-f), or both (requirement 102-3-g).

193 It should be noted that, in the GRI Climate Change and Just Transition Standard, 'workers who are not
194 employees' refers to workers who are not employees and whose work is controlled by the organization,
195 which aligns with the [GRI labor-related draft Standards](#).

c) Gender breakdown in Disclosure 102-3 Just transition

196 A few comments were received on adding gender breakdowns to the disclosure requirements.

197 GSSB response: The gender breakdown in the guidance was moved from requirements 102-3-a to 102-3-f.

d) Total employees redeployed (requirement 102-3-c)

198 One comment suggested requiring organizations to report the total number of redeployed employees instead
199 of disclosing the ratio.

200 GSSB response: It was decided to change the requirement to disclose the total number of employees
201 redeployed instead of disclosing the ratio.

e) Basic pay and the cost-of-living estimates

202 A few comments were received on the 'adequate remuneration' concept, suggesting to refer to
203 'living/minimum wage' instead.

204 GSSB response: The GRI Labor Standards are the main reference for labor-related matters. It was decided
205 to add a new requirement with quantitative and qualitative information in alignment with GRI Remuneration
206 and Working Time (REWO) draft Standard, Disclosures REWO 4-e and 4-f, as follows:

207 The organization shall: **[report the total number and percentage of new employees recruited whose
208 basic pay is at or above the cost-of-living estimate, and describe actions taken or commitments
209 made to address any gaps between basic pay and the cost-of-living estimate for workers reported
210 under 102-3-a and 102-3-e].**

f) New requirement on methodology to report on Disclosure 102-3

211 A few comments requested additional guidance on the methodology to report Disclosure CC-3, highlighting
212 the complexity of accurately analyzing whether the change in the number of workers is due to climate
213 change adaptation/transition efforts or changes in business conditions and business structure.

214 GSSB response: It was agreed on the importance of maintaining the requirements 102-3-a, 102-3-b, and
215 102-3-c as they provide important information on the impacts on workers of transition and adaptation efforts,
216 placing the human aspect at the core of climate strategies. It was agreed to include a new requirement (102-
217 3-j) to report contextual information necessary to understand how the data has been compiled, including
218 standards, methodologies, and assumptions used as follows:

219 The organization shall: **[report contextual information necessary to understand the data reported under
220 102-3 and describe the methodologies and assumptions used to compile the data, including whether
221 the numbers are reported:**

- 222 **i. in head count, full-time equivalent (FTE), or using another methodology;**
- 223 **ii. at the end of the reporting period, as an average across the reporting period, or using another**
224 **methodology].**

225 Moreover, it was agreed to add guidance text to clarify that if the organization cannot directly calculate the
226 numbers reported under 102-3-a through 102-3-f, it can report estimates and explain these under 102-3-j.

g) Decent work and just transition principles

227 A few comments were received on incorporating decent work and just transition principles in the
228 requirements so that the disclosure enables organizations to report more broadly on the social impacts of
229 transition.

230 GSSB response: A reference to just transition principles was included in both transition and adaptation
231 requirements (102-1-g and 102-2-b-vi) and relevant guidance. Moreover, in the guidance to 102-1-g, the
232 definition of just transition from International Labour Organization (ILO) was included, mentioning that a just
233 transition creates decent work opportunities and leaves no one behind.

CC-4 GHG emissions reduction targets and progress (Disclosure 102-4 in the final Standard)

234 The majority of respondents provided positive feedback on the disclosure, appreciating the information it
235 provides to assess an organization's decarbonization journey. Respondents deemed the requirements and
236 associated guidance very clear and detailed.
237
238

a) Target boundary

239 A few comments were received suggesting including specific content for transparency on a target boundary
240 and its alignment with the full organizational inventory boundary.

241 GSSB response: It was made explicit in requirement 102-4-a-ii that Scope 1 and Scope 2 GHG emissions
242 targets shall cover the total Scope 1 and Scope 2 GHG emissions reported under Disclosures 102-5 and
243 102-6. Further clarifications were added to the guidance on target boundary and alignment with the inventory
244 boundary for Scope 1, Scope 2, and Scope 3.

b) Separate or combined targets

245 A few comments were received that require organizations to report only separate targets and to remove the
246 option to report combined targets. Another comment suggested, in the case of combined targets, requiring
247 an organization to disclose the share related to each respective GHG emission scope.

248 GSSB response: It was agreed to require that an organization reports combined targets limited to the
249 combination of Scope 1 and 2 in requirement 102-4-a-i. In this case, a recommendation was included to
250 report: **[The percentage that each scope represents compared to the total GHG emissions included in**
251 **the (combined) target]**.

c) Market-based targets

252 A few comments were received on market-based targets, with one stating that it should be required rather
253 than recommended to report whether the emissions reduction targets are set using the location-based or
254 market-based approach. Different comments disagreed on which method should be prioritized.

255 GSSB response: In order to seek transparency in reporting, requirement 102-4-c has been amended and
256 now clarifies that the organization shall report: **[for each gross Scope 2 GHG emissions reduction target,**
257 **report whether the targets use the location-based or market-based method]**.

a) Target timeframe

258 A few comments were received asking to require interim or medium-term targets. A few comments were
259 received on short- and long-term targets, asking for more guidance.

260 GSSB response: medium-term targets were added to the requirement 102-4-a. Further guidance and
261 examples clarify the differences in short-, medium-, and long-term timeframes and recommend reporting how
262 an organization defines them.

b) Scope 3 GHG emissions target

263 A few comments were received on Scope 3 targets, with comments requesting more guidance. A few
264 comments suggested that the Scope 3 target should not be required, as these are extremely challenging to
265 meet.

266 GSSB response: It was acknowledged that there is an urgency for organizations to set Scope 3 targets and
267 make progress; therefore, it was agreed to maintain the requirement for Scope 3 targets.

c) Base year

268 A few comments were received on the base year, requesting additional guidance. A comment highlighted
269 that this requirement was duplicated under the Scopes disclosures.

270 GSSB response: A new guidance for requirement 102-4-h-i was created to encourage consistency between
271 the base year selected for the scopes inventory and the base year selected for the targets. Moreover, a
272 reference was provided to the GHG Protocol Corporate Standard for further information.

d) Progress against the target

273 A few comments were received on CC-4-f (on how the progress of the target was achieved), asking for
274 additional guidance, as it is difficult to attribute the progress of the targets to different factors and demand
275 separation.

276 GSSB response: The requirement 102-4-j (on progress against targets) was updated, resulting in only two
277 sub-bullets (i.e., reductions as a result of the organization's initiatives and other factors). The guidance was
278 also amended accordingly.

e) Target revision policy

279 A few comments were received on the target revision policy, mainly asking for more guidance on how to
280 report it.

281 GSSB response: Guidance was created for requirement 102-4-g, including that under this requirement the
282 organization can report the frequency of updating its GHG emissions reduction targets and that it should also
283 report the main reasons for revising its GHG emissions reduction target. Examples of reasons for revising
284 the targets were added.

Scopes 1, 2, and 3 GHG emissions (Disclosures 102-5 to 102-8 in the final Standard)

a) Scopes reporting challenges (Scope 2 market-based breakdown by gases)

286 A few comments were received regarding specific challenges of reporting scopes, focusing mainly on Scope
287 3 reporting, followed by biogenic emissions' breakdown by gases.

288 GSSB response: After consultation with technical experts and best-in-class reporters, the relevance of the
289 scope requirements was confirmed.

290 It was agreed to move Scope 2 market-based breakdown by gases to the guidance due to the difficulty
291 foreseen in reporting the relevant data.

b) Consolidation approach

292 A few comments addressed the topic of consolidation approach and interoperability with other reporting
293 standards and frameworks.

294 GSSB response: For the consolidation approach, it was decided to keep the requirement as it is, allowing the
295 choice between equity share, operational control, and financial control in alignment with the GHG Protocol,
296 which is a globally accepted methodology. In addition, it was decided to add the following guidance text, in
297 line with *GRI 2: General Disclosures 2021*, to ensure interoperability with both the IFRS and European
298 Sustainability Reporting Standards (ESRS): **[If the organization includes entities in its sustainability
299 reporting that are not included in its financial reporting, it should report their gross Scope 1 GHG
300 emissions data separately (e.g., from associates, joint ventures, and unconsolidated subsidiaries)].**

c) Scope 2 market-based approach

301 On Scope 2, a few comments were received on the market-based approach, including how to use the
302 residual mix and quality criteria, mostly on temporal and physical connection and its applicability to global
303 markets.

304 GSSB response: In order to facilitate the applicability of quality criteria for all the contractual instruments in
305 all jurisdictions, the quality criteria on physical and temporal connection were rephrased and aligned with
306 GHG Protocol Scope 2 Guidance. Guidance to 102-6-a was modified to recommend that organizations
307 describe how they strive for temporal and physical connection for contractual instruments. Examples were
308 included.

d) Global warming potential (GWP)

309 A few comments were received on GWP, suggesting removing the reference to the latest Intergovernmental
310 Panel on Climate Change (IPCC) report. The comments noted that this requirement will often lead to
311 emissions recalculation, as organizations usually do not use the latest IPCC GWP values. Also, comments
312 noted that sometimes nationally calculated emission factors are not updated to the latest IPCC report, and
313 therefore, organizations will need to recalculate emissions.

314 GSSB response: It was decided to keep the latest IPCC GWP values as a requirement as it is best practice
315 and for interoperability purposes (namely with ESRS E1 and IFRS S2).

316 **CC-5 GHG removals in the value chain (Disclosure 102-9 in the final Standard)**

317 Many respondents expressed positive feedback to the disclosure on GHG removals, particularly appreciating
318 its clarity and acknowledging that the guidance provides comprehensive instructions on reporting GHG
319 removals, quality criteria, intended use, methodologies, impacts, and stakeholder engagement.

a) Scope 3 GHG removals

320 A few comments were received on the unfeasibility of reporting Scope 3 removals.

321 GSSB response: In light of the difficulties in reporting Scope 3 GHG removals, it was agreed to remove the
322 requirement to report Scope 3 removals and move it to the guidance.

b) Quality criteria for each type of storage pool

323 A comment was received on quality criteria (requirement CC-5-b), stating that it may be too granular to
324 require organizations to disclose how quality criteria are monitored at the level of each storage pool.

325 GSSB response: It was decided to amend requirement 102-9-b so that monitoring of quality criteria is
326 reported for each type of storage pool (land-based pools or geologic pools) and not for each storage pool, as
327 it may be too granular.

c) Product pools

328 A few comments were received on why product pools are excluded from the disclosure.

329 GSSB response: After consultation with technical experts on the matter, including GHG Protocol experts, it
330 was decided not to add a reference to product pools as there is no global consensus to categorize product
331 pools as removals, while guidance on product pools is also under development.

d) Impacts associated with GHG removals

332 A few comments were received on the need for further clarification on how to report on impacts associated
333 with GHG removals within and beyond the value chain and on how to report impacts on people and
334 biodiversity.

335 GSSB response: Examples were provided for both impacts on people and biodiversity, including positive and
336 negative impacts. The distinction between impacts within and beyond the value chain was removed as both
337 are included in GRI's definition of 'impacts'.

338 To increase transparency in reporting and ease the connection among GRI Standards, a reference to *GRI*
339 *101: Biodiversity 2024's* requirement on synergies and trade-offs between actions to manage biodiversity
340 and climate change impacts was added to the guidance to 102-9-d-ii.

341 **CC-6 Carbon credits (Disclosure 102-10 in the final Standard)**

342 Respondents recognized that transparency in relation to the use of carbon credits is key to ensuring robust
343 and credible carbon markets. Many respondents expressed positive feedback, welcoming this push for
344 greater transparency on purchasing carbon credits and deeming the requirements and associated guidance
345 clear and comprehensive, ensuring transparency in reporting and adherence to quality criteria.

a) Quality criteria

346 A few comments were received on quality criteria and over-reporting. Respondents stated that information
347 on quality criteria is available in project registries, asking whether a reference to certification/quality
348 standards or project registries would be sufficient.

349 Other comments pointed out that in some instances, local regulations may allow organizations to cancel
350 credits that do not respect all the quality criteria listed in the requirement.

351 Moreover, a few comments suggested including a reference to sustainable development benefits and
352 safeguards.

353 GSSB response: It was agreed that the requirement on quality criteria (102-10-c) is important information to
354 be reported by organizations for transparency, and therefore it was decided to keep it. In order to address

355 comments on quality criteria and over-reporting as well as comments on the responsibility of carbon credit
356 registries and their verifiers, the guidance to 102-10-c was updated to include the following: **[If third parties**
357 **report and publish information on quality criteria for carbon credit projects, the organization can**
358 **provide a reference to where this information can be found, as long as all quality criteria are**
359 **covered]**.

360 Moreover, it was agreed that the requirement of adherence to all quality criteria should be kept in line with
361 global authoritative methodology. A dedicated FAQ will be developed in the case an organization is
362 subjected to national legislation that may allow it to cancel credits that do not respect all the quality criteria
363 listed in the requirement.

364 Regarding safeguards, the concept of sustainable development benefits and safeguards is already covered
365 under requirement 102-10-e, and a sentence to clarify this was added to the guidance.

b) Issuing registry, host country and certification standard

366 One comment suggested requiring organizations to report the issuing registry, host country, and certification
367 standard.

368 GSSB response: requirement 102-10-b was expanded to require organizations to report the carbon credit
369 project host country and issuing registry. The certification standard is covered under the quality criteria
370 requirement 102-10-c-vii (independent validation and verification). It was agreed to include a
371 recommendation to report the specific certifications provided by the third parties in the guidance for 102-10-
372 c-vii.

c) Timeframe to monitor carbon credit projects: quality criteria and impacts

373 One comment suggested clarifying how long the organization should monitor quality criteria and the positive
374 and negative impacts of carbon credits purchased and canceled.

375 GSSB response: It was agreed to add that the organization should report data monitoring processes
376 throughout the crediting period in the guidance to 102-10-c-vi, along with the timeframes for each carbon
377 credit project's crediting and monitoring periods.

378 Regarding the monitoring of impacts reported under 102-10-e, it was agreed to add to the guidance that
379 organizations should disclose the timeframe of the monitoring period for the impacts associated with the
380 carbon credits purchased.

d) Impacts

381 A few comments questioned whether organizations should report the impacts and trade-offs associated with
382 carbon credit projects, as these are under the responsibility of carbon credit registries and their verifiers.

383 GSSB response: It was agreed that the requirement on impacts is important to include because it ensures
384 transparency and promotes a due diligence process when purchasing carbon credits. This requirement also
385 encourages organizations to select carbon credit projects that maximize positive impacts and prevent or
386 mitigate negative impacts on people and the environment.

387 A sentence was added to the guidance to 102-10-e to allow the organization to report if it has obtained third-
388 party social or environmental integrity certification.

Cross-cutting issues

a) Interoperability

390 A few comments highlighted the importance of having the highest possible level of **interoperability** with
391 other standards and frameworks, such as IFRS Sustainability Disclosure Standards and ESRS.

392 GSSB response: Since the beginning of the project, efforts were made to ensure alignment to a great extent
393 and interoperability with other global standards like IFRS S2 and regulatory standards like ESRS E1 as well
394 as with GHG emissions accounting standards, such as the GHG Protocol. Moreover, experts from global and
395 regional regulatory standards setters were involved in the TC and as peer reviewers in developing the GRI
396 Climate Change and Energy drafts.

b) Reference to GRI 101: Biodiversity 2024 and other environmental impacts

397 A few comments were received on **biodiversity**, most of them suggesting clarifying the examples of impacts
398 on biodiversity and adding, where possible, further references to *GRI 101*. Two comments suggested
399 broadening the wording from 'biodiversity' to 'environment'.

400 GSSB response: The reference to *GRI 101* was present across the Standard. Moreover, additional examples
401 of impacts on biodiversity were incorporated across the Standard.

402 Across the Climate Change and Just Transition Standard, requirements to report impacts associated with the
403 transition plan, adaptation plan, GHG removals, and carbon credits were clarified to require reporting
404 environmental impacts, including specific impacts on biodiversity.

c) Sectoral guidance

405 A few comments noted that further sectoral guidance on climate change topics is needed.

406 GSSB response: Any feedback on additional sectoral guidance needed will be passed to the relevant GRI
407 Sector Standards projects to be used in the development of the future Sector Standards.

d) Mitigation hierarchy

408 The majority of respondents agreed on the clarity of messaging that the primary mitigation action is to reduce
409 GHG emissions across the Standard.

410 A few comments were received on the need for more flexibility in the percentage of residual emissions (e.g.,
411 in the FLAG sector). A few comments suggested not referencing the Science Based Targets initiative (SBTi)
412 as it may be complex for organizations not aligned with such programs.

413 GSSB response: The following text was already included in the Standard under Guidance to 102-1-f-iii, and it
414 was agreed to account for enough flexibility in different sectors: [If an organization is subjected to sectoral
415 decarbonization pathways, it may be subjected to a different percentage of GHG emissions reduction].
416 Guidance to 102-9-c on uses of removals was also amended to acknowledge that, in the context of a net-
417 zero emissions target, if an organization is subjected to sectoral decarbonization pathways, it may be
418 subjected to a different percentage of GHG emissions reduction.

419 Technical experts were consulted on the matter and they advised that the existing reference to the
420 percentage of residual emissions remain in order to raise ambition.

e) Assurance

421 A few comments were received stating that assurance of GRI disclosures would be important to enhance
422 reporting robustness. Moreover, a few comments on third-party verification of GHG emissions reduction
423 targets were received, asking whether a third party verified or assured the targets and correspondent GHG
424 inventory.

425 GSSB response: In GRI Standards, external assurance is managed throughout *GRI 2* (i.e. Disclosure 2-5
426 External assurance) and not addressed by specific Topic Standards. Therefore, no further changes were
427 deemed necessary in the Climate Change and Just Transition Standard.

428 Due to the relevance of third-party verification in the context of GHG emissions reduction targets, additional
429 guidance for 102-4-k was developed as follows: [The organization should report whether an independent
430 third party has validated the GHG emissions reduction targets and related progress, **and if so, which party
431 conducted the validation and the standard or methodology used**].

432 **Appendix 1. Participation in regional**
 433 **events and webinars**

434 **Table 2: Overview of events and webinars**

Events	Date	Number of attendees
Global webinar – morning session	28 November 2023	946 attendees 2481 registered
Global webinar – afternoon session	28 November 2023	603 attendees 1758 registered
COP28 - Systematic transformation with circularity in mind (Sustainable Innovation Forum)	5 December 2023	N/A
COP28 - Climate – Nature nexus in global sustainability reporting	6 December 2023	N/A
COP28 - Frameworks and Standards for nature and climate	9 December 2023	30 attendees
COP28 - Impact of corporate disclosures on climate action, learnings from the energy sector, and the feasibility of using methane disclosures in the agri-food	5 December 2023	N/A
Global Q&A webinar – morning session	18 January 2024	844 attendees 2542 registered
Global Q&A webinar – afternoon session	24 January 2024	539 attendees 1630 registered
Africa		
Alternative Mining Indaba	7 February 2024	20 attendees
Webinar for Africa	20 February 2024	109 attendees
China		
Stock Exchange Event (Syntao) - China SIF Annual Conference	5 December 2023	110 attendees
2024 CSO Global Summit (Syntao annual meeting)	16 January 2024	200 attendees
2024 CSO - GRI Climate Change & Energy workshop	16 January 2024	40 attendees
Webinar for China	30 January 2024	125 attendees
Latin America		
UNEP FI LATAM Roundtable	30 January 2024	400 attendees
Webinar for Latin America (in Spanish)	22 February 2024	368 attendees 959 registered
Webinar for Latin America (in Portuguese)	21 February 2024	154 attendees 364 registered
North America		
GreenBiz	13 February 2024	35 attendees
Webinar for West Coast	21 February 2024	173 attendees 330 registered
Total		