The Climate Registry

December 15, 2010

Clerk of the Board
Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Amendments to the Regulation for Mandatory Reporting of Greenhouse Gas Emissions

Dear Members of the Board:

On behalf of The Climate Registry (The Registry), we thank you for the opportunity to comment on the proposed "Amendments to the Regulation for Mandatory Reporting of Greenhouse Gas Emissions." The Climate Registry is a nonprofit collaboration among North American states, provinces, territories and Native Sovereign Nations that sets consistent and transparent standards to calculate, verify and publicly report greenhouse gas emissions into a single registry. The Registry supports both voluntary and mandatory reporting programs and provides comprehensive, accurate data to reduce greenhouse gas emissions.

The Registry's comments on the rule are confined to the aspect of accreditation of verification bodies. The Registry requires that all verification bodies seeking to provide verification services to support The Registry's voluntary program be accredited to the internationally-recognized ISO 14065[1] standard. The principles of the standard include impartiality, competence, and confidentiality. Verification bodies accredited to ISO 14065 must adhere to the verification principles, defined in ISO 14064-3[2], of independence, ethical conduct, fair presentation, and due professional care.

Since 2008, The Registry has been partnered with the American National Standards Institute (ANSI) to administer the accreditation of verification bodies for our program. The Registry has found great value in the ISO 14065 accreditation program because it provides our program and our stakeholders with confidence that our verification bodies have systems and procedures in place to consistently deliver high-quality verification services in accordance with program requirements. ANSI's three-year accreditation cycle, which requires annual surveillance, provides assurance to The Registry that our verification bodies continue to conform to the international standards for GHG verification. The accreditation services provided by ANSI greatly reduce the oversight activities that would otherwise be necessary to ensure the integrity of our program.

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[1] ISO 14065:2007, *Greenhouse gases – Requirements for greenhouse gas validation and verification bodies for use in accreditation or other forms of recognition*.

[2] ISO 14064-3:2006, *Greenhouse gases – Specification with guidance for the validation and verification of greenhouse gas assertions*

In addition to The Climate Registry, several other voluntary and mandatory programs such as the Climate Action Reserve, the Pacific Carbon Trust, the American Carbon Registry, the Voluntary Carbon Standard Association, the Regional Greenhouse Gas Initiative, the Massachusetts Department of Environmental Protection, and the Western Climate Initiative (WCI) recognize ISO 14065 accredited bodies.

As more GHG programs rely on the ISO 14065 accreditation process, the process is becoming even more cost-effective for verification bodies as they consolidate the cost of accreditation across multiple schemes. GHG programs that rely on ISO 14065 accreditation also need fewer resources to ensure the competency of and oversee the activities of the verification bodies that service their program.

In conclusion, The Registry urges the California Air Resources Board (CARB) to recognize ISO 14065-accredited verification bodies as qualified to conduct verifications under its rule. The Registry also urges CARB to amend its rule to be consistent with the WCI framework and regulations adopted by other WCI jurisdictions.

The Registry would welcome the opportunity to further discuss its positive experience in working with ANSI and the benefits we gain from ANSI's ISO 14065 accreditation program.

Sincerely,

The Climate Registry

Jackie Zorovich
Director of Verification Services