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September 16, 2016

California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

Dear ARB staff,

LRQA is concerned with the proposed change in the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions which would move the verification deadline from September 1st to August 1st. Much of the scheduling for our business outside of ARB work has been structured around the ARB September 1st deadline. A change to August 1st would have a significant impact on the number of verification projects (both ARB and other voluntary and mandatory programs) that LRQA would be able to perform in a given year with adverse effects on our bottom line.

Your analysis results stating verification bodies can more effectively use their time leading up to the verification deadline is likely not taking into consideration work verification bodies perform under programs not related to California initiatives. For instance, LRQA's team of verifiers are booked on verifications under a number of voluntary programs from early spring through the entire month of June. If ARB's analysis has not taken into consideration non-California related verification activities, the analysis has not adequately address LRQA's business situation and that of many of the other ARB accredited verification bodies. With the balance of schedules for various programs we work in, your suggestion that a more effective use of time with a shift to starting the verification cycle earlier would not alleviate the adverse effects on our business.

Taking into consideration the adverse effect this will have on the business of many of the ARB accredited verification bodies, if there is an adequate internal need for ARB schedule adjustments, we strongly encourage you to consider either a one or two week change rather than an entire month.

Sincerely,

Derek Markolf
Americas Technical Manager Climate Change

Improving performance, reducing risk

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