



REVIEW QUESTIONS FOR THE CALIFORNIA CLIMATE ACTION REGISTRY'S DRAFT CEMENT INDUSTRY PROTOCOLS

The California Climate Action Registry (Registry) provides the following questions to assist reviewers in offering comments or suggestions to the *Draft Cement Reporting and Certification* protocols.

General

1. The draft cement industry protocols aim to provide explicit guidance on the estimation, reporting, and certification of CO₂ emissions from processes that occur at a cement plant (calcination), and refers reporters to the General Reporting Protocol (GRP) for guidance on calculating GHG emissions from other sources, such as mobile or vehicle fleet emissions. The draft cement industry reporting protocol is not a stand-alone document; it is an appendix to the Registry's General Reporting Protocol (GRP). Is it clear that to complete a GHG emissions inventory for the Registry a cement company would rely on the GRP for the bulk of the guidance, and supplement it with the Cement Industry Reporting Protocol for process emissions?
2. Do these draft cement industry reporting and certification protocols present information in logical manner?
3. Are there sections of the protocols that you would suggest adding or deleting?
4. Within sections, is useful information missing?
5. Will the protocols promote more adequate and transparent annual emissions results for participants within the cement industry?
6. Is it clear the draft protocols only addresses entity-level emissions inventories and do not address reporting and certification of emission reduction projects in the cement industry? How important is it for the Registry to develop protocols for emission reduction projects within the cement industry?
7. Other general comments or suggestions?

Cement Reporting Protocol

1. Regarding the scope of GHGs to report, are the required entity-wide reporting components clear (all direct mobile, stationary, process, fugitive and indirect emissions)?
2. Are the sections in the draft cement reporting protocol that refer to the GRP for guidance on Registry reporting rules (i.e., boundary issues) or calculation methodologies (e.g., determining GHG emissions from mobile sources) helpful? Should the Registry omit all information on the sources the GRP covers?
3. To the best of your knowledge, are there inconsistencies with the GRP?
4. Do you believe the efficiency metric defined in the draft protocols is relevant and clearly presented?
5. Do you suggest adding other types of efficiency metrics?
6. Other comments or suggestions on the draft cement industry reporting protocol?

Emission Quantification Methodologies

1. The Registry provides two approaches for calculating CO₂ emissions: clinker-based and cement-based (shown in the appendix). Should it eliminate the cement-based approach as guidance for reporting purposes?
2. Do you find it useful to have guidance on both methodologies?
3. The WBCSD/WRI clinker-based Excel calculation tool provides a comprehensive array of activity data fields for multiple reports. The draft Cement Reporting Protocol provides only indicative activity data tables showing the type of data that would be needed to calculate emissions. The Registry intends to update its on-line calculation tool (CARROT) to completely support the data needs for emissions reporting, however, should the final Cement Reporting Protocol also provide more information on the activity data requirements?
4. Is the Registry's treatment of non-fossil fuel resources reasonable?
5. Other comments or suggestions related to quantification methodologies?

Certification

1. Can you suggest other certification best practices to aid in providing guidance for the certifiers regarding verification of emission estimates for the cement industry?
2. Do you have suggestions for the kinds of documentation the certifier should reference to verify GHG emissions of cement industry members?
3. Other comments or suggestions on the draft Cement Certification Protocol?