

## MEMORANDUM

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Principal, ENVIRON International

**SUBJECT: Public Comment: Local Government Operations Protocol**

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The Draft Local Government Operations Protocol states (p. 9):  
*The Protocol is not designed for quantifying the reductions from GHG mitigation projects that will be used as offsets. Offsets are discrete GHG reductions used to compensate for (i.e., offset) GHG emissions elsewhere. Offsets are calculated relative to a baseline that represents a hypothetical scenario for what emissions would have been in the absence of the project.*

*Project based GHG reductions that are to be used as offsets should be quantified using a project quantification method that addresses issues like baseline scenario, additionality, permanence and ownership. This Protocol does not address such issues and is not suitable for calculating reductions to be used as offsets in a voluntary or mandatory GHG reduction system.*

Question: Is there specific guidance from the Climate Registry and others for local government offsets? Or should local government rely on the Climate Action Reserve for guidance on offsets?