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What information should Ecology provide in its annual report?

Section 28(1)(b) of the Climate Commitment Act explicitly states that all “[p]rojects or activities funded from the [Climate Investment Account] must meet high labor standards”. To assess the implementation of this provision, the Department of Ecology should require all funding recipients to report data on job quantity and quality and provide this data to the legislature in its annual report. Reporting should cover all job categories, including not only construction but also operations and maintenance. Key indicators of job quality vary by job category and sector. The Department of Ecology should collaborate with labor unions to develop reporting job and sector-specific reporting metrics. This type of reporting is consistent with the Annual Tax Performance Reports for recipients of Washington tax incentives and the L&I certification created by the Clean Energy Transformation Act. All data on job quantity and quality for recipients of Climate Commitment Act revenue should be made publicly accessible in an easily searchable and actionable format.

What should Ecology consider when determining how to evaluate greenhouse gas emissions reductions from projects?

As the Department of Ecology is determining how to evaluate greenhouse gas emissions from projects, it is important that the agency keeps in mind the tremendous diversity of projects that may receive funding. The appropriate scale for measuring greenhouse gas impacts (i.e., facility/project-level vs. product-level) and the boundaries of that assessment will vary according to type of project. Particularly for manufacturing investments, it is important to assess greenhouse gas impacts at the product-level and to consider scope 3 emissions reductions. Many of the most significant emissions reductions opportunities for manufacturing may come from Washington manufacturers reducing the upstream, embodied carbon content of their products.