International Emissions Trading Association (Adarsh Srinivasan)

On behalf of our 300+ member companies, IETA appreciates this opportunity to provide feedback to CARB on the (15-Day) Proposed California Corporate Greenhouse Gas Reporting and Climate-Related Financial Risk Disclosure Initial Regulation.

Our full response is attached.

IETA

MAKING NET ZERO POSSIBLE

11 August 2026

IETA Comments on CARB's 15-Day Changes to the California *Corporate Greenhouse Gas Reporting and Climate-Related Financial Risk Disclosure Initial Regulation*

For more than 25 years, IETA has been the leading global business voice on robust market solutions to tackle climate change while driving clean finance at scale. Our organization represents a broad and diverse group of 300+ businesses, including those with clean assets, exposure and operations across California and the globe. IETA's expertise is regularly called upon to inform carbon market solutions that deliver measurable climate outcomes while addressing economic competitiveness and affordability concerns.

As in all jurisdictions, IETA supports practical and robust regulation to aid in climate-related transparency that recognizes and rewards rigorous corporate climate action. We recognize the practical concerns that led CARB to withdraw the initial SB 253 regulation submitted to OAL and propose 15-day changes that include delaying the reporting deadline from **10 August** to **10 November**. We encourage CARB to finalize the updated regulation as soon as possible and continue with broader implementation, including a rulemaking on Scope 3 reporting requirements.

IETA believes CARB should continue to focus on competitive decarbonization. Comprehensive emissions data is critical to achieving cost-effective decarbonization, so we applaud California's direction in requiring Scope 1-3 emissions reporting. As CARB has previously noted, GHG reporting laws already cover jurisdictions accounting for 59% of global GDP and 66% of global population. The EU and other jurisdictions are introducing Carbon Border Adjustment Mechanisms (CBAM) which rely on emissions data to determine importers' obligations. Thus, the GHG Reporting Program is increasingly important for California producers to participate in the global economy and for investors to complete their fiduciary duties.

As future rulemakings are conducted, **IETA urges CARB to continue closely tracking evolving international carbon accounting, reporting and disclosure frameworks**. A key recent update is the **announcement** that the GHG Protocol and ISO will combine to publish a single, harmonized corporate carbon accounting standard, aiming to finalize the consolidated joint corporate standard by **Q4 2028**.[1] This unified standard will consolidate updates already underway for the GHG Protocol's Scope 2, Scope 3, and Actions & Market Instruments workstreams, as well as ISO's 14060-01. As several jurisdictions bring forward similar legislation – all while major voluntary standards undergo updates – we remain concerned about fragmentation of disclosure rules and the challenges of interoperability across jurisdictions.

Going forward, we request that CARB **provides guidance on market-based instruments** used to meet voluntary climate targets and/or mitigate emissions. We previously pointed to the Task Force for Corporate Action Transparency (**TCAT**) for an example of a framework to disclose market instruments. IETA notes that the GHGP recently published the Actions and Market Instruments (AMI) Phase 1 White Paper.[2] **IETA's response** to GHGP's AMI Request for Feedback supports the introduction of a multi-statement reporting structure, which would support a market-based GHG inventory.[3] IETA requests CARB provide additional details on the interaction between the Reporting Program and GHG Protocol processes and updates to ensure that there is consistent, clarified treatment of market-based GHG action. We believe it would be logical for a company to disclose its investments in voluntary carbon credits and other market-based instruments alongside its GHG emissions inventory with separated attributional and consequential accounting formats, so that stakeholders can view the two in parallel.

With a global membership comprising a collective deep expertise in carbon markets and carbon accounting, IETA welcomes the chance to provide market insights and technical expertise to support CARB as the process continues. IETA appreciates this opportunity to provide feedback to CARB on the 15-day changes to the Corporate Greenhouse Gas Reporting and Climate-Related Financial Risk Disclosure regulation, and looks forward to future collaboration.

[1] https://ghgprotocol.org/blog/ghg-protocol-announces-key-standard-development-updates

[2] https://ghgprotocol.org/actions-and-market-instruments-standard

[3] https://www.ieta.org/response-to-the-ghg-protocols-rfi-on-the-actions-and-market-instruments-ami-phase-1-progress-update-white-paper