

# CALL FOR EVIDENCE ON THE EFFECTIVENESS OF THE USE OF ENVIRONMENTAL ATTRIBUTE CERTIFICATES IN CORPORATE CLIMATE TARGETS

September 2023













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# Introduction and Background

# About the Science Based Targets initiative

The Science Based Targets initiative (SBTi) drives ambitious corporate climate action by enabling businesses and financial institutions globally to set science-based greenhouse gas (GHG) emissions reduction targets. It was formed as a collaboration between CDP, the United Nations Global Compact, World Resources Institute (WRI), the World Wildlife Fund (WWF), and the We Mean Business Coalition.

The SBTi's goal is to enable companies worldwide to do what climate science requires of the global economy: to halve emissions by 2030, and achieve net-zero before 2050. We develop criteria and provide tools and guidance to enable businesses and financial institutions to set GHG emissions reduction targets in line with what science tells us is needed to keep global heating below 1.5°C.

# About this Call for Evidence

The SBTi has established widely adopted benchmarks for defining and assessing climate ambition in a standardized way. To date, the SBTi has enabled more than 3200 companies and financial institutions (FIs) to set validated climate targets in line with science, representing one third of the global economy by market capitalization; it is now essential that these are held accountable for delivering their targets.

The SBTi is presently engaged in research to examine how companies achieve their targets and determine the parameters that need to be considered for robust reporting and assessment of target progress and delivery, as well as for substantiating claims of target achievement. The research that SBTi is conducting is focused on two main areas:

- The first is dedicated to understanding how companies account for and disclose progress against targets in a robust, transparent and consistent manner. This involves identifying the key factors that need to be standardized to ensure consistency in the way companies measure and report progress against targets, considering decarbonization vis-a-vis other factors that lead to a change in estimated and reported emissions including structural, methodological or data variations.
- 2. The second is focused on understanding the types of interventions that can enable entities to make credible decarbonization claims across different activities and emission sources.

To inform this research, the SBTi is launching this Call for Evidence to explore the effectiveness or ineffectiveness of different instruments in delivering real-world decarbonization and in enabling corporate emission reduction claims.

The outcomes of this exercise will be made publicly accessible with the intention of assisting decision-makers in comprehending the existing evidence on this matter and facilitating well-informed decisions regarding the incorporation of these instruments into corporate climate targets.





It is important to note that this research is solely for investigative purposes. Any potential strategic decisions or changes to SBTi standards will be subject to thorough consideration, consultation and approval by the SBTi governance structures.

### Objectives of the Call for Evidence

The objective of this Call for Evidence is to gather evidence on specific roles environmental attribute certificates play in corporate decarbonization strategies and the specific impact they have had or may have, if any, to overall emissions reduction goals.

### Scope of the Call for Evidence

Environmental attribute certificates explored in this Call for Evidence include instruments that may be potentially eligible in abatement targets, including scope 1, 2 and 3 emissions. This Call for Evidence does not include instruments that may be used as part of neutralization targets or beyond value chain mitigation (BVCM) claims (e.g. removal credits). These will be explored as part of the development of further guidance and requirements on neutralization and Beyond Value Chain Mitigation (BVCM).

#### **Key Definitions**

Under this Call for Evidence, the SBTi defines environmental attribute certificates as instruments used to quantify, verify and track the environmental benefits associated with climate mitigation activities or projects. Environmental attribute certificates are used in different chains of custody models with varying traceability, e.g. from models where the activity issuing the certificate is traceable throughout the value chain to models where the certificate is traded separately from the underlying activity, not allowing traceability of the activity issuing the certificate to the value chain. Trading of these certificates may allow buyers to make claims, while also providing financial incentives to interventions that reduce greenhouse gas emissions, promote renewable energy or achieve other sustainability objectives.

Environmental attribute certificates can include:

- Energy attribute certificates for electricity
- Other energy carrier certificates, e.g. green hydrogen, green gas, Sustainable Aviation Fuel Certificates (SAFc)
- Emission reduction credits
- Certified commodities conveying a specific emission factor, e.g. green steel

# **Research Questions**

Respondents to this Call for Evidence should provide answers to the research questions listed below. The aim is to gather specific information on key impact areas under consideration which include, but are not limited to:









- a) reducing corporate GHG emissions,
- b) stimulating climate finance,
- c) promoting scale-up of low-carbon technologies,
- d) displacing high-emitting activities with lower emitting ones,

e) under what regulatory safeguards or market infrastructures, if any attribute certificates are, or would be, effective.

Please note we invite evidence submissions that provide a well-rounded perspective by addressing questions from positive, neutral and negative viewpoints. Detailed instructions on how to submit evidence are detailed in the following section<sup>1</sup>

- 1. What evidence exists about the effectiveness or ineffectiveness of environmental attribute certificates in delivering measurable emission reductions?
- 2. What evidence supports or opposes a causal link between specific operating conditions (geographies, regulatory schemes, presence or absence of tracking mechanisms or registries, etc.) and the effectiveness of environmental attribute certificates to deliver emission reductions? Which conditions?
- 3. What regulatory safeguards and market infrastructure, if any, would need to be put in place for environmental attribute certificates to be effective and sustainable?
- 4. What evidence supports or opposes the ability of environmental attribute certificates to accurately reflect and quantify emission reductions in the context of corporate climate abatement targets?
- 5. What evidence exists that uptake of attribute certificates leads to or hinders the transformation needed to reach climate stabilization?
- 6. What specific evidence-based claims can and cannot be made when employing environmental attribute certificates to corporate decarbonization?
- 7. Is there evidence that supports or undermines that the market value of this type of instrument is commensurate with the abatement costs of the underlying activity?
- 8. Is there evidence that shows that the use of these instruments (i.e. procurement of the attribute certificate) could contribute to scale-up of climate finance compared to alternative interventions? Or could it result in climate finance dilution?

The SBTi welcomes additional evidence or information that might support our inquiry but has not been covered in the research questions listed above.

<sup>&</sup>lt;sup>1</sup> Please cite specific evidence in your answer









# **Types of Evidence Sought**

Specific types of evidence that will be accepted for consideration include:<sup>2</sup>

### **Empirical Data and Research Studies:**

- Quantitative data from surveys, studies, modeling and observations.
- Qualitative data from interviews, focus groups and case studies.
- Academic research papers and peer-reviewed studies.

#### **Reports and Whitepapers:**

- Analytical reports, whitepapers and policy briefs from credible sources (i.e. sources which are considered trustworthy, reliable, and authoritative within the field of corporate decarbonization or other related fields).
- Reports from government agencies, research institutions and think tanks.

### **Statistical Information:**

- Relevant statistics, figures and trends that support or illustrate a position on the research questions.
- Data from official sources, statistical agencies and other public-access databases.

# Case Studies and Examples:

- Real-world examples that illustrate specific scenarios or outcomes that are documented publicly.
- Case studies showcasing the real-world or potential impact of certain decisions or policies pertaining to the use of attribute certificates.

# Surveys/polls:

- Surveys or polls that reflect expert opinion on the subject matter.
- Results from reputable polling organizations or research firms.

#### Legal and Regulatory Analysis:

- Legal opinions, analyses of relevant laws, and interpretations of regulations.
- Citations of relevant laws, regulations, and policies from relevant jurisdictions.

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<sup>&</sup>lt;sup>2</sup> Submissions are not required to include final peer-reviewed publications. Draft papers are also acceptable evidence.











#### Types of evidence ineligible under this Call:

- Standalone submissions of anecdotal evidence, individual expert opinions or testimonials, or opinion pieces, as well as social media posts, unverified internet sources and biased or commercial sources will not be considered as acceptable evidence. Other unacceptable types of evidence include copyrighted, confidential or sensitive materials.
- Please avoid submitting information that is behind paywalls, subscription barriers, or other access restrictions that may limit its availability.

# Submitting Evidence

# Instructions

Individuals or organizations can submit evidence via our <u>Online Submission Form</u>. The structure of the submission allows each submission to include up to five pieces of evidence. You may submit more than once if you have more than five pieces of evidence. You will be asked to describe how each piece of evidence addresses each of the research questions (if at all) and provide additional description of the evidence.

The structure of the Online Submission Form is as follows:

- 1) Provide contact Information:
  - Enter your full name, email address and any relevant affiliation or organization information (such as legal name of organization, registered head quarter in which country, not-for-profit or for profit, if for profit: parent company within group structure, subsidiary within group structure, independent legal entity or no group structure, job title).
- 2) Select the appropriate type of organization/stakeholder category:
  - Choose the stakeholder category that best represents your role or affiliation. Please refer to <u>Annex B</u> for descriptions of relevant stakeholder categories.
  - Provide a brief description of the organization and/or individual background
- 3) Disclose any potential conflict of interest -
  - In accordance with the SBTi Research Ethics Guidelines (see <u>Annex C</u>), contributors to this Call for Evidence shall include information regarding conflicts of interest. An actual conflict of interest in information submitted as evidence can be defined as a situation in which an individual or organization has interests in the outcome of such information that may lead to a personal or professional advantage and that might therefore compromise the integrity of the data provided. For example, if data provided as evidence is funded by an entity who may have interests in a particular set of outcomes. A perceived conflict of interest refers to a situation where an individual or











organization providing or presenting evidence is seen as having a potential bias or vested interest that could influence their objectivity or the integrity of the evidence they provide. If an individual or organization wishes to submit a piece of evidence which they authored, please review the SBTi Competing Interest Guidelines (see <u>Annex D</u> below).

- 4) Title and description. Do this one time for each unique piece of evidence you are submitting. You may submit up to five (5) unique pieces of evidence per form submission, but there is no limit in the number of form submissions.
  - Provide a clear and concise title for your evidence submission.
  - Optionally, include a 300-500 word cover letter summarizing the content and purpose of your evidence.
- 5) Upload evidence files. Do this one time for each unique piece of evidence you are submitting. You may submit up to five (5) unique pieces of evidence per form submission, but there is no limit in the number of form submissions.
  - Attach your evidence files using the provided upload button. Acceptable file formats include PDF, DOC, DOCX, JPG, PNG, GIF.
  - If your evidence is in a different file format, or if it includes multiple files, please send the evidence via email to <u>callforevidence@sciencebasedtargets.org</u> after submitting the form. Submission of evidence solely via email without the completed form will not be accepted. Please send this from the email address associated with the form submission and reference the title of the evidence.
- 6) Answer the online survey questions. Do this one time for each unique piece of evidence you are submitting. You may submit up to five (5) unique pieces of evidence per form submission, but there is no limit in the number of form submissions.
  - Please refer to <u>Annex A</u> for a list of survey questions. If your evidence includes data, statistics, or quotes from external sources, please provide accurate and complete citations or references.
- 7) Submit your evidence:
  - Click the "Submit" button to finalize your evidence submission.

# IMPORTANT: Please note that all evidence submissions provided in response to this Call for Evidence will be made freely accessible to the public.

# Timeline

Submission period: September 21, 2023 - November 24, 2023

Submission deadline: Friday, November 24, 2023 at 23:59 EST











After the end of the submission period, the SBTi will collect all evidence submitted and review it for relevance, credibility and quality. A summary report of the collected evidence (along with review criteria) and findings will be published following the evidence review period. Details on the timeline for the summary report and subsequent research on this topic will be communicated on the SBTi website.

# **Submission Permissions**

All submissions will be made publicly available by the SBTi along with information related to the submitting entity including the name of the affiliated organization (if relevant) and type of stakeholder category (please refer to <u>Annex B</u>). Email addresses and descriptions of individuals' backgrounds will not be disclosed, but the SBTi will not screen submissions for private, confidential or identifying information.

# Anonymous submissions will not be considered.

In the Online Submission Form you will be asked to give your permission for the following:

1. May we contact you to request clarification about your submission?

The submitter will also be asked to acknowledge and agree to the following terms.

- 1. I confirm that, to the best of my knowledge, the information I am submitting to this Call for Evidence is true and accurate; or that any inaccuracies or errors have been identified.
- 2. I confirm that, to the best of my knowledge, there are no legal restrictions on the publication and distribution of the information I am submitting to this Call for Evidence.
- 3. I acknowledge that the SBTi may quote my submission in the summary report, with or without attribution to me and/or my organization(s).

The SBTi is not responsible for certifying that the information received through this process adheres to the terms above beyond obtaining the permissions above. Furthermore, the SBTi is not responsible for any errors or omissions, or for the results obtained from the use of this information. All information received through this Call for Evidence is provided for use "as is", with no guarantee of completeness, accuracy, timeliness or usefulness of the results obtained from the use of this information.

# **Contact Information**

For inquiries please contact us via <u>info@sciencebasedtargets.org</u>. Kindly use "Call for Evidence Inquiry" in the email subject.









# Annex A: Online submission form content

About the submitter (provide once per survey response)

Your name: \_\_\_\_\_

Your email address (not published):

Organizational affiliation:

Type of organization: \_\_\_\_\_

Provide a brief description of the organization(s) and your individual role within that organization (if this submission is associated with an organization) and/or provide a brief description of your individual background (if this submission is not associated with an organization):

Indicate how many pieces of evidence you are submitting (you may provide up to five times per survey response) \_\_\_\_\_

Submitting evidence

Title your evidence submission:

Identify the types of attribute certificate to which your evidence applies. (Select all that apply)

What type of evidence is this? (See types of acceptable evidence above; select one)

Disclose any conflict of interest, e.g., whether the research was supported by a non-public funding source: \_\_\_\_\_

Upload a cover letter (optional). You can use this to explain how the evidence responds to the research questions, describe the kind of position the evidence supports, and provide any additional context.

Upload the evidence as a PDF, DOC, DOCX, PNG, JPG or JPEG file; or send the evidence as an attachment to callforevidence@sciencebasedtargets.org.

Is the evidence relevant to the research questions?

- 1. What evidence exists about the effectiveness or ineffectiveness of environmental attribute certificates in delivering measurable emission reductions?
- 2. What evidence supports or opposes a causal link between specific operating conditions (geographies, regulatory schemes, presence or absence of tracking mechanisms or registries, etc.) and the effectiveness of environmental attribute certificates to deliver corporate emission reductions? Which conditions?
- 3. What regulatory safeguards and market infrastructure, if any, would need to be put in place for environmental attribute certificates to be effective and sustainable?













- 4. What evidence supports or opposes the ability of environmental attribute certificates to accurately reflect and quantify emission reductions in the context of corporate climate abatement targets?
- 5. What evidence exists that uptake of attribute certificates leads to or hinders the transformation needed to reach climate stabilization?
- 6. What specific evidence-based claims can and cannot be made when employing environmental attribute certificates to corporate decarbonization?
- 7. Is there evidence that supports or undermines that the market value of this type of instrument is commensurate with the abatement costs of the underlying activity?
- 8. Is there evidence that shows that the use of these instruments (i.e. procurement of the attribute certificate) could contribute to scale-up of climate finance compared to alternative interventions? Or could it result in climate finance dilution?

For each of the above questions, please indicate the following:

Question #	The evidence is relevant to this research question	What position does this piece of evidence support regarding this question?	Please explain (1000 characters). If you need more space, elaborate in the cover letter.
Notes	Select one	Select one. Only appears if previous question is "Relevant" or "Not sure"	200 word open text field. Only appears if previous question is checked
1	Relevant Irrelevant Not sure	Effectiveness Ineffectiveness Not sure/Other	Your response
2	Relevant Irrelevant Not sure	Supports Opposes Not sure/Other	Your response
3	Relevant Irrelevant Not sure	Regulatory safeguards and/or market infrastructure needed No safeguards or infrastructure needed Not sure/Other	Your response
4	Relevant Irrelevant Not sure	Supports Opposes Not sure/Other	Your response
5	Relevant Irrelevant Not sure	Leads to transformation Hinders transformation Not sure/Other	Your response













6	Relevant Irrelevant Not sure	N/A	Your response
7	Relevant Irrelevant Not sure	Supports Undermines Not sure/Other	Your response
8	Relevant Irrelevant Not sure	Scale-up of climate finance Climate finance dilution Not sure/Other	Your response

#### Permissions and acknowledgements

For each of the following, please provide a response:

- 1. May we contact you to request clarification about your submission?
- 2. I confirm that, to the best of my knowledge, the information I am submitting to this Call for Evidence is true and accurate; or that any inaccuracies or errors have been identified.
- 3. I confirm that, to the best of my knowledge, there are no legal restrictions on the publication and distribution of the information I am submitting to this Call for Evidence.
- 4. I acknowledge that the SBTi may quote my submission in the summary report, with or without attribution to me and/or my organization(s).

Click "done to finalize submission













# Annex B: List of stakeholder categories

Academic and Research Institutions	Researchers, scholars, and educational institutions providing data, studies, and expert opinions.	
Businesses and Corporations	Companies that are impacted by the subject of this Call for Evidence, providing insights from an economic and business standpoint.	
Community Groups	Local organizations, neighborhood associations, or advocacy groups representing specific communities.	
Consumer Advocacy Groups	Organizations advocating for consumer rights and interests.	
Environmental and Conservation Groups	Organizations concerned with environmental issues, conservation, climate, and sustainability.	
Ethnic, Cultural, and Religious Groups	Organizations representing specific cultural, religious, or ethnic communities.	
Individual Experts and Professionals	Individuals with specialized knowledge and expertise relevant to the Call for Evidence.	
Government Agencies	Other governmental bodies or agencies that may have an interest or expertise in the topic.	
Government Officials and Politicians	Representatives at various levels of government providing their constituents' viewpoints.	
Individual Citizens	General public members who provide their personal opinions and experiences.	
Industry Associations	Industry and trade associations interested in the subject of this Call for Evidence, offering insights from an economic standpoint.	
Investors and Other Financial Institutions	Individuals or groups with financial interests in the subject matter, offering insights into investment implications.	
Media and Journalists	Individuals or organizations that report on the subject matter, offering public sentiment or expert analysis.	
Non-Environmental Non-Governmental Organizations (NGOs)	Non-profit organizations focused on various issues such as human rights, education, economic development, etc.	
Professional Associations	Organizations representing professionals in specific industries (e.g., engineers, architects, lawyers).	
Trade Unions and Labor Groups	Organizations representing workers' interests, especially relevant for topics related to labor and employment.	
Youth and Student Groups	Organizations or individuals representing young people's perspectives and concerns.	









# Annex C: SBTi Research Ethics Guidelines

These guidelines are applicable to all SBTi commissioned studies or Calls for Evidence.

The objective of these guidelines are:

1. To ensure that researchers and those who submit information on the Calls for Evidence adhere to high ethical standards in their endeavors;

2. To ensure that the participants in research by SBTi commissioned studies or Calls for Evidence are treated fairly and ethically,

3. To provide clear guidance on handling sensitive information responsibly and in accordance with privacy laws and regulations.

4. To demonstrate to all concerned or interested parties that SBTi aspires to live up to the highest ethical standards in research and/or Call for Evidence.

### **Principles**

The following principles form the core of these guidelines and should be adhered to in SBTi research or Calls for Evidence:

# Honesty and integrity:

We expect all contributors to this Call for Evidence to provide accurate, truthful, and complete information as this is essential to ensure the credibility and reliability of the evidence collected. Upholding the highest standards of honesty and integrity is not only an ethical obligation but also a cornerstone of trust in the research and standard development process. Your commitment to these principles is vital in our pursuit of unbiased, fact-based insights that can inform sound decisions and solutions

# **Confidentiality and Privacy:**

All submitted information and evidence, while subject to public disclosure, will be treated with respect for your privacy in compliance with applicable privacy laws and regulations. We encourage contributors to consider anonymizing sensitive information when feasible to enhance privacy protection.

# Diversity, Equity, and Inclusion (DEI):

We are committed to fostering a diverse, equitable, and inclusive environment. We believe that the richness of diverse perspectives, backgrounds, and experiences is essential for achieving meaningful insights and impactful outcomes. We welcome and encourage contributions to this Call for Evidence from individuals and groups representing a wide spectrum of identities, including but not limited to race, ethnicity, gender, sexual orientation, disability, age, religion, nationality, and socioeconomic background.











We are dedicated to ensuring that the evidence-gathering process is free from discrimination or bias of any kind. All submissions will be evaluated solely on their merit and relevance to the Call for Evidence scope and objectives.

# **Data Protection:**

This statement outlines how we collect, handle, and safeguard the information you provide within this Call for Evidence.

- 1. We collect data and evidence you submit as part of this process. This may include personal information, contact details, documents, and other materials relevant to the evidence you provide.
- 2. The data collected is used exclusively for the purpose of this Call for Evidence, including the evaluation and analysis of submissions.
- 3. Your personal data will be treated with the utmost confidentiality. We will not disclose your personal information without your explicit consent.
- 4. We employ industry-standard security measures to protect your data against unauthorized access, disclosure, alteration, or destruction. We are committed to maintaining the security and integrity of all data collected.
- 5. We will retain your data only for as long as necessary to fulfill the purposes outlined in this Call for Evidence, unless a longer retention period is necessary for legitimate research purposes.

By participating in this Call for Evidence, you acknowledge that you have read and understood this Data Protection Statement and consent to the collection and processing of your data in accordance with the outlined principles. Your data will be handled with care and in compliance with applicable data protection laws and regulations.

# **Compliance with Ethical Standards:**

To ensure objectivity and transparency in research and to ensure that accepted principles of ethical and professional conduct have been followed, contributors shall include information regarding potential conflicts of interest (financial or non-financial), Disclosure of interests provides a complete and transparent process and helps reviewers form their own judgments of potential bias. Note that this does not imply that a financial relationship with an organization that sponsored or conducted the research or a compensation received for consultancy work is inappropriate. Further information are detailed in the Competing Interest Guidelines (Annex D)

# Feedback and Recommendations:

We encourage participants to provide feedback on any aspect of the evidence-gathering process. Your feedback helps us continually improve and enhance the quality and effectiveness of our initiatives. Whether you have suggestions for process improvements, comments on the handling of evidence, or general feedback, your insights are valuable to us.





To provide feedback, please email <u>callforevidence@sciencebasedtargets.org</u>.

# Annex D: SBTi Competing Interest Guidelines

Disclosure of interests provides a complete and transparent process and helps reviewers and readers to make their own judgments of potential bias.

For the purposes of these guidelines, competing interests are defined as financial and non-financial interests that could directly undermine, or be perceived to undermine the objectivity, integrity and value of the evidence submitted. Note that this does not imply that a relationship with an organization that sponsored or conducted the research or a compensation received for consultancy work is inappropriate.

Interests that should be considered and disclosed include, but are not limited to:

Financial interests such as:

- **Funding:** research grants from funding agencies or research support by organizations that might gain or lose financially through the publication of this work.
- **Employment:** Recent (while engaged in the research project), present or anticipated employment by any organization that may gain or lose financially through publication of this work. This includes multiple affiliations (if applicable).
- **Personal financial interests:** Stock or shares in companies that may gain or lose financially through publication of this work. consultation fees or other forms of remuneration (including reimbursements for attending symposia) from organizations that may gain or lose financially; patents or patent applications (awarded or pending) filed by the authors or their institutions whose value may be affected by publication of this work.

**Non-financial interests** can take different forms, including personal or professional relations with organizations and individuals. We encourage authors to declare any unpaid roles or relationships that could impart bias on the submission. Examples of non-financial competing interests include, but are not limited to:

- Unpaid membership in a government or non-governmental organization
- Unpaid membership in an advocacy or lobbying organization
- Unpaid advisory position in a commercial organization
- Writing or consulting for an educational company
- Acting as an expert witness
- Mentoring relationship









### Examples of statements to be used in the competing interest declaration

Please see the various examples of wording below and revise/customize the sample statements according to your own needs.

### 1. Examples of statements to be used when there are interests to declare:

**Financial interests:** Author xx has received research support from Company A and/or has received a speaker honorarium from Company A and/or owns stock in Company A. and/or is a consultant to company A and/or receives a salary from association X where s/he is the [indicate position held].

**Non-Financial interests:** Author xx is an unpaid member of committee Z and/or is on the board of directors of Y and receives no compensation as a member of the board of directors and/or has served on advisory boards for Company M, Company N and Company O.

# 2. Examples of statements to be used when authors have nothing to declare:

All authors certify that they have no affiliations with or involvement in any organization or entity with any financial interest or non-financial interest in the subject matter or materials discussed in this work.

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