

Momentum AT RISK



Evaluating Proposed Amendments to the
GHG Protocol's Scope 2 Requirements

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Executive Summary

The GHG Protocol’s Scope 2 emissions guidance has been foundational in standardizing and accelerating meaningful corporate action to reduce greenhouse gas (GHG) emissions.

The Protocol recently proposed amendments to the guidance to help drive further emissions reductions. However, if they are not implemented appropriately, these reforms could stall momentum for corporate action on emissions reductions.

To understand the practical implications of the proposed amendments, Business Renewables Centre-Canada (BRC-Canada) carried out original analysis and found that PPAs, one of the most crucial catalysts for renewable development, could double in price, leaving the majority of Canadian corporate emissions without a direct procurement option. Furthermore, implementing these changes before ensuring adequate digital and physical infrastructure is in place in the region could threaten the integrity of the GHG accounting system.

These proposed changes must be phased in thoughtfully and cautiously. While increasing accuracy to improve data integrity in Scope 2 accounting

could affirm momentum to deep decarbonization of electricity grids in mature procurement markets like the United States and Europe, it could also pose a barrier to renewable energy buyers' ability to meet their climate targets in other jurisdictions. Such a barrier could bring voluntary procurement of clean electricity to a halt, hamstringing renewable energy development, and could result in the unintended consequence of increasing emissions. The GHG Protocol must balance stringency with implementation pragmatism.

With the increase in stringency, particularly in markets still in the early stages of corporate procurement, companies could shift from PPAs toward unbundled RECs. This could reduce system decarbonization, as unbundled RECs allow companies to claim renewable electricity attributes without directly supporting the addition of new renewable generation or driving long-term investment in clean energy.

At a Glance

Issue	Current	Proposed	Impact
Temporal Matching	Annual	Hourly	Clean power must be generated in the same hour it is used
Geographic Matching	National	Same province or territory	Fewer regions where PPAs are feasible and companies that can meet their GHG targets
PPA Deal Structure	Simple	Hybrid and complex	Buyers could be discouraged from pursuing deals due to additional costs, complexity, and data uncertainty. Cost of the PPA could double.
Data Requirements	Few	Hourly data and verification	Data availability and reliability issues in Canada



Introduction

Driven by climate commitments, stakeholder expectations, and regulatory pressures, corporations and renewable energy buyers have increasingly prioritized reducing their GHG emissions using the GHG Protocol's guidance.

To address their Scope 2 emissions, buyers usually procure renewable energy attributes in line with this guidance, thereby credibly accounting for purchased clean electricity. As a result, corporate procurement has helped accelerate the deployment of renewable energy projects in Canada and globally, supporting a substantial share of projects built to date.

The GHG Protocol is now proposing amendments to this guidance, shifting from annual to hourly

matching of renewable energy attributes and introducing stricter geographic matching requirements.

While the proposed changes aim to reduce emissions further and improve data integrity, BRC-Canada's original analysis, followed by engagement with its community participants, highlights that these changes could introduce challenges, drastically slowing or disrupting corporate procurement.

The role of the GHG Protocol and RECs

Since 2001, the GHG Protocol – a non-profit partnership between the World Resources Institute (WRI) and the World Business Council for Sustainable Development (WBCSD) – has provided guidance to renewable energy buyers on how to quantify – and thus reduce – their direct greenhouse gas (GHG) emissions impacts.¹ In 2015, the GHG Protocol published guidance on emissions from energy or electricity used but produced offsite, known as Scope 2 emissions.²

While buyers have been able to reduce their Scope 2 emissions through efficiency improvements, the main way they have addressed these emissions has been by the procurement of renewable energy certificates

(RECs) as standalone certificates or, more directly, through a virtual power purchase agreement (vPPA).

RECs are an acknowledgment of a unit of electricity (usually a megawatt-hour, or MWh) produced by a clean energy source, such as wind or solar power plant. They are usually administered by a non-profit organization like the Western Electricity Coordinating Council (WECC) for Alberta generators and CleanCounts for Ontario power producers, which track the unique creation, ownership, and retirement of each certificate. In other cases, buyers have also directly contracted for new zero-emissions electricity to be built on-site or otherwise directly connected to their facilities.

1 The Greenhouse Gas Protocol, *A Corporate Accounting and Reporting Standard* REVISED EDITION (2015). <https://ghgprotocol.org/corporate-standard>

2 The Greenhouse Gas Protocol, *Scope 2 Guidance* REVISED EDITION (2015). <https://ghgprotocol.org/scope-2-guidance>

How This Drives Renewable Energy Development

By recognizing the environmental attributes of clean electricity produced by renewable projects, whether through RECs or carbon credits, renewable energy buyers have been able to credibly reduce their Scope 2 emissions, while also making it more economic to build and operate renewable energy projects. This accounting framework turned voluntary corporate climate goals into bankable revenue streams for renewable developers.

This mechanism is especially important because PPAs often serve as an important financing anchor for developing new projects. For example, in 2024, Europe added around **70 GW** of new renewable energy capacity, alongside **12.9 GW** of corporate PPAs executed the same year. PPAs do not translate into immediate capacity additions within the same year, but they represent a large share of future projects. At 18 per cent of the annual build-out volume, contracted capacity highlights the growing and important role of PPAs in enabling energy projects across Europe.

In Canada, 63 percent of the deals tracked in Business Renewables Centre-Canada's (BRC-Canada or BRC-C) Deal Tracker come from corporate demand. In the United States, corporate PPAs accounted for around **70 per cent** of renewable energy capacity additions in 2022, with cumulative contracted capacity reaching a record **100 GW** by 2024. This is not just happening in North America and Europe; PPAs are increasingly being adopted across Asia-Pacific, Africa and South America. Globally, contracted capacity has increased year over year, with 2024 seeing a **35 per cent** increase from the previous year, representing around 69 GW of new capacity, which accounts for almost **12 per cent** of the total renewable capacity added in 2024.

The standardization of Scope 2 emissions through the GHG Protocol's Scope 2 guide has been central to corporate PPAs that underpin global renewable energy development by providing a consistent market signal linking corporate climate demand to the deployment of renewable energy projects.



Proposed changes

The current guidance enabling this process allows renewable energy buyers to meet their Scope 2 emissions reduction targets by matching RECs or carbon credits to their annual Scope 2 electricity consumption, without additional geographic matching requirements.

However, in 2023, the GHG Protocol began considering revising the Scope 2 guidance and in 2025, released the proposed revisions that would require buyers to:

- **Hourly Matching:** Match their electricity consumption using contractual instruments (like PPAs) on an hourly basis, using the highest-precision data available
- **Geographic Matching:** Only source contractual instruments (such as PPAs) from the same deliverable market boundary as where the company's electricity use is located.

Once approved, the revised guidance is expected to be published in late 2027, with implementation phased in over multiple years. Proponents of the revision argue that these changes, along with others, increase the accuracy and integrity of emissions reporting, thereby better aligning electricity with actual renewable energy production. BRC-Canada supports this ambition and recognizes that, in an ideal scenario, the proposed changes could deliver both impact and increased accuracy.

However, implementing them too rapidly risks producing the opposite outcome. In jurisdictions like Canada, data availability and market infrastructure are limited, making it difficult to match emissions on an hourly basis within strict geographic boundaries. As a result, rather than encourage, these revisions are likely to directly hinder the development of renewable projects in Canada for years to come.



Methodology

Beginning with a representative facility that can meet its annual electricity demand with a 100 MW solar PPA, BRC-Canada added a 50 MW wind PPA, 5 MW of demand response, and then calculated the additional energy storage that would be needed to reach 100% hourly matching. A solar project was selected as the baseline for the analysis as BRC market tracking has shown a shift in PPA deals towards solar over wind.

Each additional PPA increases the number of hours of electricity demand matched by generation, but at costs to the buyer that grow increasingly as matching approaches 100% hourly. We repeated this analysis across 19 industries overall – though not including midstream or downstream oil and gas (e.g., compression, upgrading, or refining). Because Alberta is the main region in Canada where companies can

currently enter into direct PPAs with renewable developers, it was chosen as the test case to analyze the impact on the cost of PPAs, generation profiles, and load profiles. The overall cost of these PPAs, inclusive of project development, financing, carbon credits and other fees, were based on publicly available data for Alberta and other regions. Note that because Alberta has amongst the best wind and solar resources in Canada and thus the lowest costs, prices could be higher in other regions. To account for fluctuations in pricing across regions and time, our analysis focuses on the relative change in total PPA cost to the corporate buyer from moving from the baseline to 24/7 matching.

A detailed methodology is available on BRC-Canada's [website](#).



Analysis

Not many public impact assessments have been conducted to evaluate the real-world implications of the GHG Protocol's proposed revisions to the Scope 2 guidance.

As detailed above, the Scope 2 guidance plays a key role in enabling corporate emission reductions and, by extension, in driving renewable energy development. It is therefore critical to understand how these revisions would impact corporate procurement in both major markets, such as the United States and Europe, and in less mature markets, such as Canada, where corporate procurement is a key driver of renewable energy growth.

To address this gap, BRC-Canada conducted an original analysis to assess the overall impact to

the cost of PPAs for clean energy buyers in Canada if they matched their electricity consumption to generation on an hourly basis instead of an annual basis. Our analysis was guided by two main questions:

- Using annual consumption data, how close are organizations currently to matching their hourly consumption?
- What is the impact to the overall cost of a PPA for buyers when moving from annual to hourly matching?



Top takeaways

- Annual matching already delivers 40 per cent of the 24/7 matching benefits over the course of a year.
- Hourly matching would substantially increase procurement costs, often doubling the total cost of a PPA to the corporate buyer to acquire additional generation and storage capacity to meet those requirements
 - Moving from annual matching to 100 per cent hourly matching raises PPA costs by a range of 98-139 per cent across the 19 industrial sectors in Alberta
 - Cost impacts are not linear. Coverage up to 70 per cent increases PPA costs by 40 per cent, but escalates significantly beyond 70 per cent coverage
- Generation and demand data required for hourly matching are not available across all jurisdictions, forcing companies to rely on proxy data that ultimately weakens accuracy

Hourly matching

What is hourly matching?

Quality Criterion 4 in the proposed GHG Protocol Scope 2 revision requires renewable energy buyers to match their electricity use with contracted renewable generation (e.g., through PPAs) on an hourly basis.

Currently, renewable energy buyers can match their annual electricity use with total consumption over the year, balanced against total renewable generation. Under the proposed requirement, that approach would no longer be sufficient. Instead, buyers must ensure that their electricity consumption for each hour is matched with renewable electricity generated in that same hour. This was proposed because annual matching tends to overstate emissions reductions and hourly matching more accurately reflects physical grid operations. Under ideal market conditions, hourly matching can enhance the credibility of emissions reduction claims.

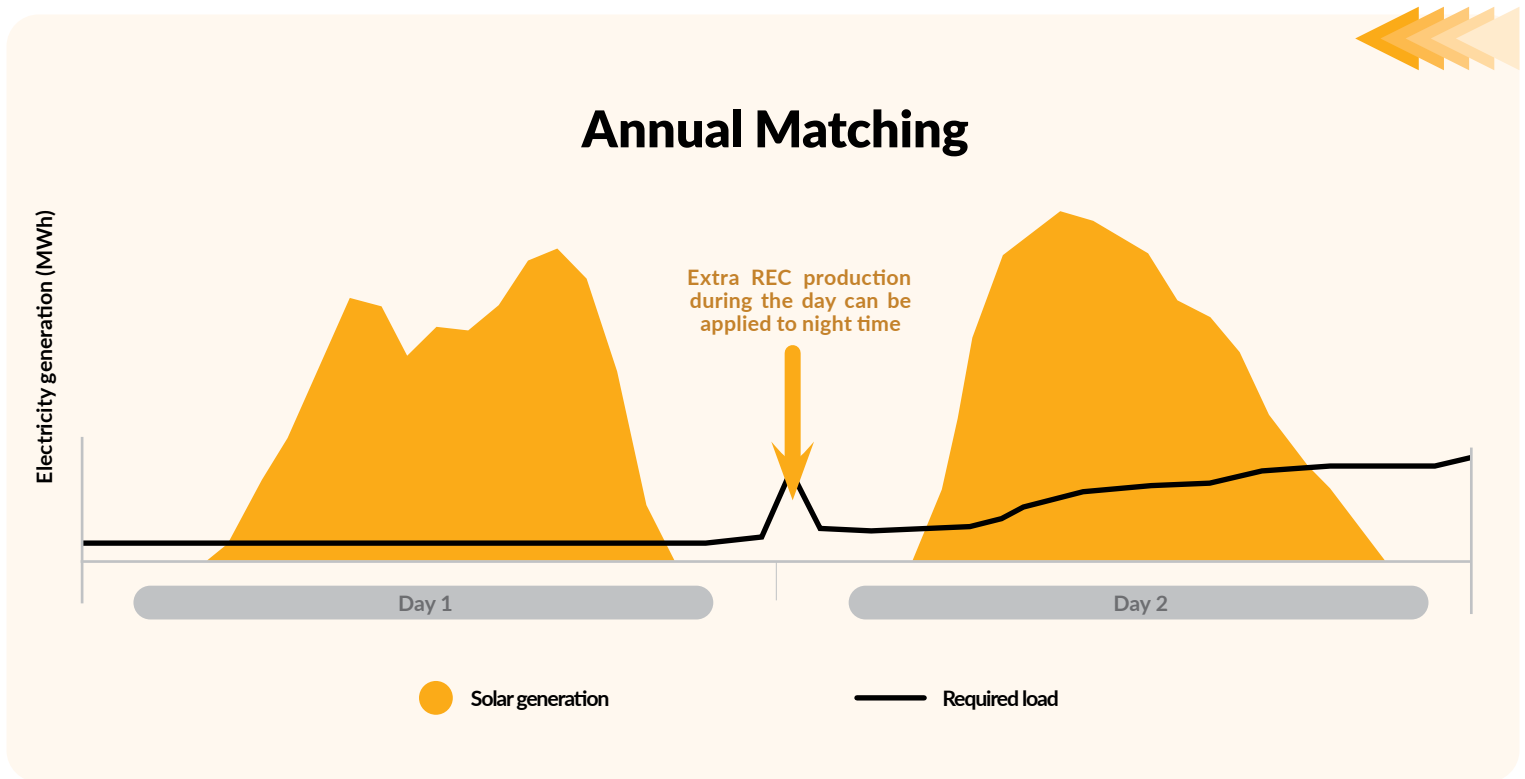


Figure 1 .

Example of annual matching of electricity generation with consumption over two summer days

Figure 1 above shows the solar generation and electricity demand of a representative company over two days in June 2025. The black solid line represents the company's hourly load, and the yellow-shaded area shows the solar generation from the company's PPA project. Solar output is highest during daylight hours, often exceeding this company's actual demand, and no generation occurs overnight. Under annual matching, hours when the company's load is not met overnight are reconciled by the excess output produced during the day. This allows the company to claim its annual demand

using the project's annual generation under the PPA.

Under the hourly matching requirement, it would be insufficient for buyers to rely only on a single-technology PPA to cover all hours of consumption. Buyers would need to consider opting for hybrid PPAs that combine multiple generation sources – and likely with storage options – to claim renewable energy across all hours of the year.



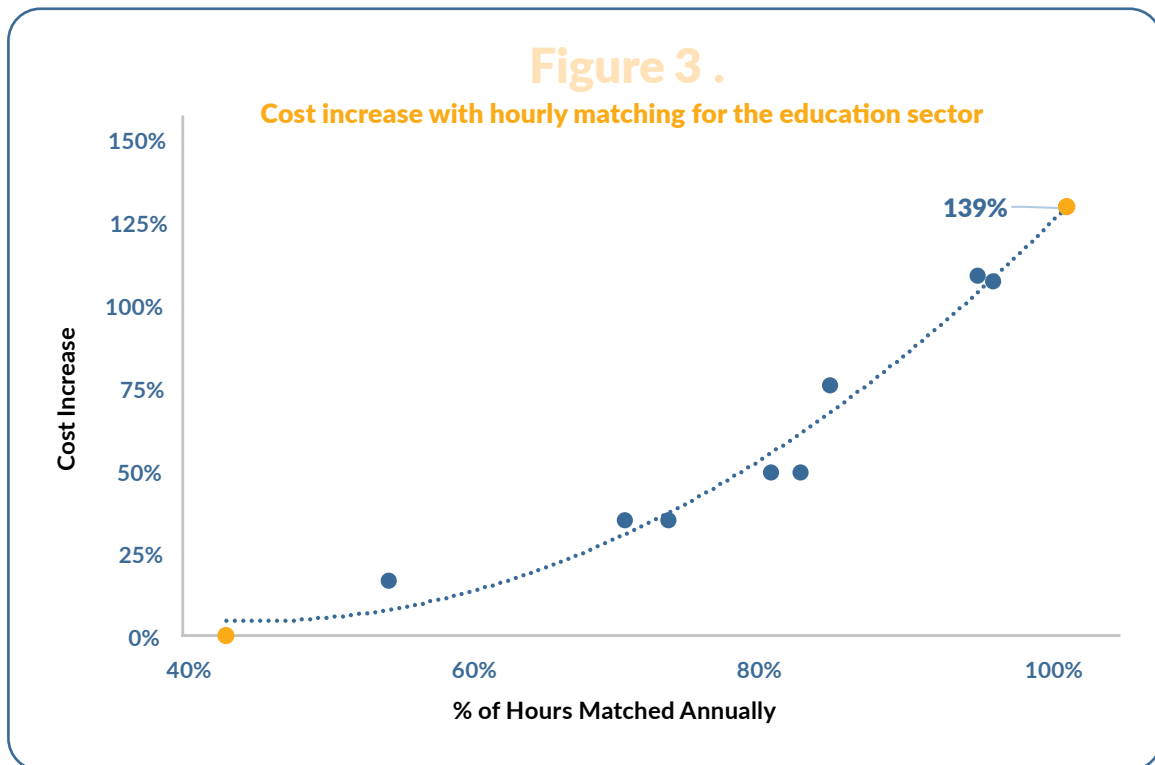
What is the cost impact of Hourly Matching?

As shown above, hourly matching requires the company's electricity consumption to be matched with renewable generation under a PPA.

A standalone solar PPA covers approximately 43 per cent of the company's load under the hourly matching requirement. Adding wind to address much of the nighttime demand increases load coverage to 70 per cent. However, this addition also raises the cost of a PPA by an average of 40 per cent for the corporate offtaker. As we continue to layer in more resources to cover the load, such as storage and demand response options for cost optimization,

coverage improves to up to 90 per cent, while costs increase by over 73 per cent. Achieving 100 per cent coverage would result in a doubling of the cost, from 98 to 139 per cent depending on the sector.

Using the education sector as an example, **Figure 3** below shows that the relationship between hourly matching requirements and the cost of PPAs is non-linear. Increasing hourly matching to achieve 50-70 per cent coverage raises PPA costs by around 40 per cent and increasing matching requirements beyond 70 per cent lead to disproportionately higher procurement costs.



% of Hours Matched	Impact to the Cost
43% (Status Quo)	1
70%	1.4x
90%	1.7x
100%	2x

Table 1 .

Cost impact of achieving higher matching requirements

Table 1 above and **Figure 4** below show the same relationship discussed in **Figure 3** in a simplified format for all 19 sectors. It summarizes the estimated increase in PPA procurement costs associated with stricter hourly matching requirements. At current the procurement cost (status quo), PPAs provide around 43 per cent of hourly coverage. Increasing coverage

to 70 per cent would raise costs by roughly 1.4 times relative to current levels, and achieving above 90 per cent coverage could nearly double current costs.

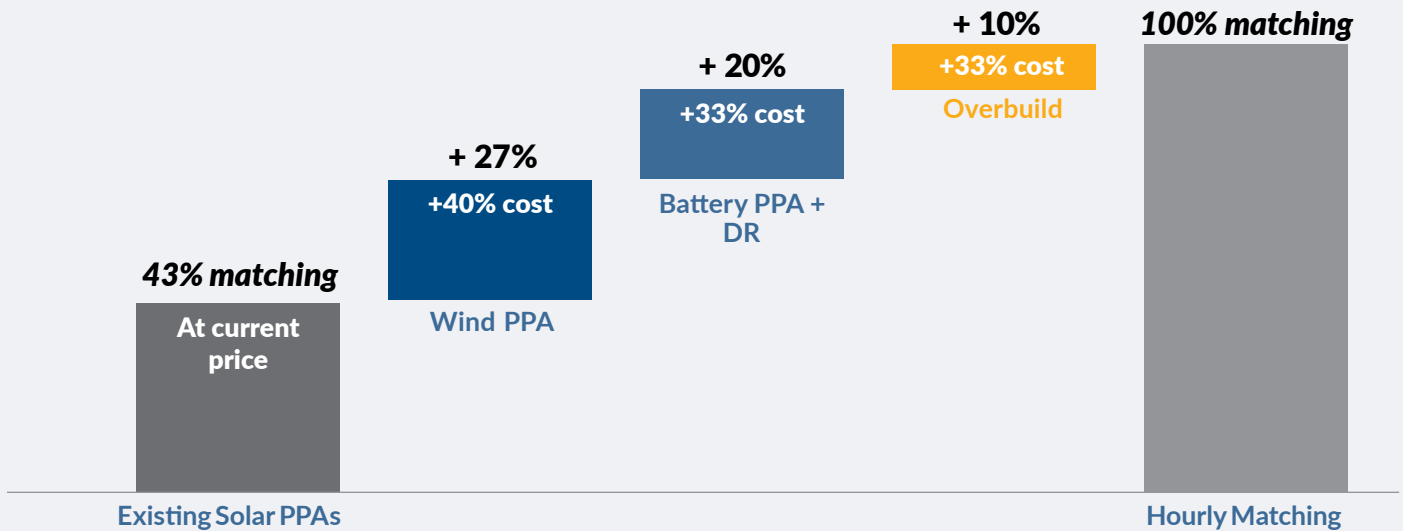
Across the 19 industry profiles analyzed, the impact to the cost of PPAs could vary depending on the industry's baseline load profiles and demand. For example, a standalone solar PPA for companies in manufacturing and construction would, under the hourly-matching requirement, cover only 42-44 per cent of their electricity load. To achieve 100 per cent hourly matching, these industries could experience costs exceeding 105 per cent of current costs.

Other industries, such as livestock farming or the trades sector, would experience a slightly lower but still significant impact, with cost increases of 99-100 per cent.

Figure 4 .

Cost of PPA increases as more technologies are needed to cover more hourly matching

Achieving 100% hourly matching using hybrid PPAs and its impact on PPA price



Infrastructure Challenges

BRC-Canada engaged with its community of renewable energy buyers and developers and based on the input we received, access to hourly energy consumption data remains a major challenge. This issue affects public and private entities alike, across both large and small organizations. Renewable energy buyers often lack access to the necessary data because utilities or third-party providers control it and it is not readily available in many jurisdictions.

Of Canada's 12 regional electricity system operators (10 provinces and two territories), only six have hourly generation data available for wind and solar products.³ Since electricity systems are governed regionally, there is no consistent data standard. Consequently, the required data is not published at consistent intervals, in the same formats, or using the same methodologies. For example, different regions handle daylight savings time adjustments differently, using local time.

On the demand side for corporate buyers, not all facilities have smart meters that can log hourly electricity consumption; the GHG Protocol has proposed using sectoral load profiles as an approximation of real data.

For multinational organizations, these challenges are amplified by uneven data availability across regions, forcing reliance on proxy data.

Both limitations reduce the credibility of hourly matching. Without accessible and auditable data, corporate reporting would become a weaker reflection of realities on the ground. The proposed framework, intended to improve accuracy, instead risks forcing many buyers to rely on approximations.

Furthermore, to address these feasibility issues that may arise with requiring hourly matching, the working group recommended using load profiles to approximate hourly data from monthly or annual data. Load profiles are planning tools for system operators and grid planners, not empirical measurements and cannot be used as a substitute for real data. Using such estimates and proxy data will ultimately reduce, rather than improve, accuracy. BRC-Canada is concerned that requiring higher-resolution proxy data from organizations in the absence of actual hourly data will result in a weaker reflection of the actual emissions and energy realities.

³ Newfoundland and Labrador, Nova Scotia, Quebec, Ontario, Saskatchewan, Alberta. Yukon maintains hourly generation data for hydroelectricity. See <https://energy-information.canada.ca/en/resources/high-frequency-electricity-data>

Geographic

Given the market structure in many Canadian jurisdictions, corporate renewable procurement can currently be facilitated only in Alberta.

In most of the other regions, market structures and regulatory frameworks do not provide the necessary conditions or incentives to support corporate procurement. Therefore, renewable energy buyers operating across Canada rely on PPAs in Alberta to address their Scope 2 emissions.

A BRC-Canada analysis from last year found that the top 100 Canadian corporations would require 7.7 GW of renewable energy capacity to meet their Scope 2 targets, out of which only 19 per cent of that demand comes from corporations with operations in Alberta.

Under the proposed revisions, introducing stringent geographic matching requirements could suppress PPA activity in Canada and, in turn, renewable development. Corporations in Canada may not have viable options for facilitating PPAs outside Alberta, given the existing market structures. Reduced corporate procurement activity could further weaken incentives for governments in other jurisdictions that may have been considering opening their electricity markets to corporate procurement.



Top Takeaway

- Geographic matching is only possible in Alberta, and to a small extent, Nova Scotia and Ontario, because of current regulatory structures. This change would limit the number of renewable energy buyers and their facilities that can use PPAs to cover Scope 2 emissions.

What is geographic matching?

Under the market-based method, the GHG Protocol requires renewable energy buyers to source contractual instruments (like vPPAs) from the same deliverable market boundary as their electricity consumption. They can source from outside the market boundary only if the contract clearly states that the electricity can be delivered to the point of consumption. Under the proposed guidance, the deliverable market boundary in Canada is defined at the provincial or territorial level.

Currently, the deliverable market boundary for contracted vPPAs is usually applied at the national level. Canada has limited provincial markets where long-term PPAs are feasible, with Alberta being the only mature option, making the national level boundary a workable approach. Buyer organizations located in any province have been able to procure vPPAs in Alberta to meet their Scope 2 emissions target.



Concerns

Defining geographic boundaries at provincial borders limits compliance options and Canadian efforts to intertie between provinces, which, in addition to supporting grid reliability and security, are beneficial for integrating more renewable projects. If the deliverable market boundaries change to provincial or territorial levels, only buyers in Alberta – and, to a very limited extent, Nova Scotia and Ontario – would be able to meet their Scope 2 emissions targets. Alberta is currently the only mature market for vPPA facilitation, and the latter provinces are the only ones to have taken steps to open their markets to corporate procurement. However, opportunities remain limited and are still developing slowly.

The 2025 BRC-Canada report “From Pledge to

Power”⁴ found that the top 100 Canadian companies will require 7.7GW of renewable capacity to achieve their Scope 2 targets by 2040, and only 1.4 GW (19 per cent) of that demand is in jurisdictions with viable procurement options (i.e., Alberta). This reflects demand only from the top 100 companies and does not account for the broader market. Relatedly, there are several mechanisms through which every province could facilitate more PPA development.⁵

Implementing the GHG Protocol’s proposed Quality 5 Criteria would severely restrict access to vPPAs. This would push organizations toward unbundled RECs, reducing additionality and the organizations’ climate impact and could even impact renewable energy deployment in Canada.

⁴ BRC-Canada, *From Pledge to Power* (2025). <https://businessrenewables.ca/resource/pledge-power>

⁵ BRC-C, *Powering Corporate Choice* (2025). <https://businessrenewables.ca/resource/powering-corporate-choice>



The GHG Protocol opened a public consultation on the Scope 2 accounting framework between October 2025 and January 2026, to which BRC-Canada provided detailed feedback and recommendations.

The feedback was informed by BRC-Canada's research, analysis and engagements with our broader community and reflects the concerns and issues outlined above. BRC-Canada agrees that Scope 2 reform can be beneficial – but only if it preserves investment signals, protects credibility, and reflects real-world electricity systems.

BRC-Canada recommends

1 **Protect Legacy Contracts**

It is critical to include a legacy clause in the framework to protect existing contracts, reduce policy risk, and support continued investment in renewables.

2 **Phased Implementation of Hourly Matching**

As proposed by the Science Based Targets initiative (SBTi), 100 per cent 24/7 matching needs to be phased in, especially in Canada. There is not enough digital and institutional infrastructure to support credible verification of 24/7 matching yet, which threatens the credibility of hourly matching becoming a requirement. Moreover, in reference to BRC-Canada's analysis, moving to hourly matching will more than double PPA costs.

3 **Region Appropriate Geographic Matching**

Allow the deliverable market boundary for Canada to be at the national level, matching market realities and avoiding limiting procurement and renewable growth.

1 Protect Legacy Contracts

The GHG Protocol is considering a transition provision that would allow organizations to continue using existing Scope 2 contractual instruments for market-based reporting, even if they do not meet the proposed hourly matching or deliverability requirements.

BRC-Canada strongly supports the inclusion of a legacy clause. Without a legacy clause, future investment in long-term contracts would be undermined, and project

proponents would face increased policy uncertainty. Organizations could be left holding long-term contracts that no longer qualify for emissions reduction claims, despite having been executed in good faith. This creates material risk for the long-term contracts that underpin renewable energy project development across Alberta.

2 Phased Implementation of Hourly Matching

BRC-Canada recommends a phased implementation of the proposed revision of the Quality 4 Criteria, hourly matching.

Hourly matching represents a significant administrative burden for many organizations, particularly for small and medium-sized organizations. To address this issue, BRC-Canada recommended slowly phasing in new requirements over time toward more granular accounting. This approach would ensure that organizations are not penalized for structural constraints outside their control today.

Finally, to avoid contradictions and inconsistencies, the revisions to the GHG Protocol Scope 2 Guidance should align with the phased introduction of hourly matching in the latest SBTi Corporate Net Zero Standard. For a realistic balance between ambition and feasibility, this involves adopting a gradual ramp-up toward hourly matching of at least 50 per cent until 2030 and 90 per cent from 2035.

Furthermore, annual matching already achieves around 40 per cent of the same outcomes as 24/7 matching, meaning, the industry is already on its way to achieving better renewable matching. Similarly, while the costs of increasing the number of hours that need to be matched rise sharply as the requirement exceeds 80 per cent. A phased implementation allows more time – and, in fact, provides market certainty – for renewable energy supply chains to strengthen further and for costs to continue to fall.

A phased implementation will also allow time for improvements in data availability, carbon registry readiness, and overall market maturity. As a result, the pace of implementation should be informed not only by target dates but also by demonstrated readiness of the supporting market infrastructure

3 Region Appropriate Geographic Matching

As discussed above, corporate procurement is not feasible across all regions in the country, making the Quality 5 Criteria in the GHG Protocol Scope 2 revision particularly challenging to implement in Canada.

We note that the proposed changes could significantly reduce renewable energy investment in the near term, and there is no guarantee that market opportunities will emerge. This is especially concerning given the substantial demand from only the top 100 Canadian companies across the country's regions. Requiring

a deliverable market boundary at the provincial or territorial level will greatly limit renewable energy buyers' ability to meet their targets in Canada and the country's renewable energy opportunities.

For these reasons, BRC-Canada urges the GHG Protocol to consider the implications of Quality Criteria 5 for smaller countries and less developed markets, specifically requesting that the deliverable market boundary for Canada be defined at the national level.



Conclusion

Corporate PPAs often serve as the primary financing anchor for new renewable energy projects and are used globally to drive renewable deployment. The GHG Protocol's Scope 2 guidance underpins the mechanism for corporate PPAs and has helped numerous buyers reduce their Scope 2 emissions by facilitating the development of new renewable energy projects.

Last year, the GHG Protocol released proposed revisions to the market- and location-based method in the Scope 2 guidance. The two main proposed changes include:

1. The shift from annual to hourly electricity consumption matching
2. Stricter geographic matching, which would lead to provincial or territorial matching in Canada

BRC-Canada supports GHG protocol's intention to improve the integrity of Scope 2 accounting, however, based on our analysis of the proposed changes and their real-world impact in Canada, we believe there is a large gap between the ambition of the proposed revisions and current market realities.

Requiring hourly matching would more than double the cost of PPAs in the analyzed sectors, with costs especially rising beyond 80 per cent hourly coverage. Beyond cost impacts, most buyers have limited access to reliable hourly data, resulting in lower data quality than the intended increase in accuracy. Furthermore, hourly matching would require reliance on hybrid solar-and-wind PPAs with storage, a level of market infrastructure not currently in place in Canada.

At the same time, geographic matching at the provincial or territorial level would severely constrain procurement options in Canada, given that most of the country currently lacks a mature corporate procurement market to facilitate PPAs to the extent required to meet Canadian corporate renewable energy demand.

BRC-Canada notes that if these changes are implemented too quickly, they could severely impact PPAs in Canada and other jurisdictions with similar market constraints.

BRC-Canada recommends a phased approach to the hourly-matching requirement, one that aligns with infrastructure and market readiness. For example, reaching 50, 75 and 90 per cent by 2030, 2035 and 2040, respectively, as proposed by the Science Based Targets initiative. For geographic matching, BRC-Canada recommends keeping the deliverable market as it is currently, that is, at the national level. Moreover, it is also important to include legacy clauses in the proposed revision to protect existing contracts and investor confidence.

Overall, by adopting a gradual, market-specific approach, the GHG Protocol can preserve the integrity of corporate procurement while maintaining the investment signals needed to scale renewable energy deployment. The success would be reflected in sustained corporate procurement growth, strengthened accounting integrity over time, a phased transition toward hourly matching, limited disruption to existing investment signals, and continued renewable deployment momentum.

The GHG Protocol built the foundation for corporate climate action and the proposed revisions should strengthen it, not undermine it. Getting this revision right matters not just for Canada but for every market where corporate procurement is still in its early stages.

