

REGULATORY ASSISTANCE

Third-Party Verification Services

California, Oregon, and Washington



About California Assembly Bill 32

California's Global Warming Solutions Act of 2006 (Assembly Bill 32 or AB 32) sets forth an aggressive program to reduce greenhouse gases (GHGs) from nearly every sector of the state's economy, including manufacturing, electricity, transportation, agriculture, consumer products, and others. The primary objective of AB 32 is to implement emission reduction strategies and programs that reduce GHG emissions to 1990 levels by the year 2020 initially, with additional reductions by the year 2050.

About Oregon GHG Reporting Program

Starting in 2010, Oregon's Greenhouse Gas Reporting Program requires reporting of greenhouse gas emissions data and related information from major sources including large stationary sources and liquid fuel, natural gas, propane, and electricity suppliers. Data and information are reported, audited, and published annually.

About Washington Climate Commitment Act

The Climate Commitment Act (CCA) was passed by the Washington state legislature in 2021, which aimed to achieve Washington's GHG emission reduction goal of 95% reduction below 1990 levels by 2050. CCA introduced a cap-and-invest program, GHG inventory verification, expanded reporting requirements for certain industries, and promoted environmental justice. The cap-and-invest program allows the use of offset projects to achieve the GHG emission reduction goal.

Independent Verification Requirement for GHG Reporting Program

As part of AB 32, the California Air Resources Board (ARB) promulgated mandatory reporting regulations (MRR) in December 2007 that require entities to calculate and report their GHG emissions for specific industry sectors and for general stationary combustion sources with emissions greater than or equal to 10,000 metric tons (MT) of CO₂e per year. In addition, for those facilities with emissions that equal or exceed 25,000 MT-CO₂e per year, accredited third-party verification is required (and AB 32 cap-and-trade obligations apply).

In Oregon, entities with annual GHG emissions equal to or greater than 2,500 MT CO₂e are required to submit an annual GHG emissions report. In addition, facilities with annual GHG emissions equal to or greater than 25,000 MT CO₂e are required to have their annual emissions verified by a DEQ-approved verification body. All DEQ-approved verification bodies and lead verifiers also maintain ARB's accreditation. Additionally, all participants in Clean Fuels Program are required to report the volume and carbon intensity for the specified fuel type to demonstrate compliance with the clean fuel standards.

In Washington, entities with GHG emissions equal to or greater 10,000 MT CO₂e are required to submit emissions report. In addition, facilities with emissions equal or greater than 25,000 MT CO₂e, or have the compliance obligation under CCA are required to have their annual emissions verified by an Ecology-approved VB and verifiers. All Ecology-approved verifiers have ARB's accreditation.

Independent third-party verification improves data reliability and provides the necessary assurances that people doing business in these states are accurately calculating emissions and correctly meeting reporting requirements. The data collected by these programs is considerable and will continue to grow in breadth, depth, and importance.

Independent Verification Requirement for Offset Projects

Offset projects can be used to generate GHG offset credits, which represent a removal or reduction of GHGs by a measurable, quantifiable, and verifiable activity. All compliance offset projects must be developed according to approved compliance offset protocols. To be eligible providers of offset credits in their respective market, offset project operators must register their offset projects with an approved offset project registry. Furthermore, offset projects must be independently verified by an accredited offset verification body, which has the required verification staff who are trained and accredited for the specific type of offset project. Once verified, the offsets generated from the offset project may be sold to subject entities in their respective market, who can use a limited number of offset credits to satisfy up to 8% of their annual compliance obligations under the cap-and-trade program in CA or the cap-and-invest program in WA.

Third-Party Verification Requirements for Low Carbon Fuel Standards (LCFS) and Clean Fuel Program (CFP)

California ARB established the LCFS program in 2009 and Oregon DEQ introduced the CFP in 2016. The main objective of LCFS and CFP is to decrease the carbon intensity of transportation fuel pool and to provide an increasing range of low-carbon and renewable alternatives, which would benefit air quality from reducing petroleum dependency. The LCFS/CFP relies on accurate data monitoring, reporting, and verification to support implementation and tracking of effectiveness. In 2018, ARB amended the LCFS regulation to add third-party verification requirements to ensure data completeness, accuracy, and conformance with the regulation, consistent with the verification programs under California's Cap-and-Trade Program and international best practices. The third-party verification requirements for Oregon's CFP started in 2022.

Partnering with Trinity Consultants

Trinity is an approved verification body in California, Oregon, and Washington. Our accredited offset verification and GHG verification services are performed by experienced environmental professionals with engineering backgrounds, most with advanced degrees and professional certifications. Our multi-disciplinary staff provides the highest-quality verification services that enhance regulatory compliance while maximizing operational flexibility. Trinity serves its clients through an unparalleled combination of regulatory expertise, technical proficiency, responsiveness, and creative thinking. In addition, Trinity's Quality Management System ensures that clients consistently receive high-quality verification services. Trinity's GHG verification team provides the following unique benefits to our clients:

- ▶ **Accredited Verification Services for All Sectors:** Trinity is an accredited offset and GHG verification body. Our team includes experienced ARB-accredited offset verifiers and GHG verifiers with all four types of sector specific accreditations (i.e., General, Oil and Gas, Process, and Transaction).
- ▶ **Proven Track Record:** As one of the most active ARB-accredited verification bodies, Trinity completes more than 60 verifications annually, with resoundingly positive feedback.
- ▶ **Recognized Industry Leader:** Trinity is recognized as an industry leader in air quality and climate change issues.
- ▶ **In-Depth Knowledge:** Trinity's team has extensive experience based on in-depth knowledge of GHG emission inventories and GHG-related regulatory requirements.
- ▶ **High Quality Work Products:** Trinity's consulting and verification practices and operations are quality assured for delivery of superior technical products.
- ▶ **Relevant Project Experience:** Trinity has relevant experience in GHG verifications, GHG management and emission reduction plans, enterprise-wide inventories, and carbon foot-printing exercises for national and international corporations across various industry sectors and locations.

- ▶ **Cost Effectiveness:** Trinity offers cost-competitive project budgets and works efficiently using in-house checklists, protocols, and other tools developed during extensive GHG emissions verification/inventory projects.
- ▶ **Local Offices in California, Oregon, and Washington:** Fully staffed offices with accredited verifiers are strategically located to cover all three states, with multiple offices in California.

Industry Clients

Trinity's verification team has provided GHG verification services to the following industry sectors:

- ▶ Aerospace
- ▶ Agriculture
- ▶ Cement and lime manufacturing
- ▶ Chemicals production
- ▶ Colleges and universities
- ▶ Crude petroleum and natural gas extraction
- ▶ Fuel Suppliers
- ▶ General manufacturing
- ▶ Metals and minerals mining
- ▶ Natural gas distribution
- ▶ Petroleum refining
- ▶ Power entities (electricity transactions)
- ▶ Power generation
- ▶ Pulp and Paper

Related Services

In addition to GHG and offset project verification services, Trinity offers a wide variety of other climate change, sustainability, and GHG-related services:

- ▶ MRR reporting following EPA, ARB, DEQ or Ecology requirements
- ▶ Cap-and-trade/cap-and-invest forecasting and compliance
- ▶ Cap-and-trade/cap-and-invest benchmark evaluation and rulemaking support
- ▶ GHG verification in other programs and registries (e.g., CDP, CAR, and VCS)
- ▶ GHG program training
- ▶ GHG emission reduction plans

For more information on how Trinity can assist you, please contact:

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ISO 9001:2015 certified at our corporate office in Dallas, Texas