



Offline feedback survey on PCAF's new guidance and methods for the financial industry

December 2024

Online feedback survey on PCAF's new guidance and methods for the financial industry

The purpose of this document is for stakeholders to prepare their responses to the online survey. All consultation responses should be submitted via the online survey for [Part A](#) and [Part C](#).

This document contains all consultation questions. It is not required to respond to each guidance or method. We encourage you to respond to the guidance and methods relevant to you or your organization.

Please note the question numbers in this document may not exactly line up to the question numbers in the survey due to gateway questions that unlock certain sections e.g., *"Would you like to provide feedback on X method?"*

PART I. CONTACT INFORMATION (REQUIRED)

1. First name
2. Last name
3. Job title
4. Organization name
5. Type of organization (choices: commercial bank / investment bank / development bank / asset owner / asset manager / insurance company / data provider / NGO / consultant / policy maker or regulator / other)
6. Country (HQ of organization)
7. Email address

PART II. FEEDBACK ON PART A GUIDANCE AND METHODS

USE OF PROCEEDS ACCOUNTING

USE OF PROCEEDS STRUCTURES

1. What is your overall impression of the method?
 - a. Very positive
 - b. Positive
 - c. Neutral
 - d. Negative
 - e. Very negative
2. What do you like most about it?
3. What would have to change for you to have a better impression of the method?

4. How satisfied are you with the method? Please rate the following:

	Very Satisfied	Satisfied	Neutral	Dissatisfied	Very Dissatisfied
Ease of understanding: the method is clear and without ambiguity					
Completeness: the method is of sufficient breadth, depth, and scope					
Applicability: the method is applicable in your regional context					
Consistency: the method is consistent with the carbon accounting principles derived from the GHG Protocol					

5. Would you make change to the method to make it easier to understand / to be more complete / applicable / consistent? If yes, what changes would you make?

6. Can you describe one or two issues that you foresee in implementing the method and which the method description didn't provide help in a sufficient way?

7. How satisfied are you with the section outlining the scope of the method and GHG accounting treatment? If not satisfied, can you elaborate on your concerns, and could you provide suggestions how these concerns could be addressed?

8. How satisfied are you with the sections outlining the calculation approach for UoP structures (emissions scopes covered, attribution, equations to calculate financed emissions and data required)? If not satisfied, can you elaborate on your concerns, and could you provide suggestions how these concerns could be addressed?

9. How satisfied are you with the section outlining the assessment boundary? If not satisfied, can you elaborate on your concerns, and could you provide suggestions how these concerns could be addressed?

10. How satisfied are you with the section outlining the adjustment for under-and overallocation in integrated UoP structures? If not satisfied, can you elaborate on your concerns, and could you provide suggestions how these concerns could be addressed?

11. If applicable, could you provide a use case how this method could be applied within your institution?

12. What do you think are the limitations of this method?

ACCOUNTING FOR PROJECTS WITHOUT A SEPARATE BALANCE SHEET

13. What is your overall impression of the method?

- a. Very positive
- b. Positive
- c. Neutral
- d. Negative
- e. Very negative

14. What do you like most about it?

15. What would have to change in order for you to have a better impression of the method?

16. How satisfied are you with the method? Please rate the following:

	Very Satisfied	Satisfied	Neutral	Dissatisfied	Very Dissatisfied
Ease of understanding: the method is clear and without ambiguity					
Completeness: the method is of sufficient breadth, depth, and scope					
Applicability: the method is applicable in your regional context					
Consistency: the method is consistent with the carbon accounting principles derived from the GHG Protocol					

17. Would you make change to the method to make it easier to understand / to be more complete / applicable / consistent? If yes, what changes would you make?

18. Can you describe one or two issues that you foresee in implementing the method and which the method description didn't provide help in a sufficient way?

19. If applicable, could you provide a use case how this method could be applied within your institution?

20. What do you think are the limitations of this method?

ACCOUNTING FOR FINANCED SCOPE 3 CATEGORY 15 EMISSIONS

21. What is your overall impression of the method?

- a. Very positive
- b. Positive
- c. Neutral
- d. Negative
- e. Very negative

22. What do you like most about it?

23. What would have to change in order for you to have a better impression of the method?

24. How satisfied are you with the method? Please rate the following:

	Very Satisfied	Satisfied	Neutral	Dissatisfied	Very Dissatisfied
Ease of understanding: the method is clear and without ambiguity					
Completeness: the method is of sufficient breadth, depth, and scope					
Applicability: the method is applicable in your regional context					
Consistency: the method is consistent with the carbon accounting principles derived from the GHG Protocol					

25. Would you make change to the method to make it easier to understand / to be more complete / applicable / consistent? If yes, what changes would you make?

26. Can you describe one or two issues that you foresee in implementing the method and which the method description didn't provide help in a sufficient way?

27. If applicable, could you provide a use case how this method could be applied within your institution?

28. What do you think are the limitations of this method?

29. If you have any further feedback on the content of this Consultation Draft (all use of proceeds accounting sections) that is not addressed by the questions above, please provide it here.

SECURITIZATIONS AND STRUCTURED PRODUCTS

30. *(Required)* What role do you perform in relation to Securitization and Structured Products (select all that apply):

- a. Originator
- b. Issuer (are there any cases where the Originator is not the issuer)
- c. Arranger
- d. Investor
- e. Facilitator (Arranger/Underwriter/Lead Manager/Co-Manager)
- f. Trustee
- g. Data provider
- h. Consultant
- i. Other (please specify)

31. What is your overall impression of the method?

- a. Very positive
- b. Positive
- c. Neutral
- d. Negative
- e. Very negative

32. What do you like most about it?

33. What would have to change in order for you to have a better impression of the method?

34. How satisfied are you with the method? Please rate the following:

	Very Satisfied	Satisfied	Neutral	Dissatisfied	Very Dissatisfied
Ease of understanding: the method is clear and without ambiguity					
Completeness: the method is of sufficient breadth, depth, and scope					
Applicability: the method is applicable in your regional context					
Consistency: the method is consistent with the carbon accounting principles derived from the GHG Protocol					

35. Would you make change to the method to make it easier to understand / to be more complete / applicable / consistent? If yes, what changes would you make?

36. Can you describe one or two issues that you foresee in implementing the method and which the method description didn't provide help in a sufficient way?

37. How satisfied are you with the section outlining the Asset class definition? If you are not satisfied, can you elaborate on any concerns, and could you provide suggestions how these concerns could be addressed?

38. Are there any Securitization and Structured Products not currently in scope that you feel should be included? Please provide your rationale.

39. How satisfied are you with the section outlining the General guidance on emissions accounting? If you are not satisfied, can you elaborate on any concerns, and could you provide suggestions how these concerns could be addressed?

40. Is the guidance in Figure 2.22. Allocation of emissions (financed & facilitated) throughout the loan origination and securitization process sufficient? If you don't agree, can you elaborate on any concerns, and could you provide suggestions how these concerns could be addressed?

41. The guidance covers typical (true sale) securitization structures in the main body of the guidance and structural nuances, including different structures, structural features, accounting for principal loss and default, in the technical appendix. Do you agree with the approach?

42. How satisfied are you with the section outlining the Emission scopes covered and the level of granularity? If you are not satisfied, can you elaborate on any concerns, and could you provide suggestions how these concerns could be addressed?

43. How satisfied are you with the section outlining the Attribution of emissions and the level of granularity in the guidance?

	Very Satisfied	Satisfied	Neutral	Dissatisfied	Very Dissatisfied
Overall attribution approach and principles					
Collateral attribution factor					
Loan attribution factor					
Tranche attribution factor					
Investment attribution factor					

44. How satisfied are you with the section outlining the Attribution of emissions and the quality of the Collateral Attribution guidance?

	Very Satisfied	Satisfied	Neutral	Dissatisfied	Very Dissatisfied
Ease of understanding: the method is clear and without ambiguity					
Completeness: the method is of sufficient breadth, depth, and scope					

Applicability: the method is applicable in your regional context					
Consistency: the method is consistent with the carbon accounting principles derived from the GHG Protocol					

45. If you have any, can you elaborate on any concerns related to Attribution of emissions guidance, and could you provide suggestions how these concerns could be addressed?

46. How satisfied are you with the section outlining the Equations to calculate financed emissions and the level of granularity? If you are not satisfied, can you elaborate on any concerns, and could you provide suggestions how these concerns could be addressed?

47. A worked example for an RMBS deal is provided. Is this useful and sufficient? If not, could you elaborate on any concerns and/or provide suggestions on the need a format of further worked examples and/or guidance.

48. How satisfied are you with the section outlining the Data required and data quality score and the level of granularity? If you are not satisfied, can you elaborate on any concerns, and could you provide suggestions how these concerns could be addressed?

49. Do you agree that Originators should provide loan level data to assist with the calculation of financed emissions?

- a. Agree
- b. Neutral
- c. Disagree

50. The guidance suggests certain types of data that would be useful in estimating emissions. What level of data do you believe should be provided by originators?

	All listed	Minimum required
Residential real estate		
Commercial real estate		
Motor vehicles / autos		
Other hard assets		

51. What issues to you anticipate Originators will encounter in providing this data?

52. Can you suggest data sources for further information.

53. Is the guidance in Figure 2.25 Structured products data quality decision tree useful and sufficient? If not, can you elaborate on any concerns, and could you provide suggestions how these concerns could be addressed?

54. How satisfied are you with the section outlining the Assessment boundary and the level of granularity? If you are not satisfied, can you elaborate on any concerns, and could you provide suggestions how these concerns could be addressed?
55. How satisfied are you with the section outlining the Limitations and the level of granularity? If not, what other limitations do you see with the methodology outlined?
56. How satisfied are you with the position on double counting? If not satisfied, can you elaborate on any concerns, and could you provide suggestions how these concerns could be addressed?
57. How satisfied are you with the section outlining the Additional Guidance: Different types of structures and the level of granularity? If not satisfied, can you elaborate on any concerns, and could you provide suggestions how these concerns could be addressed?
58. How satisfied are you with the section outlining the Additional Guidance: Different types of exposures within structures and the level of granularity? If not satisfied, can you elaborate on any concerns, and could you provide suggestions how these concerns could be addressed?
59. How satisfied are you with the section outlining the Additional Guidance: Principal loss and default and the level of granularity? If not satisfied, can you elaborate on any concerns, and could you provide suggestions how these concerns could be addressed?
60. If you have any further feedback on the content of this Consultation Draft that is not addressed by the questions above, please provide it here.

SUB-SOVEREIGN DEBT

61. What is your overall impression of the method?
- Very positive
 - Positive
 - Neutral
 - Negative
 - Very negative
62. What do you like most about it?
63. What would have to change in order for you to have a better impression of the method?
64. How satisfied are you with the method? Please rate the following:

	Very Satisfied	Satisfied	Neutral	Dissatisfied	Very Dissatisfied
Ease of understanding: the method is clear and without ambiguity					
Completeness: the method is of sufficient breadth, depth, and scope					
Applicability: the method is applicable in your regional context					

Consistency: the method is consistent with the carbon accounting principles derived from the GHG Protocol					
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65. Would you make change to the method to make it easier to understand / to be more complete / applicable / consistent? If yes, what changes would you make?

66. Can you describe one or two issues that you foresee in implementing the method and which the method description didn't provide help in a sufficient way?

67. In this method we have defined three sub-sovereign levels (Region, City, Local). However, it would also be possible to only define two administrative levels only (Region, City & Local) as shown in the below options. Do you agree that three sub-sovereign levels should be used? If you disagree, why would you prefer using two sub-sovereign levels?

Option 1: Three sub-sovereign levels

- *Pro: Explicitly shows "city" as a separate level, CDP provides city data with a good coverage*
- *Con: Basically no municipality data available, hence we include a level without data at all*

Option 1 Example	
Country Level	France
Regional Level	Ile-de-France
City Level	City of Paris / Metropole du Grand Paris
Local Level	Paris, Essonne and other municipalities

Option 2: Two sub-sovereign levels

- *Pro: Less administrative levels may be less complex and as municipal data basically not available we group it with city data where data is in fact available*
- *Con: City level not explicitly shown as a separate level but city level data is available (via CDP)*

Option 2 Example	
Country Level	France
Regional Level	Ile-de-France
City & Local Level	City of Paris as well as Paris, Essonne and other municipalities

68. Are you aware of any additional data sources for sub-sovereign emission data for other countries except US, Canada, EU, Australia (in particular EM countries) and on different administrative levels (e.g. local level)?

69. The proposal is to deal with the issue of double or even triple accounting of emissions by separate reporting of financed emissions on the different levels (e.g. city financed emissions separate from regional financed emissions). In your opinion is this a “should” or “may” criteria in the new standard?

- a. Should
- b. May
- c. Other (please explain)

70. As there is no PPP-adjusted GDP, we propose to use a PPP-adjustment factor on country level and apply it to regional or local GDP. Do you agree this is this acceptable as a proxy? If you think using a PPP-adjustment factor on country level and applying it to regional or local GDP is not acceptable, please explain why.

71. Is there a better way to approximate PPP-adjusted GDP for Sub-Sovereigns? If yes, what do you think is a better way to approximate this?

72. Is there a better allocation factor than PPP-adjusted GDP? If yes, what do you think is a better allocation factor?

73. Is it recommended to adjust for PPP for sub-sovereigns? If yes, do financial institutions largely buy sub-sovereign from one nation or actually multiple so that it remains important to compensate?

74. While the attribution factor "exposure to sovereign debt/GDP USD PPP" is aligned to the Sovereign standard, is it acceptable to take the ratio of debt at market exchange and PPP GDP as the two are not comparable?

75. Is it recommended to aggregate attribution factor as total debt can surpass 100% (applies also when relying on market exchange rate GDP)?

76. While the attribution factor "exposure to sovereign debt/GDP USD PPP" is aligned to the Sovereign standard, is it acceptable to mix stock (debt) and flow (GDP) figures?

77. Are you aware of any data sources at the sub-sovereign level globally or in your region? If so, please include a source to them.

78. The data quality table for sub-sovereigns includes various proposals how to approximate emissions for sub-sovereigns. Are the options clear and do they make sense?

79. Is the data quality table understandable? (as it is complex to include the different sub-sovereign levels).

80. One option for data is: Reported GHG emissions of the total sub-sovereign territory are not known. But reported emissions of a territory within the sub-sovereign territory are known, e.g. city or municipality level data within a larger region. Emissions are calculated using reported data

from a fraction of the sub-sovereign territory and extrapolated to represent the full region. What could be an appropriate extrapolation factor?

81. Another option for data is: Reported GHG emissions of sub-sovereign territory of the issuer are not known. But reported emissions of a larger territory are known e.g., no city data but data for the region in which the city is located. Emissions are calculated using a break-down of reported data on a higher level using an appropriate allocation factor. What could be an appropriate break-down factor?

82. Does a PCAF Data Quality Score 3 makes sense for Options 3 and 4 that are based on territorial aggregation and break-down? Or is this rather a Data Quality Score 4?

83. If you have any further feedback on the content of this Consultation Draft that is not addressed by the questions above, please provide it here.

FINANCED AVOIDED EMISSIONS AND FORWARD-LOOKING METRICS

AVOIDED EMISSIONS

84. What is your overall impression of the method?

- a. Very positive
- b. Positive
- c. Neutral
- d. Negative
- e. Very negative

85. What do you like most about it?

86. What would have to change in order for you to have a better impression of the method?

87. How satisfied are you with the method? Please rate the following:

	Very Satisfied	Satisfied	Neutral	Dissatisfied	Very Dissatisfied
Ease of understanding: the method is clear and without ambiguity					
Completeness: the method is of sufficient breadth, depth, and scope					
Applicability: the method is applicable in your regional context					
Consistency: the method is consistent with the carbon					

accounting principles derived from the GHG Protocol					
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88. Would you make change to the method to make it easier to understand / to be more complete / applicable / consistent? If yes, what changes would you make?

89. Can you describe one or two issues that you foresee in implementing the method and which the method description didn't provide help in a sufficient way?

90. Should the method require all avoided emissions calculations, from FI's and counterparties, to follow one specific calculation method (e.g. WBCSD)

91. What is your impression of the guardrails listed for avoided emissions? Would you change anything in this section, and if yes, what?

92. Should avoided emissions be restricted to outside the value chain?

- a. Yes, in all cases
- b. No, in all cases
- c. For general corporate instruments only (currently reflected in the guidance)
- d. For instruments with specified use of proceeds only

93. Should FIs be allowed to estimate avoided emissions in the cases where a counterparty has not calculated and disclosed them?

94. What do you think are the limitations of this method?

95. Should FIs be required to report avoided emissions from generic instruments separately from those with specified use of proceeds?

96. Does your financial institution currently disclose or plan to disclose avoided emissions?

97. If applicable, could you provide a use case how this method could be applied within your institution?

FORWARD-LOOKING METRICS

98. What is your overall impression of the method?

- a. Very positive
- b. Positive
- c. Neutral
- d. Negative
- e. Very negative

99. What do you like most about it?

100. What would have to change in order for you to have a better impression of the method?

101. How satisfied are you with the method? Please rate the following:

	Very Satisfied	Satisfied	Neutral	Dissatisfied	Very Dissatisfied
Ease of understanding: the method is clear and without ambiguity					
Completeness: the method is of sufficient breadth, depth, and scope					
Applicability: the method is applicable in your regional context					
Consistency: the method is consistent with the carbon accounting principles derived from the GHG Protocol					

102. Would you make change to the method to make it easier to understand / to be more complete / applicable / consistent? If yes, what changes would you make?

103. Can you describe one or two issues that you foresee in implementing the method and which the method description didn't provide help in a sufficient way?

104. What is your impression of the guardrails listed for forward-looking emissions metrics? Would you change anything in this section, and if yes, what?

105. Which EER options presented are you supportive of?

- a. Option 1: EER as 'expected absolute emissions' only
- b. Option 2: EER as 'expected avoided emissions' only
- c. Both options
- d. Neither option

106. Please explain your thinking on the EER options you are or are not supportive of.

107. What do you think are the limitations of this method?

108. Are there additional transition finance related metrics that PCAF should consider in future guidance?

109. Does your financial institution currently disclose or plan to disclose transition finance metrics?

110. If applicable, could you provide a use case how this method could be applied within your institution?

OPTION TO DISAGGREGATE ACCORDING TO PORTFOLIO CHARACTERISTICS

- 111. What is your overall impression of the new reporting recommendation?
 - a. Very positive
 - b. Positive
 - c. Neutral
 - d. Negative
 - e. Very negative
- 112. What do you like most about it?
- 113. What would have to change in order for you to have a better impression of the method?
- 114. How satisfied are you with the method? Please rate the following:

	Very Satisfied	Satisfied	Neutral	Dissatisfied	Very Dissatisfied
Ease of understanding: the recommendation is clear and without ambiguity					
Completeness: the recommendation is of sufficient breadth, depth, and scope					
Applicability: the recommendation is applicable in your regional context					

- 115. Would you make change to the method to make it easier to understand / to be more complete / applicable / consistent? If yes, what changes would you make?
- 116. Can you describe one or two issues that you foresee in implementing the recommendation?
- 117. If you have any further feedback on the content of this Consultation Draft that is not addressed by the questions above, please provide it here.

INVENTORY FLUCTUATIONS
DENOMINATOR

- 118. Choice of metric in denominator: Do you agree that EVIC remains the most credible measure?
- 119. Based on the analysis in this report, and/or any internal analysis that you may have conducted, do you have a preferred approach for dampening (reducing) the volatility (year-on-year differences) in the denominator for financed emissions disclosures, and if so, what is it?
- 120. Do you think that applying a 3-year moving average of EVIC is meaningful, practical, and would increase transparency of financed emissions disclosures?

121. Have you evaluated options to consider multi-year rolling averages as the denominator for calculating attribution factors?

122. Are there implementation and data challenges that could be potential blockers for such an adoption?

123. Is there a requirement for additional methodology clarifications to avoid any incorrect interpretation of this approach?

124. The Working Group analysis was based on a globally homogenous equities-only portfolio. Do participants foresee any specific implementation challenges of this recommendation for concentrated portfolios?

125. As an alternative, would your organization prefer not to adjust and provide an emissions attribution analysis be useful to better understand and communicate the drivers of emission developments? Would participants prefer to make such an attribution analysis disclosure mandatory or optional for FIs?

TREATING TEMPORAL MISALIGNMENT OF DATA

126. Are there any additional significant data lag issues that should be addressed?

127. Are there other options that should be considered?

128. Should PCAF recommend an option and if so, what should it be?

ECONOMIC EMISSION FACTOR ADJUSTMENTS

129. Do you support a price adjustment of emission factor?

130. Is this guidance meaningful and sufficient?

131. Should this guidance be added to the PCAF Standard? Once it has been added, it will also be incorporated into the datasets in the PCAF Database.

REPORTING RECOMMENDATIONS

132. Does your institution run an attribution analysis and report them externally?

133. Have you faced any implementation challenges in running such attribution analyses. If so, please expand in the comments.

134. Do you agree with the current recommendation to make such a disclosure as optional, or do you feel there is a case to make it mandatory?

135. Should PCAF create a separate working group to develop a consistent approach to conduct attribution analyses?

GENERAL

136. If you have any further feedback on the content of this Consultation Draft that is not addressed by the questions above, please provide it here.

UNDRAWN LOAN COMMITMENTS

137. What is your overall impression of the method?

- a. Very positive

- b. Positive
- c. Neutral
- d. Negative
- e. Very negative

138. What do you like most about it?

139. What would have to change in order for you to have a better impression of the method?

140. How satisfied are you with the method? Please rate the following:

	Very Satisfied	Satisfied	Neutral	Dissatisfied	Very Dissatisfied
Ease of understanding: the method is clear and without ambiguity					
Completeness: the method is of sufficient breadth, depth, and scope					
Applicability: the method is applicable in your regional context					
Consistency: the method is consistent with the carbon accounting principles derived from the GHG Protocol					

141. Would you make change to the method to make it easier to understand / to be more complete / applicable / consistent? If yes, what changes would you make?

142. Can you describe one or two issues that you foresee in implementing the method and which the method description didn't provide help in a sufficient way?

143. Do you agree with the definition of undrawn loan commitments described in this document for guiding purposes? If not, can you elaborate on why and suggest additional conditions, which should be reflected in its definition?

144. Do you agree with the proposed calculation methodology as the recommended option for the undrawn loan's calculation methodology (comparing it to the calculation options outlined in the technical appendix)? If not, please provide your reasoning for not agreeing with the proposed calculation methodology.

145. Do you agree with aligning the calculation of financed emissions associated with undrawn loan commitments with the one-point-in-time calculation of financed emissions – in line with annual financial statements? If not, please provide your reasoning for not agreeing with this alignment.

146. Do you agree with the recommended reporting requirement to disclose financed emissions from drawn amounts separately to potential emissions from undrawn loan commitments? If not, please provide your reasoning for not agreeing with the reporting recommendation.

147. If you have any further feedback on the content of this Consultation Draft that is not addressed by the questions above, please provide it here.

PART III. FEEDBACK ON PART C METHODS

TREATY REINSURANCE

1. What is your overall impression of the method?
 - a. Very positive
 - b. Positive
 - c. Neutral
 - d. Negative
 - e. Very negative
2. What do you like most about it?
3. What would have to change in order for you to have a better impression of the method?
4. How satisfied are you with the method? Please rate the following:

	Very Satisfied	Satisfied	Neutral	Dissatisfied	Very Dissatisfied
Ease of understanding: the method is clear and without ambiguity					
Completeness: the method is of sufficient breadth, depth, and scope					
Applicability: the method is applicable in your regional context					
Consistency: the method is consistent with the carbon accounting principles derived from the GHG Protocol					

5. Would you make change to the method to make it easier to understand / to be more complete / applicable / consistent? If yes, what changes would you make?
6. Can you describe one or two issues that you foresee in implementing the method and which the method description didn't provide help in a sufficient way?

FOR ALL RE/INSURERS

7. Shall the Insurance-Associated Emission Standard be adjusted so that "re/insurer should report insurance associated emissions based on gross premiums (before reinsurance) as well as net premiums (after reinsurance)? If not, can you elaborate on any concerns, and could you provide suggestions how these concerns could be addressed?
8. Do you agree with the general proposed approach? If not, can you elaborate on any concerns, and could you provide suggestions how these concerns could be addressed?

FOR PRIMARY INSURANCE COMPANIES

9. Are you willing to share data with your reinsurers to enable them to calculate insurance-associated emissions (i.e. treaty-level emissions, share of premiums within a treaty in scope with the Insurance-associated Emission Standard) data with reinsurers in the future? If not, can you elaborate on why you are not willing to share this data?

FOR REINSURERS ONLY

10. Do you agree with the general proposed approach to calculate treaty reinsurance associated emissions using the ratio of ceded premiums and gross premiums and the insurance-associated emissions of the primary insurance company? If not, can you elaborate on any concerns, and could you provide suggestions how these concerns could be addressed?

11. Unavailability of cedent level data will prevail for a number of years. Do you agree to calculate insurance associated emissions based on high level estimates (Method B)?

- a. Agree, should be mandatory
- b. Agree, should only be a recommendation
- c. Agree, should only be voluntarily
- d. Neutral
- e. Disagree

12. Can you please elaborate on your answer to the previous question?

13. Do you find the description of proxy data comprehensive? If not, can you elaborate on any concerns and what you think is missing in the description, as well as suggestions for other proxy data?

14. What approach for Method A do you favor for reinsurance treaties covering lines of business not in scope of the PCAF standard? (See Figure X on page 23)

- a. Approach 1 (simple): Use overall ratio of ceded premiums and gross premiums
- b. Approach 2 (accurate): Determine ratio of ceded premiums and gross premiums only based on business in scope of the Insurance-Associated Emissions Standard
- c. Other (please specify)

15. What approach for Method B do you favor for reinsurance treaties covering lines of business not in scope of the PCAF standard? (See Figure X on page 23)

- a. Approach 1: No reporting to avoid inaccurate data
- b. Approach 2: Estimate only for lines of business in scope of the Insurance-Associated Emissions Standard
- c. Other (please specify)

16. If you have any further feedback on the content of this Consultation Draft that is not addressed by the questions above, please provide it here.

17. Which topic(s) would you propose for future methodology development within the PCAF Standard: Part C? Please select any methodologies that you would like to see from PCAF:

- a. Commercial insurance: Structured trade credit

- b. Commercial insurance: Corporate life and pensions, personal accident
- c. Public entities: Insurance contracts purchased by public entities
- d. Personal lines: home insurance (liability & property)
- e. Personal lines: Other/Special lines: Travel assistance
- f. Personal lines: Other/Special lines: Legal assistance
- g. Personal lines: Other/Special lines: Pet
- h. Personal lines: Life and Health
- i. Claims
- j. [Open text field] Other: Please provide details

PROJECT INSURANCE

18. What is your overall impression of the method?

- a. Very positive
- b. Positive
- c. Neutral
- d. Negative
- e. Very negative

19. What do you like most about it?

20. What would have to change in order for you to have a better impression of the method?

21. How satisfied are you with the method? Please rate the following:

	Very Satisfied	Satisfied	Neutral	Dissatisfied	Very Dissatisfied
Ease of understanding: the method is clear and without ambiguity					
Completeness: the method is of sufficient breadth, depth, and scope					
Applicability: the method is applicable in your regional context					
Consistency: the method is consistent with the carbon accounting principles derived from the GHG Protocol					

22. Would you make change to the method to make it easier to understand / to be more complete / applicable / consistent? If yes, what changes would you make?

23. Can you describe one or two issues that you foresee in implementing the method and which the method description didn't provide help in a sufficient way?

24. Do you agree that it is clear which lines of business are and are not in-scope of the methodology? If not, can you elaborate on any concerns, and could you provide suggestions how these concerns could be addressed?

25. Do you agree that it is clear which emissions are and are not covered by the methodology? If not, can you elaborate on any concerns, and could you provide suggestions how these concerns could be addressed?

26. Do you think lifetime emissions should be included as an optional 'may' calculate within this methodology? Under the PCAF standard, 'May' indicates an allowed option'.

27. Given the limitations addressed on data availability, do you know of any available emissions data which the working group may have overlooked?

28. If you are a construction company, would you have emissions data available which you would be able to share for the purposes of the calculation?

29. Please share your views on the examples provided within the quality scoring tables and their viability.

30. If you have any further feedback on the content of this Consultation Draft that is not addressed by the questions above, please provide it here.

31. Which topic(s) would you propose for future methodology development within the PCAF Standard: Part C? Please select any methodologies that you would like to see from PCAF:

- a. Commercial insurance: Structured trade credit
- b. Commercial insurance: Corporate life and pensions, personal accident
- c. Public entities: Insurance contracts purchased by public entities
- d. Personal lines: home insurance (liability & property)
- e. Personal lines: Other/Special lines: Travel assistance
- f. Personal lines: Other/Special lines: Legal assistance
- g. Personal lines: Other/Special lines: Pet
- h. Personal lines: Life and Health
- i. Claims
- j. [Open text field] Other: Please provide details

End of survey