



Interim Guidance Third-Party Verification Frequently Asked Questions

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Introduction.....	3
1.1: Third-Party Verification Requirements	3
1.1.2: Who will require third-party verification?	3
1.1.3: What will be verified?	3
1.1.4: What are the reporting and verification deadlines?	3
1.1.5: How long will third-party verification take?	4
1.1.6: How do I exit the third-party verification program requirements?	4
1.2 Initiating Verification	4
1.2.1: Who is responsible for choosing a third-party verification body?	4
1.2.2: What is the cost associated with verification?	4
1.2.3: How can I find a Washington-certified verification body?	4
1.2.4: Can I use a verification body that is not listed on Ecology’s website?	4
1.2.5: How long can I use the same verification body?	4
1.2.6: Can I use our consultant that prepares our GHG emissions reports as the third-party verifier?	5
1.2.7: Can I use a consultant to find a third-party verification body to verify our GHG emissions report?	5
1.3 Conflict of Interest (COI)	5
1.3.1: Where can I find the COI form?	5
1.3.2: When do I use the COI form?	5
1.3.3: Do both the verification body and reporter have to submit the COI form?	5
1.3.4: May I use the same verification body I use in California? Is this considered a COI?	5
1.3.5: Can I use a subcontractor that has previously performed work?	6
1.3.6: Does Ecology review and approve the COI forms?	6
1.3.7: What happens if the COI is identified as medium or high?	6
1.4 Verification Services	6
1.4.1: When are full verification services required?	6
1.4.2: When is a site visit required?	6
1.4.3: What is required for a less-intensive verification?	6
1.4.4: If I am not a mandatory or voluntary participant in the Climate Commitment Act, do I need a full verification?	6
1.5 Sector Specialist	7
1.5.1: Will I need a sector specialist?	7
1.5.2: When is an independent reviewer needed?	7
1.5.3: Will a sector specialist be required to verify landfill emissions?	7
1.6 Verification Process	7
1.6.1: If a verifier identifies an error in my emissions report or product data, can my verification body tell me how to fix them?	7
1.6.2: Will Ecology require all errors to be fixed?	7
1.6.3: How quickly do report corrections need to be made?	8
1.6.4: What is the difference between a nonconformance and a misreporting?	8
1.7 GHGReg/WEDGE	8
1.7.1: Why can’t I find GHGReg/WEDGE in my SAW account?	8
1.7.2: Do I have to update my SAW profile or my GHGReg/WEDGE profile because of the new Climate Portal?	9
1.7.3: How do I get more information about the new CP Portal or GHGReg/WEDGE?	9
1.8 References	9
1.8.1: Where can the Reporting of Emissions of Greenhouse Gases regulations be found?	9
1.8.2: Where are the third-party verification regulations?	9
1.8.3: Who can I reach out to with more questions?	9

Introduction

Washington State Department of Ecology (Ecology) has developed this interim guidance for reporters that report greenhouse gas (GHG) emissions under WAC 173-441 and are required to have these emissions verified by a third party. Ecology is structuring this interim guidance in the format of Frequently Asked Questions (FAQs). This guidance does not have the force of law, does not establish new mandatory requirements for GHG reporting, and in no way supplants, replaces, or amends any of the legal requirements of the Rule. Conversely, an omission or truncation of regulatory requirements in this guidance does not relieve operators of their legal obligation to fully comply with all requirements of WAC 173-441.

1.1: Third-Party Verification Requirements

1.1.2: Who will require third-party verification?

Any entity that emits more than 25,000 metric tons of carbon dioxide equivalent (MT CO₂e) of reported emissions, including biogenic emissions, in accordance with WAC 173-441, will require third party verification of those emissions. All mandatory and voluntary participants (covered entities) under WAC 173-446 Climate Commitment Act will require third-party verification.

1.1.3: What will be verified?

Any reporters that meet the third-party verification requirements must have all reported emissions verified beginning with emissions year 2023. Under WAC 173-441, a reporter is defined as "any of the following subject to this chapter: a facility; a supplier; or an electric power entity."

Additionally, all reported product data will require third-party verification beginning with emissions year 2023.

1.1.4: What are the reporting and verification deadlines?

Deadlines for reporting and verification for emission years 2023 and 2024 are listed in Table 1.

Table 1 – Reporting and Verification Deadlines

Date	Reporting Deadline
January 1, 2023	First compliance period begins
March 31, 2024	2023 GHG emissions report submittal
June 1, 2024	2023 GHG emissions report submittal for EPEs
August 10, 2024	Verification of 2023 GHG emissions report
March 31, 2025	2024 GHG emissions report submittal
June 1, 2025	2024 GHG emissions report submittal for EPEs
August 10, 2025	Verification of 2024 GHG emissions report

1.1.5: How long will third-party verification take?

The third-party verification process is estimated to take 3-4 months on average. Given the duration of time between the reporting and verification deadlines, we encourage reporters to initiate a contract with a verification body as soon as possible.

1.1.6: How do I exit the third-party verification program requirements?

All covered entities under the Climate Commitment Act will require third-party verification through the entire compliance period. The first compliance period consists of emission years 2023-2026.

Reporters who are not covered entities can exit the third-party verification requirements if their emissions drop below 25,000 MT CO_{2e} for two consecutive years.

1.2 Initiating Verification

1.2.1: Who is responsible for choosing a third-party verification body?

It is the reporter's responsibility to select a Washington-certified verification body and negotiate a contract for the verification services. Ecology publishes lists of Washington-certified verifiers and verification body on Ecology's [website](#).

1.2.2: What is the cost associated with verification?

The reporting entity must contract with an approved verification body to undergo third-party verification. The contract between the verification body and the reporter will stipulate the cost for the verification services provided.

1.2.3: How can I find a Washington-certified verification body?

Ecology publishes lists of Washington-certified verifiers and verification bodies on our [website](#). A list of active Washington-certified verification bodies can also be found using Ecology's [GHGReg/WEDGE](#) online application.

1.2.4: Can I use a verification body that is not listed on Ecology's website?

All verification bodies must be Washington-certified. Please contact Ecology at GHGVerification@ecy.wa.gov if you believe a verification body not listed on the website is Washington-certified.

1.2.5: How long can I use the same verification body?

A reporter must not use the same third-party verifier (either organization or individuals) for a period of more than six consecutive years.

1.2.6: Can I use our consultant that prepares our GHG emissions reports as the third-party verifier?

No. A third-party verifier must be Washington-certified and demonstrate that they have no conflict of interest (COI) when verifying a reporter's emissions report. Previous consulting services should be disclosed in the COI statement. See Section 1.3 for more information on COI.

1.2.7: Can I use a consultant to find a third-party verification body to verify our GHG emissions report?

A consultant or consulting company can be hired by the reporter to contract with the verification body on behalf of the reporter. However, additional COI reviews will be necessary. The Designated Representative or Alternate Designated Representative will need to initiate the reporter-verification body relationship using Ecology's [GHGReg/WEDGE](#) online application and submit the COI form.

1.3 Conflict of Interest (COI)

1.3.1: Where can I find the COI form?

The conflict of interest (COI) form can be found on Ecology's [GHGReg/WEDGE](#) application once a verification body-reporter relationship has been initiated. Please contact Ecology at GHGVerification@ecy.wa.gov for an advance copy.

1.3.2: When do I use the COI form?

The COI form is required when initiating a verification body-reporter relationship using Ecology's [GHGReg/WEDGE](#) online application before the verification services begin.

1.3.3: Do both the verification body and reporter have to submit the COI form?

Yes. The verification body and reporter are responsible for submitting and attesting to *identical* COI forms through Ecology's [GHGReg/WEDGE](#) online application.

1.3.4: May I use the same verification body I use in California? Is this considered a COI?

The potential for COI must be disclosed if any employee of the third-party verifier, or any employee of a related entity, or a subcontractor who is a member of the verification team has provided to the reporter any services within the previous five years, unless the service was part of GHG verification for another jurisdiction. If a verification body provides a service to a fuel supplier or electric power entity in another jurisdiction, that will count towards the six consecutive year limit in WAC 173-551-085(b). If a verification body provides a service to a facility in another jurisdiction with a separate physical address than one in Washington state, that will NOT count towards the six consecutive year limit.

1.3.5: Can I use a subcontractor that has previously performed work?

All third-party verifiers must be Washington-certified. Any work performed by the verifier for the reporter within the past five years must be disclosed on the COI form, unless that service was part of a GHG verification for another jurisdiction.

1.3.6: Does Ecology review and approve the COI forms?

Ecology will review the COI as part of the verification application. Ecology review will occur before verification services are allowed to commence.

1.3.7: What happens if the COI is identified as medium or high?

A medium COI indicates Ecology will evaluate the COI Mitigation Plan and may request additional information before approving or denying the reporter-verification body relationship.

A high potential for COI indicates verification services cannot proceed.

1.4 Verification Services

1.4.1: When are full verification services required?

A full verification will be required for all mandatory and voluntary participants in the cap-and-invest program for the 2023 emissions year, that are reported in 2024. See Table 1 for a summary of applicable deadlines.

1.4.2: When is a site visit required?

A site visit is required during full verification services.

1.4.3: What is required for a less-intensive verification?

To qualify for a less-intensive verification for years two and three, after a full verification, a reporting entity must meet several conditions, including (but not limited to):

- a positive or qualified positive verification statement,
- no change in operational control of the reporter,
- no significant change in sources or emissions, and
- no change in verification body.

1.4.4: If I am not a mandatory or voluntary participant in the Climate Commitment Act, do I need a full verification?

Reporters who emit 25,000 MT CO₂e or more per calendar year in total reported GHG emissions, but are not participants in the Climate Commitment Act, require a less-intensive verification.

1.5 Sector Specialist

1.5.1: Will I need a sector specialist?

Sector specialists are required for certain reporters or for those facilities that report emissions from designated subparts from 40 CFR Part 98.

- Fuel suppliers and electric power entities will require a transaction specialist.
- Petroleum refineries, hydrogen production units or facilities, and petroleum and natural gas systems will require an oil and gas emissions sector specialist.
- Most facilities engaged in cement production, glass production, lime manufacturing, pulp and paper manufacturing, iron and steel production, nitric acid production, electronics manufacturing or lead production will require a process emissions specialist.

Reach out to Ecology at GHGVerification@ecy.wa.gov for questions pertaining to specific reporters.

1.5.2: When is an independent reviewer needed?

An independent reviewer is needed for all verifications. It is the role of the independent reviewer to perform a review of the verification services and findings. The independent reviewer will be provided by the verification body under contract with the reporter.

1.5.3: Will a sector specialist be required to verify landfill emissions?

Municipal solid waste (MSW) landfills that report emissions under Subpart HH of 40 CFR Part 98 and industrial landfills that report under Subpart TT do not require sector specialist certification.

1.6 Verification Process

1.6.1: If a verifier identifies an error in my emissions report or product data, can my verification body tell me how to fix them?

No. Verification teams are not allowed to advise reporters on how to plan for, prepare or correct emission reports or product data. If you have questions pertaining to any of these issues, please contact Ecology at GHGReporting@ecy.wa.gov.

1.6.2: Will Ecology require all errors to be fixed?

The reporting entity must revise all correctable errors that affect emissions or product data and submit revised reports to Ecology. Failure to do so will result in an adverse verification statement.

Failure to fix correctable errors that do not affect reported emissions or product data represents a nonconformance but does not, absent other errors, result in an adverse verification statement.

Differences that are the result of differing but reasonable methods of truncation, rounding, or averaging are not considered correctable errors and may not require fixing.

1.6.3: How quickly do report corrections need to be made?

Corrections to the annual GHG report or verification report must be submitted to Ecology no later than forty-five calendar days after discovery of the error or by the verification report deadline, whichever is sooner.

1.6.4: What is the difference between a nonconformance and a misreporting?

A misreporting is a duplicate, incomplete, or otherwise reported emissions the verifier concludes should, or should not, be part of the GHG report or duplicate or other product data verifier concludes should not be part of the GHG report.

Nonconformances result from the failure to use the methods or emission factors specified by WAC 173-441 to calculate emissions, or the failure to meet any other requirements of WAC 173-441 or WAC 173-446. Not all nonconformances lead to material misstatements, but they must be explained and cited in the verification statement.

1.7 GHGReg/WEDGE

1.7.1: Why can't I find GHGReg/WEDGE in my SAW account?

Please note that our GHGReg/WEDGE application has moved from the Air Quality portal in SAW to the Climate Portal (as shown below). This may require you to request the application again within the Climate Portal but does not affect your account in GHGReg.

To access the Climate Portal:

- Go to <https://secureaccess.wa.gov/> and log in with your *existing* SAW credentials.
- Click the “Add a New Service” green button above your current service(s).
- Select the A-Z button.
- Type “Climate” in the filter box to search for the new portal.
- Select “Climate Portal” and click “Apply.”
- Launch the Climate Portal from your SAW services home page. From there you will be able to add GHGReg/WEDGE to your application home page.

Climate Portal provided by Department of Ecology [Access Now](#)

ECY Climate Pollution Reduction Program applications: Refrigerant & A/C Mgmt Platform (RAMP); State Agency GHG Emissions (SAGE); GHG Registration/WA Electronic Database for GHG Emissions (GHGReg/WEDGE); WA Fuel Reporting System (WFRS); HFC

[Contact the help desk for CPRPortal](#) [Remove from my list](#)

Please contact IT with any questions or difficulty with adding the Climate Portal to your SAW account: CPR-IT section – CPRPIT@ecy.wa.gov.

1.7.2: Do I have to update my SAW profile or my GHGReg/WEDGE profile because of the new Climate Portal?

No, your SAW profile and GHGReg/WEDGE information has been retained. Do not create a new profile.

1.7.3: How do I get more information about the new CP Portal or GHGReg/WEDGE?

Online training can be accessed [here](#). Please reach out to GHGReporting@ecy.wa.gov for information about the [GHGReg/WEDGE](#) application and to request a user manual.

1.8 References

1.8.1: Where can the Reporting of Emissions of Greenhouse Gases regulations be found?

GHG Reporting regulations are detailed in [Chapter 173-441 WAC](#).

1.8.2: Where are the third-party verification regulations?

Third-party verification regulations are detailed in [Chapter 173-441-085 WAC](#).

1.8.3: Who can I reach out to with more questions?

Questions on how to report your GHG emissions or product data can be addressed to GHGReporting@ecy.wa.gov.

Questions about the third-party verification process can be addressed to GHGVerification@ecy.wa.gov.

Technical issues surrounding the GHGReg/WEDGE application can be directed to the CPR-IT section: CPRPIT@ecy.wa.gov.