

February 3, 2014

RE: Wastewater GHGs and STARS Innovation

To Whom It May Concern:

The World Resources Institute's program called the Greenhouse Gas Protocol has developed a suite of standards for GHG accounting, with the most widely used being the *Corporate Standard* applying to public, private and educational enterprises. Since its revised publication in 2004, the *Corporate Standard* has been globally adopted as the basis for all major certification programs (e.g. ISO), greenhouse gas (GHG) reporting programs and disclosure initiatives (e.g. The Climate Registry, CDP) and calculation tools.

In 2013, American University conducted an analysis of greenhouse gas emissions attributable to its wastewater. Based on our experience with corporate reporting, this type of emissions calculation and reporting represents an advanced GHG inventory accounting practice that is generally uncommon. Lack of data on waste or wastewater generated, as well as a wide variety of treatment methods and corresponding emission factors, have generally been cited as major barriers.

Institutions such as American University go well beyond current practice in GHG reporting by including emissions related to wastewater treatment.

Respectfully,

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