CORPORATE NET-ZERO STANDARD VERSION 2.0 SECOND PUBLIC CONSULTATION DRAFT: SURVEY QUESTIONS

COMPLETE

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Page 1: About you

Q1

First name

Lasse

Q2

Last name

Leipola

Q3

Job title

climate policy specialist

Q4

Email address

lasse.leipola@finnwatch.org

Q5

Organization name

Finnwatch

Q6

Type of organization

Civil Society & Advocacy NGO

Page 2

Q11

Are you responding to this survey based on your experience and understanding of:

Your experience with a range of organizations

Q12

Are you a current or previous SBTi advisory or working group member?

No

Q13

If so, which group (select as many as are relevant):

Respondent skipped this question

Q14

Which region is your organization headquartered in? If you are responding in a personal capacity, please select the region where you are based.

Europe

Q15

What country is your organization headquartered in? If you are responding in a personal capacity, select the country where you are based.

Finland

Q16

What countries does your company operate in? “Operate in” refers to the presence of activities and/or emissions that would fall within an organizational boundary for a GHG inventory. Select all that apply

Finland

Page 3: INTRODUCTION

Q17

To what extent do you think the Corporate Net-Zero Standard V2.0 is readable and easy to understand?

(no label) Somewhat agree

Q18

If you somewhat or strongly disagree, explain why

Respondent skipped this question

Q19

To what extent do you think the Corporate Net-Zero Standard V2.0 is ambitious enough to meaningfully take science-based climate action?

(no label) Somewhat disagree

Q20

If you somewhat or strongly disagree, explain why

The new, highly nuanced approach to target setting may be necessary to ensure that the requirements drive forward the necessary change in all sectors and companies. However, SBTi should strive to ensure that the big picture on absolute emissions is not being lost in the complexity of multiple targets. This should be done with a clear requirement to express the combined effect of their targets as absolute total emissions. This is already a legal requirement in the EU CSRD and the SBTi should not ask less than what is already required by the law in some major jurisdictions.

Q21

To what extent do you think the Corporate Net-Zero Standard V2.0 is actionable?

Respondent skipped this question

Q22

If you somewhat or strongly disagree, explain why

Respondent skipped this question

Q23

To what extent do you think the Corporate Net-Zero Standard V2.0 will assure the credibility of companies' climate action?

(no label) Somewhat disagree

Q24

If you somewhat or strongly disagree, explain why

The number of allowed methods, sectoral guidance and their combinations makes it difficult to assess what the ambition level is (or can be) in different circumstances. As the role of the sectoral standards is amplified, we would like to point out that some sector-specific pathways (e.g. aviation, FLAG) allow less ambitious emission reduction trajectories than the cross-sector pathway. The SBTi should urgently revise these pathways to make it clear that some business models (such as aviation with fossil fuels or selling beef-based products) cannot and should not be aligned with science-based targets without including meaningful transformation to low-emission alternatives (such as alternative transportation modes/fuels and plant-based protein).

Q25

To what extent do you think that the draft Corporate Net-Zero Standard V2.0 strives for equity?

(no label) Neutral

Q26

If you somewhat or strongly disagree, explain why

Respondent skipped this question

Q27

To what extent do you think that the draft Corporate Net-Zero Standard V2.0 does not compromise environmental sustainability?

(no label) Somewhat disagree

Q28

If you somewhat or strongly disagree, explain why

The list of allowed exclusions in C17.2 should be removed to ensure environmental credibility. The general requirement in C17.1 that allows the exclusion of non-significant categories is enough. The long list of exclusions in C17.2 may in some special occasions lead to very large share of emissions being excluded, which should not be acceptable for a company that strives to have science-based targets. If the list is retained, the conditions must be clearly defined. Now, there are several possible loopholes such as "no contractual and other means of influence exist" in d, "no operational control" in f and "end use is unknown" in g.

Q29

The introduction section outlines the SBTi framework of standards and explains how to use the two cross-sector standards (Corporate Net-Zero Standard V2.0 / Financial Institutions Net-Zero Standard V1.0) and sector standards / sector criteria documents in conjunction. How clear is this explanation? (Select one)

(no label) Clear

Q30

How do you suggest we can improve clarity in this section and throughout the Standard on using various SBTi Standards in conjunction?

Respondent skipped this question

Page 4: 1. NET-ZERO AMBITION

Q31

If companies were required to publish their net-zero ambition in a publicly accessible location (e.g., on their website or in an annual sustainability report), what impact do you believe this would have? (Select all that apply)Note: This criterion is optional for Category B companies.

It would enhance transparency.

It would strengthen credibility for companies pursuing SBTi validation.

It would enhance accountability.

Q32

Is public disclosure of a company’s own net-zero ambition important? (Select all that apply)

It demonstrates transparency and allows external stakeholders to hold companies to account.

It strengthens trust in corporate commitments and the SBTi process.

Page 5: 2. BASE YEAR ASSESSMENT

Q33

In relation to bioenergy and bio-based feedstocks, should the provision of evidence demonstrating the sustainability of these materials be immediately mandatory for validation, or would a phased implementation be more appropriate? (Select one)

Immediately mandatory for all companies.

Q34

Where this evidence is not yet available, what additional mechanisms or safeguards could be applied to ensure sustainability and credibility?

Finnwatch welcomes SBTi’s proposal to develop criteria for approving biomass certification sustainability schemes. We also strongly support that this will be based on existing frameworks to avoid unnecessary administrative burden and cost. The ISEAL Code of Good Practice for Sustainability Systems has been developed internationally to ensure the credibility and quality of certification schemes. This Code sets requirements for standard-setting, assurance and monitoring, evaluation and learning from them, and claims. SBTi should only approve biomass certification operators that comply with the ISEAL Code. Many commercial and widely used biomass certification schemes such as FSC and RSPO are already ISEAL Code Compliant. Please also note the ISEAL Alliance Guidance on Credible Benchmarking (https://isealalliance.org/what-we-do/credible-practice/good-practices-credible-benchmarking). For certification bodies, ISO 17065 is a good reference.

Q35

How do you anticipate this assurance requirement for Category A companies would affect their ability to seek validation under the SBTi Standards? (Select one)

Not relevant to me.

Q36

Should assurance be required for all companies seeking validation under the SBTi Standards, regardless of size? (Select one)

Yes – It should be required for all companies.

Page 6: 3. TARGET SETTING

Q37

The SBTi is exploring different design options to ensure there are no gaps between the expiry of validated targets and the start of a new target cycle. Which of the following approaches do you consider preferable? (Rank in order of preference)

Early renewal option: Companies may set new targets before the end of the current target period.	4
Early renewal requirement: Companies are required to set new targets before the end of the current target period.	2

Mid-term target requirement: Requiring near- and mid-term targets (e.g., 10-year targets alongside 5-year ones), allowing continued progress while performance against previous targets are assessed.	1
Mid-term target recommendation: Encouraging organizations to set near- and mid-term targets (e.g., 10-year targets alongside 5-year ones).	3

Q38

What safeguards or requirements do you think are most important to ensure that this new approach maintains ambition and credibility across companies and sectors? (Select all that apply)

Asset replacement rules (i.e., a benchmark, like technology readiness or availability, to signal when assets should be replaced).

Transparent reporting on asset replacement timelines.

Ensuring full consideration of non-asset replacement options (e.g., energy efficiency, fuel switching).

Ensuring the new approach is consistent with a carbon budget.

Interim emission reduction targets consistent with the science-based carbon budget and asset decarbonization plan.

Q39

How should alignment metrics be used for scope 1 target setting? (Select one)

Used in addition to scope 1 emission-reduction targets.

Q40

Which companies should be required to set long-term scope 1 emissions reduction targets? (Select all that apply)

All companies seeking validation under the SBTi Standards (both Category A and B).

Q41

On what basis should companies be able to make exclusions from a low-carbon electricity (LCE) target, if at all? (Select all that apply)

No consumption should be excluded.

Q42

If you chose ‘based on external criteria’, which of the following do you think is most appropriate? (Select one)

Respondent skipped this question

Q43

How should energy efficiency be addressed in scope 2 target setting? (Select all that apply)

All companies should additionally set energy efficiency targets.

Q44

Do you agree or disagree that a commissioning or re-powering date limit of ten years is appropriate for a LCE target, with certain exemptions permissible? See RE100 and 24/7 frameworks for eligible exemptions. (Select one)

Respondent skipped this question

Q45

If you said ‘somewhat disagree’ or ‘strongly disagree’, please provide your reasoning.

Respondent skipped this question

Q46

How should a phase-in towards hourly matching start in 2030? (Select one)

Respondent skipped this question

Q47

Please provide any additional comments to support your response.

Respondent skipped this question

Q48

Should the SBTi provide a standardized list of low-carbon electricity (LCE) procurement types (e.g., on-site generation, power purchase agreements, utility green tariffs, unbundled certificates) to help determine whether company claims are classified as 'purchasing' or 'matching'? (Select one)

Respondent skipped this question

Q49

Do you agree or disagree that LCE criteria including physical deliverability, hourly matching, and a facility age limit sufficiently incentivize energy efficiency improvements?

Respondent skipped this question

Q50

If you said 'somewhat disagree' or 'strongly disagree', please provide your reasoning.

Respondent skipped this question

Q51

What should the long-term milestones be for low-carbon energy use by companies' value chains? (Select one)

Move faster on electricity — achieve 100% low-carbon electricity by 2035, while maintaining 100% low-carbon heat and overall energy by 2050.

Q52

How should companies set their near-term targets (5-year) to align with the long-term milestones above? (Select one)

SBTi milestones: Targets to meet milestone percentages, e.g., 70% low-carbon energy by 2030, 100% low-carbon electricity by 2040, and 100% low-carbon heat by 2050.

Q53

Should companies that provide professional or advisory services that enable or support fossil fuel extraction, production, distribution, or marketing be required to set revenue phase-out targets for those activities? (Select one)

Yes, all such service providers should set revenue phase-out targets.

Q54

At what threshold of fossil fuel-related revenue should these requirements apply? (Select one)

I don't agree with any of the presented options.

Q55

To what extent do you think Option 1 is suitable or unsuitable for the following products? (Select one per row)

Respondent skipped this question

Q56

To what extent do you think Option 2 is suitable or unsuitable for the following products? (Select one per row)

Respondent skipped this question

Q57

The Standard proposes the option of addressing emissions at the activity pool level for hard-to-trace emission sources in the value chain. How important do you believe the following guardrails are for addressing emissions at the activity pool level in a credible manner? (Select one per row)

Demonstration that traceability at the activity level cannot be established, in line with the Standard's conditions.	Very important
Accounting and reporting rules (e.g., to ensure companies don't claim emission reductions in their inventories when there's no clear physical or accounting link, in line with the GHG Protocol guidance).	Very important
Differentiated claims (e.g., prohibiting claims that suggest direct purchase or value chain decarbonization when the action only involves the purchase of an environmental attribute certificate, rather than the underlying physical commodity).	Very important
Quality criteria to ensure that interventions deliver a comparable transformation and climate impact to direct value-chain mitigation.	Very important

Q58

To what extent do you support or oppose the proposed quality criteria for activity pools set out in Box 3. (Select one per row)

Functional equivalence: Goods/services are substitutable and provide the same utility.	Strongly support
Physical connectivity: Demonstrable probability that purchases/services are physically served by the pool.	Strongly support
Geographic and operational clarity: Pools represent real sourcing regions, logistics routes, factory clusters or grids and avoid overly broad or overlapping pools. Boundaries must be disclosed.	Strongly support
Temporal relevance: Emissions factors (EFs) quantifying pool performance align to the reporting year. Where unavailable, use data ≤3 years old data with justification and update plans. Short-lived interventions (e.g., fuels) must align with the same reporting period.	Strongly support
Emissions factors: Use the most representative, minimally disaggregated EF available, together with justification.	Strongly support
Double-counting safeguards: Apply residual averages for non-participating actors and consider independent registries (or equivalent controls) to manage claims where multiple buyers share a pool.	Strongly support
Transparency & MRV: Public disclosure of pool boundaries, EF methodology, chain of custody models, allocation rules and reconciliation periods. Third-party verification is required for pooled claims.	Strongly support

Q59

Are there any additional options for addressing emissions at the activity pool level that the SBTi should consider, and how could performance against these options be credibly demonstrated?

Respondent skipped this question

Q60

The Standard proposes interventions at the sector level (e.g., unbundled procurement of commodity or energy EACs from sources that cannot be traced to the company's value chain) as an option when a low-carbon alternative is not yet available in the value-chain of the company. How important do you believe the following guardrails are for addressing emissions at the sector level? (Select one per row)

Justification for addressing emissions at the sector level.	Very important
Eligibility criteria defining which sectors and activities qualify as hard-to-abate.	Very important
Limits on the portion of emissions addressed through sector-level interventions.	Very important
Accounting and reporting guardrails (e.g., not deducting mitigation outcomes from sector-level interventions from the company's GHG emissions inventory).	Very important
Differentiated claims (e.g., disallowing claims that imply direct value-chain mitigation, such as "low-carbon procurement").	Very important
Quality criteria to ensure that interventions contribute to sectoral transformation consistent with 1.5°C pathways.	Very important

Q61

To what extent do you agree that Advanced Market Commitments (AMCs) should be incorporated into the Corporate Net-Zero Standard as an eligible form of sector-level intervention for addressing scope 3 emissions? (Select one)

Respondent skipped this question

Q62

If AMCs are incorporated as an eligible form of sector-specific intervention for addressing scope 3 emissions, how could this be implemented into the Standard to ensure credible outcomes? Please consider safeguards, matching requirements, or design principles.

Respondent skipped this question

Page 7: 4. TAKING RESPONSIBILITY FOR ONGOING EMISSIONS

Q67

Do you think the proposed minimum responsibility level for recognition (1% of ongoing scope 1–3 emissions) is appropriate given the desire for wide participation? If not, please indicate what minimum % coverage you consider credible. (Select one)

Yes – The 1% level is appropriate.

Page 8: 4. TAKING RESPONSIBILITY FOR ONGOING EMISSIONS

Q69

What do you consider to be an appropriate required level of responsibility in 2035 for Category A companies? (Select one)

Over 10% of scopes 1-3 is appropriate.

Q70

What are the potential benefits of including illustrative detail on the post-2035 requirement at this stage for companies? (Select all that apply)

Respondent skipped this question

Q71

If you consider there is a benefit in including this illustrative detail now, please indicate how important you consider the inclusion of the following illustrative criteria to be at this stage:

Respondent skipped this question

Q72

Which durability approach do you consider most appropriate for neutralizing residual emissions at the net-zero target year? (Select one)

Portfolio approach with a share of more durable and less durable removals aligned with global removals pathway from Paris-aligned scenarios (option presented in draft Standard).

Q73

What level of responsibility should companies hold for neutralizing residual scope 3 emissions at the net-zero target year? (Select one)

Shared responsibility

Page 9: 5. ASSESSING PERFORMANCE AND RENEWING TARGETS

Q76

How willing is your company to publicly disclose the percentage achievement for each target? (Select one)

Respondent skipped this question

Q77

How should the SBTi communicate company performance against targets? (Select all that apply)

The SBTi should indicate whether each company has met or not met its target(s).

The SBTi should provide graded performance categories (e.g., “on track,” “partially met,” “not met”).

The SBTi should require companies to publish explanations for any underperformance.

The SBTi should publish aggregate or anonymized summaries of overall progress.

Q78

How could the reporting requirements be made more clear? (Select all that apply)

Respondent skipped this question

Q79

When gaps in performance are identified, should companies be required, recommended, or permitted to purchase or use removals to address these gaps? Note: Companies would not be permitted to claim that they have met their targets even if removals are used to address the performance gap. (Select one)

Use of removals should be required.

Page 10: 6. CLAIMS

Q80

Is the information in Chapter 6 and Annex D clear and accessible enough to support the development of claims? (Select one)

Yes, Chapter 6 and Annex D are clear, but I think more details are needed.

Q81

Do you foresee any risks or potential misinterpretations arising from proposed claims in Annex D, and what mitigation measures would you suggest to address them (for example, clearer definitions, disclosure requirements, third-party verification, or communication guidance)?

For clarity, only claims that express total emissions (with limited exemptions) in absolute terms should be accepted. Partial targets (e.g. covering only scope 1 emissions) or intensity based targets – or combination of these two! – can be very misleading (without stated impact on total emissions) as they do not typically represent the overall climate impact or performance of a company.

Page 11: ANNEX E: INTEGRITY PRINCIPLES FOR SUBSTANTIATING PROGRESS ON SCOPE 1, 2 AND 3 TARGETS USING EACS

Q82

To what extent do you agree or disagree that the integrity principles for energy and commodity environmental attribute certificates (EACs) presented in Annex E provide sufficient guardrails to ensure the certificates meaningfully convey the desired attribute and are transacted in a manner that ensures robust and credible demonstration of performance against targets: (Select one per row)

Respondent skipped this question

Q83

Are there any key gaps or missing principles that could strengthen the proposed integrity principles for energy and commodity EACs?

Social and environmental safeguards are missing. We recommend a requirement for actors related to EACs to respect human rights in line with UN Guiding Principles. In addition, there should be a requirement for no significant environmental harm (on aspects not covered by the certification).

Q84

For companies that purchase energy and commodity environmental attribute certificates (EACs) or stakeholders that have awareness or experience of EAC markets, to what extent do you consider the principles outlined in Annex E to be reasonable and practicable for guiding the credible use of EACs toward achievement of science-based targets? (Select one)Note: Please do not consider carbon credits within the context of this question.

Respondent skipped this question

Q85

For “somewhat reasonable” or “not reasonable”, please explain.

Respondent skipped this question

Q86

To what extent do you agree or disagree that the integrity principles for Ongoing Emissions Responsibility Mitigation Impact Contributions (Annex E) provide sufficient guardrails to ensure the program drives additional climate action and reduces the risk of greenwashing? (Select one per row)

Ex-post delivery	Strongly agree
Robust quantification	Strongly agree
Additionality	Strongly agree
Transparency and disclosure	Strongly agree
Vintage	Strongly agree
Avoidance of leakage	Strongly agree
Risk of reversal safeguards	Strongly agree

Social and environmental safeguards	Strongly agree
Independent verification	Strongly agree
No double issuance or allocation	Strongly agree
Transparency of value distribution	Strongly agree

Q87

Are there any key gaps or missing principles that could strengthen the proposed integrity principles for Ongoing Emissions Responsibility Mitigation Impact contributions?

On human rights, the UN Guiding Principles should be named as a reference. This framework could also be used to strengthen and clarify many proposed requirements. For example, the requirement to phase-out the services to fossil industries could be defined (instead of revenue threshold) by classification from the UNGPs: cause, contribute or linked to.

Q88

To what extent do you agree or disagree that the integrity principles for Ongoing Emissions Responsibility Climate Finance Contributions presented in Annex B provide sufficient guardrails to ensure the program drives additional climate action and reduces the risk of greenwashing. (Select one per row)

Clear categorization and avoidance of double counting.	Strongly agree
Additionality.	Strongly agree
Credible pathway to climate impact.	Strongly agree
Delivery safeguards.	Strongly agree
Transparency.	Strongly agree
Environmental and social safeguards.	Strongly agree
Independent review.	Strongly agree
Temporal relevance.	Strongly agree

Q89

Are there any key gaps or missing principles that could strengthen the proposed integrity principles for Ongoing Emissions Responsibility Climate Finance contributions?

On human rights, the UN Guiding Principles should be named as a reference. This framework could also be used to strengthen and clarify many proposed requirements. For example, the requirement to phase-out the services to fossil industries could be defined (instead of revenue threshold) by classification from the UNGPs: cause, contribute or linked to.

Q90

To what extent do you agree or disagree that the proposed integrity principles for neutralization ensure credible, transparent, and verifiable claims at the net-zero target year?

Ex-post delivery	Strongly agree
Robust quantification	Strongly agree
Additionality	Strongly agree
Transparency and disclosure	Strongly agree
Vintage	Strongly agree
Avoidance of leakage	Strongly agree
Risk of reversal safeguards	Strongly agree
Social and environmental safeguards	Strongly agree
Independent verification	Strongly agree
No double issuance or allocation	Strongly agree

Transparency of value distribution	Strongly agree

Q91

Are there any key gaps or missing principles that could strengthen the proposed integrity principles for neutralization?

In line with ISO 14068 standard on carbon neutrality the requirement to avoid double claiming (with NDCs) should be included.

Q92

To what extent do you consider the integrity principles outlined in Annex E to be reasonable or unreasonable for each activity type? (Select one per row)

Mitigation Impact Contribution – Activities that reduce emissions from sources outside the company's value chain.	Very reasonable
Mitigation Impact Contribution – Activities that conserve, protect or enhance natural carbon sinks.	Very reasonable
Mitigation Impact Contribution – Activities that capture and store carbon in storage pools.	Very reasonable
Climate Finance Contribution – Ex-ante (forward-looking) mitigation funding.	Very reasonable
Climate Finance Contribution – Low/zero-carbon R&D and innovation funding.	Very reasonable
Climate Finance Contribution – Funding for mitigation-enabling outcomes.	Very reasonable
Climate Finance Contribution – Funding for adaptation and resilience outcomes.	Very reasonable
Climate Finance Contribution – Loss and damage finance.	Very reasonable
Neutralization Integrity Principles	Very reasonable

Page 12: Outreach and Communication Preferences

Q93

How did you find out about this Corporate Net-Zero Standard V2 Public Consultation?

SBTi newsletter

Q94

The SBTi would like to keep you informed about major milestones of the Corporate Net-Zero Standard V2, as well as other opportunities to provide feedback. Do you consent to being contacted by the SBTi for this purpose? (Select one)

Yes

Q95

If you do not already receive the SBTi newsletter, would you like to sign up to stay informed with the latest news from the SBTi?

Respondent skipped this question

Q96

How accessible did you find this survey?

Somewhat accessible

Q97

What other support or adaptations would help you participate effectively in Corporate Net-Zero Standard V2 public consultation?

There could've been a single text box in each segment to allow general remarks on the issues not covered by the questions.