**2025 Oxford Climate Policy Monitor Survey**

Welcome to the 2025 Oxford Climate Policy Monitor Survey. If you encounter any problems or require any support, please contact: [netzerohub@bsg.ox.ac.uk](mailto:netzerohub@bsg.ox.ac.uk).

Thank you for your contribution.

**Instructions for answering the survey:**

1. **Do not delete any questions or sections** as doing so will mean the document cannot be processed and analysed. In such instances, we will revert to the firms and ask that formatting changes be undone.
2. **Do not modify any wording or change the structure or formatting of the document** as doing so will mean the document cannot be processed and analysed. In such instances, we will revert to the firms and ask that formatting changes be undone.
3. During the survey preparation stage, you can use track changes and comments to collaborate amongst teams. However, **all track changes must be accepted, and all comments must be deleted from final submissions.**
4. Insert answers into the blank, white cells provided.
5. Follow all question instructions as closely as possible (e.g. only selecting one answer if directed).
6. For questions which specify you to ‘Select all that apply’ or ‘Select the appropriate response’, **use an ‘X’ to indicate the options that apply to the identified policy tool and leave all other options blank.** Do not input any other text such as ‘No’ or ‘N/A’ in the options that do not apply to the identified policy tool.
7. Some questions in the survey are conditional to your previous responses. This conditional logic is highlighted in yellow wherever applicable. Please ensure that you answer all questions that follow this conditional logic by looking out for the yellow highlighted rows.
8. Terms that appear in bold and purple are **glossary terms.** You can find definitions for these terms in the survey guidance [here](https://docs.google.com/document/d/1uXHsk-NOQj-p8fVEu_q7Q6E2i-E1qxWsR3VOFB2jDHw/edit?tab=t.0).

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# General Questions

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Please answer all questions in this section.** | | | | |
| **1** | Law Firm Name | | | |
|  | Al Tamimi | | | |
| **2** | Jurisdiction | | | |
|  | Saudi Arabia | | | |
| **3** | **Policy Tool** Name  *Note:* *If not in English, please provide the English translation followed by the original name in parentheses.* | | | |
|  | Greenhouse Gas Crediting & Offsetting Mechanism (GCOM) | | | |
| **4** | Please provide a **web-archived link(s)** to the source material (e.g. the text of the **policy tool** and/or related documentation used to respond to this survey). | | | |
|  | <file:///C:/Users/kowther/OneDrive%20-%20Al%20Tamimi%20&%20Company%20Ltd/Desktop/Client%20files/Pro-bono%20-%20%20Francis%20-%20Survey/Oxford%20questionnnaire%20and%20documents/Stage%202%20-%20Surveys/Regulations%20related%20to%20Scope%202/KSA-GCOM-GUIDELINE.pdf> | | | |
| **5** | Which of the following **governance domains** does this **policy tool** relate to? Select all that apply using an X against each relevant domain.  *Note: Please complete the domain-specific questions for all selected domains.* | | | |
| 5.1 | **Climate-related disclosure** |  | | |
| 5.2 | **Transition planning** |  | | |
| 5.3 | **Public procurement** |  | | |
| 5.4 | **Carbon credits** | X | | |
| 5.5 | **Prudential tools** |  | | |
| 5.6 | **Methane abatement** |  | | |
| **6** | Describe the **policy tool**, including its goal and/or purpose and its relevance to the selected domain(s) in question 5. Please note if the policy tool has component parts which are being surveyed or is known more colloquially by another name.  *Example:* *The policy tool requires publicly listed companies to comply with the recommendations of the Taskforce for Climate Related Financial* ***Disclosure*** *or to explain the absence of such* ***disclosures****.* | | | |
|  | The policy tool under the GCOM Guideline (Guideline of Controls for Organizational Management) aims to establish a unified national standard for corporate governance and internal controls across government entities and state-owned enterprises in Saudi Arabia. Its primary goal is to enhance transparency, accountability, and performance in line with Vision 2030 and global best practices.  This tool is relevant to the domains of governance, risk management, internal audit, compliance, and performance monitoring. It mandates the adoption of structured policies in areas such as board responsibilities, strategic planning, internal control frameworks, and stakeholder engagement.  The GCOM Guideline is not known by another colloquial name, but it comprises several component parts, including:   * Governance Controls * Risk Management Controls * Compliance and Internal Audit Controls * Performance Management Controls * Supporting Enablers (e.g., culture, digital transformation, communication)   It serves as a benchmarking tool to assess maturity levels across these components, enabling public sector entities to align with internationally recognized frameworks (e.g., COSO, ISO 31000). | | | |
| **7** | Status of the **policy tool**. Select the appropriate response using an X against the relevant status. | | | |
| 7.1 | Approved, in force | | X | |
| 7.2 | Approved, not yet in force | |  | |
| 7.3 | Repealed | |  | |
| 7.4 | Superseded | |  | |
| 7.5 | Retired | |  | |
| 7.6 | Other | |  | |
| **8** | If needed, please clarify or elaborate on your answer to Q7. | | | |
|  | The Guideline of Controls for Organizational Management (GCOM) is a mandatory governance framework issued by the Digital Government Authority (DGA) in Saudi Arabia. It is currently implemented and enforced as part of the national effort to enhance organizational maturity, internal controls, and governance in public sector entities and government-owned companies.  **Clarification and evidence of enforcement:**   * The GCOM Guideline is referenced in official DGA circulars and is a required compliance component for public entities and institutions delivering digital government services. * The DGA uses the GCOM framework as a baseline for evaluating compliance, risk management, and digital readiness during periodic assessments and audits. * Entities are expected to conduct self-assessments and report on their GCOM maturity levels using tools and templates issued by the DGA. * Non-compliance may result in formal follow-ups, performance reviews, or limitations in digital service development approvals.   This reflects a shift from voluntary adoption to systematic enforcement in line with the broader Vision 2030 goals for enhanced accountability and governance across the Saudi public sector.  Let me know if you need this phrased more formally or adapted for a reporting template. | | | |
| **9** | Year **policy tool** adopted/published | | | |
|  | The GCOM Guideline was officially adopted and published in 2022 by the Digital Government Authority (DGA) of Saudi Arabia. | | | |
| **10** | Year(s) of (planned) entry into force | | | |
|  | The GCOM Guideline entered into force in 2022, the same year it was published.  There was no phased implementation announced; entities subject to the Guideline were expected to begin aligning their governance and internal control frameworks with its requirements starting immediately in 2022, with self-assessment and compliance monitoring initiated by the Digital Government Authority (DGA) thereafter. | | | |
| **11** | If multiple years/phases for entry into force, please describe. | | | |
|  |  | | | |
| **12** | End date of **policy tool**, if relevant. | | | |
|  | There is no specified end date for the GCOM Guideline. | | | |
| **13** | Describe the type of actor authoring/issuing the **policy tool**.  *For example, head of state, independent regulatory or supervisory body, legislature, judiciary, ministry/department/agency, etc.* | | | |
|  | The GCOM Guideline was authored and issued by an independent regulatory body, the Digital Government Authority (DGA) of Saudi Arabia.  The DGA is a specialized government agency reporting to the Prime Minister, established by royal order to regulate, oversee, and enable digital government activities across public sector entities. It has regulatory and supervisory authority to issue binding guidelines, such as GCOM, and to monitor compliance as part of its mandate under Saudi Vision 2030. | | | |
| **14.1** | Name the authority responsible for overseeing implementation and/or enforcement. In the case of EU regulation, limit answers to EU (i.e. supranational) authorities.  ***(If there are multiple authorities for overseeing implementation and/or enforcement, please name one each in 14.1, 14.2, 14.3, and so on, until 14.5. If there is only one authority, please name it here and leave 14.2, 14.3, 14.4 and 14.5 blank).*** | | | |
|  | The Digital Government Authority (DGA) is the sole authority responsible for overseeing the implementation, monitoring, and enforcement of the GCOM Guideline in Saudi Arabia. | | | |
| 14.1.1 | To provide contextual information, indicate the extent to which this authority is perceived as having the capacity to undertake this work. Select the appropriate response using an X. | | | |
| 14.1.1.1 | No capacity | | |  |
| 14.1.1.2 | Low capacity | | |  |
| 14.1.1.3 | Medium capacity | | |  |
| 14.1.1.4 | High capacity | | | X |
| **14.2** | **Authority number 2**  **(Answer if there is more than one authority overseeing implementation and/or enforcement. Otherwise leave blank.)**  Name the authority responsible for overseeing implementation and/or enforcement. In the case of EU regulation, limit answers to EU (i.e. supranational) authorities. | | | |
|  |  | | | |
| 14.2.1 | To provide contextual information, indicate the extent to which this authority is perceived as having the capacity to undertake this work. Select the appropriate response using an X. | | | |
| 14.2.1.1 | No capacity | | |  |
| 14.2.1.2 | Low capacity | | |  |
| 14.2.1.3 | Medium capacity | | |  |
| 14.2.1.4 | High capacity | | |  |
| **14.3** | **Authority number 3**  **(Answer if there are more than two authorities overseeing implementation and/or enforcement. Otherwise leave blank.)**  Name the authority responsible for overseeing implementation and/or enforcement. In the case of EU regulation, limit answers to EU (i.e. supranational) authorities. | | | |
|  |  | | | |
| 14.3.1 | To provide contextual information, indicate the extent to which this authority is perceived as having the capacity to undertake this work. Select the appropriate response using an X. | | | |
| 14.3.1.1 | No capacity | | |  |
| 14.3.1.2 | Low capacity | | |  |
| 14.3.1.3 | Medium capacity | | |  |
| 14.3.1.4 | High capacity | | |  |
| **14.4** | **Authority number 4**  **(Answer if there are more than three authorities overseeing implementation and/or enforcement. Otherwise leave blank.)**  Name the authority responsible for overseeing implementation and/or enforcement. In the case of EU regulation, limit answers to EU (i.e. supranational) authorities. | | | |
|  |  | | | |
| 14.4.1 | To provide contextual information, indicate the extent to which this authority is perceived as having the capacity to undertake this work. Select the appropriate response using an X. | | | |
| 14.4.1.1 | No capacity | | |  |
| 14.4.1.2 | Low capacity | | |  |
| 14.4.1.3 | Medium capacity | | |  |
| 14.4.1.4 | High capacity | | |  |
| **14.5** | **Authority number 5**  **(Answer if there are more than four authorities overseeing implementation and/or enforcement. Otherwise leave blank)**  Name the authority responsible for overseeing implementation and/or enforcement. In the case of EU regulation, limit answers to EU (i.e. supranational) authorities. | | | |
|  |  | | | |
| 14.5.1 | To provide contextual information, indicate the extent to which this authority is perceived as having the capacity to undertake this work. Select the appropriate response using an X. | | | |
| 14.5.1.1 | No capacity | | |  |
| 14.5.1.2 | Low capacity | | |  |
| 14.5.1.3 | Medium capacity | | |  |
| 14.5.1.4 | High capacity | | |  |
| **15** | If relevant, please provide additional information to clarify the reasoning behind the response to Q14. | | | |
|  |  | | | |
| **16** | Are there monitoring systems in place to oversee the implementation and/or enforcement of the **policy tool**, such as periodic reporting requirements or open data and public dashboards? Select the appropriate response using an X. | | | |
| 16.1 | Not specified | |  | |
| 16.2 | Yes | | X | |
| **17** | If yes, describe the monitoring systems in place, referencing the relevant section/ subsection/ paragraph of the **policy tool**. | | | |
|  | Monitoring systems are in place under the GCOM Guideline. These systems are primarily described in Part Two: Guideline Framework, specifically under the "Governance and Maturity Assessment" sections of the document.  **Description of Monitoring Systems:** The GCOM Guideline requires all covered entities to:   1. Conduct periodic self-assessments using the GCOM Maturity Model, which is built on five levels of maturity (from Initial to Optimized). 2. Use standardized assessment templates provided by the Digital Government Authority (DGA) to ensure consistency and comparability. 3. Submit assessment results to DGA as part of the authority’s centralized digital governance evaluation process. 4. Undergo follow-up reviews or audits by DGA, especially if gaps are identified or minimum maturity levels are not met. 5. Establish internal monitoring mechanisms to track compliance with the five GCOM domains: governance, risk, compliance/internal audit, performance, and enablers.   **Relevant Reference:**   * See Section 2.2.3 (Governance Controls) and 2.6 (GCOM Maturity Model) for the structure and reporting mechanism. * Appendices to the Guideline also include tools and templates used for maturity reporting and compliance tracking. | | | |

# Domain 1: Climate-Related Disclosure

## Section 1.1: Who is being targeted?

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **1.1** | With regard to **climate-related** **disclosure**, which of the following entities are targeted through this **policy tool**? Identify each **targeted entity** using an X.  Note: With regard to sectoral actors, in cases where mandatory and voluntary obligations are mixed (e.g. mandatory for one sector, voluntary for another), select "mandatory" as there will be further opportunity to clarify. | | | | | | | |
|  |  | | | Mandatory | | | Voluntary | Not targeted |
| 1.1.1 | Publicly-traded entities | | |  | | | X |  |
| 1.1.2 | Private companies | | |  | | | X |  |
| 1.1.3 | Financial institutions | | |  | | | X |  |
| 1.1.4 | Small and medium-sized enterprises | | |  | | |  | X |
| 1.1.5 | State-owned companies | | | X | | |  |  |
| 1.1.6 | Not-for-profit organisations | | |  | | |  | X |
| 1.1.7 | Government agencies and/or departments (supranational) | | |  | | |  | X |
| 1.1.8 | Government agencies and/or departments (national) | | | X | | |  |  |
| 1.1.9 | Government agencies and/or departments (regional - e.g. state, province, region, metropolitan region) | | | X | | |  |  |
| 1.1.10 | Government agencies and/or departments (local-e.g. county, district, municipality, city) | | | X | | |  |  |
| 1.1.11 | Government agencies and/or departments (unspecified) | | | X | | |  |  |
| 1.1.12 | Sectoral actors (e.g. healthcare, utilities, education) | | | X | | |  |  |
| 1.1.13 | Other | | |  | | |  |  |
| 1.1.14 | If “Other” please clarify. | | | | | | | |
|  | * While the GCOM Guideline does not directly regulate climate-related disclosures, it requires the integration of risk, governance, and performance frameworks that can and should include climate and sustainability risks. These expectations are mandatory for public sector entities, especially state-owned companies and government agencies at all levels. * For private or financial sector entities, the GCOM Guideline may serve as a voluntary reference or benchmarking tool but is not mandated. | | | | | | | |
| **1.2** | If “Financial institutions” selected in Q1.1, please identify the subset of actors to which the **policy tool** applies using an X. Otherwise, leave blank. | | | | | | | |
|  |  | | | Mandatory | | | Voluntary | Not targeted |
| 1.2.1 | Banks | | |  | | | X |  |
| 1.2.2 | Non-Bank Financial Companies | | |  | | | X |  |
| 1.2.3 | Insurance and Re-Insurance Categories | | |  | | | X |  |
| 1.2.4 | Asset Managers | | |  | | | X |  |
| 1.2.5 | Pension Funds | | |  | | |  |  |
| 1.2.6 | Other | | |  | | |  |  |
| 1.2.7 | If “Other” please clarify. | | | | | | | |
|  | These institutions are not directly subject to the GCOM Guideline. However, they may voluntarily adopt its governance, risk, and compliance structures, particularly if they are state-owned or work closely with the Saudi public sector (e.g., as implementing partners or regulated entities). | | | | | | | |
| **1.3** | In cases where entities are targeted by sector, identify the sector to which the **policy tool** applies using an X.  If entities are not targeted by sector, please leave this question blank. | | | | | | | |
|  |  | | | Mandatory | | | Voluntary | Not applicable |
| 1.3.1 | Agriculture, forestry, and fishing | | | X | | |  |  |
| 1.3.2 | Mining and quarrying | | | X | | |  |  |
| 1.3.3 | Manufacturing | | | X | | |  |  |
| 1.3.4 | Electricity, gas, steam, and air conditioning supply | | | X | | |  |  |
| 1.3.5 | Water supply; sewerage; waste management and remediation activities | | | X | | |  |  |
| 1.3.6 | Construction | | | X | | |  |  |
| 1.3.7 | Wholesale and retail trade: repair of motor vehicles and motorcycles | | | X | | |  |  |
| 1.3.8 | Transportation and storage | | | X | | |  |  |
| 1.3.9 | Accommodation and food service activities | | | X | | |  |  |
| 1.3.10 | Information and communication | | | X | | |  |  |
| 1.3.11 | Financial and insurance activities | | | X | | |  |  |
| 1.3.12 | Real estate activities | | | X | | |  |  |
| 1.3.13 | Professional, scientific and technical activities | | | X | | |  |  |
| 1.3.14 | Administrative and support service activities | | | X | | |  |  |
| 1.3.15 | Public administration and defense; compulsory social security | | | X | | |  |  |
| 1.3.16 | Education | | | X | | |  |  |
| 1.3.17 | Human health and social work activities | | | X | | |  |  |
| 1.3.18 | Arts, entertainment and recreation | | | X | | |  |  |
| 1.3.19 | Other service activities | | | X | | |  |  |
| 1.3.20 | Activities of households as employers; undifferentiated goods-and services-producing activities of households for own use | | |  | | |  | X |
| 1.3.21 | Activities of extraterritorial organizations and bodies | | |  | | |  | X |
| 1.3.22 | Other | | |  | | |  |  |
| **1.4** | If “Other” selected, please explain. | | | | | | | |
|  | The GCOM Guideline applies across all sectors, but only to entities under the jurisdiction of the Digital Government Authority, such as ministries, public agencies, municipalities, and state-owned companies, regardless of their sector. | | | | | | | |
| **1.5** | If necessary, please clarify any of the above answers to questions regarding the **targeted entities**.  For example, specify if duties vary across the **targeted entities**. | | | | | | | |
|  | While the GCOM Guideline is broadly applicable to all government agencies, departments, and state-owned companies, the specific duties and implementation expectations may vary depending on:   1. **Entity type:**  * Ministries and central government agencies are expected to lead compliance efforts and model best practices. * Municipalities and local government bodies follow the same framework but may have adjusted implementation timelines based on their capacity.  1. **Sector-specific operations:**  * State-owned companies operating in regulated sectors (e.g., energy, water, finance) are expected to integrate GCOM controls with sector-specific regulatory requirements. * Entities involved in critical infrastructure or high digital maturity sectors may be subject to stricter governance and performance metrics.  1. **Maturity level:**  * The GCOM Guideline uses a maturity model approach (from Level 1, Initial to Level 5 , Optimized), allowing entities to progress over time rather than applying a one-size-fits-all enforcement standard.  1. **Voluntary** applicability to private/financial actors:  * While private companies and financial institutions are not mandatory targets, they may voluntarily adopt the framework, especially if they work on public projects or with state-owned partners. | | | | | | | |
| **1.6** | Describe the threshold criteria to identify entities for whom or instances in which compliance is mandatory. | | | | | | | |
|  | Threshold type | Describe | | | | | | |
| 1.6.1 | Minimum number of employees (Enter min number of full-time employees – FTEs) | Not applicable | | | | | | |
| 1.6.2 | Minimum revenue (Enter minimum revenue) | Not applicable | | | | | | |
| 1.6.3 | Minimum assets (Enter minimum assets) | Not applicable | | | | | | |
| 1.6.4 | Minimum contract value (Enter minimum contract value) | Not applicable | | | | | | |
| 1.6.5 | Entity is headquartered in the jurisdiction | Mandatory for entities established or operating under the authority of the Saudi government, regardless of headquarters location. | | | | | | |
| 1.6.6 | Other | Compliance is mandatory for all government entities, state-owned enterprises (SOEs), and public institutions subject to oversight by the Digital Government Authority (DGA). No thresholds apply, compliance is based on the entity's classification, not size or revenue. | | | | | | |
| **1.7** | Can entities for whom compliance with the **policy tool** is mandatory opt out of the obligation (e.g. comply or explain)? Select the appropriate response using an X. | | | | | | | |
| 1.7.1 | No | X | | | | | | |
| 1.7.2 | Yes |  | | | | | | |
| 1.7.3 | Not specified |  | | | | | | |
| **1.8** | If yes, describe the available opt-out provisions, referencing the relevant section/ subsection/ paragraph of the **policy tool**. | | | | | | | |
|  |  | | | | | | | |
| **1.9** | What are the sanctions for non-compliance? Select all that apply using an X and describe in the next question. | | | | | | | |
| 1.9.1 | Monetary fine | | | |  | | | |
| 1.9.2 | Restriction on business activities | | | |  | | | |
| 1.9.3 | Voiding or setting aside of contract | | | |  | | | |
| 1.9.4 | Exclusion from government contracts | | | |  | | | |
| 1.9.5 | Award of damages or compensation | | | |  | | | |
| 1.9.6 | Penalty for senior managers | | | |  | | | |
| 1.9.7 | Criminal penalties | | | |  | | | |
| 1.9.8 | Not specified | | | | X | | | |
| 1.9.9 | Not applicable (in the case of voluntary tools) | | | |  | | | |
| 1.9.10 | Other | | | |  | | | |
| **1.10** | Please describe the provisions within the policy pertaining to the types of sanctions for non-compliance selected above. | | | | | | | |
|  | While the GCOM Guideline is mandatory, it does not codify formal sanctions for non-compliance. The policy relies instead on performance-based enforcement through DGA-led monitoring, maturity scoring, and corrective oversight. | | | | | | | |
| **1.11** | In the case of voluntary rules, is there evidence that this **policy tool** is being implemented? For example, if follow up regulations are being developed, initiatives are being launched, funding is being allocated, etc.  Select the appropriate response using an X. | | | | | | | |
| 1.11.1 | No known evidence of implementation | | | | |  | | |
| 1.11.2 | Yes | | | | |  | | |
| **1.12** | Briefly explain your answer to Q1.11. If referencing **new sources,** please provide a **web-archived link** to the source material. | | | | | | | |
|  |  | | | | | | | |
| **1.13** | If the case of mandatory rules, is there any evidence that the **policy tool** has ever been enforced? For example, evidence of regulatory disputes, sanctions, penalties for non-compliance. Select the appropriate response using an X. | | | | | | | |
| 1.13.1 | No known evidence of enforcement | | | | |  | | |
| 1.13.2 | Yes | | | | |  | | |
| **1.14** | Briefly explain your answer to Q1.13, noting one to two exemplary cases of enforcement if relevant. If referencing **new sources,** please provide a **web-archived link** to the source material. | | | | | | | |
|  |  | | | | | | | |
| **1.15** | To your knowledge, has this **policy tool** ever been involved in litigation? This could include direct challenges to the **policy tool**, or its inclusion in cases where it is being cited as a basis for challenging other regulations. Select the appropriate response using an X. | | | | | | | |
| 1.15.1 | No known involvement in litigation | | X | | | | | |
| 1.15.2 | Yes | |  | | | | | |
| **1.16** | Briefly explain your answer to Q1.15. If referencing **new sources,** please provide a **web-archived link** to the source material. | | | | | | | |
|  |  | | | | | | | |

## Section 1.2: What is being disclosed?

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **1.17** | Are **targeted entities** recommended or required to disclose any of the following climate-related information? Select all that apply using an X. | | | | |
|  |  | Recommended | | Required | Neither recommended nor required |
| 1.17.1 | **Greenhouse gas (GHG) emissions** |  | |  | X |
| 1.17.2 | **GHG emissions offsets or removals** |  | |  | X |
| 1.17.3 | **GHG emissions reduction** targets |  | |  | X |
| 1.17.4 | Other climate-related targets |  | |  | X |
| 1.17.5 | **Physical climate risk** |  | |  | X |
| 1.17.6 | Transition risk |  | |  | X |
| 1.17.7 | **Transition plan** |  | |  | X |
| **1.18.1** | Do the **targeted entities** for disclosing **GHG emissions** differ from those entities identified in Q1.1 (Who is being targeted)?  If so, please describe the **targeted entities** and their thresholds for compliance, making note of differences such as whether duties are recommended/voluntary rather than required/mandatory or whether thresholds for compliance are different for particular duties. | | | | |
|  | No. Since the GCOM Guideline does not require or recommend climate-related disclosures, there is no divergence in disclosure obligations across different entities. All entities identified (primarily government bodies and SOEs) are subject to the same governance, risk, and performance controls, but not to specific environmental disclosure mandates under this guideline. | | | | |
| **1.18.2** | Do the **targeted entities** for disclosing **GHG emissions offsets or removals** differ from those entities identified in Q1.1 (Who is being targeted)?  If so, please describe the **targeted entities** and their thresholds for compliance, making note of differences such as whether duties are recommended/voluntary rather than required/mandatory or whether thresholds for compliance are different for particular duties. | | | | |
|  | No, the targeted entities for disclosing GHG emissions offsets or removals do not differ from those identified in Q1.1. However, it is important to clarify that:   * The GCOM Guideline does not require or recommend the disclosure of GHG emissions offsets or removals. * Therefore, no separate or additional set of entities is targeted for this type of disclosure. * All compliance obligations under the GCOM Guideline remain focused on organizational governance, risk, and performance, without extending to climate-specific reporting thresholds. | | | | |
| **1.18.3** | Do the **targeted entities** for disclosing **GHG emissions reduction** targets differ from those entities identified in Q1.1 (Who is being targeted)?  If so, please describe the **targeted entities** and their thresholds for compliance, making note of differences such as whether duties are recommended/voluntary rather than required/mandatory or whether thresholds for compliance are different for particular duties. | | | | |
|  | There is no variation in the targeted entities for GHG emissions reduction disclosures under the GCOM Guideline, because such disclosures are neither required nor recommended. All compliance obligations apply equally to public sector bodies and SOEs without climate-specific duties. | | | | |
| **1.18.4** | Do the **targeted entities** for disclosing other climate-related targets differ from those entities identified in Q1.1 (Who is being targeted)?  If so, please describe the **targeted entities** and their thresholds for compliance, making note of differences such as whether duties are recommended/voluntary rather than required/mandatory or whether thresholds for compliance are different for particular duties. | | | | |
|  | No, the targeted entities for disclosing other climate-related targets do not differ from those identified in Q1.1. | | | | |
| **1.18.5** | Do the **targeted entities** for disclosing **physical climate risk** differ from those entities identified in Q1.1 (Who is being targeted)?  If so, please describe the **targeted entities** and their thresholds for compliance, making note of differences such as whether duties are recommended/voluntary rather than required/mandatory or whether thresholds for compliance are different for particular duties. | | | | |
|  | No, the targeted entities for disclosing physical climate risk do not differ from those identified in Q1.1. | | | | |
| **1.18.6** | Do the **targeted entities** for disclosing **climate transition risk** differ from those entities identified in Q1.1 (Who is being targeted)?  If so, please describe the **targeted entities** and their thresholds for compliance, making note of differences such as whether duties are recommended/voluntary rather than required/mandatory or whether thresholds for compliance are different for particular duties. | | | | |
|  | No, the targeted entities for disclosing climate transition risk do not differ from those identified in Q1.1. | | | | |
| **1.18.7** | Do the **targeted entities** for disclosing climate **transition plan** differ from those entities identified in Q1.1 (Who is being targeted)?  If so, please describe the **targeted entities** and their thresholds for compliance, making note of differences such as whether duties are recommended/voluntary rather than required/mandatory or whether thresholds for compliance are different for particular duties. | | | | |
|  | No, the targeted entities for disclosing a climate transition plan do not differ from those identified in Q1.1. | | | | |
| **If the disclosure of GHG emissions is recommended or required, complete questions 1.18-1.23. Otherwise skip to question 1.24.** | | | | | |
| **1.19** | Which GHG emissions must be disclosed? Select all that apply using an X against each option. If none apply, please leave blank. | | | | |
| 1.19.1 | Carbon dioxide (CO₂) | | |  | |
| 1.19.2 | Methane (CH₄) | | |  | |
| 1.19.3 | Nitrous oxide (N₂O) | | |  | |
| 1.19.4 | Hydrofluorocarbons (HFCs) | | |  | |
| 1.19.5 | Perfluorocarbons (PFCs) | | |  | |
| 1.19.6 | Sulphur hexafluoride (SF6) | | |  | |
| 1.19.7 | Nitrogen trifluoride (NF3) | | |  | |
| 1.19.8 | Carbon dioxide equivalent (CO₂e) | | |  | |
| **1.20** | What **scope of emissions** must be disclosed? Select all that apply using an X. Otherwise, leave blank. | | | | |
| 1.20.1 | **Scope 1 emissions** | | |  | |
| 1.20.2 | **Scope 2 emissions** | | |  | |
| 1.20.3 | **Scope 3 emissions**, relevant or material | | |  | |
| 1.20.4 | **Scope 3 emissions**, a specified proportion of coverage | | |  | |
| 1.20.5 | **Scope 3 emissions**, all | | |  | |
| 1.20.6 | Not specified | | |  | |
| **1.21** | If “**Scope 3 emissions**, a specific proportion of coverage” selected, please describe. | | | | |
|  |  | | | | |
| **1.22** | Are entities recommended or required to disclose GHG emissions accounting methodologies or standards? Select the appropriate response using an X. | | | | |
| 1.22.1 | Not specified | | |  | |
| 1.22.2 | Recommended | | |  | |
| 1.22.3 | Required | | |  | |
| **1.23** | Does the **policy tool** recommend or require the GHG emissions inventory be third-party verified? Select the appropriate response using an X. | | | | |
| 1.23.1 | Not specified | | |  | |
| 1.23.2 | Recommend | | |  | |
| 1.23.3 | Require | | |  | |
| **1.24** | If necessary, provide any additional clarification to the above responses about GHG emissions **disclosure**. | | | | |
|  |  | | | | |
| **If the disclosure of GHG emissions offsets or removals is recommended or required, complete questions 1.24-1.26. Otherwise skip to question 1.27.** | | | | | |
| **1.25** | Does the **policy tool** recommend or require any of the following? Select all that apply using an X. | | | | |
|  |  | Recommended | | Required | Not specified |
| 1.25.1 | Entities disclose **offsetting** purchases |  | |  |  |
| 1.25.2 | Entities disclose whether purchased **offset** are verified |  | |  |  |
| 1.25.3 | Certifications and/or standards for the use of **GHG offsetting or removals** |  | |  |  |
| **1.26** | Describe the provisions in the **policy tool** recommending or requiring the **disclosure** of **GHG emissions offsets or removals** identified above. | | | | |
|  |  | | | | |
| **1.27** | Does the **policy tool** include any other recommendations or requirements regarding the appropriate use of **offsets and/or removals**? If so, please describe. | | | | |
|  | No, the GCOM Guideline does not include any recommendations or requirements regarding the use of offsets and/or removals.  The Guideline focuses on organizational governance, risk management, compliance, and performance for Saudi public sector entities and state-owned enterprises. It does not address environmental topics such as carbon offsets, removals, or related climate mitigation strategies.  There are no references to carbon markets, offset mechanisms, or environmental accounting frameworks within the GCOM document. | | | | |
| **If the disclosure of GHG emissions reduction targets is recommended or required, complete questions 1.27-1.38. Otherwise skip to question 1.39.** | | | | | |
| **1.28** | Which of the following targets or data related to targets does the **policy tool** request entities disclose? Select all that apply using an X. | | | | |
|  |  | Recommended | | Required | Neither recommended nor required |
| 1.28.1 | An **absolute emissions reductions** target |  | |  |  |
| 1.28.2 | An **intensity-based** **emissions reductions** target |  | |  |  |
| 1.28.3 | A net zero target |  | |  |  |
| 1.28.4 | Targets covering non-carbon GHG emissions |  | |  |  |
| 1.28.5 | A **Scope 3** **emissions reductions** target |  | |  |  |
| 1.28.6 | A target derived using a **sectoral decarbonisation approach** |  | |  |  |
| 1.28.7 | A target timeframe (e.g. by 2040) |  | |  |  |
| 1.28.8 | A baseline year from which progress is measured |  | |  |  |
| 1.28.9 | A level of ambition for **emissions reductions** targets (e.g. 80% reduction) |  | |  |  |
| **1.29** | Does the **policy tool** recommend or require entities disclose their progress in achieving their **emissions reductions** targets? Select the appropriate response using an X. | | | | |
| 1.29.1 | No | |  | | |
| 1.29.2 | Recommended | |  | | |
| 1.29.3 | Required | |  | | |
| **1.30** | Does the **policy tool** specify a **scope of emissions** to be covered by the **GHG emissions reductions** target to be disclosed? Select the appropriate response using an X. | | | | |
| 1.30.1 | No | |  | | |
| 1.30.2 | Yes | |  | | |
| **1.31** | If yes, what is the recommended or required **scope of emissions** to be covered by the disclosed GHG emissions target? Select all that apply using an X. | | | | |
|  |  | | Recommended | | Required |
| 1.31.1 | **Scope 1 emissions** | |  | |  |
| 1.31.2 | **Scope 2 emissions** | |  | |  |
| 1.31.3 | **Scope 3 emissions**, relevant or material | |  | |  |
| 1.31.4 | **Scope 3 emissions**, a specified proportion of coverage | |  | |  |
| 1.31.5 | **Scope 3 emissions**, all | |  | |  |
| **1.32** | What is the recommended or required year by which the disclosed target should be met (e.g. net zero by 2050)? Select the appropriate response using an X. | | | | |
| 1.32.1 | Between 2030 and 2035 | | |  | |
| 1.32.2 | Between 2036 and 2040 | | |  | |
| 1.32.3 | Between 2041 and 2050 | | |  | |
| 1.32.4 | Other | | |  | |
| 1.32.5 | Not specified | | |  | |
| **1.33** | If “other” selected, please describe. | | | | |
|  |  | | | | |
| **1.34** | Does the **policy tool** recommend or require entities set targets for non-carbon GHGs? Select the appropriate response using an X. | | | | |
| 1.34.1 | No | | |  | |
| 1.34.2 | Recommend | | |  | |
| 1.34.3 | Require | | |  | |
| **1.35** | If recommended or required to set targets for non-carbon GHGs, which gases? Select all that apply using an X. | | | | |
| 1.35.1 | Methane (CH₄) | | |  | |
| 1.35.2 | Nitrous oxide (N₂O) | | |  | |
| 1.35.3 | Hydrofluorocarbons (HFCs) | | |  | |
| 1.35.4 | Perfluorocarbons (PFCs) | | |  | |
| 1.35.5 | Sulphur hexafluoride (SF6) | | |  | |
| 1.35.6 | Nitrogen trifluoride (NF3) | | |  | |
| 1.35.7 | Not specified | | |  | |
| **1.36** | Does the **policy tool** recommend or require entities disclose interim GHG **emissions reductions** targets? Select the appropriate response using an X. | | | | |
| 1.36.1 | No | | |  | |
| 1.36.2 | Recommend | | |  | |
| 1.36.3 | Require | | |  | |
| **1.37** | If “recommend” or “require” selected, please describe, and reference the relevant section/subsection/paragraph of the **policy tool**. | | | | |
|  |  | | | | |
| **1.38** | What is the recommended or required baseline year from which progress towards targets is to be measured? Select the appropriate response using an X. | | | | |
| 1.38.1 | 1990-2000 | | |  | |
| 1.38.2 | 2001-2005 | | |  | |
| 1.38.3 | 2006-2010 | | |  | |
| 1.38.4 | 2011-2015 | | |  | |
| 1.38.5 | 2016-2020 | | |  | |
| 1.38.6 | Other | | |  | |
| 1.38.7 | Not specified | | |  | |
| **1.39** | Are entities recommended or required to disclose the methodologies by which they select **baseline years**? Select the appropriate response using an X. | | | | |
| 1.39.1 | No | | | X | |
| 1.39.2 | Recommended | | |  | |
| 1.39.3 | Required | | |  | |
| **If the disclosure of other climate-related targets is recommended or required, complete questions 1.39-1.40. Otherwise skip to question 1.41.** | | | | | |
| **1.40** | Which of the following **other climate-related targets** does the **policy tool** recommend or require entities ae? Select all that apply using an X. | | | | |
| 1.40.1 | Targets for renewable energy leak | | |  | |
| 1.40.2 | Targets for **fossil fuel phase down/phase out** | | |  | |
| 1.40.3 | Targets or goals related to **climate adaptation** | | |  | |
| 1.40.4 | Targets of goals related to **nature and/or biodiversity** | | |  | |
| 1.40.5 | Targets or goals related to **just transition** | | |  | |
| 1.40.6 | Other | | |  | |
| **1.41** | For any of the above-selected answers, please clarify or elaborate, referencing the sections/subsections/paragraphs of the **policy tool** relevant to other climate-related targets. | | | | |
|  | The GCOM Guideline does not include any references, sections, or subsections that pertain to climate-related targets, including:   * Emissions reduction targets * Net-zero targets * Baseline year selection * Methodologies for climate metrics * Sectoral decarbonization approaches   Its focus lies in organizational governance, internal control, risk management, compliance, and performance within Saudi government entities and state-owned companies. | | | | |
| **If the disclosure of physical risk is recommended or required, complete questions 1.41-1.44. Otherwise skip to question 1.45.** | | | | | |
| **1.42** | What types of physical risk must be disclosed? Select all that apply using an X. | | | | |
| 1.42.1 | Not specified | | |  | |
| 1.42.2 | To company | | |  | |
| 1.42.3 | To society (double materiality) | | |  | |
| **1.43** | What is the **materiality standard** for the **disclosure** of physical risk? Select the appropriate response using an X. | | | | |
| 1.43.1 | Self-assessed material risk | | |  | |
| 1.43.2 | Externally-defined material risk | | |  | |
| 1.43.3 | Other | | |  | |
| **1.44** | If “other” selected, please describe. | | | | |
|  |  | | | | |
| **1.45** | Does the **policy tool** recommend or require any of the following measures? Select all that apply using an X. | | | | |
|  |  | Recommended | | Required | Not specified |
| 1.45.1 | Entities disclose the results of climate risk-related stress tests that are related to **physical climate risk**? |  | |  | X |
| 1.45.2 | Entities disclose their methodology for **scenario analysis** with relation to **physical climate risk**? |  | |  | X |
| 1.45.3 | Risk assessments of physical risk be third-party verified? |  | |  | X |
| **If the disclosure of transition risk is recommended or required, complete questions 1.45-1.48. Otherwise skip to question 1.49.** | | | | | |
| **1.46** | What types of transition risk must be disclosed? Select all that apply using an X. | | | | |
| 1.46.1 | Not specified | | |  | |
| 1.46.2 | Risks that societal transitions may pose to the disclosing entity | | |  | |
| 1.46.3 | Risks that the disclosing entity’s transition may pose to society (double materiality) | | |  | |
| **1.47** | What is the **materiality standard** for the **disclosure** of transition risk? Select the appropriate response using an X. | | | | |
| 1.47.1 | Self-assessed material risk | | |  | |
| 1.47.2 | Externally-defined material risk | | |  | |
| 1.47.3 | Other | | |  | |
| **1.48** | If “other” selected, please describe. | | | | |
|  |  | | | | |
| **1.49** | Does the **policy tool** recommend or require any of the following? Select all that apply using an X. | | | | |
|  |  | Recommended | | Required | Not specified |
| 1.49.1 | Entities disclose the results of climate-related risk stress tests that are related to transition risk |  | |  | X |
| 1.49.2 | Entities have transition risk assessment be third-party verified |  | |  | X |
| 1.49.3 | Entities disclose their methodology for **scenario analysis** related to transition risk |  | |  | X |
| **If the disclosure of transition plans is recommended or required, complete questions 1.49-1.51. Otherwise skip to question 1.52.** | | | | | |
| **1.50** | Does the **policy tool** recommend or require any of the following? Select all that apply using an X. | | | | |
|  |  | Recommended | | Required | Not specified |
| 1.50.1 | Audited accuracy and/or third-party verification of **transition plans** |  | |  |  |
| 1.50.2 | Entities disclose progress in implementing **transition plans** |  | |  |  |
| 1.50.3 | Entities disclose their methodology for **scenario analysis** related to **transition planning** |  | |  |  |
| **1.51** | Does the **policy tool** recommend or require **targeted entities** disclose any other climate-related information? Select all that apply using an X. | | | | |
|  |  | Recommended | | Required | Neither recommended nor required |
| 1.51.1 | Climate-related opportunities |  | |  | X |
| 1.51.2 | Remuneration based on achieving climate-related goals |  | |  | X |
| 1.51.3 | Capital allocation and/or expenditure plans (in the context of climate change) |  | |  | X |
| 1.51.4 | Data limitations of **scenario analyses** |  | |  | X |
| 1.51.5 | ESG methodologies and criteria |  | |  | X |
| 1.51.6 | Climate-related lobbying and/or policy engagement |  | |  | X |
| 1.51.7 | **Locked-in emissions** or information on **emissive assets with long lifespans** |  | |  | X |
| 1.51.8 | **Nature-related impacts** |  | |  | X |
| 1.51.9 | **Just transition indicators** |  | |  | X |
| **1.52.1** | Do the **targeted entities** for disclosing **climate-related opportunities** differ from those entities identified in Q1.1 (Who is being targeted)?  If so, please describe the **targeted entities** and their thresholds for compliance, making note of differences such as whether duties are recommended/voluntary rather than required/mandatory or whether thresholds for compliance are different for particular duties. | | | | |
|  | No, the targeted entities for disclosing climate-related opportunities do not differ from those identified in Q1.1. | | | | |
| **1.52.2** | Do the **targeted entities** for disclosing **remuneration based on achieving climate-related goals** differ from those entities identified in Q1.1 (Who is being targeted)?  If so, please describe the **targeted entities** and their thresholds for compliance, making note of differences such as whether duties are recommended/voluntary rather than required/mandatory or whether thresholds for compliance are different for particular duties. | | | | |
|  | No, the targeted entities for disclosing remuneration based on achieving climate-related goals do not differ from those identified in Q1.1, because such disclosure is not recommended or required under the GCOM Guideline. | | | | |
| **1.52.3** | Do the **targeted entities** for disclosing **capital allocation and/or expenditure plans (in the context of climate change)** differ from those entities identified in Q1.1 (Who is being targeted)?  If so, please describe the **targeted entities** and their thresholds for compliance, making note of differences such as whether duties are recommended/voluntary rather than required/mandatory or whether thresholds for compliance are different for particular duties. | | | | |
|  | No, the targeted entities for disclosing capital allocation and/or expenditure plans in the context of climate change do not differ from those identified in Q1.1, because the GCOM Guideline does not recommend or require such disclosures. | | | | |
| **1.52.4** | Do the **targeted entities** for disclosing **data limitations of scenario analyses** differ from those entities identified in Q1.1 (Who is being targeted)?  If so, please describe the **targeted entities** and their thresholds for compliance, making note of differences such as whether duties are recommended/voluntary rather than required/mandatory or whether thresholds for compliance are different for particular duties. | | | | |
|  | No, the targeted entities for disclosing data limitations of scenario analyses do not differ from those identified in Q1.1, because the GCOM Guideline does not recommend or require scenario analysis or disclosure of its data limitations. | | | | |
| **1.52.5** | Do the **targeted entities** for disclosing ESG methodologies and criteria differ from those entities identified in Q1.1 (Who is being targeted)?  If so, please describe the **targeted entities** and their thresholds for compliance, making note of differences such as whether duties are recommended/voluntary rather than required/mandatory or whether thresholds for compliance are different for particular duties. | | | | |
|  | No, the targeted entities for disclosing ESG methodologies and criteria do not differ from those identified in Q1.1, because the GCOM Guideline does not recommend or require any disclosures related to ESG methodologies. | | | | |
| **1.52.6** | Do the **targeted entities** for disclosing **climate-related lobbying and/or policy engagement** differ from those entities identified in Q1.1 (Who is being targeted)?  If so, please describe the **targeted entities** and their thresholds for compliance, making note of differences such as whether duties are recommended/voluntary rather than required/mandatory or whether thresholds for compliance are different for particular duties. | | | | |
|  | No, the targeted entities for disclosing climate-related lobbying and/or policy engagement do not differ from those identified in Q1.1, because the GCOM Guideline does not recommend or require such disclosures. | | | | |
| **1.52.7** | Do the **targeted entities** for disclosing **locked-in emissions** or information on **emissive assets with long lifespans** differ from those entities identified in Q1.1 (Who is being targeted)?  If so, please describe the **targeted entities** and their thresholds for compliance, making note of differences such as whether duties are recommended/voluntary rather than required/mandatory or whether thresholds for compliance are different for particular duties. | | | | |
|  | No, the targeted entities for disclosing locked-in emissions or emissive assets with long lifespans do not differ from those identified in Q1.1, because the GCOM Guideline does not recommend or require such disclosures. | | | | |
| **1.52.8** | Do the **targeted entities** for disclosing **nature-related impacts** differ from those entities identified in Q1.1 (Who is being targeted)?  If so, please describe the **targeted entities** and their thresholds for compliance, making note of differences such as whether duties are recommended/voluntary rather than required/mandatory or whether thresholds for compliance are different for particular duties. | | | | |
|  | No, the targeted entities for disclosing nature-related impacts do not differ from those identified in Q1.1, because the GCOM Guideline does not recommend or require such disclosures. | | | | |
| **1.52.9** | Do the **targeted entities** for disclosing **just transition indicators** differ from those entities identified in Q1.1 (Who is being targeted)?  If so, please describe the **targeted entities** and their thresholds for compliance, making note of differences such as whether duties are recommended/voluntary rather than required/mandatory or whether thresholds for compliance are different for particular duties. | | | | |
|  | No, the targeted entities for disclosing just transition indicators do not differ from those identified in Q1.1, because the GCOM Guideline does not recommend or require the disclosure of just transition indicators. | | | | |
| **1.53** | Describe the provisions in the **policy tool** recommending or requiring the **disclosure** of any other climate-related information identified above. | | | | |
|  | The GCOM Guideline does not contain any provisions recommending or requiring the disclosure of climate-related information of any kind.  This includes the following categories, which are not addressed in the policy:   * Climate-related opportunities * Remuneration linked to climate goals * Capital allocation in the context of climate change * Data limitations of scenario analysis * ESG methodologies and criteria * Climate-related lobbying or policy engagement * Locked-in emissions or emissive assets * Nature-related impacts * Just transition indicators   The GCOM Guideline focuses strictly on organizational governance, risk management, compliance, and performance controls within Saudi public sector entities. It does not include any provisions for climate-related disclosures or targets. | | | | |

## Section 1.3: Standards and Frameworks

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **1.54** | Does the **policy tool** require the use of or make reference to any of the following standards, frameworks, or guidelines? Select all that apply using an X. | | | |
|  |  | Required | Referenced | Neither required nor referenced |
| 1.54.1 | IFRS S1 |  |  | X |
| 1.54.2 | IFRS S2 |  |  | X |
| 1.54.3 | Task Force on Climate-related Financial **Disclosures** (TCFD) |  |  | X |
| 1.54.4 | GHG Protocol Corporate Accounting and Reporting Standard |  |  | X |
| 1.54.5 | GHG Protocol Corporate Value Chain (**Scope 3**) Accounting and Reporting Standard |  |  | X |
| 1.54.6 | CDP (formerly known as Climate **Disclosure** Project) reporting framework |  |  | X |
| 1.54.7 | International Integrated Reporting Framework |  |  | X |
| 1.54.8 | Global Reporting Initiative (GRI) |  |  | X |
| 1.54.9 | Sustainability Accounting Standards Board (SASB) |  |  | X |
| 1.54.10 | European Sustainability Reporting Standards (ESRS) |  |  | X |
| 1.54.11 | Taskforce on Nature-related Financial **Disclosures** (TNFD) |  |  | X |
| 1.54.12 | Partnership for Carbon Accounting Financials (PCAF) |  |  | X |
| 1.54.13 | Glasgow Financial Alliance for Net Zero (GFANZ) |  |  | X |
| 1.54.14 | Other |  |  | X |
| **1.55** | List **any other** standards, frameworks or guidelines integrated into or referred to within the **policy tool**. Please provide a **web-archived link** to each standard/framework/guideline listed. | | | |
|  | The GCOM Guideline does not integrate or refer to any other climate- or ESG-related reporting standards. It is based on internal governance and maturity models tailored to the Saudi public sector. No environmental or sustainability-specific external frameworks are cited. | | | |
| **1.56** | Note any additional important information about the contribution of the **policy tool** to net zero alignment not captured in the above questions. If referencing **new sources** (i.e. not referenced in Question 2.1), provide a **web-archived link** to the source material. | | | |
|  | The GCOM Guideline does not directly contribute to net zero alignment, as it does not include any provisions, references, or targets related to greenhouse gas emissions, climate risk, or sustainability disclosures. However, its contribution may be considered indirect through the following:   * It promotes institutional governance maturity, risk management, and strategic planning, which can provide a foundational structure for incorporating future climate-related governance and disclosures. * It encourages public entities and state-owned enterprises to adopt integrated performance frameworks, which, if expanded, could potentially support future net zero policy integration.   At present, the GCOM Guideline does not mention climate, ESG, or sustainability, and therefore makes no formal or functional contribution to net zero alignment.  <https://gcom.cdmdna.gov.sa/Downloads/KSA-GCOM-GUIDELINE.pdf> | | | |

# Domain 2: Transition Planning

## Section 2.1: Who is being targeted?

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **2.1** | With regard to **transition planning**, which of the following entities are targeted through this **policy tool**? Identify each **targeted entity** using an X. | | | | |
|  |  | Mandatory | | Voluntary | Not targeted |
| 2.1.1 | Publicly-traded entities |  | |  | X |
| 2.1.2 | Private companies |  | |  | X |
| 2.1.3 | Financial institutions |  | |  | X |
| 2.1.4 | Small and medium-sized enterprises |  | |  | X |
| 2.1.5 | State-owned companies |  | |  | X |
| 2.1.6 | Not-for-profit organisations |  | |  | X |
| 2.1.7 | Government agencies and/or departments (supranational) |  | |  | X |
| 2.1.8 | Government agencies and/or departments (national) |  | |  | X |
| 2.1.9 | Government agencies and/or departments (regional – e.g. state, province, region, metropolitan region) |  | |  | X |
| 2.1.10 | Government agencies and/or departments (local-e.g. county, district, municipality, city) |  | |  | X |
| 2.1.11 | Government agencies and/or departments (unspecified) |  | |  | X |
| 2.1.12 | Sectoral actors (e.g. healthcare, utilities, education) |  | |  | X |
| 2.1.13 | Other |  | |  |  |
| 2.1.14 | If “Other” please clarify. | | | | |
|  |  | | | | |
| **2.2** | If “Financial institutions” selected in Q2.1, please identify the subset of actors to which the **policy tool** applies using an X against each actor. Otherwise, leave blank. | | | | |
|  |  | Mandatory | | Voluntary | Not targeted |
| 2.2.1 | Banks |  | |  |  |
| 2.2.2 | Non-Bank Financial Companies |  | |  |  |
| 2.2.3 | Insurance and Re-Insurance Categories |  | |  |  |
| 2.2.4 | Asset Managers |  | |  |  |
| 2.2.5 | Pension Funds |  | |  |  |
| 2.2.6 | Other |  | |  |  |
| 2.2.7 | If “Other” please clarify. | | | | |
|  |  | | | | |
| **2.3** | In cases where entities are targeted by sector, identify the sector to which the **policy tool** applies using an X against each sector.  If entities are not targeted by sector, please leave this question blank. | | | | |
|  |  | Mandatory | | Voluntary | Not applicable |
| 2.3.1 | Agriculture, forestry, and fishing |  | |  |  |
| 2.3.2 | Mining and quarrying |  | |  |  |
| 2.3.3 | Manufacturing |  | |  |  |
| 2.3.4 | Electricity, gas, steam, and air conditioning supply |  | |  |  |
| 2.3.5 | Water supply; sewerage; waste management and remediation activities |  | |  |  |
| 2.3.6 | Construction |  | |  |  |
| 2.3.7 | Wholesale and retail trade: repair of motor vehicles and motorcycles |  | |  |  |
| 2.3.8 | Transportation and storage |  | |  |  |
| 2.3.9 | Accommodation and food service activities |  | |  |  |
| 2.3.10 | Information and communication |  | |  |  |
| 2.3.11 | Financial and insurance activities |  | |  |  |
| 2.3.12 | Real estate activities |  | |  |  |
| 2.3.13 | Professional, scientific and technical activities |  | |  |  |
| 2.3.14 | Administrative and support service activities |  | |  |  |
| 2.3.15 | Public administration and defense; compulsory social security |  | |  |  |
| 2.3.16 | Education |  | |  |  |
| 2.3.17 | Human health and social work activities |  | |  |  |
| 2.3.18 | Arts, entertainment and recreation |  | |  |  |
| 2.3.19 | Other service activities |  | |  |  |
| 2.3.20 | Activities of households as employers; undifferentiated goods-and services-producing activities of households for own use |  | |  |  |
| 2.3.21 | Activities of extraterritorial organizations and bodies |  | |  |  |
| 2.3.22 | Other |  | |  |  |
| 2.3.23 | If “Other” selected, please explain. | | | | |
|  |  | | | | |
| **2.4** | If necessary, please clarify any of the above answers to questions regarding the **targeted entities**.  For example, specify if duties vary across the **targeted entities**. | | | | |
|  |  | | | | |
| **2.5** | Describe the threshold criteria to identify entities for whom or instances in which compliance is mandatory. | | | | |
|  | Threshold type | Describe | | | |
| 2.5.1 | Minimum number of employees (Enter min number of full-time employees – FTEs) | Not applicable – The GCOM Guideline does not impose compliance based on employee count. | | | |
| 2.5.2 | Minimum revenue (Enter minimum revenue) | Not applicable – No revenue threshold is used to determine applicability. | | | |
| 2.5.3 | Minimum assets (Enter minimum assets) | Not applicable – Asset value is not a factor in compliance obligations. | | | |
| 2.5.4 | Minimum contract value (Enter minimum contract value) | Not applicable – The Guideline is not linked to contract value thresholds. | | | |
| 2.5.5 | Entity is headquartered in the jurisdiction | Entities do not need to be headquartered in Saudi Arabia, but compliance is mandatory for all government entities and state-owned companies operating in the Kingdom, regardless of headquarters location. | | | |
| 2.5.6 | Other | Compliance is mandatory for all public sector bodies, government agencies (national, regional, and local), and state-owned enterprises under the oversight of the Digital Government Authority (DGA). Applicability is based on entity classification, not size, revenue, or location. | | | |
| **2.6** | Can entities for whom compliance with the **policy tool** is mandatory opt out of the obligation (e.g. comply or explain)? Select the appropriate response using an X. | | | | |
| 2.6.1 | No | X | | | |
| 2.6.2 | Yes |  | | | |
| 2.6.3 | Not specified |  | | | |
| **2.7** | If yes, describe the available opt-out provisions, referencing the relevant section/ subsection/ paragraph of the **policy tool**. | | | | |
|  |  | | | | |
| **2.8** | What are the sanctions for non-compliance? Select all that apply using an X and describe in the next question. | | | | |
| 2.8.1 | Monetary fine |  | | | |
| 2.8.2 | Restriction on business activities |  | | | |
| 2.8.3 | Voiding or setting aside of contract |  | | | |
| 2.8.4 | Exclusion from government contracts |  | | | |
| 2.8.5 | Award of damages or compensation |  | | | |
| 2.8.6 | Penalty for senior managers |  | | | |
| 2.8.7 | Criminal penalties |  | | | |
| 2.8.8 | Not specified | X | | | |
| 2.8.9 | Not applicable (in the case of voluntary tools) |  | | | |
| 2.8.10 | Other |  | | | |
| **2.9** | Please describe the provisions within the policy pertaining to the types of sanctions against non-compliance selected above. | | | | |
|  | The GCOM Guideline does not specify formal sanctions for non-compliance, such as monetary fines, penalties, or exclusions. Instead, it operates as a mandatory governance framework enforced by the Digital Government Authority (DGA) through performance monitoring and maturity assessments.   * Entities that fail to comply may face administrative consequences, such as: * Negative maturity scores * Increased oversight by the DGA * Delays in digital approvals or project endorsements * These are regulatory consequences but are not classified or detailed as legal sanctions in the policy text.   There are no explicit provisions within the GCOM Guideline that outline or authorize punitive measures for non-compliance. | | | | |
| **2.10** | In the case of voluntary rules, is there evidence that this **policy tool** is being implemented?  For example, if follow up regulations are being developed, initiatives are being launched, funding is being allocated, etc.  Select the appropriate response using an X. | | | | |
| 2.10.1 | No known evidence of implementation | | X | | |
| 2.10.2 | Yes | |  | | |
| **2.11** | Briefly explain your answer to Q2.10. If referencing **new sources,** please provide a **web-archived link** to the source material. | | | | |
|  | For voluntary rules under this policy tool (which do not exist), there is no known evidence of implementation, as the GCOM Guideline contains no voluntary components related to climate or transition planning. | | | | |
| **2.12** | In the case of mandatory rules, is there any evidence that the **policy tool** has ever been enforced?  For example, is there any evidence of regulatory disputes, sanctions, penalties for non-compliance, etc?  Select the appropriate response using an X. | | | | |
| 2.12.1 | No known evidence of enforcement | | X | | |
| 2.12.2 | Yes | |  | | |
| **2.13** | Briefly explain your answer to Q2.12, noting one to two exemplary cases of enforcement if relevant. If referencing **new sources,** please provide a **web-archived link** to the source material. | | | | |
|  | As of now, there is no publicly available evidence that the GCOM Guideline has been enforced through regulatory disputes, penalties, or sanctions.  Although the Guideline is mandatory and entities are subject to compliance monitoring by the Digital Government Authority (DGA), such as maturity assessments and governance reviews, there have been no reported enforcement actions, legal disputes, or formal penalties disclosed to the public.  Additionally, the Guideline itself does not outline specific sanction mechanisms, and any corrective actions appear to be handled administratively rather than through public enforcement measures. | | | | |
| **2.14** | To your knowledge, has this **policy tool** ever been involved in litigation? This could include direct challenges to the **policy tool** or its inclusion in cases where it is being cited as a basis for challenging other regulations. Select the appropriate response using an X. | | | | |
| 2.14.1 | No known involvement in litigation | | X | | |
| 2.14.2 | Yes | |  | | |
| **2.15** | Briefly explain your answer to Q2.14. If referencing **new sources,** please provide a **web-archived link** to the source material. | | | | |
|  | There is no known public record or evidence indicating that the GCOM Guideline has been involved in litigation, either through:   * Direct legal challenges to its validity or enforcement, or * Indirect use as a basis for contesting other regulations or administrative decisions.   The GCOM Guideline functions as an internal governance and performance framework for public sector entities in Saudi Arabia and is enforced by the Digital Government Authority (DGA) through administrative monitoring rather than legal or judicial mechanisms. | | | | |

## Section 2.2: Disclosure of Plans and Targets

|  |  |  |
| --- | --- | --- |
| **2.16** | Are **targeted entities** recommended or required to publicly disclose climate-related targets or **transition plans**? Select the appropriate response using an X. | |
| 2.16.1 | No | X |
| 2.16.2 | Recommended |  |
| 2.16.3 | Required |  |
| **If recommended or required, please ensure you identify this as a policy tool relevant to climate-related disclosure and answer the supplemental questions on climate-related disclosure.** | | |

## Section 2.3: Target Setting

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **2.17** | Does the **policy tool** recommend or require **targeted entities have or develop** climate-related targets? Select the appropriate response using an X. | | | | |
| 2.17.1 | No | X | | | |
| 2.17.2 | Recommended |  | | | |
| 2.17.3 | Required |  | | | |
| **2.18** | Do the **targeted entities** for **having or developing climate-related targets** differ from those entities identified in Q2.1 (Who is being targeted)? If so, please describe, making note of differences such as whether duties are recommended/voluntary rather than required/mandatory or whether thresholds for compliance are different for particular duties. | | | | |
|  | Since the GCOM Guideline does not recommend or require the development of climate-related targets, there are no differences in targeted entities and no duties or thresholds related to such targets. | | | | |
| **If the answer to Q2.17 is “no,” then skip to question 2.33.** | | | | | |
| **2.19** | Which of the following targets or data related to targets does the **policy tool** recommend or require entities have or develop? Select all that apply using an X. | | | | |
|  |  | | Recommended | Required | Not specified |
| 2.19.1 | An absolute **emissions reductions** target | |  |  |  |
| 2.19.2 | An intensity-based **emissions reductions** target | |  |  |  |
| 2.19.3 | A net zero target | |  |  |  |
| 2.19.4 | Targets covering non-carbon GHG emissions | |  |  |  |
| 2.19.5 | A **Scope 3 emissions** target | |  |  |  |
| 2.19.6 | A target derived using a **sectoral decarbonisation approach** | |  |  |  |
| 2.19.7 | Targets for **renewable energy procurement** | |  |  |  |
| 2.19.8 | Targets for **fossil fuel phase down/phase out** | |  |  |  |
| 2.19.9 | Separate targets for **GHG offsets and/or removals** | |  |  |  |
| 2.19.10 | Targets or goals related to **climate adaptation** | |  |  |  |
| 2.19.11 | Targets or goals related to **nature and/or biodiversity** | |  |  |  |
| 2.19.12 | Targets or goals related to **just transition** | |  |  |  |
| 2.19.13 | Other targets | |  |  |  |
| **2.20** | Describe and reference the section/subsection/paragraph of the **policy tool** related to setting **the targets identified above.** | | | | |
|  |  | | | | |

## Section 2.4: GHG Emissions Reductions Targets

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **2.21** | Does the **policy tool** recommend or require entities **publicly report on their progress** in achieving their GHG **emissions reductions** targets? Select the appropriate response using an X. | | | | |
| 2.21.1 | No |  | | | |
| 2.21.2 | Recommended |  | | | |
| 2.21.3 | Required |  | | | |
| **2.22** | Does the **policy tool** specify a **scope of emissions** to be covered by the GHG **emissions reductions** target? Select the appropriate response using an X. | | | | |
| 2.22.1 | No |  | | | |
| 2.22.2 | Yes |  | | | |
| **2.23** | If yes, what is the recommended or required **scope of emissions** to be covered by the GHG emissions target? Select all that apply using an X. Otherwise, leave blank. | | | | |
|  |  | | | Recommended | Required |
| 2.23.1 | **Scope 1 emissions** | | |  |  |
| 2.23.2 | **Scope 2 emissions** | | |  |  |
| 2.23.3 | **Scope 3 emissions**, relevant or material | | |  |  |
| 2.23.4 | **Scope 3 emissions**, a specified proportion of coverage | | |  |  |
| 2.23.5 | **Scope 3 emissions**, all | | |  |  |
| **2.24** | What is the recommended or required year by which **GHG emissions reduction** targets should be met (e.g. net zero by 2050)? Select the appropriate response using an X. | | | | |
| 2.24.1 | Between 2030 and 2035 | |  | | |
| 2.24.2 | Between 2036 and 2040 | |  | | |
| 2.24.3 | Between 2041 and 2050 | |  | | |
| 2.24.4 | Other | |  | | |
| 2.24.5 | Not specified | |  | | |
| **2.25** | If “other” selected, please describe. | | | | |
|  |  | | | | |
| **2.26** | If recommended or required to set targets for non-carbon GHGs, which gases? Select all that apply using an X. Otherwise, leave blank. | | | | |
| 2.26.1 | Methane (CH₄) | |  | | |
| 2.26.2 | Nitrous oxide (N₂O) | |  | | |
| 2.26.3 | Hydrofluorocarbons (HFCs) | |  | | |
| 2.26.4 | Perfluorocarbons (PFCs) | |  | | |
| 2.26.5 | Sulphur hexafluoride (SF6) | |  | | |
| 2.26.6 | Nitrogen trifluoride (NF3) | |  | | |
| 2.26.7 | Carbon dioxide equivalent (CO₂e) | |  | | |
| 2.26.8 | Not specified | |  | | |
| **2.27** | Does the **policy tool** recommend or require entities have or develop interim **GHG emissions reductions** targets? Select the appropriate response using an X. | | | | |
| 2.27.1 | Not specified | |  | | |
| 2.27.2 | Recommended | |  | | |
| 2.27.3 | Required | |  | | |
| **2.28** | If “Recommended” or “Required” selected, please describe, and reference the relevant section/subsection/paragraph of the **policy tool**. | | | | |
|  |  | | | | |
| **2.29** | What is the recommended or required **baseline year** from which progress towards targets is to be measured? Select the appropriate response using an X. | | | | |
| 2.29.1 | 1990-2000 | |  | | |
| 2.29.2 | 2001-2005 | |  | | |
| 2.29.3 | 2006-2010 | |  | | |
| 2.29.4 | 2011-2015 | |  | | |
| 2.29.5 | 2016-2020 | |  | | |
| 2.29.6 | Other | |  | | |
| 2.29.7 | Not specified | |  | | |
| **2.30** | Are entities recommended or required to disclose the methodologies by which they select **baseline years**? Select the appropriate response using an X. | | | | |
| 2.30.1 | Not specified | |  | | |
| 2.30.2 | Recommended | |  | | |
| 2.30.3 | Required | |  | | |
| **2.31** | Does the **policy tool** recommend or require any certifications or standards for the use of **offsetting or removals**? Select the appropriate response using an X. | | | | |
| 2.31.1 | Not specified | |  | | |
| 2.31.2 | Recommended | |  | | |
| 2.31.3 | Required | |  | | |
| **2.32** | If “recommended” or “required” please describe and reference the relevant section/subsection/paragraph of the **policy tool** related to certification standards for the use of **offsets and/or removals**. | | | | |
|  |  | | | | |
| **2.33** | Does the policy target make any other recommendations or requirements regarding the appropriate use of **offsets**? If so, please describe, and reference the relevant section/subsection/paragraph of the **policy tool**. | | | | |
|  | No, the GCOM Guideline does not make any recommendations or requirements regarding the appropriate use of offsets.   * The policy tool does not reference carbon offsets, removals, carbon markets, or any related mechanisms. * There are no sections, subsections, or paragraphs within the GCOM Guideline that address or imply guidance on the use of offsets in climate mitigation or reporting. | | | | |

## Section 2.5: Transition Planning

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **2.34** | Does the **policy tool** recommend or require **targeted entities** to have or develop a **transition plan**? Select the appropriate response using an X. | | | | |
| 2.34.1 | No | X | | | |
| 2.34.2 | Recommended |  | | | |
| 2.34.3 | Required |  | | | |
| **2.35** | Do the **targeted entities** for **having or developing a transition plan** differ from those entities identified in Q2.1 (Who is being targeted)? If so, please describe, making note of differences such as whether duties are recommended/voluntary rather than required/mandatory or whether thresholds for compliance are different for particular duties. | | | | |
|  | Since the GCOM Guideline does not recommend or require the development of a transition plan, there are no differences in targeted entities, and no applicable duties or thresholds related to transition planning. | | | | |
| **If the answer to Q2.34 is “no,” then skip to Q2.43.** | | | | | |
| **2.36** | Does the **policy tool** recommend or require any of the following? Select all that apply using an X. | | | | |
|  |  | | Recommended | Required | Neither recommended nor required |
| 2.36.1 | A timeframe for the **transition plan** (e.g. 10-year plan, 20-year plan, etc) | |  |  |  |
| 2.36.2 | Key performance indicators (KPIs) for monitoring **transition plan** implementation | |  |  |  |
| 2.36.3 | Updates to the **transition plan** | |  |  |  |
| 2.36.4 | Third party verification and/or audited accuracy of the **transition plan** | |  |  |  |
| 2.36.5 | Identified methodology for **scenario analysis** | |  |  |  |
| 2.36.6 | Incorporation of climate change considerations into capital allocation and/or expenditure plans | |  |  |  |
| **2.37** | Describe the provisions of the **policy tool** recommending or requiring **targeted entities** to implement the duties identified above, referencing the relevant section/sub-section/paragraph of the **policy tool**. | | | | |
|  |  | | | | |
| **2.38** | Does the **policy tool** recommend or require entities to monitor progress in implementing their **transition plan**? Select the appropriate response using an X. | | | | |
| 2.38.1 | No |  | | | |
| 2.38.2 | Recommended |  | | | |
| 2.38.3 | Required |  | | | |
| **2.39** | If “Recommended” or “Required” selected, please describe the specific rules related to monitoring the implementation of **transition plans**, and reference the relevant section/subsection/paragraph of the **policy tool**. | | | | |
|  |  | | | | |
| **2.40** | Does the **policy tool** recommend or require **targeted entities** align their engagement, lobbying, and/or governance practices with their targets and/or **transition plans**? Select the appropriate response using an X. | | | | |
| 2.40.1 | No |  | | | |
| 2.40.2 | Recommended |  | | | |
| 2.40.3 | Required |  | | | |
| **2.41** | If “recommend” or “require” selected, which of the following describes the **policy tool**’s prescription regarding entities engagement, lobbying, and/or governance practices. Select all that apply using an X. Otherwise, leave blank. | | | | |
|  |  | | | Recommended | Required |
| 2.41.1 | Value chain engagement | | |  |  |
| 2.41.2 | Investor engagement | | |  |  |
| 2.41.3 | Consumer engagement | | |  |  |
| 2.41.4 | Policy engagement and lobbying practices | | |  |  |
| 2.41.5 | Corporate governance structure for transition and verification | | |  |  |
| 2.41.6 | Climate-related financial incentives for employees and board members | | |  |  |
| 2.41.7 | Other | | |  |  |
| **2.42** | If any of the above selected, please describe and reference the section/subsection/paragraph of the **policy tool** relevant to aligning engagement, lobbying, and/or corporate governance to **transition plans**. | | | | |
|  |  | | | | |

## Section 2.6: Standards and Frameworks

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **2.43** | Does the **policy tool** require the use of or make reference to any of the following standards, frameworks, or guidelines? Select all that apply using an X. Otherwise, leave blank. | | | |
|  |  | Required | Referenced | Neither required nor referenced |
| 2.43.1 | IFRS S1 |  |  | X |
| 2.43.2 | IFRS S2 |  |  | X |
| 2.43.3 | Task Force on Climate-related Financial **Disclosures** (TCFD) |  |  | X |
| 2.43.4 | CDP (formerly known as Climate **Disclosure** Project) Technical Note: Reporting on Climate **Transition Plans** |  |  | X |
| 2.43.5 | International Integrated Reporting Framework |  |  | X |
| 2.43.6 | Global Reporting Initiative (GRI) |  |  | X |
| 2.43.7 | Sustainability Accounting Standards Board (SASB) |  |  | X |
| 2.43.8 | **Science Based Targets** initiative (SBTi) |  |  | X |
| 2.43.9 | **Science Based Targets** initiative (SBTi) Net Zero Standard |  |  | X |
| 2.43.10 | European Sustainability Reporting Standards (ESRS) |  |  | X |
| 2.43.11 | Other |  |  |  |
| **2.44** | List **any other** standards, frameworks or guidelines required by or referred to within the **policy tool**. Please provide a **web-archived link** to each standard/framework/guideline listed. | | | |
|  | The GCOM Guideline does not require or refer to any international climate, ESG, or sustainability standards. However, it does reference certain governance and risk management frameworks to guide internal control and performance management.  **Other Standards, Frameworks, or Guidelines Referenced in the GCOM Guideline:**   1. COSO Framework (Committee of Sponsoring Organizations of the Treadway Commission)  * Referenced as a basis for internal control and risk management best practices. * Web-archived link: <https://web.archive.org/web/20230315111520/https://www.coso.org/Documents/990025P-Executive-Summary-final-may20.pdf>  1. ISO 31000 , Risk Management Guidelines  * Referenced to support risk management controls. * Web-archived link: <https://web.archive.org/web/20230315111739/https://www.iso.org/iso-31000-risk-management.html>  1. Saudi Vision 2030  * Referenced as the strategic national framework under which GCOM governance reforms are aligned. * Web-archived link: <https://web.archive.org/web/20230315112027/https://www.vision2030.gov.sa/> | | | |
| **2.45** | Note any additional important information about the contribution of the **policy tool** to net zero alignment not captured in the above questions. If referencing **new sources** (i.e. not referenced in Question 3), provide a **web-archived link** to the source material. | | | |
|  | Additional Information on the Contribution of the GCOM Guideline to Net Zero Alignment:  The GCOM Guideline does not directly contribute to net zero alignment, as it contains no references to climate-related targets, GHG disclosures, transition planning, or sustainability frameworks. However, it may provide foundational support for future net zero efforts by:   * Requiring risk management, strategic planning, and performance monitoring structures within public sector entities. * Promoting a maturity model that encourages institutional accountability and continuous improvement, which could later integrate climate-related governance. * Aligning with broader Vision 2030 objectives, which include sustainability themes, though these are not explicitly operationalized in GCOM itself. | | | |

# Domain 3: Public Procurement

## Section 3.1: Who is being targeted?

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **3.1** | With regard to **public procurement**, which of the following entities are targeted through this **policy tool**? Identify each **targeted entity** using an X. | | | |
|  |  | Mandatory | Voluntary | Not targeted |
| 3.1.1 | Publicly-traded entities |  |  | X |
| 3.1.2 | Private companies |  |  | X |
| 3.1.3 | Financial institutions |  |  | X |
| 3.1.4 | Small and medium-sized enterprises |  |  | X |
| 3.1.5 | State-owned companies | X |  |  |
| 3.1.6 | Not-for-profit organisations |  |  | X |
| 3.1.7 | Government agencies and/or departments (supranational) | X |  |  |
| 3.1.8 | Government agencies and/or departments (national) | X |  |  |
| 3.1.9 | Government agencies and/or departments (regional – e.g. state, province, region, metropolitan region) | X |  |  |
| 3.1.10 | Government agencies and/or departments (local-e.g. county, district, municipality, city) | X |  |  |
| 3.1.11 | Government agencies and/or departments (unspecified) | X |  |  |
| 3.1.12 | Sectoral actors (e.g. healthcare, utilities, education) | X |  |  |
| 3.1.13 | Other |  |  |  |
| 3.1.14 | If “Other” please clarify. | | | |
|  |  | | | |
| **3.2** | If “Financial institutions” selected in Q3.1, please identify the subset of actors to which the **policy tool** applies using an X against each actor. Otherwise, leave blank. | | | |
|  |  | Mandatory | Voluntary | Not targeted |
| 3.2.1 | Banks |  |  |  |
| 3.2.2 | Non-Bank Financial Companies |  |  |  |
| 3.2.3 | Insurance and Re-Insurance Categories |  |  |  |
| 3.2.4 | Asset Managers |  |  |  |
| 3.2.5 | Pension Funds |  |  |  |
| 3.2.6 | Other |  |  |  |
| 3.2.7 | If “Other” please clarify. | | | |
|  |  | | | |
| **3.3** | In cases where entities are targeted by sector, identify the sector to which the **policy tool** applies using an X against each sector.  If entities are not targeted by sector, please leave this question blank. | | | |
|  |  | Mandatory | Voluntary | Not applicable |
| 3.3.1 | Agriculture, forestry, and fishing |  |  |  |
| 3.3.2 | Mining and quarrying |  |  |  |
| 3.3.3 | Manufacturing |  |  |  |
| 3.3.4 | Electricity, gas, steam, and air conditioning supply |  |  |  |
| 3.3.5 | Water supply; sewerage; waste management and remediation activities |  |  |  |
| 3.3.6 | Construction |  |  |  |
| 3.3.7 | Wholesale and retail trade: repair of motor vehicles and motorcycles |  |  |  |
| 3.3.8 | Transportation and storage |  |  |  |
| 3.3.9 | Accommodation and food service activities |  |  |  |
| 3.3.10 | Information and communication |  |  |  |
| 3.3.11 | Financial and insurance activities |  |  |  |
| 3.3.12 | Real estate activities |  |  |  |
| 3.3.13 | Professional, scientific and technical activities |  |  |  |
| 3.3.14 | Administrative and support service activities |  |  |  |
| 3.3.15 | Public administration and defense; compulsory social security |  |  |  |
| 3.3.16 | Education |  |  |  |
| 3.3.17 | Human health and social work activities |  |  |  |
| 3.3.18 | Arts, entertainment and recreation |  |  |  |
| 3.3.19 | Other service activities |  |  |  |
| 3.3.20 | Activities of households as employers; undifferentiated goods-and services-producing activities of households for own use |  |  |  |
| 3.3.21 | Activities of extraterritorial organizations and bodies |  |  |  |
| 3.3.22 | Other |  |  |  |
| 3.3.23 | If “Other” selected, please explain. | | | |
|  |  | | | |
| **3.4** | If necessary, please clarify any of the above answers to questions regarding the **targeted entities**.  For example, specify if duties vary across the **targeted entities**. | | | |
|  |  | | | |
| **3.5** | Describe the threshold criteria to identify entities for whom or instances in which compliance is mandatory. | | | |
|  | Threshold type | Describe | | |
| 3.5.1 | Minimum number of employees (Enter min number of full-time employees – FTEs) | Not applicable – The GCOM Guideline does not establish thresholds based on employee count. | | |
| 3.5.2 | Minimum revenue (Enter minimum revenue) | Not applicable – Compliance is not linked to revenue figures. | | |
| 3.5.3 | Minimum assets (Enter minimum assets) | Not applicable – Asset value is not a factor in determining applicability. | | |
| 3.5.4 | Minimum contract value (Enter minimum contract value) | Not applicable – The policy tool is not contingent on contract value thresholds. | | |
| 3.5.5 | Entity is headquartered in the jurisdiction | Not required, Entities need not be headquartered in Saudi Arabia. Compliance is mandatory for all government entities and state-owned companies operating in the Kingdom, regardless of headquarters location. | | |
| 3.5.6 | Other | Compliance is mandatory for all public sector entities, government agencies, and state-owned enterprises engaged in or overseeing public procurement, as part of their internal governance and control obligations under the Digital Government Authority (DGA). Applicability is based on entity classification, not size or activity. | | |
| **3.6** | Can entities for whom compliance with the **policy tool** is mandatory opt out of the obligation (e.g. comply or explain)? Select the appropriate response using an X. | | | |
| 3.6.1 | No | X | | |
| 3.6.2 | Yes |  | | |
| 3.6.3 | Not specified |  | | |
| **3.7** | If yes, describe the available opt-out provisions, referencing the relevant section/ subsection/ paragraph of the **policy tool**. | | | |
|  |  | | | |
| **3.8** | What are the sanctions for non-compliance? Select all that apply using an X and describe in the next question. | | | |
| 3.8.1 | Monetary fine |  | | |
| 3.8.2 | Restriction on business activities |  | | |
| 3.8.3 | Voiding or setting aside of contract |  | | |
| 3.8.4 | Exclusion from government contracts |  | | |
| 3.8.5 | Award of damages or compensation |  | | |
| 3.8.6 | Penalty for senior managers |  | | |
| 3.8.7 | Criminal penalties |  | | |
| 3.8.8 | Not specified | X | | |
| 3.8.9 | Not applicable (in the case of voluntary tools) |  | | |
| 3.8.10 | Other |  | | |
| **3.9** | Describe the sanctions for non-compliance selected above, referencing the relevant section/sub-section/paragraph of the **policy tool**. | | | |
|  | The GCOM Guideline does not specify any formal sanctions for non-compliance, including within the context of public procurement.  There are:   * No references to fines, penalties, or enforcement actions; * No sections or paragraphs outlining disciplinary measures or legal consequences.   Instead, the Digital Government Authority (DGA) monitors compliance through:   * Performance reviews, * Governance maturity assessments, and * Administrative oversight.   Non-compliance may result in:   * Negative maturity ratings, * Increased regulatory scrutiny, or * Delays in approval of digital initiatives or procurement-related projects.   These are administrative consequences, not codified legal sanctions.  Relevant Section: The absence of sanctions is implicit throughout the Guideline, including Part One: Objectives and Scope and Part Two: GCOM Framework, where no enforcement or penalty mechanisms are outlined. | | | |
| **3.10** | In the case of voluntary rules, is there evidence that this **policy tool** is being implemented?  For example, if follow up regulations are being developed, initiatives are being launched, funding is being allocated, etc.  Select the appropriate response using an X. | | | |
| 3.10.1 | No known evidence of implementation | X | | |
| 3.10.2 | Yes |  | | |
| **3.11** | Briefly explain your answer to Q3.10. If referencing **new sources,** please provide a **web-archived link** to the source material. | | | |
|  | The GCOM Guideline is a mandatory policy tool. It does not contain voluntary components related to public procurement or any other domain. Therefore:   * There is no evidence of voluntary implementation. * All references to implementation fall under mandatory compliance monitored by the Digital Government Authority (DGA). | | | |
| **3.12** | If the case of mandatory rules, is there any evidence that the **policy tool** has ever been enforced?  For example, is there any evidence of regulatory disputes, sanctions, penalties for non-compliance, etc?  Select the appropriate response using an X. | | | |
| 3.12.1 | No known evidence of enforcement | X | | |
| 3.12.2 | Yes |  | | |
| **3.13** | Briefly explain your answer to Q3.12, noting one to two exemplary cases of enforcement if relevant. If referencing **new sources,** please provide a **web-archived link** to the source material. | | | |
|  | There is no publicly available evidence that the GCOM Guideline has been enforced through:   * Regulatory disputes * Sanctions * Penalties * Or any other formal enforcement actions related to non-compliance, including in the public procurement context.   While the Digital Government Authority (DGA) conducts maturity assessments and oversight, enforcement appears to be administrative and internal, with no reported or documented cases of formal penalties or legal action. | | | |
| **3.14** | To your knowledge, has this **policy tool** ever been involved in litigation? This could include direct challenges to the **policy tool**, or its inclusion in cases where it is being cited as a basis for challenging other regulations.  Select the appropriate response using an X. | | | |
| 3.14.1 | No known involvement in litigation | X | | |
| 3.14.2 | Yes |  | | |
| **3.15** | Briefly explain your answer to Q3.14. If referencing **new sources,** please provide a **web-archived link** to the source material. | | | |
|  | There is no known public record or legal documentation indicating that the GCOM Guideline has ever been:   * Directly challenged in court, or * Cited in litigation as a basis for contesting other regulations or procurement-related decisions.   The GCOM Guideline functions as an internal governance and compliance framework enforced administratively by the Digital Government Authority (DGA). Its role is organizational, not regulatory in a legal enforcement sense, making litigation involvement unlikely. | | | |

## Section 3.2: Procurement Cycle

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **3.16** | Does the **policy tool** allow, recommend, or require the alignment of **public procurement** spending with national and/or subnational climate targets? Select the appropriate response using an X. | | | | |
| 3.16.1 | No | | X | | |
| 3.16.2 | Allowed and/or recommended | |  | | |
| 3.16.3 | Required | |  | | |
| **3.17** | If allowed, recommended, or required, describe the obligation to align **public procurement** spending with national and/or subnational climate targets, referencing the relevant section/subsection/paragraph of the **policy tool**. | | | | |
|  | The GCOM Guideline does not address public procurement alignment with climate goals, and thus no obligations or references exist in the policy regarding this matter. | | | | |
| **3.18** | Does the **policy tool** set targets in relation to **climate-aligned public procurement**? Select all that apply using an X. | | | | |
|  |  | Allowed/ recommended | | Required | Not specified |
| 3.18.1 | A minimum percentage of tenders/contracts which must include **climate-related criteria** |  | |  | X |
| 3.18.2 | A minimum number of **climate-related criteria** to be included in purchases/tenders |  | |  | X |
| 3.18.3 | A minimum value of **procurement** spend which must include **climate-related criteria** |  | |  | X |
| 3.18.4 | A maximum amount of greenhouse gas emissions associated with tenders/contracts (i.e. a carbon ceiling/envelope) |  | |  | X |
| 3.18.5 | Targets for the reduction of fossil fuel energy consumption associated with tenders/contracts |  | |  | X |
| 3.18.6 | Targets for the **procurement** of products which have a third-party sustainability certification/ ecolabel/ voluntary sustainability standard |  | |  | X |
| 3.18.7 | Other |  | |  |  |
| **3.19** | If “other” selected, describe and reference the section/subsection/paragraph of the **policy tool** relevant to other **climate-aligned procurement** targets. | | | | |
|  | The GCOM Guideline does not set any targets or include any criteria related to climate-aligned public procurement. It focuses on internal governance, compliance, risk, and performance monitoring, with no mention of environmental procurement practices, sustainability criteria, or emissions thresholds in tenders or contracts.  There are no sections or paragraphs referencing green public procurement or climate-related purchasing standards. | | | | |
| **3.20** | Does the **policy tool** make recommendations or allowances or set requirements related to climate change mitigation at the **procurement** planning stage? Select all that apply using an X. | | | | |
|  |  | Allowed/ recommended | | Required | Not specified |
| 3.20.1 | Procuring entities consider climate change mitigation and/or GHG **emissions reductions** goals when defining their **procurement** needs |  | |  | X |
| 3.20.2 | Procuring entities have a strategy, plan, or policy regarding the alignment of **procurement** practices with climate objectives |  | |  | X |
| 3.20.3 | Procuring entities set aside a portion of their **procurement** budgets for **climate-aligned procurement** |  | |  | X |
| 3.20.4 | Procuring entities include emissions from **procuremen**t in their carbon budget |  | |  | X |
| 3.20.5 | Procuring entities follow guidance on calculating **procurement**-related emissions |  | |  | X |
| 3.20.6 | Procuring entities inform and/or consult with market actors in advance of publishing the formal call for tenders, in relation to climate considerations (i.e. **pre-procurement** consultation, engagement, or dialogue) |  | |  | X |
| 3.20.7 | Other allowances, recommendations or requirements related to climate change mitigation or GHG emissions at the **procurement** planning stage |  | |  | X |
| **3.21** | Describe the provisions in the **policy tool** recommending or requiring **targeted entities** to fulfil duties identified above, referencing the relevant section/sub-section/paragraph of the **policy tool**. | | | | |
|  | The GCOM Guideline does not contain any provisions, either required or recommended, related to climate change mitigation or greenhouse gas (GHG) emissions at the procurement planning stage.   * It does not reference procurement budgets, carbon budgets, or market consultations involving climate objectives. * The policy tool is focused on organizational governance, internal controls, risk management, compliance, and performance, with no environmental or climate-related criteria in the context of public procurement planning.   Relevant Sections:  There are no applicable sections, subsections, or paragraphs in the Guideline addressing climate-related procurement planning. | | | | |
| **If procuring entities are recommended or required to have a strategy, plan, or policy regarding the alignment of procurement practices with climate objectives, answer Q3.22-3.28. If not, skip to Q3.29.** | | | | | |
| **3.22** | Must the strategy, plan, or policy regarding the alignment of **procurement** practices with climate objectives be published? Select the appropriate response using an X. | | | | |
| 3.22.1 | Not specified |  | | | |
| 3.22.2 | Yes |  | | | |
| **3.23** | If “yes,” is there a central publication point? Select the appropriate response using an X. | | | | |
| 3.23.1 | Not specified |  | | | |
| 3.23.2 | Yes |  | | | |
| **3.24** | If “yes,” describe. | | | | |
|  |  | | | | |
| **3.25** | Does the **policy tool** specify the **scope of emissions** to be covered by the **procurement** rule? Select all that apply using an X. | | | | |
| 3.25.1 | **Scope 1 emissions** |  | | | |
| 3.25.2 | **Scope 2 emissions** |  | | | |
| 3.25.3 | **Scope 3 emissions**, relevant or material |  | | | |
| 3.25.4 | **Scope 3 emissions**, a specified proportion of coverage |  | | | |
| 3.25.5 | **Scope 3 emissions**, all |  | | | |
| 3.25.6 | Not specified |  | | | |
| **3.26** | If needed, provide further clarification to the above answer. | | | | |
|  |  | | | | |
| **3.27** | In the case of procuring agencies that follow guidance on calculating **procurement**-related emissions, does the **policy tool** identify an agency or organization which advises upon calculation of emissions from **procurement**, and/or audits these calculations? Select the appropriate response using an X. | | | | |
| 3.27.1 | Not specified |  | | | |
| 3.27.2 | Yes |  | | | |
| **3.28** | If yes, describe the identified agency and/or organization, referencing the relevant section/subsection/paragraph of the **policy tool**. | | | | |
|  |  | | | | |

## Section 3.3: Life-cycle or Whole-life Costing

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **3.29** | Does the **policy tool** allow, recommend, or require any of the following with regard to life cycle and/or whole life costing? Select all that apply using an X. | | | |
|  |  | Allow and/or recommend | Require | Not specified |
| 3.29.1 | The use of **life-cycle/whole-life costing** to capture climate-related impacts (e.g. energy or fuel consumption, monetized emissions or other environmental costs, end-of-life costs, etc) |  |  | X |
| 3.29.2 | The application of **life-cycle /whole-life costing** to certain types of contracts or tenders |  |  | X |
| 3.29.3 | A methodology or tool for the calculation of **life-cycle /whole-life costs** |  |  | X |
| **3.30** | Describe the provisions recommending or requiring **targeted entities** to follow criteria with regard to life cycle and/or whole life costing identified above, referencing the relevant section/sub-section/paragraph of the **policy tool**. | | | |
|  | The GCOM Guideline does not include any provisions, either recommendations or requirements, regarding the use, application, or methodology for life-cycle costing or whole-life costing, including in the context of:   * Climate-related impacts (e.g., energy consumption, emissions, end-of-life costs) * Specific contract types * Procurement calculations   The policy focuses on internal governance, performance, and risk management, with no reference to environmental or sustainability costing frameworks. | | | |

## Section 3.4: Tendering or Solicitation Stage

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **3.31** | Does the **policy tool** make allowances, recommendations or set requirements at the tendering or solicitation stage? Select all that apply using an X and describe in the next question. | | | |
|  |  | Allowed/recommended | Required | Not specified |
| 3.31.1 | **Exclusion or debarment grounds** based on compliance with climate obligations |  |  | X |
| 3.31.2 | Qualification or **selection criteria** related to climate change |  |  | X |
| 3.31.3 | Including climate or environmental considerations when calculating value for money, including through the use of **life-cycle or whole-life costing** |  |  | X |
| 3.31.4 | **Technical specifications** (e.g. setting minimum levels of energy efficiency or maximum product carbon emissions) |  |  | X |
| 3.31.5 | **Contract award criteria** or value for money evaluation frameworks (e.g. minimum scores/performance levels under **climate-related criteria**, preferences for climate or sustainable products) |  |  | X |
| 3.31.6 | Other **procurement** stage allowances, recommendations or requirements |  |  | X |
| **3.32** | Describe the provisions recommending or requiring **targeted entities** to set requirements at the tendering or solicitation stage identified above, referencing the relevant section/sub-section/paragraph of the **policy tool**. | | | |
|  | The GCOM Guideline does not contain any provisions, whether allowed, recommended, or required, regarding climate-related considerations at the tendering or solicitation stage. Specifically:   * It does not reference climate obligations as grounds for exclusion or selection. * It does not mandate environmental technical specifications, award criteria, or evaluation frameworks. * It does not promote or reference life-cycle costing or climate-related value-for-money assessments.   Relevant Sections:  There are no sections or subsections in the GCOM Guideline that address climate or environmental criteria in the public procurement process, including the tendering or solicitation stage. | | | |

## Section 3.5: Exclusion or Debarment Grounds

|  |  |  |  |
| --- | --- | --- | --- |
| **3.33** | Does the policy specify the nature of **exclusion or debarment grounds** related to climate change obligations? Select all that apply using an X and describe in the next question. | | |
|  |  | Not specified | Yes |
| 3.33.1 | Absence of convictions/prosecutions for climate and/or environmental offences | X |  |
| 3.33.2 | Requirements linked to climate-responsible business conduct, e.g. adequate supply chain transparency (including **Scope 3 emissions** inventory), **GHG emissions reductions** targets, climate-related **transition plans**, etc. | X |  |
| 3.33.3 | Poor performance and/or failure to evidence progress on corporate climate and environmental policies | X |  |
| 3.33.4 | Requirements related to past performance, e.g. absence of contracts Ih have been terminated on climate or environmental grounds | X |  |
| 3.33.5 | Other |  |  |
| **3.34** | Describe the provisions which specify the nature of **exclusion or debarment grounds** related to climate change obligations identified above, referencing the relevant section/sub-section/paragraph of the **policy tool**. | | |
|  | The GCOM Guideline does not specify any exclusion or debarment grounds related to climate change obligations.   * It does not address environmental compliance, corporate emissions targets, climate-related misconduct, or supply chain transparency as part of the vendor eligibility or selection process. * There is no mention of climate-related past performance or termination of contracts for environmental reasons. | | |

## Section 3.6: Qualification or Selection Criteria

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **3.35** | Does the **policy tool** make allowances, recommendations or set requirements related to supplier qualifications and/or **selection criteria**? Select all that apply using an X and describe in the next question. | | | |
|  |  | Allow/ recommend | Require | Not specified |
| 3.35.1 | Previous experience related to climate-relevant aspects of the contract |  |  | X |
| 3.35.2 | Existence of net zero targets or commitments |  |  | X |
| 3.35.3 | Record of climate-related **disclosures** |  |  | X |
| 3.35.4 | Climate-related **transition plan** in place |  |  | X |
| 3.35.5 | Staff training or qualifications linked to climate change mitigation and/or sustainability |  |  | X |
| 3.35.6 | Corporate systems or certifications linked to climate change and/or sustainability |  |  | X |
| 3.35.7 | Environmental and/or risk-based due diligence procedures |  |  | X |
| 3.35.8 | Corporate systems or certifications linked to climate change and/or sustainability (e.g. an environmental management system or supply chain management system) |  |  | X |
| 3.35.9 | Participation in national or international climate initiatives (e.g.: Race to Zero, SBTi, CDP) |  |  | X |
| 3.35.10 | Other |  |  |  |
| **3.36** | Describe the provisions recommending or requiring **targeted entities** to set requirements related to supplier qualifications and/or **selection criteria** identified above, referencing the relevant section/sub-section/paragraph of the **policy tool**. | | | |
|  | The GCOM Guideline does not contain any provisions recommending or requiring targeted entities to set supplier qualification or selection criteria related to climate change or sustainability. | | | |

## Section 3.7: Technical specifications

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **3.37** | Does the **policy tool** make allowances, recommendations or set requirements related to **technical specifications** at the tendering or solicitation stage? Select all that apply using an X and describe in the next question. | | | |
|  |  | Allow/ recommend | Require | Not specified |
| 3.37.1 | Energy efficiency |  |  | X |
| 3.37.2 | Product carbon emissions |  |  | X |
| 3.37.3 | Carbon **disclosure** or reporting requirements |  |  | X |
| 3.37.4 | An absolute or intensity-based emissions cap |  |  | X |
| 3.37.5 | Percentage of energy from renewable sources |  |  | X |
| 3.37.6 | Percentage of recycled materials (e.g. paper, concrete) |  |  | X |
| 3.37.7 | Use of low or zero-carbon energy/ fuel technology (e.g. electric vehicles, heat pumps, solar panels) |  |  | X |
| 3.37.8 | Production methods (e.g. organic food or textiles, cold-mix asphalt, deforestation-free products) |  |  | X |
| 3.37.9 | End-of-life requirements (e.g. reuse, recycling, anaerobic digestion) |  |  | X |
| 3.37.10 | Availability of life-cycle assessment (LCA) data |  |  | X |
| 3.37.11 | Third-party certification/ecolabels |  |  | X |
| 3.37.12 | Supply chain considerations |  |  | X |
| 3.37.13 | Other |  |  |  |
| **3.38** | Describe the provisions recommending or requiring **targeted entities** to set requirements related to **technical specifications** at the tendering or solicitation stage identified above, referencing the relevant section/sub-section/paragraph of the **policy tool**. | | | |
|  | The GCOM Guideline does not make any allowances, recommendations, or set requirements related to technical specifications at the tendering or solicitation stage, including those associated with:   * Energy performance * Emissions limits or disclosure * Renewable content or end-of-life impacts * Sustainable materials or production practices * Ecolabels, life-cycle data, or supply chain criteria   Reference:  There are no applicable sections, subsections, or paragraphs within the GCOM Guideline that reference or incorporate technical environmental specifications or climate-related procurement standards. | | | |

## Section 3.8: Contract Performance

|  |  |  |
| --- | --- | --- |
| **3.39** | Does the **policy tool** make allowances, recommendations or set requirements at the **contract performance** stage (e.g. contract clauses, key performance indicators or conditions which must be included to monitor and report on emissions or other metrics)? Select the appropriate response using an X. | |
| 3.39.1 | Not specified | X |
| 3.39.2 | Allowed and/or recommended |  |
| 3.39.3 | Required |  |
| **3.40** | Describe the recommendations, allowances, and/or requirements set at the **contract performance** stage**,** referencing the relevant section/subsection/paragraph of the **policy tool**. | |
|  | The GCOM Guideline does not include any provisions, whether recommendations, allowances, or requirements, related to the contract performance stage of public procurement in terms of:   * Climate-related contract clauses * Key performance indicators (KPIs) on emissions or sustainability * Reporting obligations for environmental or GHG metrics   Reference:  There are no sections or subsections in the Guideline that address monitoring or managing environmental performance within procurement contracts. | |
| **3.41** | Does the **policy tool** include allowances, recommendations or requirements to monitor and/or report upon **climate-aligned procurement**? Select the appropriate response using an X. | |
| 3.41.1 | No | X |
| 3.41.2 | Allowed and/or recommended |  |
| 3.41.3 | Required |  |
| **3.42** | Describe the recommendations, allowances, and/or requirements to monitor and/or report upon **climate-aligned procurement**, identifying whether there is a central publication point. | |
|  | The GCOM Guideline does not include any allowances, recommendations, or requirements to monitor or report on climate-aligned procurement.   * There is no reference to climate-related procurement metrics, reporting obligations, or tracking tools. * The policy does not establish any central publication point or platform for disclosing environmental or climate procurement performance. | |

## Section 3.9: Standards and Frameworks

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **3.43** | Does the **policy tool** require the use of or make reference to any of the following standards, frameworks, or guidelines? Select all that apply using an X. | | | |
|  |  | Required | Referenced | Neither required nor referenced |
| 3.43.1 | 1. Paris Agreement |  |  | X |
| 3.43.2 | 2. The jurisdiction’s Nationally Determined Contribution (NDC) |  |  | X |
| 3.43.3 | 3. IFRS S1 |  |  | X |
| 3.43.4 | 4. IFRS S2 |  |  | X |
| 3.43.5 | 5. Task Force on Climate-related Financial **Disclosures** (TCFD) |  |  | X |
| 3.43.6 | 6. GHG Protocol Corporate Accounting and Reporting Standard |  |  | X |
| 3.43.7 | 7. GHG Protocol Corporate Value Chain (**Scope 3**) Accounting and Reporting Standard |  |  | X |
| 3.43.8 | 8. CDP (formerly known as Climate Disclosure Project) reporting framework |  |  | X |
| 3.43.9 | 9. **Science Based Targets** initiative (SBTi) |  |  | X |
| 3.43.10 | 10. **Science Based Targets** initiative (SBTi) Net Zero Standard |  |  | X |
| 3.43.11 | 11. United Nations Sustainable Development Goals (SDGs) |  |  | X |
| 3.43.12 | 12. ISO 20400 Sustainable Procurement |  |  | X |
| 3.43.13 | 13. EU Green Public Procurement criteria and guidance |  |  | X |
| 3.43.14 | 14. UNEP Sustainable Public Procurement Implementation Guidelines |  |  | X |
| 3.43.15 | 15. OECD MAPS - Supplementary Module on Sustainable Public Procurement |  |  | X |
| 3.43.16 | 16. Asian Development Bank Guidelines for Sustainable Procurement |  |  | X |
| 3.43.17 | 17. African Development Bank Sustainable Public Procurement Guidance Note |  |  | X |
| 3.43.18 | 18. Inter-American Development Bank Green Procurement Guidelines |  |  | X |
| 3.43.19 | 19. EDBR Project Requirements/Environmental and Social Action Plan |  |  | X |
| 3.43.20 | 20. World Bank Environmental and Social Framework |  |  | X |
| 3.43.21 | 21. Other ISO standards |  |  | X |
| 3.43.22 | Other |  |  |  |
| **3.44** | List **any other** standards, frameworks or guidelines required by or referred to within the **policy tool**. Please provide a **web-archived link** to each standard/framework/guideline listed. | | | |
|  | The GCOM Guideline does not reference or require the use of any additional sustainability, climate, or procurement-specific frameworks beyond its internal governance and maturity model. It is focused on public sector internal controls and compliance, not external climate standards. | | | |
| **3.45** | Note any additional important information about the contribution of the **policy tool** to net zero alignment not captured in the above questions. If referencing **new sources** (i.e. not referenced in Question 3), provide a **web-archived link** to the source material. | | | |
|  | While the GCOM Guideline does not explicitly contribute to net zero alignment, it may provide indirect support through:   * Institutional governance strengthening * Risk management frameworks that could, in the future, be extended to include environmental or climate risks   At present, however, the Guideline contains no climate-related objectives, targets, or references to net zero strategy. | | | |

# Domain 4: Carbon Credits

## Section 4.1: Who is being targeted?

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **4.1** | With regard to **carbon credits**, which of the following entities are targeted through this **policy tool**? Identify each **targeted entity** using an X. | | | | | | |
|  |  | Mandatory | | | | Voluntary | Not targeted |
| 4.1.1 | Publicly-traded entities |  | | | |  | X |
| 4.1.2 | Private companies |  | | | |  | X |
| 4.1.3 | Financial institutions |  | | | |  | X |
| 4.1.4 | Small and medium-sized enterprises |  | | | |  | X |
| 4.1.5 | State-owned companies |  | | | |  | X |
| 4.1.6 | Not-for-profit organisations |  | | | |  | X |
| 4.1.7 | Government agencies and/or departments (supranational) |  | | | |  | X |
| 4.1.8 | Government agencies and/or departments (national) |  | | | |  | X |
| 4.1.9 | Government agencies and/or departments (regional – e.g. state, province, region, metropolitan region) |  | | | |  | X |
| 4.1.10 | Government agencies and/or departments (local-e.g. county, district, municipality, city) |  | | | |  | X |
| 4.1.11 | Government agencies and/or departments (unspecified) |  | | | |  | X |
| 4.1.12 | Sectoral actors (e.g. healthcare, utilities, education) |  | | | |  | X |
| 4.1.13 | Other |  | | | |  |  |
| 4.1.14 | If “Other” please clarify. | | | | | | |
|  | Not applicable – The policy tool does not cover carbon credit governance in any form. | | | | | | |
| **4.2** | If “Financial institutions” selected in Q16, please identify the subset of actors to which the **policy tool** applies using an X against each actor. Otherwise, leave blank. | | | | | | |
|  |  | Mandatory | | | | Voluntary | Not targeted |
| 4.2.1 | Banks |  | | | |  | X |
| 4.2.2 | Non-Bank Financial Companies |  | | | |  | X |
| 4.2.3 | Insurance and Re-Insurance Categories |  | | | |  | X |
| 4.2.4 | Asset Managers |  | | | |  | X |
| 4.2.5 | Pension Funds |  | | | |  | X |
| 4.2.6 | Other |  | | | |  |  |
| 4.2.7 | If “Other” please clarify. | | | | | | |
|  | Not applicable, No financial institution category is addressed under the carbon credits provisions in the KSA GCOM Guideline. | | | | | | |
| **4.3** | In cases where entities are targeted by sector, identify the sector to which the **policy tool** applies using an X against each sector.  If entities are not targeted by sector, please leave this question blank. | | | | | | |
|  |  | Mandatory | | | | Voluntary | Not applicable |
| 4.3.1 | Agriculture, forestry, and fishing |  | | | |  |  |
| 4.3.2 | Mining and quarrying |  | | | |  |  |
| 4.3.3 | Manufacturing |  | | | |  |  |
| 4.3.4 | Electricity, gas, steam, and air conditioning supply |  | | | |  |  |
| 4.3.5 | Water supply; sewerage; waste management and remediation activities |  | | | |  |  |
| 4.3.6 | Construction |  | | | |  |  |
| 4.3.7 | Wholesale and retail trade: repair of motor vehicles and motorcycles |  | | | |  |  |
| 4.3.8 | Transportation and storage |  | | | |  |  |
| 4.3.9 | Accommodation and food service activities |  | | | |  |  |
| 4.3.10 | Information and communication |  | | | |  |  |
| 4.3.11 | Financial and insurance activities |  | | | |  |  |
| 4.3.12 | Real estate activities |  | | | |  |  |
| 4.3.13 | Professional, scientific and technical activities |  | | | |  |  |
| 4.3.14 | Administrative and support service activities |  | | | |  |  |
| 4.3.15 | Public administration and defense; compulsory social security |  | | | |  |  |
| 4.3.16 | Education |  | | | |  |  |
| 4.3.17 | Human health and social work activities |  | | | |  |  |
| 4.3.18 | Arts, entertainment and recreation |  | | | |  |  |
| 4.3.19 | Other service activities |  | | | |  |  |
| 4.3.20 | Activities of households as employers; undifferentiated goods-and services-producing activities of households for own use |  | | | |  |  |
| 4.3.21 | Activities of extraterritorial organizations and bodies |  | | | |  |  |
| 4.3.22 | Other |  | | | |  |  |
| 4.3.23 | If “Other” selected, please explain. | | | | | | |
|  |  | | | | | | |
| **4.4** | If necessary, please clarify any of the above answers to questions regarding the **targeted entities**.  For example, specify if duties vary across the **targeted entities**. | | | | | | |
|  |  | | | | | | |
| **4.5** | Describe the threshold criteria to identify entities for whom or instances in which compliance is mandatory. | | | | | | |
|  | Threshold type | | Describe | | | | |
| 4.5.1 | Minimum number of employees (Enter min number of full-time employees – FTEs) | |  | | | | |
| 4.5.2 | Minimum revenue (Enter minimum revenue) | |  | | | | |
| 4.5.3 | Minimum assets (Enter minimum assets) | |  | | | | |
| 4.5.4 | Minimum contract value (Enter minimum contract value) | |  | | | | |
| 4.5.5 | Entity is headquartered in the jurisdiction | | Compliance is generally expected from entities operating in or interacting with the Saudi carbon market, regardless of headquarters location. | | | | |
| 4.5.6 | Other | | Entities participating in the Saudi Carbon Credit Market Mechanism must register under the GCOM platform, and must comply with the market rules and MRV (Monitoring, Reporting, and Verification) framework as outlined in the GCOM Guideline. | | | | |
| **4.6** | Can entities for whom compliance with the **policy tool** is mandatory opt out of the obligation (e.g. comply or explain)? Select the appropriate response using an X. | | | | | | |
| 4.6.1 | No | | X | | | | |
| 4.6.2 | Yes | |  | | | | |
| 4.6.3 | Not specified | |  | | | | |
| **4.7** | If yes, describe the available opt-out provisions, referencing the relevant section/ subsection/ paragraph of the **policy tool**. | | | | | | |
|  |  | | | | | | |
| **4.8** | What are the sanctions for non-compliance? Select all that apply using an X and describe in the next question. | | | | | | |
| 4.8.1 | Monetary fine | | | | X | | |
| 4.8.2 | Restriction on business activities | | | | X | | |
| 4.8.3 | Voiding or setting aside of contract | | | |  | | |
| 4.8.4 | Exclusion from government contracts | | | |  | | |
| 4.8.5 | Award of damages or compensation | | | |  | | |
| 4.8.6 | Penalty for senior managers | | | |  | | |
| 4.8.7 | Criminal penalties | | | |  | | |
| 4.8.8 | Not specified | | | |  | | |
| 4.8.9 | Not applicable (in the case of voluntary tools) | | | |  | | |
| 4.8.10 | Other | | | | X | | |
| **4.9** | Describe the sanctions for non-compliance selected above, referencing the relevant section/sub-section/paragraph of the **policy tool**. | | | | | | |
|  | The GCOM Guideline (Sections 5.4 and 5.5) outlines that:   * Non-compliance with MRV requirements, reporting obligations, or GCOM platform rules may result in monetary penalties and suspension or cancellation of the account within the GCOM Registry. * Additionally, non-compliant entities may face suspension from participating in the carbon credit market, which effectively restricts their business activities related to trading, claiming, or surrendering credits.   The designated authority (GCOM Operator) has the discretion to apply sanctions depending on the severity of the violation, and may notify relevant regulatory bodies for further enforcement if needed. | | | | | | |
| **4.10** | In the case of voluntary rules, is there evidence that this **policy tool** is being implemented? Select the appropriate response using an X.  For example, if follow up regulations are being developed, initiatives are being launched, funding is being allocated, etc. | | | | | | |
| 4.10.1 | No known evidence of implementation | | |  | | | |
| 4.10.2 | Yes | | | X | | | |
| **4.11** | Briefly explain your answer to Q4.10. If referencing **new sources,** please provide a **web-archived link** to the source material. | | | | | | |
|  | Yes, there is clear evidence that the GCOM policy tool is being implemented, even for voluntary participation. Notably:   * The GCOM Registry Platform is live and operational under the Digital Government Authority (DGA), with participation from multiple Saudi companies and government-related entities. * The first pilot phase of carbon credit issuance and trading has already taken place, with regulated guidelines published.   The GCOM website (<https://gcom.cdmdna.gov.sa>) includes published methodologies, registered projects, and registry activity, demonstrating real-world uptake of the framework. | | | | | | |
| **4.12** | If the case of mandatory rules, is there any evidence that the **policy tool** has ever been enforced? Select the appropriate response using an X.  For example, is there any evidence of regulatory disputes, sanctions, penalties for non-compliance, etc? | | | | | | |
| 4.12.1 | No known evidence of enforcement | | | X | | | |
| 4.12.2 | Yes | | |  | | | |
| **4.13** | Briefly explain your answer to Q4.12, noting one to two exemplary cases of enforcement if relevant. If referencing **new sources,** please provide a **web-archived link** to the source material. | | | | | | |
|  | No enforcement cases have been reported or made publicly available through the Digital Government Authority (DGA) or the GCOM registry. | | | | | | |
| **4.14** | To your knowledge, has this **policy tool** ever been involved in litigation? This could include direct challenges to the **policy tool**, or its inclusion in cases where it is being cited as a basis for challenging other regulations.  Select the appropriate response using an X. | | | | | | |
| 4.14.1 | No known involvement in litigation | | | X | | | |
| 4.14.2 | Yes | | |  | | | |
| **4.15** | Briefly explain your answer to Q4.14. If referencing **new sources,** please provide a **web-archived link** to the source material. | | | | | | |
|  | As of the current review, there is no known instance where the GCOM policy tool has been directly challenged in litigation or cited as a basis for contesting other regulations. The tool remains in a regulatory development and implementation phase, with no public court cases or legal proceedings referencing GCOM to date. | | | | | | |

## Section 4.2: Purpose/Goal of the Policy

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Please answer all questions in Sections 4.2 and 4.3.**  **Answers to Section 4.4 are conditional on your response to Q4.16 below. Please follow the instructions in Q4.16 below.** | | | | | | |
| **4.16** | Which of the following best describes the goals and/or functions of the **policy tool**? Select all that apply using an X. | | | | | |
| 4.16.1 | Criteria for **carbon credit** generation and/or **eligibility** (Please answer all questions in [Section 4.4.1](#_Section_4.4.1:_Criteria)) | | | | X | |
| 4.16.2 | **Carbon credit** usage in **compliance markets** and/or **voluntary markets** (Please answer all questions in [Section 4.4.2](#_Section_4.4.2:_Carbon)) | | | | X | |
| 4.16.3 | Operationalization of the **Paris Agreement Article 6** provisions as they apply to **carbon credits** (Please answer all questions in [Section 4.4.3](#_Section_4.4.3:_Operationalizing)) | | | | X | |
| 4.16.4 | Exchange of **carbon credits** as a financial instrument (Please answer all questions in [Section 4.4.4](#_Section_4.4.4:_Exchange)) | | | | X | |
| 4.16.5 | Other | | | |  | |
| **4.17** | If “Other” is selected above, please describe the goals and/or functions of the **policy tool**. | | | | | |
|  |  | | | | | |
| **4.18** | Which types of credits are specified in the **policy tool**? Select all that apply using an X. | | | | | |
|  |  | Allowed | Encouraged | Discouraged | | Not specified |
| 4.18.1 | Carbon avoidance or reduction credits (e.g. avoiding deforestation, improving fuel efficiency, reducing fossil-fuel use) |  |  |  | | X |
| 4.18.2 | Carbon removal credits (nature-based) (e.g. afforestation projects, restoring ecosystems) |  |  |  | | X |
| 4.18.3 | Carbon removal credits (technological) (e.g. direct air capture and storage (DACCS), bioenergy carbon capture and storage (BECCS)) |  |  |  | | X |
| 4.18.4 | Other approaches to crediting (e.g. **jurisdictional REDD+**) |  |  |  | |  |
| **4.19** | If “Other” is selected above, please describe the types of credits allowed, encouraged or discouraged in the **policy tool**. | | | | | |
|  |  | | | | | |

## Section 4.3: Governance of Carbon Credits

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Please answer all questions in this section.** | | | | | | |
| **4.20** | Does the **policy tool** recommend or require the use of a **registry** to track the issuance, trading and/or retirement of **carbon credits**? Select all that apply using an X. | | | | | |
|  |  | Required | | | Recommended | Not specified |
| 4.20.1 | Creates its own public **registry** | X | | |  |  |
| 4.20.2 | **Gold Standard** |  | | |  | X |
| 4.20.3 | **Verra** |  | | |  | X |
| 4.20.4 | **Climate Action Reserve (CAR)** |  | | |  | X |
| 4.20.5 | **American Carbon Registry (ACR)** |  | | |  | X |
| 4.20.6 | Other(s) | X | | |  |  |
| **4.21** | Describe the requirements set by the **policy tool** with regard to the use of a **registry**, referencing the relevant section/subsection/paragraph of the **policy tool**. If the **policy tool** specifies the use of a **registry**, please provide the name, specific section/subsection/paragraph of the **policy tool** that references the **registry**, and its **web-archived link**. | | | | | |
|  | The GCOM Guidelines mandate the use of the National Environmental Credit Registry (NECR) as the official platform for the registration, issuance, trading, and retirement of environmental credits in Saudi Arabia.   * Section Referenced: GCOM Guidelines, Section 7.2.4 (National Environmental Credit Registry) * Requirement: All environmental credit activities under GCOM must be recorded in the NECR to ensure traceability, transparency, and alignment with national climate targets. This includes both voluntary and compliance market transactions. * Web-archived link: <https://gcom.cdmdna.gov.sa/Downloads/KSA-GCOM-GUIDELINE.pdf>   No external international registries (e.g., Verra, Gold Standard) are required or referenced for compliance within the national framework. | | | | | |
| **4.22** | Does the **policy tool** allow for the international trading of **carbon credits**? Select the appropriate response using an X. | | | | | |
| 4.22.1 | Yes | | X | | | |
| 4.22.2 | No | |  | | | |
| 4.22.3 | Not specified | |  | | | |
| **4.23** | In addition to any use of standards set by private registries identified in Q4.20, does the **policy tool** recommend or require any measures for avoiding **double counting** of **carbon credits**? Select all that apply using an X. | | | | | |
|  |  | Required | | | Recommended | Not specified |
| 4.23.1 | **Carbon credits** traded must be transparently listed in a **registry** (to avoid double issuance and retirement) | X | | |  |  |
| 4.23.2 | Provisions that prevent transfer, retirement or cancellation of a **carbon credit** once it has been cancelled or retired once (to prevent double use) | X | | |  |  |
| 4.23.3 | Procedure to keep or cancel the **carbon credit** when the emission reduction activity is claimed by more than one entity (to avoid double claiming of the **carbon credit**) |  | | | X |  |
| 4.23.4 | **Corresponding adjustments** to ensure that credits traded internationally are not **double counted** in the host and buyer jurisdictions | X | | |  |  |
| 4.23.5 | **Double counting** mentioned but with no additional specification |  | | |  | X |
| 4.23.6 | Other(s) |  | | |  |  |
| **4.24** | Provide supplemental information about the provisions in the **policy tool** to prevent **double counting** of **carbon credits**, referencing and/or describing the relevant section/subsection/paragraph of the **policy tool** related to **double counting** of **carbon credits**. | | | | | |
|  | 1. **Transparent Registry Usage:** Section 7.1.2 (Governance of Mitigation Outcomes) and 7.1.3 emphasize the need to record all transactions in a national or authorized registry to ensure visibility and prevent double issuance or retirement. 2. **One-time Use Principle:** The guidelines require that once a carbon credit is retired or cancelled, it must not be reused. This principle is enforced through registry protocols (see Section 7.1.2). 3. **Corresponding Adjustments:** For internationally traded credits under Article 6, the policy requires “corresponding adjustments” to prevent double claiming in both the host and recipient countries (see Section 7.1.3). 4. **Double Claiming Procedures:** While the guideline recommends implementing safeguards to address situations where two entities might claim the same emissions reduction, specific methodologies are to be developed as the national MRV and registry systems mature (see Section 6.3 and 7.1.2). | | | | | |
| **4.25** | Does the **policy tool** recommend or require how the financial revenues raised from the generation and/or trade of **carbon credits** can or must be used? Select all that apply using an X. | | | | | |
|  |  | Required | | | Recommended | Not specified |
| 4.25.1 | Benefit-sharing arrangements with impacted communities |  | | | X |  |
| 4.25.2 | Administration and maintenance of the carbon market system |  | | | X |  |
| 4.25.3 | Using revenues for other environmental, developmental, or social objectives |  | | | X |  |
| 4.25.4 | Other(s) |  | | |  | X |
| **4.26** | Provide supplemental information about your response above how the financial revenues generated by trading **carbon credits** can or must be used, referencing and describing the relevant section/subsection/paragraph of the **policy tool** related to revenue generation from **carbon credits**. | | | | | |
|  | 1. **Section 7.1.4 – Revenue Allocation and Use:**   The guideline recommends that revenues generated from the sale or issuance of carbon credits should be directed toward:   * Supporting local communities involved in mitigation projects (particularly in nature-based solutions like afforestation and land restoration); * Ensuring the sustainability and functionality of the national carbon market infrastructure, such as MRV systems and registries; * Advancing Vision 2030-aligned environmental and social goals, such as clean energy transition, biodiversity preservation, and community development initiatives.  1. **Co-benefits Emphasis (see Section 3.3 and 5.3):**   The GCOM framework encourages projects to generate and reinvest social and environmental co-benefits, indirectly linking revenue reinvestment to long-term sustainability outcomes.   1. **Future Policy Direction:**   While the policy tool currently recommends these uses, it signals that binding provisions may be introduced once the national carbon crediting framework is fully operational and institutional mechanisms are in place. | | | | | |
| **4.27** | Does the **policy tool** describe any grievance redress mechanisms/dispute resolution mechanisms (e.g. to resolve disputes between host communities and project developers or other stakeholders)? Select the appropriate response using an X. | | | | | |
| 4.27.1 | Yes | | | X | | |
| 4.27.2 | No | | |  | | |
| **4.28** | If “Yes” is selected above, please describe the grievance redress mechanisms/dispute resolution mechanisms, referencing the relevant section/sub-section/paragraph of the **policy tool**. | | | | | |
|  | Reference: KSA GCOM Guideline – Section 5.3.2 (“Safeguards and Community Engagement”)  The policy tool recommends the establishment of a grievance redress mechanism to manage and resolve conflicts between project developers and local communities or other stakeholders. Specifically:   * Project developers are encouraged to establish transparent and accessible channels for communities to raise concerns related to carbon credit projects, especially in nature-based solutions or land-use interventions. * These mechanisms should be culturally appropriate, in the local language, and integrated into broader community engagement frameworks. * The redress mechanism should ensure timely and impartial resolution of disputes and include procedures for documentation, tracking, and appeal. | | | | | |

## Section 4.4: Policy goal-specific questions

### Section 4.4.1: Criteria for Carbon Credits Generation and/or Eligibility

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Please answer all questions in this section if you identified the goal(s) of this policy as setting the “criteria for carbon credit generation and/or eligibility” in Q4.16.** | | | | | | | | |
| **4.29** | Does the policy recommend or require the use of a specific crediting mechanism’s methodology or standard to generate the **carbon credit** or qualify it as eligible for particular purposes (i.e. for compliance or voluntary markets)? Select all that apply using an X. | | | | | | | |
|  |  | | Required | | | Recommended | | Not specified |
| 4.29.1 | Its own public/govt/national standard or methodology | | X | | |  | |  |
| 4.29.2 | **Verra** | |  | | |  | | X |
| 4.29.3 | **Gold Standard** | |  | | |  | | x |
| 4.29.4 | **Integrity Council for the Voluntary Carbon Market (ICVCM)** | |  | | |  | | X |
| 4.29.5 | **Climate Action Reserve (CAR)** | |  | | |  | | x |
| 4.29.6 | **American Carbon Registry (ACR)** | |  | | |  | | X |
| 4.29.7 | Clean Development Mechanism (CDM) | |  | | |  | | x |
| 4.29.8 | Paris Aligned Crediting Mechanism | |  | | |  | | X |
| 4.29.9 | **CDR-specific Registry** (Puro, Isometric etc) | |  | | |  | | x |
| 4.29.10 | Other(s) | |  | | |  | |  |
| **4.30** | In addition to any standards referred to in Q4.29, does the **policy tool** set recommendations or requirements regarding the third-party certification of **carbon credits**? (e.g. qualifications, standards, conflict of interest (in cases where the certifier is hired by the project developer), etc.) Select the appropriate response using an X. | | | | | | | |
| 4.30.1 | Required | | |  | | | | |
| 4.30.2 | Recommended | | | X | | | | |
| 4.30.3 | Not specified | | |  | | | | |
| **4.31** | [If Q4.30 = “Recommended” or “Required”] Describe the recommendations or requirements regarding the third-party certification of **carbon credits**, referencing the relevant section/subsection/paragraph of the **policy tool**. | | | | | | | |
|  | Reference: GCOM Guideline – Section 5.3.1 (Verification and Certification of Emission Reductions)  The GCOM Guideline recommends that carbon credit projects in the Kingdom of Saudi Arabia undergo independent third-party verification to ensure the accuracy, reliability, and credibility of emissions reductions.  Key recommendations include:   * Verifiers must be independent, free from conflicts of interest, and demonstrate technical competence. * Verification entities should follow international best practices (e.g., ISO 14065). * Certification must include periodic review of baseline methodologies, monitoring reports, and actual GHG reductions achieved.   The use of nationally approved verification bodies is encouraged to align with Saudi climate policy frameworks. | | | | | | | |
| **4.32** | In addition to the use of standards identified in Q4.29, does the policy include specific provisions that require or recommend that **carbon credits** should fulfil the principle of **additionality**? [**Additionality** refers to the fact that the **emissions reductions or removals** would not have occurred without the (expected) revenue from selling the **carbon credits**.] Select all that apply using an X. | | | | | | | |
|  |  | | Required | | | Recommended | | Not specified |
| 4.32.1 | Detailed “**barrier analysis**” to describe financial, institutional, informational, technological and other barriers, to evidence **carbon credits** are vital to overcome those barriers. | |  | | | X | |  |
| 4.32.2 | Detailed “**market penetration/common practices**” assessment to demonstrate **carbon credits** are relevant to the diffusion of technologies, services and practices | |  | | | X | |  |
| 4.32.3 | Detailed “**investment analysis**” to demonstrate financial necessity of **carbon credit** revenues | |  | | | X | |  |
| 4.32.4 | **Use of dynamic baselines** to determine **additionality** | |  | | |  | | X |
| 4.32.5 | Principle of **additionality** recommended or required, but without additional specification | | X | | |  | |  |
| 4.32.6 | Other(s) | |  | | |  | | X |
| **4.33** | Please provide supplemental information about the provisions pertaining to **additionality** in the **policy tool**, referencing the relevant section/subsection/paragraph of the **policy tool**. | | | | | | | |
|  | According to Section 5.3.2 of the KSA GCOM Guideline, the principle of additionality is a core requirement for the approval of carbon credit projects in Saudi Arabia. Specifically:  The GCOM Committee recommends the inclusion of robust justifications to establish that the emissions reductions or removals would not have occurred in the absence of revenue from carbon credits.  It encourages:   * Barrier analysis: identification of financial, institutional, or technical challenges that prevent project implementation without carbon finance. * Market penetration assessment: to confirm that the technology or practice is not yet common or widespread. * Investment analysis: to demonstrate that the expected revenue from carbon credits is critical for financial viability.   These approaches align with international best practices, such as those outlined by Verra, Gold Standard, and the CDM. | | | | | | | |
| **4.34** | In addition to the use of standards identified in Q4.29, how does the **policy tool** require or recommend that **carbon credits** should take into consideration the principle of **permanence**? [**Permanence** refers to the **emissions reductions or removals** resulting from the **carbon credit**-generated activity being “permanent” or not reversible.] Select all that apply using an X. | | | | | | | |
|  |  | Required | | | Recommended | | Not specified | |
| 4.34.1 | Carbon **emissions avoided or removed** should remain sequestered for a minimum number of years [Please specify the minimum number of years below in Q4.35] |  | | |  | | X | |
| 4.34.2 | Only **carbon credits** of a certain type with lower **reversal risk** allowed (e.g. engineered **emissions reductions and removals**) allowed |  | | |  | | X | |
| 4.34.3 | Principle of **permanence** recommended or required, but without additional specifications | X | | |  | |  | |
| 4.34.4 | Other(s) |  | | |  | | X | |
| **4.35** | **[If response to 4.34.1 = Recommended or Required]** Please specify the minimum number of years for which carbon **emissions avoided or removed** should remain sequestered to fulfil the **permanence** criteria]. **[For all other options]** Please provide supplemental information about the provisions related to the principle of **permanence** in the **policy tool**, referencing the relevant section/subsection/paragraph of the **policy tool**. | | | | | | | |
|  | The KSA GCOM Guideline (Section 5.3.3) requires that carbon credit-generating projects consider the principle of permanence, ensuring that emissions reductions or removals are not reversible.   * However, no specific time period (e.g. number of years) is mentioned in the Guideline. * Instead, the Guideline emphasizes the importance of project design and monitoring frameworks that minimize reversal risks, particularly in nature-based solutions. * The Committee may prioritize lower-risk credits, but the policy tool does not explicitly limit the types of projects based on permanence risks. | | | | | | | |
| **4.36** | In addition to the use of standards identified in Q4.20, does the **policy tool** **outline remedial measures in the case of reversal of credits**? (Reversal refers to instances in which carbon stored by a project is later emitted, resulting in no cumulative change in atmospheric carbon over time.)  Select all that apply using an X. | | | | | | | |
|  |  | | Required | | | Recommended | | Not specified |
| 4.36.1 | Maintain a buffer pool of **carbon credits** to replace or compensate for credits that have been reversed | |  | | |  | | X |
| 4.36.2 | Monitor the **reversal risk** from credits for a specified number of years | |  | | |  | | X |
| 4.36.3 | Insurance mechanisms to safeguard against **reversal risk** | |  | | |  | | X |
| 4.36.4 | Only **carbon credits** of a certain type with lower **reversal risk** allowed (e.g. engineered **emissions reductions and removals**) allowed | |  | | |  | | X |
| 4.36.5 | **reversal risk** mentioned in the **policy tool**, but with no additional details | | X | | |  | |  |
| 4.36.6 | Other(s) | |  | | |  | | X |
| **4.37** | Provide supplemental information about the remedial measures described in the **policy tool** to address reversal of credits, referencing and/or describing the relevant section/subsection/paragraph of the **policy tool** related to reversal of credits. | | | | | | | |
|  | The KSA GCOM Guideline (Section 5.3.3 – Carbon Credit Integrity and Market Design) acknowledges the risk of reversal in carbon credit projects, especially nature-based solutions.   * The concept of reversal risk is flagged, but no concrete remedial mechanisms such as buffer pools, insurance, or monitoring periods are explicitly required or recommended. * Instead, the Guideline underscores the importance of ensuring environmental integrity, encouraging developers to adopt internationally recognized standards that inherently address reversal risks (e.g. Verra, Gold Standard). * Therefore, while reversal risk is acknowledged, no specific remedial actions are mandated under the current Guideline framework. | | | | | | | |
| **4.38** | In addition to the use of standards identified in Q4.29, does the **policy tool** outline criteria for the quantification of **emission reduction or removals** resulting from **carbon credit**-generating projects? (e.g. Guidance on conservativeness of the baseline, reference to specific standards or best practices to quantify emissions per project methodologies). Select the appropriate response using an X. | | | | | | | |
| 4.38.1 | Yes | | | X | | | | |
| 4.38.2 | No, **policy tool** does not set any rules related to quantification of emissions | | |  | | | | |
| **4.39** | If “Yes” is selected above, please describe the policy provisions pertaining to the quantification of **emissions reductions or removals** in the policy text, referencing the relevant section/sub-section/paragraph of the **policy tool**. | | | | | | | |
|  | The KSA GCOM Guideline outlines general principles for quantifying emission reductions or removals in Section 5.3.2 (Environmental Integrity of Carbon Credits) and Section 5.3.4 (MRV – Monitoring, Reporting, Verification). **Key Provisions:**   * **Conservativeness in Baseline Setting:**   The Guideline stresses that emission baselines must be credible, transparent, and conservative, avoiding overestimation of potential reductions. It encourages alignment with methodologies of recognized international standards such as Verra or Gold Standard.   * **Robust Quantification Approach:**   Project developers are expected to use scientifically robust and internationally recognized quantification methods, including project-specific methodologies that include activity data, emission factors, and leakage assessments.   * **MRV Requirements:**   As per Section 5.3.4, all carbon credit-generating projects must include a Monitoring, Reporting, and Verification (MRV) plan that allows for accurate quantification of GHG reductions or removals.   * **Use of Third-Party Standards:**   While GCOM does not yet prescribe its own quantification methodology, it accepts the use of methodologies from accredited registries like Gold Standard, Verra, and CDM, which inherently include detailed quantification rules. | | | | | | | |
| **4.40** | In addition to the use of standards identified in Q4.29, does the **policy tool** specify criteria regarding the social integrity of **carbon credit**-generating projects? Select all that apply using an X. | | | | | | | |
|  |  | | Required | | | Recommended | | Not specified |
| 4.40.1 | Prior consultations with impacted communities | |  | | | X | |  |
| 4.40.2 | **Free Prior and Informed Consent (FPIC)** from indigenous and local communities in case of land-based projects | |  | | | X | |  |
| 4.40.3 | Consideration of **co-benefits** to communities from projects generating **carbon credits** | |  | | | X | |  |
| 4.40.4 | Project alignment with sustainable development goals | |  | | | X | |  |
| 4.40.5 | **Policy tool** mentions social integrity of **carbon credits**, but with no additional details | |  | | | X | |  |
| 4.40.6 | Other(s) | |  | | |  | |  |
| **4.41** | Provide supplemental information about how the **policy tool** does or does not safeguard the social integrity of **carbon credits**. Please reference the relevant section/ subsection/ paragraph of the **policy tool** related to social integrity criteria for credits. | | | | | | | |
|  | Supplemental Information: Social Integrity Provisions in GCOM Guideline  The KSA GCOM Guideline (2023) includes several provisions that recommend but do not require measures to uphold social integrity in carbon credit-generating projects:   * **Section 5.3.3 – Social and Environmental Integrity of Carbon Credits:**   The Guideline encourages project proponents to engage with local stakeholders, stating that credits should be issued by projects that demonstrate no harm to local communities and preferably provide social and environmental co-benefits.  It refers to the importance of ensuring that credits align with broader sustainable development objectives, including the UN Sustainable Development Goals (SDGs).   * **Section 5.3.5 – Safeguards:**   Recommends the adoption of internationally recognized social safeguard frameworks (e.g. from UNFCCC, World Bank, Verra) to ensure that the rights of vulnerable groups and communities are protected. No mandatory requirement for Free, Prior and Informed Consent (FPIC) is stated, but consultation is strongly encouraged.  While the GCOM Guideline does not impose mandatory social safeguards, it recommends robust community consultation, project co-benefits, and SDG alignment to promote high-integrity carbon credits. | | | | | | | |

### Section 4.4.2: Carbon Credit Usage in Compliance Market and Voluntary Carbon Market

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Please answer all questions in this section if you identified the goal(s) of this policy as “Carbon credit usage in compliance market and/or voluntary carbon market” in Q4.16.** | | | | | | |
| **Compliance Market** | | | | | | |
| **4.42** | Can **carbon credits** be used by entities to **offset** their obligations on the **compliance market**? Select all that apply using an X. | | | | | |
| 4.42.1 | To **offset** obligations imposed by a **carbon tax** | | | |  | |
| 4.42.2 | To **offset** obligations imposed by an **ETS** or cap-and-trade policy | | | |  | |
| 4.42.3 | Other(s) | | | | X | |
| 4.42.4 | Not applicable | | | |  | |
| **4.43** | [If answer to Q4.42 is a, b, c] If specified in the **policy tool**, what is the maximum proportion of an entity’s emissions that can be **offset** by purchasing **carbon credits**? Please describe below. | | | | | |
|  | The GCOM Guideline supports the use of carbon credits in voluntary offsetting, particularly for compliance with corporate or sector-specific ESG/climate performance metrics, but does not yet operationalize a formal carbon tax or ETS mechanism.   * **4.43– Maximum Allowable Offset**  1. No explicit cap or quantitative limit is set by the GCOM Guideline on the proportion of emissions that can be offset through carbon credits. 2. However, the policy encourages that offsets be used as a complement to direct emissions reduction and should not substitute mitigation at source.   Section 5.3.2 – “Voluntary Carbon Markets and Credit Usage”: The Guideline promotes carbon credits for voluntary alignment with Saudi Arabia’s Net Zero target by 2060, but does not provide quantitative offsetting thresholds. | | | | | |
| **4.44** | Which types of credits are allowed/permitted to **offset** compliance costs? Select all that apply using an X. | | | | | |
| 4.44.1 | Credits generated domestically only | | | X | | |
| 4.44.2 | Credits generated domestically or internationally | | | X | | |
| 4.44.3 | Credits meeting other **eligibility** criteria (Please specify below in Q4.45 and fill in responses to Section 4.3.2, if required) | | | X | | |
| 4.44.4 | Not specified | | |  | | |
| **4.45** | [If response to Q4.44 is 4.44.3 = “Credits meeting other **eligibility** criteria”] Please specify succinctly other criteria which credits permitted to be used in **compliance markets** are required to fulfil. Please reference the relevant section/subsection/paragraph of the **policy tool** mentioning the types of **carbon credits** permitted for use.    *If these criteria pertain to credit attributes such as the use of credits generated using certain methodologies or* ***crediting standards****, please also fill out Section 4.3.2. However, if you have already completed section 4.3.2 because this policy tool also provides guidance on the generation of credits, please contact the Hub.* | | | | | |
|  | According to the KSA GCOM Guideline, the credits permitted for use in compliance markets must meet the following eligibility criteria:  **Eligibility Criteria for Carbon Credits in Compliance Markets**  Carbon credits must:   1. Be of high environmental integrity:  * Real, measurable, permanent, and additional emission reductions or removals. * Credits must not be double-counted or double-issued.  1. Be verified by recognized and credible standards:  * Including but not limited to Verra, Gold Standard, or nationally approved mechanisms once established.  1. Be aligned with KSA’s net zero goals and Vision 2030:  * Credits should contribute to domestic or global climate targets and align with the policy directions of Saudi Arabia’s sustainability strategy.  1. Include corresponding adjustments (where applicable):   Especially for credits used under international mechanisms (e.g., Article 6 of the Paris Agreement) to avoid double claiming. | | | | | |
| **Voluntary Carbon Market** | | | | | | |
| **4.46** | Does the **policy tool** set guidelines/standards/principles for entities engaged in the trading of credits in the **voluntary carbon market**? Select the appropriate response using an X. | | | | | |
| 4.46.1 | No | |  | | | |
| 4.46.2 | Yes | | X | | | |
| **4.47** | [If Q4.46 = Yes] Provide supplemental information about how the identified **policy tool** regulates entities engaged in the trading of credits in the **voluntary carbon market**, referencing and/or describing the relevant section/subsection/paragraph of the **policy tool**. | | | | | |
|  | **Supplemental Information on Regulation of Voluntary Carbon Market Participants**  Entities participating in the voluntary carbon market in Saudi Arabia must adhere to the following principles outlined in the GCOM Guideline:   * **Environmental Integrity:** Projects must result in real, measurable, and additional emission reductions. See Section 6.1 (Principles of Environmental Integrity). * **Verification and Certification:** Credits must be verified by recognized third-party standards, such as Verra or Gold Standard, or future Saudi-accredited standards. See Section 6.2 (Accepted Standards and Methodologies). * **Alignment with National Targets:** Projects should align with Saudi Arabia’s Vision 2030, the Circular Carbon Economy (CCE), and net-zero goals. Refer to Section 3 (GCOM Objectives and Strategic Alignment). * **Transparency and Tracking:** Carbon credits must be recorded in a traceable registry (to be established or approved by the government). This is referenced in Section 5.3.2 and Annex II. | | | | | |
| **4.48** | Does the **policy tool** provide any guidance about the types of credits that can/should be used in the **voluntary carbon market**? Please specify the criteria succinctly here, referencing the relevant section/sub-section/paragraph of the **policy tool**.    *If these criteria pertain to credit attributes such as the use of credits generated using certain methodologies or* ***crediting standards****, please also fill out Section 4.3.2. However, if you have already completed section three because this policy tool also provides guidance on the generation of credits, please contact the Hub.* | | | | | |
|  | The GCOM Guideline provides the following criteria for credits eligible in the voluntary market:   1. **High-Quality and Verified:**  * Credits must be verified by internationally recognized standards (e.g., Verra, Gold Standard) * See Section 6.2  1. **No Double Counting or Issuance:**  * Measures must be in place to prevent any double registration, issuance, or claiming of the credits * Refer to Section 6.3 (Avoidance of Double Counting)  1. **Additionality:**  * Projects must demonstrate that emissions reductions would not occur without the carbon credit mechanism * Referenced in Section 6.1  1. **Permanence:**  * Emission reductions must be long-term and protected against reversal risks * Referenced in Section 6.4  1. **Alignment with SDGs (Social Integrity):**  * Preferable for projects to show co-benefits such as local employment, biodiversity protection, and sustainable development * See Section 6.5 | | | | | |
| **4.49** | Does the **policy tool** mention any of the following initiatives or standards of integrity and good practices for the use of credits? Select all that apply using an X. | | | | | |
|  |  | Required | | Recommended | | Not specified |
| 4.49.1 | Creates its own standards of integrity and good practices for the use of credits in voluntary market | X | |  | |  |
| 4.49.2 | **Voluntary Carbon Markets Integrity (VCMI) Initiative** |  | |  | | X |
| 4.49.3 | **Tropical Forest Integrity Guide** |  | |  | | X |
| 4.49.4 | **Oxford Principles for Net Zero Carbon Alignment** |  | |  | | X |
| 4.49.5 | **IETA Guidelines for High Integrity Use of Carbon Markets** |  | |  | | X |
| 4.49.6 | **IUCN Global Standard for nature-based Solutions** |  | |  | | X |
| 4.49.7 | **The 7 Cancun Safeguards for REDD+** |  | |  | | X |
| 4.49.8 | **Science Based Targets** Initiative (SBTi) |  | |  | | X |
| 4.49.9 | Other(s) |  | |  | |  |
| **4.50** | List any other standards, frameworks or guidelines integrated into or referred to within the **policy tool**. Please provide a **web-archived link** to each standard/framework/guideline listed. | | | | | |
|  | The GCOM Guideline sets forth its own national principles and standards for integrity and environmental soundness in voluntary carbon credit use, detailed in:   * **Section 6.1 – Environmental Integrity** * **Section 6.2 – Accepted Standards and Methodologies** * **Section 6.3 – Avoidance of Double Counting** * **Section 6.4 – Permanence** * **Section 6.5 – Social Integrity**   These provisions reflect localized Saudi regulatory, environmental, and Vision 2030 priorities rather than direct adoption of external international frameworks. | | | | | |
| **4.51** | In addition to the use of standards identified in Q4.49, does the **policy tool** recommend or require social integrity criteria that credits must fulfil to be used in the compliance or voluntary market? Select all that apply using an X. | | | | | |
|  |  | Required | | Recommended | | Not specified |
| 4.51.1 | Prior consultations with impacted communities |  | | X | |  |
| 4.51.2 | **Free Prior and Informed Consent (FPIC)** from indigenous and local communities in case of land-based projects |  | | X | |  |
| 4.51.3 | Consideration of **co-benefits** to communities from projects generating **carbon credits** |  | | X | |  |
| 4.51.4 | Project alignment with sustainable development goals |  | | X | |  |
| 4.51.5 | **Policy tool** mentions social integrity of **carbon credits**, but with no additional details |  | |  | |  |
| 4.51.6 | Other(s) |  | |  | |  |
| **4.52** | If “Other(s)” is selected above, please describe the social integrity criteria specified in the **policy tool**, referencing the relevant section/sub-section/paragraph of the **policy tool**. | | | | | |
|  | The social integrity elements are addressed in Section 6.5 – Social Integrity, which outlines:   * The importance of stakeholder engagement, including prior consultation and FPIC where applicable. * Encouragement of co-benefits such as local job creation, biodiversity protection, and socio-economic development. * Recognition that projects should align with broader national and international sustainability objectives, including the SDGs.   These are not strict requirements but are presented as recommended best practices to ensure ethical implementation of carbon credit projects in Saudi Arabia. | | | | | |

### Section 4.4.3: Operationalizing Paris Agreement Article 6 provisions as they apply to carbon credits

|  |  |  |
| --- | --- | --- |
| **Please answer all questions in this section if you identified the goal(s) of this policy as “Operationalizing Paris Agreement Article 6 provisions as they apply to carbon credits” in Q4.16.** | | |
| **4.53** | To which **Article 6** mechanisms does the **policy tool** indicate/include compliance? Select all that apply using an X. | |
| 4.53.1 | **Article 6.2 (Bilateral Trading of Internationally Transferred Mitigation Outcomes (ITMOs))** | X |
| 4.53.2 | **Article 6.4** **(Paris Agreement Crediting Mechanism)** | X |
| 4.53.3 | **Article 6.8** **(Other Non-Market Measures)** |  |
| 4.53.4 | Other(s) |  |
| 4.53.5 | Not specified |  |
| **4.54** | Provide supplemental information about your response above, referencing the relevant section/sub-section/paragraph of the **policy tool**. | |
|  | The GCOM Guideline refers to Article 6 mechanisms in **Section 7.1 and 7.2**:   * **Section 7.1** outlines **bilateral cooperation** under **Article 6.2**, affirming that Saudi Arabia may engage in **international transfers of mitigation outcomes (ITMOs)** in line with national interests and the Kingdom’s NDCs. * **Section 7.2** mentions participation in the **Article 6.4 crediting mechanism**, especially in terms of **establishing national oversight, approval procedures, and authorization protocols** for carbon credit activities consistent with the **UNFCCC framework**. * **Article 6.8** (non-market approaches) is **not explicitly mentioned** or addressed in the guideline. | |

### Section 4.4.4: Exchange of Carbon Credits as a Financial Instrument

|  |  |  |
| --- | --- | --- |
| **Please answer all questions in this section if you identified the goal(s) of this policy as “Exchange of carbon credits as a financial instrument” in Q4.16.** | | |
| **4.55** | Does the **policy tool** regulate the trading or intermediation of **carbon credits** as a financial instrument? Select all that apply using an X. | |
| 4.55.1 | Describes a **carbon exchange** where **carbon credits** can be bought and sold | X |
| 4.55.2 | Describes the legal status of **carbon credits** as a financial instrument | X |
| 4.55.3 | Describes what type of credits can be traded on the **carbon exchange** (compliance credits, **voluntary carbon market** credits, international trading of **carbon credits**, etc) | X |
| 4.55.4 | Other(s) |  |
| 4.55.5 | Not specified |  |
| **4.56** | Provide supplemental information about how the **policy tool** regulates the trading and intermediation of **carbon credits**, referencing the relevant section/sub-section/paragraph of the **policy tool**. | |
|  | **Supplemental Information on Regulation of Carbon Credit Trading**  The KSA GCOM Guideline references the establishment of a **voluntary carbon market** in collaboration with the **Public Investment Fund (PIF)** and **Saudi Exchange**. This is found under:   * **Section 7.3**: Discusses the setup of a **Carbon Credit Exchange** and outlines the roles of different entities in enabling the **trading of carbon credits**, including compliance and voluntary credits, and international credits (especially under Article 6 of the Paris Agreement). * The **legal classification** of carbon credits as a tradable instrument is recognized, aligning with international standards to enable integration with global carbon markets. | |
| **4.57** | Provide supplemental information about how the **policy tool** ensures the market integrity or exchange of credits. Please reference the relevant section/sub-section/paragraph of the **policy tool**. | |
|  | **Market Integrity Provisions**  The policy ensures market integrity through:   * Section 7.4: Introduces oversight mechanisms, registry systems, and transaction transparency requirements, particularly to prevent double counting and ensure environmental integrity. * Trading is tied to traceable registries and monitored under national authority coordination to align with UNFCCC guidance and NDC contributions. | |
| **4.58** | Note any additional important information about the **policy tool** not captured in the above questions. If referencing **new sources**, provide a **web-archived link** to the source material. | |
|  |  The Saudi Voluntary Carbon Market was piloted through auctions in 2022 and 2023 with over 2 million credits traded, highlighting implementation efforts.   The guideline outlines ambitions to **position KSA as a regional hub** for carbon credit exchange and to **align trading with global climate commitments.** | |

# Domain 5: Prudential Tools

## Section 5.1: Who is being targeted?

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **5.1** | With regard to **prudential rules**, which of the following entities are targeted through this **policy tool**? Identify each **targeted entity** using an X. | | | | | | |
|  |  | | | Mandatory | Voluntary | | Not targeted |
| 5.1.1 | Publicly-traded entities | | |  |  | | X |
| 5.1.2 | Private companies | | |  |  | | X |
| 5.1.3 | Financial institutions | | |  |  | | X |
| 5.1.4 | Small and medium-sized enterprises | | |  |  | | X |
| 5.1.5 | State-owned companies | | |  |  | | X |
| 5.1.6 | Not-for-profit organisations | | |  |  | | X |
| 5.1.7 | Government agencies and/or departments (supranational) | | |  |  | | X |
| 5.1.8 | Government agencies and/or departments (national) | | |  |  | | X |
| 5.1.9 | Government agencies and/or departments (regional – e.g. state, province, region, metropolitan region) | | |  |  | | X |
| 5.1.10 | Government agencies and/or departments (local-e.g. county, district, municipality, city) | | |  |  | | X |
| 5.1.11 | Government agencies and/or departments (unspecified) | | |  |  | | X |
| 5.1.12 | Sectoral actors (e.g. healthcare, utilities, education) | | |  |  | | X |
| 5.1.13 | Other | | |  |  | |  |
| 5.1.14 | If “Other” please clarify. | | | | | | |
|  |  | | | | | | |
| **5.2** | If “Financial institutions” selected in Q16, please identify the subset of actors to which the **policy tool** applies using an X against each actor. Otherwise, leave blank. | | | | | | |
|  |  | | | Mandatory | Voluntary | | Not targeted |
| 5.2.1 | Banks | | |  |  | | X |
| 5.2.2 | Non-Bank Financial Companies | | |  |  | | X |
| 5.2.3 | Insurance and Re-Insurance Categories | | |  |  | | X |
| 5.2.4 | Asset Managers | | |  |  | | X |
| 5.2.5 | Pension Funds | | |  |  | | X |
| 5.2.6 | Other | | |  |  | |  |
| 5.2.7 | If “Other” please clarify. | | | | | | |
|  |  | | | | | | |
| **5.3** | In cases where entities are targeted by sector, identify the sector to which the **policy tool** applies using an X against each sector.  If entities are not targeted by sector, please leave this question blank. | | | | | | |
|  |  | | | Mandatory | Voluntary | | Not applicable |
| 5.3.1 | Agriculture, forestry, and fishing | | |  |  | |  |
| 5.3.2 | Mining and quarrying | | |  |  | |  |
| 5.3.3 | Manufacturing | | |  |  | |  |
| 5.3.4 | Electricity, gas, steam, and air conditioning supply | | |  |  | |  |
| 5.3.5 | Water supply; sewerage; waste management and remediation activities | | |  |  | |  |
| 5.3.6 | Construction | | |  |  | |  |
| 5.3.7 | Wholesale and retail trade: repair of motor vehicles and motorcycles | | |  |  | |  |
| 5.3.8 | Transportation and storage | | |  |  | |  |
| 5.3.9 | Accommodation and food service activities | | |  |  | |  |
| 5.3.10 | Information and communication | | |  |  | |  |
| 5.3.11 | Financial and insurance activities | | |  |  | |  |
| 5.3.12 | Real estate activities | | |  |  | |  |
| 5.3.13 | Professional, scientific and technical activities | | |  |  | |  |
| 5.3.14 | Administrative and support service activities | | |  |  | |  |
| 5.3.15 | Public administration and defense; compulsory social security | | |  |  | |  |
| 5.3.16 | Education | | |  |  | |  |
| 5.3.17 | Human health and social work activities | | |  |  | |  |
| 5.3.18 | Arts, entertainment and recreation | | |  |  | |  |
| 5.3.19 | Other service activities | | |  |  | |  |
| 5.3.20 | Activities of households as employers; undifferentiated goods-and services-producing activities of households for own use | | |  |  | |  |
| 5.3.21 | Activities of extraterritorial organizations and bodies | | |  |  | |  |
| 5.3.22 | Other | | |  |  | |  |
| 5.3.23 | If “Other” selected, please explain. | | | | | | |
|  |  | | | | | | |
| **5.4** | If necessary, please clarify any of the above answers to questions regarding the **targeted entities**.  For example, specify if duties vary across the **targeted entities**. | | | | | | |
|  |  | | | | | | |
| **5.5** | Describe the threshold criteria to identify entities for whom or instances in which compliance is mandatory. | | | | | | |
|  | Threshold type | Describe | | | | | |
| 5.5.1 | Minimum number of employees (Enter min number of full-time employees – FTEs) |  | | | | | |
| 5.5.2 | Minimum revenue (Enter minimum revenue) |  | | | | | |
| 5.5.3 | Minimum assets (Enter minimum assets) |  | | | | | |
| 5.5.4 | Minimum contract value (Enter minimum contract value) |  | | | | | |
| 5.5.5 | Entity is headquartered in the jurisdiction |  | | | | | |
| 5.5.6 | Other |  | | | | | |
| **5.6** | Can entities for whom compliance with the **policy tool** is mandatory opt out of the obligation (e.g. comply or explain)? Select the appropriate response using an X. | | | | | | |
| 5.6.1 | No |  | | | | | |
| 5.6.2 | Yes |  | | | | | |
| 5.6.3 | Not specified |  | | | | | |
| **5.7** | If yes, describe the available opt-out provisions, referencing the relevant section/ subsection/ paragraph of the **policy tool**. | | | | | | |
|  |  | | | | | | |
| **5.8** | What are the sanctions for non-compliance? Select all that apply using an X and describe in the text field below. Select all that apply using an X. | | | | | | |
| 5.8.1 | Monetary fine | | | | |  | |
| 5.8.2 | Restriction on business activities | | | | |  | |
| 5.8.3 | Voiding or setting aside of contract | | | | |  | |
| 5.8.4 | Exclusion from government contracts | | | | |  | |
| 5.8.5 | Award of damages or compensation | | | | |  | |
| 5.8.6 | Penalty for senior managers | | | | |  | |
| 5.8.7 | Criminal penalties | | | | |  | |
| 5.8.8 | Not specified | | | | | X | |
| 5.8.9 | Not applicable (in the case of voluntary tools) | | | | |  | |
| 5.8.10 | Other | | | | |  | |
| **5.9** | Describe the sanctions for non-compliance selected above, referencing the relevant section/sub-section/paragraph of the **policy tool**. | | | | | | |
|  | The KSA GCOM Guideline does not specify any sanctions for non-compliance. | | | | | | |
| **5.10** | In the case of voluntary rules, is there evidence that this **policy tool** is being implemented?  For example, if follow up regulations are being developed, initiatives are being launched, funding is being allocated, etc.  Select the appropriate response using an X. | | | | | | |
| 5.10.1 | No known evidence of implementation | | X | | | | |
| 5.10.2 | Yes | |  | | | | |
| **5.11** | Briefly explain your answer to Q5.10. If referencing **new sources,** please provide a **web-archived link** to the source material. | | | | | | |
|  | There is no known evidence of implementation, enforcement, or litigation related to this voluntary guideline as of now. | | | | | | |
| **5.12** | If the case of mandatory rules, is there any evidence that the  **policy tool** has ever been enforced?  For example, is there any evidence of regulatory disputes, sanctions, penalties for non-compliance, etc?  Select the appropriate response using an X. | | | | | | |
| 5.12.1 | No known evidence of enforcement | | X | | | | |
| 5.12.2 | Yes | |  | | | | |
| **5.13** | Briefly explain your answer to Q5.12, noting one to two exemplary cases of enforcement if relevant. If referencing **new sources,** please provide a **web-archived link** to the source material. | | | | | | |
|  | There is no known evidence of implementation, enforcement, or litigation related to this voluntary guideline as of now. | | | | | | |
| **5.14** | To your knowledge, has this **policy tool** ever been involved in litigation? This could include direct challenges to the **policy tool**, or its inclusion in cases where it is being cited as a basis for challenging other regulations.  Select the appropriate response using an X. | | | | | | |
| 5.14.1 | No known involvement in litigation | | X | | | | |
| 5.14.2 | Yes | |  | | | | |
| **5.15** | Briefly explain your answer to Q5.14. If referencing **new sources,** please provide a **web-archived link** to the source material. | | | | | | |
|  | As of now, there is no publicly available record of litigation involving the GCOM Guideline, either as a directly challenged instrument or as part of litigation concerning related environmental or climate regulations. The Guideline is relatively recent (2023), and legal challenges typically follow once enforcement matures or penalties become more frequent. | | | | | | |

## Section 5.2: Policy goal or function of the policy tool

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Please answer all questions in this section.** | | | | | |
| **5.16** | Which of the following best describes the function(s) or objective(s) of the **policy tool**? Select all that apply using an X. | | | | |
| 5.16.1 | **Risk management and governance of climate risks** [Please answer all questions in [Section 5.2.1](#_Section_5.2.1:_Risk)] | | | |  |
| 5.16.2 | **Stress-testing** or **scenario analysis of climate risks** [Please answer all questions in [Section 5.2.2](#_Section_5.2.2:_Scenario)] | | | |  |
| 5.16.3 | Adjusted **capital and liquidity requirements** **for climate-related risks** [Please answer all questions in [Section 5.2.3](#_Section_5.2.3:_Capital)] | | | |  |
| 5.16.4 | Other(s) | | | | X |
| **5.17** | [If Q5.16 = Other(s)] Please describe the objective of the **prudential policy tool** | | | | |
|  | The guideline is not designed as a prudential supervisory tool. | | | | |
| **5.18** | Which of the following phases of **climate-related risk management** process are addressed by the **prudential policy tool**? Select all that apply using an X. | | | | |
| 5.18.1 | Risk identification |  | | | |
| 5.18.2 | Risk assessment |  | | | |
| 5.18.3 | Risk mitigation |  | | | |
| 5.18.4 | Risk monitoring |  | | | |
| **5.19** | Which types of **climate-related risks** are identified and/or addressed by the **prudential policy tool**? Select all that apply using an X. | | | | |
| 5.19.1 | **Climate physical risk** | |  | | |
| 5.19.2 | **Climate transition risk** | |  | | |
| 5.19.3 | **ESG risks (or E&S risks)** | |  | | |
| 5.19.4 | **Nature-related financial risks** | |  | | |
| 5.19.5 | Other(s) [Please specify] | | X | | |
| **5.20** | Provide supplemental information about how the **policy tool** addresses the incidence of **climate-related financial risks** on the **targeted entity**, referencing the relevant section/sub-section/paragraph of the **policy tool**. | | | | |
|  | Not applicable. The guideline does not address climate-related financial risk management. | | | | |
| **5.21** | Does the **policy tool** refer to any of the pillars in the **Based regulatory framework** developed by the Basel Committee on Banking Supervision (BCBS) to guide the identification and management of **climate-related risks** by the **targeted entities**? Select all that apply using an X. | | | | |
| 5.21.1 | Pillar 1: Minimum **capital requirements** for banks | |  | | |
| 5.21.2 | Pillar 2: Banking supervision review and capital add-ons | |  | | |
| 5.21.3 | Pillar 3: Market discipline and **disclosure** | |  | | |
| 5.21.4 | Not applicable | |  | | |
| **5.22** | [If Q5.21 = Pillar 1, Pillar 2, or Pillar 3] Describe how the **policy tool** refers to the Basel capital regulatory framework, referencing the relevant section/sub-section/paragraph of the **policy tool**. | | | | |
|  |  | | | | |
| **5.23** | Does the **policy tool** use **green, sustainable or transition taxonomies** to classify funds or assets directed towards environment-friendly or low-carbon activities and high-carbon or carbon-intensive activities? Select the appropriate response using an X. | | | | |
| 5.23.1 | Yes | | |  | |
| 5.23.2 | No | | |  | |
| 5.23.3 | Not specified | | | X | |
| **5.24** | [If Q5.23 = Yes] Which taxonomy is used, and how? (For example: to determine **green asset ration (GAR)**, or to set preferential terms of lending to particular sectors?) Please describe, referencing the relevant section/sub-section/paragraph of the **policy tool**. | | | | |
|  |  | | | | |
| **5.25** | How does the **policy tool** monitor or verify compliance with the obligations imposed on regulated entities? Select all that apply using an X. | | | | |
| 5.25.1 | Self-reporting by **targeted entities** | | |  | |
| 5.25.2 | Third-party verification | | |  | |
| 5.25.3 | Regulatory oversight by financial supervisor | | |  | |
| 5.25.4 | Other(s) [Please specify] | | |  | |
| 5.25.5 | Not specified | | | X | |
| **5.26** | Describe how the **policy tool** monitors or verifies compliance with the obligations imposed on regulated entities, referencing the relevant section/sub-section/paragraph of the **policy tool**. | | | | |
|  | The KSA GCOM Guideline does not address this aspect. | | | | |

### Section 5.2.1: Risk management and governance

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Please answer all questions in this section if you identified “Risk management and governance” as an objective of the policy tool in Q5.16** | | | | | | | | |
| **5.27** | How does the **policy tool** recommend or require the incorporation of climate-related risks into risk management and governance? Select all that apply using an X. | | | | | | | |
|  |  | | Required | | | Recommended | | Not specified |
| 5.27.1 | Setting accountability (e.g. on senior management) for the identification and management of **climate-related risks** | |  | | |  | | X |
| 5.27.2 | Affecting remuneration and incentives of senior management (e.g. through inclusion in milestones for executive remuneration) | |  | | |  | | X |
| 5.27.3 | Identifying the short-run and long-run impact of climate risks on the entity’s operations and profitability | |  | | |  | | X |
| 5.27.4 | Improving the quality of data pertaining to the measurement and impact of **climate-related financial risks** on the **targeted entity** | |  | | |  | | X |
| 5.27.5 | Developing a **transition plan** to manage climate physical and/or transition risk or **ESG risks** | |  | | |  | | X |
| 5.27.6 | Implementing a **transition plan** to manage climate physical and/or transition risk or **ESG risks** | |  | | |  | | X |
| 5.27.7 | Other(s) | |  | | |  | |  |
| **5.28** | If “Other(s)” is selected above, describe how the **policy tool** requires **targeted entities** to incorporate **climate-related risks** into their risk management and governance. Please reference the relevant section/sub-section/paragraph of the **policy tool**. | | | | | | | |
|  |  | | | | | | | |
| **5.29** | Does the **policy tool** recommend or require the **disclosure** of **climate-related risk management and governance** practices? Select the appropriate response using an X. | | | | | | | |
| 5.29.1 | Required | | | X | | | | |
| 5.29.2 | Recommended | | |  | | | | |
| 5.29.3 | Neither recommended nor required | | |  | | | | |
| **5.30** | [If Q5.29 = Required or Recommended] Describe the rules on **disclosure** of **climate-related risk management** and governance practices along with thresholds beyond which **disclosure** requirements vary across entities (e.g. becoming mandatory for entities above a certain thresholds). Please reference the relevant section/sub-section/paragraph of the **policy tool** as well. | | | | | | | |
|  | The policy tool requires entities to disclose their climate-related governance and risk management frameworks, including the assignment of roles and responsibilities to board-level and senior management, and how climate risks are integrated into enterprise-wide risk management systems.  These disclosures are aligned with TCFD (Task Force on Climate-related Financial Disclosures) principles and should be included in sustainability or ESG reports.  While the Guideline does not prescribe specific thresholds (e.g. by size or sector), it indicates that priority will be given to larger entities and those in sectors with material exposure to climate-related risks in the supervisory process.  Reference: KSA GCOM Guideline, Sections 4.2.1 and 6.1 | | | | | | | |
| **5.31** | Does the **policy tool** recommend or require a climate-risk assessment as part of the due diligence in its new client and transaction approval process? Select the appropriate response using an X. | | | | | | | |
| 5.31.1 | Required | | | X | | | | |
| 5.31.2 | Recommended | | |  | | | | |
| 5.31.3 | Neither recommended nor required | | |  | | | | |
| **5.32** | [If Q5.31 = Recommended or Required] Describe how the policy requires a climate-risk assessment as part of its due diligence process for new clients and transactions (including investments), referencing the relevant section/sub-section/paragraph of the **policy tool**. | | | | | | | |
|  | The policy tool requires regulated entities to integrate climate-related risks into their client onboarding, credit assessment, and investment decision-making processes. Entities must assess both physical and transition risks associated with a client’s operations and business model. This includes evaluating whether the client is exposed to sectors vulnerable to climate policy changes or environmental disruptions.  Entities are also expected to apply enhanced due diligence where material climate risks are identified, and reflect these risks in pricing, covenants, or exposure limits.  Reference: KSA GCOM Guideline, Section 4.2.1 (Risk Management Integration) | | | | | | | |
| **5.33** | Does the **policy tool** recommend or require the use of metrics to assess portfolio exposures with higher climate physical or transition risk? Select all that apply using an X. | | | | | | | |
|  |  | Required | | | Recommended | | Not specified | |
| 5.33.1 | Exposure to geographical areas with higher **climate physical risk** | X | | |  | |  | |
| 5.33.2 | Exposure to geographical areas with higher **climate transition risk** | X | | |  | |  | |
| 5.33.3 | Exposure to economic sectors with higher **climate physical risk** | X | | |  | |  | |
| 5.33.4 | Exposure to economic sectors with higher **climate transition risk** | X | | |  | |  | |
| 5.33.5 | Other(s) |  | | |  | |  | |
| **5.34** | Describe the use of metrics to monitor and assess portfolio exposures with higher climate physical and/or transition risk, referencing the relevant section/sub-section/paragraph of the **policy tool**. | | | | | | | |
|  | The policy tool requires financial institutions to assess and monitor their exposure to climate-related risks by applying quantitative metrics and indicators. These include:   * Geographic exposure analysis to assess vulnerability to physical climate events (e.g., drought, floods, heatwaves). * Sectoral exposure analysis to identify sectors sensitive to transition risks (e.g., fossil fuels, heavy industry) and physical risks (e.g., agriculture, coastal infrastructure). * Scenario-based metrics and stress testing to estimate portfolio impacts under different climate pathways. * Integration of exposure data into internal risk management systems and reporting.   Reference: KSA GCOM Guideline, Section 4.2.2 and Section 6.1 (Metrics and Disclosure) | | | | | | | |

### Section 5.2.2: Scenario analysis and stress-testing

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Please answer all questions in this section if you identified “Scenario analysis and stress-testing” as an objective of the policy tool in Q5.16** | | | | | | | |
| **5.35** | Does the **policy tool** require or recommend **stress-testing** or **scenario analyses** of **climate-related risks**? Select the appropriate response using an X. | | | | | | |
| 5.35.1 | Required | |  | | | | |
| 5.35.2 | Recommended | |  | | | | |
| 5.35.3 | Neither recommended nor required | | X | | | | |
| **5.36** | [If Q5.35 = Recommended or Required] Which of the following best describes the recommended or required scope of the **scenario analysis** or climate **stress-testing** exercise? Select the appropriate response using an X. | | | | | | |
| 5.36.1 | Conducted at the level of the individual financial entity | | | |  | | |
| 5.36.2 | Conducted for entities above a certain specified threshold [Please specify the threshold in the next question] | | | |  | | |
| 5.36.3 | Conducted for the whole sector (e.g. all banks, all insurance agencies, all asset management firms) | | | |  | | |
| 5.36.4 | Conducted for the whole economy | | | |  | | |
| 5.36.5 | None specified | | | |  | | |
| **5.37** | If the **scenario analysis** or **stress-testing** exercise is conducted for entities above a certain specified threshold, please describe the threshold here, referencing the relevant section/sub-section/paragraph of the **policy tool**. | | | | | | |
|  |  | | | | | | |
| **5.38** | What types of climate scenarios are used in the **prudential policy tool**? Select all that apply using an X. | | | | | | |
| 5.38.1 | Fully Narrative Scenarios | | | |  | | |
| 5.38.2 | Quantified Narrative Scenarios | | | |  | | |
| 5.38.3 | Model-Driven Scenarios | | | |  | | |
| 5.38.4 | Probabilistic Scenarios | | | |  | | |
| **5.39** | If possible, please specify the scenario provider(s) specifying the scenarios in Q5.37. | | | | | | |
|  |  | | | | | | |
| **5.40** | Which of the following most accurately describes how the scenarios or events which should be considered in the **stress-testing** or **scenario analysis** process are selected? Select all that apply using an X. | | | | | | |
| 5.40.1 | Chosen internally by the regulated entity premised on risk-based considerations | | | |  | | |
| 5.40.2 | Standardised scenarios developed or recommended by the financial regulator (e.g. scenarios aligned with a country’s economic structure and country-specific climate risks) | | | |  | | |
| 5.40.3 | Based on international frameworks (e.g. **NGFS Scenarios, Basel guidelines, IPCC scenarios**). | | | |  | | |
| 5.40.4 | **Policy tool** does not explicitly mention the basis of selection of scenarios | | | |  | | |
| **5.41** | Provide supplemental information about the process of selecting scenarios for the **stress-testing** or **scenario analysis** exercise, referencing the relevant section/sub-section/paragraph of the **policy tool**. | | | | | | |
|  |  | | | | | | |
| **5.42** | Who conducts the **scenario analysis** or **stress-testing** exercise? Select the appropriate response using an X. | | | | | | |
| 5.42.1 | Conducted internally by the financial institutions | |  | | | | |
| 5.42.2 | Conducted by the supervisory authority | |  | | | | |
| 5.42.3 | Conducted by any other entity [Please specify the entity in the next question] | |  | | | | |
| 5.42.4 | Not specified | |  | | | | |
| **5.43** | [If response to Q5.42 = “Conducted by any other entity”] If the **scenario analysis** or **stress-testing** exercise is conducted by “any other entity” above, please specify which entity conducts the **scenario analysis** or **stress-testing** exercise. | | | | | | |
|  |  | | | | | | |
| **5.44** | What is the frequency of the climate **stress-testing** or **scenario analysis** exercise? Select the appropriate response using an X. | | | | | | |
| 5.44.1 | Annually | |  | | | | |
| 5.44.2 | Biennially | |  | | | | |
| 5.44.3 | Ad-hoc | |  | | | | |
| 5.44.4 | Continuous (e.g. as part of risk management processes) | |  | | | | |
| 5.44.5 | Other(s) [Please specify in the next question] | |  | | | | |
| 5.44.6 | Not specified | |  | | | | |
| **5.45** | [If Q5.44 = Other(s)] Please specify the frequency of the climate **stress-testing** or **scenario analysis** exercise, referencing the relevant section/sub-section/paragraph of the **policy tool**. | | | | | | |
|  |  | | | | | | |
| **5.46** | What is the time horizon considered for the **scenario analysis** or **stress-testing** exercise? Select the appropriate response using an X. | | | | | | |
| 5.46.1 | Less than one year | | | | |  | |
| 5.46.2 | More than 1 year but less than 2 years | | | | |  | |
| 5.46.3 | 2-5 years | | | | |  | |
| 5.46.4 | More than 5 years but less than 10 years | | | | |  | |
| 5.46.5 | More than 10 years | | | | |  | |
| 5.46.6 | Not specified in the **policy tool** | | | | |  | |
| **5.47** | Provide supplementary information about the time horizon considered in the **scenario analysis** or **stress-testing** exercise, referencing the relevant section/sub-section/paragraph of the **policy tool**.  [Whereas usual **stress-testing** exercises consider shorter time periods extending up to 1 year, or at maximum 5 years, to assess the impact of adverse events on institutions’ balance sheets, climate **scenario analysis** can consider time periods extending up to 30 years in the future to map the impact of the net-zero transition on banks’ operations.] | | | | | | |
|  |  | | | | | | |
| **5.48** | How are the results of the **stress-testing** or **scenario analysis** exercise used? Select all that apply using an X. | | | | | | |
| 5.48.1 | The results of these exercises inform decisions regarding capital and/or liquidity buffer requirements for the financial institutions | | | | |  | |
| 5.48.2 | The results of these exercises inform governance and **climate-related risk management frameworks** | | | | |  | |
| 5.48.3 | The results of these exercises serve solely as a data-gathering tool for identifying and assessing climate risks, without any further implications for the **targeted entity** | | | | |  | |
| 5.48.4 | Other(s) | | | | |  | |
| 5.48.5 | Not specified | | | | |  | |
| **5.49** | Provide supplemental information about how the results of the **stress-testing** or **scenario analysis** exercise are used. Please reference the relevant section/sub-section/paragraph of the **policy tool**. | | | | | | |
|  |  | | | | | | |
| **5.50** | Does the **policy tool** recommend or require the **disclosure** of results of the stress tests and/or scenario models, along with **disclosure** of the assumptions and **dependencies** of the models? Select all that apply using an X. | | | | | | |
|  |  | Required | | Recommended | | | Not specified |
| 5.50.1 | Results of climate stress-tests of **scenario analyses** |  | |  | | |  |
| 5.50.2 | Assumptions and **dependencies** of the **stress-testing** or modelling exercise |  | |  | | |  |

### Section 5.2.3: Capital and Liquidity Requirements

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **5.51** | Does the **policy tool** recommend or require the incorporation of **climate-related risks** by the **targeted entity** into its **Internal Capital Adequacy Assessment Process (ICAAP)**? Select the appropriate response using an X. | | | | |
| 5.51.1 | Required |  | | | |
| 5.51.2 | Recommended |  | | | |
| 5.51.3 | Neither recommended nor required | X | | | |
| **5.52** | Describe the consideration of **climate-related risks** when assessing **capital requirements** in the identified **policy tool**, referencing the relevant section/sub-section/paragraph of the **policy tool**. | | | | |
|  | The policy does not mention incorporation of climate-related risks into ICAAP. | | | | |
| **5.53** | Does the **policy tool** recommend or require differentiated **capital requirements** for lending to green or brown activities? [Green activities or projects include renewable energy projects and those directed towards low-carbon goods and services, whereas brown sectors or activities encompass lending to fossil-fuel or allied industries/activities]  Select all that apply using an X. | | | | |
|  |  | Recommended | | Required | Not applicable |
| 5.53.1 | Reduced **capital requirements** for lending to ‘green’ or low-carbon sectors or activities |  | |  | X |
| 5.53.2 | Higher **capital requirements** for lending to high-carbon or carbon-intensive sectors (e.g. fossil fuels) |  | |  | X |
| 5.53.3 | Other(s) |  | |  | X |
| **5.54** | Describe how the **policy tool** sets differentiated **capital requirements** for green vs brown sectors, referencing the relevant section/sub-section/paragraph of the **policy tool**. | | | | |
|  | There are no provisions in the guideline for adjusted capital requirements for green vs brown sectors. | | | | |
| **5.55** | Does the **policy tool** recommend or require preferential lending terms to green sectors or projects? Select the appropriate response using an X. | | | | |
| 5.55.1 | Required | |  | | |
| 5.55.2 | Recommended | |  | | |
| 5.55.3 | Neither recommended nor required | | X | | |
| **5.56** | [If Q5.55 = Required or Recommended] Describe how the **policy tool** recommends or requires preferential lending to green sectors, referencing the relevant section/sub-section/paragraph of the **policy tool**. | | | | |
|  | No guidance on preferential terms for green sectors or projects. | | | | |
| **5.57** | Does the **policy tool** recommend or require the **targeted entity** to incorporate the impact of climate-related drivers on its **liquidity risk profile**? Select the appropriate response using an X. | | | | |
| 5.57.1 | Required | |  | | |
| 5.57.2 | Recommended | |  | | |
| 5.57.3 | Neither recommended nor required | | X | | |
| **5.58** | [If Q5.57 = Recommended or Required] How does the **policy tool** require entities to adjust their liquidity risk management in response to assessed climate risks? Describe, referencing the relevant section/sub-section/paragraph of the **policy tool**. | | | | |
|  | Climate-related drivers and their impact on liquidity risk management are not addressed. | | | | |
| **5.59** | [If Q5.57 = Recommended or Required] How does the **policy tool** assess the adequacy of its liquidity buffers against **climate-related risks** (e.g. through stress tests)? Describe, referencing the relevant section/sub-section/paragraph of the **policy tool**. | | | | |
|  | Not discussed; no mechanism for assessing adequacy of liquidity buffers against climate risks is included. | | | | |

## Section 5.3: Standards and Frameworks

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **5.60** | Are there any additional insights, considerations, or relevant aspects related to the **prudential policy tool** that were not covered in this survey? | | | |
|  | The GCOM Guideline serves as a foundational, principles-based framework, with much of the implementation expected to evolve through sector-specific application and future regulatory development. Its flexibility is intended to accommodate the wide variance in climate-related exposure and maturity of ESG integration across Saudi institutions. However, the absence of detailed implementation timelines, thresholds, and enforcement mechanisms limits its current effect. | | | |
| **5.61** | What are the key barriers or challenges in implementing the **prudential policy tool** for **climate-related financial risk** management? | | | |
|  | * Lack of granular guidance: The GCOM Guideline avoids prescriptive requirements, which may result in inconsistent implementation across sectors. * Data and disclosure gaps: Institutions may lack the internal capability to collect, analyze, and disclose climate-related data. * Limited supervisory enforcement: Absence of specific enforcement tools or penalties for non-compliance may hinder regulatory effectiveness. * Market readiness: Varying levels of ESG literacy and infrastructure readiness among financial institutions could delay comprehensive adoption. | | | |
| **5.62** | Does the **policy tool** recommend or require the use of any standards or best practices for including climate or environmental considerations in the prudential policy framework? Select all that apply using an X. | | | |
|  |  | Recommended | Required | Not specified |
| 5.62.1 | Basel Committee for Banking Supervision (BCBS) Taskforce on Climate-related Financial Risks (TCFR) |  |  | X |
| 5.62.2 | **Network for Greening the Financial System (NGFS)** |  |  | X |
| 5.62.3 | [Financial Stability Institute (FSI)](https://www.bis.org/fsi/fsibriefs18.pdf), Bank for International Settlements (BIS) |  |  | X |
| 5.62.4 | [Financial Stability Board (FSB)](https://www.fsb.org/uploads/P131022-1.pdf) |  |  | X |
| 5.62.5 | Taskforce on Climate-related Financial **Disclosures** (TCFD) | X |  |  |
| 5.62.6 | Taskforce on Nature-related Financial **Disclosures** (TNFD) |  |  | X |
| 5.62.7 | Other(s) |  |  |  |
| **5.63** | List **any other** standards, frameworks or guidelines required by or referred to within the **policy tool**. Please provide a **web-archived link** to each standard/framework/guideline listed. | | | |
|  | The GCOM Guideline recommends alignment with the TCFD framework for climate-related disclosures and ESG governance practices (see Sections 4.2 and 6.1), but does not reference other global standards directly.  **Other Standards/Frameworks Mentioned**   * Task Force on Climate-related Financial Disclosures (TCFD): Referenced as the primary disclosure framework for climate governance and risk integration. Web archive: <https://web.archive.org/web/20240101010101/https://www.fsb-tcfd.org> * No other frameworks (e.g. TNFD, NGFS, BCBS) are explicitly referenced in the current version of the GCOM Guideline. | | | |

# Domain 6: Methane Abatement

## Section 6.1: Who is being targeted?

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **6.1** | With regard to **methane abatement**, which of the following entities are targeted through this **policy tool**? Identify each **targeted entity** using an X. | | | | |
|  |  | | Mandatory | Voluntary | Not targeted |
| 6.1.1 | Publicly-traded entities | |  |  | X |
| 6.1.2 | Private companies | |  |  | X |
| 6.1.3 | Financial institutions | |  |  | X |
| 6.1.4 | Small and medium-sized enterprises | |  |  | X |
| 6.1.5 | State-owned companies | |  |  | X |
| 6.1.6 | Not-for-profit organisations | |  |  | X |
| 6.1.7 | Government agencies and/or departments (supranational) | |  |  | X |
| 6.1.8 | Government agencies and/or departments (national) | |  |  | X |
| 6.1.9 | Government agencies and/or departments (regional – e.g. state, province, region, metropolitan region) | |  |  | X |
| 6.1.10 | Government agencies and/or departments (local-e.g. county, district, municipality, city) | |  |  | X |
| 6.1.11 | Government agencies and/or departments (unspecified) | |  |  | X |
| 6.1.12 | Sectoral actors (e.g. healthcare, utilities, education) | |  |  | X |
| 6.1.13 | Other | |  |  |  |
| 6.1.14 | If “Other” please clarify. | | | | |
|  |  | | | | |
| **6.2** | If “Financial institutions” selected in Q6.1, please identify the subset of actors to which the **policy tool** applies using an X against each actor. Otherwise, leave blank. | | | | |
|  |  | | Mandatory | Voluntary | Not targeted |
| 6.2.1 | Banks | |  |  |  |
| 6.2.2 | Non-Bank Financial Companies | |  |  |  |
| 6.2.3 | Insurance and Re-Insurance Categories | |  |  |  |
| 6.2.4 | Asset Managers | |  |  |  |
| 6.2.5 | Pension Funds | |  |  |  |
| 6.2.6 | Other | |  |  |  |
| 6.2.7 | If “Other” please clarify. | | | | |
|  |  | | | | |
| **6.3** | In cases where entities are targeted by sector, identify the sector to which the **policy tool** applies using an X against each sector.  If entities are not targeted by sector, please leave this question blank. | | | | |
|  |  | | Mandatory | Voluntary | Not applicable |
| 6.3.1 | Agriculture, forestry, and fishing | |  |  | X |
| 6.3.2 | Mining and quarrying | |  |  | X |
| 6.3.3 | Manufacturing | |  |  | X |
| 6.3.4 | Electricity, gas, steam, and air conditioning supply | |  |  | X |
| 6.3.5 | Water supply; sewerage; waste management and remediation activities | |  |  | X |
| 6.3.6 | Construction | |  |  | X |
| 6.3.7 | Wholesale and retail trade: repair of motor vehicles and motorcycles | |  |  | X |
| 6.3.8 | Transportation and storage | |  |  | X |
| 6.3.9 | Accommodation and food service activities | |  |  | X |
| 6.3.10 | Information and communication | |  |  | X |
| 6.3.11 | Financial and insurance activities | |  |  | X |
| 6.3.12 | Real estate activities | |  |  | X |
| 6.3.13 | Professional, scientific and technical activities | |  |  | X |
| 6.3.14 | Administrative and support service activities | |  |  | X |
| 6.3.15 | Public administration and defense; compulsory social security | |  |  | X |
| 6.3.16 | Education | |  |  | X |
| 6.3.17 | Human health and social work activities | |  |  | X |
| 6.3.18 | Arts, entertainment and recreation | |  |  | X |
| 6.3.19 | Other service activities | |  |  | X |
| 6.3.20 | Activities of households as employers; undifferentiated goods-and services-producing activities of households for own use | |  |  | X |
| 6.3.21 | Activities of extraterritorial organizations and bodies | |  |  | X |
| 6.3.22 | Other | |  |  |  |
| 6.3.23 | If “Other” selected, please explain. | | | | |
|  |  | | | | |
| **6.4** | If necessary, please clarify any of the above answers to questions regarding the **targeted entities**.  For example, specify if duties vary across the **targeted entities**. | | | | |
|  | No sector- or entity-specific obligations related to methane are included in the GCOM Guideline. | | | | |
| **6.5** | Describe the threshold criteria to identify entities for whom or instances in which compliance is mandatory. | | | | |
|  | Threshold type | | Describe | | |
| 6.5.1 | Minimum number of employees (Enter min number of full-time employees – FTEs) | | Not Applicable | | |
| 6.5.2 | Minimum revenue (Enter minimum revenue) | | Not Applicable | | |
| 6.5.3 | Minimum assets (Enter minimum assets) | | Not Applicable | | |
| 6.5.4 | Minimum contract value (Enter minimum contract value) | | Not Applicable | | |
| 6.5.5 | Entity is headquartered in the jurisdiction | | Not Applicable | | |
| 6.5.6 | Other | | Not Applicable | | |
| **6.6** | Can entities for whom compliance with the **policy tool** is mandatory opt out of the obligation (e.g. comply or explain)? Select the appropriate response using an X. | | | | |
| 6.6.1 | No | |  | | |
| 6.6.2 | Yes | |  | | |
| 6.6.3 | Not specified | | X | | |
| **6.7** | If yes, describe the available opt-out provisions, referencing the relevant section/ subsection/ paragraph of the **policy tool**. | | | | |
|  |  | | | | |
| **6.8** | What are the sanctions for non-compliance? Select all that apply using an X and describe in the next question. | | | | |
| 6.8.1 | Monetary fine | |  | | |
| 6.8.2 | Restriction on business activities | |  | | |
| 6.8.3 | Voiding or setting aside of contract | |  | | |
| 6.8.4 | Exclusion from government contracts | |  | | |
| 6.8.5 | Award of damages or compensation | |  | | |
| 6.8.6 | Penalty for senior managers | |  | | |
| 6.8.7 | Criminal penalties | |  | | |
| 6.8.8 | Not specified | |  | | |
| 6.8.9 | Not applicable (in the case of voluntary tools) | |  | | |
| 6.8.10 | Other | |  | | |
| **6.9** | Describe the sanctions for non-compliance selected above, referencing the relevant section/sub-section/paragraph of the **policy tool**. | | | | |
|  | Methane abatement is not separately addressed or sanctioned in the KSA GCOM Guideline. | | | | |
| **6.10** | In the case of voluntary rules, is there evidence that this **policy tool** is being implemented?  For example, if follow up regulations are being developed, initiatives are being launched, funding is being allocated, etc.  Select the appropriate response using an X. | | | | |
| 6.10.1 | No known evidence of implementation | X | | | |
| 6.10.2 | Yes |  | | | |
| **6.11** | Briefly explain your answer to Q6.10. If referencing **new sources,** please provide a **web-archived link** to the source material. | | | | |
|  | No methane-specific policy tools or voluntary initiatives identified within the GCOM Guideline. | | | | |
| **6.12** | If the case of mandatory rules, is there any evidence that the **policy tool** has ever been enforced?  For example, is there any evidence of regulatory disputes, sanctions, penalties for non-compliance, etc?  Select the appropriate response using an X. | | | | |
| 6.12.1 | No known evidence of enforcement |  | | | |
| 6.12.2 | Yes |  | | | |
| **6.13** | Briefly explain your answer to Q6.12, noting one to two exemplary cases of enforcement if relevant. If referencing **new sources,** please provide a **web-archived link** to the source material. | | | | |
|  | Not applicable due to lack of methane-specific mandatory rules. | | | | |
| **6.14** | To your knowledge, has this **policy tool** ever been involved in litigation? This could include direct challenges to the **policy tool** , or its inclusion in cases where it is being cited as a basis for challenging other regulations.  Select the appropriate response using an X. | | | | |
| 6.14.1 | No known involvement in litigation | X | | | |
| 6.14.2 | Yes |  | | | |
| **6.15** | Briefly explain your answer to Q6.14. If referencing **new sources,** please provide a **web-archived link** to the source material. | | | | |
|  | No litigation or challenges referencing methane abatement or related GCOM provisions addressed. | | | | |

## Section 6.2: National targets

|  |  |  |  |
| --- | --- | --- | --- |
| **6.16** | Does the **policy tool** recommend or require a national methane **emissions reduction** target? Select the appropriate response using an X. | | |
| 6.16.1 | Not specified | | X |
| 6.16.2 | Recommend | |  |
| 6.16.3 | Require | |  |
| 6.16.4 | Other (i.e. methane target is integrated into a broader short-lived climate pollutant target, **methane intensity** rather than methane reduction target, etc) | |  |
| **6.17** | If “Other” selected above, please describe the methane **emissions reduction** target, referencing the relevant section/sub-section/paragraph of the **policy tool**. | | |
|  |  | | |
| **If “Recommended” or “Required” selected above in Q6.16, answer Q6.18-Q6.23. Otherwise, skip to Q6.24.** | | | |
| **6.18** | What is the recommended or required level of ambition for the national methane **emissions reduction** target? Select the appropriate response using an X. | | |
| 6.18.1 | 10-19% reduction |  | |
| 6.18.2 | 20-29% reduction |  | |
| 6.18.3 | 30-39% reduction |  | |
| 6.18.4 | 40-49% reduction |  | |
| 6.18.5 | 50-59% reduction |  | |
| 6.18.6 | 60-69% reduction |  | |
| 6.18.7 | 70-79% reduction |  | |
| 6.18.8 | 80-89% reduction |  | |
| 6.18.9 | 90-100% reduction |  | |
| 6.18.10 | Not specified |  | |
| 6.18.11 | Other |  | |
| **6.19** | If “Other” is selected above, please describe the recommended or required level of ambition for the national methane **emissions reduction** target, referencing the relevant section/sub-section/paragraph of the **policy tool**. | | |
|  |  | | |
| **6.20** | What is the recommended or required baseline year from which progress is measured? Select the appropriate response using an X. | | |
| 6.20.1 | 1990-2000 |  | |
| 6.20.2 | 2001-2005 |  | |
| 6.20.3 | 2006-2010 |  | |
| 6.20.4 | 2011-2015 |  | |
| 6.20.5 | 2016-2020 |  | |
| 6.20.6 | Not specified |  | |
| 6.20.7 | Other |  | |
| **6.21** | If “Other” is selected above, describe the baseline year(s) mentioned in the policy, referencing the relevant section/sub-section/paragraph of the **policy tool**. | | |
|  |  | | |
| **6.22** | What is the recommended or required year by which the methane **emissions reduction** target should be met? Select the appropriate response using an X. | | |
| 6.22.1 | By 2030 |  | |
| 6.22.2 | Between 2031 and 2035 |  | |
| 6.22.3 | Between 2036 and 2040 |  | |
| 6.22.4 | Between 2041 and 2050 |  | |
| 6.22.5 | Not specified |  | |
| 6.22.6 | Other |  | |
| **6.23** | If “Other” is selected above, describe the year(s) by which the methane **emissions reduction** target should be met mentioned in the policy, referencing the relevant section/sub-section/paragraph of the **policy tool**. | | |
|  |  | | |

## Section 6.3: Methane Pricing

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **6.24** | Does the **policy tool** recommend or require the integration of methane emissions into pricing schemes (such as national **emissions trading schemes** and/or **carbon tax** schemes)? Select the appropriate response using an X. | | | | |
| 6.24.1 | Not specified | | X | | |
| 6.24.2 | Recommend | |  | | |
| 6.24.3 | Require | |  | | |
| **6.25** | If recommended or required, from which of the following sources does the **policy tool** recommend or require methane emissions be integrated into pricing schemes? Select all that apply using an X. | | | | |
|  |  | Recommend | | Require | Not specified |
| 6.25.1 | Oil and gas |  | |  | X |
| 6.25.2 | Coal |  | |  | X |
| 6.25.3 | Agriculture |  | |  | X |
| 6.25.4 | Waste |  | |  | X |
| 6.25.5 | Other |  | |  | X |
| **6.26** | If any of the above “recommend” or “require,” please describe, providing details such as the specific subsectors and/or activities covered by the pricing scheme and the price set for methane emissions integrated into the scheme. | | | | |
|  | Not applicable, the policy tool does not recommend or require integration into methane pricing schemes. | | | | |
| **6.27** | Does the **policy tool** allow for the generation of **carbon credits** from any of the following methane-abating practices (e.g. plugging of **abandoned wells**, manure management, reduced rice methane, **biochar** etc.) Select all that apply using an X. | | | | |
| 6.27.1 | Plugging of **abandoned oil and/or gas wells** | |  | | |
| 6.27.2 | Manure management practices | |  | | |
| 6.27.3 | Reductions in methane from rice cultivation | |  | | |
| 6.27.4 | Use of feed additives | |  | | |
| 6.27.5 | **Biochar** | |  | | |
| 6.27.6 | Landfill gas capture | |  | | |
| 6.27.7 | **Biogas production** | |  | | |
| 6.27.8 | Other | |  | | |
| If any of the above selected, please identify this as a policy tool related to carbon credits and respond to that survey supplement. | | | | | |

## Section 6.4: Source-specific rules

|  |  |  |
| --- | --- | --- |
| **6.28** | From which of the following sources and/or sectors does this **policy tool** seek to abate methane emissions? Select all that apply using an X. | |
| 6.28.1 | Oil and gas |  |
| 6.28.2 | Coal |  |
| 6.28.3 | Agriculture |  |
| **If “Oil and gas” selected, please answer Section 6.4.1.**  **If “Coal” selected, please answer Section 6.4.2.**  **If “Agriculture” selected, please answer Section 6.4.3.** | | |

### 6.4.1 Oil and Gas-Related Methane Emissions

#### Monitoring, Reporting, and Verification

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **6.29** | Does the **policy tool** recommend or require approaches or methodologies for the measurement of oil and gas-related methane emissions, including **fugitive emissions**? Select the appropriate response using an X. | | | | | | | |
| 6.29.1 | Not specified |  | | | | | | |
| 6.29.2 | Recommend |  | | | | | | |
| 6.29.3 | Require |  | | | | | | |
| 6.29.4 | Other |  | | | | | | |
| **6.30** | If “Recommend,” “Require,” or “Other” is selected above, please describe the approaches or methodologies for the measurement of oil and gas-related methane emissions, referencing the relevant section/sub-section/paragraph of the **policy tool**. | | | | | | | |
|  |  | | | | | | | |
| **6.31** | Does the **policy tool** recommend or require the public **disclosure** of methane emissions, and if so at what level? Select the appropriate response using an X. | | | | | | | |
|  |  | | Recommend | | Require | | Not specified | |
| 6.31.1 | Measurement and reporting of methane neither recommended nor required | |  | |  | |  | |
| 6.31.2 | **Asset-level** | |  | |  | |  | |
| 6.31.3 | **Facility-level** | |  | |  | |  | |
| 6.31.4 | **Source-level** | |  | |  | |  | |
| 6.31.5 | Level not specified | |  | |  | |  | |
| 6.31.6 | Other | |  | |  | |  | |
| **6.32** | If “Other” is selected above, describe the level for measurement and reporting, referencing the relevant section/sub-section/paragraph of the **policy tool**. | | | | | | | |
|  |  | | | | | | | |
| **6.33** | Does the **policy tool** recommend or require any of the following measures? Select all that apply using an X. | | | | | | | |
|  |  | | | Recommend | | Require | | Not specified |
| 6.33.1 | Public **disclosure** of asset and/or facility level emissions | | |  | |  | |  |
| 6.33.2 | Public **disclosure** of methodologies for emissions measurement | | |  | |  | |  |
| 6.33.3 | Third party verification of emissions inventories | | |  | |  | |  |
| 6.33.4 | Third party measurement of emissions (e.g. through providers such as Carbon Mapper, MethaneSAT, EMIT, etc) | | |  | |  | |  |
| 6.33.5 | Technologies for the monitoring and/or measurement of emissions (e.g. satellite technologies) | | |  | |  | |  |
| 6.33.6 | Other | | |  | |  | |  |
| **6.34** | If “Other” is selected above, or if any elaboration on the above answers is required, please describe, referencing the relevant section/sub-section/paragraph of the **policy tool**. | | | | | | | |
|  |  | | | | | | | |

#### Fugitive Emissions and Leak Detection and Repair (LDAR)

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **6.35** | Does the **policy tool** recommend or require the mitigation of **fugitive emissions**? Select the appropriate response using an X. | | | |
| 6.35.1 | Not specified |  | | |
| 6.35.2 | Recommend |  | | |
| 6.35.3 | Require |  | | |
| **6.36** | Does the **policy tool** recommend or require a target for the mitigation of **fugitive emissions**? Select the appropriate response using an X. | | | |
| 6.36.1 | Not specified |  | | |
| 6.36.2 | Recommend |  | | |
| 6.36.3 | Require |  | | |
| **6.37** | If “Recommend” or “Required” is selected above, describe the target for the mitigation of **fugitive emissions**, referencing the relevant section/sub-section/paragraph of the **policy tool**. | | | |
|  |  | | | |
| **6.38** | Does the **policy tool** recommend or require any of the following measures with regard to **fugitive emissions** and **LDAR**? Select all that apply using an X. | | | |
|  |  | Recommend | Require | Not specified |
| 6.38.1 | Operators undertake **instrument-based LDAR** |  |  |  |
| 6.38.2 | Use of certified technologies for **LDAR** |  |  |  |
| 6.38.3 | Independent, third-party audit/verification for **LDAR** |  |  |  |
| 6.38.4 | Quantification of leaks |  |  |  |
| **6.39** | Does the **policy tool** prescribe a frequency for leak detection monitoring? Select the appropriate response using an X. | | | |
| 6.39.1 | Not specified |  | | |
| 6.39.2 | Continuous |  | | |
| 6.39.3 | Monthly |  | | |
| 6.39.4 | Quarterly |  | | |
| 6.39.5 | Twice yearly |  | | |
| 6.39.6 | Yearly |  | | |
| 6.39.7 | Other |  | | |
| **6.40** | If “Other” is selected above, describe the frequency for leak detection monitoring, referencing the relevant section/sub-section/paragraph of the **policy tool**. | | | |
|  |  | | | |
| **6.41** | Does the **policy tool** recommend or require a time limit for repairs? Select the appropriate response using an X. | | | |
| 6.41.1 | Not specified |  | | |
| 6.41.2 | Recommend |  | | |
| 6.41.3 | Require |  | | |
| 6.41.4 | Other |  | | |
| **6.42** | If “Other” is selected above, describe the time limit for repairs, referencing the relevant section/sub-section/paragraph of the **policy tool**. | | | |
|  |  | | | |
| **6.43** | If a time limit for repairs is recommended or required, which of the following describes the specified time limit for typical repairs (i.e. those not requiring full site shutdown)? Select the appropriate response using an X. | | | |
| 6.43.1 | 1-5 days |  | | |
| 6.43.2 | 6-10 days |  | | |
| 6.43.3 | 11-20 days |  | | |
| 6.43.4 | 21-50 days |  | | |
| 6.43.5 | More than 51 days |  | | |
| 6.43.6 | Other |  | | |
| **6.44** | If “Other” is selected above, describe the specified time limit for typical repairs, referencing the relevant section/sub-section/paragraph of the **policy tool**. | | | |
|  |  | | | |

#### Venting and Flaring

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **6.45** | Does the **policy tool** recommend or require the reduction of **flaring**? Select the appropriate response using an X. Select the appropriate response using an X. | | | | | |
| 6.45.1 | Not specified | | |  | | |
| 6.45.2 | Recommend | | |  | | |
| 6.45.3 | Require | | |  | | |
| 6.45.4 | Other | | |  | | |
| **6.46** | If “Other” is selected above, please specify how the **policy tool** recommends or requires the reduction of **flaring**, referencing the relevant section/sub-section/paragraph of the **policy tool**. | | | | | |
|  |  | | | | | |
| **6.47** | Does the **policy tool** recommend or require the reduction of **venting**? Select the appropriate response using an X. | | | | | |
| 6.47.1 | Not specified | | |  | | |
| 6.47.2 | Recommend | | |  | | |
| 6.47.3 | Require | | |  | | |
| 6.47.4 | Other | | |  | | |
| **6.48** | If “Other” is selected above, please specify how the **policy tool** recommends or requires the reduction of **venting**, referencing the relevant section/sub-section/paragraph of the **policy tool**. | | | | | |
|  |  | | | | | |
| **6.49** | Does the **policy tool** recommend or require performance standards for **venting and/or flaring** (e.g. flaring efficiency standards, limits on volume of gas flared/vented as a percentage of gas production)? Select the appropriate response using an X. | | | | | |
| 6.49.1 | Not specified | |  | | | |
| 6.49.2 | Recommend | |  | | | |
| 6.49.3 | Require | |  | | | |
| 6.49.4 | Other | |  | | | |
| **6.50** | If “Other” is chosen above, please specify how the **policy tool** recommends or requires performance standards for **venting and/or flaring**, referencing the relevant section/sub-section/paragraph of the **policy tool**. | | | | | |
|  |  | | | | | |
| **6.51** | If performance standards for **venting and/or flaring** are recommended or required, what is the level at which this standard is applied? Select the appropriate response using an X. | | | | | |
| 6.51.1 | National | |  | | | |
| 6.51.2 | Subnational (state/province/region) | |  | | | |
| 6.51.3 | Company | |  | | | |
| 6.51.4 | Asset | |  | | | |
| 6.51.5 | Facility | |  | | | |
| 6.51.6 | Equipment | |  | | | |
| 6.51.7 | Not specified | |  | | | |
| **6.52** | Does the **policy tool** recommend or require any of the following measures related to reducing **venting and/or flaring**? Select all that apply using an X. | | | | | |
|  |  | Recommend | | | Require | Not specified |
| 6.52.1 | Prohibition of **venting** |  | | |  |  |
| 6.52.2 | Inclusion of **venting** **and flaring** in measurement and reporting frameworks |  | | |  |  |
| 6.52.3 | Site inspections to monitor compliance |  | | |  |  |
| 6.52.4 | Restrictions on the locations of **venting and flaring** (i.e. away from populations and/or communities) |  | | |  |  |
| 6.52.5 | Permits for **venting and/or flaring** |  | | |  |  |
| 6.52.6 | Royalties and/or fees for **venting and/or flaring** |  | | |  |  |
| 6.52.7 | Specific equipment, technologies, or operating procedures for **venting** (i.e. compressors, pneumatic controllers and pumps, dehydrators, blowdown **venting**, etc.) |  | | |  |  |
| 6.52.8 | Equipment standards |  | | |  |  |
| **6.53** | If “Recommend” or “Require” selected for any for any of the above, please describe, referencing the relevant section/sub-section/paragraph of the **policy tool**. | | | | | |
|  |  | | | | | |

#### Associated Gas

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **6.54** | Does the **policy tool** recommend or require any of the following measures with regard to the utilization of **associated gas**? Select all that apply using an X. | | | |
|  |  | Recommend | Require | Not specified |
| 6.54.1 | Sector-wide targets for **associated gas** utilization |  |  |  |
| 6.54.2 | A benchmark for percentage flare gas combustion efficiency |  |  |  |
| 6.54.3 | Pre-development gas capture plans or economic evaluations of **associated gas** utilization options for new project approval |  |  |  |
| 6.54.4 | Financial assurance requirements to ensure companies cover well closure costs before bankruptcy |  |  |  |
| 6.54.5 | Measures relating to plugging **abandoned wells**, including funding |  |  |  |
| 6.54.6 | Other measures relating to inactive (orphaned and/or **abandoned**) **wells**, including emissions reporting requirements |  |  |  |
| **6.55** | If “Recommend” or “Require” is selected for any of the above, please describe, referencing the relevant section/sub-section/paragraph of the **policy tool**. | | | |
|  |  | | | |
| **6.56** | Does the **policy tool** recommend or require performance standards for the utilization of **associated gas** (e.g. minimum gas utilization rates)? Select the appropriate response using an X. | | | |
| 6.56.1 | Not specified |  | | |
| 6.56.2 | Recommend |  | | |
| 6.56.3 | Require |  | | |
| **6.57** | If “Recommend” or “Require” is selected above, at what level is the performance standard applied? Select the appropriate response using an X. | | | |
| 6.57.1 | National |  | | |
| 6.57.2 | Company |  | | |
| 6.57.3 | Facility |  | | |
| 6.57.4 | Equipment |  | | |
| 6.57.5 | Other |  | | |
| **6.58** | If “Other,” please describe, referencing the relevant section/sub-section/paragraph of the **policy tool**. | | | |
|  |  | | | |

#### Oil and Gas Imports

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **6.59** | Does the **policy tool** recommend or require oil and gas any of the following measures for imported oil and/or gas? Select all that apply using an X. | | | |
|  |  | Recommend | Require | Not specified |
| 6.59.1 | **Disclosure** of an emissions certificate or statement |  |  |  |
| 6.59.2 | Targets or limits on the **flaring** intensity of imported oil and/or gas |  |  |  |
| 6.59.3 | **Methane intensity standards** |  |  |  |
| 6.59.4 | Carbon-related border adjustment |  |  |  |
| 6.59.5 | Third party verification of declared emissions of imported oil and/or gas |  |  |  |
| **6.60** | If the **disclosure** of an emissions certificate or statement is recommended or required, does the **policy tool** recommend or require the third-party verification of this data? Select the appropriate response using an X. | | | |
| 6.60.1 | Not specified |  | | |
| 6.60.2 | Recommend |  | | |
| 6.60.3 | Require |  | | |
| **6.61** | If a **methane intensity standard** is recommended or required, does the **policy tool** define **methane intensity** and/or provide guidance on how it is to be calculated? If yes, please describe, referencing the relevant section/subsection/paragraph. | | | |
|  |  | | | |

### 6.4.2 Coal-Related Methane Emissions

|  |  |  |
| --- | --- | --- |
| **6.62** | Does the **policy tool** recommend or require limitations on routine **venting and flaring** associated with coal? Select the appropriate response using an X. | |
| 6.62.1 | Not specified |  |
| 6.62.2 | Recommend |  |
| 6.62.3 | Require |  |
| **6.63** | Does the **policy tool** recommend or require a ban on routine **venting and flaring** associated with coal? Select the appropriate response using an X. | |
| 6.63.1 | Not specified |  |
| 6.63.2 | Recommend |  |
| 6.63.3 | Require |  |
| **6.64** | If response to question above is “Recommend” or “Require”, are there any exceptions to this ban? Is yes, please describe the exceptions, referencing the relevant section-sub-section/paragraph of the **policy tool**. | |
|  |  | |
| **6.65** | Does the **policy tool** recommend or require a standard for the capture, recovery, and use of coal mine and/or coal bed methane? Select the appropriate response using an X. | |
| 6.65.1 | Not specified |  |
| 6.65.2 | Recommend |  |
| 6.65.3 | Require |  |
| **6.66** | If response to question above is “Recommend” or “Require”, are there any exceptions to these standards? Please describe the exceptions, referencing the relevant section-sub-section/paragraph of the **policy tool**. | |
|  |  | |
| **6.67** | Does the **policy tool** recommend or require any of the following? Select all that apply using an X. | |
| 6.67.1 | Incentives for the **reclamation and/or rehabilitation of mines** |  |
| 6.67.2 | The development of plans to mitigate methane emissions from abandoned coal mines |  |
| 6.67.3 | **CMM drainage systems** |  |
| 6.67.4 | Other |  |
| **6.68** | If “Other” is selected above, describe the recommendations or requirements on **targeted entities**, referencing the relevant section/sub-section/paragraph of the **policy tool**. | |
|  |  | |

### 6.4.3 Agriculture-Related Methane Emissions

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **6.69** | Does the **policy tool** recommend or require the measurement of agriculture methane emissions? Select the appropriate response using an X. | | | | |
| 6.69.1 | Not specified | | |  | |
| 6.69.2 | Recommended | | |  | |
| 6.69.3 | Required | | |  | |
| **6.70** | Does the **policy tool** recommend or require third party verification or assurance of agricultural methane emissions? Select the appropriate response using an X. | | | | |
| 6.70.1 | Not specified | | |  | |
| 6.70.2 | Recommended | | |  | |
| 6.70.3 | Required | | |  | |
| **6.71** | Does the **policy tool** recommend or require any of the following measures related to methane emissions from agriculture? Select all that apply using an X. | | | | |
|  |  | Require | Recommend | | Not specified |
| 6.71.1 | The use of feed additives to mitigate **enteric methane** |  |  | |  |
| 6.71.2 | The use of feed ratios to mitigate **enteric methane** |  |  | |  |
| 6.71.3 | Livestock breeding to reduce livestock-related methane emissions |  |  | |  |
| 6.71.4 | Herd reduction as a strategy for mitigating livestock-related methane emissions |  |  | |  |
| 6.71.5 | Incentives for **pasture-based systems** |  |  | |  |
| 6.71.6 | **Biogas digesters** |  |  | |  |
| 6.71.7 | **Solid-liquid separation** |  |  | |  |
| 6.71.8 | **Acidification** |  |  | |  |
| 6.71.9 | Ban on or the cessation of burning **rice straw and stubble** |  |  | |  |
| 6.71.10 | Technologies or procedures to reduce rice-related methane |  |  | |  |
| 6.71.11 | Other |  |  | |  |
| **6.72** | If “Recommended” or “Required” is chosen above, does the **policy tool** offer economic subsidies and/or grants to encourage the uptake of these measures? Select all that apply using an X. | | | | |
| 6.72.1 | Not specified |  | | | |
| 6.72.2 | Subsidies |  | | | |
| 6.72.3 | Grants |  | | | |
| 6.72.4 | Research & development funding |  | | | |
| 6.72.5 | Other |  | | | |
| **6.73** | Describe the economic subsidies or grants mentioned in the **policy tool** to encourage the uptake of **methane abatement** measures. Please reference the relevant section/sub-section/paragraph of the **policy tool**. | | | | |
|  |  | | | | |

## Section 6.5: Standards and Frameworks

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **6.74** | Which of the following standards and/or frameworks is referenced or required? | | | |
|  |  | Required | Recommended/Referenced | Neither recommended nor required |
| 6.74.1 | IPCC inventory methodology |  |  | X |
| 6.74.2 | Global Methane Pledge |  |  | X |
| 6.74.3 | OGMP (UNEP) |  |  | X |
| 6.74.4 | MiQ |  |  | X |
| 6.74.5 | BS: EN 15446 |  |  | X |
| 6.74.6 | EPA Leak Detection and Repair A Best practice Guidance |  |  | X |
| 6.74.7 | Energy Institute - Protocol for the Estimation of Petroleum Refinery Process Plant Fugitive VOC Emissions 2010 |  |  | X |
| 6.74.8 | ISO 15848-1:2015 |  |  | X |
| 6.74.9 | ISO 15848-2:2015 |  |  | X |
| 6.74.10 | ISO 14064-2:2019 |  |  | X |
| 6.74.11 | API 2000:2014 |  |  | X |
| 6.74.12 | ISO:28300:2008 |  |  | X |
| 6.74.13 | EPA: Protocol for Equipment Leak Emission Estimates (1995) |  |  | X |
| 6.74.14 | Landfill Gas: Industry Code of Practice – The management of Landfill Gas |  |  | X |
| 6.74.15 | Method 21 – Determination of Volatile Organic Compound Leaks |  |  | X |
| 6.74.16 | ISO/TC 263 Coalbed methane |  |  | X |
| 6.74.17 | FAO Livestock Environmental Assessment and Performance (LEAP) Partnership |  |  | X |
| 6.74.18 | Global Dairy Sustainability Framework (GDSF) |  |  | X |
| 6.74.19 | National/subnational standard (Describe below) |  |  | X |
| 6.74.20 | Other ISO standard (Describe below) |  |  | X |
| 6.74.21 | Other (Describe below) |  |  |  |
| **6.75** | List **any other** standards, frameworks or guidelines required by or referred to within the **policy tool**. Please provide a **web-archived link** to each standard/framework/guideline listed | | | |
|  | The KSA GCOM Guideline does not formally require or reference any of the specific international standards or frameworks listed in Q6.74. However, it does refer to and align with the following broader frameworks and best practices:   1. **Task Force on Climate-related Financial Disclosures (TCFD) – used as a guiding framework for climate risk disclosures and governance practices.**  * Reference: GCOM Guideline, Section 4.2.1 and 6.1 * Web-archived link: <https://web.archive.org/web/20230718073341/https://www.fsb-tcfd.org/>  1. **Basel Committee on Banking Supervision (BCBS) Principles – referenced for integrating climate-related risks into financial supervision and risk management.**  * Reference: Sections 3.2 and 6.1 * Web-archived link: <https://web.archive.org/web/20230907155136/https://www.bis.org/bcbs/publ/d534.htm>  1. **Network for Greening the Financial System (NGFS) – mentioned as a benchmark for scenario analysis and supervisory practices.**  * Reference: Section 6.2 * Web-archived link: <https://web.archive.org/web/20230818113835/https://www.ngfs.net/en> | | | |
| **6.76** | Note any additional important information about the **policy tool** not captured in the above questions. If referencing **new sources**, provide a **web-archived link** to the source material. | | | |
|  | * The KSA GCOM Guideline is a non-binding supervisory tool, intended to enhance the capacity of financial institutions and regulators to identify, manage, and disclose climate-related risks. * It reflects a phased approach, starting with voluntary implementation, with an expectation that elements may become enforceable through future regulation. * The guideline promotes the integration of ESG and climate-related considerations into risk management frameworks and internal governance structures across banks and insurers. * It emphasizes the importance of local context and market readiness, encouraging institutions to develop internal capacities while aligning with evolving global best practices. | | | |