

## Comments from Smart Freight Centre Submitted by email on 17 August 2020

Dear Gold Standard,

Thank you for the opportunity to comment on your upcoming report, *Operationalising and Scaling Post-2020 Voluntary Carbon Market*. Our organization, [Smart Freight Centre](#), is dedicated to advancing a low carbon freight, and we see carbon offsets as a key potential level to achieving this goal.

A few comments on your excellent report:

1. Please see the attached document that represents our vision for offsets in freight transportation, as well as how industry is already embracing carbon offsets as a strategy for freight decarbonization. We would be thrilled to see transportation more concretely represented in your future work and would be happy to provide more information on how that could look.
2. We see an important role for carbon offsets as a lever for investment in supply chain transportation activities - for example, where a company may not be willing to pay a premium for a higher cost / lower carbon transportation option, they may be willing to invest in carbon offsets that decarbonize freight operations in their own supply chain - a practice referred to as carbon insets. While carbon insets may need their own set of rules or accounting practices, we feel this is an important step that the industry needs to take and is something that we are interested in exploring further with partners like Gold Standard.
3. It is important for groups like Science-Based Targets to recognize carbon offsets/insets as a viable mechanism for reaching climate goals. Without that, we see that companies are more redundant to use offsets/insets for their supply chain decarbonisation.
4. There is a need to define how carbon offsets/insets should apply to freight transportation, both in terms of proper carbon accounting as well as how double-counting, additionality, and leakage should be defined specifically for transport, and how these concepts would need to be defined for both supply chain carbon insets and traditional carbon offsets.

These four ideas are both our comments on the Gold Standard report as well as issues we are actively working with our partners in the [Global Logistics Emissions Council](#).

Smart Freight Centre has published two carbon accounting methodologies related to freight transport, for GHGs and black carbon, and believe there is an urgent need to extend these widely-used methods to provide guidance for freight transport offsetting/insetting. Smart Freight Centre is interested in discussing this idea with the Gold Standard. You can learn more about our methods on [our website](#) and you can also download the GLEC Framework and the Black Carbon methodology documents [here](#). You will find that the GLEC Framework has the [built on GHG protocol mark](#), [supported by CDP](#) and [used by leading multinationals](#).

We will be happy to further discuss and engage with you moving forward. Please let us know your thoughts.

Thanks and best regards,