

Beginning January 2, 2011, states will be required by U.S. EPA to begin permitting greenhouse gas emissions from "major sources". Many thought that due to the majority swing in Congress that greenhouse gas regulation would simply fade away. However, as a result of U.S. EPA's greenhouse gas endangerment finding under the Clean Air Act, EPA must act if Congress fails to do so.

Given the situation, Ohio Governor Ted Strickland recently signed an executive order authorizing emergency rules that require large emitters of greenhouse gases to obtain clean air permits for their Ohio operations. This will enable Ohio businesses to operate without additional federal red tape and regulations. Unless Congress finds a way to reverse EPA's endangerment finding, regulation of some form will be a reality.

Regulation, however, is not the only driver for greenhouse gas. Stakeholders in the form of customers, suppliers, and the public are making disclosure demands. The U.S. Securities and Exchange Commission has adopted rules that require public companies to disclose the potential impacts of climate change. The SEC is responding to investors who want to know the potential risks to the profits and operations of an organization as a result of climate change protection laws. Also noteworthy on the climate change regulation front was the recent decision by a DC-area county to institute a carbon tax in the wake of federal gridlock on the issue.

Will your organization be regulated? Do you know what your carbon footprint is and how best to reduce it? What are your liabilities and do they pose a significant threat to your profitability in the future?

For many, the process of answering these questions begins with the development of a greenhouse gas inventory. A proper inventory is a detailed account of direct and indirect emissions which can include emissions associated with the procurement of raw materials or the use of your product by the end user depending on your industry. Affinity can help you answer all of these questions with in-house expertise including certified Greenhouse Gas Verifiers (GHG-V).

For details on EPA's Mandatory GHG Reporting Rule, visit: <http://www.epa.gov/climatechange>.