Advanced and Indirect Mitigation (AIM) Platform

Governing Committee Meeting Minutes | December 17, 2025

An initiative jointly developed by:

C2ES
CENTER FOR CLIMATE AND ENERGY SOLUTIONS

CENTER FOR GREEN MARKET ACTIVATION

Gold Standard®

The Advanced and Indirect Mitigation (AIM) Governing Committee
December 17, 2025 | 10:00AM – 12:00 AM US Eastern Time | Meeting #28

Attendees (via Teams):

Governing Committee Members:

- Alexia Kelly (High Tide Foundation)
- Devon Lake (Meta)
- Jordan Faires (EDF)
- Kerry Constabile (Amazon)
- Marvin Henry (WBCSD)
- Kelly Kizzier (BEF)

Observers:

- Brad Schallert (Winrock)
- Jonathaon Alcock (Verra)
- Nemi Vora (Amazon)
- Patric Puetz (SFC)
- Cynthia Cummis (Deloitte)

Secretariat:

- Kristen Mertens (GMA)
- Laura Draucker (GMA)
- Laura Hutchinson (GMA)
- Michelle Kołacz (GMA)
- Sam Pearl Schwartz (GMA)
- Stacey McCluskey (GMA)
- Owen Hewlett (Gold Standard)
- Rebecca Berg (C2ES)
- Verena Radulovic (C2ES)

Discussion Topics:

Introduction

- Stacey McCluskey welcomed the Governing Committee and Observers to the meeting and provided an overview of the agenda.
- Stacey McCluskey provided a recap of the last Governing Committee meeting. She introduced Marvin Henry, who expressed gratitude for the opportunity to join and shared enthusiasm about collaborating with the team through the end of the year and into the new one.
- Stacey McCluskey reiterated that the appointment of any new Governing Committee members will be on hold until after the March publication but encouraged everyone to keep identifying potential candidates for future consideration.

AIM Platform Updates

- Stacey McCluskey thanked Governing Committee members and Observers for attending the final QAR pilot tester meeting. Stacey provided a high level summary of what was discussed and noted a lot of the topics would be revisited during this meeting.
- Stacey McCluskey reviewed the AIM Platform's ambitious timeline to release the Standard and Guidance in March. As part of this, Stacey reiterated expectations for Governing Committee members in order to meet the deadline.
- Stacey McCluskey reminded Governing Committee members that if they cannot attend a meeting, they can appoint an alternate on their behalf, watch the recordings, or schedule a one-on-one call to address questions or concerns.

Proposed Table of Contents

- Stacey McCluskey reminded the attendees of the goal to merge the Association Test and QAR into one document to address confusion noted during pilot testing and public consultation, where overlapping concepts and unclear interactions between the two documents were identified. She explained that this approach is intended not only to resolve those issues but also to reduce the overall page count and make the document easier for companies to understand and navigate.
    - Stacey McCluskey clarified that the proposed structure and flow chart may be updated based on Governing Committee feedback and upcoming discussions.
- Stacey McCluskey shared that the merged document will be organized in the following order:

- **Introduction**: Covers the Purpose of the AIM Platform Standard and Guidance, the Mission, Vision, and Objectives of the AIM Platform, the Position of the AIM Platform within the Broader Standards Ecosystem, an overview of AIM Platform Governance & Standard Development Process, and key Standard Terminology.
- **Summary**: Includes a flow chart based on the assumed timeline companies are expected to follow when using the AIM Platform Standard and Guidance.
    - Stacey McCluskey walked everyone through the draft flow chart, which guides companies through pre-intervention planning, contracting, and post-intervention phases, showing decision paths for data use and AIM Platfomr requirements.
        - A Governing Committee member commented that the flow chart will be very useful. They asked if the sizing requirement should state "smaller or equal to the inventory hotspot" instead of just "smaller."
            - Stacey McCluskey acknowledged this point and confirmed the wording will be updated.
        - Another Governing Committee member asked if there was a hierarchy to the branching paths.
            - Stacey explained there is no hierarchy and that it is designed to give companies flexibility in choosing how to account for and report intervention outcomes.
- **Association Test**: Focuses on the Basic and Further Association. The lengthy "Preparing for the Association Test" guidance will move to appendices for optional reference, making core requirements easier to find. Guidance will also be included for companies that have already contracted interventions before applying the AIM Standard.
- **Intervention Quality**: Outlines safeguards and implementation mechanisms that companies should meet before contracting and during intervention execution
- **Accounting**: Translates intervention outcomes to ensure they can be accurately accounted for and reported in a contractual or impact ledger.
- **Reporting**: Ensuring interventions applied to a corporate inventory are reported in a transparent and credible way.
- **Assurance**: Details assurance requirements for AIM Platform compliance and integration with GHG inventories, ensuring transparency and credibility.
- **Appendices**: Includes optional guidance moved from the Association Test, the glossary, an assurance readiness checklist, and other supporting resources for companies seeking additional context.

- Stacey McCluskey opened the floor for further questions or comments on the proposed table of contents. None were raised.

<u>QAR Feedback Discussion</u>

- Michelle Kołacz provided a comprehensive summary of feedback from the pilot test and public consultation.
    - Key Themes Identified in the Pilot:
        - Flexibility: Intervention hosts emphasized the need to reduce administrative burden and allow greater reliance on sector norms.
        - Clarity and Consistency: Reporting companies requested clearer, more consistent information to assess adherence to criteria, particularly where supply chain visibility is limited.
        - Balance of Robustness and Practicality: Strong support for rigorous accounting standards, coupled with a call to calibrate requirements to avoid disproportionate cost or complexity, especially for smaller or early-stage interventions.
        - Obligations vs. Needs: Feedback highlighted the importance of balancing the needs of investing companies and intervention hosts' obligations.
        - Guardrails: Clear guidance sought on timing, interventions without registries, and program-specific accounting methods to instill confidence in application.
    - Public Consultation Reinforcement:
        - Respondents echoed the need for simpler language, clearer definitions, and practical examples, particularly on avoided emissions, accounting approaches, and registry requirements. Broad support for credible reporting and assurance, balanced against concerns over cost and scalability. Emphasis on trust and claims, with safeguards around co-claiming and timing, while maintaining flexibility to align with existing frameworks.
- Michelle Kołacz concluded this section by expressing appreciation for the committee's collaboration and noted the conclusion of her Graduate Internship before transitioning the discussion to Laura Draucker for a deep dive into focus areas.
- Laura Draucker shared the two focus areas for the meeting:
    - Accounting Methods & Ledgers
    - Unique Right to Report, Co-claiming, and Transparent Disclosure
- **Accounting Methods Discussion**
    - Laura Draucker shared that pilot testers raised confusion between Substitution and Enhanced Substitution methods, noting unclear boundaries and complexity in application.
    - Laura Draucker proposed merging Substitution and Enhanced Substitution into one method, with optional adjustments to simplify guidance and reduce

confusion while also ensuring accurate matching between inventory activities and intervention outcomes.
        - A Governing Committee Member asked how a company will know whether they need to adjust for geography?
            - Laura Draucker responded saying guidance and examples will be added to clarify when geographic adjustments are needed, as impacts vary by context. She responded to a follow-up question and said that they would not go as far to call it sector-specific examples, but that they would provided examples that could be interpreted as such.
    - Laura Draucker proposed the removal of Activity Estimation as a standalone method, sharing that only one pilot tester used it and found it confusing. After reviewing feedback, the Secretariat determined it is more of a tool to help translate spend data into activity data rather than an accounting method.
        - The Governing Committee agreed on removing Activity Estimation as an accounting method option.
    - Laura Draucker shared feedback that the distinction between "Project" and "Program Specific" methods is not clear.
        - Laura Draucker proposed:
            - Clarifying that Program Specific methods are accounting methods defined externally for a specific intervention type.
            - Providing additional examples, to help clarify how various program-specific methods would link to the other methods and feed into a ledger.
            - Considering minimum criteria for Program Specific methods to ensure consistency.
- **Unique Right to Report, Co-Claiming & Disclosure**
    - Laura Hutchinson outlined current structure for managing double counting risks, including intervention records, agreements, co-claiming rules, and intervention host/supplier disclosure.
    - Laura Hutchinson summarized feedback noting the need for clearer guidance on co-claiming when companies contract through intermediaries, clarification that intervention hosts do not control co-claiming, examples for passing outcomes downstream, and better instructions for implementing co-claiming in systems of record, along with a call to consolidate and make requirements consistent across chapters.
    - Laura Hutchinson clarified that reporting companies can disclose intervention outcomes to their value chain if they have secured this right in their agreement,

and emphasized that co-claiming should be jointly managed by the intervention host and reporting company to prevent overlaps and double claiming.
    - A Governing Committee member asked whether co-claiming or double claiming applies to both physical and contractual inventories or across multiple suppliers in the supply chain. Laura Hutchinson clarified that while both scenarios are relevant, the guidance primarily focuses on contractual inventory, with physical disclosure treated as a separate issue.
- Laura Hutchinson brought the discussion back to the topic of physical disclosure, reminding the group that this was a key issue extensively debated prior to releasing the QAR for pilot testing and public consultation. She shared that there was quite a bit of engagement on this topic in the feedback as well. Specifically, question themes that pilot tester raised were: 1) How do we would deal with the input to intervention outcome disclosure?, and 2) Is it reasonable to require the intervention host to provide inaccurate emission data, and in particular, residual emissions data? Would providing average data be more reasonable?
- Laura Hutchinson outlined that the Secretariat is trying to address these issues.
    - Issue: Reporting companies that pay for interventions need to know that they have unique rights to report those outcomes, avoiding free riding.
        - Proposed Change:
            - Intervention hosts communicate that their physical customers may not use specific intervention data for reporting (slight adjustment)
            - Add recommendation to transparently disclose why
    - Issue: Physical customers need to continue to receive accurate data per agreements, regulations and industry norms.
        - Proposed Change:
            - When required, intervention hosts may share intervention data (inputs and/or emissions) but must state that physical customers cannot use these data for reporting.
            - Should share average factor as alternative for reporting.
    - Issue: Residual emissions factors aren't accurate inputs to a physical inventory, can't break accounting norms.
        - Proposed Change:
            - Recommend that intervention hosts may share an average emissions factor instead

        - A Governing Committee member commented that the language "may not" in the proposed change is very confusing and overly prescriptive.
            - Laura Hutchinson acknowledged the comment and shared that the goal was to strike a balance between the critical nature, and the feedback we heard on the difficulty of enforcement.

Next Steps

- Laura Hutchinson outlined the upcoming timeline again and expressed appreciation for members' continued engagement.
    - Laura Hutchinson reminded everyone that the hope is to share a first draft of the Standard and Guidance around January 12th, followed by the back-to-back meetings in January to review and discuss feedback.
- Laura Hutchinson emphasized the importance of allocating time for review and noted that a summary of pilot and consultation feedback will be distributed after this meeting for additional context.
- Laura Hutchinson encouraged members to stay engaged or appoint alternates if needed and closed by thanking participants and wishing them happy holidays.

Meeting concluded at approximately 12:06 PM US Eastern Time.