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The Joint Secretary
Ministry of Environment, Forest and Climate Change
Indira Paryavaran Bhawan
Jor Bagh Road, New Delhi - 110003

June 13, 2025

Dear Sir/Madam,

Subject: Submission of comments on the Draft Greenhouse Gas Emission Intensity (GEI) Target Rules, 2025

I am writing on behalf of Citizen, Consumer, and Civic Action Group (CAG), Chennai, a 39-year-old non-profit organisation working towards protecting citizens' rights in consumer, civic, and environmental issues and promoting good governance processes, including transparency, accountability, and participatory decision-making.

We welcome the Ministry of Environment, Forest and Climate Change's release of the draft notification on Greenhouse Gas Emission Intensity (GEI) Targets, 2025, which is a timely and crucial step towards operationalising India's carbon market under the Carbon Credit Trading Scheme (CCTS). This initiative plays a vital role in supporting India's Nationally Determined Contributions (NDCs) and promoting industrial transition toward low-carbon pathways.

We appreciate the Ministry's efforts in defining sector-specific GEI targets and establishing a framework for compliance. However, as an organisation working closely on climate mitigation, carbon markets, and industrial decarbonisation, we have conducted a detailed review of the draft and would like to respectfully submit our comments and recommendations (attached as a PDF document) for your kind consideration.

Our recommendations aim to strengthen the implementation framework, improve clarity on monitoring and verification processes, and ensure that the targets drive real emissions reductions while supporting fair and inclusive industry participation.

We sincerely urge the Ministry to consider our inputs as it finalises the notification. We would also be happy to engage further should there be an opportunity for stakeholder consultations or technical discussions.

Thank you for the opportunity to contribute to this significant policy development.

Regards,

S. Saroja
Executive Director

Attachments: Comments on GEI Target Notification_2025

TRUSTEES

Mr. H. Ashok Vardhan Shetty IAS (retd)
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S.No.:	Section	Existing text	Revised text	Comments
1	Definitions (2e)	GEI means greenhouse gases emission intensity in tCO ₂ e/equivalent output or product.		Ambiguous without sector-specific elaboration. Recommend adding an annex with examples of equivalent products for each sector.
2	3. Objectives	To contribute to the attainment of the Nationally Determined Contribution by reducing GEI..	To contribute to the attainment of the Nationally Determined Contribution by reducing GEI ensuring equitable burden sharing and just transition for vulnerable sectors	The objective should also explicitly mention equity and just transition, acknowledging the differentiated capacities of industries and regions to reduce emissions.
3	4(1) GEI Targets	GEI Targets shall be calculated as per the methodology described in the Detailed Procedure as published by Bureau.		The methodology must be publicly accessible, transparent, and open to third-party expert review to build credibility and stakeholder trust.
4	5. Obligations of the Obligated Entity	Lists registration, reporting, and compliance obligations on ICM Portal.		Consider including provisions for technical assistance and capacity-building, especially for MSMEs, to enable fair participation and prevent market capture by large players.
5	6(2) Issuance of CCCs	(GEI Target for that compliance year – GEI Achieved in that compliance year) x unit of equivalent product produced in that compliance year;		Clarify what qualifies as “equivalent product” across sectors. Define rules and minimum thresholds for CCC issuance to prevent disputes.
6	6(3) CCC Purchase Requirement	(GEI Achieved for that compliance year – GEI Target in that compliance year) x unit of equivalent product produced in that compliance year		Same as above - Standardise definitions and norms needed for transparent implementation
7	7(3) Use of Penalty Funds	The fund collected under the Environmental Compensation shall be maintained in a separate account and utilized for the purposes of Carbon Credit Trading Scheme on the recommendation of the National Steering Committee for Indian carbon market and subsequent approval of the Central Government.		Introduce a provision for public disclosure of fund usage through an annual report and allow for independent auditing
8	8. Violations	Any violation of provision of these Rules shall be dealt under the provisions of the Environmental Protection Act, 1986.		Add provision for a grievance redress mechanism or appeal process under the Indian Carbon Market framework to ensure procedural fairness.
9	General	No mention of voluntary carbon markets or interface with existing schemes like PAT, REC, etc.		Recommend inclusion of a clause acknowledging the role of voluntary markets and ensuring no double counting.