



MINISTRY OF ENVIRONMENT
REGIONAL OPERATIONS BRANCH

ANNUAL STATUS FORM
FREQUENTLY ASKED QUESTIONS

1. What is an annual status form?

An annual status form (ASF) is used to report your compliance status for ALL of your authorization requirements under the *Environmental Management Act* (EMA). In the case of any non-compliance, the ASF provides a summary of actions taken to remedy non-compliances. It will accompany your annual report as an appendix.

2. Who has to submit an annual status form?

If you pay annual discharge fees exceeding \$20,000 or are required to post security and/or mine reclamation bonds exceeding \$100,000, and you are required to submit an annual report, you are required to submit an ASF. Some larger municipal authorizations related to liquid and solid waste management plans may also be required to submit an ASF.

3. I have multiple authorizations under the EMA at my facility. Do I add up the annual fees/security/reclamation bonds for all my authorizations to determine if I meet the threshold?

No. Each of your authorizations should be assessed against the threshold (see above) independently. Do **not** add up the annual fees/security/reclamation bonds for multiple authorizations at one facility.

4. My authorization meets the threshold for annual fees/security/reclamation bonds, but does not require me to submit an annual report. Do I have to submit an annual status form?

No. Only submit if you meet the monetary threshold (see above) and are required to submit an annual report.

5. How are annual status forms submitted?

Annual status forms must be submitted as an appendix with your annual report.

6. When does this requirement take effect?

This requirement takes effect on January 1, 2016. This means that all 2015 annual reports due on or after January 1, 2016, will require an annual status form.

7. I didn't receive an annual status form template, where can I find one?

The annual status form template can be found on the ministry's website. Please visit <https://www2.gov.bc.ca/gov/content/environment/waste-management/waste-discharge-authorization/data-and-report-submissions/annual-status-form>

8. What information do I need to complete the annual status form?

You will need a copy of your authorization and information to support the determination of compliance. You will also need the annual status form template and instructions.

9. What would be deemed acceptable 'supporting documentation' for determination of compliance?

You should provide enough information such that a reasonable person could make sense of the compliance status and follow up actions (if any) for the clause in question. Use your judgement. In most cases a simple reference (i.e. page number) to the detailed information in the main body of the report would be sufficient. You may receive feedback on the level of detail from ministry staff in the future.

A good strategy that we encourage would be to complete a draft of the form and then if you desire ask a ministry contact for some feedback on your level of detail.

10. Some authorization requirements are vague and subject to interpretation. How do I fill out the form for these requirements?

Fill out the form using a reasonable interpretation of the requirement in your authorization. If in the future a ministry employee reviews your information and does not agree with your interpretation, they will work with you to come to a common understanding.

If you are unable to interpret a requirement, please contact the ministry to discuss.

11. Does the annual status form have to be completed every year?

Yes. However, if amendments have been made to your authorization, you must add any new conditions or remove any old conditions.

12. How do I know which sections of my authorization to include?

All conditions which have an associated requirement or limit should be included in the annual status form. Condition headings should not be included.

Please see the annual status form Examples for guidance.

13. What should be included in the “ACTION TAKEN” column?

If you had a non-compliance, please indicate what actions were taken to remedy to situation. If you were in compliance, you may provide details of your operations or any other actions that lead to your success.

14. Our annual report details non-compliance issues, why do we have to provide an annual status form too?

The annual status form provides a comprehensive snapshot of compliance status for your authorization. It will act as a reference document for ministry staff. Detailed non-compliance information presented in the annual report should supplement the summary information provided in the annual status form.

15. How will the annual status form affect my compliance status?

The annual status form will be used by the ministry as a source of information during the normal course of inspections. It may be used together with other information to support normal compliance and enforcement activities in accordance with ministry policy.

16. What happens if I make a mistake and say I’m compliant, but I am not?

It is the authorization holder’s responsibility to accurately report compliance status for each listed condition.

If the reported compliance is incorrect due to an administrative error, lack of data, incorrect data or other mistake, ministry staff will work with the authorization holder to correct the mistake.

Intentionally misleading the ministry with regards to compliance is a violation of the *Environmental Management Act*.

17. What if I do not know if compliance has been met?

Record “No” in the “COMPLIANCE STATUS” and in the “ACTION TAKEN” field you can explain why the information is unknown and what you will do to obtain the information.

18. In the course of completing the annual status form I came across a section in my authorization that refers to works or pollution control equipment that are no longer in place, or activities that no longer occur. What should I do?

If the authorization no longer reflects your current operations or processes, it is your responsibility to apply for an amendment (in the case of a permit) or submit updated information (in the case of a registration).

Information about applying for a permit amendment and instructions for submitting updated information for registrations under a regulation is available on the ministry's website. Please visit <http://www2.gov.bc.ca/gov/content/environment/waste-management/waste-discharge-authorization/permit-or-approval-application-process>

19. Who can complete and sign the form on behalf of the company?

Any party designated by the authorization holder can complete the ASF form and sign it. This could include the environmental manager, technician, corporate officer, consultant engineer, etc.

20. The annual status form template that the ministry provided does not work for me. Can I submit my form using a different format or structure?

You may modify the template format for your purposes if you include the same information, including a signature field.

21. I submit quarterly reports. Do I include an annual status form with quarterly reports?

No. Only submit an ASF with annual reports.

22. I have more questions about the annual status form. Who should I contact?

If you have additional questions please contact your regional ministry office. Regional office contact information can be found at the following website:
<http://www.env.gov.bc.ca/main/regions.html>