

Greenhouse Gas Industrial Reporting and Control Act Bulletin

Temporary allowance for conducting site visits virtually as part of the verification process of an emission report

Greenhouse Gas Emission Reporting Regulation

Overview

It is recognized that we are facing rapidly changing situations as we cope with the effects of COVID-19 in our province. Everyone in British Columbia (B.C.) must follow the orders and directives issued by the Provincial Health Officer (PHO) to protect public health, and it is recognized it could have impacts on the day-to-day operations of regulated activities under the *Greenhouse Gas Industrial Reporting and Control Act* (GGIRCA).

This bulletin provides information on recent amendments (OIC#158) to the Greenhouse Gas Emission Reporting Regulation ('the Regulation' or 'GGERR') that provide the director under GGIRCA discretion to allow verification bodies the ability to conduct required site visits virtually in accordance with the directions of the director as part of a verification process.

Requirements of the GGIRCA and its regulations remain in effect and it is expected that all reasonable measures should be taken to comply. For clarity, the above-noted amendments only apply to the 2019 reporting period.

Now is a good time to carefully review requirements and develop plans and contingencies to ensure operations are maintained in accordance with the requirements for the forseeable future. Please provide notice of any concerns or issues to the attention of the Compliance Unit for Industrial Reporting and Control at GHGRegulator@gov.bc.ca.

Site Visits Conducted Virtually

In relation to a Subject Emission Report, a verification body may conduct a site visit required under ISO 14064-3 and s. 30(2)(d) of the Regulation virtually and must do so in accordance with the <u>International Accreditation Forum Mandatory Document for the Use of Information and Communication Technology for Auditing/Assessment Purposes: Issue 2 (IAF MD4:2018)</u> and in accordance with any related guidance issued by the verification body's applicable accreditation body referred to in s. 26(1) of the Regulation.

Verification bodies must ensure that documentation required by IAF MD4:2018 (e.g. section 4.2 – Process Requirements) is retained and provided to Operators as part of the related verification plan and report. The director or an inspector under GGIRCA may request records from the Operator to verify compliance with the Regulation and this Bulletin or to support the administration of the GGIRCA.

In accordance with s. 33(2)(i) and (j) of the Regulation, verification bodies must also ensure they note either under "Section 2 – Verification Procedures" of the required verification statement or as an addendum to the verification statement:

- whether a site visit was conducted virtually and/or in-person at the premises of the operation and whether a site visit was not completed as required;
- a summary of findings of the plan developed in accordance with Section 4.2.3 of IAF MD4:2018 for each operation, including:
 - indication of the information communication technology (ICT) used to support each respective site visit conducted virtually; and,
 - o the related risk assessed with use of the ICT used and how this risk was managed; and,
- any other information relevant to the declaration under Section 3 of the verification statement.

Regulation is Determinative

The above is not legal advice and is provided as an aid in understanding the Regulation. Operators are responsible for reviewing the Regulation to ensure compliance with it.

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