

	<b>Ministry of Energy Mines and Low Carbon Innovation</b>  <i>Issued: August 2015 Revised: March 2024</i>	<i>Low Carbon Fuels Act</i>  <b>Transfer of Compliance Units</b>  <b>Information Bulletin RLCF-013</b>
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## Background

Beginning in 2024, to participate in the credit market, an organization must be registered by the director in accordance with the Low Carbon Fuels (General) Regulation (LCFGR) under section 17. Fuel suppliers who actively participated in the credit market in 2023 will automatically be registered by the director in accordance with the LCFGR for the 2024 compliance period. The director holds discretionary authority to refuse, suspend, or cancel an organization's registration.

Compliance with the low carbon fuel requirements of the *Low Carbon Fuels Act* (Act), is calculated in terms of positive compliance units (credits) for marketing low carbon fuels and negative compliance units (debits) for marketing high carbon fuels as specified by section 13 of the Act. A registered organization may transfer issued credits in order to achieve compliance with the low carbon fuel requirements.

The Low Carbon Fuel Standard has historically referred to compliance units as credits and debits. Beginning in 2024, the terminology is updated to compliance units (positive or negative).

## Compliance units issued by the director

Before credits can be transferred, they must be issued by the director. Compliance units are issued based on the submission of an annual compliance report or the completion of a milestone under an initiative agreement. Compliance units that are issued by the director in relation to a milestone under an initiative agreement are valid when they are awarded.

## Fair market value

All transfers must include a "fair market value" of the consideration in Canadian dollars per credit, under section 18 of the LCFGR. Transfers that the director considers are underestimating "fair market value" or those using a "zero dollar" value must include a written explanation justifying the use of the identified value.

The "fair market value" is generally accepted as the dollar figure a credit would sell for on the open and unrestricted market, between a willing buyer and a willing seller who are both knowledgeable, informed, and prudent, and who are acting independently of each other.

## Approval of transfers

All transfers must be approved by the director. A registered organization may submit a transfer for review through the [Transportation Fuels Reporting System](#). The transfer will take effect on the date on which the transfer is approved by the director.

## Application of credits

Only those credits held on the reporting deadline can be applied to a compliance obligation for that compliance period.



## Credit market participants

The following table lists the participants in the market that voluntarily provided contact information. As such, the list may not be complete. The information provided is for convenience only and is accurate at the time of publication.

Organization Name	Role in Market	Contact for Compliance Unit Transactions		
		Name	Email	Phone
4-Less Disposal Inc.	Seller	Andy Brosnan	abrosnan@anewclimate.com	604-243-2568
650273 Alberta Ltd.	N/A	Badru Laiwalla	Badru@centexpetroleum.com	403-289-3100 x 210 / 403-714-3521
AFD Petroleum	N/A	Adrian Treleaven	atreleaven@afdpetroleum.com	587-338-1975
Anew Canada – Low Carbon Fuels	Seller	Andy Brosnan	abrosnan@anewclimate.com	604-243-2568
Arbios Biotech	Seller	Ben Goodier	ben.goodier@arbiosbiotech.com	N/A
BC Hydro	Seller	John Duffy	john.duffy@bchydro.com	604-699-7209
BC Transit	Seller	Andy Brosnan	abrosnan@anewclimate.com	604-243-2568
Belvedere Strata Corporation, The Owners of Strata Plan VIS6102	N/A	Kristy Tamburri	kristy@prolinemanagement.com	250-940-4754
British Columbia Ferry Services Inc.	Seller	Andy Brosnan	abrosnan@anewclimate.com	604-243-2568
Burden Propane Inc.	Seller	Andy Brosnan	abrosnan@anewclimate.com	604-243-2568
Board of Education of School District 41 (Burnaby)	Seller	Sridhar Pathipaka	energy@burnabyschools.ca	604-296-6900 x 661038



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		Name	Email	Phone
Canadian Linen and Uniform Supply	Seller	Andy Brosnan	abrosnan@anewclimate.com	604-243-2568
Cenovus Energy Inc.	Seller/Buyer	Chris Cherkas	chris.cherkas@cenovus.com	403-766-6647
Central Okanagan Public Schools (SD23)	Seller/Buyer	Harold Schock	harold.schock@sd23.bc.ca	250-860-8888
City of Nanaimo	N/A	Laura Mercer	laura.mercer@nanaimo.ca	250-755-4433
City of Nelson	Seller	Graham Vikse	gvikse@nelson.ca	250-352-8285
City of New Westminster	Seller	Patrick Shannon	pshannon@newwestcity.ca	N/A
City of North Vancouver	Seller	Meg Wray	mwrap@cnv.org	N/A
City of Richmond	Seller	Arzan Balsara	abalsara@richmond.ca	N/A
City of Vancouver	Seller	Matt Horne	electric_vehicles@vancouver.ca	N/A
City of Victoria	Seller	Andy Brosnan	abrosnan@anewclimate.com	604-243-2568
Clark Freightways	Seller	Andy Brosnan	abrosnan@anewclimate.com	604-243-2568
Coldstar Solutions Inc.	Seller	Andy Brosnan	abrosnan@anewclimate.com	604-243-2568
Consolidated Biofuels Ltd.	Seller	Dan Treleaven	dtreleaven@consolidatedbiofuels.net	N/A
Copper Mountain Mine (BC) Ltd.	Seller	Walt Halipchuk	walt.halipchuk@hudsonbayminerals.com	604-802-5719



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Dan Foss Industries Ltd.	Seller	Neil Johnston	neilj@danfossCourier.ca	604-544-0711
District of North Vancouver	Seller	Andy Brosnan	abrosnan@anewclimate.com	604-243-2568
District of West Vancouver	Seller	Heather Keith	hkeith@westvancouver.ca	N/A
Elbow River Marketing Ltd.	Seller/Buyer	Randy Richard	Randy@elbowriver.com	N/A
Environmental 360 Solutions Ltd.	Seller	Andy Brosnan	abrosnan@anewclimate.com	604-243-2568
Evergreen Industries	Seller	Andy Brosnan	abrosnan@anewclimate.com	604-243-2568
Federated Co-Operatives Ltd.	N/A	Terry Perras	Terry.perras@fcl.crs	306-719-4208
Foreseeson Technology Inc.	Seller/Buyer	Elden Yee	eldenevse@foreseeson.com	N/A
FortisBC Energy Inc.	Seller	Jamie King	Jamie.king@fortisbc.com	250-304-1456
FortisBC Inc.	Seller	Jamie King	Jamie.king@fortisbc.com	250-304-1456
Gary Young Agencies Ltd.	Seller/Buyer	Taylor Young	Taylor@gya.ca	N/A
Gecko	Seller	Maxime Charron	maxcharron@leadingaheadenergy.com	778-879-3020
GFL Environmental Inc.	Seller	Andy Brosnan	abrosnan@anewclimate.com	604-243-2568
Greenenergy Fuels Canada Inc.	Seller/Buyer	Johannes Dunn	Johannes.Dunn@greenenergy.com	506-647-4818



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HEG Holdings Corp.	Seller	Andy Brosnan	abrosnan@anewclimate.com	604-243-2568
Hollyburn Properties Limited	Seller	Sunny Brar	sunny@hollyburn.com	N/A
HTEC Hydrogen Technology & Energy Corporation	N/A	Colin Armstrong	carmstrong@htec.ca	604-904-0412
Idemitsu Apollo Corporation	N/A	Luke Nguyen	lnguyen@idemitsuapollo.com	916-214-2488
Imperial Oil	N/A	Tanya Farley	tanya.c.farley@esso.ca	403-999-5375
LMS 4661 – Palladio	Seller	Peter Graf	pgraf@psych.ubc.ca	778-232-4644
Martin Brower of Canada Co.	Seller	Wayne Dingee	wdingee@mbcan.com	506-866-8300
McRae’s Environmental Services Ltd.	Seller	Andy Brosnan	abrosnan@anewclimate.com	604-243-2568
Parkland Corporation	Seller/Buyer	Randy Richard	randy@elbowriver.com	403-710-5909
Parkland Refining (B.C.) Ltd.	Seller/Buyer	Randy Richard	randy@elbowriver.com	403-710-5909
Powerex Corporation	N/A	Meredith Aitken	meredith.aitken@powerex.com	604-891-5014
Provincial Health Services Authority	N/A	Ghazal Ebrahimi Pooya Pourrezaiekhalthigh Hana Nguyen	ghazal.ebrahimi@phsa.ca pooya.pourrezaiekhalthigh@phsa.ca Hana.nguyen@phsa.ca	N/A
Resort Municipality of Whistler	Seller	Maria Thorlakson	mthorlakson@whistler.ca	N/A



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		Name	Email	Phone
School District 20 (Kootenay – Columbia)	Seller	Robyn Stephenson	rstephenson@sd20.bc.ca	N/A
School District 22 (Vernon)	N/A	Tracey Syrota	tsyrota@sd22.bc.ca	250-549-9281
School District 35 (Langley)	Seller	Ronald Lam	rlam@sd35.bc.ca	N/A
School District 38 (Richmond)	Seller	Jonathan Ho	joho@sd38.bc.ca	604-812-5224
School District 42 (Maple Ridge – Pitt Meadows)	Seller	Alexandra Tudose	Alexandra_tudose@sd42.ca	604-353-4289
School District 6 (Rocky Mountain)	Seller	Lisa Clifton	Lisa.clifton@sd6.bc.ca	N/A
School District 68 (Nanaimo Ladysmith)	Seller	Mary Zuccaro	Mary.zuccaro@sd68.bc.ca	250-268-4603
Seaspan Ferries Corporation	Seller	Andy Brosnan	abrosnan@anewclimate.com	604-243-2568
SHAPE Property Management Corp.	Seller	Oskar Kwieton	Oskar.kwieton@shape.ca	604-360-1097
Shell Canada Products	Seller/Buyer	Jeff Spring	Jeff.Spring@shell.com	N/A
Shell Trading Canada	Seller/Buyer	Jeff Spring	Jeff.Spring@shell.com	N/A
Squamish Liquor Store (2016) Ltd.	N/A	Maxime Charron	maxcharron@leadingaheadenergy.com	778-879-3020
Strata Plan BCS1345-One University Crescent	N/A	Bruce Clayman	clayman@sfu.ca	604-291-7677
Strata Plan EPS2526	Seller	Robert James	rjames@firmmanagement.com	250-544-2300



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Strata Plan VR1361	Seller	Adam Brand	brand_adam@hotmail.com	604-418-6087
Suncor Energy Products Partnership	N/A	Dylan Kristofic	dkristofic@suncor.com	403-461-7602
Superior Propane	Seller	Kevin Latham	<a href="mailto:KLatham@superiorplus.com">KLatham@superiorplus.com</a>	403-710-3473
SWTCH Energy Inc	Seller	Ernest Yap	<a href="mailto:ernest.yap@swtchenergy.com">ernest.yap@swtchenergy.com</a>	647-598-4099
Town of Smithers	Seller	Jaima Timler	<a href="mailto:jtimler@smithers.ca">jtimler@smithers.ca</a>	N/A
Township of Langley	Seller	Cherry Li	<a href="mailto:cli@tol.ca">cli@tol.ca</a>	N/A
United Farmers of AB Cooperative Ltd.	Seller/Buyer	Alejandra Baroja-Bell	<a href="mailto:alejandra.baroja@ufa.com">alejandra.baroja@ufa.com</a>	403-909-9926
Vancouver Airport Authority	Seller	Wendy Avis	<a href="mailto:environment@yvr.ca">environment@yvr.ca</a>	N/A
Vancouver Community College	Seller	Diana Cabrero Purata	<a href="mailto:dcabreropurata@vcc.ca">dcabreropurata@vcc.ca</a>	236-993-7714
Vancouver Island Propane Services	N/A	Nancy Borden	<a href="mailto:vipropane@shaw.ca">vipropane@shaw.ca</a>	250-479-4227
Waste Connections of Canada	N/A	Darah Papadopoulos	<a href="mailto:Darah.papadopoulos@wasteconnections.com">Darah.papadopoulos@wasteconnections.com</a>	N/A
Waste Management of Canada	Seller	Fran Currier	<a href="mailto:fcurrier@wm.com">fcurrier@wm.com</a>	778-773-1396



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**Need more information?**

Please visit the Low Carbon Fuels [website](#) or email us at [lcfs@gov.bc.ca](mailto:lcfs@gov.bc.ca).

This information is for your convenience and guidance only and does not replace or constitute legal advice. It is recommended that parties who may be a fuel supplier review the *Low Carbon Fuels Act*, Low Carbon Fuels (General) Regulation and the Low Carbon Fuels (Technical) Regulation and seek independent legal advice to confirm their status, legal obligations and opportunities. The *Low Carbon Fuels Act*, Low Carbon Fuels (General) Regulation and the Low Carbon Fuels (Technical) Regulation can be found at: <http://www.bclaws.ca>.