# GETTING STARTED WITH THE B.C. OUTPUT-BASED PRICING SYSTEM

Technical Background and General Program Guidance for Industrial Operators

February 2024



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## PART 1 Context

### **INTRODUCTION**

This program guidance document sets out details of B.C.'s new industrial carbon pricing system – the B.C. Output-Based Pricing System or OBPS – including context, program details, such as program eligibility, stringency, and how to begin participating as an industrial *operator*.

B.C.'s industrial sector is a major contributor to the province's economy that creates jobs, benefits communities, and generates revenue the provincial government uses to provide important services to British Columbians. The sector is also a major source of greenhouse gas (GHG) emissions and, while the sector has taken steps to reduce its emissions, more needs to be done.

*Operator*: The person who owns and/or controls and directs the industrial operation.

### INDUSTRIAL CARBON PRICING IN B.C.

It is widely recognized that putting a price on carbon pollution is one of the most effective and economically efficient ways to reduce GHG emissions and spur innovation. In 2019, the federal government set minimum national stringency standards known as the federal 'benchmark' that all systems must meet to ensure they are comparable and effective in reducing GHG emissions.

At that same time, B.C. launched its CleanBC Program for Industry (CPI) comprised of the CleanBC Industrial Incentive Program (CIIP) and the CleanBC Industry Fund (CIF). CIIP encourages cleaner industrial operations by reducing carbon tax costs for industrial facilities demonstrating that their operations are amongst the lowest emitting for their sector compared to world leading GHG emissions-intensity benchmarks. CIF supports the development, trial, and deployment of projects that reduce GHG emissions from large industrial operations in B.C.

In 2021, the Province released its strengthened climate plan, the *CleanBC Roadmap to 2030*, which included a commitment to better align with the federal government benchmark and enhancing the CPI. As part of that commitment, the Ministry of Environment and Climate Change Strategy's Climate Action Secretariat (ENV) and the Ministry of Finance (FIN) engaged with Indigenous partners, industry, equity-seeking groups, and the Government of Canada throughout 2022 in a carbon pricing review.

The review undertook analysis and sought input on how best to align with new federal carbon pricing rules while continuing to promote a competitive business environment and significant GHG reductions. During the review, ENV heard a strong preference from industry for the Province to move to a madein-B.C. OBPS, an industrial carbon pricing model that encourages emissions reductions and minimizes competitiveness risks. ENV also heard concerns from industry about the current need to pay for carbon tax upfront prior to receiving an incentive payment from the CIIP, as well as an interest in allowing the use of market-based compliance mechanisms such as offsets. As part of Budget 2023, the Province announced a change to the way it prices GHG emissions from industrial operations. To align with the Government of Canada's carbon price path, Budget 2023 included an announcement that, starting April 1, 2023, B.C.'s carbon price would increase to \$65/tonne of carbon dioxide equivalent ( $CO_2e$ ) emissions, rising by \$15/tonne each year until it reaches \$170/tonne in 2030.

The Budget 2023 announcement also included the Province's intention to transition from the CleanBC Program for Industry (CPI) to include a made-in-B.C. OBPS for large industrial emitters, which takes effect on April 1, 2024. As part of this CPI transition, the new B.C. OBPS will replace the CIIP.

### WHAT IS AN OUTPUT-BASED PRICING SYSTEM?

The B.C. OBPS is a carbon pricing model that follows the federal carbon price path, ensures a price incentive for industrial emitters to reduce their GHG emissions through a performance-based system, and provides flexible options, such as B.C. carbon offsets and earned credits, to meet compliance obligations.

Instead of paying the carbon tax on fuels and combustibles that they use or burn, industrial facilities in the system will face a separate carbon price on the portion of their emissions that are above a product-specific emissions limit.

The B.C. OBPS is enacted through recent amendments made in February 2024 to the *Greenhouse Gas Industrial Reporting and Control Act* (GGIRCA) and its regulations.

### **PLANNED REVIEWS**

### **B.C. OBPS Program Review**

To ensure continuous improvement of the new system, the Ministries of Environment and Climate Change Strategy and Finance will review the B.C. OBPS on an annual basis. For example, B.C.'s carbon market will undergo annual reviews to ensure the market functions as intended, all while balancing emission reductions and competitiveness considerations.

### **Federal Review**

By 2026, the federal government will engage provinces, territories, and Indigenous organizations in an interim review of the federal benchmark, to confirm that benchmark criteria are sufficient to continue ensuring that pricing stringency is aligned across all carbon pricing systems in Canada. The review will also consider impacts on inter-jurisdictional and international competitiveness from carbon pricing, and whether additional criteria are needed to address differences between jurisdictions.

### **HELPFUL LINKS**

CleanBC Industrial Incentive Program (CIIP)

CleanBC Industry Fund (CIF)

BC Carbon Registry

B.C.'s Offset Protocol Policy

Greenhouse Gas Industrial Reporting and Control Act (GGIRCA)

Greenhouse Gas Emissions Reporting Regulation (GGERR)

**BCeID Login and Registration** 

BORO ID Statutory Declaration Form

Boundary Map Guidance for Opted-In Operations

LFO 2024 Opt-In Application Form

Process Flow Diagram Guidance for Opted-In Operations

SFO 2024 Opt-In Application Form

## PART 2 Eligibility

Participation in the B.C. OBPS will be mandatory for producers of regulated industrial products under the GGIRCA that emit above 10,000 tonnes of carbon dioxide equivalent ( $CO_2e$ ) per year. See Appendix 1 for a list of regulated products.

### **REPORTING OPERATIONS VERSUS REGULATED OPERATIONS**

Under the GGIRCA, industrial operations can be *reporting operations* with a reporting obligation, and a subset of these can be *regulated operations* with a *compliance obligation*. All regulated operations are also reporting operations, yet not all reporting operations are regulated operations.

#### **Reporting Operations**

Reporting operations are industrial operations that emit 10,000 or more tonnes of  $CO_2e$  in *attributable emissions* in a calendar year and must report their emissions to ENV. The operator is required to pay the carbon tax on fuel and combustibles. If a reporting operation's emissions fall below 10,000 tonnes  $CO_2e$  per year in subsequent years, they remain a reporting operation until they either cease all activities or remain below 10,000 tonnes  $CO_2e$  per year for three consecutive years.

Certain industry sectors are excluded from the B.C. OBPS but still have reporting requirements under GGIRCA, such as electricity import operations, energy utilities, greenhouse growers, and waste management and remediation services. See Appendix 2 for a list of excluded industry sectors. *Compliance obligation*: The requirement for an operation to emit less than or equal to the emission limit for a compliance period, or else to pay for any excess emissions above the emission limit by making a monetary payment or using a limited number of compliance units.

*Compliance period*: Refers to the calendar year which the operator of a regulated operation has a compliance obligation.

*Attributable emissions*: Emissions that are directly emitted as a result of industrial activities included in the GGERR, such as general <u>stationary combustion.</u>

*Activities*: Actions taken by industrial operators that result in attributable emissions.

#### **Regulated Operations**

Regulated operations are reporting operations that produce, or are designed and constructed to produce, a regulated product and must participate in the B.C. OBPS. Regulated operations have a *compliance obligation* to emit less than their annual emissions limit, or else pay for any excess emissions above their annual emission limit.

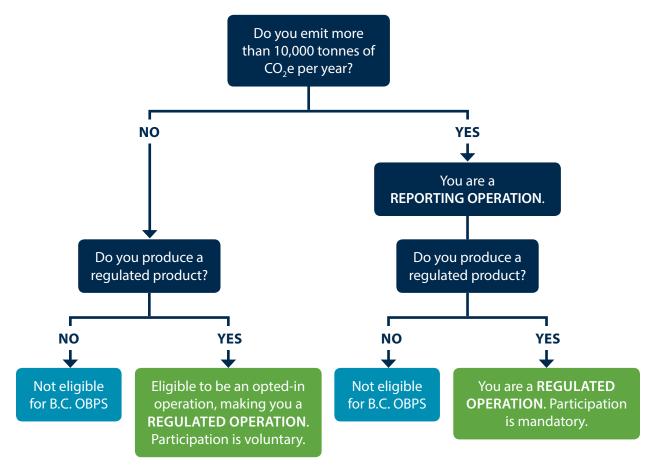
Regulated operations are exempt from paying carbon tax on fuel and combustibles they use or burn at a regulated operation to produce an eligible product and where emissions are attributable for compliance purposes under the OBPS. Exemptions are administered by the Ministry of Finance.

### **Categories of Reporting Operations**

Reporting operations include the following categories:

**Single Facility Operation (SFO)** is a reporting operation where specified industrial activities are carried out at a single facility by an operator. For example, a mine or a pulp mill.

**Linear Facilities Operation (LFO)** is a reporting operation where oil and gas activities are carried out at one or more (typically smaller) facilities that are controlled and directed by the same *operator*. For reporting purposes, LFOs are further disaggregated into categories. Additional information can be found in Part 5.



#### Figure 1. Are you eligible for the B.C. OBPS?

### **Opted-In Operations**

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Industrial operations within a regulated sector that emit less than 10,000 tonnes of CO<sub>2</sub>e per year may apply to the Director of GGIRCA to be designated as an opted-in operation in the B.C. OBPS. Through the B.C. OBPS opt-in policy, lower-emitting industrial operations will be able to access the same competitiveness supports as larger, regulated emitters in their sector. Opted-in operations may claim an exemption from paying carbon tax on their qualifying facility-use fuels and combustibles. They must meet the same reporting and verification requirements of a regulated operation, including annual preparation of a verified compliance report.

Operators must confirm in their application that they meet the eligibility requirements and are able to fulfill the obligations of a regulated operation. More information on the process to apply to be an opted-in operation can be found in Part 7 of this document and Part 5.1 of the GGERR. If you are considering whether to apply and would like more information, please contact us at <u>GHGRegulator@gov.bc.ca</u>.

#### **Opting Out of B.C. OBPS**

Opted-in operations may apply to opt-out of the program. An application to opt-out must be submitted to the Director of GGIRCA on or before August 1 of the compliance period prior to the year in which the operator would like the designation to be revoked. An opted-in operation may not have its designation revoked partway through a compliance period.

#### **New Entrants**

Reporting operations that produce, or are designed and constructed to produce, regulated products may apply to the Director of GGIRCA for a new entrant designation. If accepted, new entrants will have the same reporting and verification obligations as other regulated operations under the B.C. OBPS but will not owe for any excess emissions, nor earn any credits, during their new entrant period.

#### **New Entrant Eligibility**

An industrial operation must satisfy the following criteria to apply for a new entrant designation:

- Be a newly constructed industrial operation. This does not include parts, additions, or expansions to an existing industrial operation;
- Is a reporting operation that is, or is expected to become, a regulated operation;
- Has registered as a reporting operation in the manner specified by the Director of GGIRCA;
- Has a date of first shipment on or after January 1, 2022; and
- Is not an opted-in operation.

#### **New Entrant Period**

If a new entrant's date of first shipment is on or before March 31, 2024, their new entrant period begins on April 1, 2024. The new entrant period then ends two full calendar years after the year in which their date of first shipment occurred.

If a new entrant's date of first shipment is on or after April 1, 2024, they have flexibility in terms of when their new entrant period begins and can select a date on or after their authorization date, but on or before their date of first shipment. Their new entrant period is two full compliance periods plus the remainder of the year in which the new entrant period began.

## PART 3 Stringency

### STRINGENCY METHODOLOGY

Provincial production and emissions data reported to the Province over three years of CIIP, from 2019-2021, were used to calculate provincial production weighted average emissions intensities (PWAEIs) for each regulated product. Emission limits are representative of the average emissions intensity of regulated products, as described below.

### **EMISSION LIMITS**

In the B.C. OBPS, each regulated operation's emissions are assessed against an operationspecific *emission limit*. Regulated operations have a *compliance obligation* to emit less than their annual emission limit, or else pay for any excess emissions above said limit. Regulated operations that emit below their emission limit earn credits that may be traded or used to meet a future compliance obligation.

To determine each operation's emission limit, the following basic principle is applied to each product:

#### Emission limit per product = Annual Production \* Reduction Factor \* Production Weighted Average Emissions Intensity

An operation's annual emission limit is the sum of the emission limits for each regulated product. More information about calculating an annual emission limit can be found in Part 5 of this document. *Emission limit*: For one-product operations, the regulated operation's annual production multiplied by the appropriate reduction factor and its production-weighted average emissions intensity. For multi-product operations, it means the sum of emission limits for each regulated product for the operation.

*Annual Production*: Amount of product generated during the year.

*Reduction Factor*: Determines the percentage of priced emissions for a specific product.

*Production Weighted Average Emissions Intensity*: Calculated as the total emissions of the product divided by the total production amount of the product.

### **REDUCTION FACTORS**

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The Province developed distinct reduction factors for products in the B.C. OBPS with disproportionately higher industrial process emissions than those produced in other sectors. Industrial process emissions result from chemical reactions that are necessary to create certain products, such as cement, chemical processing, and other products. Process emissions are challenging to decarbonize or abate because they are prohibitively costly or impossible to reduce with available technology.

B.C. OPBS reduction factors are listed below:

65% for most products, except those with an explicit 80%, 85%, 90%, and 95% reduction factor;
80% for copper mining;
85% for lead-zinc smelting;
90% for cement, chemical processing, and lime products; and
95% for aluminum smelting.

### **TIGHTENING RATES**

Tightening rates are planned, yearly, gradual increases to B.C. OBPS stringency. The B.C. OBPS tightening rate is set at 1 percent on all emissions for all products except for industrial process emissions. The tightening rate for industrial process emissions is set at 0 percent for all sectors.

Parameter	Sector	NAICS code	Rate
Initial Reduction Factor	Aluminum	331313	95%
	Cement, Chemicals, Lime	327310, 325189, 327410	90%
	Lead-Zinc	331410	85%
	Copper Mining	212233	80%
	Other sectors		65%
Tightening Rate			1%
Tightening Rate – Industrial process emissions <sup>1</sup>			0%
Offset Expiry Limit <sup>2</sup>			3 years
Credit <sup>3</sup> Usage Limit	2024		50%
(portion of compliance obligation)	2025		40%
	2026	30%	
	2027		30%
	2028		30%
	2029		
	2030		30%

#### Table 1: B.C. OBPS Stringency Details

<sup>1</sup> Process emissions are from chemical reactions necessary to create certain products such as aluminum, cement, and lime. Process emissions are difficult to decarbonize or abate.

<sup>2</sup> The offsets themselves do not expire, only their eligibility for use in the B.C. OBPS.

<sup>3</sup> 'Credit' refers to compliance units, including both B.C. offset units and B.C. OBPS earned credits. Offset units represent one tonne equivalent of carbon dioxide removed or reduced from the atmosphere through approved projects on the B.C. Carbon Registry, and earned credits are credits that regulated operations earn when their annual emissions are under their emission limit, at a rate of one credit per one tonne of CO<sub>2</sub>e below their emission limit.

## PART 4 Compliance Mechanisms

If a regulated operation has excess emissions in a compliance period, the operator must pay for each tonne of  $CO_2e$  above the emission limit. To pay, operators must make a monetary payment but there are additional methods, called compliance mechanisms, that provide flexibility in how an operator can meet their compliance obligation.

Compliance mechanisms help incentivize additional emission reductions from other operations and voluntary offset project proponents. In each compliance period, all excess emissions must be paid for by monetary payment, unless the option to use a limited number of compliance units is taken.

Compliance unit limits apply to each compliance period and will change over time in accordance with a schedule:

- 2024: a maximum of 50% usage allowed;
- 2025: a maximum of 40% usage allowed;
- 2026-2030: a maximum of 30% usage allowed.

#### **Compliance Units**

*Earned Credits:* Credits that are issued to an operation when their emissions are verified to be below their emission limit. An earned credit can be used to meet future compliance obligations or sold to another operation.

*Offset Units:* Verified units that represent emission reductions and removals generated from approved B.C. carbon offset projects. The amount of offsets that can be used against an operation's compliance obligation will be limited.

#### **Direct Payments**

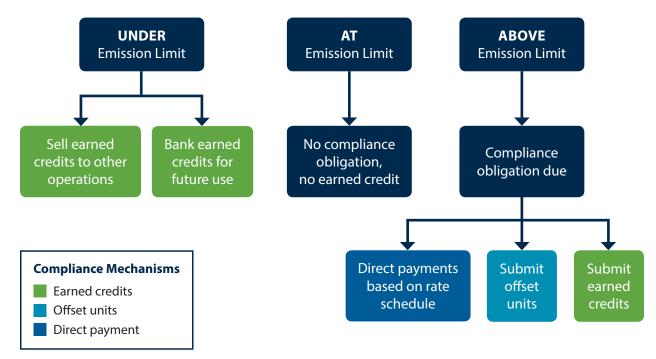
Compliance Charge: A monetary payment to meet the operation's compliance obligations at the full carbon price for that year (for example,  $170/tonne CO_{2}e$  for 2030).

Eligible offset units are limited to those vintages generated within three years of the beginning of the compliance year. Earned credits do not have an expiry date.

In the B.C. OBPS, a B.C. offset unit with a vintage within three years prior to a compliance period and an earned credit always equals one tonne of  $CO_2e$ . For a monetary payment, the cost of one tonne  $CO_2e$  depends on the compliance period in which it was emitted, with a schedule of rates found below.

Calendar year	Compliance Charge Rate per tonnes CO <sub>2</sub> e	
2024	\$80	
2025	\$95	
2026	\$110	
2027	\$125	
2028	\$140	
2029	\$155	
2030	\$170	

#### Table 2. Compliance Charge Rates 2024-2030



### Figure 2. Compliance Mechanisms in a B.C. OBPS

## PART 5 Emission Coverage and Reporting Requirements

### HOW TO CALCULATE AN EMISSION LIMIT

A regulated operation's emission limit is determined by combining the emission limits for each regulated product. For each regulated product, the amount produced by a regulated operation is multiplied by that product's PWAEI and by the annual reduction factor as modified by the cumulative tightening rate for the portion of product-allocated emissions that are not industrial process emissions. The sum of the results for all the regulated operation's regulated products is the operation's annual emission limit for that compliance period. A regulated operation's emission limit for a given year is calculated as follows:

#### Annual Emission $Limit_y =$

$$\sum_{p=1}^{n_{p}} \left\{ \left( \Pr_{y,p} \times PWAEI_{p} \right) \times \left[ RF - \left( 1 - \frac{IPE_{y,p}}{CE_{y,p}} \right) \times TR \times (y - y_{i}) \right] \right\}$$

Where:

- p is a regulated product;
- n<sub>p</sub> is the total number of regulated products p produced by the regulated operation;
- Pr<sub>vp</sub> is the production of product p during compliance year y in units of product p;
- PWAEl<sub>p</sub> is the production-weighted average emission intensity of product p in tCO<sub>2</sub>e/unit of product p;
- RF is the sectoral reduction factor;
- IPE<sub>y,p</sub> are the industrial process emissions at the regulated operation during the compliance period y, allocated to product p;
- CE<sub>y,p</sub> are the compliance emissions at the regulated operation during the compliance year y, allocated to product p;
- TR is the annual tightening rate for compliance emissions that are not industrial process emissions;
- y is the compliance period;
- y<sub>i</sub> is 2024, the first compliance year of B.C. OBPS.

### **EMISSION COVERAGE**

Operators of reporting operations need to identify which emissions must be measured, quantified, and reported. The emission attribution framework outlines the emissions and other information that must be submitted, by specific activity, source, and gas type.

Some emissions that are required to be reported under the GGIRCA are not priced under the B.C. OBPS (see Appendices 3 and 4). The following emissions are excluded from a regulated operation's attributable emission total for B.C. OBPS purposes but must be reported:

- All emissions (carbon dioxide, methane, nitrous oxide) from the combustion of excluded biomass fuels;
- All emissions (carbon dioxide, methane, nitrous oxide) from the combustion of excluded non-biomass fuels;
- Fugitive emissions;
- Venting emissions that are not among the 'useful venting emission sources' listed in the sectorspecific guidance of the oil and gas sector (in other words, non-useful venting emissions);
- Emissions associated with non-compression and non-processing activities in the oil and gas sector; and
- Emissions associated with line tracing in the petroleum refineries sector.

### NEW REPORTING REQUIREMENTS UNDER B.C. OBPS

B.C. OBPS introduces slight changes to reporting requirements for GHG emissions and introduces new reporting requirements related to production. Under GGIRCA, emissions are attributable for different purposes (see Appendix 1):

- i) Emissions that are attributable for reporting purposes, and these include emissions associated with flaring, general stationary combustion, industrial processes, on-site transportation, waste and wastewater, useful and non-useful venting, and fugitives. This applies to both reporting operations that are regulated operations and those that are not regulated operations.
- ii) Emissions that are attributable for compliance purposes, and these include all emissions attributable for reporting purposes, other than reporting-only emissions (outlined in "Emissions Coverage" section above). This only applies to reporting operations that are also regulated operations.

More detailed information about filing reports and timing can be found in Part 6 below.

### Disaggregation of Reporting for Linear Facilities Operations (Oil and Gas)

LFOs are required to disaggregate emissions, fuel usage, production, and other information in different report types which are summarized below:

- Large Facility a report for each individual facility that emits 10,000 tonnes of CO<sub>2</sub>e or more per year.
- Medium Facility a report for each individual facility that emits between 1,000 and 10,000 tonnes of CO<sub>2</sub>e per year.
- Small Aggregate one aggregate report for all individual facilities that emit less than 1,000 tonnes of CO<sub>2</sub>e per year.

Large and Medium Facility reports require information to be specified at the facility level, while the Small Aggregate report is specified at an operation level. Some information that is required for a Large Facility or Medium Facility report is not required for the Small Aggregate report and more can be found in sector-specific guidance.

Operator **Operation Level** SEO LFO Large Medium Small **Facility Level** Facility Facility Aggregate Product A Product B **Product A** Product A Product A **Reporting Level** Product **B** Product B Product B Legend

#### Figure 3. Types of Operations and their Reporting Level

Large Facility: >= 10,000 t CO<sub>2</sub>e Medium Facility: >=1,000 t to10,000 t CO<sub>2</sub>e Small Aggregate: < 1000 t CO<sub>2</sub>e

## PART 6 Reports, Timing, and Verification

### **EMISSION REPORTS**

Operators of reporting operations must submit an annual emission report. The regulation includes a detailed list of activities (associated with industrial production, manufacturing, processing, and refining) and emission source types (associated with these activities) that result in GHG emissions that must be reported. Emission quantification methodologies are prescribed for each activity.

Emission reports are due on May 31 of the year following the compliance period.

### **COMPLIANCE REPORTS**

Operators of regulated operations must submit a compliance report annually. The compliance report must be prepared alongside the emission report for the compliance period, and includes any additional information needed to assess whether a regulated operation has met its compliance obligation.

The compliance report includes information such as the annual production for the operation, and if there are multiple products, will detail the allocation

#### **Important Dates**

*May 31 of year following compliance period*: Emission and Compliance Reports due

November 30 of year following compliance period: 2<sup>nd</sup> Compliance Report due for operations found to have excess emissions.

of emissions by product. Production and other required information must be reported in accordance with sector-specific guidance documents published by the Director of GGIRCA. Compliance reports must be verified by a third-party verification body.

If a verified compliance report indicates that a regulated operation has generated earned credits, the Director of GGIRCA will issue an amount of compliance units to a holding account of the operator on the B.C. Carbon Registry. As part of a compliance review process, operators may be required to correct errors or omissions in the compliance report prior to issuance. Compliance reports are due May 31 of the year following the compliance period.

Verified compliance reports help an operator know whether it is below or over its emission limit. If excess emissions are indicated, the operator will decide whether they will use some amount of eligible compliance units in addition to the required monetary payment. After trading for or identifying eligible compliance units, the operator will transfer these units on the B.C. Carbon Registry to a compliance account for the operator can then pay for the balance of excess emissions by monetary payment.

The operator completes the process by submitting a second compliance report to ENV that details how it met its obligation, including the serial numbers of the compliance units it has made available in its compliance account and a record of the monetary payment. This report is due November 30.

### VERIFICATION

All B.C. OBPS participants, including opted-in operations, must ensure that their emission and compliance reports are verified annually by an accredited verification body. Verification bodies are third-party auditors that are regulated in accordance with international standards (e.g., ISO 14065).

In B.C., verification bodies are accredited by either the ANSI National Accreditation Board (ANAB) or the Standards Council of Canada (SCC). Lists of accredited verification bodies that can work in B.C. are available on the <u>ANAB</u> or <u>SCC</u> websites.

Verification bodies conduct a detailed compliance assessment of an emission report or a compliance report and help ensure that emissions and production data are reported accurately, consistently, and in accordance with regulations. Verification provides reasonable assurance to government that reports are reliable and can support operators to gain insight on how they can improve their operations.

B.C. OBPS participants should plan and prepare early for verification. The process involves a detailed review of many different types of records that have been compiled during the entire reporting period and one or more site visits.

Types of records that may be reviewed include inventory records, sales and/or purchase records, onsite and offsite delivery records, fuel measurement records, records or logs of equipment use, and any other information that provide financial or direct measurement information about the emissions, product, and energy data reported.

Verification bodies must conduct at least one site visit to the regulated operation as part of the process. Additionally, site visits are required for each individual facility in a linear facilities operation that emits over 10,000 tonnes of  $CO_2e$ . Site visits may be conducted in-person or virtually in accordance with the regulations.

### **ERRORS AND CORRECTIONS**

Most errors will be caught and corrected during the verification process and before you submit your reports. Some errors, however, will be discovered by the Ministry during a compliance review or inspection after submission.

Compliance reports that contain material errors or omissions must be corrected in a supplementary report within 90 days of the date the operator becomes aware of them. Material errors are defined in the regulations. Staff will work to document the errors and communicate them to the operator to ensure they can act on that information. If required by the regulations or by the Director of GGIRCA, the operator must correct the report and have the corrections verified.

While the Ministry will work with operators to achieve compliance, there may be situations in which the Director of GGIRCA determines a penalty is necessary. Penalties under the GGIRCA can apply in cases where reports do not comply with the regulations, as well as in other instances of noncompliance. Ministry staff will communicate with operators to answer questions and promote compliance with the GGIRCA as much as possible.

In addition to penalties imposed by the Director of GGIRCA, late penalties automatically apply in cases where an operator fails to meet its compliance obligation by the deadline. Automatic late penalties increase until the compliance obligation is met. The Director will not have the power to prevent, delay, or decrease an automatic penalty.

## **PART 7** | Registration

Below are step-by-step instructions on how to register for the B.C. OBPS for eligible operations. **Please note that the registration process involves several steps that may take additional time outside of the web application**. Some of the steps could take anywhere between several days (e.g., activating a profile in the system, getting the Statutory Declaration notarized) to several weeks (e.g., obtaining a Business BCeID).

### STEP 1: OBTAINING A BUSINESS BCeID

All operators must have a Business BCeID prior to registering for the B.C. OBPS and claiming the carbon tax exemption for regulated operations. A Business BCeID provides secure access to online government services and is necessary to participate in the B.C. OBPS.

The Business BCeID must be associated with the legal business name of the operator. To check if your operator has a Business BCeID, search the **BCeID Business Directory**.

If the operator does not have a Business BCeID, ENV strongly encourages operators to apply for one as soon as possible due to lengthy application processing times. It is not uncommon to take three to five weeks for a Business BCeID to be provided following application. Registering for a Business BCeID is a 5-step process and applications can be submitted year-round. Instructions and support for obtaining a Business BCeID can be accessed at the <u>BCeID website</u>.

If issues arise during the BCeID application process, please reach out to the <u>BCeID team</u> directly with any technical issues.

#### Terms from the BCIERS 'My Operator' page

Administrator Access: A user role within BCIERS (see next page). An Operation Representative with Administrator Access is able to approve other Operation Representatives to access the system and act on behalf of the Operator.

**Operation Representative**: The person who is authorized in writing to act on behalf of the Operator, manage the Operator profile on the platform, and submit the signed application for a BORO ID in BCIERS.

Business Legal Name: The registered legal name, and a unique identifier, for the business that can be found through <u>OrgBook BC</u> or <u>Canada's Business Registries</u>.

**BC Corporate Registry Number**: A unique identifier assigned to a registered business or corporation by the provincial government. This number is used for official documentation, filings, and communication with government authorities, helping to distinguish and track individual businesses within the BC corporate registry.

#### Canada Revenue Agency (CRA) Business

Number: A nine-digit registration number issued by the CRA to Canadian businesses that register for one or more of the following: i) Corporate income tax; ii) Importer/exporter account number; iii) Payroll (source) deductions (trust accounts); iv) or Goods and Services tax.

### **STEP 2: APPLYING ONLINE**

Operators of regulated operations must apply for a B.C. OBPS Regulated Operation ID (BORO ID) for each of their operations through the B.C. Industrial Emissions Reporting System (BCIERS), even if controlled by the same operator. BORO IDs are issued by the Director of GGIRCA and identify industrial operations that are prescribed as regulated operations. For clarity, one BORO ID will be issued to each SFO and LFO.

Keep this document open as you navigate through the BCIERS for ease of reference. In the blue box to the right, you will find definitions for most fields in the BORO ID application. Please note that getting started on BCIERS and applying for a BORO ID is a multi-step process requiring varying process times.

If you have any questions or need support in completing your application, please contact us at <u>GHGRegulator@gov.bc.ca</u>

#### Instructions on How to Activate Your Profile on the B.C. Industrial Emissions Reporting System (BCIERS)

- Access the B.C. Industrial Emissions Reporting System (BCIERS) by logging in using your Business BCeID.
- 2. Identify the operator that you represent and apply for Director of GGIRCA approval to submit the BORO ID application on behalf of the operator. In this step, we are confirming your relationship with the operator. Start by verifying and updating your information as the *Operation Representative*.
  - Press the 'Select Operator' module and search for your operator by either Business Legal Name or Canada Revenue Agency (CRA) Business Number, then press 'Select Operator'.

#### Terms from the BCIERS 'My Operator' page

**Business Mailing Address**: The business mailing address where written communication related to the administration of GGERR should be sent, including the street address, city or municipality, province, country, and postal code.

**Parent Company**: A corporation of which the Operator is a subsidiary.

**Physical Mailing Address**: A physical mailing address is the location where an entity, like a residence or office, is situated. A business mailing address is specific to a business entity, used for official correspondence, and may differ from the operational address.

**Postal Code**: Postal code of the head office of the Operator.

**Province**: Province of the head office of the Operator.

**Trade Name**: A trade name is the official name under which a business operates, aiding in identification and branding. It is distinct from the legal name and plays a key role in marketing and consumer perception.

**Website**: A uniform resource locator (URL) on the world wide web to the landing page of the operator's website.

Business Legal Name: The registered legal name, and a unique indentifier, for the business that can be found through OrgBook BC or Canada's Business Registries.

**BC Corporate Registry Number**: A unique identifier assigned to a registered business or corporation by the provincial government. This number is used for official documentation, filings, and communication with government authorities, helping to distinguish and track individual businesses within the BC corporate registry.

- If information about your operator <u>does</u> <u>not</u> already exist in our system, select 'Add Operator' below the search bar.
  - You will be asked to **enter** the required information on the '**Operator Information**' page. Once you press submit, your first request to add your operator and become its Operation Representative will go to the Ministry of Environment for review and approval.
  - Please allow 3-5 business days to process this request. Users will be notified if more information is required or if it has been approved.
- If information about your operator <u>does</u> exist in our system, you will be asked to **confirm** that the operator you have selected is correct by pressing **'Yes this is my Operator**'.
  - If your operator does not have an Operation Representative with Administrator access in our records, you will be prompted to request this from ENV. Administrator access allows a user to approve access requests from other Operation Representatives. All Operation Representatives will have Administrator access and the ability to approve subsequent access requests on behalf of the Operator.
  - Please allow 3-5 business days to process this request. Users will be notified if more information is required or if it has been approved.
- **3.** Once your request has been approved, and your user profile is activated, you will gain access to a dashboard.
  - Once ENV has approved your Operation Representative with Administrator access, you will be able to apply for a BORO ID and approve other users in your organization in the BCIERS web application.

#### Terms from the BCIERS 'My Operator' page

#### Canada Revenue Agency (CRA) Business

Number: A nine-digit registration number issued by the CRA to Canadian businesses that register for one or more of the following: i) Corporate income tax; ii) Importer/exporter account number; iii) Payroll (source) deductions (trust accounts); iv) or Goods and Services tax.

**Business Mailing Address**: The business mailing address where written communication related to the administration of GGERR should be sent, including the street address, city or municipality, province, country, and postal code.

**Business Structure**: Refers to the business structure of the operator (e.g., partnership, sole proprietorship, corporation, limited liability company).

**Email Address**: An institutional electronic address of the operation representative where digital communication for the purposes of this application should be sent.

**Municipality**: Municipality of the head office of the Operator.

**Parent Company**: A corporation of which the Operator is a subsidiary.

**Physical Mailing Address**: A physical mailing address is the location where an entity, like a residence or office, is situated. A business mailing address is specific to a business entity, used for official correspondence, and may differ from the operational address.

**Postal Code**: Postal code of the head office of the Operator.

**Province**: Province of the head office of the Operator.

- Upon logging in, you should now see a dashboard with 'My Operator', 'My Operations', and 'Users' modules.
- The 'My Operator' module allows you to view or update information about your Operator, and includes fields such as legal name, CRA business number, address, etc.
- The 'My Operations' module will list all the operations as they are currently registered in our database based on previously submitted information. The operations are listed along with their BC GHG ID.
  - If an operation is not listed, you can add an operation.
- The 'Users' module allows you to manage the users that can have access to your Operator profile.

### Instructions to Apply for a B.C. OBPS Regulated Operation ID (BORO ID)

- 1. Submit a BORO ID application for each operation:
  - From the dashboard, click on the 'My Operations' tab to create and view a list of operations that need a BORO ID. Press 'Start Application' to begin your application.
  - This will open the 'Operation Information' page, which will prompt you to provide some information about your operation. Once complete, press 'Next'.
  - If you would like to designate another individual from your organization to be a point of contact for the status of your BORO ID application, then select '**yes**' on the '**Point of Contact'** page and provide their contact information.
  - Confirm your understanding and agreement with the disclaimer and upload a notarized statutory declaration as a PDF document. Then, press submit on your BORO ID application.

#### Terms from the BCIERS 'My Operator' page

**Trade Name**: A trade name is the official name under which a business operates, aiding in identification and branding. It is distinct from the legal name and plays a key role in marketing and consumer perception.

**Website**: A uniform resource locator (URL) on the world wide web to the landing page of the operator's website.

**Operation Name**: The name of the operation. If the operator has submitted emissions reports under GGERR for this operation, please keep using the same name.

**Operation Type**: Whether the operation is a single facility operation (SFO) or a linear facilities operation (LFO).

**Primary NAICS Code**: The six-digit numerical code applicable to the main economic activity of an operation under the North American Industry Classification System <u>published by Statistics</u> <u>Canada</u>, as amended from time to time.

**NAICS Category**: The Canadian industry title applicable to the main economic activity of an operation under the North American Industry Classification System <u>published by Statistics</u> <u>Canada</u>, as amended from time to time.

**Regulated Product**: The name of one or several products produced at the operation and listed in column 2 of Table 2 of Schedule A.1 in GGERR.

**BC GHG ID**: The ten-digit identification number of the operation assigned when registered for GHG reporting purposes by the Director under GGIRCA.

**Opted-in Operation**: An industrial operation, within a regulated sector, that emits less than  $10,000 \text{ tCO}_2\text{e}$  per year and voluntarily chooses to participate in the B.C. OBPS and is designated by the Director under GGIRCA.

- **2.** The Director of GGIRCA will review and your application for a BORO ID:
  - Please allow 3-5 business days for the application to be processed. If changes and corrections are required to your application, processing times may vary and could take an additional two weeks. If you need support, please contact us at <u>GHGRegulator@gov.bc.ca</u> and someone will contact you within 2 business days.
  - Once approved, a BORO ID will be assigned to each Operation.
  - After obtaining a BORO ID, you will need to follow a separate process specified by the Ministry of Finance to claim a carbon tax exemption.

#### Terms from the BCIERS 'My Operator' page

**Point of Contact**: In BCIERS, this is a person who will become the primary point of contact when changes are requested for a BORO ID Application. If no application lead is selected, the Operation Representative will be this primary point of contact.

#### Signed Statutory Declaration: A

written statement signed by an Operation Representative acknowledging control of the Operator over the operation(s), understanding of legislative and regulatory obligations, and the accuracy and veracity of all information provided. It also authorizes ENV to handle and verify this information for the purpose of issuing a BORO ID. The declaration is a legal document and should be sworn before someone who is authorized to administer oaths.

### **REGISTRATION PROCESS FOR OPTED-IN OPERATIONS**

To apply to have an industrial operation designated as an opted-in operation, applicants need to first complete the above registration process for a BORO ID. Additionally, the Operator needs to submit an additional opt-in **Application Form** signed by an Operation Representative. You can find opt-in application instructions and the Application Form on the <u>B.C. OBPS website</u>.

The opt-in application form must be submitted to <u>GHGRegulator@gov.bc.ca</u>. Operations applying to be an opted-in operation will not receive a BORO ID until this additional application form has been received and approved by the Director of GGIRCA. Please note that the opt-in Application Form will also require notarization.

## Glossary

Activities: Actions taken by industrial operators that result in attributable emissions.

Annual Production: Amount of product generated during the year.

**Attributable Emissions**: Emissions that are directly emitted as a result of industrial activities included in the GGERR, such as general stationary combustion.

Authorization Date: In relation to an industrial operation, means:

- a) If, after construction of the operation, the operation is not authorized to begin operations without receiving an authorization, including a permit or an approval, under an enactment or a municipal or regional district bylaw, the first date on which the operation receives all provincial, municipal, and regional district authorizations to begin operations, and
- b) If paragraph a) doesn't apply, the first day of operations after construction of the operation is completed.

**Administrator Access:** A user role within BCIERS. An Operation Representative with Administrator Access is able to approve other Operation Representatives to access the system and act on behalf of the Operator.

**Business Legal Name**: A field in B.C. Industrial Emissions Reporting System (BCIERS) that requires the legal name of the corporation. To find the business legal name of an organization, use the search function in <u>OrgBook BC</u> or <u>Canada's Business Registries</u>.

**BC Corporate Registry Number:** A unique identifier assigned to a registered business or corporation by the provincial government. This number is used for official documentation, filings, and communication with government authorities, helping to distinguish and track individual businesses within the BC corporate registry. This is a required field in BCIERS.

**BC GHG ID**: The ten-digit identification number of the operation assigned when registered for GHG reporting purposes by the Director of GGIRCA. This will be viewable in BCIERS.

**Business Mailing Address:** The business mailing address where written communication related to the administration of GGERR should be sent, including the street address, city or municipality, province, country, and postal code. This is a required field in BCIERS.

**Business Structure:** Refers to the business structure of the operator (e.g., partnership, sole proprietorship, corporation, limited liability company). This is a required field in BCIERS.

**Canada Revenue Agency (CRA) Business Number:** A nine-digit registration number issued by the CRA to Canadian businesses that register for one or more of the following: i) Corporate income tax; ii) Importer/ exporter account number; iii) Payroll (source) deductions (trust accounts); iv) or Goods and Services tax. A CRA Business Number may be used to search for an operation in BCIERS.

**Compliance Obligation**: The requirement for an operation to emit less than or equal to the emission limit for a compliance period, or else to pay for any excess emissions above the emission limit by making a monetary payment or using a limited number of compliance units.

**Compliance Period:** Refers to the calendar year which the operator of a regulated operation has a compliance obligation.

**Compliance Reports:** Mandatory annual reports that confirm a regulated operation's compliance in the OBPS. There are two types of compliance reports:

- i) A compliance report that includes emissions, production, and any other information needed to assess whether their compliance obligation was met, and
- ii) If the operation had excess emissions, a second compliance report showing how the compliance obligation was met.

**Date of First Shipment:** Date on which an industrial operation transports its first shipment of a regulated product from the operation for delivery:

- a) To a commercial purchaser of the product for consumption or resale,
- b) To another regulated operation that is to refine or otherwise add commercial value to the product, or,
- c) Outside of British Columbia.

**Designated Operator**: Refers to a person that is selected or named, out of multiple operators, to represent an industrial operation.

**Emission Limit**: For one-product operations, the regulated operation's annual production multiplied by the appropriate reduction factor and its production-weighted average emissions intensity. For multiproduct operations, it means the sum of emission limits for each regulated product for the operation.

Facility: Includes all buildings, structures, stationary items, and equipment that:

- i) Are located or used primarily on a single site, contiguous sites, or adjacent sites,
- ii) Are controlled and directed by the same person, and
- iii) Function as a single integrated site. Includes wastewater collection and treatment systems, storage of petroleum or natural gas products at a terminal, and mobile equipment that is primarily at the site.

Individual Facility: Refers to an individual facility within a linear facilities operation.

**Industrial Operation:** One or more facilities, or a prescribed activity, to which greenhouse gas emissions are attributable.

**Linear Facilities Operation (LFO):** Is a reporting operation where oil and gas activities are carried out at one or more (typically smaller) facilities that are controlled and directed by the same operator. For example, multiple well sites or a pipeline.

**Municipality:** Municipality of the head office of the Operator. This is a required field in BCIERS.

**NAICS Code:** Means the numerical code applicable to one or more producing units within a reporting operation under the North American Industry Classification System published by Statistics Canada, as amended from time to time. This is a required field in BCIERS.

**New Entrant:** A designation for a newly constructed regulated operation whose date of first shipment is on or after January 1, 2022, and who does not owe for excess emissions, nor earn credits, for the duration of its new entrant period.

**OBPS Facility**: Means a regulated operation or a part of a regulated operation submitting a separate compliance report, which is one of the following:

i) A single facility operation (SFO);

ii) An individual facility within a LFO which emits  $\geq 10,000$  tonnes of CO<sub>2</sub>e;

iii) An individual facility within a LFO which emits >= 1,000 tonnes of CO<sub>2</sub>e and < 10,000 tonnes of CO<sub>2</sub>e

iv) The aggregate of all individual facilities within an LFO emitting <1,000 t CO<sub>2</sub>e each

**Operation Name**: The name of the operation. If the operator has submitted emissions reports under GGERR for this operation, please keep using the same name. This is a required field in BCIERS.

**Operation Representative:** The person who is authorized in writing to act on behalf of the Operator, manage the Operator profile on the platform, and submit the signed application for a BORO ID in BCIERS.

**Operation Type:** Whether the operation is a single facility operation (SFO) or a linear facilities operation (LFO). This is a required field in BCIERS.

**Operator**: The person who owns and/or controls and directs the industrial operation.

**Opted-in Operation:** An industrial operation, within a regulated sector, that emits less than 10,000 tCO<sub>2</sub>e per year and voluntarily chooses to participate in the B.C. OBPS and is designated by the Director under GGIRCA.

**Parent Company**: A corporation of which the Operator is a subsidiary. Information about parent company(s) may be entered into BCIERS.

**Physical Mailing Address:** A physical mailing address is the location where an entity, like a residence or office, is situated. A business mailing address is specific to a business entity, used for official correspondence, and may differ from the operational address. This is a required field in BCIERS.

**Point of Contact:** In BCIERS, this is a person who will become the primary point of contact when changes are requested for a BORO ID Application. If no application lead is selected, the Operation Representative will be this primary point of contact.

Postal Code: Postal code of the head office of the Operator. This is a required field in BCIERS.

Production: The amount of regulated product produced during a compliance period in the correct units.

**Production-Weighted Average Emission Intensity:** Means, for a product, the published B.C. production-weighted average emission intensity (PWAEI) for that product found in Schedule A.1 of the GGERR.

**Province**: Province of the head office of the Operator. This is a required field in BCIERS.

**Reduction Factor:** Determines the percentage of priced emissions for a specific product.

**Regulated Operation:** Regulated operations are reporting operations that produce, or are designed and constructed to produce, a regulated product and must participate in the B.C. OBPS. Regulated operations have a compliance obligation to emit less than their annual emissions limit, or else pay for any excess emissions above their annual emission limit.

**Opted-In Operation**: An industrial operation that produces a regulated product and emits less than 10,000 tonnes of  $CO_2e$  annually that voluntarily participates in the B.C. OBPS.

**Regulated Product:** A product as defined by the B.C. OBPS and published in Schedule A.1, Table 2, column 2 in GGERR or in Appendix 1.

**Reporting Operation:** Industrial operations that emit 10,000 or more tonnes of  $CO_2e$  in attributable emissions under section 3 of GGERR in a calendar year and must report their emissions to ENV.

**Single Facility Operation (SFO):** Is a reporting operation where specified industrial activities are carried out at a single facility by an operator. For example, a mine or a pulp mill.

**Signed Statutory Declaration:** A written statement signed by an Operation Representative and uploaded in BCIERS when applying for a BORO ID. It acknowledges control of the Operator over the operation(s), understanding of legislative and regulatory obligations, and the accuracy and veracity of all information provided. It also authorizes ENV to handle and verify this information for the purpose of issuing a BORO ID. The document is considered to be a legal document and should be sworn before someone who is authorized to administer oaths.

**Senior Officer:** An officer of the corporation, whether or not the officer is also a director of the corporation, who performs a policy-making function in respect of the corporation and who has the capacity to influence the direction of the corporation.

Site: A physical location that includes an industrial operation.

Tonnes of CO<sub>2</sub>e: Tonnes of carbon dioxide equivalent.

**Tightening Rate:** Tightening rates are planned, yearly, gradual increases to B.C. OBPS stringency.

**Trade Name:** A trade name is the official name under which a business operates, aiding in identification and branding. It is distinct from the legal name and plays a key role in marketing and consumer perception. This is a required field in BCIERS.

**Waste:** Unwanted or unusable residual material that is a result of industrial activities. Waste includes wastewater and products that are of a lower grade that are unsalable.

## Appendices

### APPENDIX 1 – CIIP PRODUCTS VERSUS OBPS-REGULATED PRODUCTS

<b>Products</b> The list of products below is in scope for compliance purposes under the B.C. OBPS and subject to change. ENV is currently exploring additional products to consider for inclusion. Note list does not include products for future operations.		
Product Name	CIIP product	B.C. OBPS regulated product
B.Cspecific refinery complexity throughput	Yes	Yes
Cannabis-growing area	Yes	No
Cement equivalent	Yes	Yes
Chemicals: Pure hydrogen peroxide	Yes	Yes
Compression, centrifugal – consumed energy	Yes	Yes
Compression, positive displacement – consumed energy	Yes	Yes
Decontaminated fuel	Yes	No
Delivered heat	Yes	No
Eligible plants-growing area	Yes	No
Emissions from ElOs	No	No
Fat, oil, and grease refining and storage	No	No
Forged steel balls < 3.5 inches	Yes	No
Forged steel balls > 4 inches	Yes	No
Gypsum wallboard	Yes	Yes
Steel wire: HDG-process (hot dip galvanization)	Yes	Yes
Lime at 94.5% CaO and lime kiln dust	Yes	Yes
Limestone for sale	No	Yes
Sugar: Liquid	Yes	Yes
Mining: Coal	Yes	Yes
Mining: Copper equivalent, open pit	Yes	Yes
Mining: Copper equivalent, underground	Yes	Yes
Mining: Gold equivalent	Yes	Yes
Mining: Silver equivalent	Yes	No
Steel wire: Non-HDG	No	Yes
Pulp and Paper: Paper (except newsprint and tissue paper)	Yes	Yes
Processing sour gas – oil equivalent	Yes	Yes
Processing sweet gas – oil equivalent	Yes	Yes
Pulp and Paper: Chemical pulp	Yes	Yes
Pulp and Paper: Non-chemical pulp	Yes	Yes
Purchased electricity	Yes	No

Purchased heat	Yes	No
Rendering and meat processing: protein and fat	Yes	Yes
Smelting: Aluminum	Yes	Yes
Smelting: Lead-zinc	Yes	Yes
Sold electricity	Yes	Yes
Sold Heat	Yes	Yes
Sugar: solid	Yes	Yes
Upstream oil/gas: Other	Yes	No
Wood products: Lumber	Yes	Yes
Wood products: Medium density fibreboard	Yes	Yes
Wood products: Plywood	Yes	Yes
Wood products: Veneer	Yes	Yes
Wood products: Wood chips (including hog fuel)	Yes	Yes
Wood products: Wood pellets	Yes	Yes
Pulp and Paper: Tissue paper	No	Yes
Renewable diesel	No	Yes
Liquefied Natural Gas	No	Yes

# APPENDIX 2 – NAICS INDUSTRY SECTORS EXCLUDED FROM THE B.C. OBPS

NAICS Codes			
NAICS Code	NAICS Sector	GGIRCA/GGERR – Reporting	B.C. OBPS – Compliance
11	Agriculture, forestry, fishing, and hunting	Yes	No
22	Utilities	Yes	No
562	Waste management and remediation services	Yes	No

### APPENDIX 3 – FUEL TYPES EXCLUDED FROM THE B.C. OBPS

Fuel Types			
Fuel Type	GGIRCA/GGERR – Reporting	B.C. OBPS – Compliance	
Woody biomass	Yes	No	
Biodiesel	Yes	No	
Bone char – organics	Yes	No	
Digester gas	Yes	No	
Ethanol	Yes	No	
Landfill gas	Yes	No	
Municipal solid waste – biomass component	Yes	No	
Renewable diesel	Yes	No	
Renewable natural gas	Yes	No	
Solid byproducts	Yes	No	
Acetylene	Yes	No	
Carpet fibre	Yes	No	
E-waste	Yes	No	
Explosives	Yes	No	
Isobutylene	Yes	No	
Lubricants	Yes	No	
Municipal solid waste – non-biomass component	Yes	No	
Trona	Yes	No	
Plastics	Yes	No	
Propylene	Yes	No	
SMR PSA tail gas	Yes	No	
Sodium bicarbonate	Yes	No	

### APPENDIX 4 – EMISSION CATEGORIES

Emission Categories			
Emission Category	GGIRCA/GGERR – Reporting	B.C. OBPS – Compliance	
Flaring	Yes	Yes	
Fugitive	Yes	No	
General Stationary Combustion	Yes	Yes	
Industrial Process	Yes	Yes	
On-Site Transportation	Yes	Yes	
Venting	Yes	(see below)	
Non-Useful venting	Yes	No	
Useful venting	Yes	Yes	
Waste	Yes	Yes	
Wastewater	Yes	Yes	
Useful Venting – Emission Source Type			
Onshore NG Transmission Compression/Pipelines:	NG intermittent devices venting		
Onshore NG Transmission Compression/Pipelines:	NG continuous low bleed devices venti	ng	
Onshore NG Transmission Compression/Pipelines:	NG continuous high bleed devices vent	ing	
Onshore NG Transmission Compression/Pipelines:	NG pneumatic pumps venting		
Onshore Petroleum and NG Production: NG contir	nuous low bleed devices venting		
Onshore Petroleum and NG Production: NG pneur	natic pump venting		
Onshore Petroleum and NG Production: NG contir	nuous high bleed devices venting		
Onshore Petroleum and NG Production: NG intern	nittent devices venting		
LNG Activities: NG continuous low bleed devices v	venting		
LNG Activities: NG pneumatic pump venting			
LNG Activities: NG continuous high bleed devices	venting		
LNG Activities: NG intermittent devices venting			

