

Greenhouse Gas Industrial Reporting and Control Act Bulletin 010

Allowance for conducting site visits virtually as part of the verification process of an emission report and compliance report

Greenhouse Gas Emission Reporting Regulation

Overview

This bulletin provides summary information on recent amendments (OIC#658) to the Greenhouse Gas Emission Reporting Regulation ('the Regulation' or 'GGERR') that:

- Allow verification site visits to be conducted virtually, subject to conditions outlined below.
- Require verification bodies that may conduct virtual site visits to:
 - Determine whether a virtual site visit is allowed; and,
 - Provide additional information in a verification statement.

Reporting operations, regulated operations, verification bodies and accreditation bodies should ensure they understand the new requirements and provide notice of 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 an emission report and a compliance report, a verification body (VB) may conduct a site visit required under ISO 14064-3 and s. 30(2)(d) of the Regulation virtually only if all the following conditions have been met:

- all site visits to the reporting operation for at least one of the two immediately preceding reporting periods were conducted in person by the VB (e.g. if a VB intends to conduct a virtual site visit for an emission report respecting the 2020 reporting period (January 1, 2020 to December 31, 2020), the VB must ensure that it conducted all required site visits to the reporting operation for at least one of the 2018 or 2019 reporting periods in person).
- the VB determines that, since its most recent site visit to the reporting operation that there have been:
 - no significant changes have been made to processes or activities carried out at a facility that is all or part of the operation;
 - no significant physical changes have been made at a facility that is all or part of the operation;
- the VB determines that the process flow diagram for the reporting operation is accurate and reliable for the purposes of the verification;

- the VB determines that a virtual site visit will provide a reasonable level of assurance that the emission report is materially correct; and,
- the Director under GGIRCA has not otherwise required the site visit to be conducted in person.

In accordance with s. 30(6) of the Regulation, the Director under GGIRCA may require that a site visit be conducted in person if the Director considers that:

- an emission report previously submitted to the reporting operation was not prepared in accordance with this Regulation;
- emissions reported in an emission report previously submitted by the reporting operation were not quantified in accordance with this regulation;
- a verification previously performed by the verification body did not comply with this Regulation or the standards of the verifier's accreditation body; and,
- it is otherwise necessary for the site visit to be conducted in person.

Virtual site visits must be conducted in accordance with the Regulation, International Accreditation Forum Mandatory Document for the Use of Information and Communication Technology for Auditing/Assessment Purposes: Issue 2 (IAF MD4:2018), and 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 statement, 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.

Changes to the Verification Statement

The Verification Statement template will change to reflect these amendments to the Regulation and may also change periodically for future reporting periods, based on changing information needs.

In accordance with s. 33(2)(j.1) of the Regulation, verification bodies must ensure they include in the verification statement, identification of:

- information communication technology (ICT) used to carry out each respective site visit conducted virtually;
- any risks identified in accordance with IAF MD4:2018; and
- any mitigation strategies used to address these risks.

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.