

## ***Greenhouse Gas Industrial Reporting and Control Act Bulletin 016***

### **Update: Reporting fugitive methane emissions from open pit coal mining**

*Greenhouse Gas Emission Reporting Regulation (GGERR)*

#### **Overview**

This bulletin provides information to industrial operators that have a reporting obligation under the [Greenhouse Gas Emission Reporting Regulation](#) ('the Regulation' or 'GGERR') on recent amendments (OIC#702) to reporting requirements for fugitive coalbed methane emissions.

This guidance clarifies and replaces the guidance previously set out in Bulletin 008 on this matter.

Operators that report fugitive coalbed methane should ensure they understand the updated 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](mailto:GHGRegulator@gov.bc.ca).

#### **Reporting Emissions**

Prior to the recent amendment, Section 15(2) of the GGERR required that operators quantify fugitive methane emissions from coal when broken or exposed to the atmosphere during mining "in accordance with best industry practices" (as referenced in Schedule A, Table 1, Item 25 Column 5 of the GGERR). On May 25, 2020, the Director under GGIRCA, in consultation with coal operators, published [GGIRCA Bulletin 008](#) identifying the federal government's methodology as best practice. The federal government uses the methodology set out in the National Inventory Report, as specified below. The GGERR has now been amended to formalize the requirement to use this methodology.

#### **Further Detail on Methodology**

Schedule A, Table 1, Item 25, Column 5 of the GGERR has been amended to remove "in accordance with best industry practices" and instead prescribe the methodology noted in [A3.2-2, Annex 3.2 of Part 2 of the National Inventory Report \(NIR\) 2021 Edition](#).

An additional section has been added to Schedule A that states that the following formula must be used to calculate the emissions in relation to open pit coal mining:

$$\text{Emissions} = \Sigma (\text{EF} \times \text{Coal})$$

Where:

EF = the emission factor for the type of coal in the table titled “Fugitive Emission Factors for Coal Mining” for surface mines in British Columbia in the National Inventory Report by Canada to the United Nations Framework Convention on Climate Change that is published

- (a) in the most recent National Inventory Report, and
- (b) before the end of the applicable reporting period.

Coal = the amount of the type of coal extracted

For clarity, “before the end of the applicable reporting period” means that operators should use the appropriate emission factor that is listed in the relevant table for surface mines in British Columbia on December 31 of the reporting period. For example, if the emission factor is updated anytime between January 1, 2022 and the May 31, 2022 reporting deadline, the emission report for the 2021 reporting period should use the emission factor that was listed in the NIR as of December 31, 2021.

### **Applicability**

Emission reports for the 2020 reporting period or earlier that used other industry best practices in accordance with the Regulation are not required to be modified.

### **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.

To view Order in Council No. 702, visit the [BC Laws website](#).