

Greenhouse Gas Industrial Reporting and Control Act Bulletin 017

Reporting and control of on-site mobile fuel combustion emissions and fugitive coalbed methane

Greenhouse Gas Emission Reporting Regulation (GGERR)

Overview

This bulletin provides information to reporting operations and verification bodies under the Greenhouse Gas Emission Reporting Regulation ('the Regulation' or 'GGERR') regarding recent amendments (OIC#702) to requirements for the reporting and control of on-site mobile fuel combustion emissions and fugitive coalbed methane. These amendments support more comprehensive attribution of emissions and improve the alignment of British Columbia's compliance framework with that of other jurisdictions.

Industrial operators and verification bodies should ensure they understand the 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.

Changing the definition of "reporting-only emissions"

The definition of "reporting-only emissions" in section 1(2) of the GGERR has been amended to mean: "carbon dioxide from biomass listed in Schedule C."

Prior to this amendment, emissions from on-site mobile fuel combustion (source type listed in item 2 of Table 1 of Schedule A) and fugitive coalbed methane (source type listed in items 25 of Table 1 of Schedule A) were included in the definition of "reporting-only emissions". These emission types have now been removed from the definition of "reporting-only emissions" in the GGERR. This change means that operators will be required to include emissions from these two source types in circumstances where they were previously excluded.

The amendments impact Sections 4, 18, 27, and 32 of the GGERR as follows:

- Section 4(1)(a): reporting-only emissions are not included in determining the compliance obligations under Section 6 of the Act. Since on-site mobile fuel combustion and fugitive coalbed methane are no longer reporting-only emissions, they must now be included if determining compliance obligations with an emissions limit set under the Act.
- Section 18(3): when assessing inaccuracies, omissions or changes in an emission report, the updated definition of reporting-only emissions will impact whether the errors are found to be material or immaterial, as well as whether a supplementary report will be required.

- Section 27(1): since emissions from on-site mobile fuel combustion and fugitive coalbed methane are now included as attributable emissions, operators may need to have their emissions reports verified if their attributable emissions are greater than or equal to 25,000 tonnes of carbon dioxide equivalent (tCO₂e), not including reporting-only emissions (i.e., carbon dioxide from biomass listed in Schedule C.)
- Section 32: when determining the percent accuracy (PA) of an emissions report, verification bodies must use the equation prescribed under Section 32. Emissions from on-site mobile fuel combustion and fugitive coalbed methane must now be included in the “SOU” and “TRE” variables in this equation.

Reporting operations may require verification for the first time

Please note that some reporting operations may be required to have their 2021 emission report verified for the first time because of this change to the definition of “reporting-only emissions”. Operations with proportionally higher emissions from on-site mobile fuel combustion and fugitive coalbed methane should check whether they are now required to obtain third-party verification on an annual basis.

Applicability

Emission reports prior to the 2021 reporting period that included on-site mobile fuel combustion and fugitive coalbed methane as reporting-only emissions 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](#).