



## Carbon Capture and Sequestration Offset Protocol (CCSP) Consultation What We Heard Report 2025

*Greenhouse Gas Industrial Reporting and Control Act (GGIRCA)*

### Introduction

The Ministry of Energy and Climate Solutions (the Ministry), has wrapped up the second round of consultation on the draft Carbon Capture and Sequestration Offset Protocol (CCSP). The CCSP will incentivize and enable carbon capture and sequestration offset projects in British Columbia (B.C.).

The Ministry issued the first draft of the B.C. CCSP for public consultation in 2023 and released a ['What We Heard Report'](#) in 2024. The Ministry followed up with a second round of public consultation in early 2025 in response to feedback from 2023.

The Ministry thanks all those who submitted written and verbal feedback, participated in meetings, and engaged in presentations with Ministry staff. This report contains a summary of the feedback the Ministry received during the second round of consultation between February 4, 2025, and March 4, 2025.

### Background

This report reflects Stages 5-6 of the protocol development process, as defined in B.C.'s Offset Protocol Policy ([OPP](#)). These stages aim to reflect the feedback received throughout engagement and to strengthen the final protocol.

In alignment with the Ministry's 2025-26 and 2027-28 [Service Plan](#), under Goals 2 and 3, carbon capture is identified as a key strategy in ensuring B.C.'s oil and gas industry reduces its carbon footprint in a manner that supports economic sustainability, advances Indigenous reconciliation, and reduces emissions.

Established under the Greenhouse Gas Industrial Reporting and Control Act (GGIRCA), the CCSP provides eligibility requirements and quantification methodology for emission offset projects that sequester (permanently store) captured carbon. The CCSP must be

read in conjunction with the [Emission Offset Project Regulation](#) (EOPR), which sets regulatory requirements applicable to all emission offset projects.

## **Consultation**

Consultation on a previous draft version of the CCSP took place between September 13, 2023, to December 14, 2023. During this period, the Ministry welcomed feedback and perspectives from First Nations and First Nations organizations, industry, verification and validation bodies, potential project proponents, government stakeholders, and others, to ensure the practical application of the final protocol upon release.

During the 2023 engagement period, the most cited concern was that the length of the monitoring period would be prohibitive to project development. To address these concerns, the Province explored CCSP revisions and other pathways to both enable project development and ensure the permanence of sequestered carbon dioxide. The Ministry prepared a [technical discussion paper \(PDF, 189KB\)](#) which:

- Summarized feedback the Ministry received,
- Explained how the feedback would be incorporated into the final CCSP, and
- Included frequently asked questions.

The 2025 engagement period on the CCSP technical discussion paper began on February 4, 2025 and ended on March 4, 2025, for a total of 30 days. Participants that submitted feedback in the second round of consultation included First Nations and First Nations organizations, industry, and environmental non-governmental organizations (ENGOS). The Ministry evaluated each comment received individually, considering its value and significance.

## **Summary of Feedback**

In total, the Ministry received 12 formal submissions with 83 individual comments (see Table 1) in the 2025 engagement period (second round).

The scope of engagement in the second round focused on proposed monitoring period requirement changes presented in the technical discussion paper. The Ministry notes

that many comments were outside the scope of this engagement. The submissions, individual comments, and key themes are outlined below:

*Table 1: 2025 CCSP Engagement Submissions by Group*

Party	Submissions	Individual Comments
NGOs	4	25
First Nations	7	46
Industry	1	12
Total	12	83

Based on the feedback received, the following 3 key themes were identified:

- Land Use and Project Consultation Requirements
- Monitoring Periods and Leak Detection
- Double Counting and Additionality

### **Land Use and Project Consultation Requirements**

The most common comment from First Nations and First Nations organizations surrounded engagement, recognition of rights and title interests, alignment of CCS projects and related engagement with the Declaration on the Rights of Indigenous Peoples Act (DRIPA), the tenure process and Indigenous decision-making for CCSP projects. Several comments stated that engagement on the CCSP has been insufficient, and that the regulatory process does not provide clear mechanisms for Indigenous decision-making. The Ministry acknowledges receipt of these comments and concerns. The Ministry thanks all First Nations and First Nations organizations for their essential input throughout the development of the CCSP and has provided direct responses where requested.

Since September 2023, there has been an extensive timeline for consultation, engagement, and feedback on the draft CCSP, during which the Ministry has received valuable input that has helped shape the development and the current proposed amendments. The Ministry clarifies that the CCSP is a technical document that provides a protocol for carrying out certain emissions offset projects involving the capture, permanent storage, and quantification of greenhouse gas (GHG) reductions. The CCSP is an emission offset protocol under the GGIRCA and establishes the quantification methodology and eligibility requirements to ensure that any offsets generated by a project are high quality, permanent, real, verifiable, and additional. The CCSP is not a law

that approves carbon storage licenses or land access, nor does it set the requirements for consultation and engagement. An offset protocol enables offset units under GGIRCA, and proponents can sell or trade these offset units.

For subsurface sequestration, the CCSP applies specifically to projects that inject captured carbon into a depleted oil and gas reservoir, deep saline formation, and/or mafic or ultramafic rock formation. In British Columbia, the Northeastern region has the most suitable underground storage sites where CCS projects could occur. Projects under the CCSP must comply with B.C.'s broader regulatory framework, Indigenous consultation and Declaration on the Rights of Indigenous Peoples Act commitments, recognition of First Nations' rights and title interests, and Treaty obligations. Consultation with First Nations is an important aspect of project development, and project proponents are encouraged to engage with impacted First Nations early in the planning stages of a project, prior to the formal consultation process.

Proponents pursuing rights to the subsurface for carbon storage under a storage reservoir exploration licence, storage reservoir licence, or petroleum and natural gas (PNG) lease submit an application for a licence or request to post PNG rights for sale to Ministry of Energy and Climate Solutions staff. Ministry staff then conduct an internal review, which includes determining whether the proposed licence or lease is in an area where new requests for subsurface rights have been suspended to address Indigenous interests and land use issues or to facilitate negotiations and planning between First Nations and the Province, such as land use planning initiatives. If the request passes Ministry internal review, the Ministry consults with potentially impacted First Nations to understand potential impacts to rights and title and discuss any concerns raised and requests for accommodation measures.

The Ministry takes a distinctions-based approach to consulting with potentially impacted First Nations by adapting the consultation process to include requested information, preferred methods of sharing information and timelines outlined in consultation agreements with individual First Nations. At the end of the referral period, the Ministry assesses all comments, accommodation measures, and concerns are assessed to inform the decision regarding the subsurface storage reservoir. This assessment may result in a reconfiguration of the area, in a significant delay to the issuance of the subsurface rights until concerns are addressed, or in denying issuance of the rights.

If the Ministry issues the subsurface rights, the Ministry can include caveats on the licence or lease to disclose information identified during the pre-tenure referral process to inform proponents and the British Columbia Energy Regulator (BCER) of matters that may affect development of the licence or lease. Matters can include potential access restrictions, environmental values, and Indigenous interests and rights. The caveats may include requests or interests raised by a specific First Nation to support proponents in undertaking a distinctions-based approach to pre-engagement, as required by the BCER. The Ministry expects tenure holders to consider and address caveats accordingly prior to requesting surface activities.

The BCER regulates and issues permits and orders under the regulatory framework for all storage reservoir activities. The technical discussion paper proposed the CCSP would establish requirements for all reservoir sites and an additional project-specific variable length monitoring period determined by the BCER. Prior to applying under the CCSP as an offset project, potential individual CCS projects must complete an application process, during which consultation with potential impacted First Nations must occur, that must be reviewed and approved by the Ministry.

After the processes described above are concluded, the proponent may submit a validated offset project plan prepared under the CCSP to the director under GGIRCA in the Ministry for approval. Should the director approve the project plan, the proponent may then submit project reports and request issuance of offset units on the BC Carbon Registry.

The Ministry once again thanks all First Nations and First Nations organizations that submitted feedback during the development of the CCSP. The Ministry is reviewing revisions to the CCSP to speak to consultation with First Nations required in the broader regulatory framework applicable to CCS projects.

### **Monitoring and Leak Detection**

During the first round of engagement on the draft CCSP, the Ministry received 36 formal submissions and 275 individual comments, with a substantial number expressing concern that monitoring and reporting requirements were too long, burdensome, and may impact the economic viability of projects. The Ministry received feedback that although robust monitoring is critical to ensure no physical leakage occurs, the 100-year monitoring requirement to match the 100-year permanence standard regardless of project risk of reversal was prohibitively long and likely to impact the ability of

proponents to make investment decisions in the near-term, as well as deterring project developers due to liability concerns and administration burden to smaller projects.

To address these concerns, the Ministry is applying revisions to the draft CCSP prior to its publication. The Ministry received 17 individual comments concerning monitoring requirements in the second round of engagement. The proposed pathway is to require that the monitoring period length is commensurate with the project-specific risk of the sequestration not being permanent, rather than requiring a predetermined fixed total length of time. The Province previously amended the EOPR to allow the length of the monitoring period and associated monitoring requirements to be determined by the applicable protocol.

Rather than applying a standard 100-year monitoring period, the CCSP will require a monitoring period based on site-specific risk assessment. The revised CCSP will establish requirements for all reservoir sites and additional project-specific variable length monitoring period will be determined by the BCER. The BCER's determination for the total monitoring period length requirement is based on the remaining reversal risk meeting the 100-year permanence standard. Thus, for CCS projects with lower risk of reversal, the monitoring length can be less than the length of the permanence standard while still meeting the 100-year permanence requirements. Details of a subsurface CCS project – application technical content, approval conditions for operation, monitoring, measurement, testing, reporting, inspection, decommissioning and verification of sequestration – are regulated by the BCER.

B.C.'s regulatory framework (including policy, geological and engineering aspects) thoroughly reviews all applications and does not issue licences or permits if there is any likelihood of adverse impacts to Indigenous and/or other communities.

Many comments spoke to the Technical Discussion Paper and supported adjusting the final protocol moving to a risk-based monitoring period length, rather than a fixed term.

### **Double Counting and Additionality**

The Ministry received comments with concerns that CCSP projects must meet financial additionality requirements. Concerns surrounding financial additionality suggested this requirement could deter investment in B.C. CCS projects.

- The purpose of B.C. offsets is to support projects that depend on their revenue to achieve emissions reductions, not to boost the revenue of projects that would

proceed regardless. If a project can implement decarbonization measures without revenue from offset units, it does not meet the threshold for financial additionality.

- The assertion that this requirement is inconsistent with other jurisdictions does not account for B.C. own high-integrity standards. In B.C., all project plans must include an assertion that the revenue from generating offsets is required to implement the project. This is assessed on a case-by-case basis for all offset projects.

The Ministry previously prepared an [additionality](#) guidance document to help proponents navigate additionality of offset projects. While the guidance is in the context of forest carbon offset projects, the same additionality principles apply for CCSP projects.

### **Next Steps:**

In response to feedback from the 2025 round of engagement, the Ministry is reviewing revisions to the CCSP to recognize and acknowledge consultation requirements for CCS projects in the broader regulatory framework and under the UN Declaration on the Rights of Indigenous Peoples Act. The Ministry is working to finalize the CCSP in Summer 2025.

The Ministry has considered all feedback received and evaluated each comment on its own merit in finalizing the CCSP. The Ministry extends thanks to the continued collaboration with proponents and First Nations to finalize the CCSP to accelerate climate action policy in B.C.