

# ISSUE IN FOCUS



*Celebrating 100 Years*

SASKATCHEWAN  
CHAMBER of COMMERCE

## Proposed Changes to the Greenhouse Gas Reporting Program

### Background:

The Saskatchewan Chamber of Commerce submitted comments on the proposed changes to Environment and Climate Change Canada's Greenhouse Gas Reporting Program (GRGHP) that was released for public comment in early May 2017.

### Issue:

The Chamber has serious concerns with the recommendation to lower the emissions reporting threshold for facilities from 50 kt CO<sub>2</sub>e to 10 kt CO<sub>2</sub>e. According to Environment and Climate Change Canada's consultation document, lowering the reporting threshold would increase the number of facilities required to submit from approximately 575 to over 1,500, with an estimated 6% (16 megatonne) increase in emissions coverage. It was later clarified during a subsequent stakeholder information session that the reported 16 megatonne increase would only account for an actual improvement of 2.2% in overall national emissions figures compared to the currently available figures used to measure sectors that emit less than 50 kt CO<sub>2</sub>e.

The Chamber is of the view that lowering the reporting threshold from 50 kt CO<sub>2</sub>e to 10 kt CO<sub>2</sub>e places an undue and largely unnecessary administrative burden on smaller industrial facilities for what amounts to at best, marginal improvements in the accuracy of national GHG emissions inventory figures. Furthermore, the recommendation to require facilities to provide additional data and apply specific quantification methods to determine emissions by source and activities is excessive and does nothing to reduce the total amount of GHG emissions produced by such facilities.

### Recommendations:

1. That Environment and Climate Change Canada maintain the current GHG emissions reporting threshold for facilities at 50 kt CO<sub>2</sub>e.

2. That Environment and Climate Change Canada retain the use of the single window reporting system to further minimize the compliance burden on businesses.

## **History:**

Letter to Federal Minister of Environment 2017