

## O.Reg.452 Greenhouse Gas Emission Reporting

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### Background

On December 1, 2009, the Ontario Ministry of Environment posted **O.Reg.452 Greenhouse Gas Emission Reporting** Regulation under the Environmental Protection Act. The purpose of the regulation is to develop accurate and verified Greenhouse Gas Emission Reporting in preparation for a future Greenhouse Gas “Cap and Trade” regime.

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### Regulation Framework

The Regulation applies to facilities emitting greater than 25,000 tonnes of carbon dioxide equivalent (CO<sub>2</sub>e) per year from a list of specific activities. The identified activities include general stationary combustion, electricity generation, petrochemical production, petroleum refining and others. There are 30 Greenhouse Gases listed in Table 1 of the Regulation for inclusion in the CO<sub>2</sub>e calculation.

Tracking needs to start in January of 2010 in order to submit the first report on June 1, 2011. Starting in 2011, emissions will be calculated using mandated quantification methods which, in some cases, require instrument calibration and stream sampling. Third party verification will be required for emissions calculated in 2011 and every year thereafter.

Under the Regulation, the main steps for industry will be:

- Reporting for all regulated sources from a facility that are emitting a total of 25,000 tonnes of carbon dioxide equivalent (CO<sub>2</sub>e) or more per year;
  - Reporting of 2010 emissions in the year 2011, and reporting annually thereafter;
  - Flexibility to use the best alternative quantification methods for 2010 emissions, to be reported in 2011;
  - Use of standardized methods to quantify emissions starting for the reporting of 2011 emissions in 2012;
  - Third party verification for the 2011 emissions, to be verified in 2012 and every year thereafter;
  - Emission reports to be submitted on June 1 of each year starting in 2011; and
  - Verification to be completed by September 1 of each year, starting in 2012.
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### Who Will Be Required to Report?

The threshold for reporting for this regulation is lower than the Federal Greenhouse Gas (GHG) threshold of 50,000 tonnes per year of CO<sub>2</sub>e. If your facility reports to the Federal GHG registry, you will need to report under this regulation. Otherwise, your facility will need to calculate the annual CO<sub>2</sub>e emissions to determine your requirement to report.

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**Will this be Harmonized with Current Emissions Reporting?**

Currently, annual reporting for NPRI, and Ontario Reg 127 reporting is done through the OWNERS website. It is anticipated that this new reporting will also be done using the OWNERS website.

**One Window to National Environmental Reporting System (OWNERS)**  
Web site. [www.owners.gc.ca](http://www.owners.gc.ca)

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**Impact on Facilities**

A number of facilities that don't currently report Greenhouse Gases will be required to report due to the lower threshold. The methods for estimating GHG are prescribed by the regulation, and may differ from those used in the past for the Federal GHG reporting. This regulation will require validation of emission estimates and this translates into more onerous requirements such as flow meter calibration and fuel stream sampling. Facilities will need to hire a third party Accredited Verification Body (AVB) to verify the annual emissions calculations using ISO 14064-3.

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**How Can LEHDER Help?**

LEHDER can assist with the following:

- Determine the requirement for GHG reporting at a Facility;
- Review and update GHG emission calculations to ensure they comply with the Guidance provided by the Regulation;
- Identify gaps in facility information and recommend a strategy to ensure compliance with the regulation; and
- Calculate annual GHG emissions and report using the method prescribed in the Regulation.

For further information or questions, please contact:

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**About LEHDER**

LEHDER is one of the largest Air Quality Management consulting companies in Canada. Our team of consulting professionals is built around our core strength in industrial environmental, health and safety management. LEHDER recognizes our client's need to make decisions that provide for operational flexibility while meeting regulatory, economic and social requirements.

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Factsheet: 0044

