

B.C. Climate Solutions Council

To: Minister of Environment and Climate Change Strategy, Honourable George Heyman

cc: Minister of Energy, Mines and Low Carbon Innovation, Honourable Josie Osborne; Deputy Minister, Kevin Jardine; Assistant Deputy Minister, Jeremy Hewitt

March 6, 2023

Dear Minister Heyman,

Re: Net zero new industry

The CleanBC Roadmap commits to a requirement for all large new industrial facilities to have plans to show how their emissions will align with B.C.'s 2030 and 2040 targets, and to achieve net zero by 2050. Given that industrial emissions made up over 40% of the province's emissions in 2019, and some industrial sectors are forecast to grow, ensuring that new facilities fit within BC's emissions targets will be critical to the success of the CleanBC climate plan.

That goal presents two distinct issues. First, what level of ambition should be expected from new facilities being planned and built with the knowledge of more stringent provincial emissions targets, ultimately including net zero. Second, how will B.C. deliver compensating reductions from existing emitters to guarantee that new facilities fit within B.C.'s emissions targets, rather than adding to emissions. Lacking the second part, the Net-Zero New Industry strategy presented to the Climate Solutions Council in late 2022 does not ensure that large new facilities align with B.C.'s 2030 and 2040 targets.

We are mindful of historical experience that more stringent new source standards had an unintended consequence of incentivizing continued operation of older, more emissions-intensive facilities. That is likely to be less problematic in a context where there are binding commitments to update standards, but nonetheless this is an issue that should guide provincial policies for existing facilities as well. Policies and regulations should be developed to ensure existing facilities are not inadvertently operating longer at high carbon intensity as a result of net-zero policies for new facilities.

Key areas of concern and recommendations:

We have five main concerns with recommended actions that require further consideration to ensure that this policy achieves the intended goals and that B.C. stays on track to meet our climate targets in 2030, 2040, and 2050.

1. Unlike older industrial facilities, new industrial facilities are being planned with the knowledge that operations must transition to net zero, in most cases during the expected life of the facility. They also may be able to take advantage of new and emerging technologies that were not available when older facilities were built. We thus encourage the government to consult with individual sectors to assess the feasibility of new facilities in that sector reaching net zero as soon as possible.
2. Government must take additional actions to ensure that new facilities fit within B.C.'s targets. The Council's 2022 annual report stressed the challenge of meeting B.C.'s 2030 target because of delays and gaps in policy development and potential for new projects approved yet not accounted for in the Roadmap to

significantly increase emissions. The resulting challenge we now face underscores the importance going forward of anticipating and accounting for new industrial facilities in setting targets for existing emitters.

New facilities that are not net zero will add additional emissions. Operators of those facilities do not have the authority to ensure compensating reductions from other facilities or sectors. We thus do not understand what is meant by the expectation for large new industrial facilities to align their operations with B.C.'s 2030 and 2040 targets, as stated in the Roadmap. It is the provincial government's responsibility to adopt additional policies as needed to deliver compensating emissions reductions.

There are multiple ways this goal could be achieved, including implementation of sectoral flexible regulations, incentives for low-emissions technologies, setting more specific targets for incumbent facilities, or seeking deeper cuts from non-industrial sectors. Without policies to deliver compensating reductions, however, new GHG-emitting facilities *will not* fit within existing targets and B.C. will fail to meet its emissions targets.

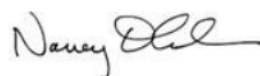
3. Enabling the transition to net zero demands planning for sufficient generation and transmission capacity to support electrification as needed in industry operations, as anticipated by the Minister of Energy, Mines and Low-Carbon Innovation's mandate to create a "climate-aligned energy framework for B.C." In addition, ensuring that new facilities can transition to net zero will require development of complementary policies, such as facilitating the use of negative emissions technologies and offsets (bearing in mind the Council's previous advice on the latter – see the Council's 2020 annual report, appendix 2).
4. We seek greater clarity on how the government proposes to include both upstream and downstream emissions in B.C. as part of the net zero facilities commitment. In some cases, those emissions could be greater than direct emissions from the project itself. Understanding the magnitude, distribution, and opportunities to control these emissions is important.
5. The CleanBC Roadmap acknowledges that government will need to strengthen policies to ensure that B.C. fills gaps and meets its emissions targets. If existing facilities do not have to meet the more stringent policies, achieving climate targets will be compromised, and it creates an unlevel playing field between existing and new facilities, affecting competitiveness. All project approvals must acknowledge B.C.'s climate goals and specify that as policies become more stringent, compliance will be required. Government thus needs to avoid locking in policy at the time of a project's approval. For example, B.C. has not exempted existing emitters from the escalating carbon tax as announced in the 2023 budget.

We understand it is the government's intention to bring forward legislation in 2023 and welcome the opportunity to comment further.

Regards,



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Withheld pursuant to/removed as

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DECISION NOTE

DATE: June 16, 2023

PREPARED FOR: Honourable George Heyman, Minister of Environment and Climate Change Strategy

ISSUE: Net Zero New Industry Consultation and Engagement

RECOMMENDED OPTION:

Release the attached Net Zero New Industry intentions paper and the letter to the Chief Executive Assessment Officer for consultation with Indigenous Peoples. Release the intentions paper to industry.

BACKGROUND:

- The CleanBC Roadmap to 2030 (Roadmap) commits the Province to require all new industrial facilities to develop plans to achieve net-zero emissions by 2050 and align with the Province's 2030 and 2040 emission reduction targets.
 - Building on this framework, the Province's recently announced New Energy Action Framework (NEAF) requires new liquefied natural gas (LNG) facilities to develop a plan to achieve net-zero emissions by 2030.
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-
- The Climate Action Secretariat (CAS) collaborated with a cross-government working group to draft a Net-Zero New Industry intentions paper (attachment 1) to facilitate consultation with Indigenous Peoples and industry.
 - The Province has developed a plan for Indigenous consultation (attachment 2) that will start in the spring of 2023. A distinctions-based approach will be used throughout the process with a particular focus on Nations planning major industrial projects.
 - s.14

- The Province will also discuss the policy with industry, with a focus on facilities currently in the Environmental Assessment (EA) process.
- Consultation and engagement will focus on the net zero new industry policy and will not address Province-wide net zero or the proposed oil and gas cap. If Indigenous Peoples or industry have feedback on these areas, this feedback will be accurately taken and shared with the appropriate policy leads.

DISCUSSION:

The intentions paper sets out the Province's proposed approach to implementing the Net Zero New Industry 2050 and Net Zero LNG 2030 policy. The policy will cover new large industrial facilities that emit more than 10,000 tonnes of carbon dioxide equivalent annually and have not yet received an Environmental Assessment (EA) Certificate (or have not yet received permits to begin construction). These facilities will be required to submit a plan detailing how they will achieve net zero emissions by 2050 (or by 2030 if LNG), for approval by CAS. In 2050 (or 2030 for LNG facilities) and each year thereafter they will be required to achieve net-zero emissions. Reporting will be required for upstream emissions but will not be used in calculating net emissions. Eligible offsets and payments towards an emissions reduction fund will counterbalance remaining emissions.

The intentions paper solicits input on policy design questions, including:

- What type of compliance options (e.g. offsets) should be eligible for achieving net zero;
- Whether the policy should apply to significant expansions of existing facilities; and
- How the Province can support equity between new and existing facilities.

The letter to the CEO was proposed prior to the release of the New Action Energy Framework, which set out the net zero 2030 requirement for LNG facilities in or entering the EA process. The CEO letter sets government policy and the intention is to include it with the net zero new industry policy under the Greenhouse Gas Industrial Reporting and Control Act. This will ensure a consistent policy approach easily referenced in the legislation.

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Industry engagement is expected to occur over summer (once formal notification has been provided to Nations). The intentions paper will be provided to industry, but engagement will focus on specific matters, such as the form and content of net-zero plans.

OPTIONS:

Option 1: Release the attached Net Zero New Industry intentions paper and the letter to the Chief Executive Assessment Officer for consultation with Indigenous Peoples. Release the intentions paper to industry.

Pros:

- Provides a clear Provincial position on the objectives of the policy, with scope for meaningful feedback on design elements.
- Demonstrates progress towards implementing the Clean BC Roadmap to 2030 commitment.
- Allows consultation and engagement on Net Zero LNG 2030 policy position to begin in the timeline provided by the NEAF news release.
- Early feedback on other NEAF or other CleanBC policies can be received, processed, and shared with the policy leads.

Cons:

- Does not include Indigenous Peoples at an early stage of policy development and does not align with the “Interim Approach” document.
- Increased consultation may be needed if Indigenous Peoples see a need for accommodations under multiple NEAF policies.

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RECOMMENDATION

- Option 1.

Approved / Not Approved:



Honourable George Heyman, Minister of
Environment & Climate Change Strategy

June 28, 2023

Date

Attachment(s):

- Net Zero New Industry 2050/Net Zero LNG 2030 Intentions Paper

- Letter to the Chief Executive Assessment Officer on net-zero LNG policy
- Climate Solutions Council Net Zero New Industry Letter (March 6)

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Net-zero New Industry Intentions Paper

1. Summary

British Columbia (B.C.'s) industrial sector is a major employer in communities across B.C. and generates significant economic benefits and government revenue. The Province is committed to maintaining and further strengthening the competitiveness of the sector while ensuring that its legislated greenhouse gas emissions targets are met. A competitive, low carbon industrial sector aligns with B.C.'s climate commitments, attracts clean industries from around the world and positions companies operating here to thrive in a global economy that increasingly values clean, low carbon resource development and manufacturing jobs.

In October 2021, the Province published the *CleanBC Roadmap to 2030 (Roadmap)*, detailing its plan to achieve its legislated 2030 emissions reduction target of 40 percent below 2007 levels and put it on the path to meet future emissions reduction targets. To ensure new industrial development aligns with B.C.'s climate targets, the Roadmap introduced a commitment to require that all new large industrial facilities develop a plan to achieve net-zero greenhouse gas (GHG) emissions by 2050¹.

Further to the commitments set out in the Roadmap, in March 2023, the Province introduced its New Energy Action Framework (NEAF), which (among other commitments), requires all proposed liquefied natural gas (LNG) facilities in, or entering, the Environmental Assessment (EA) process to pass an emissions test with a credible plan to be net-zero by 2030. The Roadmap commitment and NEAF collectively establish a Net-Zero New Industry Policy.

B.C. is proposing to amend the *Greenhouse Gas Industrial Reporting and Control Act* (GGIRCA) and its regulations to implement the Net-Zero New Industry Policy. New facilities will be required to develop net-zero plans that must be approved by the Climate Action Secretariat before the facility is permitted to proceed. The net zero plan will show how the facility considered the best available technologies and practices to minimize on-site emissions in its design to support achievement of 2030 and 2040 targets. The plan will also present how the facility will mitigate the balance of remaining emissions through options such as offsets. In 2050 (2030 for new LNG facilities) and each year thereafter, facilities will be required to achieve net-zero emissions.

Under the *Declaration on the Rights of Indigenous Peoples Act*, the Province has a commitment to develop policy and legislation in consultation and cooperation with Indigenous Peoples. Consultation and cooperation with Indigenous Peoples will occur in 2023 and take multiple formats (webinars and meetings with individual First Nations) and will reflect the different protocols in place with a distinctions-based approach.

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¹ Net zero emissions means that any GHG emissions are balanced by equivalent amounts of GHG removals from the atmosphere.

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2. Background

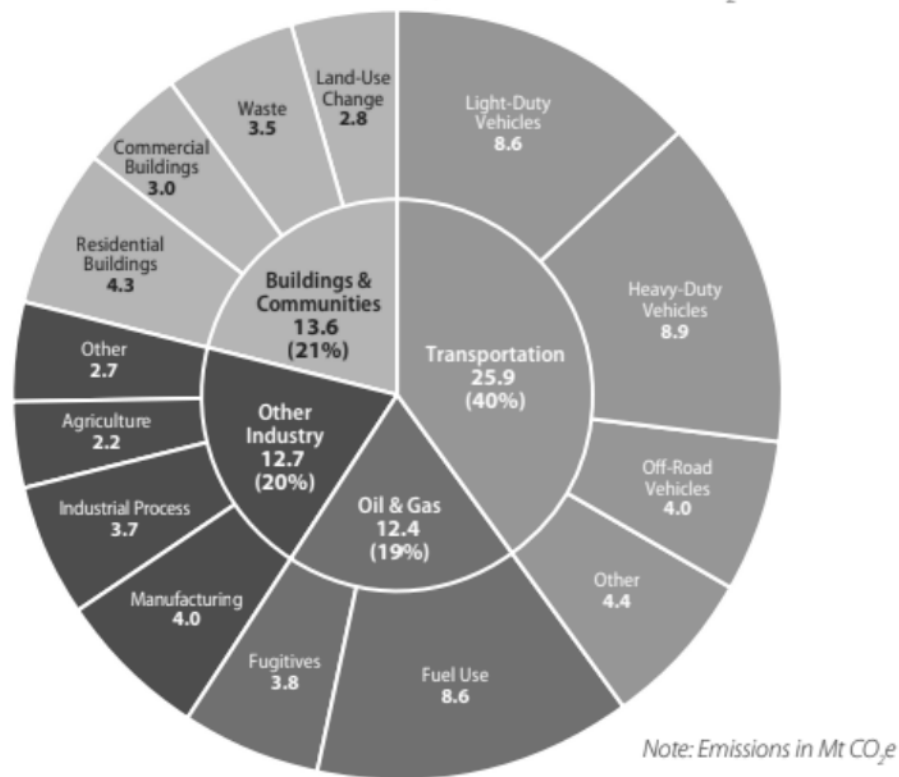
B.C. has established emission reduction targets under the *Climate Change Accountability Act* to reduce province-wide emissions by 16 percent by 2025 (an interim target, not specified in the Act, to guide process towards later, legislated, targets), and 40 percent, 60 percent and 80 percent below 2007 levels by 2030, 2040 and 2050 respectively. The Government also pledged to legislate a province-wide net-zero 2050 emissions target; the Climate Action Secretariat (CAS) will consult on the addition of this new emission reduction target to the *Climate Change Accountability Act*.

To keep the Province on track to achieve its province-wide targets, B.C. established sectoral targets, including for the oil and gas sector (33 to 38 percent reduction from 2007 levels by 2030) and other industry (38 to 43 percent reduction). These sectoral targets were established based on the most feasible and cost-effective way to achieve our province-wide target.

Industrial emissions are a significant part of the Province's greenhouse gas emissions. In 2020, industrial emissions made up approximately 40 percent of the province's total emissions.

Sector-specific Emissions

B.C.'s 2020 Gross Emissions by Sector – 64.6 Mt CO₂e



The [Climate Change Accountability Report \(CCAR\)](#) reports annually on the Province's progress towards its legislated targets. GHG emissions modeling in the 2022 CCAR forecast that B.C.'s plan can achieve 97 percent of its 2030 target, with a shortfall of 0.8 million tonnes carbon dioxide equivalent (CO₂e)². This shortfall is predominantly attributable to changes in the federal government's accounting of emissions in the 2007 baseline year. It also stated that B.C.'s progress to the 2030 target could be significantly impacted if new, high-emitting industrial projects begin operations without planned measures to mitigate emissions.

In March 2023, the B.C. Climate Solutions Council (CSC) provided written advice on the proposed net zero new industry policy. Their key recommendations were the need to 1) assess feasibility for net-zero technology for each sector; 2) ensure that new industry development also aligned with 2030 and 2040 targets; 3) support net-zero through facilitation of electrification, carbon capture and storage and offsets; 4) reconsider the inclusion of upstream and downstream emissions under the net-zero policy; and 5) continue development of climate policy for new and existing facilities to achieve Province-wide net-zero emissions. CAS has incorporated the feedback into the development of its net-zero new industry and other climate policies.

² Carbon dioxide equivalent (CO₂e) means the mass of carbon dioxide that would produce the same global warming impact as a given mass of another greenhouse gas, as prescribed in the Carbon Neutral Government Regulation.

3. Proposed Legislative and Policy Framework

B.C. proposes to amend the *Greenhouse Gas Industrial Reporting and Control Act* (GGIRCA) and its regulations to implement the Net-Zero New Industry Policy. GGIRCA lays out the requirements for large industrial facilities (i.e., those with annual facility emissions above 10,000 tonnes CO_{2e}) to report and limit their GHG emissions. GGIRCA allows the establishment of a maximum level of emissions per unit of production. Facilities have the option to meet this limit through various compliance options including offsets and compliance charges, however limitations may be placed on the use of compliance options.

Amendments proposed will require:

- new, large industrial facilities to achieve net zero emissions in 2050 (2030 for LNG projects) and every year thereafter;
- A Net-Zero Plan to detail how the facility will achieve net zero emissions and demonstrate alignment with 2030 and 2040 targets;
- an analysis of Best Available Technologies (BATs) / Best Environmental Practices (BEPs) considered, including a rationale for technologies or practices not being adopted;
- approval of the Plan by the Climate Action Secretariat before the project may be issued with an EAC or other project approvals;
- review and update of the approved Plan every 5 years.

3.1. Emissions Scope

Emissions subject to net-zero requirements will be all greenhouse gas emissions located at the new industrial facility, including those from stationary combustion, venting, flaring, fugitives, industrial processes and on-site transportation. Emissions from land-use change associated with the construction of the facility are not included in the scope of the policy. Off-site transportation emissions (e.g., logging trucks) are not covered by the policy, but will be covered by the increasing carbon tax.

Facilities will also be responsible for the emissions associated with the generation of purchased electricity, heat, steam, and hydrogen. This is consistent with the scope of emissions included in the net-zero plans under the federal SACC.

The production (e.g., extraction, processing and transmission) of fossil fuels used at B.C.'s facilities creates emissions. Although these midstream and upstream fossil fuel emissions will not be included in the net zero calculations, consistent with SACC, forecast upstream and midstream emissions will need to be reported if they are above a specified threshold. These emissions sources will also be addressed by the regulatory oil and gas cap.

3.2. Facility scope

This policy is applicable to new, large industrial projects. "New" is defined as not yet having obtained an Environmental Assessment Certificate (or that have not yet obtained the required approvals for construction or operation of the facility, for projects outside of the EA process). To align with existing regulatory obligations under GGIRCA, "large" industrial projects are defined as facilities expected to have annual GHG emissions of more than 10,000 tonnes CO_{2e}. Facilities that have received EACs prior to March 31 2023 will not be covered by this policy.

Covered facilities include, but are not limited to, larger oil and gas, mining, pulp and paper and manufacturing facilities; clean energy projects like geothermal, small hydro and wind projects are not expected to be included, as their emissions are not likely to exceed the 10,000 tonnes CO₂e threshold.

This policy will apply to projects regardless of whether they are required to undergo an Environmental Assessment process.

Expansion of existing facilities can cause significant GHG emission increases. The Province is seeking input on whether the net-zero policy should also be applied to expansions of existing facilities.

Questions:

- Should this policy apply to significant expansions of existing facilities that are expected to increase emissions to more than 10,000 tonnes annually? Why or why not?
- What is an appropriate equivalent to issuance of an Environmental Assessment Certificate for those projects that do not trigger the Environmental Assessment process?

3.3. Net-Zero Plans

A Net-Zero Plan must show how the project will achieve net-zero emissions in 2050 (2030 for LNG facilities) and each year thereafter, as well as aligning with achievement of our 2030 and 2040 legislated targets. The Plan must prioritize on-site emission reductions over other compliance tools, with consideration for best available technologies and best environmental practices (BAT/BEPs). BAT/BEPs are the lowest emission technologies, techniques, or practices, including emerging technologies, that are technically and economically feasible. The Plan must also consider making the project able to adopt, at a later point, technologies and practices that are not currently feasible (e.g., making an off-grid facility able to be electrified should grid connection become available.)

For projects undergoing the Environmental Assessment process, the Plan must be developed before the Readiness Decision is made by the EAO; for projects outside the Environmental Assessment process, the Plan must be completed prior to receiving necessary approvals under other relevant legislation.

Plans must be updated at least every five years from the commencement of operations, unless otherwise authorized by the Director appointed under GGIRCA. Each update must:

1. include an analysis of best available technologies and processes to minimize GHG emissions; and
2. provide an explanation and rationale for the technologies and measures that will be implemented and those that were deemed unfeasible.

A proposed draft outline (see appendix A) provides the proposed net-zero plan elements. This draft builds on the SACC net-zero plan requirements. It will continue to be refined as the policy is developed.

Questions:

- How should the assessment of technical and economic feasibility of BAT/BEP be conducted and updated over time?
- What should be the minimum expectations for a new facility's immediate adoption of clean fuels and technologies in their net-zero plans?
- What should be the implications/consequences be for a facility if their net-zero plans are behind schedule or not implemented?

3.4 Compliance options

Most facilities are expected to have some residual emissions in 2050 (or 2030 for LNG facilities) even after being designed to have the lowest possible emissions. To mitigate these emissions, some facilities may be able to adopt carbon capture and sequestration technology on site. To provide some flexibility, the Province is also considering offering facilities additional compliance options: the purchase of high-quality offsets (compliant with BC-eligible, internationally recognized, standards) or compliance payments.

The retirement of offsets could be used for compliance under the net-zero policy, with potential limitations such as the number of offsets permissible, eligible vintage (i.e., year of issuance) and type (e.g., offsets issued under future protocols for direct air capture). Limitations on the quantity, type, and vintage of offsets can help support the prioritization of on-site emissions reductions.

Questions

- What type of offsets should be eligible as a compliance option?
- Should there be limitations on how many offsets facilities can use?
- Should facilities be allowed to bank a limited number of offsets ahead of the year of obligation and if so, under what terms?
- Are there restrictions to the use of carbon capture and sequestration emissions reductions outside of B.C.'s offset system that would ensure their credibility?
- Should compliance payments be used as a compliance option? Why or why not?
 - How should the compliance payment rate be determined (i.e., aligned with the carbon price level)?
 - Should there be a limit on the extent to which this compliance option can be used?

4 Other considerations

The Net-Zero New Industry Policy will apply requirements and costs on new, but not existing, industrial facilities. This will add capital, operating and compliance costs to new facilities, that are not faced by existing facilities. These costs may reduce new facilities' competitiveness against already-existing industrial facilities and those in other jurisdictions that don't face the same requirements, however, carbon pricing policy design is intended to balance these possibilities to provide equity across new and existing facilities.

The net zero new industry policy is being implemented along with other industrial climate policies; including the transition to a made-in-B.C. Output-Based Pricing System; the implementation of an oil and gas sector cap; and an industrial methane reduction policy. The Province will examine the interactions between these and seek to find efficiencies and minimize compliance and administrative burden by aligning policies to the degree possible.

Questions

- How can the Province support equity between new and existing industrial facilities?
- How can the Province continue to foster industrial development under the Net-Zero New Industry Policy?
- What support does new industry need to thrive within a Net-Zero New Industry Policy context?

- How can the Province best ensure complementarity among various carbon reduction tools, including the OBPS, oil and gas sector cap, methane regulations, and net-zero new industry requirements?

5. Enhancing the current industrial facility approval process

Industrial facilities can reduce their GHG emissions at different stages of their lifecycle. The proposed policy outlined is intended to build on the existing, well-established, design and approval processes for construction of new, large industrial facilities.

In general, the lowest-cost and most-efficient emission reductions are achieved in the design stage before a facility is built and operational. In some cases, “deeper” reductions may not be immediately possible due to infrastructure or technology constraints (e.g., when clean electricity is not available). Sometimes future emission reduction measures can be anticipated and planned for at the design stage (e.g., building a facility that is grid interconnection-ready).

5.1. Environmental Assessments

The Environmental Assessment Office (EAO) assesses major projects in B.C. for potential environmental, economic, social, cultural and health effects and effects on Indigenous nations and their rights. An EA applies to many large industrial projects and explicitly considers a project’s GHG emissions, including the potential effects on the Province being able to meet its targets under the *Greenhouse Gas Reduction Targets Act*. The EA process includes the identification and evaluation of mitigation measures, including emission reduction measures that would be required for a project to proceed.

Similarly, the federal Government, in approving major projects, also considers whether the project’s greenhouse gas emissions are in line with their economy-wide net-zero 2050 target. The federal *Strategic Assessment of Climate Change* (SACC) policy applies to large industrial facilities listed within the *Impact Assessment Act* which have a lifespan beyond 2050. Under SACC, covered industrial facilities must develop a plan to achieve, by 2050, net zero scope 1 (those from the facility and on-site transportation) and scope 2 (those from the generation of acquired electricity, heat and hydrogen) emissions. These facilities are also required to report on the forecasted upstream emissions associated with the production of fossil fuels used by the facility if they are above a threshold, including emissions associated with transmission and transport.

When a project is required to conduct an environmental assessment under both the Provincial *Environmental Assessment Act* and the federal *Impact Assessment Act*, there is an agreement in place that ensures the two governments will carry out a single, cooperative environmental assessment while retaining their respective decision-making powers. This means Provincial and Federal ministers make independent decisions from a single process.

Some projects may not trigger an environmental assessment under either the *Environmental Assessment Act* or the *Impact Assessment Act*. (Those facilities will, if their emissions are greater than 10,000 tCO₂-e, be covered by the net-zero policy.)

5.2. Major project approval process

The Early Engagement phase is the start of the regulatory process with the EAO in which proponents identify the primary emission reduction measures through project design. At the end of the Early Engagement phase, the proponent submits a Detailed Project Description. Based on the description, the

EAO will make a Readiness Decision to determine if the project should a) be exempted from the Environmental Assessment process and allowed to go directly to permitting reviews conducted by other agencies; b) proceed to an Environmental Assessment; c) be terminated from the Environmental Assessment process (i.e., not be allowed to continue development); or d) be required to provide more information prior to making this decision (figure 1). The Readiness Decision is based on the project's level of potential or known adverse effects, the ability to mitigate such effects and its alignment with government policy. EAO officials must seek to achieve consensus with participating Indigenous nations before making a Readiness Decision.

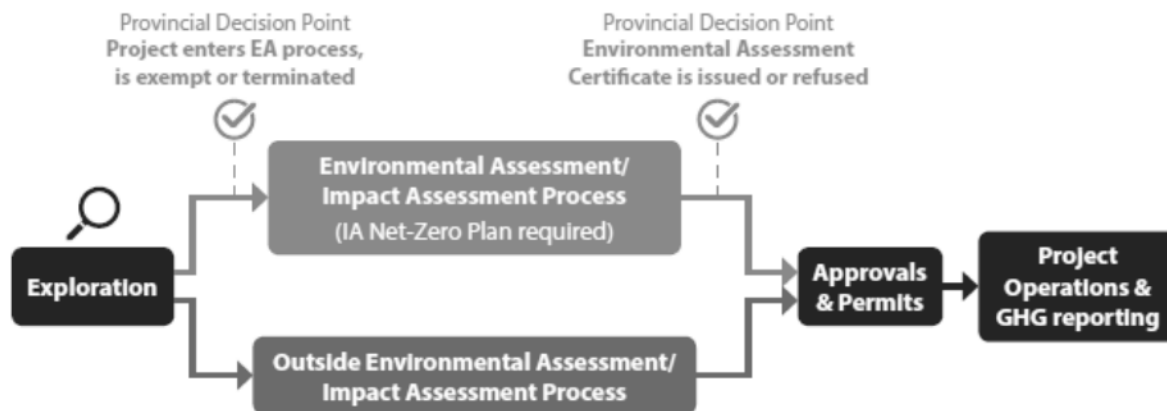


Figure 1. Current regulatory process for B.C. industrial projects.

The processes under the provincial *Environmental Assessment Act* and the federal *Impact Assessment Act* require that every Environmental Assessment consider a project's GHG emissions and provide additional information (listed in the [Application Information Requirement Guidelines and SACC guidance, where applicable](#)) including, but not limited to:

- a description of each of the project's main sources of GHG emissions, by GHG type;
- measures identified to mitigate GHG emissions, including through project design and the use of Best Available Technologies; and,
- identification of emissions offsetting and carbon capture and sequestration options.

If a project is approved, binding conditions can be placed on a project including requiring the management or mitigation of GHG emissions. The *Environmental Assessment Act* stipulates that failure to meet a project condition could lead to the suspension, cancellation, or amendment of the Certificate. Emission conditions are determined on a project-by-project basis based on several factors, including the project's potential effect on the Province's emission reduction targets and/or its ability to reduce emissions later in its lifecycle.

5 Appendix A: DRAFT Outline of Net Zero Plan content requirements

As noted above, this is an initial draft building on the requirements of a net zero plan under the SACC, and will continue to be refined as feedback is received and the policy is developed.

Plan Structure

- Net-zero plans must be:
 1. **Timebound:** the Plan must have different phases in the project life to demonstrate ability to meet 2030, 2040 and 2050 targets (e.g., current, near horizon, future operation)
 2. **Measurable:** the Plan must have milestones based on the expected GHG emissions and project phases that the Proponent can track
 3. **Evergreen:** the Plan must be a living document and be reviewed and updated at least every five (5) years including current Best Available Technologies (BATs) / Best Environmental Practices (BEPs)
- Plans must account for the following phases:
 - **Initial:**
 - the expected/current operational GHG emissions and the expected GHG reductions for any BATs / BEPs that were deemed unfeasible.
 - **Current:**
 - the expected/current operational GHG emissions and the expected GHG reductions for any BATs/BEPs that were deemed unfeasible.
 - an assessment of the previous cycle, most immediate and/or recent milestone, assessment of risk of missing net-zero GHG target, and a current BAT analysis.
 - **Near Horizon:**
 - actionable and measurable objectives and an end of cycle emissions target.
 - a detailed plan over the following cycle, covering 5 years.
 - **Future Operation:**
 - a high-level plan/approach for the remaining years of operation to 2050.
 - the required GHG reductions under each pathway identified to reach net-zero by 2050 and a high-level justification for why the GHG reduction is realistic.

The plan must include at a minimum:

Project Description:

- A brief qualitative explanation of the project scope

Engagement with Indigenous Peoples

- Early and ongoing engagement with First Nations title and rights holders and indigenous groups should inform plans. Input received and how it has been actioned or addressed should be included in the plan.

GHG Emissions:

- A quantitative description of the project's estimated annual net GHG emissions over the lifetime of the project and associated emissions intensity (EI).
 - must include facility emissions and acquired energy emissions.
 - emissions identified must align with the project's maximum design capacity, and the expected operation capacity.

- A set of EI targets (and/or emission targets if EI is not relevant) at specified time intervals until the project achieves net-zero emissions.
 - target emissions must align with the applicable net-zero target timeline based on type of facility (i.e., 2030 for new large LNG facilities, or 2050 for all other facilities).
- A quantitative description of the project's estimated annual upstream GHG emissions over the lifetime of the project.

An assessment of the impact of the project's emissions on B.C.'s ability to meet its GHG targets.

Technology Scope:

- An analysis of the BATs and BEPs considered, including:
 - a list of all potential GHG mitigation measures considered.
 - a list of potential GHG mitigation measures selected that are to be implemented in the project, including the following:
 - The potential quantity and percentage reduction in GHGs associated with each technology or measure;
 - The level of technology maturity
 - Planned timeline for technology implementation; and
 - The potential barriers, and proposed solutions, to implementing the selected mitigation measures.
 - considerations must be provided for the cost, geographic location, technology readiness, etc. of the technologies proposed as per the chart below.
 - a rationale must be provided for eliminating each technology or practice that was not selected for implementation.



Other GHG Mitigation Measures:

- A description of any additional mitigation measures that will be implemented to achieve net-zero emissions targets.
- If applicable, this must include:
 - a description of CCS technologies to be implemented; and
 - identification of the type of eligible offset credits that will be targeted and procurement plan for acquiring those offsets.
- For each mitigation measure used, the percentage utilized relative to the projected total annual project emissions must be provided.

Implementation Plan:

- An outline of the project schedule including construction and operational timelines.
- A description of:
 - the relevant data sources, assumptions, and information to support a feasible implementation plan;
 - factors associated with the schedule such as schedule dependencies, constraints, and risk; and,
 - supportive actions needed (e.g., infrastructure needs for electrification).
- The plan may describe the process the proponent will follow in order to make the decisions and investments needed to achieve net-zero emissions by 2050 (and 2030/2040 targets), where specific technologies are not yet certain.