GHG Reporting Requirements Become More Complex

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The U.S. EPA has added new requirements to the mandatory greenhouse gas (GHG) reporting rule. In particular, reports must now include parent company information. The GHG reporting rule applies to industrial facilities that emit more than 25,000 tons of GHGs per year, as well as suppliers of fossil fuels and industrial GHGs. For 2010 emissions, the first report is due March 31, 2011.

Deceptively Simple?

Reporting parent company information may appear simple, but in reality it can be quite complex. The EPA has provided different rules for when a company is wholly owned by a single U.S. parent, is wholly owned by a foreign company, is co-owned by more than one U.S. parent, is co-owned by a U.S. parent and a foreign company, or is owned by a joint venture.

Throw in the complexities that arise when different parts of the same operation are owned by different but related companies or when real estate is owned separately from operations, and the issue becomes even more confusing.

The new rule also requires that all applicable North American Industrial Classification System (NAICS) codes be listed as well as information on whether emissions are a result of cogeneration. The EPA's new rule was published in the September 22 *Federal Register* at 75 Fed. Reg. 57669.

Contact Us

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