Greenhouse Gas Emissions from Industrial Companies in Canada: 1998

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October 2000



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The Pembina Institute is an independent, citizen-based think tank and activist organization. We seek to ensure environmental protection through research and education; practical technological solutions and advice to businesses, individuals and communities; and effective development and advocacy of environmentally-sound public policy.

The Institute's Climate Change Program works to design, develop, promote and implement actions that protect the climate through improvements in the efficiency of fossil fuel energy production and use, and through a transition to the renewable energy that will power the world's economy in the 21st century.

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Greenhouse Gas Emissions from Industrial Companies in Canada: 1998 ISBN 0-921719-35-3 Copyright © 2000 by the Pembina Institute

Summary and Conclusions

- 1. Canada's largest greenhouse gas (GHG) emitters are industrial companies, responsible for over 60 percent of Canada's total emissions. It is of major public interest to examine how they are responding to that responsibility on a company-specific basis. We have therefore extracted company-specific emissions data from the only current organized source of such data—the Voluntary Challenge and Registry (VCR) program. We found that 115 private sector and/or industrial entities made submissions to the VCR by June 30, 2000 stating their 1998 emissions (see table 1 for the largest emitters).
- 2. Setting aside an exceptional increase in emissions at Ontario Hydro and an exceptional decrease at DuPont Canada, our company-specific analysis shows that most industrial sectors experienced relatively small changes in emissions between 1997 and 1998, in keeping with the one percent rise in Canada's total emissions (see table 2). However, significantly more companies reporting to the VCR experienced large increases in emissions between 1997 and 1998 than experienced large decreases (see tables 3-6).
- 3. Between 1990 and 1998, a period during which Canada's total emissions rose by 13 percent, our company-specific analysis shows similar increases among integrated oil and gas production and refining companies and in the mining and metals sector. Emissions from the electricity generation and oil and gas production sectors rose much more quickly than Canada's total emissions, while emissions from the pipeline sector rose four times more quickly than the national total. Emissions from natural gas utilities were nearly stable, while emissions from the chemicals sector (excluding DuPont Canada) fell by a small amount. The forest products sector stands out for its large decrease in emissions over this period, although this decrease is only real if industrial extraction of wood from Canada's forests is sustainable (see table 2).
- 4. Between 1990 and 1998, far more companies experienced large increases in emissions than experienced large decreases (see tables 9-12, especially tables 9 and 11). Sixteen companies actually increased their emissions intensity (emissions per unit of production), out of the 58 for which it was possible to do this calculation. These 16 include some of Canada's largest emitters (see table 13). Only ten companies out of the 58 reduced their emissions intensity at an average rate of more than four percent per year—roughly the rate of reduction in emissions intensity that Canada's economy as a whole needs to achieve to meet our commitment under the Kyoto Protocol through domestic emission reductions (see table 14).
- 5. Since 1995, Canada's governments have relied largely on voluntary initiatives to influence GHG emissions. During this period, the VCR has been, and remains to this day, the flagship national program to address climate change. The previous three points make clear that the VCR has utterly failed to bring about the kinds of emissions reductions that Canada will need to meet its Kyoto commitment—to reduce GHG emissions by six percent from 1990 levels during the 2008-2012 period. Indeed, companies reporting their emissions to the VCR, which are presumably the Canadian companies most engaged in the climate change issue, have as a group been increasing their emissions substantially (see table 2).
- 6. Five years after the VCR program was launched, a lengthy catalogue still exists of variations and inconsistencies in the methodology used by companies to calculate the emissions they report. This clearly indicates that voluntary reporting of GHG emissions cannot provide information about company-specific emissions at an adequate level of data quality (see section 3). There is also widespread double counting of emissions among companies reporting emissions to the VCR. If

and when a dollar value is placed on emissions, for example by a future domestic emissions trading system (see point 8 below), an emissions accounting system will need to be in place that includes clear and sensible rules for how to account for and allocate emissions (see section 3.1.)

- 7. Our analysis shows that, overall, the level of meaningful participation of Canada's major industrial greenhouse gas emitters in the VCR program is inadequate and showing no signs of improving significantly. VCR participants reporting their greenhouse gas emissions likely represent no more than half of Canada's industrial GHG emissions, and possibly somewhat less than half. Five years after the VCR was launched, only about one-sixth of participants are managing to take the basic step of reporting their emissions. Some of Canada's largest GHG emitters do not report their emissions to the VCR. No companies at all from the aluminum, cement, and iron and steel sectors made VCR submissions by June 30, 2000 stating their emissions for 1998. Several major Canadian companies with substantial GHG emissions reported their 1997 emissions to the VCR but then failed to report their 1998 emissions (see section 4.)
- 8. The previous two points make abundantly clear that reporting of GHG emissions by significant industrial emitters should be mandatory in Canada, with requirements for consistent methodology and clear and sensible rules for how to account for and allocate emissions. Company-specific reporting of emissions of toxic substances is already mandatory under the National Pollutant Release Inventory; it is inexplicable that reporting of GHG emissions, which are responsible for what many agree is the world's most serious environmental threat—that is, climate change—should be optional. Canada will, in any case, have to move to comprehensive tracking of GHG emissions on a company-specific level if it is to introduce a major economic instrument, such as domestic emissions trading, as part of its national strategy on climate change. There is already widespread and increasing acceptance that such an instrument will be required.
- 9. In view of points 5 and 8 above, federal and provincial Energy and Environment ministers, meeting in Quebec City on October 16 and 17, 2000, must commit to:
 - adopt complementary financial incentives and regulatory instruments capable of bringing about the meaningful reductions in Canada's industrial GHG emissions that voluntary programs are incapable of achieving on their own; and
 - implement mandatory, consistent and clear reporting of GHG emissions by significant industrial emitters.

1. Introduction

According to mainstream scientific opinion, as reported by the Intergovernmental Panel on Climate Change and many other authorities:

- emissions of greenhouse gases (GHG) from human activity, principally carbon dioxide, are the largest current driver of climate change;
- if emissions continue upwards according to plausible "business as usual" scenarios, profound changes, unprecedented in the past 10,000 years, are expected to affect the earth's climate, oceans and ecosystems during the 21st century;
- emissions need to be reduced from current levels by over 50 percent if concentrations of GHG in the atmosphere are to stop rising.¹

Governments have responded to these findings by adopting the United Nations Framework Convention on Climate Change (1992) and the Kyoto Protocol (1997). The ultimate objective of the Framework Convention, which entered into force in 1994, is the "stabilization of greenhouse gas concentrations in the atmosphere at a level that would prevent dangerous anthropogenic [humancaused] interference with the climate system." As a first step towards this objective, the Kyoto Protocol subjects industrialized countries to legally-binding emissions limitation targets that add up to a five percent reduction of emissions from their 1990 level during the five-year period 2008-2012. The Protocol has not yet entered into force, and many of its operational details remain to be decided at the sixth Conference of the Parties (COP 6) to the Framework Convention, which will take place November 13-24, 2000 in The Hague, Netherlands. A successful COP 6 should open the way for industrialized countries to ratify the Protocol. Fifty-five countries, including countries accounting for 55 percent of industrialized country carbon dioxide emissions in 1990 must ratify the Protocol in order for it to enter into force.

Under the Kyoto Protocol, Canada must reduce its GHG emissions by six percent from their 1990 level during 2008-2012. Although the Protocol is not yet in force, the federal government has publicly committed to achieve Canada's Kyoto target.² However, according to Environment Canada's most recent report on Canada's GHG emissions,³ those emissions rose by 13 percent between 1990 and 1998. And the latest official projections show Canada's emissions rising to 27 percent above their 1990 level by 2010 if current government policies remain unchanged.⁴

This situation underlines the importance of the meeting of federal and provincial Energy and Environment ministers in Quebec City on October 16-17, 2000. At this meeting, ministers have agreed to give "final consideration" to a National Implementation Strategy on Climate Change, and to discuss a first three-year business plan of "specific actions" under the Strategy. The Quebec City meeting comes after a two-year National Climate Change Process, under which stakeholders from government, industry, environmental groups and universities identified over 300 measures that Canada could implement to reduce its GHG emissions. Modelling conducted under the National Process has shown that various combinations of these measures would allow Canada to reach its Kyoto target. However, there is doubt as to whether ministers have the political will to put even a significant subset of them into

¹ See the Pembina Institute's website http://www.climatechangesolutions.com/english/science/ for a broader presentation of climate change science, with full references.

² For example: in the most recent Speech from the Throne (October 1999).

³ Environment Canada (September 2000), *Backgrounder - Greenhouse Gas Emissions 1990-1998*. Available at http://www.ec.gc.ca/press/000906_e.pdf.

⁴ National Climate Change Process Analysis and Modelling Group (December 1999), *Canada's Emissions Outlook: An Update*. Available at http://www.nrcan.gc.ca/es/ceo/update.htm.

effect. As documented in recent studies by the Pembina Institute,^{5,6} Canada's federal and provincial governments have spent the past decade talking about climate change but doing very little to address it.

1.1 Company-Specific Emissions

Canada's largest GHG emitters are industrial companies. Industrial stationary sources, including electricity generation, directly accounted for 51 percent of Canada's GHG emissions in 1998 (the latest year for which data are available). If emissions from heavy duty and off road vehicles, domestic marine and rail transportation are included—on the basis that these modes of transportation are used overwhelmingly by industrial operations and to take industrial products to market—the proportion rises to 61 percent. This figure still excludes emissions from commercial buildings and agribusiness, both of which arguably fall under the heading "industry."⁷

Canada's success in addressing climate change therefore depends first and foremost on what happens to the GHG emissions of its industrial companies. Leading industrial GHG emitters hold a large share of responsibility for Canada's emissions, and it is of major public interest to examine how they are responding to that responsibility on a company-specific basis. In addition, public access to information about individual corporate polluters is a key mechanism for encouraging emission reductions.

These considerations led the Pembina Institute to publish the first ever comprehensive study of Canada's company-specific industrial GHG emissions in March 2000. That study, which examined emissions over the period 1990-97, was included in our report *Five Years of Failure: Federal and Provincial Government Inaction on Climate Change During a Period of Rising Industrial Emissions.*⁸ The present study applies the methodology used in the "Five Years of Failure" report to 1998 emissions.

Our approach is to compile data from submissions made by companies to the Voluntary Challenge and Registry (VCR) program. The VCR, established in 1995, encourages private and public sector organizations to voluntarily limit their net GHG emissions. During a period in which Canada's governments have relied largely on voluntary initiatives to influence GHG emissions, the VCR has been, and remains to this day, the flagship national program to address climate change. Participating organizations, mostly industrial companies, submit publicly accessible action plans and progress reports that can be downloaded from the VCR website.⁹ For the present study we verified all the VCR submissions made by private sector and/or industrial entities up to June 30, 2000 in order to identify those reporting their emissions for 1998. We then analyzed all the submissions reporting 1998 emissions in order to extract additional information, where available, about emissions for 1990 and 1997 as well as production data for all three years.

Voluntary reporting of emissions, as solicited by the VCR, has two large and obvious drawbacks, which are discussed in more detail in sections 3 and 4. First, a significant number of major emitters as well as numerous smaller emitters simply do not report their emissions (see section 4). Second, there is no requirement that companies use a standard method of calculating emissions data, nor even that they provide clear explanations of how data were calculated (see section 3). These drawbacks unfortunately affect the quality of the results presented in section 2.

⁵ Robert Hornung and Matthew Bramley (March 2000), *Five Years of Failure: Federal and Provincial Government Inaction on Climate Change During a Period of Rising Industrial Emissions*, Pembina Institute. Available at http://www.pembina.org/pubs/fiveyears.htm.

⁶ Pembina Institute (October 2000), *Provincial Government Performance on Climate Change: 2000*. Available at http://www.pembina.org/pubs/ReportCard.htm.

⁷ Environment Canada, *op. cit.*

⁸ Robert Hornung and Matthew Bramley, *op. cit*.

⁹ http://www.vcr-mvr.ca/AlphaList.cfm.

2. Results

The reader is referred to sections 3 and 4 for discussion, respectively, of the quality and completeness of the data presented here. Data for 1990 and 1997 (below) may differ from those we have published previously¹⁰ as some companies have changed their greenhouse gas emission calculation methodology. Emissions are reported in units of megatonnes (millions of tonnes, Mt) or kilotonnes (thousands of tonnes, kt) of "carbon dioxide equivalent" (CO₂E).¹¹

2.1 Canada's Largest Emitters

By June 30, 2000, 115 private sector and/or industrial entities had made submissions to the VCR, stating their 1998 emissions. The largest emitters are shown in table 1.

A few of Canada's top GHG emitters do not report to the VCR and may therefore be missing from table 1. The most likely omissions are among aluminum, cement, and iron and steel producers, none of which reported 1998 emissions to the VCR, and in the chemicals sector, in which only six companies reported their 1998 emissions. However, missing companies are likely to have emissions closer to 5 than 10 Mt CO_2E . See section 4 for further discussion on this point.

2.2 Overall and Sectoral Emission Changes

Of the 115 companies reporting 1998 emissions to the VCR, 71 also reported their 1990 emissions calculated in a comparable manner, and 68 companies reported both 1990 and 1997 emissions. Emissions trends for these 68 companies are analyzed by industrial sector in table 2.

It should be emphasized that with the exception of electricity generation, a sector where the vast majority of Canada's emissions are reported to the VCR, sectors' trends shown in table 2 are not necessarily representative of the national trends for those sectors. This is because, as we conclude in section 4, companies reporting emissions to the VCR likely represent no more than half of Canada's industrial GHG emissions, and possibly somewhat less than half. On the other hand, as noted above, most of Canada's leading GHG emitters are included here.

¹⁰ Robert Hornung and Matthew Bramley, op. cit.

¹¹ A mixture of different greenhouse gases is expressed as a carbon dioxide equivalent (CO₂E) by multiplying the amount of each gas other than CO₂ by its "global warming potential" (GWP) which measures how much more strongly it contributes to the greenhouse effect than CO₂. For example, methane has a GWP of 21, which means that one tonne of methane represents 21 tonnes of CO₂E.

| Company | Sector | 1998 emissions (Mt CO₂E) | 1997 emissions (Mt CO₂E) | 1990 emissions (Mt CO₂E) | % change 1997-98 | % change 1990-98 |
|-------------------------------|--------------------------------------------------------------|--------------------------------|--------------------------------|--------------------------------|------------------------|---------------------|
| Ontario Hydro | Electricity generation | 31.0 | 22.8 | 26.0 | 36 | 19 |
| TransAlta | Electricity generation | 23.4 | 24.1 | 25.8 | -3 | -10 |
| TransCanada | Pipelines; electricity generation | 17.3 | 16.6 | 10.4 | 4 | 66 |
| SaskPower | Electricity generation | 14.7 | 14.4 | 10.6 | 2 | 39 |
| Imperial Oil | Oil and gas production and refining; chemicals | 10.8 | 11.5 | 10.8 | -5 | 0 |
| New Brunswick Power | Electricity generation | 9.7 | 8.6 | 6.3 | 13 | 54 |
| ATCO Electric | Electricity generation | 9.5 | 10.1 | 7.7 | -6 | 23 |
| Syncrude Canada | Oil and gas production | 8.9 | 8.5 | 7.2 | 5 | 23 |
| EPCOR | Electricity generation | 8.6 | 7.5 | 3.5 | 14 | 149 |
| Nova Scotia Power | Electricity generation | 8.0 | 7.8 | 6.8 | 2 | 17 |
| Shell Canada | Oil and gas production and refining | 7.3 | 7.6 | 7.6 | -4 | -4 |
| Petro-Canada | Oil and gas production and refining | 6.9 | 7.3 | 6.9 | -6 | 0 |
| Amoco Canada Petroleum | Oil and gas production | 6.6 | n/a | 6.3 | n/a | 6 |
| Husky Oil Operations | Oil and gas production and refining | 6.5 | 6.5 | 3.8 | 1 | 70 |
| Suncor Energy | Oil and gas production and refining | 6.2 | 5.7 | 5.0 | 9 | 24 |
| DuPont Canada ^a | Chemicals | 5.4 | 10.4 | 11.2 | -48 | -52 |
| Westcoast Energy ^b | Pipelines; natural gas utility; electricity generation | 5.2 | 5.4 | 4.1 | -4 | 26 |

Table 1. GHG emissions of those companies that made a VCR submission by June 30, 2000 stating their emissions for 1998, and whose emissions exceeded 5 Mt CO₂E.

 ^a Data exclude emissions associated with electricity sold to Ontario Hydro
 ^b Data probably include emissions associated with purchased electricity but this is not stated explicitly in the company's submission

| Sector | Number of companies | 1998 emissions (Mt CO₂E) | 1997 emissions (Mt CO₂E) | 1990 emissions (Mt CO₂E) | % change 1997-98 | % change 1990-98 |
|----------------------------------------|------------------------|--------------------------------|--------------------------------|--------------------------------|------------------------|------------------------|
| Electricity generation, total | 11 | 109.1 | 98.3 | 90.0 | 11 | 21 |
| - excluding Ontario Hydro | 10 | 78.1 | 75.5 | 64.0 | 3 | 22 |
| Oil and gas production and refining | 6 | 37.7 | 38.5 | 34.1 | -2 | 10 |
| Pipelines | 4 | 23.6 | 23.2 | 15.4 | 2 | 53 |
| Oil and gas production only | 9 | 16.8 | 16.6 | 13.9 | 1 | 21 |
| Chemicals, total | 6 | 14.7 | 20.0 | 21.0 | -26 | -30 |
| - excluding DuPont Canada | 5 | 9.3 | 9.6 | 9.7 | -2 | -4 |
| Forest products | 14 | 5.3 | 5.9 | 6.7 | -10 | -21 |
| Mining and metals | 7 | 3.2 | 3.0 | 2.9 | 6 | 10 |
| Natural gas utilities | 5 | 1.9 | 2.0 | 1.9 | -2 | 2 |
| Manufacturing | 6 | 0.8 | 0.9 | 1.3 | -9 | -35 |
| Total excluding electricity generation | 57 | 104.1 | 110.1 | 97.2 | -6 | 7 |
| Total for Canada ¹² | | 692 | 685 | 612 | 1 | 13 |

Table 2. GHG emissions in 1990, 1997 and 1998 by industrial sector from companies that made a VCR submission by June 30, 2000 stating their emissions for all three years.

Some of the companies included in table 2 have operations that span more than one of the industry sectors shown; such companies have been assigned to the sector that corresponds (or appears to correspond) to the majority of their emissions.¹³ Most companies include in their corporate emissions total the emissions associated with the generation of the electricity they purchase. This means that the emissions from the electricity generation sector cannot simply be added to the emissions. This double counting problem also makes it impossible to assess exactly what proportion of Canada's total emissions these 68 companies are responsible for. See section 3.1 for further discussion of the double counting issue.

Before drawing conclusions from Table 2 about emission trends, it should be noted that the changes from 1997 to 1998 in the electricity and chemicals sectors are dominated in each case by one company. Ontario Hydro's emissions rose by 8.3 Mt from 1997 to 1998—most of the change in the electricity sector—because of the shutdown of nuclear facilities and their replacement by coal-fired generation. And DuPont's emissions fell by 5.1 Mt from 1997 to 1998—almost the entire change in the chemicals sector—because of the installation of new technology to cut emissions of nitrous oxide, a greenhouse gas that is over 300 times more powerful than carbon dioxide and is generated during the production of adipic acid.

¹² Environment Canada, op. cit.

¹³ Imperial Oil, placed in the oil and gas production and refining sector, also produces chemicals; SaskEnergy/TransGas, categorized as a natural gas utility, also has pipeline operations; Westcoast Energy, placed in the pipelines category, is also a natural gas utility and electricity generator. Elf Atochem Canada has been placed in the oil and gas production and refining sector, although it only has oil and gas refining operations; however, its emissions are relatively tiny. All other companies fall clearly into a single category.

Setting aside these two somewhat exceptional changes, most sectors experienced relatively small changes in emissions between 1997 and 1998, in keeping with the one-percent rise in Canada's total emissions. There were small increases in electricity generation (excluding Ontario Hydro) and among pipeline and oil and gas production companies; and small decreases among integrated oil and gas production and refining companies, chemical producers (excluding DuPont) and natural gas utilities. However, there were larger decreases among companies in the forest products and manufacturing sectors; and a relatively large increase among companies in the mining and metals sector.

Between 1990 and 1998, Canada's total emissions rose by 13 percent, and table 2 shows similar increases among integrated oil and gas production and refining companies and companies in the mining and metals sector. Emissions from companies in the electricity generation and oil and gas production sectors rose much more quickly than Canada's total emissions, while emissions from companies in the pipeline sector rose four times more quickly than the national total. Emissions from natural gas utilities were nearly stable, while emissions from companies in the chemicals sector (excluding DuPont) fell by a small amount. The forest products and manufacturing sectors stand out for their large decreases in emissions over this period. However, the group of manufacturing companies included here is too small to be representative of national trends. It should also be noted that much of the reduction in emissions in the forest products sector resulted from the replacement of fossil fuels by fuels derived from wood waste. Under international guidelines,¹⁴ carbon dioxide produced by burning wood waste is assumed to be entirely re-absorbed by growing forests and is therefore not counted in emissions totals. This assumption is questionable in light of the considerable concern that exists as to whether current rates of industrial extraction of wood from Canada's forests are in fact sustainable.

2.3 Emission Changes from 1997-98

Changes in companies' GHG emissions between adjacent years can be influenced by many factors and do not necessarily indicate longer-term emission trends. However, companies with year-on-year emissions increases must accept responsibility for those increases and be prepared to justify them. Companies with emissions decreases can take credit for those decreases if they result from deliberate emission reduction measures. Of the 115 companies reporting 1998 emissions to the VCR, 103 also reported 1997 emissions calculated in a comparable manner. The greatest changes in emissions that occurred between 1997 and 1998 are identified in tables 3-6. Tables 3 and 5 highlight absolute changes, which are most relevant to the impact on the climate. Tables 4 and 6 highlight relative changes, which relate more closely to countries' emission reduction commitments under the Kyoto Protocol (which are expressed as percentages), and draw attention to smaller companies with lower total emissions that are nonetheless changing rapidly.

¹⁴ As established by the Intergovernmental Panel on Climate Change and recommended by the VCR.

Table 3. Companies that made a VCR submission by June 30, 2000 stating their emissions for 1997 and 1998, and whose emissions increased by more than 300 kt CO₂E between those two years.

| Company | Sector | 1998 emissions (kt CO₂E) | 1997 emissions (kt CO₂E) | Change 1997-98 (kt CO₂E) |
|---------------------|-----------------------------------|--------------------------------|--------------------------------|--------------------------------|
| Ontario Hydro | Electricity generation | 31,031 | 22,815 | 8,215 |
| New Brunswick Power | Electricity generation | 9,700 | 8,600 | 1,100 |
| EPCOR | Electricity generation | 8,582 | 7,499 | 1,083 |
| BC Hydro | Electricity generation | 2,007 | 1,244 | 763 |
| Renaissance Energy | Oil and gas production | 2,618 | 1,870 | 748 |
| Manitoba Hydro | Electricity generation | 1,036 | 355 | 681 |
| TransCanada | Pipelines; electricity generation | 17,269 | 16,646 | 623 |
| Suncor Energy | Oil and gas production & refining | 6,160 | 5,678 | 482 |
| Syncrude Canada | Oil and gas production | 8,900 | 8,500 | 400 |
| SaskPower | Electricity generation | 14,707 | 14,366 | 340 |
| Poco Petroleums | Oil and gas production | 889 | 570 | 319 |

Table 4. Companies that made a VCR submission by June 30, 2000 stating their emissions for 1997 and 1998, and whose emissions increased by more than one-quarter between those two years.

| Company | Sector | 1998 emissions (kt CO₂E) | 1997 emissions (kt CO₂E) | % change 1997-98 |
|---------------------------------|------------------------|--------------------------------|--------------------------------|---------------------|
| Genesis Exploration | Oil and gas production | 44 | 10 | 329 |
| Manitoba Hydro | Electricity generation | 1,036 | 355 | 192 |
| Northrock Resources | Oil and gas production | 354 | 123 | 187 |
| Triumph Energy | Oil and gas production | 38 | 21 | 82 |
| BC Hydro | Electricity generation | 2,007 | 1,244 | 61 |
| Poco Petroleums | Oil and gas production | 889 | 570 | 56 |
| Placer Dome North America | Mining and metals | 140 | 95 | 48 |
| Cambior | Mining and metals | 6 | 4 | 47 |
| Startech | Oil and gas production | 85 | 60 | 43 |
| Renaissance Energy | Oil and gas production | 2,618 | 1,870 | 40 |
| Ontario Hydro | Electricity generation | 31,031 | 22,815 | 36 |
| Husky Injection Molding Systems | Manufacturing | 14 | 11 | 31 |
| Talisman Energy | Oil and gas production | 1,146 | 910 | 26 |

Table 5. Companies that made a VCR submission by June 30, 2000 stating their emissions for 1997 and 1998, and whose emissions decreased by more than 300 kt CO₂E between those two years.

| Company | Sector | 1998 emissions (kt CO₂E) | 1997 emissions (kt CO₂E) | Change 1997-98 (kt CO₂E) |
|-----------------------------------|---------------------------------------------------|--------------------------------|--------------------------------|--------------------------------|
| DuPont Canada ^a | Chemicals | 5,387 | 10,443 | -5,056 |
| TransAlta | Electricity generation | 23,359 | 24,096 | -737 |
| Imperial Oil | Oil and gas production and refining; chemicals | 10,830 | 11,450 | -620 |
| ATCO Electric | Electricity generation | 9,500 | 10,096 | -596 |
| Abitibi-Consolidated ^b | Forest products | 1,531 | 2,001 | -471 |
| Ranger Oil | Oil and gas production | 997 | 1,430 | -433 |
| Petro-Canada | Oil and gas production and refining | 6,931 | 7,338 | -407 |
| Shell Canada | Oil and gas production and refining | 7,265 | 7,600 | -335 |

^a Data exclude emissions associated with electricity sold to Ontario Hydro

^b Data appear to exclude emissions associated with some purchased electricity

Table 6. Companies that made a VCR submission by June 30, 2000 stating their
emissions for 1997 and 1998, and whose emissions decreased by more than one-
quarter between those two years.

| Company | Sector | 1998 emissions (kt CO₂E) | 1997 emissions (kt CO₂E) | % change 1997-98 |
|-----------------------------------------|------------------------|--------------------------------|--------------------------------|---------------------|
| DuPont Canada ^a | Chemicals | 5,387 | 10,443 | -48 |
| Pacifica Papers | Forest products | 261 | 379 | -31 |
| Ranger Oil | Oil and gas production | 997 | 1,430 | -30 |
| Conoco Canada | Oil and gas production | 81 | 113 | -28 |
| Kimberly-Clark Nova Scotia ^b | Forest products | 65 | 89 | -27 |

^a Data exclude emissions associated with electricity sold to Ontario Hydro

^b Data exclude emissions associated with purchased electricity

Although what counts for protecting the climate is reducing emissions, emissions intensity (emissions per unit of production) is a good indicator of how much effort companies are making to lessen their impact on the climate, independent of whether their level of commercial activity is rising or falling. Of the 115 companies reporting 1998 emissions to the VCR, 88 also reported their 1997 emissions as well as the production figures for both years that are necessary to calculate emissions intensities. Tables 7 and 8 show respectively the worst and best performers in terms of emissions intensity.¹⁵

¹⁵ Where companies have more than one product, the emissions intensity has calculated for the product that has the highest absolute level of associated emissions.

Table 7. Companies that made a VCR submission by June 30, 2000 stating their emissions and production for 1997 and 1998, and whose emissions intensity increased by more than 10% between those two years.

| Company | Sector | 1998 emissions (kt CO₂E) | % change in emissions intensity 1997-98 |
|-----------------------------------|-----------------------------------|--------------------------------|--------------------------------------------------|
| Manitoba Hydro | Electricity generation | 1,036 | 230 |
| Northrock Resources | Oil and gas production | 354 | 141 |
| Genesis Exploration | Oil and gas production | 44 | 102 |
| BC Hydro | Electricity generation | 2,007 | 62 |
| Ontario Hydro | Electricity generation | 31,031 | 40 |
| Renata Resources | Oil and gas production | 58 | 37 |
| Newport Petroleum | Oil and gas production | 215 | 28 |
| Placer Dome North America | Mining and metals | 140 | 25 |
| Daishowa, Division de Québec | Forest products | 134 | 12 |
| Alberta Energy | Oil and gas production; pipelines | 2,277 | 11 |
| Weldwood of Canada | Forest products | 370 | 11 |
| Abitibi-Consolidated ^a | Forest products | 1,531 | 10 |

^a Data appear to exclude emissions associated with some purchased electricity

Table 8. Companies that made a VCR submission by June 30, 2000 stating their emissions and production for 1997 and 1998, and whose emissions intensity decreased by more than 10% between those two years.

| Company | Sector | 1998 emissions (kt CO₂E) | % change in emissions intensity 1997-98 |
|--------------------------------------------------|------------------------------------------------|--------------------------------|--------------------------------------------------|
| DuPont Canada ^a | Chemicals | 5,387 | -46 |
| Elf Atochem Canada - Oakville plant | Oil and gas refining | 1 | -33 |
| Pacifica Papers | Forest products | 261 | -26 |
| Encal Energy ^b | Oil and gas production | 241 | -24 |
| Star Oil & Gas | Oil and gas production | 170 | -23 |
| Poco Petroleums | Oil and gas production | 889 | -19 |
| Startech | Oil and gas production | 85 | -18 |
| Mobil Canada | Oil and gas production | 1,636 | -18 |
| Orenda Aerospace | Manufacturing | 8 | -18 |
| PrimeWest Energy | Oil and gas production | 170 | -17 |
| St. Lawrence Corp. | Manufacturing | 7 | -17 |
| Murphy Oil | Oil and gas production | 628 | -17 |
| Dow Chemical Canada | Chemicals | 2,239 | -17 |
| Bayer Rubber Division - Sarnia Site ^c | Chemicals | 418 | -16 |
| Imperial Oil | Oil and gas production and refining; chemicals | 10,830 | -14 |
| Paramount Resources ^d | Oil and gas production | 348 | -13 |
| Spruce Falls ^b | Forest products | 82 | -11 |
| Ranger Oil | Oil and gas production | 997 | -11 |
| NOVA Chemicals ^b | Chemicals | 3,827 | -10 |

^a Data exclude emissions associated with electricity sold to Ontario Hydro
 ^b Data exclude emissions associated with purchased electricity
 ^c It is unclear whether data include emissions associated with purchased electricity

^d Data appear to exclude emissions associated with purchased electricity

2.4 Emission Changes from 1990-98

The year 1990 is the standard baseline year against which GHG emission reduction efforts are compared, notably those mandated by the Kyoto Protocol. Changes in companies' emissions between 1990 and 1998 indicate medium-term emission trends and are a more reliable measure of companies' climate protection performance than the year-on-year changes reported in section 2.3. As noted in section 2.2, of the 115 companies reporting 1998 emissions to the VCR, 71 also reported their 1990 emissions calculated in a comparable manner. The greatest changes in emissions that occurred between 1990 and 1998 are identified in tables 9-12. Tables 9 and 11 highlight absolute changes, which are most relevant to the impact on the climate. Tables 10 and 12 highlight relative changes, which relate more closely to countries' emission reduction commitments under the Kyoto Protocol (which are expressed as percentages), and draw attention to smaller companies with lower total emissions that have nonetheless changed significantly.

| Table 9. Companies that made a VCR submission by June 30, 2000 stating their |
|------------------------------------------------------------------------------|
| emissions for 1990 and 1998, and whose emissions increased by more than 500 |
| kt CO ₂ E between those two years. |

| Company | Sector | 1998 emissions (kt CO₂E) | 1990 emissions (kt CO₂E) | Change 1990-98 (kt CO₂E) |
|----------------------------------------------------------|--------------------------------------------------------|--------------------------------|--------------------------------|--------------------------------|
| TransCanada | Pipelines; electricity generation | 17,269 | 10,396 | 6,873 |
| EPCOR | Electricity generation | 8,582 | 3,450 | 5,132 |
| Ontario Hydro | Electricity generation | 31,031 | 26,000 | 5,031 |
| SaskPower | Electricity generation | 14,707 | 10,585 | 4,122 |
| New Brunswick Power | Electricity generation | 9,700 | 6,300 | 3,400 |
| Husky Oil Operations | Oil and gas production and refining | 6,483 | 3,804 | 2,679 |
| ATCO Electric | Electricity generation | 9,500 | 7,746 | 1,754 |
| Syncrude Canada | Oil and gas production | 8,900 | 7,220 | 1,680 |
| Suncor Energy | Oil and gas production and refining | 6,160 | 4,969 | 1,191 |
| BC Hydro | Electricity generation | 2,007 | 863 | 1,144 |
| Nova Scotia Power | Electricity generation | 7,969 | 6,830 | 1,139 |
| Westcoast Energy ^a | Pipelines; natural gas utility; electricity generation | 5,218 | 4,141 | 1,077 |
| Canadian Occidental Petroleum Oil and Gas Division | Oil and gas production | 2,980 | 2,300 | 680 |
| Agrium ^b | Chemicals | 2,851 | 2,291 | 560 |
| Manitoba Hydro | Electricity generation | 1,036 | 525 | 511 |

^a Data probably include emissions associated with purchased electricity but this is not stated explicitly in the company's submission

^b Data appear to exclude emissions associated with purchased electricity

Table 10. Companies that made a VCR submission by June 30, 2000 stating their emissions for 1990 and 1998, and whose emissions increased by more than one-third between those two years.

| Company | Sector | 1998 emissions (kt CO₂E) | 1990 emissions (kt CO₂E) | % change 1990-98 |
|-------------------------------------------------------|-------------------------------------|--------------------------------|--------------------------------|---------------------|
| Enbridge Pipelines (Saskatchewan) | Pipelines | 34 | 14 | 151 |
| EPCOR | Electricity generation | 8,582 | 3,450 | 149 |
| BC Hydro | Electricity generation | 2,007 | 863 | 133 |
| EOG Resources | Oil and gas production | 178 | 77 | 131 |
| Manitoba Hydro | Electricity generation | 1,036 | 525 | 97 |
| Husky Injection Molding Systems | Manufacturing | 14 | 7 | 96 |
| Murphy Oil | Oil and gas production | 628 | 366 | 72 |
| Husky Oil Operations | Oil and gas production and refining | 6,483 | 3,804 | 70 |
| TransCanada | Pipelines; electricity generation | 17,269 | 10,396 | 66 |
| New Brunswick Power | Electricity generation | 9,700 | 6,300 | 54 |
| Stora Enso Port Hawkesbury ^a | Forest products | 246 | 163 | 51 |
| Potash Corporation of Saskatchewan, Allan Division | Mining and metals | 147 | 101 | 45 |
| SaskPower | Electricity generation | 14,707 | 10,585 | 39 |

^a Data exclude emissions associated with purchased electricity

Table 11. Companies that made a VCR submission by June 30, 2000 stating their emissions for 1990 and 1998, and whose emissions decreased by more than 500 kt CO₂E between those two years.

| Company | Sector | 1998 emissions (kt CO₂E) | 1990 emissions (kt CO₂E) | Change 1990-98 (kt CO₂E) |
|---------------------------------|------------------------|--------------------------------|--------------------------------|--------------------------------|
| DuPont Canada ^a | Chemicals | 5,387 | 11,239 | -5,852 |
| TransAlta | Electricity generation | 23,359 | 25,827 | -2,468 |
| Newfoundland and Labrador Hydro | Electricity generation | 1,051 | 1,620 | -569 |

^a Data exclude emissions associated with electricity sold to Ontario Hydro

Table 12. Companies that made a VCR submission by June 30, 2000 stating their emissions for 1990 and 1998, and whose emissions decreased by more than one-third between those two years.

| Company | Sector | 1998 emissions (kt CO₂E) | 1990 emissions (kt CO₂E) | % change 1990-98 |
|--------------------------------------|------------------------|--------------------------------|--------------------------------|---------------------|
| Elf Atochem Canada - Oakville plant | Oil and gas refining | 1 | 2 | -59 |
| DuPont Canada ^a | Chemicals | 5,387 | 11,239 | -52 |
| Pacifica Papers | Forest products | 261 | 520 | -50 |
| Solutia Canada ^b | Chemicals | 9 | 17 | -47 |
| Spruce Falls ^c | Forest products | 82 | 152 | -46 |
| Conoco Canada | Oil and gas production | 81 | 144 | -44 |
| General Motors of Canada | Manufacturing | 695 | 1,131 | -39 |
| Newfoundland and Labrador Hydro | Electricity generation | 1,051 | 1,620 | -35 |
| Donohue Forest Products ^c | Forest products | 379 | 576 | -34 |

^a Data exclude emissions associated with electricity sold to Ontario Hydro

^b Data appear to exclude emissions associated with purchased electricity

^c Data exclude emissions associated with purchased electricity

Although what counts for protecting the climate is reducing emissions, emissions intensity (emissions per unit of production) is a good indicator of how much effort companies are making to lessen their impact on the climate, independent of whether their level of commercial activity is rising or falling. Of the 115 companies reporting 1998 emissions to the VCR, 58 also reported their 1990 emissions as well as the production figures for both years that are necessary to calculate emissions intensities. Tables 13 and 14 show the worst and best performers in terms of emissions intensity.¹⁶ Table 14 uses a four-percent average annual reduction in emissions intensity as a cutoff. This is roughly the rate of reduction in emissions intensity that Canada's economy as a whole needs to achieve to meet our commitment under the Kyoto Protocol through domestic emission reductions.¹⁷

¹⁶ Where companies have more than one product, the emissions intensity has calculated for the product that has the highest absolute level of associated emissions.

¹⁷ National Climate Change Process Analysis and Modelling Group, *op. cit.*, p.59.

Table 13. Companies that made a VCR submission by June 30, 2000 stating their emissions and production for 1990 and 1998, and whose emissions intensity increased between those two years.

| Company | Sector | 1998 emissions (kt CO₂E) | % change in emissions intensity 1990-98 |
|-----------------------------------------|------------------------------------------------|--------------------------------|--------------------------------------------------|
| Elf Atochem Canada - Oakville plant | Oil and gas refining | 1 | 272 |
| Placer Dome North America | Mining and metals | 140 | 177 |
| BC Hydro | Electricity generation | 2,007 | 106 |
| Stora Enso Port Hawkesbury ^a | Forest products | 246 | 43 |
| Chevron Canada Resources | Oil and gas production | 1,548 | 34 |
| Manitoba Hydro | Electricity generation | 1,036 | 30 |
| Murphy Oil | Oil and gas production | 628 | 20 |
| Enbridge Pipelines | Pipelines | 1,110 | 16 |
| Imperial Oil | Oil and gas production and refining; chemicals | 10,830 | 14 |
| Canadian Hunter Exploration | Oil and gas production | 473 | 12 |
| SaskPower | Electricity generation | 14,707 | 9 |
| Weyerhaeuser Canada | Forest products | 201 | 5 |
| Pine Falls Paper | Forest products | 143 | 4 |
| Nova Scotia Power | Electricity generation | 7,969 | 3 |
| Abitibi-Consolidated ^b | Forest products | 1,531 | 1 |
| TransCanada | Pipelines; electricity generation | 17,269 | 1 |

^a Data exclude emissions associated with purchased electricity

^b Data appear to exclude emissions associated with some purchased electricity

Table 14. Companies that made a VCR submission by June 30, 2000 stating their emissions and production for 1990 and 1998, and whose emissions intensity decreased between those two years at an average rate of more than 4% per year (i.e., by more than 32% in total).

| Company | Sector | 1998 emissions (kt CO₂E) | % change per year in emissions intensity 1990-98 |
|--------------------------------------|------------------------|-----------------------------|-----------------------------------------------------------|
| DuPont Canada ^a | Chemicals | 5,387 | -8.1 |
| Husky Injection Molding Systems | Manufacturing | 14 | -7.9 |
| Dow Chemical Canada | Chemicals | 2,239 | -7.2 |
| Spruce Falls ^b | Forest products | 82 | -6.3 |
| Donohue Forest Products ^b | Forest products | 379 | -6.0 |
| Nexfor ^c | Forest products | 592 | -5.5 |
| General Motors of Canada | Manufacturing | 695 | -5.2 |
| Weldwood of Canada | Forest products | 370 | -5.0 |
| Pacifica Papers | Forest products | 261 | -4.7 |
| Newfoundland and Labrador Hydro | Electricity generation | 1,051 | -4.2 |

^a Data exclude emissions associated with electricity sold to Ontario Hydro

^b Data exclude emissions associated with purchased electricity

^c It is not entirely clear whether data include emissions associated with purchased electricity

3. Data Quality

An important drawback of voluntary reporting of emissions, as solicited by the VCR, is that there is no requirement for companies to use a standard method of calculating emissions data, nor that they even provide clear explanations of how data were calculated. The VCR does offer guidance to participants but it is not comprehensive and is often not followed.¹⁸

We have encountered the following variations in the methodology used by companies in calculating the emissions they report to the VCR. They are in no particular order.

- Some companies report emissions from facilities they own, while others report emissions from facilities they operate (but do not necessarily wholly own).
- Some companies arbitrarily exclude certain of their facilities from their emissions calculations.
- Most companies include in their emissions total the emissions associated with the generation of the electricity they purchase, but some do not. In the case of electricity producers, it is often not clear how purchases from or sales to other electricity producers have been treated.
- A few companies use non-standard global warming potentials (GWPs) to calculate the carbon dioxide equivalent (CO₂E) amount of gases other than carbon dioxide.
- There are wide discrepancies in the kinds of activities included in emissions calculations. Some companies include emissions associated with their buildings, vehicles and other mobile equipment, and private landfills; many do not.
- Some companies do not report emissions of methane and nitrous oxide, and many companies do not consider emissions of the other three gases covered under the Kyoto Protocol.¹⁹
- Some companies do not report data for previous years, preventing an assessment of trends. With little justification, several companies have adopted a base year other than 1990, which is the standard. A few companies report emissions for fiscal rather than calendar years.
- Some companies report their emissions or production data only in graphical form, as changes in percentage, or in terms of emissions intensity.
- There are wide variations in the types of GHG offsets (emission reductions or enhancements to GHG "sinks" realized outside the company's normal operations) that companies subtract from their internal emissions. VCR submissions typically provide scant details of offsets and of how they have been quantified. In some cases it is impossible to tell whether an emissions reduction has been achieved inside or outside a company's operations and, in some such cases, the reduction appears to have been counted twice. In addition, there is currently no government-sanctioned certification of offsets. The Pembina Institute therefore makes no assumptions about the quality and credibility of the offsets that have been subtracted from companies' internal emissions in this study. Offsets are further discussed below.
- Some companies adjust their data for previous years by including acquisitions and excluding dispositions made subsequent to those respective years; others do not.²⁰

¹⁸ Even when companies follow international guidelines for reporting GHG emissions, the results can be questionable. Most notably, carbon dioxide produced by burning wood waste is assumed to be entirely reabsorbed by growing forests and is therefore not counted in emissions totals. Yet considerable concern exists as to whether current rates of industrial extraction of wood from Canada's forests are in fact sustainable.
¹⁹ Perfluorocarbons, hydrofluorocarbons and sulphur hexafluoride.

²⁰ Such an adjustment is desirable and helps to clarify emissions trends, because adjusted data for all years apply to the company's *current* operations, even if the company's actual operations were different in the past. Emissions from sold operations should be accounted for by the new owners.

- However, some companies make so many adjustments to their actual internal emissions to account for acquisitions, dispositions, offsets and so on, without clearly documenting them, that it becomes impossible to tell what their actual internal emissions are.
- Companies frequently do not provide production data needed to calculate emissions intensity (emissions per unit of production), a key indicator of how much effort they are making to lessen their impact on the climate.
- Companies with more than one product sometimes fail to report the emissions associated with each product, thereby preventing calculation of a meaningful emissions intensity.
- Companies in the same industrial sector often use different and irreconcilable measures of production, preventing a comparison of their emissions intensities.

The fact that this lengthy catalogue of inconsistencies still exists five years after the VCR program was launched clearly indicates that voluntary reporting of GHG emissions cannot provide information about company-specific emissions at an adequate level of data quality. It is obvious that mandatory reporting is needed.

Since mandatory reporting does not yet exist, we have attempted to partially correct for some of these inconsistencies and generally ensure the best possible data quality in the circumstances by adopting the following guidelines when compiling the results presented in section 2.

- If a company's VCR submission reporting 1998 data does not contain data calculated in a comparable manner for the years 1990 or 1997, we have attempted to obtain it from previous VCR submissions.
- Where companies have used non-standard global warming potentials (GWPs) for gases other than carbon dioxide, we have replaced them by the standard GWPs²¹ wherever emissions are disaggregated by gas.
- Where a company possesses GHG offsets (emission reductions or enhancements to GHG "sinks" realized outside the company's normal operations), we have calculated emissions by subtracting claimed offsets from the internal emissions stated in (or deduced from) the submission.²² In no particular order, offsets that we have subtracted include: sales of flyash for use in cement production; tree planting; landfill gas capture; avoided landfilling of wood waste; composting; recycling; mine land reclamation; agricultural soil enhancement; measures to reduce methane emissions from livestock; and gas-fired cogeneration that displaces coal-fired electricity generation. Very rarely, we excluded an offset, for example, when it was based on rejecting standard GWP values. Table 15 lists the companies that most heavily relied on offsets in 1998.

²¹ As established by the Intergovernmental Panel on Climate Change and recommended by the VCR.

²² VCR submissions typically provide scant details of offsets. In addition, there is currently no governmentsanctioned certification of offsets. The Pembina Institute therefore makes no assumptions about the quality and credibility of the offsets we have subtracted from companies' internal emissions in this study.

Table 15. Companies that made a VCR submission by June 30, 2000 stating their emissions for 1998, and which possessed offsets that we subtracted from their internal 1998 emissions exceeding 1% of those internal emissions.

| Company | Sector | 1998 net emissions after subtracting offsets (kt CO ₂ E) | Total offsets subtracted (kt CO ₂ E) | Offsets as % of internal emissions |
|------------------------------------|--------------------------------------------------------|------------------------------------------------------------------------------|-------------------------------------------------------|------------------------------------------|
| Husky Injection Molding Systems | Manufacturing | 14 | 9 | 38 |
| Westcoast Energy | Pipelines; natural gas utility; electricity generation | 5,218 | 571 | 10 |
| TransAlta | Electricity generation | 23,359 | 1,663 | 7 |
| EPCOR | Electricity generation | 8,582 | 259 | 3 |
| Nova Scotia Power | Electricity generation | 7,969 | 86 | 1 |

Note: Ontario Hydro's submission states only gross emissions for 1998 (31,031 kt CO_2E), but it describes several offset projects that are expected to amount to 2,400 kt CO_2E in 2000; it is not clear what proportion of these offsets were active in 1998.

3.1 Double Counting of Emissions

The issue of GHG offsets raises the problem of double counting of emissions and emission reductions. If a coal-fired electricity producer sells flyash as a lime substitute to a cement producer, allowing the cement producer to reduce its emissions, which of them "owns" the emission reduction? If the reduction is both assigned to the former as an offset and to the latter as an internal emission reduction, then it has been counted twice. Or if a natural gas supplier generates electricity using highly efficient gas-fired cogeneration, displacing electricity generated in a much more GHG-intense manner from coal, should the reduction be assigned to the former as an offset or to the latter as an internal emission reduction? Currently, there is widespread double counting, amounting to disputed "ownership" of these kinds of emission reductions. In the case of some of the actions of electricity producers to reduce their customers' consumption, the resulting emission reductions appear to have been counted twice by the *same* company—once as a reduction in the company's internal emissions, and a second time as an offset.

The most significant form of double counting among companies reporting emissions to the VCR relates not to offsets but to the fact that most companies include in their corporate emissions total the emissions associated with the generation of the electricity they purchase. These emissions are counted once by the company purchasing the electricity and once by the electricity producer. This is usually accepted to be a desirable convention since it encourages companies to reduce their consumption of energy from all sources.

However, all double counting undermines the mathematical integrity of emissions reporting and exaggerates (by counting twice) the real impact of emissions reductions on the climate. If and when a dollar value is placed on emissions—for example, by a future domestic emissions trading system—an emissions accounting system will need to be in place that includes clear and sensible rules for how to account for and allocate emission reductions. Such an accounting system should be introduced via mandatory emissions reporting.

Availability of Company-Specific GHG Emissions Data 4.

Presently, the only organized source of Canadian company-specific GHG emissions data is the website of the Voluntary Challenge and Registry (VCR) program.²³ The government of Québec's ÉcoGESte program,²⁴ which, like the VCR, encourages voluntary action to reduce emissions by corporations, provides no mechanism for public access to participating companies' submissions, many of which are subject at least in part to confidentiality agreements between the government and the companies.²⁵ Although there are plans to publish some company-specific ÉcoGESte data,²⁶ the program remains for the moment essentially a private discussion between bureaucrats and company employees.

This study of VCR submissions and our previous one²⁷ show that, overall, the level of meaningful participation of Canada's major industrial greenhouse gas emitters in the VCR program is inadequate and showing no signs of improving significantly.

- Of the companies that made a VCR submission by June 30, 2000 stating their emissions for 1998, total emissions for that year were 109.1 Mt CO₂E for the 11 electricity producers, and 131.0 Mt CO₂E for the other 104 companies. These two numbers cannot straightforwardly be added since the latter figure includes a substantial amount of emissions associated with electricity generation that have already been included in the former figure. However, by adding the two we obtain an upper bound for emissions associated with VCR participants who have reported their 1998 emissions: 240 Mt. In section 1.1, we saw that industrial stationary sources (including electricity generation) directly accounted for 51 percent of Canada's GHG emissions in 1998; if emissions from heavy duty and off road vehicles, domestic marine and rail transportation are included—on the grounds that these modes of transportation are used overwhelmingly by industrial operations and to take industrial products to market-the proportion rises to 61 percent. This figure still excludes emissions from commercial buildings and agribusiness, both of which arguably fall under the heading "industry." Yet our upper bound for the emissions of VCR participants who have reported their 1998 emissions is only 35 percent of Canada's total emissions (692 Mt in 1998). We can therefore conclude that companies that are participating meaningfully in the VCR likely represent no more than half of Canada's industrial GHG emissions, and possibly somewhat less than half.
- One hundred companies made a VCR submission during 1998 (12-month period) stating their emissions for 1997;²⁸ in the current study we have found that 115 companies made a VCR submission by June 30, 2000 (18-month period) stating their emissions for 1998. This is not a significant increase, given the extra six months allowed in this study for companies to report to the VCR. In addition, at the time this study was being conducted, the VCR was claiming over 700 organizations with "Action Plans registered." Five years after the VCR was launched, only about one-sixth of participants are managing to take the basic step of reporting their emissions.

²³ http://www.vcr-mvr.ca/AlphaList.cfm.

 ²⁴ http://www.menv.gouv.qc.ca/air/changement/ecogeste.htm.
 ²⁵ Roberte Robert, Ministère de l'Environnement du Québec, personal communication.

²⁶ Roberte Robert, *op. cit.*

²⁷ Robert Hornung and Matthew Bramley, *op. cit.*

²⁸ Our report *Five Years of Failure...* (see footnote 4), covering 1997 emissions, lists 106 companies. However, two companies that should have been included escaped our attention (Daishowa, Division de Québec, and Tembec), and we unwittingly included eight companies who made VCR submissions in early 1999 stating 1997 emissions.

- Some of Canada's largest GHG emitters do not report their emissions to the VCR. No companies at all from the aluminum, cement, and iron and steel sectors made VCR submissions by June 30, 2000 stating their emissions for 1998. Yet in 1997 (the most recent year for which full Canadian inventory data is available²⁹), emissions in Canada from aluminum production were 10 Mt CO₂E; emissions from cement, lime and soda ash production over 8 Mt, and emissions from iron and steel production also 8 Mt. These figures are for process emissions only and do not include fuel combustion, which is likely to account for many additional megatonnes. In the chemicals sector, only six companies reported their 1998 emissions to the VCR. Most of the others simply submitted the Canadian Chemical Producers' Association report, *Reducing Emissions*, which provides no company-specific emissions data.
- Several major Canadian companies with substantial GHG emissions reported their 1997 emissions to the VCR but then failed to report their 1998 emissions (see table 16).

Table 16. Canadian companies that made a VCR submission stating 1997 emissions exceeding 500 kt CO₂E but did not make a VCR submission by June 30, 2000 stating their emissions for 1998.

| Company | Sector | 1997 emissions (kt CO ₂ E) ³⁰ |
|----------------------------|------------------------|--------------------------------------------------------|
| Canadian Natural Resources | Oil and gas production | 2,593 |
| Celanese Canada | Chemicals | 1,448 |
| Dofasco | Iron and steel | 4,376 |
| Domtar | Forest products | 504 |
| Gulf Canada Resources | Oil and gas production | 2,381 |
| Methanex | Chemicals | 1,070 |
| Noranda | Mining and metals | 741 |
| Shell Chemicals Canada | Chemicals | 458 |
| St. Lawrence Cement | Cement | 1,669 |
| Teck | Mining and metals | 659 |

The analysis presented in this section clearly indicates that voluntary reporting cannot provide information about an adequate proportion of company-specific industrial GHG emissions in Canada. Mandatory reporting is obviously needed.

 ²⁹ Neitzert, F., K. Olsen and P. Collas (1999), *Canada's Greenhouse Gas Inventory: 1997 emissions and removals with trends*, Environment Canada. Available at http://www.ec.gc.ca/press/ghg_m_e.htm.
 ³⁰ Data taken from Robert Hornung and Matthew Bramley, *op. cit*.

Appendix. All 115 companies who, by June 30, 2000, made a VCR submission stating their emissions for 1998.

The following table summarizes all the data gathered in this study. Some of the more significant qualifications are made in the notes at the end of the table, but it has not been possible to list here in their entirety the many quirks and variations of the data for individual companies. The most significant of these relate to: exclusion of certain facilities from a company's emissions; treatment of GHG offsets; and adjustment of data for acquisitions and dispositions. See section 3 for a discussion of these issues. We have also not reproduced production data here, except indirectly via emissions intensity changes. Please contact the Pembina Institute if you are interested in gaining access to the complete database from which this table has been drawn.

Except for the column specifying base years, blank spaces in the table indicate that data were not available in a company's VCR submissions, or could not be calculated because data were missing from those submissions.

| Company | Sector | 1998 | 1997 | Base year | Base | | | | | | Change in |
|--------------------------------------------------|--------------------------------------|------------------------|------------------------|------------------------|-------------|------------------------|---------|----------------------|------------------------|--------------------|------------------------|
| | | emissions | | emissions | year if | | | | | | |
| | | (kt CO ₂ E) | (kt CO ₂ E) | (kt CO ₂ E) | not 1990 | 1997-98 | 1997-98 | intensity 1997-98 | base year -1998 | base year -1998 | intensity |
| | | | | | 1990 | (kt CO ₂ E) | (%) | (%) | (kt CO ₂ E) | (%) | base year -1998 (%) |
| 3M Canada | Manufacturing | 58 | 59 | 60 | | -2 | -3 | | -2 | -4 | |
| Abitibi-Consolidated ^a | Forest products | 1,531 | 2,001 | 1,998 | | -471 | -24 | 10 | -468 | -23 | 1 |
| Agrium ^b | Chemicals | 2,851 | 2,905 | 2,291 | | -54 | -2 | -5 | 560 | 24 | -8 |
| Alberta Energy | Oil and gas production; pipelines | 2,277 | 2,035 | 1,214 | 1994 | 242 | 12 | 11 | 1,063 | 88 | -9 |
| Amber Energy | Oil and gas production | 527 | | | 1998 | | | | | | |
| Amoco Canada Petroleum | Oil and gas production | 6,639 | | 6,263 | | | | | 376 | 6 | |
| Anderson Exploration | Oil and gas production | 2,060 | 1,875 | 1,735 | 1994 | 185 | 10 | 6 | 325 | 19 | 7 |
| ATCO Electric | Electricity generation | 9,500 | 10,096 | 7,746 | | -596 | -6 | -6 | 1,754 | 23 | -2 |
| ATCO Gas | Natural gas utility | 437 | 476 | 461 | | -38 | -8 | -8 | -24 | -5 | -5 |
| ATCO Pipelines | Pipelines | 199 | | 149 | | | | | 50 | 33 | -2 |
| Battle Mountain Canada - Golden Giant Mine | Mining and metals | 31 | 31 | 29 | | 0 | -1 | | 2 | 8 | |
| Bayer Rubber Division - Sarnia Site ^c | Chemicals | 418 | 517 | 522 | | -99 | -19 | -16 | -104 | -20 | -25 |
| BC Gas Utility | Natural gas utility | 196 | 198 | 172 | | -3 | -1 | -6 | 24 | 14 | -13 |
| BC Hydro | Electricity generation | 2,007 | 1,244 | 863 | | 763 | 61 | 62 | 1,144 | 133 | 106 |
| Bison Transport | Freight transport | 84 | 70 | 64 | 1996 | 14 | 19 | | 20 | 30 | |
| Cabre Exploration | Oil and gas production | 150 | | | 1998 | | | | | | |
| Cambior | Mining and metals | 6 | 4 | 2 | 1995 | 2 | 47 | | 4 | 163 | |

| Company | Sector | 1998 emissions (kt CO ₂ E) | 1997 emissions (kt CO ₂ E) | Base year emissions (kt CO ₂ E) | Base year if not 1990 | Change in emissions 1997-98 (kt CO ₂ E) | Change in emissions 1997-98 (%) | Change in emissions intensity 1997-98 (%) | Change in emissions base year -1998 (kt CO ₂ E) | Change in emissions base year -1998 (%) | Change in emissions intensity base year -1998 (%) |
|--------------------------------------------------|----------------------------------------------------------|---------------------------------------------|---------------------------------------------|--------------------------------------------------|--------------------------------|-------------------------------------------------------------|------------------------------------------|-------------------------------------------------------|------------------------------------------------------------------------|-----------------------------------------------------|---------------------------------------------------------------|
| Canadian Hunter Exploration | Oil and gas production | 473 | 501 | 406 | | -27 | -5 | , , | (nt 002E) 67 | 17 | 1000 (70) |
| Canadian Occidental Petroleum Oil & Gas Division | Oil and gas production | 2,980 | | | | 155 | 5 | -3 | 680 | | |
| Canlan Ice Sports | Leisure services | 12 | 10 | 6 | 1994 | 2 | 17 | -2 | 6 | 97 | -38 |
| Canor Energy | Oil and gas production | 33 | | | 1998 | | | | | | |
| Chevron Canada Resources | Oil and gas production | 1,548 | 1,629 | 1,433 | | -81 | -5 | 6 | 115 | 8 | 34 |
| Cominco | Mining and metals | 304 | | 458 | 1989 | 6 | 2 | -4 | -154 | -34 | -32 |
| Conoco Canada | Oil and gas production | 81 | 113 | 144 | | -32 | -28 | | -63 | -44 | |
| Crestar Energy | Oil and gas production | 1,743 | 1,685 | 1,185 | 1994 | 58 | 3 | -5 | 558 | 47 | -14 |
| Crestbrook Forest Industries | Forest products | 198 | 197 | 226 | | 1 | 1 | 4 | -28 | -12 | -28 |
| Daishowa, Division de Québec | Forest products | 134 | 123 | 170 | | 11 | 9 | 12 | -36 | -21 | -5 |
| Donohue Forest Products ^d | Forest products | 379 | 399 | 576 | | -20 | -5 | -6 | -197 | -34 | -48 |
| Dow Chemical Canada | Chemicals | 2,239 | 2,271 | 2,622 | | -32 | -1 | -17 | -383 | -15 | -57 |
| DuPont Canada ^e | Chemicals | 5,387 | 10,443 | 11,239 | | -5,056 | -48 | -46 | -5,852 | -52 | -65 |
| Elf Atochem Canada - Oakville plant | Oil and gas refining | 1 | 1 | 2 | | 0 | -20 | -33 | -1 | -59 | 272 |
| Enbridge Consumers Gas | Natural gas utility | 354 | 365 | 440 | | -11 | -3 | -5 | -86 | -20 | -28 |
| Enbridge Pipelines | Pipelines | 1,110 | 1,131 | 895 | | -21 | -2 | -1 | 215 | 24 | 16 |
| Enbridge Pipelines (Saskatchewan) | Pipelines | 34 | 34 | 14 | | 0 | 0 | 6 | 21 | 151 | -9 |
| Encal Energy ^d | Oil and gas production | 241 | 269 | 181 | 1994 | -28 | -10 | -24 | 60 | 33 | -39 |
| EOG Resources | Oil and gas production | 178 | 170 | 77 | | 8 | 5 | -4 | 101 | 131 | -12 |
| EPCOR | Electricity generation | 8,582 | 7,499 | 3,450 | | 1,083 | 14 | | 5,132 | 149 | |
| Falconbridge | Mining and metals | 672 | 630 | 605 | | 42 | 7 | 0 | 67 | 11 | -10 |
| Federated Co-operatives | Oil and gas refining; freight transport; forest products | 1,108 | 1,057 | 1,021 | 1994 | 51 | 5 | | 87 | 9 | |
| Fletcher Challenge Energy Canada ^f | Oil and gas production | 502 | 504 | 149 | JUL90- JUN91 | -2 | 0 | -6 | 352 | 236 | -32 |
| Ford Motor Company of Canada | Manufacturing | 553 | 683 | 604 | 1995 | -130 | -19 | 1 | -51 | -8 | -15 |
| Gaz Métropolitain ^d | Natural gas utility | 152 | 154 | 158 | | -1 | -1 | | -6 | -4 | -14 |
| General Motors of Canada | Manufacturing | 695 | 770 | 1,131 | | -74 | -10 | 8 | -435 | -39 | -42 |
| Genesis Exploration | Oil and gas production | 44 | 10 | 10 | 1997 | 34 | 329 | 102 | 34 | 329 | 102 |
| Husky Injection Molding Systems | Manufacturing | 14 | 11 | 7 | | 3 | 31 | 0 | 7 | 96 | -63 |
| Husky Oil Operations | Oil and gas production and refining | 6,483 | 6,450 | 3,804 | | 33 | 1 | | 2,679 | 70 | |
| IBM Canada | Manufacturing | 73 | 89 | 101 | 1995 | -16 | -18 | | -28 | -28 | |
| Imperial Oil | Oil and gas production and refining; chemicals | 10,830 | 11,450 | 10,845 | | -620 | -5 | -14 | -15 | 0 | 14 |

| Company | Sector | 1998 emissions | 1997 emissions | Base year emissions | Base year if | Change in emissions | | Change in emissions | Change in emissions | Change in emissions | Change in emissions |
|------------------------------------------|--------------------------------------|------------------------|------------------------|------------------------|-----------------------|-----------------------------------|----------------|-----------------------------|----------------------------------------------|---------------------------|-------------------------------------|
| | | (kt CO ₂ E) | (kt CO ₂ E) | (kt CO ₂ E) | not 1990 | 1997-98 (kt CO ₂ E) | 1997-98 (%) | intensity 1997-98 (%) | base year -1998 (kt CO ₂ E) | base year -1998 (%) | intensity base year -1998 (%) |
| Imperital Tobacco Canada | Manufacturing | 41 | | | 1998 | | | (70) | (Kt 002L) | (70) | -1000 (70) |
| Inco | Mining and metals | 942 | 876 | 998 | | 66 | 8 | 5 | -56 | -6 | -7 |
| Kimberly-Clark Nova Scotia ^d | Forest products | 65 | 89 | 90 | | -24 | -27 | | -25 | -28 | |
| Koch Oil | Oil and gas production; pipelines | 311 | | 680 | 1995 | | | | -370 | -54 | -32 |
| Kodak Canada | Manufacturing | 30 | 32 | 34 | | -2 | -7 | | -4 | -13 | |
| Kraft Canada | Manufacturing | 89 | 90 | 99 | 1996 | -2 | -2 | | -11 | -11 | |
| Kruger | Forest products | 564 | 530 | 623 | | 34 | 6 | 2 | -59 | -9 | -31 |
| Luscar | Mining and metals | 1,055 | 1,063 | 902 | | -8 | -1 | 3 | 154 | 17 | -2 |
| Manitoba Hydro | Electricity generation | 1,036 | 355 | 525 | | 681 | 192 | 230 | 511 | 97 | 30 |
| Mobil Canada | Oil and gas production | 1,636 | 1,668 | 1,690 | | -32 | -2 | -18 | -54 | -3 | -17 |
| Murphy Oil | Oil and gas production | 628 | 834 | 366 | | -206 | -25 | -17 | 262 | 72 | 20 |
| New Brunswick Power | Electricity generation | 9,700 | 8,600 | 6,300 | | 1,100 | 13 | -2 | 3,400 | 54 | |
| Newfoundland and Labrador Hydro | Electricity generation | 1,051 | 1,243 | 1,620 | | -192 | -15 | -6 | -569 | -35 | -34 |
| Newport Petroleum | Oil and gas production | 215 | 180 | 169 | 1996 | 34 | 19 | 28 | 46 | 27 | -2 |
| Nexfor ^g | Forest products | 592 | 629 | 770 | | -37 | -6 | -6 | -178 | -23 | -44 |
| Northrock Resources | Oil and gas production | 354 | 123 | 123 | 1997 | 230 | 187 | 141 | 230 | 187 | 141 |
| Northstar Energy | Oil and gas production | 984 | 1,050 | 1,026 | 1995 | -66 | -6 | -6 | -42 | -4 | 1 |
| Northwest Territories Power ^h | Electricity generation | 175 | 181 | 203 | fiscal 1990- 91 | -6 | -4 | 1 | -28 | -14 | -7 |
| NOVA Chemicals ⁱ | Chemicals | 3,827 | 3,872 | 4,290 | | -45 | -1 | -10 | -463 | -11 | |
| Nova Scotia Power | Electricity generation | 7,969 | 7,793 | 6,830 | | 176 | 2 | 0 | 1,139 | 17 | 3 |
| Numac Energy | Oil and gas production | 327 | 334 | 230 | 1996 | -7 | -2 | 0 | 98 | 42 | 16 |
| Ontario Hydro | Electricity generation | 31,031 | 22,815 | 26,000 | | 8,215 | 36 | 40 | 5,031 | 19 | 0 |
| Orenda Aerospace | Manufacturing | 8 | 9 | 8 | | -1 | -12 | -18 | 0 | -3 | -14 |
| Oxford Properties - Canterra Tower | Real estate | 19 | 20 | 25 | 1991 | -1 | -7 | -7 | -6 | -24 | -24 |
| Pacifica Papers | Forest products | 261 | 379 | 520 | | -117 | -31 | -26 | -259 | -50 | -38 |
| Paramount Resources ^b | Oil and gas production | 348 | 334 | 261 | | 14 | 4 | -13 | 87 | 33 | -16 |
| Penn West Petroleum | Oil and gas production | 645 | 608 | 576 | 1996 | 37 | 6 | 3 | 68 | 12 | -2 |
| Petro-Canada | Oil and gas production and refining | 6,931 | 7,338 | 6,909 | | -407 | -6 | -8 | 22 | 0 | -14 |
| Pine Falls Paper | Forest products | 143 | 146 | 137 | | -3 | -2 | -3 | 6 | 5 | 4 |
| Placer Dome North America | Mining and metals | 140 | 95 | 114 | | 45 | 48 | 25 | 26 | 22 | 177 |
| Poco Petroleums | Oil and gas production | 889 | 570 | 601 | 1994 | 319 | 56 | -19 | 288 | 48 | -23 |

| Company | Sector | 1998 emissions (kt CO ₂ E) | 1997 emissions (kt CO ₂ E) | | Base year if not | Change in emissions 1997-98 | | Change in emissions intensity | Change in emissions base year | emissions | Change in emissions intensity |
|---------------------------------------------------------------|-------------------------------------|---------------------------------------------|---------------------------------------------|--------|------------------------|-----------------------------------|-----|-------------------------------------|-------------------------------------|--------------|-------------------------------------|
| | | (= = 2=) | (| (| 1990 | (kt CO ₂ E) | (%) | 1997-98 (%) | -1998 (kt CO ₂ E) | -1998 (%) | base year -1998 (%) |
| Potash Corporation of Saskatchewan, Allan Division | Mining and metals | 147 | 126 | 101 | | 21 | 17 | 3 | 46 | | |
| Potash Corporation of Saskatchewan, Cory Division | Mining and metals | 201 | 187 | 118 | 1991 | 14 | 7 | -1 | 83 | | -20 |
| Potash Corporation of Saskatchewan, New Brunswick Division | Mining and metals | 130 | 132 | 96 | 1993 | -2 | | -10 | _ | | 0 |
| Potash Corporation of Saskatchewan, Patience Lake Division | Mining and metals | 93 | 102 | 113 | 1991 | -8 | | _ | | | -17 |
| Potash Corporation of Saskatchewan, Rocanville Division | Mining and metals | 223 | 211 | 168 | | 12 | 6 | -5 | 55 | 33 | -10 |
| PrimeWest Energy | Oil and gas production | 170 | 143 | 143 | 1997 | 27 | 19 | | 27 | 19 | -17 |
| Ranger Oil | Oil and gas production | 997 | 1,430 | 1,226 | 1995 | -433 | -30 | -11 | -229 | -19 | -16 |
| Regent Resources | Oil and gas production | 0 | 0 | 0 | 1996 | 0 | 20 | -4 | 0 | 18 | -57 |
| Renaissance Energy | Oil and gas production | 2,618 | 1,870 | 974 | 1993 | 748 | 40 | 9 | 1,643 | 169 | - |
| Renata Resources | Oil and gas production | 58 | 72 | 72 | 1997 | -14 | -20 | 37 | -14 | -20 | 37 |
| Repap New Brunswick ^c | Forest products | 263 | 256 | 239 | | 7 | 3 | 0 | 24 | 10 | -18 |
| Richland Petroleum | Oil and gas production | 27 | | | 1998 | | | | | | |
| Rigel Oil & Gas | Oil and gas production | 276 | | 336 | 1996 | | | | -60 | -18 | 7 |
| SaskEnergy/TransGas | Natural gas utility; pipelines | 807 | 795 | 684 | | 12 | 2 | 3 | 123 | 18 | -4 |
| SaskPower | Electricity generation | 14,707 | 14,366 | 10,585 | | 340 | 2 | -1 | 4,122 | 39 | 9 |
| Shell Canada | Oil and gas production and refining | 7,265 | 7,600 | 7,570 | | -335 | -4 | | -305 | -4 | |
| Shiningbank Energy | Oil and gas production | 36 | 36 | 36 | 1997 | 1 | 2 | -7 | 1 | 2 | -7 |
| Signalta Resources | Oil and gas production | 86 | | 68 | 1994 | | | | 18 | 27 | 15 |
| Solutia Canada [♭] | Chemicals | 9 | 11 | 17 | | -2 | -16 | | -8 | -47 | |
| Spruce Falls ^d | Forest products | 82 | 90 | 152 | | -8 | -9 | -11 | -71 | -46 | -51 |
| St. Laurent Paperboard / Cartons St- Laurent | Forest products | 501 | 493 | 554 | | 8 | 2 | -7 | -53 | -10 | -13 |
| St. Lawrence Corp. | Manufacturing | 7 | 9 | 10 | | -2 | -22 | -17 | -2 | -26 | -22 |
| Star Oil & Gas | Oil and gas production | 170 | 189 | 278 | 1991 | -19 | -10 | -23 | -108 | -39 | -22 |
| Startech | Oil and gas production | 85 | 60 | 60 | 1997 | 25 | 42 | -18 | 25 | 42 | -18 |
| Stora Enso Port Hawkesbury ^d | Forest products | 246 | | 163 | | | | | 83 | 51 | 43 |
| Suncor Energy | Oil and gas production and refining | 6,160 | 5,678 | 4,969 | | 482 | 8 | -6 | 1,191 | 24 | -23 |
| Syncrude Canada | Oil and gas production | 8,900 | 8,500 | 7,220 | | 400 | 5 | 3 | 1,680 | 23 | -9 |
| Talisman Energy | Oil and gas production | 1,146 | 910 | 775 | 1994 | 236 | 26 | 8 | 371 | 48 | 10 |

| Company | Sector | 1998 emissions (kt CO ₂ E) | | Base year emissions (kt CO ₂ E) | Base year if not 1990 | - | Change in emissions 1997-98 (%) | emissions | - | emissions | - |
|------------------------------------|--------------------------------------------------------|---------------------------------------------|--------|--------------------------------------------------|--------------------------------|------|------------------------------------------|-----------|--------|-----------|-----|
| Toronto Dominion Centre Leaseholds | Real estate | 113 | 116 | 109 | 1995 | -3 | -3 | -3 | 3 | 3 | 3 |
| TransAlta | Electricity generation | 23,359 | 24,096 | 25,827 | | -737 | -3 | -2 | -2,468 | -10 | -18 |
| TransCanada | Pipelines; electricity generation | 17,269 | 16,646 | 10,396 | | 623 | 4 | 0 | 6,873 | 66 | 1 |
| Triumph Energy | Oil and gas production | 38 | 21 | 21 | 1997 | 17 | 82 | 2 | 17 | 82 | 2 |
| Weldwood of Canada | Forest products | 370 | 349 | 427 | | 21 | 6 | 11 | -57 | -13 | -40 |
| Westaim ^c | Manufacturing; software | 4 | | | 1998 | | | | | | |
| Westcoast Energy ^j | Pipelines; natural gas utility; electricity generation | 5,218 | 5,428 | 4,141 | | -210 | -4 | -6 | 1,077 | 26 | -31 |
| Weyerhaeuser Canada ^b | Forest products | 201 | 207 | 176 | | -6 | -3 | -5 | 24 | 14 | 5 |

^a Data appear to exclude emissions associated with some purchased electricity

^b Data appear to exclude emissions associated with purchased electricity

^c It is unclear whether data include emissions associated with purchased electricity

^d Data exclude emissions associated with purchased electricity

^e Data exclude emissions associated with electricity sold to Ontario Hydro

f "1997" data are actually for JUL96-JUN97

^g It is not entirely clear whether data include emissions associated with purchased electricity

^h "1997" and "1998" data are actually for fiscal years 1997/98 and 1998/99 respectively

¹ Data exclude emissions associated with purchased electricity; for 1998 these were 798 kt CO₂E, but those for 1990 are not stated in the company's submission

¹ Data probably include emissions associated with purchased electricity but this is not stated explicitly in the company's submission