



Methane Challenge Program

Partnership and Reporting Policies

Introduction

Reporting is the primary way in which companies participate in the Methane Challenge Program. Timely, accurate reports are essential so the Program, and public, can transparently track progress towards Partners' commitments. Per General Term #5 of the Methane Challenge Partnership Agreements: *In order to maintain status as a Partner in the Methane Challenge Program, the Partner agrees to annually report specified supplemental data, per Program reporting specifications.*

This document provides practical details on Partner recognition and reporting policies for Methane Challenge Partners in both Best Management Practice (BMP) and ONE Future commitment options, based on the terms of the Partnership Agreements. This document also establishes a nomenclature and data availability policy for companies that reach their commitment achievement year and do not make additional commitments in the Program.

Finally, this document clarifies Program policies for non-reporting or non-responsive Partner companies.

Standard Partner Recognition Policy

If a company is meeting Program requirements, when does it get added to the Partner list? When does it get a Profile Page?

Once a company signs, and EPA countersigns, a Partnership Agreement, the company is immediately added to the public Methane Challenge Partner list (i.e., on the Program website and in presentations). Its commitments are added to the list of Methane Challenge commitments on the public website as well.

Once a company submits its first Program document (usually an Implementation Plan or Historical Actions Fact Sheet), EPA will create its Partner Profile Page and link to it from the Partner list. The Partner Profile Page includes the year the Partner joined and the expected date of their first report.

On all Partner Profile Pages, EPA will include the following disclaimer:

Pursuant to 5 CFR § 2635.702(c)(2), names are displayed here as the result of recognition for achievement given under an agency program of recognition for accomplishment in support of the agency's mission. Any reference to a specific company or commercial product or service by trade name, trademark, manufacturer, company, or otherwise does not constitute or imply the endorsement or recommendation of EPA.

Standard Reporting Policy

If a company is meeting Program requirements, when does it start reporting and what data does it report?

Reporting is an essential part of Methane Challenge, and company data are published on individual Partner Profile Pages; therefore, it is essential that Partners submit data to the Program each year in honor of their commitment to the Program.

A company is expected to begin reporting no later than after it has been in the Program for one full year. For example, if a Partner joins the Program mid-2020, that Partner will begin reporting in 2022. This first report will include data on activities conducted during calendar year 2021. Note that Partners can report earlier if they wish to share partial year data. In the previous example, this Partner could optionally report 2020 data covering the period it was in the Program, if it wanted to. It would report these data during the 2021 reporting season.

A Partner is expected to submit a separate reporting form for every facility in its operations, including those that are required to report to GHGRP's Subpart W and those that are not. If no commitment emission sources are present at a facility, or if sources are present but no voluntary actions were taken in a reporting year, a report should still be submitted for the facility indicating as much.

Data Resubmission Policy

If a company needs to resubmit data, how far back can it go, and will EPA publish the revised data on its website?

The Methane Challenge application in e-GGRT will support the submission of 6 years of data (i.e., the current reporting year and the five previous years). Methane Challenge will include any resubmitted data in the next annual data publication.

Making New Commitments

How can a Partner make new commitments after its current commitments end?

When a Partner's commitment ends, the company may make a new commitment. If the company chooses to make a new commitment, the information on its completed commitments will be highlighted on its Partner Profile Page and highlighted in Program materials. EPA will request the Partner sign a new Partnership Agreement to begin the new commitment(s). In making a new set of BMP commitments, while not required, the Program encourages Partners to consider adding an additional emission source and/or increasing the commitment rate (e.g., for mains replacement).

Graduated/Former Partner Policy

If a company's commitment ends and it does not make a new commitment, what happens to its data and its Profile Page? What happens if all of a Partner's commitments are no longer voluntary (e.g., are covered by federal, state, or local requirements)? What happens if a company joins the program, reports at least one year of data, but then is no longer able to participate (e.g., can no longer submit reports, or asks to leave program)?

Companies that decide not to make new commitments after their current commitments end or who have submitted at least one year of data but then can no longer participate in the Program will be considered Graduated/Former Partners. Likewise, if all of a Partner's commitments are no longer voluntary due to coverage by local, state, or federal requirements, the Partner will be considered a Graduated/Former Partner.

Graduated/Former Partners will be moved to a "Graduated/Former Partner" list to recognize their participation and achievements in the Program. Their Partner Profile Page will remain published and will be marked as that of a Graduated/Former Partner.

Inactive Partner Policy

If a company joins, but is not able to participate in the Program (i.e., does not report), the IM leaves without denoting a new contact, or the company asks to leave the Program and no longer be affiliated with it, what happens?

Companies that have signed a Partnership Agreement but are not able to participate in the Program (i.e., never report), cannot be contacted by EPA, or that choose to leave the Program and no longer be affiliated with it will be considered "inactive" Partners. EPA will remove "inactive" Partners from the Partner list and unpublish their Partner Profile Page (if the company has one). EPA will not make a formal announcement of this or publicly list inactive Partners.

If an inactive Partner wishes to become active again, it is welcome to re-join the Program by signing a new Partnership Agreement.

Inactive Partner Scenario 1: Partner is unable to submit any reports

As detailed in the standard reporting policy, annual reporting is a key aspect of Methane Challenge. If a company does not report within 1 year of its first expected reporting date, it will be considered inactive.¹ For example, a company that joins the Program in 2020 would be expected to begin reporting 2021 data during the 2022 reporting season. If this company does not report during the 2022 or 2023 reporting seasons, it will be considered inactive as of the last day of the 2023 reporting season.

Inactive Partner Scenario 2: EPA cannot contact a Partner

EPA will contact each Partner's designated Implementation Manager (IM) at least twice each year (once when the reporting season opens and once before the subsequent data publication), but usually more frequently. Thus, it is essential that Partners always maintain an active designated IM with the Program. If EPA does not receive a response from the IM during one of these outreach efforts, EPA will attempt to contact the Implementation Manager once more via email and via phone. If no response is received within 3 months of the original outreach effort, the company will be considered an inactive Partner as of the date of the original outreach effort.

Inactive Partner Scenario 3: Partner leaves the Program and no longer wishes to be affiliated with it

Per General Term #2 of the Methane Challenge Partnership Agreements, Partners can terminate a Partnership Agreement at any time. A Partner company should notify EPA of its intent to leave the Program and no longer be affiliated with it by emailing gasstar@epa.gov. The company will be considered inactive as of the date this email is sent.

¹ The Program reserves the right to consider mitigating factors.