

Pipelines and Facilities Integrity Management Program (IMP) Audit Summary

Annual Report 2025

The logo for BCOR, featuring the letters 'B', 'C', and 'R' in white with a blue and green square between the 'C' and 'R'. The background of the entire page is a photograph of a large outdoor storage yard for pipes. The pipes are stacked in long rows, with the top layer being green and the inner layers being reddish-brown. A black metal fence with a chain-link top is in the foreground, separating the viewer from the pipes. In the background, there is a dense forest of evergreen trees on a hillside under a clear blue sky.


BCOR

Role of the BC Energy Regulator

The [British Columbia Energy Regulator](#) (BCER) oversees the full life cycle of energy resource activities in B.C., from site planning to final restoration. Our role includes the regulation of natural gas, oil, hydrogen, ammonia, methanol and renewable energy sources such as geothermal, solar and wind power.

Our authority is established by way of the [Energy Resource Activities Act](#) (ERAA) and additional legislation related to heritage conservation, roads, land and water use, forestry, and other natural resources. We work to ensure industry compliance with provincial legislation to protect public safety and the environment, support reconciliation with Indigenous peoples, conserve energy resources and foster a sound economy and social well-being.

Our employees work out of seven locations to ensure our presence near energy resource activities: Fort Nelson, Fort St. John, Dawson Creek, Terrace, Prince George, Kelowna and Victoria.



We acknowledge and respect the many First Nations, each with unique cultures, languages, legal traditions and relationships to the land and water, on whose territories the BCER's work spans.

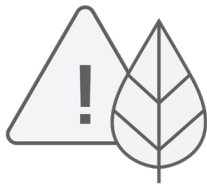
Vision, Mission and Values

Vision

A resilient energy future where B.C.'s energy resource activities are safe, environmentally leading and socially responsible.

Mission

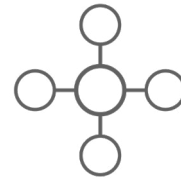
We regulate the life cycle of energy resource activities in B.C., from site planning to restoration, ensuring activities are undertaken in a manner that:



Protects public safety and the environment



Supports reconciliation with Indigenous peoples and the transition to low-carbon energy



Conserves energy resources



Fosters a sound economy and social well-being

Values

Respect is our commitment to listen, accept and value diverse perspectives.

Integrity is our commitment to the principles of fairness, trust and accountability.

Transparency is our commitment to be open and provide clear information on decisions, operations and actions.

Innovation is our commitment to learn, adapt, act and grow.

Responsiveness is our commitment to listening and timely and meaningful action.

BC Energy Regulator Office Locations Throughout B.C.



With over 25 years' dedicated service, we're committed to ensuring safe and responsible energy resource management for British Columbia.

Table of Contents

- 1 Executive Summary
- 2 Introduction
- 3 Audit Scores - Scores and Performance
 - 4 2025 Full Audit Scores
 - 5 2025 Focused Audit Scores
- 6 Audit Non-compliance Oversight and Resolution
- 7 Key Areas for Improvement
- 9 Audit Performance Trends
- 10 Safety Culture Insight
- 11 Summary

Information, assessments and discussions presented in this report are by the engineering professionals of the BCER IMP Audit Team.

Back cover photo courtesy ARC Resources



Executive Summary

In 2025, the BC Energy Regulator (BCER) completed nine pipeline and 10 facility Integrity Management Program (IMP) audits, to evaluate whether the permit holders' IMPs effectively manage the risk that may adversely affect people, property or the environment. **The average audit score for 2025 was 95 per cent for pipeline IMPs and 91 per cent for facility IMPs, reflecting the extent to which audited permit holders have effectively established and implemented IMP processes across their assets.**

Through the annual IMP audit process, the BCER reinforces its commitment to:

- protecting public safety
- preventing environmental harm
- maintaining safe operations

Oversight of permit holders' IMP regulatory obligations is strengthened through ongoing industry engagement, annual disclosure of audit results and resolution of identified issues within risk-based timeframes.



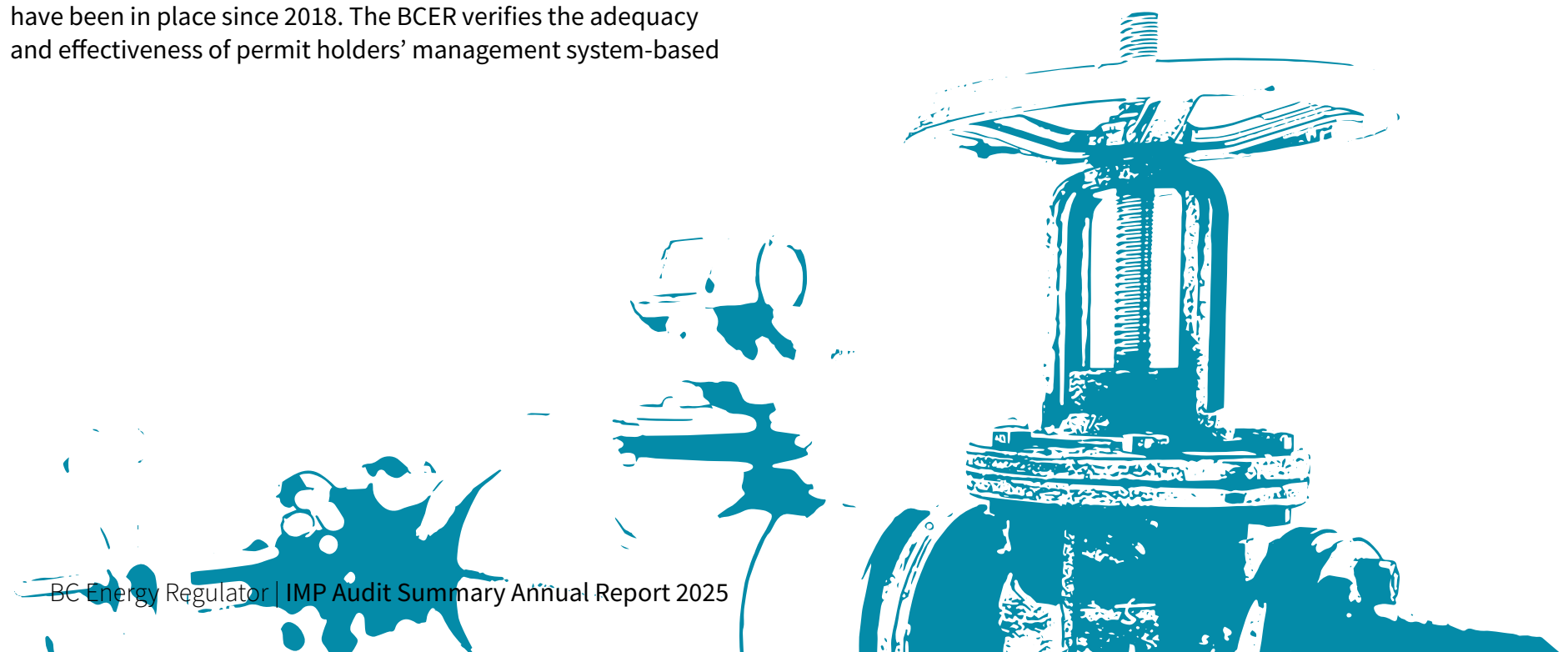
Introduction

The BCER's [Pipeline Regulation](#), [Drilling and Production Regulation](#), [Processing Facility Regulation](#) and [Liquefied Natural Gas Facility Regulation](#) require pipeline and facility permit holders to develop and implement an Integrity Management Program (IMP). These programs must anticipate hazards and analyze and manage risks to safety and the environment, across the full lifecycle of pipelines and facilities, including planning, design, procurement, construction, operation, maintenance and decommissioning.

Pipeline Integrity Management Programs have been mandated as a regulatory requirement in British Columbia since 1999 when they were included in [Canadian Standards Association \(CSA\) Z662 - Oil and Gas Pipeline Systems](#), while facility IMP requirements have been in place since 2018. The BCER verifies the adequacy and effectiveness of permit holders' management system-based

IMPs through a structured annual audit cycle. The IMP verification process - from annual permit holder selection to audit completion and subsequent follow-up on non-compliance - is detailed in the [Compliance Assurance Protocols](#).

This summary report presents an overview of the IMP audits, including their purpose, scope, methodology, results, key findings and five-year trends. Based on previous audit results, industry compliance trends and the scale of permit holder's operations, audits are designated as either full (comprehensive) or focused in scope, with full audits assessed across all 18 component requirements and focused audits assessed against a targeted subset of components.



Audit Results - Scores and Performance

In 2025, the Integrity Management Program (IMP) requirements were assessed in accordance with the Compliance Assurance Protocols, using both full and focused audits.

Through detailed evaluations of permit holders' submissions, records, documents and interview responses during the audit meetings, the audit team assessed whether the permit holders' have established and effectively implemented the required processes and procedures for both pipeline and facility IMPs. The assessment criteria included: process, scope and applicability, implementation, documentation, records and administrative controls.

Table 1. Overview of 2025 Integrity Management Program Audits

Audit Type	Number of Audits	Audit Scope	Lifecycle Phases	Average Audit Score
Pipeline IMP	9	4 Full 5 Focused	Operation, Maintenance, Decommissioning	95%
Facility IMP	10	4 Full 6 Focused	Operation, Maintenance, Decommissioning	91%



2025 Full Audit Scores

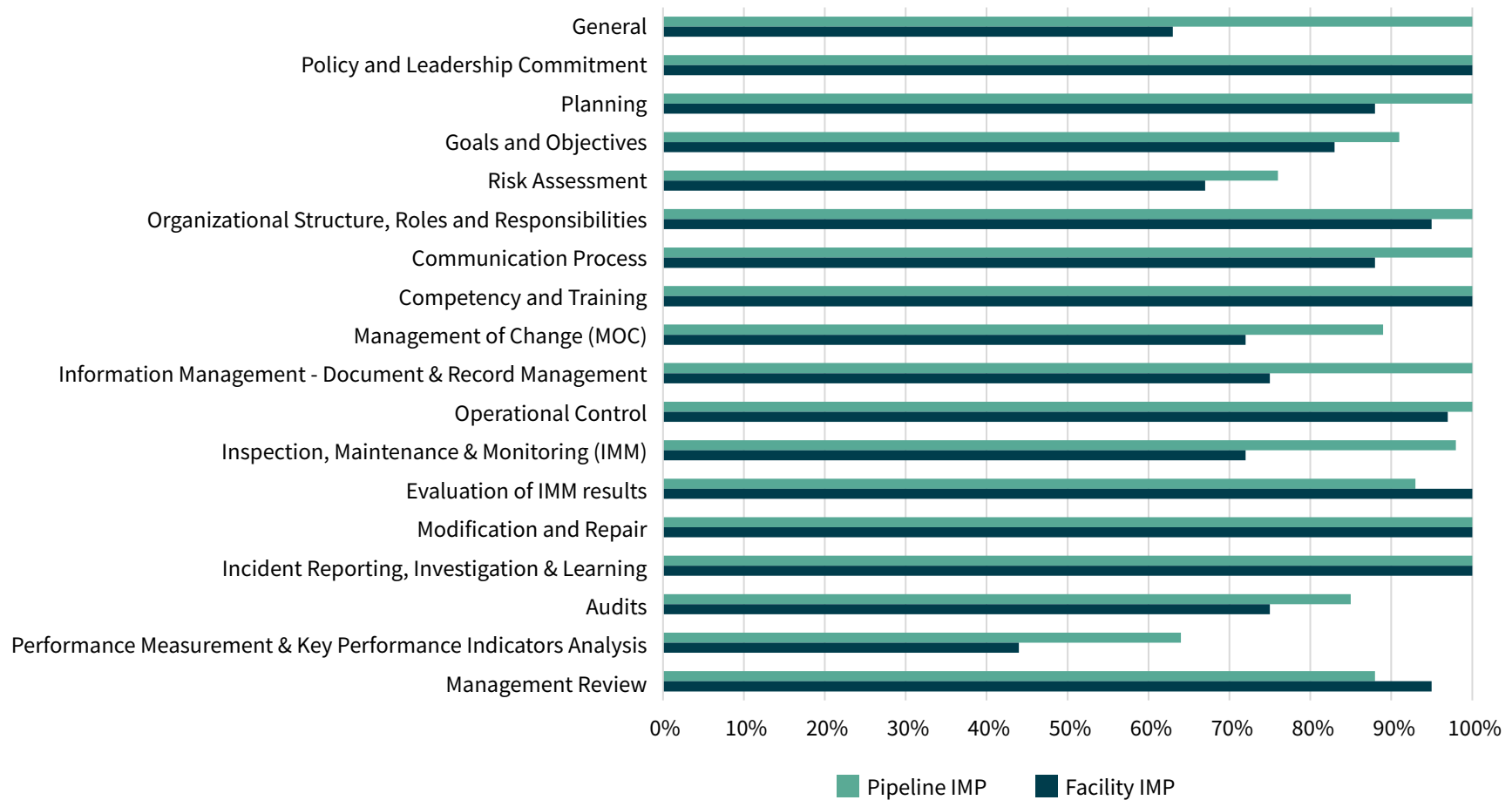


Figure 1. 2025 Full Audits - Average Component Scores

The lowest scoring components in full audits were performance measurement (KPIs), inspection maintenance and monitoring and risk assessment. These components showed gaps in process, execution, or associated records and documentation.

2025 Focused Audit Scores

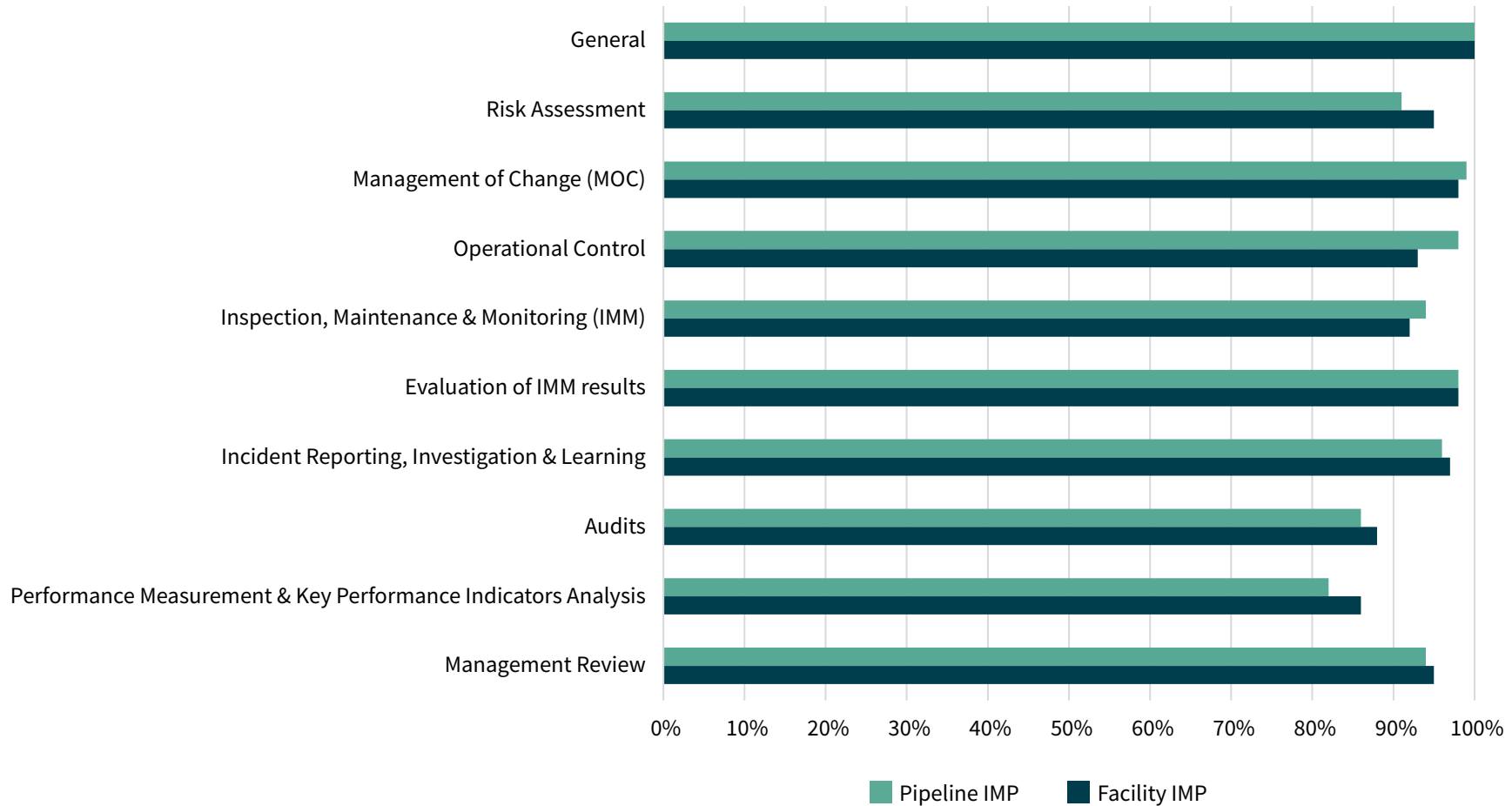


Figure 2. 2025 Focused Audits - Average Component Scores

Consistent with the full audit results, focused audits also identified gaps in performance measurement (KPIs), inspection maintenance and monitoring, and risk assessment. These areas also require strengthened processes and improved evidence of implementation.

Audit Non-compliance Oversight and Resolution

Where non-compliances are identified by the audit team, the audited permit holders are required to develop and implement corrective action plans (CAPs) to address the identified issues within a timeframe acceptable by the BCER.

To effectively manage CAP oversight, the BCER uses a structured approach for prioritizing identified non-compliances as high, medium and low. The prioritization is based on the significance, relevance and relation of the IMP components, to the overall integrity of the pipelines and facilities.

- **High priority CAPs:** Bi-monthly progress updates, completion evidence by agreed timeline.
- **Medium-priority CAPs:** Evidence of proposed action(s) completion by agreed timeline, with regular updates for longer timelines.
- **Low-priority CAPs:** Completion notification by agreed timeline.

As part of the CAP oversight management process, the BCER thoroughly reviews all CAPs, accountabilities and proposed actions. Oversight of CAPs continues until the permit holder has fully addressed all non-compliances. Failure to address the findings through the CAP oversight process can result in a variety of escalations, including compliance and enforcement actions.

Table 2. Corrective Action Plans (CAPs) snapshot - 2025

Audit Type	High	Medium	Low	Total
Pipeline IMP	9	8	6	23
Facility IMP	12	12	5	29



Corrective Action Plan (CAP) Management Process

Through the CAP management process, permit holders are required to develop and implement plans to address gaps in meeting IMP requirements.

Key Areas for Improvement

The table below summarizes the key process improvements identified from the audit team’s assessment of evidence against the Compliance Assurance Protocol requirements for pipeline and facility IMPs.

Table 3. Key Improvement Areas Across Integrity Management Programs (IMPs)

Category	Shared Themes	Pipeline-Specific	Facility-Specific
Inspection, Maintenance and Monitoring (IMM)	<ul style="list-style-type: none"> Strengthen processes for planning, scheduling, tracking and closing out of IMM activities Improve record management and accessibility Align maintenance activities with IMP requirements Implement safety critical inspections are planned and completed 	<ul style="list-style-type: none"> Deactivate or abandon inactive pipelines within regulatory timelines Address cathodic protection (CP) survey deficiencies 	<ul style="list-style-type: none"> Enhance tracking of IMM activities across all equipment types Improve oversight of safety critical inspection programs
Risk Assessment	<ul style="list-style-type: none"> Develop systematic hazard identification and risk assessment processes Assess risk at asset, equipment, facility and operational levels 	<ul style="list-style-type: none"> Implement comprehensive risk assessments for all pipeline assets 	<ul style="list-style-type: none"> Develop and maintain complete asset/equipment inventories Complete and track Hazard and Operability (HAZOP) study recommendations and revalidations
Management of Change (MOC)	-	-	<ul style="list-style-type: none"> Strengthen documentation and traceability for technical changes and develop processes for personnel related changes
General IMP Scope and Application	-	-	<ul style="list-style-type: none"> Ensure IMP scope includes all pressure and non-pressure equipment (piping, vessels, pressure safety valves (PSVs), flare systems, tanks, rotating equipment, Instrumentation and Control systems)
Key Performance Indicators (KPIs)	<ul style="list-style-type: none"> Establish a balanced set of leading and lagging KPIs (e.g., Completion of Preventive Maintenance, MOC, training, Risk assessment activities) Refine KPI targets to better support performance improvement 	-	-
Management Review	<ul style="list-style-type: none"> Formalize and document management reviews at defined intervals 	-	-
Audits	<ul style="list-style-type: none"> Establish audit programs with defined frequency, scope and processes 	-	-

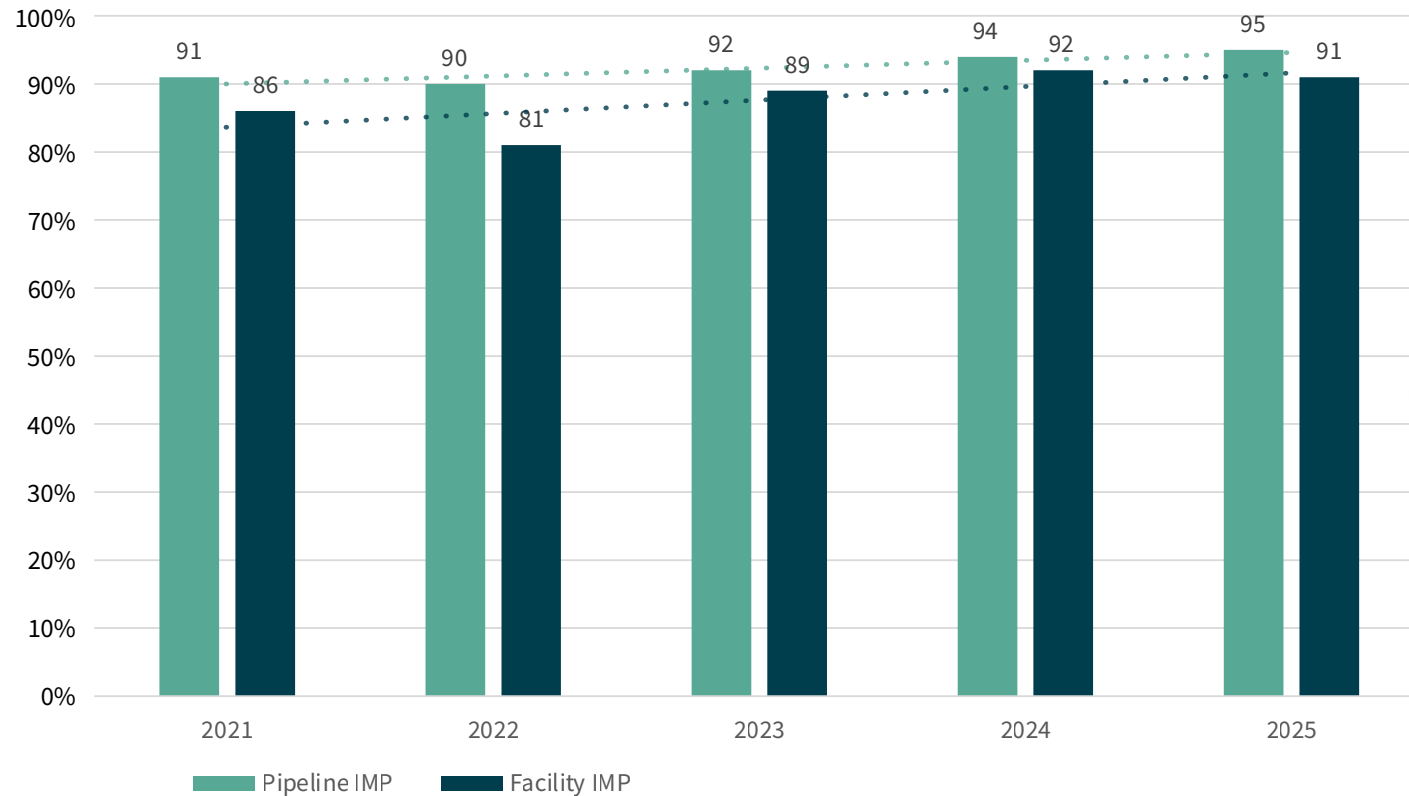
Key Improvement Areas Comparison - 2025 vs 2024

The key improvement areas identified in 2025 are largely consistent with those observed in 2024, particularly in inspection, maintenance and monitoring, risk assessment (including hazard identification) and performance measurement. However, increased gaps related to management review and audit, reflected the enhanced focus on these components during the 2025 audit cycle.



Audit Performance Trends

Variations in annual audit scores from year to year reflect the mix of permit holders selected each year (size, complexity and compliance history), audit scope (full versus focused) and maturity of individual IMP programs. The comparison of the average IMP audit scores over five years (2021-2025) indicates steady performance in pipelines and gradual improvement in facilities.



Over the past five years, average IMP audit scores indicate steady performance in pipelines and gradual improvement in facilities

Figure 3: Five-Year Comparison of Annual Average IMP Audit Scores (2021-2025)

Safety Culture Insight

The BCER uses 12 attributes to assess permit holder's safety culture during audits. In 2025, permit holders continue to demonstrate strong foundations in safety values, leadership commitment, communication, competency, learning from events and non punitive reporting.

Overall, permit holders are encouraged to reinforce leadership behaviours, refine performance metrics, strengthen risk assessment and Management of Change (MOC) processes and maintain a proactive approach to continuous improvement.

Assessed Safety Culture Attributes

1. Safety as a Core Value
2. Leadership and Management Commitment
3. Goals and KPI Measurement
4. Legal and Systems Compliance
5. Communication
6. Systematic Consideration of Risk
7. Managing Change
8. Competency and Training
9. Learning from Events
10. Non Punitive Reporting
11. Empowerment and Accountability
12. Continual Improvement



In 2025, permit holders demonstrated a proactive commitment to promoting a positive safety culture.

Summary


In 2025, the BCER completed nine pipeline IMP audits and 10 IMP facility audits as part of its ongoing oversight of permit holders' Integrity Management Programs. The average annual audit scores, with 95 per cent for pipeline IMPs and 91 per cent for facility IMPs, indicate audited permit holders have established and implemented the required IMP processes to their facility and pipeline assets.

Key non-compliances across IMPs included:

- Risk Assessment: incomplete hazard identification and outdated risk assessments.
- Inspection, Maintenance & Monitoring: gaps in scheduling, tracking and overdue activities.
- Performance Measurement: key performance indicators (KPIs) not fully aligned and relevant to IMP.
- Audit: lack of formalized audit frequencies and processes for addressing audit gaps.

The BCER requires permit holders to address all identified non-compliances through corrective action plans, with oversight maintained until all non-compliances are resolved within risk-based timeframes.

Through risk-informed oversight and industry engagement, the BCER continues to strengthen regulatory assurance and support continuous improvement in pipeline and facility integrity management.

A photograph of a worker in a white hard hat and safety glasses, wearing a dark blue jacket, working on industrial equipment. The worker is positioned on a platform with yellow and green railings. The background shows a complex industrial structure under a clear blue sky. A circular callout box is overlaid on the bottom right of the image, containing text.

The 2025 IMP audits reflected permit holders' continued commitment to safety and implementation of IMPs, while identifying opportunities to strengthen key processes across pipeline and facility programs.



BCOR

July 2026