



## Summary of Comments on the Analysis of Greenhouse Gas Emissions Associated with the Woodfibre Liquefied Natural Gas (LNG) Project

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### Introduction

The Woodfibre LNG Project (the Project) underwent a federal environmental assessment under the *Canadian Environmental Assessment Act, 2012* (CEAA 2012), substituted to British Columbia (B.C.).

As part of the Government of Canada's interim approach to environmental assessment, the Canadian Environmental Assessment Agency (the Agency) sought advice on upstream greenhouse gas emissions associated with the Project from Environment and Climate Change Canada (ECCC). ECCC prepared the *Woodfibre Liquefied Natural Gas (LNG) Project, Review of Related Upstream Greenhouse Gas (GHG) Emissions Estimates, February 1, 2016* (ECCC's analysis). The Agency held a comment period on ECCC's analysis from February 9 to March 1, 2016.

Member of Parliament for West Vancouver – Sunshine Coast – Sea to Sky Country, Pamela Goldsmith-Jones, hosted community town hall meetings on the Project during the same period. Ms. Goldsmith-Jones facilitated these meetings in the communities of Squamish (February 27, 2016), West Vancouver (February 28, 2016), and Gibsons, B.C. (February 29, 2016). Approximately 700 people attended, and 100 people spoke at the town hall meetings. Speakers were recorded on video and the video was later provided to the Agency. Each meeting was attended by an Agency staff member as a resource and to take notes and receive written comments. The notes and videos are part of the project record and the comments expressed are reflected in this summary.

### Participation in the Public Comment Period

The Agency received approximately 550 submissions by email, mail and hard copy at the town halls. Comments were received from local governments including the District of Squamish, Village of Lions Bay, Bowen Island Municipality, Whistler, and several non-governmental organizations including My Sea to Sky, Concerned Citizens Bowen, and the Sea to Sky Clean Air Society. If multiple signatures and petitions were counted individually, the total count would be 1,300 comments.

Of the commenters that identified the area of their residence, approximately 88% stated that they live in the vicinity of the Project, namely the Howe Sound (including Squamish), Sunshine Coast and Greater Vancouver regions, 10% from other parts of B.C., and 2% from outside B.C., including several comments from outside of Canada.

In addition to comments submitted to the Agency, an online petition organized by My Sea to Sky collected over 8,600 signatures by March 1, 2016 in opposition to the Project.

## Comments Regarding Greenhouse Gas Emissions and Climate Change

Of the submissions received, about 70% included remarks pertaining to greenhouse gas emissions and climate change. 49% of comments related to ECCC's analysis of upstream emissions while 43% included remarks about direct GHG emissions from the Project. More than half of the submissions expressed views about climate change and global warming, methane fugitive emissions, the GHG intensity of methane, and Canada's obligations for meeting COP21 commitments. Comments were also received regarding downstream GHG emissions and the cumulative impacts of GHG emissions.

Comments regarding ECCC's analysis, including those received from organizations such as the Pembina Institute and Canadian Centre for Policy Alternatives, were provided to ECCC for their consideration. ECCC reviewed the comments and provided an updated analysis which is posted on the Agency's Project Registry. The updated analysis did not change ECCC's estimate of GHG emissions associated with the Project.

The public comments included concerns about upstream methane fugitive emissions. On March 10, 2016 the Government of Canada announced its commitment to reduce methane emissions from the oil and gas sector by 40-45 percent below 2012 levels by 2025. The government will introduce regulations to reduce methane emissions from the oil and gas sector to address venting and fugitive emissions. Canada will publish the proposed methane regulations by early 2017, with final regulations published by the end of 2017. These regulations will apply to new and existing sources.

The Agency also considered comments regarding the direct GHG emissions from the Project. Aligned with the government's regulatory approach, the Agency proposed two conditions: one for detecting and managing fugitive methane emissions from the Project; and the other to require the use of electrically powered turbines (or similar technology that would result in equivalent or reduced greenhouse gas emissions) for the compression of natural gas.

## Comments Regarding other Environmental Effects

The comments received by the Agency included a broad range of other concerns regarding the potential environmental impacts from the Project. The issues most frequently raised were:

- effects of underwater noise and vibration from LNG carriers on marine mammals and fish;
- effects to fish and fish habitat, including herring spawn, from seawater cooling system;
- air and water pollution effects to human health;
- effects to the marine environment which is just starting to show signs of recovery from past industrial activities;
- cumulative effects from multiple industrial developments (Woodfibre LNG, Burnco Aggregate Mine, run of river hydroelectric) to Howe Sound;
- effects on marine environment from an LNG carrier accident or collision;
- potential conflicts or accidents between LNG carriers with BC Ferries or recreational boaters;
- fire and explosion risks from LNG at Woodfibre facility and LNG carriers; and
- location of LNG facility and shipping being inconsistent with industry standards articulated by the Society of International Gas Tanker and Terminal Operators (SIGTTO).

The issues listed above were considered during the substituted environmental assessment and discussed in B.C.'s Assessment Report (the Report). The Agency considered the Report and the views of Aboriginal groups, to develop the potential conditions for recommendation the Minister of Environment and Climate Change for her environmental assessment decision under CEAA 2012. Although the Agency had already considered the Report findings in developing potential conditions relevant to potential impacts of the seawater cooling system on fish and fish habitat, the Agency revisited the potential conditions as a result of additional herring spawn information provided by the public.

The observations of herring spawn made by the public were consistent with the proponent's information which indicated they were present near the project area at depths of 3 to 7 metres. As the marine water intake for the seawater cooling system is designed to be deeper than where herring spawn have been observed, and the potential conditions include the requirement to design the marine water intake to avoid or reduce the incidental capture of fish including herring, the Agency considered the mitigation measures and follow-up program to be appropriate in relation to herring spawn.

The Agency noted the public's concerns about the potential environmental effects from the proposed natural gas supply pipeline, including air emissions from the proposed compressor station. The Eagle Mountain-Woodfibre Gas Pipeline Project is not subject to a review under CEAA 2012, but is being reviewed under B.C.'s *Environmental Assessment Act*. The Agency recommends that members of the public contact the B.C. Environmental Assessment Office or visit their website: [http://a100.gov.bc.ca/appsdata/epic/html/deploy/epic\\_project\\_home\\_406.html](http://a100.gov.bc.ca/appsdata/epic/html/deploy/epic_project_home_406.html) for more information about the environmental assessment of the pipeline project.

## Other Comments

Participants expressed views on a wide range of other issues, beyond the scope of the environmental assessment of the Project. Frequently expressed concerns included hydraulic fracturing or "fracking" for the extraction of natural gas, environmental assessment processes, social license and community values, economics, and proponent distrust. Concerns with fracking in northeast B.C. related to potential earthquakes, soil and groundwater contamination, impacts to caribou, and human health effect.

Many members of the public described that the Project is not in alignment with the values of the local community, nor their vision for the future of the community and natural environment in the Howe Sound area. They advocated for socio-economic development tied to community values and their overall vision for the Howe Sound area. They expressed concern that the Project would be a setback to the local community in regards to building a sustainable, thriving local economy and healthy natural ecosystem for community members to enjoy in the immediate-to-far future. Some cited concern that the Project has the potential to adversely impact youth of the area.

Members of the public cited statements from the Prime Minister's October 2013 speech to the Calgary Petroleum Club that "Governments may be able to issue permits, but only communities can grant permission" as support for their comments in regards to the lack of social license for the Project.

Public comments with regards to community values also linked the health of the natural environment to the success of the tourism and film industries and other socio-economic considerations. The public stated support for exploring economic development alternatives to LNG in the area. They encouraged the development of renewable energy and related technologies rather than fracking and development

of the LNG sector. They expressed a desire to protect the natural environment of Howe Sound for present and future enjoyment, and to focus development on renewable energy sources and a locally-driven, carbon free economy.

Some comments from the public expressed concern with the ethics and human rights record of the proponent. Some also expressed discomfort with actions being taken by foreign companies that would have the potential to directly and adversely impact their local environment. They expressed concern that Canada and the local community would have to deal with a range of potential adverse impacts should markets decline and the proponent abandon the Project. There was a view that the local community would see little benefit in relation to overall perceived risk, including from a taxation perspective. In contrast, comments received in support of the project presented a positive perspective on jobs and economic benefits from the Project.

Some comments regarding the environmental assessment process were critical of the substituted review carried out by B.C., stating that public consultation was inadequate, the review process was hurried, and the substituted environmental assessment was biased considering B.C.'s strong interest in development of the LNG sector. Some comments indicated that the information provided by the proponent was incomplete, poor quality and biased.

Some people said the Agency's comment period was too short and should have been extended. They also noted that federal expertise and presence should have been stronger in the review given the number of issues within federal jurisdiction. Some stated the environmental assessment process in general needs to be fixed.

Regarding concerns about the environmental assessment process in general, the Agency notes that the Government of Canada's interim approach to environmental assessment is the first part of a broader strategy to review and restore confidence in Canada's environmental assessment processes. As stated in the December 2015 Speech from the Throne, federal environmental assessment processes will be informed by scientific evidence. Public input will be sought and considered and Indigenous peoples will be more fully engaged in reviewing and monitoring major resource development projects. The processes will have greater transparency. Indigenous people and the public will be invited to participate in the review of environmental assessment processes to ensure their important contributions and perspectives may be taken into account.

## Agency Views

The Agency thanks the individuals and organizations that participated in the comment period and submitted their thoughtful and comprehensive comments.

Overall, the Agency is satisfied that the issues raised in the comments were adequately considered during the environmental assessment process and/or do not alter the conclusions of the Report prepared by B.C. or ECCC's analysis, for the purposes of the Minister of Environment and Climate Change's environmental assessment decision under CEAA 2012.