

Wilderness Committee submission on Cedar LNG project

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I'm writing on behalf of the Wilderness Committee's 60,000 supporters across Canada with regards to the Impact Assessment for Cedar LNG in Kitimat, B.C. Wilderness Committee has significant concerns with this project, in particular its related carbon emissions, cumulative impacts from fracking operations in the northeastern part of the province and its impacts on the endangered marbled murrelet.

Cedar LNG is one of several proposed liquefied natural gas facilities in the province that make it significantly more difficult for the province to meet its targets for reducing greenhouse gas emissions. Under CleanBC, the government committed to a 40 per cent reduction below 2007 levels of carbon dioxide equivalent by 2030. Current climate initiatives only amount to 75 per cent of this goal, without even factoring in a planned expansion of the LNG Canada project.¹ This shortcoming illustrates how difficult it is for governments to achieve emissions reductions, and should give the Impact Assessment Agency (IAA) cause for extreme caution when evaluating any proposed increase in carbon emissions. Based on the provincial government's track record of consistently failing to meet its climate targets, the regulator cannot assume the additional greenhouse gas produced by Cedar LNG will be accounted for elsewhere.

The proponent forecasts the facility will produce 168,000 tonnes of carbon dioxide annually if its liquefaction processes can be powered from the BC Hydro grid and 840,000 tonnes if it relies on its own gas for power. Neither of these increases are compatible with federal and provincial government priorities to reduce greenhouse gas emissions, but obviously the latter total would be an exponentially larger setback for these goals. Wilderness Committee also questions the methodology of the proponent in detailing only the greenhouse gas emissions generated at the Cedar LNG facility while ignoring the significant methane emissions of increased fracking activity required to supply the project. Using the Pembina Institute's 2015 Shale Scenario Tool, we forecast the project would require 5,276 new wells in northeastern B.C. over the next 30 years.² According to research from the David Suzuki Foundation, 85 per cent of active wells leak methane into the atmosphere at an average rate of 27.1 cubic metres per day. This staggering figure means new wells associated with Cedar LNG would be responsible for an annual 39,882 tonnes of methane emissions per year. Using a conservative 100-year timescale, the global warming potential of methane is considered 25 times greater than carbon dioxide. Therefore we estimate the upstream emissions associated with the Cedar LNG project to be 997,050 tonnes of CO₂e or close to six times the projected emissions of a grid-powered facility. We urge the IAA to consider the full climate impacts of the project and weigh it against the targets set by provincial and federal governments. Wilderness Committee believes the significant adverse climate impacts of Cedar LNG alone should disqualify the project from approval.

¹ <https://news.gov.bc.ca/releases/2018PREM0088-002338>

² <https://www.pembina.org/pub/BCShaleTool>

Cumulative impacts of the upstream fracking activity associated with the projects also deserve careful examination by the IAA. In northeastern BC, caribou habitat has been decimated³, groundwater has been depleted⁴ and community health has been put at risk⁵ because of existing gas development. Thousands of new additional wells in the region will only exacerbate the significant adverse impacts on its ecosystems and communities. Wilderness Committee would stress the need for the IAA and the proponent to assess the cumulative impacts of gas development associated with Cedar LNG and consult with affected Indigenous communities in the province's northeast. If the agency were to limit the scope of the review to the facility itself it would risk damaging the credibility of the new Impact Assessment process in one of its first applications.

Finally, Wilderness Committee is concerned about the site footprint's overlap with critical habitat for the endangered marbled murrelet. Under the Species At Risk Act, any federally-reviewed project that would adversely impact critical habitat requires further environmental review to determine if these impacts are significant. Removal of nesting habitat and the creation of a "hard edge" in the construction of the project are listed as activities likely to result in the destruction of critical habitat under the latest recovery strategy.⁶

Because of the significant adverse impacts of the project and its associated upstream gas development, Wilderness Committee would ask the IAA to reject Cedar LNG's application.

³ <https://www.elgaronline.com/view/edcoll/9781784712297/9781784712297.00009.xml>

⁴ <https://www.pembina.org/reports/unconventional-natural-gas-water-risks-2018.pdf>

⁵ <https://www.ncbi.nlm.nih.gov/pubmed/29122312>

⁶ https://sararegistry.gc.ca/virtual_sara/files/plans/rs_guillemot_marbre_marbled_murrelet_0614_e.pdf