COMMENTS ON THE TAILORED ENVIRONMENTAL IMPACT STATEMENT GUIDELINES FOR THE GAZODUQ PROJECT

Équiterre Submission to the Impact Assessment Agency of Canada
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I. Introduction

The present comments are presented to the Impact Assessment Agency of Canada ("IAAC" or "Agency") in response to IAAC's January 30, 2020 invitation for public comment on two IAAC documents concerning the Gazoduq Project (a project proposed by Gazoduq Inc., the "Proponent"): the "Draft Public Participation Plan for the Impact Assessment of the Gazoduq Project" ("Draft Public Participation Plan") and the "Tailored Environmental Impact Statement Guidelines Pursuant to the *Impact Assessment Act* and the *Canadian Energy Regulator Act*" ("Tailored EIS Guidelines" or "Guidelines"). Équiterre thanks the Agency for this opportunity to provide comments as part of the Planning Phase in the new IAAC Integrated Assessment process. Please note that our comments on the Draft Public Participation Plan were previously submitted in a separate document.

Équiterre is the largest environmental organization in Québec, with offices in Montréal, Quebec City and Ottawa. As a non-profit, charitable organization, Équiterre has worked for over 25 years to raise awareness and advocate for sound environmental and energy policies in Quebec, Canada and on the international scene as well. Since its creation in 1993, Équiterre's primary mission has been to help build a social movement by encouraging individuals, organizations and governments to make ecological and equitable choices, in a spirit of solidarity. Our organization includes 27,000 members and more than 120,000 supporters located largely in Eastern Canada, and manages the world's largest community-supported agriculture program, with over 120 organic farms in Quebec.

Équiterre is concerned with the impact assessment of the Gazoduq Project out of its concern with the potential risks to the environment and to Québec communities posed by the construction and operation of this natural gas pipeline across the province. More specifically, Équiterre is concerned by issues

including but not limited to the climate change implications of adding natural gas infrastructure that can lead to increased hydrocarbon production, methane emissions (through fugitive emissions or planned releases), disturbances of water bodies, forests and other natural resources in Québec and potential safety hazards to communities.

Équiterre has a long and solid track-record in analyzing risks of pipelines and other hydrocarbon infrastructure projects. For many years and in a variety of contexts, we have participated in public hearings and other engagement activities at both federal and provincial levels to raise important issues about the impacts on the environment and on local communities of large-scale energy infrastructure projects. In recent years, Équiterre has participated in reviews of a proposed new marine terminal on the Saint-Laurent River at Beauport, the Energy East crude oil pipeline project and the reversal of the Enbridge Line 9 pipeline. Équiterre has also studied environmental and safety issues on the Portland-Montreal crude oil pipeline and the Trans-Nord refined petroleum products pipeline. Équiterre has also produced reports related to pipeline safety and drinking water issues.

In 2019, Équiterre provided comments to CEAA on the Environmental Impact Assessment for the Énergie Saguenay Project, prepared by GNLQ, and to IAAC on the Gazoduq Project Initial Project Description Documents (comments submitted jointly with the David Suzuki Foundation).

II. Important new context for impact assessment of oil and gas industry projects

Équiterre underscores the need for heightened scrutiny of fossil fuel projects now more than ever, due to the worsening climate crisis. We are currently living in the uncharted territory of a climate crisis that has been hastened by a lack of attention to decades of warnings from the scientific community coupled with weak or absent action from all levels of domestic government as well internationally.

New research showing that the oil and gas industry is more responsible for GHG emissions than previously thought means that assessment processes must be comprehensive, careful, and respectful of the precautionary principle. Recently, both the New York Times[1] and The Guardian[2] published major stories on new research findings published in the journal *Nature*[3] showing that oil and gas production is a far bigger threat to the climate crisis than previously thought. (To be clear, the research was not concerned solely with production, but rather with fossil fuel emissions in general).

The New York Times reported that the findings "add urgency to efforts to rein in methane emissions from the fossil fuel industry, which routinely leaks or intentionally releases the gas into air."[4] Researchers have been trying to understand why atmospheric concentrations of methane have more than doubled since the preindustrial era, and the answer is becoming clear: "human emissions of fossil methane have been underestimated by up to 40%".[5] It was further reported that the researchers believe its findings will pressure the oil and gas industry to take action like preventing leaks, reducing flaring and

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[1] Hiroko Tabuchi, "Oil and Gas May Be a Far Bigger Climate Threat Than We Knew". New York Times, February 19, 2020, https://www.nytimes.com/2020/02/19/climate/methane-flaring-oil-emissions.html.

[2] Jonathan Watts, "Oil and gas firms 'have had far worse climate impact than thought'. The Guardian, February 19, 2020, https://www.theguardian.com/environment/2020/feb/19/oil-gas-industry-far-worse-climate-impact-than-thought-fossil-fuels-methane.

[3] Hmiel, B., Petrenko, V.V., Dyonisius, M.N. *et al.* Preindustrial CH_4 indicates greater anthropogenic fossil CH_4 emissions. *Nature* **578,** 409–412 (2020). https://doi.org/10.1038/s41586-020-1991-8.

[4] *Supra* note 1.

[5] *Supra* note 2.

switching to renewables where possible.[6] Studies such as these underscore what we already know to be the case: governments must do all they can to encourage a transition away from fossil fuels and, in the meantime, take action to hold oil and gas companies to account for their greenhouse gas emissions.

The time for closer scrutiny of gas and oil products, whether production- or transport-related, is now. As Dr. Fatih Birol, Executive Director, International Energy Agency, said recently: "The world urgently needs to put a laser-like focus on bringing down global emissions. This calls for a grand coalition encompassing governments, investors, companies and everyone else who is committed to tackling climate change."[7]

III. Tailored Environmental Impact Statement Guidelines

Équiterre wishes to note that, in general, the Guidelines are thorough and thoughtful, and many of our comments concern details aimed at improving upon what is already in the Guidelines. That said, there are two topics that we believe are not sufficiently covered in the Guidelines in an explicit way and we wish to highlight these at the outset.

The first issue concerns methane emissions. As explained in section II, above, methane has truly come to the forefront of issues that need urgent attention in the battle to fight climate change, and the oil and gas industry has been identified as playing a larger role in methane emissions than previously thought. In light of this, Équiterre strongly recommends that IAAC revisit these Guidelines with an eye to ensuring that they specifically require the proponent to measure, monitor, control and mitigate all sources of methane associated with the Gazoduq Project. The problems with methane are serious enough that it is not sufficient to presume that all necessary steps will be taken on methane emissions under the rubric of GHG emissions more generally. Not to overstate the point, but the fact that neither the Project Description for Gazoduq nor the Guidelines mention the word methane is unfortunate and we hope that the Guidelines will be revised accordingly. Specific suggestions on the subsections in need of attention on the topic of methane are provided below, among the comments on Part 2 of the Guidelines.

The second serious issue that Équiterre wishes to highlight in the Guidelines concerns explosions. While infrequent, gas pipeline explosions continue to happen in Canada and around the world and they obviously have serious health, safety and environmental impacts. While IAAC may well view explosions as events that fall within the category of "accidents" or "incidents", we believe that they deserve special attention by both IAAC and the proponent in relation to the impact assessment of the Gazoduq Project. As such, we recommend that IAAC revisit the Guidelines to ensure that text reflects specific mention of explosions in the pertinent parts of the Guidelines.

<u>Please note that the comments below are presented according to the subheadings utilized in Parts 1 and 2 of the Guidelines</u>. Only those subsections upon which Équiterre is commenting are represented below.

Part 1

1. Introduction[8]

In this subsection reference is made to "the proposed designated project's contribution to sustainability".

[6] Ibid.
[7] IEA (2019), "World Energy Outlook 2019", IEA, Paris https://www.iea.org/reports/world-energy-outlook-2019.
[8] Guidelines, Part 1, p. 1.

Équiterre finds this phrasing unfortunate, even acknowledging that it flows from the wording in ss.22(1)(h) of the *Impact Assessment Act* (IAA) concerning how a project "contributes to sustainability". To talk about a fossil fuel project's "contribution to sustainability" is too misunderstand or misapply the concept of sustainability, which is of course anchored in the notion of using resources in a way that helps protect rather than cause risks to the environment. Consequently, we recommend that the phrase "the project's impact" on sustainability or "the project's effect" on sustainability be used in place of the phrase "the project's contribution to sustainability".

Part 2

1.2. Project overview[9]

Équiterre is pleased to see that the Guidelines stipulate that, "If the project is part of a larger sequence of projects, the Impact Statement must outline the larger context." Since the Gazoduq Project is clearly, directly and closely connected to the Énergie Saguenay LNG liquefaction and export terminal project, we expect that in its Impact Statement, Gazoduq Inc. will provide an overview of the relationship between these two projects, in order to fulfill this requirement in the Guidelines. This expectation seems particularly reasonable in light of the following statement, which Équiterre finds encouraging in that it represents a step forward in the proper evaluation of closely connected projects:

> "The direct and incidental effects of all physical activities of the projects of GNL Québec Inc., including marine shipping, and Gazoduq Inc. will be assessed as part of the separate federal assessment process. The cumulative effects of both projects, combined with those of other physical activities, past or future, will be assessed as part of the assessments of each project."[10]

1.4. Regulatory framework and the role of government[11]

In light of the importance of the methane issue highlighted in section II above, and in light of this subsection's requirement that the proponent refer to all potentially applicable regulations in its Impact Statement, Équiterre strongly recommends that IAAC revise this section in order to draw the proponent's attention to the new federal methane regulations that came into force on January 1, 2020, the *Regulations Respecting Reduction in the Release of Methane and Certain Volatile Organic Compounds (Upstream Oil and Gas Sector*).[12] These new methane regulations appear to apply to federally regulated pipelines.

2.3. Project activities[13]

Équiterre suggests that, in addition to the information already required, the proponent should provide specific date ranges estimated for project milestones

[9] Guidelines, Part 2, p. 1
[10] Guidelines, Part 2, p. 2.
[11] Guidelines, Part 2, p. 3.
[12] Government of Canada, SOR/2018-66, https://laws-lois.justice.gc.ca/PDF/SOR-2018-66.pdf.
[13] Guidelines, Part 2, p. 5.

2.3.2. Operation[14]

Out of concern over the methane emissions problem in the oil and gas industry highlighted in section II, above, Équiterre recommends that this subsection be revised to specifically require the proponent to include in its description of elements of its project activities all details relating to the measurement, monitoring, control and mitigation of methane. Such details should cover planned and accidental releases, fugitive emissions and explosions during the operational phase. Équiterre notes that this subsection does mention the detection of possible leaks, but that the substance is not specified, nor are the methods of detection mentioned and all such details should be included in this section.

3.1. Purpose of the project[15]

Équiterre agrees with the requirement in the Guidelines stipulating that the proponent indicate whether or not the project is a pipeline intended to serve export markets and should also identify the intended target markets, be they international, domestic local, etc. For reasons explained in the next subsection, below, Équiterre believes that the proponent should include export markets in its analysis – for both the purpose and need discussions.

Équiterre also favours IAAC's approach encouraging the proponent to consider the perspectives of the public, Indigenous peoples, and governments as it establishes its objectives relating to the intended effect of the project on society. This, in fact, is a key reason why there must be full transparency in the Impact Statement about the ultimate demand to be served by this project – namely to supply the "raw materials" for a fully export-oriented business: the liquefaction and export project Énergie Saguenay. The public and all those affected need to be able to weigh in on the desirability of facilitating this export project go forward in light of other concerns such as climate change, impacts of shipping on the Saguenay River, etc.

3.2. Need for the project[16]

The Guidelines note that "in many cases, the need for the project can be described in terms of the demand for a resource" and that the proponent "should provide supporting information that demonstrates the need for a project." With this in mind, Équiterre strongly recommends that such information include *up-to-date* information on projected gas demand in target markets under *several different scenarios*, including global scenarios requiring countries to reduce GHG emissions further than currently planned in order to take needed and urgent action on the climate crisis. As is well-known and has been underscored by recent events in global oil and gas markets, the demand issue is no longer amenable to reliable projections or reasonably stable, long-term predictions. As such, multiple scenarios must be provided by the proponent in relation to expected demand for its product at its terminus and also in relation to expected demand for liquid natural gas (LNG), given that Gazoduq Inc.'s primary and possibly sole customer would be its closely related partner, GNL Québec who plans to export LNG produced from the gas supplied by Gazoduq Inc.

Furthermore, and in light of the need for the proponent to account for the demand for its product vis-à-vis the demand for LNG, Équiterre strongly recommends that the Guidelines require the proponent to identify the LNG projects in Québec, in Eastern Canada, and on the East Coast of the U.S. that may serve the same

[14] Guidelines, Part 2, p. 7.
[15] Guidelines, Part 2, p. 9.
[16] Guidelines, Part 2, p. 10.

export markets referred to in the Guidelines under subsection 3.1. The proponent should, in our opinion, provide the current status of each of these LNG projects in terms of approvals, Final Investment Decisions (FID) etc., in order to provide IAAC, CER and the public with a full and accurate picture of the context for the anticipated demand that is believed by the proponent to underlie the need for the project. A market analysis of demand that omits reasonably likely competitors for the same target markets would be, in our view, a flawed analysis and one upon which project decisions and approvals should not be made.

4. Description of public participation and views[17]

Équiterre strongly recommends that IAAC require the proponent to gather the views and concerns of any member of the public who may be affected by pipeline crossings or other impacts on public watercourses expected from the Gazoduq Project. Public waterways are, due to their public nature, often used by people who are not necessarily landowners and who may not even reside in nearby communities. This is the case for those who engage in recreational fishing, canoeing, and similar pursuits. As such, members of the public such as these may be affected by pipeline construction activities and routes, and their views and concerns should be gathered by the proponent and described in the Impact Statement along with concerns and views of landowners, municipalities, etc.

6.6. Description of mitigation measure[18]

This subsection should specifically include mitigation of methane. Équiterre is concerned about methane emissions with the Gazoduq Project, whether through planned releases, accidents or fugitive emissions, particularly in light of the fact that the company's Project Description makes no mention of methane whatsoever. (Please also note that the word "measure" in the subtitle should be corrected to "measures").

6.8. Cumulative effects assessment[19]

As discussed below, under subsection 20, Équiterre is pleased that the Guidelines require that the proponent, when analyzing cumulative effects of the Gazoduq Project, include consideration of GNL Québec's Énergie Saguenay project. While the final sentence of subsection 6.8 refers the reader to subsection 20 for additional details on cumulative effects assessment,[20] Équiterre believes that it would be helpful to also mention the consideration of impacts of the Énergie Saguenay project in relation to the proponent's treatment of cumulative effects in this earlier subsection (ss. 6.8) as well.

7.3. Geology, geochemistry and geological hazards[21]

Équiterre simply recommends here that the proponent be required to include maps of all geological hazards showing historic location and scope of events such as landslides, earthquakes, etc.

[17] Guidelines, Part 2, p. 13.
[18] Guidelines, Part 2, p. 26.
[19] Guidelines, Part 2, pp. 27 – 28.
[20] Please note, there is a typo in that sentence referring the reader to subsection 20.
[21] Guidelines, Part 2, p. 30.

12.1. Changes to the atmospheric, acoustic and visual environment[22]

Équiterre simply wishes here to point out that in other contexts, such as the current Regional Assessment of Offshore Exploration Drilling, IAAC includes GHGs in its discussion of "atmospheric effects", however in the Guidelines for Gazoduq, all references to GHGs are discussed separately. Our concern is that the many helpful requirements IAAC is placing upon proponents relating to atmospheric emissions in this subsection (e.g., proponent to provide detailed descriptions of all emissions sources, including fugitive emissions) should apply equally to GHG emissions, if they do not already. If it is IAAC's intention that GHG emissions be covered also within this subsection, we recommend that this be stated explicitly.

13.5. Climate Change[23]

Équiterre observes that the government of Canada's current methods of estimating GHGs from large projects are insufficient and thus IAAC should require the proponent to go beyond them in its approach to estimating GHGs. For example, fugitive emissions are largely not covered under Canada's approach,[24] which relies largely on the use of emissions factors. The emissions factors approach to estimating GHGs suffers from a number of problems, well summarized in a new Brown University research study highlighting the insufficiency of the "emissions factors" approach used by Canada and other countries.[25]

Also, Équiterre notes that in this section, the proponent is asked to "describe how the project can contribute to Canada's efforts to reduce GHG emissions…". We feel that this way of framing the request is not desirable in that it gives the appearance of presuming that the project may be able to help reduce Canada's GHG emissions when – as a fossil fuel project – this view is not credible. We prefer to see the language changed to require the proponent to discuss how the project may impact Canada's efforts to reduce GHG emissions, rather than "contribute to Canada's efforts…".

16. Effects on Valued Components – Economic Conditions[26]

First, Équiterre applauds the fact that upstream impacts are to be covered by the proponent in relation to the effects on valued components. However, in light of the fact that, as discussed directly below, jobs and economic info seem to include projected downstream effects, Équiterre recommends that downstream impacts on all valued components be included as well. It seems unfair for the proponent to be able to discuss the benefits of jobs etc., anticipated from production activities downstream of the project without also accounting for the environmental costs associated with downstream production activities, particularly in relation to the Énergie Saguenay liquefaction and export terminal project.

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[22] Guidelines, Part 2, pp. 60 – 61.
[23] Guidelines, Part 2, pp. 72 – 73.
[24] Government of Canada, National Inventory Report 1990-2017: Greenhouse Gas Sources and Sinks in Canada, Annex 6 "Emission Factors", http://publications.gc.ca/collections/collection_2019/eccc/En81-4-2017-2-eng.pdf.
[25] Deborah Gordon and Frances Reuland, "Mapping, Measuring, and Managing Methane: The Critical Role of a Potent Climate Pollutant." Watson Institute for International and Public Affairs, Brown University, November 2019, https://watson.brown.edu/files/watson/imce/news/ResearchMatters/2019/Methane%20Report-6%20November%202019.pdf.
[26] Guidelines, Part 2, pp. 81 – 82.

16.2. Employment[27]

Équiterre observes that this section states that the proponent's impact statement must: "provide a description of the effects associated with upstream extraction and downstream production". (our emphasis). We wish to point out that if downstream effects are discussed for employment, then this opens the door to discussion of downstream effects for the other side of the ledger – namely, adverse environmental impacts associated with production.

16.4. Economy[28]

Équiterre recommends that the proponent's description of the potential effects of the changes in the economic conditions of the communities concerned include some factor to represent the impact of changes due to climate change. Fossil fuel projects must be considered as contributing to the effects of climate change on communities, and consequently, the effects of the Gazoduq Project must be reflected in a way that does not amount to a zero effect on the economic conditions of communities.

18. Mitigation and Improvement Measures

18.1. General[29]

Équiterre recommends that the proponent be required to provide specific references where it discusses its plans to use the best available technology and best environmental practices with respect to mitigation. In light of the information mentioned in the "Context" section of these comments, we remain highly concerned with the proper measurement, monitoring and mitigation of all methane releases, leaks and fugitive emissions. Équiterre would be pleased to provide, upon request, a list of resources on this topic.

18.2. Atmospheric, Acoustic and Visual Environment[30]

Équiterre recommends that this section include requirements pertaining to methods and practices to be deployed to reduce and control all atmospheric emissions, not those limited to contaminants (e.g., VOCs). Furthermore, if the CCME's National Emission Guidelines for Stationary Combustion Turbines do not cover methane emissions from gas-powered turbines, IAAC should add a specific requirement to that effect for this subsection.

18.10 Climate change and GHG emissions[31]

With respect to the requirement that the proponent describe measures and practices to minimize the project's GHG emissions, Équiterre recommends that IAAC ask the proponent to specify the type of procedures, methods and, if possible, technologies to be used in its approach to leak detection. Équiterre's previous research on pipeline safety[32] indicates that there seems to be a great deal of variation in the effectiveness of certain types of leak detection practices.

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[27] Guidelines, Part 2, p. 83.
[28] Guidelines, Part 2, pp. 84 –85.
[29] Guidelines, Part 2, pp. 90 –91.
[30] Guidelines, Part 2, pp. 92 –94.
[31] Guidelines, Part 2, pp. 104 –105.
[32] Équiterre, *Oil pipeline incidents, accidents and spills and the ongoing failure to protect the public*, June 2018, https://equiterre.org/sites/fichiers/divers/pipeline-en_final_new_graph_v2.pdf.

20. Cumulative Effects Assessment[33]

Équiterre is pleased to see that, in this subsection, the proponent will be required *inter alia* to:

> "…specify whether other projects or activities that have been or will be carried out, including the project that involves the construction and operation of a natural gas liquefaction facility and export terminal in Saguenay, Quebec, proposed by GNL Quebec Inc., could result in effects on the selected VCs within the defined boundaries and whether those effects could interact with the residual effects of the project."

We strongly recommend, however, that the Énergie Saguenay project also be mentioned earlier in this subsection, where "future projects or activities" are mentioned, and in relation to the spatial and temporal boundaries and the fact that, as the Guidelines state, such boundaries "...will generally be larger than boundaries for the effects of the project alone, and may extend beyond the jurisdictional boundaries of Canada."

21. Other effects to consider
21.1 Effects of potential accidents or malfunctions[34]

Équiterre recommends two improvements in this sub-section.

First, we suggest that when the proponent identifies hazards and conducts "an analysis of the risk of each accident or malfunction during each project phase", that IAAC require the proponent to ensure that its analysis includes reference to incident data on gas pipelines available from the Canadian Energy Regulator and the Transportation Safety Board of Canada. Both agencies provide datasets with fine levels of information on the various types of accidents and incidents that have occurred on Canadian gas pipelines over the years, and usually includes information on details such as volumes of gas leaked, the components involved, etc.

Second, we strongly recommend that IAAC require proponents to describe specifically all procedures, equipment and resources to be deployed in gas of explosion. While we recognize that explosions fall within the category of "accidents" or "incidents", explosions can have such grave consequences for communities and the environment that we believe special attention is warranted in the Guidelines and the proponent's Impact Statement.

21.2 Effects of the environment on the project[35]

Équiterre applauds the IAAC's acknowledgement that climate change may could cause effects on the project and the inclusion of specific requirements for the proponent to describe the "trends in meteorological events, weather patterns or physical changes in the environment that are expected to result from climate change" and how this information has been incorporated into risk assessment and mitigation plans. In describing such trends, we underscore that a range of predictions will be necessary for

[33] Guidelines, Part 2, pp. 109 –111.
[34] Guidelines, Part 2, pp. 111 –113.
[35] Guidelines, Part 2, pp. 113 –114.

proponents to consider, since the very nature of climate change is toward greater rather than less certainty with respect to things like extreme weather events, flooding, etc. As we have seen in recent years in Québec, flooding events that in the past may have been considered something akin to "100-year floods" are now happening with greater frequency (as in 2017 and 2019 in the areas west of Montréal).

22. Canada's ability to meet its environmental obligations[36]

In the context of the increasingly urgent nature of the climate crisis, it is of utmost importance that the proponent also provide detailed analysis on how Canada can meet its reduction targets and goals if both Gazoduq's pipeline project and Énergie Saguenay's liquefaction and export terminal project go forward. As Équiterre has stated previously elsewhere, it is meaningless to look only at the pipeline project's impact on Canada's ability to meet its obligations. We believe that including the Énergie Saguenay project in this aspect of the analysis is consistent with the Agency's intentions as presented in other areas of these Guidelines.[37]

Furthermore, Équiterre wishes to underscore the need for the proponent to include the upstream emissions analysis referred to in the Part 2 Annex in its discussion of the relationship between the project and Canada's ability to meet its environmental obligations.

23. Description of the project's contribution to sustainability[38]

As mentioned previously in these comments, Équiterre finds the use of the phrase "the project's contribution to sustainability" unfortunate, despite the fact that it is no doubt intended to reflect the language in the IAA, in ss.22(1)(h) concerning how a project "contributes to sustainability". Consequently, we recommend that the phrase "the project's impact or effect on sustainability" be used instead of "the project's contribution to sustainability". This modification is important in order to avoid the appearance of value judgments about the effect of the project on sustainability, particularly in light of the fact that protection of the environment lies at the heart of the notion of sustainability.

24.3 Inspection, monitoring and follow-up[39]

Équiterre recommends including a specific requirement that the proponent describe its plans to comply with the new federal methane regulations.[40]

PART 2 – REFERENCE DOCUMENTS[41]

Équiterre observes that the list of reference documents does not include a section on applicable laws and regulations, and consequently recommends including such a section.

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[36] Guidelines, Part 2, pp. 114 –115.
[37] Guidelines, Part 2, sections 1.2, 20 and 22.
[38] Guidelines, Part 2, p. 115.
[39] Guidelines, Part 2, pp. 120 –121.
[40] *Supra*, note 12.
[41] Guidelines, Part 2, pp. 122 – 127.

PART 2 – ANNEXE 1: ASSESSMENT OF UPSTREAM GREENHOUSE GAS EMISSIONS[42]

Équiterre offers three suggestions for improving Annex 1. (Also, please note that the correct English spelling is "annex", not "annexe").

First, with respect to the requirement that the proponent present its upstream GHG assessment in a "separate report, Équiterre recommends that this separate report be submitted at the same time as the Impact Statement.

Second, for the requirement in Part A for the proponents to include GHG emissions in CO2 equivalent ("CO2eq") figures, we strongly recommend that the proponent present these emissions figures not only as total GHGs in CO2eq, but also present a breakdown of these emissions by specific, component GHGs (e.g., carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons and sulphur hexafluoride). The breakdown information is important for tracking specific GHGs such as methane.

Third, in the final paragraph of the Annex, first sentence, we see another instance where framing of the issue should be adjusted. Specifically, the phrase "…<u>how additional upstream emissions are consistent</u> with current GHG projections and policies" should more properly be written as "…whether additional upstream emissions are consistent with current GHG projections and policies". This modification, while small, is important in order to avoid the appearance of presuming any conclusions in advance about project emissions.

Conclusion

Équiterre thanks the Agency for this opportunity to provide comments on the Tailored Environmental Impact Statement Guidelines and hopes that our input proves useful to the Agency in ensuring the accuracy and quality of the information provided by the proponent and considered by the review panel for the Gazoduq Project. We look forward to additional engagement with IACC concerning this project.

[42] Guidelines, Part 2, pp. 128 – 129.