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July 15, 2020

**Re: Tilbury Phase 2 LNG Expansion Project invitation for public comment,  
Ref # 80496**

Dear Sir or Madam,

We are writing to express our serious concern with the Tilbury Phase 2 LNG Expansion Project, proposed by FortisBC. We represent a network of Indigenous, settlers and newcomers in Canada working with people of faith or conscience all over the world for ecological justice and human rights. This project increases risks from fracking, undermines Canada's progress on reducing greenhouse gas emissions, threatens the health and safety of communities, and undermines the rights of local First Nations.

First, KAIROS is deeply concerned about the upstream impacts of this project associated with fracking. It is estimated that 2,800 new fracking wells are needed for this project. Fracking raises significant social and ecological justice concerns related to the rights of Indigenous peoples, public health, air and water contamination, groundwater depletion, and the triggering of seismic activity. These new wells will use an intense amount of freshwater. The water that is contaminated in the process will end up underground or in tailings ponds and removed from the local water cycle, threatening local drinking water, habitats, and fishing grounds.

Fracking also increases the risk of methane leakage. A recent study of BC's active and abandoned gas wells revealed that "almost 11 percent of all oil and gas wells had a reported leak, together releasing 14,000 cubic metres of methane per day.<sup>i</sup> Methane is a greenhouse gas that is roughly 30 times more potent than carbon dioxide over the short-term.<sup>ii</sup>

Furthermore, the Canadian Association of Physicians for the Environment (CAPE) reports that 84% of public health studies on fracking find evidence of hazard, risk, or adverse outcomes.<sup>iii</sup> In addition to the risks from air and water contamination, fracking increases greenhouse gas emissions contributing to climate change, which the World Health Organization calls the biggest health threat of our time.<sup>iv</sup>

The FortisBC project is incompatible with British Columbia's emissions targets and would undermine Canada's ability to achieve the emissions reduction targets required to meet our Paris Climate Accord commitments. According to a September 2016 study by Oil Change International, 85% of known reserves of oil, gas and coal must remain in the ground to have a 50% chance of limiting global warming to 1.5°C. The study concludes that "no new oil fields, gas fields, or coal mines should be developed anywhere in the world."<sup>v</sup> The downstream impacts of this project on climate change need to be considered over the lifespan of this project.

The Tilbury expansion project poses significant risks to community safety. The proposed location is opposite a storage terminal for flammable jet fuel, in BC's prime earthquake-liquefaction zone, and in the path of a narrow commercial and recreational shipping lane of freighters, tugs, barges and aircraft. The Society of International Gas Terminal and Tanker Operations, strongly recommends against locating LNG facilities in such narrow, crowded waterways.<sup>vi</sup>

Furthermore, the proposed expansion poses significant risks to the Fraser river watershed. The Fraser river is in crisis and cannot sustain the additional pressure from this project. The project poses risks to critical habitat for salmon and southern resident killer whales in the Salish Sea and undermines the rights of local First Nations who rely on healthy fishing grounds for food and cultural practices.

In consideration of these concerns and those expressed by local First Nations, physicians, and others, we urge you to reject this project.

Sincerely,

**Beth Lorimer**

Ecological Justice Program Coordinator  
KAIROS: Canadian Ecumenical Justice  
Initiatives

**Janette McIntosh**

KAIROS BC-Yukon Regional  
Representative & KAIROS  
Metro Vancouver Member

**Ruth Walmsley**

KAIROS Ecological Justice  
Circle Member & KAIROS  
Metro Vancouver Member

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<sup>i</sup> <https://thenarwhal.ca/ten-per-cent-of-northeast-b-c-oil-and-gas-wells-leak-more-than-double-the-reported-rate-in-alberta-new-study/>

<sup>ii</sup> <https://www.sciencedaily.com/releases/2014/03/140327111724.htm>

<sup>iii</sup> <https://cape.ca/wp-content/uploads/2018/02/1.Fracking-Flyer-V1-Courtney-Howard-April-2017.pdf>

<sup>iv</sup> <https://www.who.int/globalchange/global-campaign/cop21/en/>

<sup>v</sup> [http://priceofoil.org/content/uploads/2016/09/OCI\\_the\\_skys\\_limit\\_2016\\_FINAL\\_2.pdf](http://priceofoil.org/content/uploads/2016/09/OCI_the_skys_limit_2016_FINAL_2.pdf)

<sup>vi</sup> <https://lngtankersafety.org/>