



WILDERNESS
COMMITTEE

ONTARIO OFFICE

207 - 425 Queen Street W.
Toronto, ON M5V 2A5

Ph: (416) 849-6520

WildernessCommittee.org/Ontario

VANCOUVER • VICTORIA • WINNIPEG • TORONTO

July 13, 2022

Impact Assessment Agency of Canada
22nd Floor, Place Bell
60 Elgin Street , Ottawa ON
K1A 0H3

Re: Comments on the Initial Project Description for the Eastern Power Inc Power Plant Project,
IAAC File Number 83696

The Wilderness Committee is a national charity dedicated to protecting wilderness, defending wildlife, and fighting for strong climate action. We are writing to express our concerns regarding Eastern Power Inc's proposed new gas power plant in Ontario, south of Sarnia, the so-called "Hydrogen Ready Power Plant". We urge the Minister of the Environment to use his discretion to reject this new fossil fuel burning electricity production project on the basis that it will cause unacceptable environmental impacts within federal jurisdiction, specifically an increase in greenhouse gas (GHG) emissions that is inconsistent with Canada's 2030 Emissions Reduction Plan and the targets of the Canadian Net-Zero Emissions Accountability Act .

Failing immediate rejection, we strongly urge the IAAC to conduct a full impact assessment (with a Review Panel) to determine the project's compatibility with reaching net-zero electricity supply in Canada by 2035, a key element of the Government of Canada's plan to achieve its Paris climate commitments. In addition to climate impacts, an appropriate assessment of endangered species and migratory birds is required due to the proximity of the project to an important wetland, the provincially designated and protected Bickford Oak Woods Conservation Reserve.

Climate Impacts

Eastern Power is seeking a contract from Ontario's Independent Electricity System Operator (IESO) to build a new 600-megawatt (MW) gas-fired power plant that will generate, according to the initial project description, 4,295,783 net tonnes of emissions over its 25-year lifespan. This amount of carbon pollution is inconsistent with Canada's climate targets, but it is also likely a gross underestimation as it relies on unfounded and unrealistic assumptions regarding emissions savings from phasing in a hydrogen/methane gas blend as hydrogen becomes available. The proponent assumes the plant will use 20% hydrogen by 2031 and 65% by 2041, however there is neither justification for nor commitments to this assumption. Furthermore, the project does not propose to use or generate "green" hydrogen and there's no

evidence that the blue hydrogen used will have a low-carbon emissions profile, to the contrary, [studies suggest blue hydrogen could create more emissions than a gas-fired plant.](#)

Ontario is not on track to meet its own weak emissions reduction target for 2030 according to a [2021 report by the province's auditor general](#), and its energy policies are inconsistent with federal climate commitments. Currently, the IESO forecasts GHG emissions from gas-fired electricity to increase over 600% by 2040 (compared to 2017 levels). The Wilderness Committee is among more than 60 groups and 30 municipalities that have called on the Ontario government to phase out gas-fired power by 2030 and the IAAC must step in to reject any project that will increase emissions in the province.

Ontario has many better options to keep it's lights on. Specifically, by investing in energy efficiency, wind and solar energy, energy storage and by purchasing renewable electricity and storage services from Hydro Quebec, Ontario can move to a zero-carbon electricity grid. IAAC assessments of this and any other proposed fossil-gas plant must include full assessments of alternatives.

Wildlife impacts

An IAAC assessment is also necessary given the proximity of the project's footprint and the site itself to the Clay Creek Woodland Area of Natural and Scientific Interest ("ANSI") and the Bickford Oak Woods Wetland Complex, which is a Provincially Significant Wetland. Up-to-date data on migratory birds and species at risk presence in these ecologically significant areas is required, as the proponent relies on a study that is over 10 years old. Again, Ontario's environmental policy cannot be relied upon to safeguard potential species at risk as another Auditor General [report](#) revealed that the province's Ministry of Environment, Conservation and Park's systems and processes for approvals facilitate and enable harm to species at risk and their habitats.

For these important reasons the Wilderness Committee believes the Eastern Power Inc gas plant project proposal is not in the public interest as it would undermine Canada's climate commitments and its approval would open the door for more gas plant proposals instead of actual zero carbon energy production. We recommend:

- a) the immediate rejection of this project
- b) Or, failing an immediate rejection, that the Impact Assessment Agency examine conduct a full impact assessment

Sincerely,



Katie Krelove
Wilderness Committee Ontario Campaigner

