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**RE: Fast Acting Natural Gas Power Generation Facility – Marshdale and Salt Springs**

As physicians and healthcare providers representing the Canadian Association of Physicians for the Environment (CAPE) in Nova Scotia, we are submitting our concerns regarding the proposed fast-acting natural gas power generation facilities for Marshdale and Salt Springs in Pictou County, submitted by IESO Nova Scotia.

CAPE is a national non-partisan, physician-led organization with over 36,000 supporters and regional committees in 9 provinces, including Nova Scotia. We bring an evidence-based and health-focused approach to the intersecting issues of environment, health, and social justice.

For the purposes of this submission, CAPE Nova Scotia will address and refute the proponent's assumption that the construction and operation of these 300 MW gas power generating facilities in Marshdale— for a minimum of 30 years—pose negligible risk to the health and wellbeing of Nova Scotians.

## What Is Natural Gas?

While the industry frequently uses the term "natural gas" to suggest a clean or organic energy source, this phrasing is a marketing descriptor rather than a scientific one. From a medical and environmental health perspective, it is more precise to identify the substance by its primary chemical component: methane (CH<sub>4</sub>).

Therefore, below we refer to methane gas and the fast acting methane gas power generating facilities.

Methane is a supercharged greenhouse gas that is well known to accelerate global heating.

## Burning fossil fuels is the primary cause of climate change<sup>1</sup>

This is no longer a matter of serious debate. The United Nations, the World Health Organization, the International Energy Agency, and the Canadian government have all issued warnings and reports calling for the rapid reduction of burning fossil fuel and a transition to renewable energy. Their reports and statements underscore the grave dangers posed by the escalating climate crisis, biodiversity crisis, and air pollution—and their cascading effects on human health and mortality.

## Health Effects Arising from Climate Change

The warming climate in Nova Scotia is already resulting in preventable injury, illness, and death. National data confirms that climate change is a primary driver of health effects related to rising temperatures, extreme heat, and the expansion of zoonotic diseases.<sup>2</sup>

- **Extreme Heat and Respiratory Health:** In Canadian cities, extreme heat increases mortality rates by 2% to 13%.<sup>3</sup> Furthermore, air pollution from fossil fuel combustion and increasing wildfire smoke already causes approximately 15,300 premature deaths in Canada annually.<sup>4</sup>
- **Infectious Diseases:** Warming temperatures have facilitated the northward expansion of ticks, making Lyme disease a permanent and growing health threat in our region.<sup>5</sup> In just the last five years we have seen the emergence of two other tick-borne infections in Nova Scotia: anaplasmosis and babesiosis.
- **Mental Health and Displacement:** The devastating floods and wildfires Nova Scotia has experienced are not just infrastructure crises; they are mental health crises. We see spikes in PTSD, anxiety, and depression following these events.

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<sup>1</sup> [Causes and Effects of Climate Change | United Nations](#)

<sup>2</sup> Berry, P., & Schnitter, R. (Eds.). (2022). *Health of Canadians in a Changing Climate: Advancing our Knowledge for Action*. Health Canada

<sup>3</sup> Ibid

<sup>4</sup> Health Canada. (2022). *Canada's Changing Climate: Implications for Health and Well-being*.

<sup>5</sup> Berry, P., & Schnitter, R. (Eds.). (2022). *Health of Canadians in a Changing Climate: Advancing our Knowledge for Action*. Health Canada

## Impact on Healthcare Delivery and Infrastructure

Extreme weather events and wildfires, which are becoming more frequent because of climate change, also directly impact healthcare workers, their clinics, and hospitals. When wildfires occur, smoke infiltration can compromise the air quality within medical facilities, and evacuation orders can force the closure of community clinics, disrupting essential care. Severe flooding and storms can block transit routes, preventing healthcare staff from reaching their shifts and delaying emergency response times. These disruptions create a secondary health crisis where the system's capacity to respond is diminished exactly when the community's need is greatest.<sup>6</sup>

## Why does this project worry us?

There is no doubt that Nova Scotia is, as is the rest of the world, experiencing the adverse effects of climate change. Given the release of methane associated with the processes of its exploration, extraction, transportation, and use, Nova Scotia should not be developing technologies that rely on fossil fuel extraction to support electricity generation. Additionally, the exploration and extraction of methane frequently rely on fracking, with clearly demonstrable short and long term adverse health effects.

## Local Health Risks of Methane Gas Plants

Burning methane gas doesn't just fuel climate change. It comes bundled with toxic pollutants that threaten our health. These include volatile organic compounds, particulate matter, and smog-forming gases that can lead to premature death, breathing and heart problems, and even cancer. A report from the Health and Environment Alliance estimates that gas plant emissions cause 2,800 premature deaths in Europe as well as ~15,000 cases of respiratory illness including lung cancer, COPD, and childhood asthma, and incurring health and productivity costs in excess of 8.7 billion euros (US\$9.11 billion USD)<sup>7</sup> Even though the air quality modeling in the environmental assessment shows levels of pollutants below nationally recommended thresholds, there is no guarantee that any level of these toxins is safe for humans.<sup>8 9</sup>

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<sup>6</sup> Berry, P., Enright, P., et al. (2022). "Adaptation and Health System Resilience." In *Health of Canadians in a Changing Climate*.

<sup>7</sup> Health and Environment Alliance. Health and Environment Alliance. 2022 [cited 2024 Dec 31]. False fix: the hidden health impacts of Europe's fossil gas dependency. Available from: <https://www.env-health.org/false-fix/> in *Cradle to Grave: The Health Toll of Fossil Fuels and the Imperative for a Just Transition*. September 2025 by the Global Climate and Health Alliance <https://climateandhealthalliance.org/cradle-to-grave-the-health-toll-of-fossil-fuels-and-the-imperative-for-a-just-transition-2nd-edition/> accessed February 9 2026

<sup>8</sup> [Health Impacts of Air Pollution in Canada: Estimates of morbidity and premature mortality outcomes – 2021 Report](#)

<sup>9</sup> [Mortality and Morbidity Effects of Long-Term Exposure to Low-Level PM2.5, BC, NO2, and O3: An Analysis of European Cohorts in the ELAPSE Project - PubMed](#)

## Summary

In this submission, we focus on the direct health implications of methane, primarily as they relate to its role in driving climate change. However, we are equally concerned about the risks associated with hydraulic fracturing (fracking) should there be any intention to source gas locally within Nova Scotia.

Until the full scope of the supply chain is disclosed and a comprehensive health risk assessment is conducted, this project should be paused.

Sincerely,

<Original signed by>

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Chair, Canadian Association of Physicians for the Environment – Nova Scotia (CAPE NS)