



## ENVIRONMENT north

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Ontario Energy Board  
Toronto, Ontario

Thank you for engaging the public in a discussion of the Energy East pipeline project.

Environment North is a regional non-governmental charitable organisation based in Thunder Bay and has a multi-year history on providing comments to governments on a number of environmental issues concerning northwestern Ontario. We have been involved with environmental education, community sustainability and community advocacy since 1972.

Our three main reasons for concern in regards to the construction of an Energy East pipeline are as follows:

1. The construction of a pipeline facilitates expansion of Canada's oil production and invests in new fossil fuel infrastructure. These are both incompatible with Canada's responsibility to reduce greenhouse gas emissions
2. The risk of a spill in the Great Lakes watershed.
3. The benefits do not outweigh the consequences, especially for Ontario.

We have reviewed the *Environmental Guidelines for the Location, Construction and Operation Of Hydrocarbon Pipelines And Facilities in Ontario 6th Edition, 2011* and we will elaborate on our concerns in the context "cumulative effects and alternatives" discussed in the guidelines.

### **1. Expansion of Oil Production (primarily for Alberta Bituminous Sands)**

Greenhouse gas emissions (GHG) would result from the construction of the pipeline itself. However, a far greater contribution of GHG emissions would occur from the years of increased oil production that the project would facilitate.

The 2014 Intergovernmental Panel on Climate Change (IPCC) report confirms that the next few decades are critical in avoiding more dangerous climate change. Mitigation of greenhouse gas production is essential.

A 2012 report from the International Institute of Sustainable Development based in Winnipeg states “the oil and gas sector looks unlikely to be able to achieve [GHG] reductions at levels consistent with Canada’s 2020 target of 17 per cent below 2005 levels. The expected growth of the sector to 2020 dominates any improvements in emissions intensity as a result of policy.”

A recent Pembina Institute report suggests the increase in greenhouse gas emissions that would occur in the oil industry with construction of the Energy East Pipeline would negate the gains achieved in Ontario by closing the coal-fired power plants.

Cumulative effects of a project are typically defined within a particular area and time frame. However, with greenhouse gas emissions the effects are distributed globally and occur for a number of decades. It is inconceivable not to consider the increased greenhouse gas emissions that would result from the Energy East pipeline given the current global climate crisis.

Environment North recognises that most municipalities and most provinces, certainly Ontario, understand the seriousness of climate change and are working hard to mitigate greenhouse gas emissions. Yet the federal government promotes a major expansion of the fossil fuel industry without demonstrating how our national GHG targets (insufficient as they are) can be met.

An alternative plan would ensure that the oil industry has strict greenhouse gas emission standards. Canada would be able to meet current targets as well as incrementally increase GHG emission reduction targets as soon as possible so that they are in line with those advised by scientific research.

## **2. Risk of a Spill in the Great Lakes Watershed**

The immediate and long term damage from a significant oil spill in the Great Lakes Watershed would be devastating. One only need consider the recent Kalamazoo spill or the lingering effects of the Exxon-Valdez spill. Given pipeline history it is a question of when and not if.

A new oil pipeline in the Great Lakes watershed, which is already environmentally stressed, increases the risk of contamination of drinking water resources and natural ecosystems and economies such as tourism and fishing.

Many communities are supporting the Energy East because they are rightly concerned about the risks associated with rail transport of oil through communities. However, there is no certainty that construction of the pipeline will significantly decrease rail traffic.

## **3. A Question of Benefits for Whom**

Our third concern is that the main benefits of this project are for the oil production and refining industry. Communities and ecosystems all along the route and in the downstream watersheds are exposed to the risk of a spill. The contribution to greenhouse gas emissions by expansion of the oil production industry is detrimental to the global climate system.

Alternatively, investments could be made into innovative and clean energy technologies as well as into infrastructure involving the building, industry, transportation and electricity sectors. This would provide benefits for a number of different industries across the country. Clean energy technologies provide greater economic diversification and employment that will benefit current generations and those to come.

### **“Fifteen Years Left”**

There is broad agreement that it is critical to seriously tackle GHG emissions and related climate change issues now, and not defer to future generations to grapple with, when costs may be exponentially higher. [The New York Times](#) featured a recent Op-Ed on the need to reduce emissions:

*“...Avoiding that fate will require a reduction of between 40 percent and 70 percent in greenhouse gases by mid-century, which means embarking on a revolution in the way we produce and consume energy. That’s daunting enough, but here’s the key finding: The world has only about 15 years left in which to begin to bend the emissions curve downward. Otherwise, the costs of last-minute fixes will be overwhelming. “We cannot afford to lose another decade,” says Ottmar Edenhofer, a German economist and co-chairman of the committee that wrote the report. “If we lose another decade, it becomes extremely costly to achieve climate stabilization...”*

All provinces need to work now towards a rational energy policy that reduces greenhouse gas emissions, accounts for the costs of carbon, supports clean energy development and energy conservation and protects water resources. Energy East is unhelpful for these important goals.

Thank you for this opportunity to comment.

Graham Saunders  
President - Environment North