

**Sent via email**

Teresa Morris  
Project Assessment Manager  
Environmental Assessment Office  
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Victoria, BC V8W 9V1

Dear Mrs. Morris:

**Re: WesPac Tilbury Marine Jetty Project**

Thank you for the opportunity to comment on the Valued Components to be included in the environmental assessment for the WesPac Tilbury Marine Jetty Project (the “Project”). We request that you subject the Project to a robust environmental assessment that includes:

- Explicit consideration of the upstream impacts associated with the Project;
- Explicit consideration of how the Project is compatible with Canada’s support for keeping global temperature increases below 1.5 C;
- Explicit consideration of how the Project is compatible with the recently submitted Climate Leadership Team recommendations.

The inclusion of upstream environmental impacts associated with the extraction, processing and transmission of the natural gas needed to supply the Project makes sense because the liquefaction process is only feasible if all of the other components of the supply chain are in place. Pembina’s B.C. LNG and shale gas scenario-planning tool (recently developed with modelling support from Navius Research) demonstrates that the majority of impacts associated with the Project are from upstream development.<sup>1</sup> These would be excluded if the review only focuses on the LNG terminal for the Project. For example, an additional 1410 wells may need to be drilled in northeast B.C. to produce the natural gas needed to supply the Project over a 30-year life span. Those wells could require 22.5 billion litres of freshwater for hydraulic fracturing. And the cumulative wellhead-to-waterline greenhouse gas emissions from the Project over 30 years could total 48 million tonnes of CO<sub>2</sub>e — 68% of which could come from upstream sources. In 2030, the Project’s annual greenhouse gas emissions could total 1.5 million tonnes CO<sub>2</sub>e.<sup>2</sup>

Canada’s support at the recent Paris climate conference for limiting climate change to 1.5 C above pre-industrial levels is relevant to the Project. To achieve such a world, global demand for all fossil fuels, including natural gas, must drop. Modelling has shown that to limit temperature increases to 2 C, the global demand for natural gas must peak around 2030, and drop below current levels by mid-century.<sup>3</sup> Limiting temperature increases to 1.5 C will further decrease the demand for natural gas. This will have implications for the viability of new investments in long-lived natural gas infrastructure. We encourage

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<sup>1</sup> The tool is available at: <http://www.pembina.org/pub/BCShaleTool>. The environmental impacts will depend on assumptions such as the source of the natural gas and the strength of environmental policy. The assumptions used to produce the estimates in this letter are: LNG demand is determined by the WesPac LNG project coming online in 2020; non-LNG shale gas development is constant at 2014 levels; the 2030 source of gas is 15% Conventional, 65% Montney, and 20% Horn River Basin; and current environmental policies.

<sup>2</sup> Our analysis just considers wellhead-to-waterline impacts. We leave it to other groups to comment on the need for downstream assessment.

<sup>3</sup> Pacific Institute for Climate Solutions, *LNG and Climate Change: The Global Context* (2014).  
<http://www.pembina.org/pub/lng-and-climate-change-the-global-context>

the government to apply an evidence-based approach to assessing how the Project is compatible with Canada's stated goal of limiting global temperature increases to 1.5 C.

The environmental assessment should also consider how the Project addresses the recently released recommendations from the Climate Leadership Team (CLT), including increased electrification of natural gas processes and improved methane management.<sup>4</sup> The government asked the CLT to provide recommendations for the next phase of the Climate Action Plan that allow B.C. to achieve its legislated climate targets. If the Project does not adequately satisfy the recommendations, the Project may not be compatible with B.C.'s official climate goals.

In this context, we believe that the public interest is best served by having the Project undergo a robust environmental assessment that includes the above-described components.

Yours sincerely,



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<sup>4</sup> Climate Leadership Team, *Recommendations to Government* (2015).  
[http://engage.gov.bc.ca/climateleadership/files/2015/11/CLT-recommendations-to-government\\_Final.pdf](http://engage.gov.bc.ca/climateleadership/files/2015/11/CLT-recommendations-to-government_Final.pdf)