Dear: Catherine McKenna, Minister of Environment and Climate Change.

cc: Honourable Justin Trudeau, Prime Minister  
Honourable Jim Carr, Minister of Natural Resources  
Honourable Jody Wilson-Raybould, Minister of Justice and Attorney General of Canada  
Canadian Environmental Assessment Agency

From: International Climate Change Scientists and Climate Policy Experts

Date: May 26, 2016

Re: Unjustified adverse greenhouse gas impacts of the Pacific Northwest LNG proposal.

We the undersigned scientists and climate experts request that you reject the proposed Pacific Northwest (PNW) LNG project due its significant adverse environmental effects from greenhouse gas (GHG) emissions. PNW LNG would be one of the single largest point source emitters in Canada. When upstream emissions\(^1\) are added to facility emissions\(^2\), the project would add between 18.5 and 22.5% to British Columbia’s (BC) total GHG emissions. This would make it virtually impossible for BC to meet its GHG emission reduction targets, and would undermine Canada’s international climate change commitments. As scientists and climate experts, we are deeply concerned about the effects of climate change in this country and abroad. We conclude:

- **The project poses serious risks to climate change targets.** The GHG emissions from the project and the associated upstream activities (fracking, processing, transport, etc.) are significant and represent material challenges to BC and Canada towards meeting their climate change targets. The challenges to BC and Canada's efforts to reduce GHG emissions will be exacerbated because of two issues: 1) the international agreement on climate change reached in Paris will require Canada to increase its ambition to reduce GHG emissions over time (and this requirement is embedded within the Vancouver Declaration signed by the Prime Minister and the premiers on March 3); and 2) the methane emissions from upstream gas included in the draft Environmental Assessment report likely underestimate the true contribution of emissions from the project (see below). Importantly, the Proponent’s analysis of the Canadian environmental policy context is no longer accurate; Canada has renewed its commitment to reducing GHG emissions to 200 million tonnes below current levels by 2030.

- **GHG emissions from the project are likely underestimated.** The GHG emissions reported by PNW LNG and included in CEAA’s draft assessment\(^2\) underestimate the total emissions released over the full life cycle of the project. For example, the quantification of methane emissions from upstream extraction and transportation activities included in the draft Environmental Assessment report are predicated based on a leakage rate of \(\sim 0.28\%\), which has not been verified by field studies. In contrast, the U.S. Environmental Protection Agency uses a methane emissions rate of 1.33% for comparable processes of the supply chain (i.e., production, processing, and transmission)\(^3\). A more conservative estimate of methane leakage should have been included in the proponent’s impact assessment, and serves to grossly underestimate the total GHG emissions from the project.

- **There is inadequate climate policy to reduce impacts for the project.** The climate change policies currently in place are not adequate to require better practices and get BC and Canada
on track for their climate change commitments. The ongoing freeze in BC’s carbon tax and exemptions in carbon tax coverage for non-combustion emissions, such as methane venting and leakage, fundamentally undermine the province’s ability to encourage reductions in GHG emissions from the project and associated extraction activities.

- **There is no evidence that LNG from the project will replace coal in Asia.** The Canadian Environmental Assessment Agency (CEAA) acknowledged that the use of natural gas could potentially reduce GHG emissions internationally if it replaces the consumption of coal and oil. The Agency, however, ultimately rejected this argument because it was “beyond the scope of the EA for the Project”. LNG will also likely displace nuclear power, renewables, and natural gas from other sources in many importing countries. There are many locations where LNG consumption would be additional to coal consumption, instead of replacing it. Importantly, GHG emissions from fracking, transport, liquefaction, and regasification significantly reduce LNG’s GHG benefits over coal.

The Canadian Environmental Assessment Agency has found that the carbon emissions of the proposed PNW LNG terminal and associated upstream natural gas development would be “high in magnitude, continuous, irreversible and global in extent.” (p.39). Their research finds the project will emit at least 11.5 million tonnes of CO₂ per year, not including downstream emissions when the gas is burned in Asia.

Honouring the commitment Canada made in Paris to limit global warming to well below 2.0 degrees above pre-industrial levels will require a massive effort to reduce emissions. We must begin by rejecting plans that would increase GHG emissions and lock us in fossil fuel extraction for decades to come.

We therefore request that you withhold the environmental assessment certificate for PNW LNG, and take urgent action to reduce our greenhouse gas emissions.

Sincerely,

**Signed** (institutional affiliations are provided for identification purposes only):

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