

September 6, 2016

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Vancouver, B.C. V6R 2M6

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Joyce Murray
Member of Parliament for Vancouver Quadra
206 – 2112 West Broadway
Vancouver, B.C. V6K 2C8

Re: Kinder Morgan pipeline approval process

Dear Ms. Murray,

I am concerned about the present course of the Liberal Government in the matter of the Kinder Morgan pipeline expansion. I am therefore writing to you as my Member of Parliament. I enclose a paper that explains my concern about the adequacy of the process followed by the government during the past six months.

In British Columbia, pipelines are broadly opposed because of the risk of pipeline failure. Along the Pacific coast – including in many aboriginal communities – the risks posed by heavy oil tanker traffic and marine spills drive much of the opposition. Those risks are profoundly important. I focus here, however, on the reasons for questioning the approval of the project based on the evidence we have about GHG emissions and disruption of the climate system. As you well know, the repeated refusal of the National Energy Board (NEB) to admit and consider any evidence (including any scientific evidence) about the impact of upstream emissions from oil sands operations in Alberta – including the NEB's July 23, 2104 ruling in the Kinder Morgan inquiry – elicited deep dismay from informed Canadians. During the last election, in response to public anger about the NEB process, the Liberal Party (and individual Liberal candidates) promised the electorate that a Liberal Government would replace the NEB process or reform it.

On January 27, 2016, the Liberal government announced a modification of the pipeline approval process. The existing NEB process for the Kinder Morgan and Energy East projects has not been changed, but the government offered a new procedure to assess

“upstream emissions”. When the government published details of the new procedure on March 19, 2016, it promised that the new process would provide Canadians with an assessment “of the project’s potential impact on Canadian and global emissions”.

In your Spring 2016 Newsletter, speaking about the accomplishments by the new Liberal Government since the election last October, you informed your constituents:

“Since then we [the Liberal Government] ... created a principled supplementary environmental review for pipeline projects rushed through the flawed National Energy Board process”.

I appreciate that your Newsletter comment appeared before the report was completed. The Kinder Morgan assessment report was published on May 19, 2016.

A “principled” emissions review can only be one that provides Canadians with the essential information we need to make an informed decision – so that we fully understand the consequences of project approvals now that will increase our annual level of CO₂ emissions during the next fifteen years.

There is no dispute about the consequences of the path we are currently on. The atmospheric carbon concentration level is 400 ppm; during the past four years it has increased by an average 2.4 ppm per year. The scientific evidence (which the Government of Canada says it accepts) tells us that a level of 450 ppm CO₂eq will take us above the 2°C threshold. The International Energy Agency warns us unequivocally in its 450 Scenario that absolute reductions in global oil production *must start by 2020* if we are going to keep within the 2°C limit.

The Kinder Morgan report affirms that oil sands production will continue to grow between now and 2040. The rationale for building new pipeline capacity is to enable that growth. The report has adopted the NEB’s view that global oil consumption, especially in Asia, will remain strong for at least another twenty-five years. Based on that forecast of growing global oil demand, the report adopts the NEB’s forecast that *oil sands production will increase from the 2014 level of 2.4 million bpd to 4.8 million bpd by 2040* – a doubling of production over the next twenty-five years (see the Kinder Morgan assessment report, section B.2.1 at p. 15, “Canada’s Oil Supply Growth”).

The Kinder Morgan expansion, if built, will have the capacity to transport an additional 590,000 bpd, which is 25% of the proposed total expansion of oil sands production between now and 2040. This project is a major step down an unforgiving pathway.

The fundamental question we must ask before we go down that pathway is *can we achieve a 30% cut in Canada’s total emissions by 2030, down to 524 Mt, if emissions*

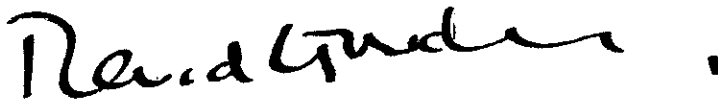
from expanding oil sands production keep rising. That is the question a principled assessment would be bound to answer.

The Kinder Morgan report does not answer that question. It doesn't even ask the question. The report is silent about whether we can obtain large enough reductions *from other economic sectors* to obtain the deep cuts we need and to offset the continued increases in oil and gas sector emissions. *The report provides no data or analysis to demonstrate that could be done.* It almost certainly cannot be done. It would require that all of our other economic activities cut their emissions by more than 45%.

The Kinder Morgan report does not tell Canadians whether the further expansion of oil sands production enabled by approval of the Kinder Morgan expansion is consistent with our commitment to cut our emissions to 524 Mt by 2030.

It would be helpful if you would explain your position about the adequacy of the Kinder Morgan emissions assessment, released by the Liberal Government almost four months ago on May 19, 2016.

My question is this: what more information do you need – information you do not already have – to enable you to tell us whether you support the approval of the Kinder Morgan project, or whether you support a decision to reject it?



David Gooderham

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Enclosure