

November 17, 2022

Cc:

Finance Minister Chrystia Freeland,
Minister of Foreign Affairs Melanie Joly,
Indigenous Affairs Minister Marc Miller,
Minister of Immigration Refugees and Citizenship Sean Fraser,
Vice Chancellor for Germany and
Minister for Economic Affairs and Climate Action Robert Habeck

RE: Enforce COP26 commitments with Canada and Germany

To the Honourable Steven Guilbeault, Minister of Environment and Climate Change and the Honourable Jonathan Wilkinson, Minister of Natural Resources Canada:

We, the organizations below, are highly concerned about the impacts of the proposed East Coast LNG projects. As Canada's Ministers of Environment and Climate Change and Natural Resources you play a pivotal role in determining how Canada achieves its energy and climate goals.

At present, the government's position on LNG is far from clear. We would like to draw your attention to a prominent study released by Climate Action Tracker, and carried many times on Canadian broadcast media. Massive gas expansion risks overtaking positive climate policies documents the looming climate disaster in the renewed rush to build yet more fossil gas infrastructure ([source](#)).

Eastern Canada is already feeling the effects of climate change, with Hurricane Fiona, the second largest hurricane to hit the east coast in three years having severe impacts. Prime Minister Trudeau affirmed that the severity of Fiona's damage is a product of climate change.

We cannot have a government that stands on the side of climate destruction when it comes to LNG. Canadians from coast to coast have already demonstrated they strongly oppose new fossil fuel infrastructure and [believe climate](#) needs to play a strong role in any decision about approval or rejecting new LNG facilities.

It seems particularly cruel that after Atlantic Canadians experienced devastating extreme weather, the federal government is musing publicly about pathways to approving LNG projects that would blow federal and provincial GHG emission reduction targets out of the water-enabling the reckless growth of fracked gas production in Canada ([source](#) and [source](#)). A new report has revealed that global LNG export capacity is set to increase 35% by 2027, led by

countries including Canada ([source](#)). The International Energy Agency (IEA) has cautioned that fossil fuel infrastructure cannot keep expanding in a 1.5 degree world, a world Canada committed to preserve through the Paris Agreement ([source](#)). According to the IEA, gas is no longer seen as a transition fuel ([source](#)). A UN advisory group, led by former Environment and Climate Change Minister Catherine McKenna established to prevent green-washing, released a report at COP27 including the recommendation that any region with a net zero target should not build or invest in new fossil fuel supply ([source](#)).

On October 11, Deputy Minister Freeland stated in a speech delivered at the US think-tank, the Brookings Institution, that we owe it to our European allies to fast track energy export projects. East Coast LNG projects will not help Ukraine or solve Europe's energy challenges, and will contribute to the destruction of our planet ([source](#)). This irresponsible and dangerous rhetoric from the government will work against a just transition to truly renewable energy, at great cost to everyone ([source](#)).

In the 2015 election Justin Trudeau promised that, if the Liberals became government, pipeline expansion applications would have a robust climate change lens added to the process. When the government approved the twinning of the Trans Mountain Pipeline, it promised that in future applications there would be a climate change lens applied to projects undergoing the impact assessment. Climate-concerned Canadians are still waiting for the climate lens to be applied to LNG and the associated impact assessments.

The government has stated that LNG projects will need to meet certain defined criteria to be approved and that LNG projects will not circumvent regulatory and assessment processes. We need these statements to be backed by action and transparency on what these criteria will be.

So far with East Coast LNG projects, it would appear that your government's position is not much different than the "application streamlining" of the Harper government, against which the Liberal Party campaigned. During your and Minister Steven Guilbeault's time leading Environment and Climate Change Ministers, the Canadian Impact Assessment Agency has reaffirmed that an Impact Assessment is not required for the Goldboro LNG project- despite the considerable climate change effects of a liquefaction plant never having been considered by the Agency.

Minister Wilkinson, the government needs to immediately recognize and give effect to the legal reality that the *Impact Assessment Act* requires any proposed LNG project to undergo federal impact assessment, in which all impacts of the project and all phases of its associated emissions are considered fully. Ministers of the Crown need to support the Minister of Environment and Climate Change in commencing the long-overdue impact assessment process for the Goldboro, NS project and commit immediately to conduct impact assessments for the Repsol and LNG NL projects. In this way, the Canadian government will finally begin to implement its long-promised climate lens to assess proposed fossil fuel projects.

During COP26, Canada and Germany joined other governments in committing to "end new direct public support for the international unabated fossil fuel energy sector by the end of 2022" ([source](#)). The Canadian government has also committed to "encourage further governments, their official export credit agencies and public finance institutions to implement similar commitments into COP27 and beyond."

During an interview in October 2022, Hon. Minister Wilkinson highlighted the high economic hurdles related to the realization of East Coast LNG projects, but indicated that Canada would consider fast-tracking permitting processes if Germany is willing to pay a “premium” for LNG ([source](#)). The interview quote above would ask Germany to go against its COP26 commitments and could jeopardize any development or improvement intended for the current COP27 and beyond.

Hon. Ministers Wilkinson and Guilbeault, we call on your government to stick to the COP26 commitments by ending the support for fossil fuel projects abroad and support other signatories (such as Germany) in doing the same. During COP27 and after, Canada should work together with Germany to convince other countries worldwide to join this coalition to end public support for international unabated fossil fuel investments.

Sincerely,

Canadian groups/NGOs:

Canadian Association of Physicians for the Environment

Climate Action Network - Réseau action climat Canada

Coalition for Responsible Energy Development in New Brunswick (CRED-NB)

The Council of Canadians

Ecology Action Centre

Environnement Vert Plus

Greenpeace Canada

My Sea to Sky

New Brunswick Anti-Shale Gas Alliance (NBASGA)

Nova Scotia Fracking Resource and Action Coalition (NOFRAC)

RAVEN

Sierra Club Canada Foundation

Shift: Action for Pension Wealth & Planet Health

Stand.earth

Tall Cedar Consulting

German groups/NGOs:

Abgefrackt Bündnis Weidener Becken gegen Fracking

Andy Gheorghiu Consulting

Arbeitskreis Fracking Braunschweiger Land

BI „No-Fracking“ im Erdgasfeld Völkersen

BI Saubere Luft Ostfriesland

Berliner Wassertisch

BUND Kreisgruppe Steinburg

Bürgerinitiative Kein CO2 Endlager

Deutsche Umwelthilfe

German Climate Alliance Against LNG

IG Schönes Lünne

NABU Wilhelmshaven

Netzwerk Energiedrehscheibe Wilhelmshaven

Urgewald





GREENPEACE