

February 11, 2025

To: Steven Guilbeault, Minister of Environment and Climate Change

CC: Terrence Hubbard, President, Impact Assessment Agency of Canada

Re: Designate the Pathways Alliance's CO2 Transportation Network and Storage Hub for federal impact assessment

Dear Minister Guilbeault,

We, the 38 undersigned organizations, call on you to exercise your discretion to designate the Pathways Alliance's CO2 Transportation Network and Storage Hub under section 9(1) of the Impact Assessment Act, as requested by Beaver Lake Cree Nation, Cold Lake First Nations, Frog Lake First Nations, Heart Lake First Nation, Kehewin Cree Nation, Onion Lake Cree Nation, and Whitefish (Goodfish) Lake First Nation #128, and separately, as requested by the Athabasca Chipewyan First Nation (collectively, the "Requesting Nations").

The Pathways Alliance is proposing a massive carbon capture and storage (CCS) project to address carbon pollution from the oil sands industry in northeastern Alberta. It would be the largest CCS project in Canada and one of the biggest in the world. Allowing a project this size to proceed without an environmental assessment is unacceptable.

[The Requesting Nations have outlined](#) the following potential non-negligible adverse impacts within federal jurisdiction, including impacts on:

- health, safety, social and economic conditions;
- traditional land use and cultural integrity;
- safety of the surrounding waterways, plants and animals; and
- Reserve lands and traditional territories.

We are furthermore concerned that the environmental footprint, as well as the safety and health hazards associated with CCS infrastructure – and this project in particular – have been largely overlooked.

- **Carbon dioxide leaks can pose a serious public health risk.** Carbon dioxide (CO₂) is an asphyxiant. At high concentrations, it can cause rapid loss of consciousness and can be lethal for humans and wildlife. When a CO₂ pipeline ruptured in Mississippi in 2020, 300 people were evacuated and 45 people had to be hospitalized.
- **Threats to groundwater.** An increase in CO₂ in underground aquifers like the Beverly Channel aquifer may leach lead and arsenic contained in rocks, creating an environmental hazard if drinking water sources are affected. Australia banned carbon storage in the country's largest groundwater basin to avoid this type of irreversible harm.
- **Additional stress to watersheds.** Carbon capture requires large amounts of freshwater. Although there is no publicly available data on the water impacts of equipping oilsands facilities with CCS, studies show that when power plants are fitted

with CCS, their [water withdrawals increase between 25% and 200%](#). The Athabasca River watershed in northeastern Alberta is already under significant stress from climate change and industrial water use.

- **Carbon capture aggravates air pollution.** Industrial sites with carbon capture will have increased emissions of air and water pollutants, such as fine particulate matter, which will exacerbate health impacts on regional communities.
- **The financial and liability risks related to carbon storage are highly likely to be transferred from the private sector to the public.**

We share the same concerns raised by the Requesting Nations regarding the gaps in Alberta's regulatory and consultation process. [Alberta's decision to refuse an environmental assessment](#) of the project is further evidence that the government has no desire to protect the environment, nor the health and safety of its residents. The federal government shouldn't make the same mistake.

Additionally, the Pathways Alliance is refusing to share information about the risks with impacted First Nations and other frontline communities. The communities that would bear all of the risks from the project deserve to have their questions answered.

An environmental assessment is a normal part of due diligence and a standard step across Canada when assessing projects of this size. It's an opportunity to look at the project as a whole and ensure all environmental, economic, health and social impacts – as well as impacts on the inherent, Aboriginal, and Treaty rights of Indigenous Peoples – are identified before a project is approved.

The federal government has an obligation to review the impacts of projects that are receiving government handouts – and this project is expected to get billions from the federal government. The entire price tag is estimated at \$16 billion. Governments have already offered to pay for 50 per cent of those costs – but Pathways companies are asking taxpayers to shoulder two thirds of their costs.

Fossil fuel companies are pushing carbon capture and storage because it means they can keep producing oil and gas while appearing to address climate change. However, CCS is a dangerous distraction from genuine climate action. With a long track record of expensive failure after expensive failure, it is a costly and inefficient means of mitigating emissions, especially compared to renewable energy, which is rapidly scalable, already cost-effective with prices still falling, and able to deliver immediate emissions reductions by displacing fossil fuels. This massive project, cutting through hundreds of kilometers of Alberta, would only capture a quarter of the carbon dioxide emissions from the oilsands facilities involved.

[Lobbyists from the Pathways Alliance privately asked](#) your government to skip a federal assessment and fast track the project – despite its massive safety, health and environmental risks. This is totally unacceptable.

A project this size and with this many risks needs to undergo a comprehensive review before it can be approved.

Sincerely,

Environmental Defence Canada
National Farmers Union
Keepers of the Water
Alberta Wilderness Association
David Suzuki Foundation
Canadian Association of Physicians for the Environment
Calgary Climate Hub
Climate Action Network - Réseau action climat Canada
Nature Canada
Équiterre
Nature Québec
Greenpeace Canada
Council of Canadians - Calgary Chapter
KAİROS: Canadian Ecumenical Justice Initiatives
Stand.earth
Climatefast
Seniors for Climate Action Now!
Grandmothers Act to Save the Planet (GASP)
Citizens for Public Justice (CPJ)
Toronto 350
Seniors for Climate Action Now - Ottawa
Friends of the Earth Canada
Canadian Health Association for Sustainability and Equity (CHASE)
Clean Air Partnership
Manitoba Eco-Network
Climate Emergency Unit
Oil Change International
re•generation
Green 13
Canadian Engaged Buddhism Association
Citizens' Climate Lobby Canada
Canadian Unitarians For Social Justice (CUSJ)
Vegans & Vegetarians of Alberta
Women's International League for Peace and Freedom-Canada
Climate Reality Project Canada
Friends of Fish
Climate Justice Saskatoon
Leadnow