



To:

Macky Tall
Kimberly Baird
Michael Bernstein
Jane Bird
Janis Byrne
Michele Colpron
Bruno Guilmette
Elisabeth Hivon
Hari Subramaniam
Patricia Youzwa

CC: The Honourable Gregor Robertson, Ehren Cory, Frédéric Duguay, Sashen Guneratna, Evelyn Joerg, Hillary Marshall, Steven Robins, Hillary Thatcher, Charles Todd,

Dear Board Members,

We, the undersigned Civil Society Organizations, are writing to express our serious concerns about the Canada Infrastructure Bank (CIB) providing financing through debt or equity to the proposed Ksi Lisims floating liquefied natural gas (LNG) terminal. This project presents significant legal, environmental and public risks that render it contrary to public interest.

A cornerstone of a nation-building project is the extent to which it advances the interests of Indigenous peoples, contributes to clean growth and to meeting Canada's objectives with respect to climate change. These are criteria set out in the '[Building Canada Act](#)'. Measured against these standards, Ksi Lisims falls short, and cannot therefore be deemed a project of national interest. It falls short of the spirit and intent of the [mandate](#) which has been governing CIB since its inception: building infrastructure in the public interest which makes substantial reductions to Canada's greenhouse gas emissions.

Multiple title holders and impacted Indigenous communities and First Nations do not provide their consent for either the Ksi Lisims LNG terminal or the Prince Rupert Gas Transmission Line feeding the terminal. Neither the [Lax Kw'alaams Band](#) nor [Metlakatla First Nations](#) have consented to the project, and filed separate federal judicial reviews challenging federal approval. Most Gitksan house groups have not consented, with [one hereditary chief filing a provincial challenge](#) against the Prince Rupert Gas Transmission Line. The Gitanyow Hereditary chiefs have [challenged the project in court](#) over threats to salmon populations, climate impacts, inadequate consultation and absence of Indigenous consent. Two members of the [Nisga'a](#)



[Nation](#) have filed a lawsuit in the B.C Supreme Court, alleging inadequate consultation and financial risks.

The environmental and climate impacts of Ksi Lisims would be significant. Canada's only operating LNG facility is currently producing more air pollution from flaring than any other facility in the world, flaring [45 times more](#) than its permits allow. Between July and December 2025 alone, the facility flared [more than 350 million cubic metres](#) of methane gas, far exceeding 2024's biggest global offender: Nigeria's Bonny Island LNG terminal, which flared less than 250 million cubic metres over an entire year. Regulators have failed to step in and address this problem.

Ksi Lisims would pollute our environment at every stage of operation. It would leak methane, a greenhouse gas 80 times more powerful than carbon dioxide over a 20 year span, at extraction, transportation and processing. The estimated upstream emissions would be at minimum 3-4 MT CO₂e per year, not including underreporting. These emissions would make it even harder for Canada to meet its climate commitments, which [we are significantly off-track in meeting](#). The downstream emissions associated with LNG produced at Ksi Lisims surpass 32 MTCO₂ per year, equivalent to the annual emissions from [8 coal power plants](#). Meanwhile, the net positive investments made to date by the bank, across extensive [clean energy and energy reduction projects](#), contribute to [almost 10 MT CO₂](#) in avoided emissions per year. Ksi Lisims would wipe out the excellent contributions the bank has made to reducing Canada's emissions.

The Canada Infrastructure Bank has a well-deserved reputation for financing clean power projects, and driving significant emissions reductions. As of March 2025, the CIB had invested almost \$5 billion in clean power with projects including the fully Indigenous owned [Wicehtowak Solar commercial power project](#), and the Indigenous co-owned [Oneida Battery Storage Project](#). Ksi Lisims, on the other hand, is a foreign-owned, [foreign-built](#) and legally risky project that has failed to attract private financing for nearly a decade. To date, it only has gas buyers secured for one third of project capacity, leaving serious questions about investor and buyer appetite for the project. And with construction of the floating terminal in South Korea, most of the economic benefit would not be captured by Canada.

There may well be immense pressure on Canadian institutions to provide support right now for the Government's 'Nation Building Agenda', but the financial case deserves significantly more attention. Ksi Lisims may not produce a single shipment of LNG [until 2029 at the earliest](#). By then, the unstoppable momentum of the energy transition will have taken us further toward a clean energy future. Price volatility, [supply disruptions and permanent gas demand destruction driven by global conflict](#) will have further eroded the investment case for new LNG capacity.



Canadian institutions asked to step in where private capital has failed to materialize should treat that invitation as a warning signal, rather than a gap to be filled on patriotic grounds.

The CIB has a responsibility to uphold its mandate to deliver nation-building clean power and affordable energy to Canadians across the country. The Ksi Lisims LNG Export Terminal would run counter to the meaning of a true nation building project, and the strong reputation of the CIB. Given the substantial and interlinked legal, financial, and environmental risks related to Ksi Lisims LNG, we strongly recommend that the CIB:

1. **Decline to provide project financing** for Ksi Lisims LNG;
2. **Deny general corporate financing** to Ksi Lisims LNG's developers;
3. **Consult directly with impacted communities**, especially when those communities are Indigenous communities, prior to making any decisions on project financing. The Government of Canada has a duty to consult Indigenous groups when a project or action might adversely impact potential or established Aboriginal or treaty rights. This duty, which is a legally required by federal agencies, has been reaffirmed by the Supreme Court of Canada in several cases, including [Haida Nation v. British Columbia \(Minister of Forests\)](#), [Taku River Tlingit First Nation v. British Columbia \(Project Assessment Director\)](#), and [Mikisew Cree First Nation v. Canada \(Minister of Canadian Heritage\)](#);
4. **Require that clients have obtained the Free, Prior, and Informed Consent** from all impacted Indigenous communities, as outlined in B.C. law via the Declaration on the Rights of Indigenous Peoples Act.

We look to you to continue your valued leadership in financing Canada's energy transition and emissions reduction efforts, and resist pressure to support new fossil fuel infrastructure. Canada has an opportunity to advance Indigenous rights and further grow as a renewable energy superpower, but Ksi Lisims would be a significant step backward for Canada's clean energy future and its standing as a responsible infrastructure investor.

Yours Sincerely,

Environmental Defence Canada
Representing 240,217 Canadians

My Sea to Sky
Representing 35,000 Canadians

Shift: Action for Pension Wealth & Planet Health (a project of Makeway)



environmental
defence

Change Course

For Our Kids, Burnaby
Representing 200 Canadians

Seniors for Climate Action Now!
Representing 800 Canadians

Climate Justice Saskatoon
Representing 600 Canadians

Wilderness Committee
Representing 50,000 Canadians

Climate Justice Thunder Bay
Representing 5,000 Canadians

Climate Action Network Canada
Representing 200 Climate Organisations from across Canada

Stand.earth
Representing 1,000,000 Canadians

Dogwood
Representing 100,000 Canadians

Grandmothers Act to Save the Planet (GASP)
Representing 170 Canadians

Canadian Association of Physicians for the Environment
Representing 25,000 Canadians

David Suzuki Foundation

Greenpeace Canada
Representing 43,000 Canadians

Citizens for Public Justice (CPJ)

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Fax: 416-323-9301 email: info@environmentaldefence.ca
www.environmentaldefence.ca



environmental
defence

Representing 3,500 Canadians

Climate Reality Project Canada
Representing 1,600 Canadians

Climate4Palestine Toronto
Representing 60 Canadians

Ateliers pour la biodiversité

Regroupement Vigilance Énergie Québec (RVÉQ)
Representing 200 Canadians

CCC-AC - Collectif de convergence citoyenne d'Ahuntsic-Cartierville
Representing 200 Canadians

Citizens' Climate Lobby Canada
Representing 6,000 Canadians

Say No to LNG

Mobilisation environnement Ahuntsic-Cartierville

Southern Alberta Group for the Environment

Calgary Climate Hub
Representing 700 Canadians

Teachers for Future Turtle Island
Representing 5000 Canadians

Decolonial Solidarity
Representing 11,342 Canadians

Solidarité Environnement Sutton

Les AmiEs de la Terre de Québec
Representing 3,000+ Canadians



BC Divest Now

For Our Kids

Representing 8000 Canadians

Total of 33 Organizations Representing 1,604,859 Canadians

International Partners

urgewald

Oil Change International

AnsvarligFremtid (Denmark)

groundWork

Andy Gheorghiu Consulting

MARBE SA, Costa Rica

Center for Oil & Gas Organizing

Jubilee Australia Research Centre

Rivers & Mountains GreenFaith

Rainforest Action Network (RAN)

Fundación Ambiente y Recursos Naturales (FARN)

Quest For Growth and Development Foundation

Climate Conversation Brazoria County

Carrizo Comecrudo Tribe of Texas

Earth Ethics, Inc.



environmental
defence

Climate Defenders

Mother Rise Up

350Hawaii

Gulf South Fossil Finance Hub

South Durban Community Environmental Alliance

ReCommon

GreenFaith

FoE Japan

Pacific Environment

Waterkeeper Alliance

Parents4climate

Climate Action Campaign at the Humboldt UU Fellowship

Total of 27 Organisations Representing Africa, Asia, Oceania, North America, South America and Europe