



Stephanie Bolt

www.ottawariverkeeper.ca

Defending the Ottawa River, Protecting Our Communities.



OUR MISSION

Ottawa Riverkeeper is a watchdog and an independent voice for the Ottawa River, providing leadership and inspiration to protect, promote and improve its ecological health and future.

We work collaboratively:

- **Across political boundaries at the watershed scale;**
- **To promote compliance with standards and regulations;**
- **To reduce pollution and restore biodiversity;**
- **To create a future where we can safely swim, drink and fish our local waterbodies**



- 1) Our organization is concerned with the potential impact of the proposed pipeline on the entire Ottawa River watershed area;
 - a. The proposed pipeline could have an impact on the watershed from North Bay all the way to Montreal, where the river flows into the St. Lawrence River;
 - b. The mainline pipeline that currently exists crosses many tributaries to the Ottawa River, including the Montreal River, the Madawaska River, Mississippi River, Rideau River, and South Nation River;
 - c. The Project Description mentions that new crossings of the Madawaska and Rideau Rivers will be installed, so there will be construction on these crossings;
 - d. The newly constructed portion of the pipeline will cross the Ottawa River itself, just east of Hawkesbury, upstream from Montreal;
 - e. The Ottawa River watershed provides drinking water for the relatively large municipalities of North Bay, Ottawa, Gatineau & Montreal, as well as many smaller ones, including Stittsville, along the route of the proposed pipeline;
 - f. In addition to surface water for drinking water, there are important aquifers in the watershed that provide drinking water for many communities;
 - g. The Ottawa River is home to great biodiversity, including more than 300 species of birds and 96 species of fish;
 - h. The Ottawa River is a world class recreation destination, as evidenced by the fact that hundreds of thousands of people swim, fish, paddle, sail, and powerboat in the river.



ENVIRONMENTAL CONSIDERATIONS

1. Leaks and spills due to pipeline failure:

- Pipeline integrity
- Leak detection
- Emergency management
- Quality management

2. Climate change

The impacts we see in connection with the proposed pipeline in the Ottawa River watershed are primarily environmental considerations, namely the potential of leaks and spills of crude oil or, worse, diluted bitumen (“dilbit”), due to a pipeline failure. Such leaks and spills could be caused by many things, such as damage to the pipeline by third parties, internal corrosion, weld seam failures, or natural disaster. They could result in irreparable damage to the water quality of wetlands, watercourses, and/or waterbodies in the Ottawa River watershed; and serious harm to fish and wildlife, and fish and wildlife habitat in the watershed. We are also concerned with the climate change implications of the proposed project.

- 1) We think the OEB should seriously assess in its report to Ontario’s Minister of Energy the impacts of this project on pipeline safety and the natural environment in Ontario, in particular:
 - a. **Pipeline integrity:** What is the risk to Ontarians of a rupture in the pipeline, in particular in the converted section? We know this pipeline is approximately 50 years old and was not originally designed to carry crude oil/dilbit, or operate at the pressure required to move the oil/dilbit through the pipeline. We know that pipeline conversions such as this one are a fairly new practice and one big rupture on a converted pipeline has occurred and been much publicized, in Mayflower, Arkansas in March 2013, which endangered local water bodies. And we know that industry and its regulators have concerns about the integrity of these pipelines.
 - b. **Leak detection:** What is the risk to Ontarians of leaks along the pipeline that go undetected for any period of time? We know that with the Enbridge rupture in Kalamazoo, Michigan, many hours (approx. 17) passed before the company learned of the spill, and that was because a municipal utility worker reported the spill, even though alarms had gone off in company headquarters. We know that Energy East will have a leak detection system for the pipeline. But will it provide sufficient assurance against harm to the waters in the Ottawa River watershed?

c. Emergency Management:

- i. The Ottawa River is an interprovincial river, and thus subject to regulation and oversight by the federal government as well as the provinces of Ontario and Quebec. Municipalities would also, of course, be involved in any cleanup of a spill. Has the Ontario government been given enough assurance by Trans Canada that a spill or rupture could be contained by a well-coordinated response before unacceptable damage is done to the waters, wetlands, and habitat of the Ottawa River watershed? Also, are Trans Canada's emergency management plans tailored to the different needs and players involved in the different regions through which the pipeline passes?
- ii. What amount of money is Trans Canada willing to devote to a cleanup in the event of a spill? Obviously it can be very expensive to clean up such a spill. We know Enbridge has already spent more than \$1 billion to clean up the dilbit that spilled into the creek that was a tributary of the Kalamazoo River in July 2010 and, due largely to the properties of bitumen, that cleanup is still not considered complete. Are Ontario's municipalities going to be on the hook for the cost of the cleanup operations? We can imagine they don't have the money or other resources to manage this; is it their responsibility to bear the burden for this risk?

d. Quality Management: This relates to the design, manufacture, and construction for the new build section of the pipeline. Are adequate safety measures being taken to protect the newly constructed section of pipeline from spills, particularly where it crosses bodies of water? Are shut off valves being installed in the pipe before and after crossings? Are double pipes being used for water crossings? Should these and other precautions be required to make the risks inherent in this project acceptable to Ontario?

2) **Climate Change:** We think the Ontario government should give due consideration in its report to the implications of this 40 year project to Canada's contribution to global greenhouse gases. The Pembina Institute has published an overview of the climate considerations of this pipeline project and they have shown that the oil required to fill this pipeline would significantly increase Canada's greenhouse gas emissions. This is at a time when we are past needing to show serious action to reduce these emissions, as the most recently released Intergovernmental Panel on Climate Change (IPCC) report has made very clear. This is a separate concern of ours, from the ones related to pipeline spills, but an important one, as an environmental organization working to protect and preserve the ecological health of the Ottawa River watershed. We think it is an issue that must be addressed in the context of the approval of this pipeline.

Conclusion: There is the potential for a damaging oil spill, or certainly more than one, to occur in Ontario, into the Ottawa River watershed during the estimated 40 year life of this project. Furthermore, if this project is approved it will take Canada even further away from meeting its climate objectives than it already is. We want to urge the Ontario government to take these risks seriously in coming up with its position on the project, and in its report to the NEB.