



Honourable John Horgan  
Premier of British Columbia  
PO Box 9041 Stn Prov Govt  
Victoria, British Columbia  
V8W 9E1

February 13, 2018

Dear Premier:

I am writing about the Government of British Columbia's announcement proposing to set up a scientific advisory panel to develop recommendations regarding potential restrictions on current and increased diluted bitumen ("dilbit") transport. CEPA sees this proposal as unnecessary and duplicative of previous work conducted on this issue.

There is a significant body of research that proves the transportation of dilbit does not pose an increased risk to pipeline infrastructure or the environment. Accredited studies in this respect include but are not limited to the following:

- [Properties, Composition and Marine Spill Behaviour, Fate and Transport of Two Diluted Bitumen Products from the Canadian Oil Sands](#), Government of Canada, 2013;
- [Effects of Diluted Bitumen of Crude Oil Transmission Pipelines](#), National Academy of Sciences, 2013;
- [Comparison of the Corrosivity of Dilbit and Conventional Crude](#), Alberta Innovates Technology Futures, 2011;
- [The Behaviour and Environmental Impacts of Crude Oil Released into Aqueous Environments](#), Royal Society of Canada, 2015; and
- [Dilbit Corrosivity](#), Penspen, 2013.

In addition to the above research, CEPA is sponsoring a study conducted by SL Ross Environmental Research Ltd. to further assess the behavior and response options for spills of conventional and unconventional oil. CEPA is also supporting another study through the International Institute for Sustainable Development – Experimental Lakes Area (a non-government organization) to examine the efficacy of oil spill treatment strategies on several types of shorelines. The results of these studies will be of critical importance to continually improving our members' world class spill preparedness and response capabilities.

We have been an active partner and collaborator with the B.C. government and other stakeholders on B.C.'s land-based spill preparedness and response enhancement initiative since 2012. Much of your government's announcement included regulatory intentions consistent with what had previously been discussed with stakeholders. However, the introduction of an additional scientific panel on dilbit and potential restrictions on additional dilbit movement were never part of the five-year consultation process and came as a surprise to those involved.



CEPA is unclear about what your government seeks to accomplish, given that extensive research has been conducted into the behaviour of dilbit and the nature of the product is well-understood. As an association representing an industry which is committed to continuous improvement and the highest standards of environmental performance we are eager to engage with the province on research that will continue to move the industry forward but governments must respect approvals that are in place and decisions that have already been made must be respected.

Regarding the Trans Mountain Expansion Project (TMEP), our opinion is that further study by the proposed advisory panel would not alter the decisions reached by the B.C. Environmental Assessment Office and the National Energy Board (NEB). The provincial certification and federal approval for the TMEP was achieved because of years of extensive regulatory reviews and consultations which included on the record research and evidence based evaluations about the fate and behavior of dilbit. The conclusions drawn by the NEB were that existing studies enabled sufficient modelling of the fate and behavior of dilbit for the purposes of spill response planning.

As you are aware, the federal approval for the TMEP contained 157 conditions which requires Kinder Morgan to regularly demonstrate compliance by filing updates with the federal regulator throughout the project lifecycle. Among other things, these conditions require that Kinder Morgan has established emergency preparedness and response exercise and training programs for the pipeline and terminals, and conducts full-scale emergency response exercises for scenarios which includes dilbit releases into Burrard Inlet. For these reasons, the federal government has publicly stated that the Trans Mountain Pipeline project "fits within Canada's climate strategy and meets the strictest environmental standards." The facts and evidence bolstering this statement have not changed.

Emergency response and management is a responsibility that industry takes very seriously. CEPA's members have committed to ongoing research and continuous improvements to meet the highest safety and environmental standards, now and into the future, to ensure the development of world-leading spill preparedness and response practices. I would welcome the opportunity to meet in person and discuss the previously mentioned research as well as industry led emergency management initiatives.

Yours sincerely,

Chris Bloomer  
President & CEO

c.c.:

Hon. Rachel Notley, Premier of Alberta  
Hon. Jim Carr, Minister Natural Resources Canada  
Hon. Catherine McKenna, Minister Environment and Climate Change Canada  
Hon. Michelle Mungall, Minister of Energy, Mines and Petroleum Resources, BC  
Hon. George Heyman, Minister of Environment and Climate Change Strategy, BC