

Good Day Ms. Kathy Preston, The Honourable Jonathan Wilkinson, Ms. Lee-Ann Hamilton, Indigenous Services Canada, Natural Resources Canada, Mr. David Bennett, The Honourable Steven Guilbeault, The Honourable Nathan Cullen, The Honourable George Heyman, The Honourable Pierre Poilievre, The Honourable Sonia Furstenu, The Honourable Gary Vidal, The Honourable Shannon Stubbs, The Honourable Diane LeBouthillier and The Honourable Kerry-Lynne Findlay,

I wish to draw your urgent attention to my request that you refuse the development of the Andion-Semiahmoo RNG Facility in South Surrey, BC on the following grounds:

1. the unacceptable risk to human health due to the pollutants and toxins expected to be emitted by this proposed Facility and this proposed Facility's proximity to homes, schools, retirement communities, health care centres, businesses, and recreational areas
2. the cumulative pollutant and toxic exposure of the community surrounding this proposed Facility, especially considering existing localized pollution produced by both the agricultural activities, and daily traffic idling and crossing the very busy Peach Arch border crossing

Under Section 82 of the Impacts Assessment Act, the Federal Government must determine whether a project is likely to cause significant adverse environmental impacts. As per Section 81 of the Act, the definition of "environmental impacts" includes changes to the environment and the impact of such changes on health. This legislation requires that the Federal Government must preserve the health of the people of Canada in a manner that benefits present and future generations.









The Federal Government is also required to consider cumulative effects from other existing activities within that same area as the proposed project: "In making an environmental effects determination, as a best practice, authorities should also consider the potential for cumulative effects. While an individual project may not have result in significant adverse environmental effects, it is possible that cumulative environmental effects may result from that project in combination with the environmental effects of other activities that have been, or will be, carried out."

<https://www.canada.ca/en/impact-assessment-agency/services/policy-guidance/projects-federal-lands-outside-canada/guidance-sections-81-to-91-impact-assessment-act.html#toc055>

In the document "Semiahmoo RNG GP Corp. FAQ Application Frequently Asked Questions on Metro Vancouver's Air Quality Regulatory Processes", Metro Vancouver provides a table (19) showing estimates of livestock farms/agricultural and traffic pollution known to exist within 5 km of the proposed site:

<https://metrovancover.org/services/environmental-regulation-enforcement/air-quality-regulatory-program/PermitApplicationDocuments/frequently-asked-questions-aq-regulatory-processes.pdf>

The table below, which tabulates the localized livestock farms/agricultural and traffic pollution identified by Metro Vancouver as already existing within the 5 km area surrounding the proposed Andion-Semiahmoo RNG Facility, shows the significant cumulative pollutive effect that this proposed Facility will have on surrounding communities.

Emissions (tonnes/year)	Semiahmoo RNG	Traffic at Peace Arch Border Crossing	All Livestock Farms within 5 km of Semiahmoo	TOTAL WITHOUT SEMIAHMOO RNG	% INCREASE WITH SEMIAHMOO RNG	INCREASE IN COMMUNITY EXPOSURE TO POLLUTION & TOXINS 
Volatile Organic Compounds	0.8	8.9	0.7 - 2.5	9.6 - 11.4	7% - 8%	EXPOSURE TO VOC'S UP TO 8% 
Ammonia	0.4	0.4	15 - 54	14.4 - 54.4	1% - 3%	EXPOSURE TO AMMONIA UP TO 3% 
Methane	35.8	0.4	46 - 120	46.4 - 120.4	30% - 77%	EXPOSURE TO METHANE UP TO 77% 
Hydrogen Sulphide	0.1	0	1.5 - 5.3	1.5 - 5.3	2% - 7%	EXPOSURE TO HYDROGEN SULPHIDES UP TO 7% 
Nitrogen Oxides	2.8	11.1	0	11.1	25%	EXPOSURE TO NITROGEN OXIDES UP 25% 
Sulphur Dioxides	0.5	0.1	0	0.1	500%	EXPOSURE TO SULPHUR DIOXIDES UP 500% 
<b>TOTAL</b>	<b>40.4</b>	<b>20.9</b>	<b>63.2 - 181.8</b>	<b>84.1-202.7</b>	<b>20% - 48%</b>	<b>INCREASE IN POLLUTION &amp; TOXINS UP 20% - 48% </b>

While the estimations of existing pollution and toxic emissions provided by Metro Vancouver in their FAQ's is not exhaustive, the area within 5 km of the proposed site is not industrial, other than the Semiahmoo First Nations Reserve land which does not currently house any industrial activities. Metro Vancouver did not include pollution estimates from the trains that run 24 hours a day along the White Rock waterfront, which would certainly be contributing to existing pollution. Other key sources of existing localized pollution outside of regular business activities, housing and normal community traffic include the livestock/agricultural activities surrounding the community as well as substantial daily traffic generated by the Peace Arch Border Crossing, which cuts directly through the community.

The above table shows that if this proposed Andion-Semiahmoo RNG Facility moves forward, it will significantly contribute to increasing the levels of pollutants and toxic emissions in the area, and therefore it cannot be argued that this proposed Facility will not cause significant adverse environmental (and therefore health) impacts.

Of additional concern, Andion-Semiahmoo RNG's pollution estimates are based on a report by Tetra Tech Inc. that was commissioned by Andion Global Inc., and relied heavily on data from an Italian facility that was using different equipment, feedstock, ambient temperatures, weather conditions, etc. It is unclear not only how this data has been qualified as being accurate for this proposed Facility in the South Surrey area, but also if these pollution estimates are entirely reflective of the 125,000 metric tonnes of feedstock that could be processed by this Facility annually as per the Permit Application. This data gap is particularly noticeable when reviewing Table 18 of Metro Vancouver's "Semiahmoo RNG GP Corp. FAQ Application Frequently Asked Questions on Metro Vancouver's Air Quality Regulatory Processes", and comparing the proposed Facility with the Seabreeze Facility, which processes 25% of the material and produces 25% of the RNG yet is producing almost the same amount of volatile organic compounds.

<https://metrovancover.org/services/environmental-regulation-enforcement/air-quality-regulatory-program/PermitApplicationDocuments/frequently-asked-questions-aq-regulatory-processes.pdf>

Lastly, there are legitimate questions regarding the experience and expertise of the developer and partner, Andion Global Inc., which has operated under countless company names and appears to have recently changed their corporate entity once again to Taurus RNG. The public cannot be expected to have any confidence in a corporate entity that has dozens of subsidiaries and entities, and the Government should not put human health and the protection of our environment in such uncertain hands.

<https://www.thecleanairalliance.org/news-andion-abrarty-martin-lof.html>

**I specifically request that you acknowledge my status as a "Concerned Person" for the purposes of this project assessment, and that I receive an answer as to why this project and the additional discharge of these pollutants and toxin emissions into the air in South Surrey and White Rock is not going to adversely affect my health and the health of the surrounding community.**

**I also wish to be kept informed of any change in the status of this project assessment.**

Kind Regards,

YourName

YourPostalCode

YourEmail