

From: [Dobos, Rob \(EC\)](#)
To: [Ronzio, Joseph \[CEAA\]](#); [Milton Logistics Hub Review / Examen Pôle Logistique de Milton \(CEAA/ACEE\)](#)
Cc: [Lusk, Sheryl \(EC\)](#); [Allan, Sheila \(EC\)](#); [Cavallaro, Kathleen \(EC\)](#); [Taylor, Mary \(EC\)](#); [McKay, Jennifer \(EC\)](#); [Puvananathan, Anjala \[CEAA\]](#)
Subject: RE: Milton Logistics Hub EA - Review of Additional Information Requirement Response
Date: July 13, 2016 11:35:21 AM
Attachments: [2015-001 Milton Logistics Hub -ECCC GHG Conformity Review -Jul 13-2016.pdf](#)

Please find attached comments from Environment and Climate Change Canada in response to this request.

Regards,

Rob Dobos

Manager, Environmental Assessment Section –Ontario, Environmental Protection Branch
Environment and Climate Change Canada / Government of Canada

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Gestionnaire de Section de programme d'évaluation environnementale de l'Ontario /

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From: Allan, Sheila (EC)
Sent: June 22, 2016 1:07 PM
To: Ronzio, Joseph (EC)
Cc: Lusk, Sheryl (EC); Dobos, Rob (EC); Cavallaro, Kathleen (EC)
Subject: RE: Milton Logistics Hub EA - Review of Additional Information Requirement Response

Joseph,

Thank you for providing ECCC with the opportunity to advise on the sufficiency of the *Milton Logistics Hub Report on Greenhouse Gases* to support a technical review of the project's predicted greenhouse gas emissions. Due to operational considerations, ECCC is unable to meet the requested timeline of July 4. We expect to provide a response to you by July 18.

Regards,

Sheila Allan

Senior Environmental Assessment Officer
Environmental Assessment Section–Ontario, Environmental Protection Branch
Environment and Climate Change Canada / Government of Canada

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From: Ronzio, Joseph (EC)
Sent: June 20, 2016 5:17 PM

To: Allan, Sheila (EC); Lusk, Sheryl (EC)

Subject: Milton Logistics Hub EA - Review of Additional Information Requirement Response

Sheila and Sheryl,

On June 17th the Agency received a response from CN to the additional information requirement #10 regarding greenhouse gas emissions from the Milton project. The information is attached to this email and will be available on the public registry for the environmental assessment.

As ECCC is the expert department, and this is new information that has not previously been reviewed, we request that you please review the information and provide any comments to the Agency by July 4, 2016. This request is further to the Agency's [previous request](#) to your department on January 14, 2016 with respect to the conformity review of the environmental impact statement.

I look forward to receiving your response.

Kind regards,

Joseph Ronzio

Panel Manager, Review Panels Division
Canadian Environmental Assessment Agency / Government of Canada
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Environment and Climate Change Canada Environnement et Changement climatique Canada

Environmental Protection Operations Directorate –Ontario Region
867 Lakeshore Rd.
Burlington, ON L7S 1A1

July 13, 2016

File no.: 2015-001

Joseph Ronzio, Panel Manager
Milton Logistics Hub Project
Canadian Environmental Assessment Agency
160 Elgin Street, 22nd Floor
Place Bell Canada
Ottawa, ON K1A 0H3

Dear Mr. Ronzio,

Re: Milton Logistics Hub—Report on Greenhouse Gases

In response to your request of June 20, 2016, Environment and Climate Change Canada (ECCC) is providing the following comments on the conformity of the *Milton Logistics Hub Report on Greenhouse Gases*, which was produced by Canadian National Railway Company (CN) for consideration by the Joint Review Panel.

As requested, ECCC has reviewed the report to determine whether it would enable the Panel to conduct a technical review of greenhouse gas (GHG) emissions associated with the proposed project. ECCC's review took into account Information Request #10, which was issued by the Canadian Environmental Assessment Agency to CN during the Environmental Assessment Impact Statement conformity review and states that CN is to provide:

- an estimate of the direct GHG emissions associated with all phases of the Project, as well as any mitigation measures proposed to minimize GHG emissions. This information is to be presented by individual pollutant and summarized in carbon dioxide equivalent units (CO₂e) per year;
- an estimate of the Project's contribution to provincial and national GHG emissions; and
- an analysis of the predicted GHG emissions of the proposed Project in combination with other past, present and reasonably foreseeable projects.

In general, ECCC finds that the *Milton Logistics Hub Report on Greenhouse Gases* provides much of the requested information but lacks some details that would otherwise assist the Panel in its technical review of the project.

Estimates of GHG emissions

The report presents the project's direct GHG emissions by individual pollutant and as carbon dioxide equivalent units (CO₂e) per year. It also presents a clear explanation of how GHG estimate values were obtained and includes the relevant data and calculations. For example, the number of pieces of equipment and their load factors, the number of hours per day the equipment will

operate, the emissions factors used and references for the emissions factors, are all supplied in Appendix A.

A list of recommended mitigation measures is included in Section 8.0 of the report; however, there is insufficient information to determine the extent to which the mitigation measures would reduce direct GHG emissions.

Recommendation:

ECCC recommends that, for the purpose of the technical review, CN explain how each of the mitigation measures proposed will mitigate GHG emissions. More specifically, we would ask that for each mitigation measure the proponent include: a quantification of GHG emissions reductions that would be achieved and a description of the intended procedures to ensure these measures are followed.

Estimate of the Project's contribution to provincial and national GHG emissions

The report clearly identifies the requested estimates of the project's contributions to provincial and national GHG inventories, and compares projections of the provincial and national GHGs with and without the project. ECCC considers this information sufficient.

Cumulative Effects Assessment

The report does not provide any cumulative effects assessment that explicitly takes into account other past, present and foreseeable projects, as was specified in Information Request #10. ECCC suggests, however, that the proponent's examination of the project's total annual GHGs in context of provincial and national emissions may be considered a means of accounting for the cumulative effects of GHG emissions from the project in combination with other past and current anthropogenic activities. ECCC has no specific recommendations regarding information requirements to further address the cumulative effects assessment of the project.

Thank you for the opportunity for ECCC to provide input to the conformity review of the *Milton Logistics Hub Report on Greenhouse Gases*. If you have any questions regarding these comments, please do not hesitate to contact me by email at rob.dobos@canada.ca or by phone at (905) 336-4953.

Sincerely,
<Original signed by>

Rob Dobos
Manager, Environmental Assessment Section

c.c.: M. Taylor, ECCC
J. McKay, ECCC
A. Puvananathan, CEAA