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The Honourable Steven Guilbeault, P.C., M.P.
Minister of the Environment and Climate Change
House of Commons
Ottawa, Ontario, K1A 0A6

February 14, 2024

Regulations Amending the Regulations Respecting Reduction in the Release of Methane and Certain Volatile Organic Compounds (Upstream Oil and Gas Sector)

Dear Minister Guilbeault:

We applaud the Government of Canada for the many steps it has taken to mitigate and prepare for climate change. The proposed amendments to the methane regulations can deliver significant reductions in greenhouse gas (GHGs) in a timely and cost-effective manner. Ambitious regulations, effective monitoring, and strict enforcement can produce significant and immediate health benefits for Canadians, while securing a viable future for our children.

We strongly urge the Government of Canada to:

- **Maintain the current strong leak detection and repair requirements (LDAR);**
- **Remove or severely restrict the many exceptions to the ban on routine venting and flaring;**
- **Shorten the compliance timelines to make them consistent with those required by the US Environmental Protection Agency;**
- **Ensure that potential health benefits are fully assessed for all oil and gas regulations; and**
- **Ensure that the Methane Centre of Excellence serves the need for a more coordinated and comprehensive measurement and quantification of emissions, better data analysis, greater transparency and knowledge-sharing, and that its oversight includes robust academic and civil society representation.**

The extraction, refining, and distribution of oil and gas releases methane, a climate pollutant that is 84 times more potent at warming the climate than carbon dioxide. The oil and gas sector is the largest source of GHGs in

Canada; responsible for 28% of GHGs emitted from human activity. Since 2005, emissions from this sector have increased by [15.5% to 194 million tonnes \(MT\)](#) in 2022.

[A 2016 air monitoring study](#) estimated that emissions from the Alberta oil sands creates 45-84 tonnes/day of airborne particulate matter; a quantity that rivals the 67 tonnes/day created by the greater Toronto area. [An air monitoring study](#) published in 2024 found that “total gas-phase organic carbon emissions” from the Athabasca oil sands exceed values reported by the oil industry by 1900% to over 6300%. The research team noted that these emissions, which contribute to concentrations of ground-level ozone and fine particulate matter in the air, exceed the total organic carbon emissions from all other human activity in Canada. With [air pollution producing 15,300 premature deaths per year](#) in Canada, these air monitoring studies raise significant concerns about the health impacts that the oil and gas sector may present for local communities and for distant communities that are downwind.

Clearly, there is a need for better monitoring and enforcement of emissions from the oil and gas industry as well as a need to assess the immediate health benefits that can be expected with the implementation of these regulations.

Sincerely,

Kim Perrotta, Executive Director, Canadian Health Association for Sustainability and Equity (**CHASE**)

Ian Culbert, Executive Director, Canadian Public Health Association (**CPHA**)

Thomas Bastien, Directeur General, Association pour la sante publique du Quebec (**ASPQ**)

Helen Doyle, Chair, Environmental Health Work Group, Ontario Public Health Association (**OPHA**)

Sande Harlos, President, Manitoba Public Health Association (**MPHA**)

Angela Haché, President, Public Health Association of PEI and NB (**NBPEI-PHA**)

Maya R. Kalogirou PhD RN, President, Canadian Association of Nurses for the Environment (**CANE**)

Gaby Kalapos, Executive Director, Clean Air Partnership (**CAP**)

cc: The Honourable Justin Trudeau, Prime Minister

The Honourable Jonathan Wilkinson, Minister of Natural Resources

The Honourable Mark Holland, Minister of Health