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Clean Environment Commission Presentation
Re: Louisiana Pacific Swan Valley OSB mill

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Good afternoon members of the CEC

My name is Susanne McCrea. I have been with the Boreal Forest Network for nearly ten years.

It is our opinion that the proposal that has been put before you from the Louisiana Pacific Swan Valley OSB mill does not contain adequate information from which to make a recommendation.

We have made written submissions, as have the Concerned Citizens of the Valley, which we have forwarded to the CEC, to both Conservation Minister Struthers and to Premier Doer detailing our objections to the terms of reference for this meeting.

While we recognize and appreciate the panel's attendance at community presentations, we are concerned that the process initiated by the Minister does not allow for full and meaningful input by the public. We will participate in the process to the best of our ability, however, we must respectfully express our objection to the process initiated by the Minister.

Our main objection, with these issues of process, lack of intervener funding, short notice, and limited public involvement, is that it does not serve the best interests of Manitobans, who have a right to ensure that the health of their families and northern neighbours is not compromised. It is not the way to ensure that the best science is revealed.

There are alternatives to this either, or option that has been put before you. Technologies exist now that did not at the time of this original license. They need to be explored.

Who we are:

The Boreal Forest Network is a non-profit environment and social justice group founded in 1996, based in Winnipeg and involved in campaigns across the global boreal forest.

We are a group that exists entirely on individual donations and a few small project grants.

I am the Executive Director of the Boreal Forest Network and founding member and director of the Boreal Action Project. We are member groups of the international pan-boreal, Taiga Rescue Network. I am also on the international board. The TRN is a network of organizations, and Indigenous Peoples across the global boreal.

TRN member groups are primarily from Scandinavia, Russia, Canada and Europe. There are also an increasing number of member groups from other parts of the world, including China, South America, Australia and Africa. These groups joined because a global marketplace, the domination of multi-national corporations and their influence on local economics, politicians, labour practises, and the ongoing violations by government and industry against Indigenous Peoples rights to plan, manage and control industrial activities on their traditional territories, gave us good reason to be in communication with one another.

When Louisiana Pacific first proposed to come to Swan River, in 1994, one of the things Swan Valley resident, Ken Sigardson, did was pick up the phone book and call the Greenpeace office, in Winnipeg. I was the director there at the time. It was then that a group us formed the Manitoba Future Forest Alliance, a group with no funding, to campaign along with Ken and the newly formed Concerned Citizens of the Valley, to address our concerns about the initial LP proposal.

LP had just been fined $11.1million by the Environmental Protection Agency (EPA), in the U.S., for falsely reporting how much pollution the

company was producing from OSB plants in the US. At the time this was the largest fine in EPA history. Although they topped it later, as you have heard from other presenters.

Along with the fine, LP installed the best available pollution abatement technology in 11 of its 13 OSB plants in the US. The technology was installed to deal with the tons of toxic pollutants being emitted, such as benzene, Volatile Organic Compounds (VOCs), phenols, formaldehyde, hydrogen cyanide and Methylene Diphenyl Isocyanate (MDI). The same chemicals the mill uses here in the Swan Valley.

The response of the company to this fine, at the time, did little to reassure us. I remember reading that it would not seriously effect their quarterly statement.

Many of these poisonous toxins are known carcinogens and pose a serious health risk to both the community and to workers at the plant who may be exposed to these chemical toxins. I understand that at one point the press room the board is made in was not even sealed to contain the toxics internally. The commission may enquire as to whether this is still the case.

BFN chose to present to you today because many people with concerns are intimidated about speaking up. It can be difficult to be on the opposite side of a neighbour or co-workers on a loaded issue like this. But, people do speak among themselves and we have heard many stories.

People do have a right to jobs, safe jobs where a profit cutting employer does not put them at the greatest risk of contamination. I would like to note that this extends to plant managers who are driven by performance expectations coming from higher up the corporate ladder. We heard LP say, yesterday, that they were competing even within the company with other LP mills.

There are alternatives to this either, or option that has been put before you. Technologies exist now that did not at the time of this original license. They need to be explored.

LP argued that in Canada, as opposed to the States, they were under no obligation to install pollution abatement technology in their Swan River plant, as there were no national ambient air quality standards in Canada. At the time citizens in Manitoba were outraged at LP's attitude

towards this important human health issue and argued effectively that Manitobans deserved no less protection than those in the US receive.

The reason that this mill has the RTO technologies where others, in Canada don't, is that concerned citizens took it upon themselves to become informed about the process of producing OSB and the potential health hazards and spent their own money to lobby the government and to present their findings to the CEC.

It takes courage to go up against a multi-national in a small town.

We know the result of the campaign of 1994. The CEC recommended the RTO technologies . They also made recommendations about air sample monitoring and the importance and value of public participation, with adequate funding, to inform the process of environmental licensing and to protect the public interest.

One of my objectives in making a presentation to you today is to stress the importance to community health and wellbeing that the decision before you represents. I have travelled here at my own expense, taking time away from other work and caring for my twelve year old granddaughter to ask you to make an objective recommendation that weighs all the facts and to use the precautionary principal.

Louisiana Pacific has submitted a proposal that we believe is deficient. We will provide full information on this and other expert opinion, commissioned without the financial advantage of intervener funding, to the CEC before the September 1st deadline.

Addressing Climate Change and Greenhouse Gas Emissions

We have heard from Louisiana Pacific that they will emit almost 12 thousand tons less greenhouse gases per year without the RTOs. The natural gas they burn to operate them would then no longer be needed. Yet, the main source of greenhouse gases in the OBS industry comes from the burning of waste wood used to produce the heat needed to make their product. How many tonnes of GHGs does this burning process emit and where do these figures come from? What is the total annual ammount of GHGs coming from this plant?
We need to know accurate total GHG annual emissions coming from this plant to make any judgement or comparison with other OSB plants, in the U.S. in areas where reporting will give us some data for that comparison. GHGs are a serious issue and if LP is genuinely concerned about them they need to report, and, ideally, be monitored, for total annual emissions for the mill.

There is a cap and trade system coming our way with the advent of the Western Climate Initiative, an agreement which Manitoba is a signatory to. The Western Climate Initiative was started in 2007 by the Governors of Arizona, California, New Mexico, Oregon and Washington

who signed an agreement to develop regional targets for reducing greenhouse gas emissions, to participate in a multi-state registry to track and manage greenhouse gas emissions among participating regions and to develop a market based program to reach their collective targets.

This information is taken from their website:

The Western Climate Initiative was built on existing greenhouse gas reduction efforts in the individual states as well as two existing regional efforts. In 2003, California, Oregon and Washington created the West Coast Global Warming Initiative, and in 2006, Arizona and New Mexico launched the Southwest Climate Change Initiative.

The Premiers of British Columbia, Manitoba, Ontario, and Quebec, and the Governors of Montana and Utah have since joined the original five states in committing to tackle climate change at a regional level.

> Participation in the WCI reflects the strong commitment of each Partner jurisdiction to take cooperative actions to address climate change and implement a joint strategy to reduce greenhouse gas emissions.

This system is still under development, but under it Louisiana Pacific may, for example, have an opportunity to show its commitment to reducing its carbon footprint by putting aside some of the remaining intact forested area in the Duck Mountain. Louisiana Pacific is the only remaining company that still has logging rights in a Manitoba Provincial Park.

Greenhouse gas emissions data comes from Environment Canada.

Each province collects emissions data and makes calculations for their province and submits the info to Environment Canada.

Large final emitters (LFE) need to submit emissions reports themselves. See http://www.ec.gc.ca/pdb/ghg/facility_e.cfm. I'm not sure how a company is identified as an LFE.

The methods for provincial data collection and for the LFE are set by the Intergovernmental Panel on Climate Change (IPCC) and United Nations Framework Convention on Climate Change (UNFCCC).

Here's more on LFE methodology:
http://www.ec.gc.ca/pdb/GHG/guidance/calcu_e.cfm

Currently, in Manitoba, those who emit more than 100kT (or 100,000 tons) of GHGs per year are considered Large Final Emitters.

Manitoba has 7 Large Final Emitters.

Koch Fertilizer, in Brandon
Manitoba Hydro, in Brandon
TransCanada Pipelines Ltd., in Rapid City
The Brady Landfill, in Winnipeg
Hudson Bay Mining and Smelting, in Flin Flon (now closed?)
Graymont West Canada, in Faulkner
The Summit Road Landfill, in Winnipeg

Together they represent 11.27% of the GHG emissions in the province and range from 734,005 tonnes at the highest level to 111, 615 tonnes on the low end. I bring this to your attention to put the claim of saving 12,000 tonnes of GHGs into perspective.

The large final emitters I mentioned rank from 82nd to 286th on a list of Canadian GHG emitting companies. These are the only publicly available stats for comparison.

Environment Canada will require companies who emit 50kT (kiloTonnes) of GHGs to report starting in 2010.

The WCI's reporting threshold is 10kT. The WCI process will start reporting 2010 data in 2011.

LETTER FROM CLIMATE CHANGE CONNECTIONS - MANITOBA ECO NETWORK

See: http://www.climatechangeconnection.org
See also: www.westernclimateinitiative.org
http://www.ghgreporting.gc.ca/GHG-GES/page15_c2.aspx#524

Toxics

Decisions about serious public health issues should not be political.

The Government of Manitoba appears to be poised to reverse a decision it made in 2007, when it rejected LPs request to increase benzene levels at this plant on the basis that the carcinogenic chemical benzene was too dangerous.

The toxics information provided to this commission by Louisiana Pacific is one of the areas we find deficient. As a result, The Boreal Forest Network and the Concerned Citizens of the Valley intend to provide the CEC with an expert review of this part of the proposal prior to the September 1st deadline.

Chemical Soup – LP has provided no information, for example, about the cumulative effects of exposure to these toxins. Nor, have they put them in context of other toxins that may be present in the local environment.

volatile organic compounds (VOCs) cause ground-level ozone and

smog;

hazardous air pollutants (HAPs), including cancer-causing agents;

phenols, toxic chemical compounds which are fatal in extremely small

amounts

methyl diphenyl diiscocyananate, (MDI), a toxic resin used by LP in

OSB construction is the chemical that blew up in the Bhopal Incident

that was referred to in Margaret Romak's presentation last night.

The Bhopal Incident was an industrial disaster that took place at a Union Carbide pesticide plan in the Indian city of Bhopal, in Madhya Pradesh, in December of 1984. The plant released 42 tons of MDI gas, exposing more than 500,000 people to toxic gases. The first immediate death toll was 2,259. Some people died in their beds. It was later estimated at more like 8,000-10,000 dead within 72 hours and recent estimates are that about 25,000 have died since from gas-related diseases.

The Bhopal disaster is often considered the worst industrial accident in our history.

See: International Medical Commission on Bhopal

I mention this to emphasis that these are dangerous chemicals and chemical combinations that we are evaluating pollution controls for. When we first began to look at MDI, back in '94, we discovered that a fire in a plant using MDI could have disastrous consequences.

Among the other dangerous carcinogens are *benzene* and potentially *formaldehyde.*

There are products that can replace, or reduce the use of

formaldehyde:

1. Adhesive system containing tannin for binding lignocellulosic ...

These adhesives suffer from a number of disadvantages. ... especially for OSB board manufacture, since most liquid aldehyde tannin adhesives ... Few OSB mills have been able to overcome the problems encountered in preparing an ... associated with increased free formaldehyde emissions resulting from the addition of ...

www.patentstorm.us/patents/7064175/description.html -

2. BASF no-added formaldehyde resins

Published: 23 February, 2009

With the recent implementation of California Air Resources Board (CARB) legislation limiting formaldehyde emissions, BASF has introduced the Lupranate M20 Series of products which are MDI-based resins that do not contain formaldehyde and thus do not generate formaldehyde emission during application.

BASF said that these products are a viable alternative for composite wood manufacturers seeking a more sustainable way of doing business.

3. Forest Products Society 63rd International Convention

June 21-23, 2009

SESSION 12:

Formaldehyde-Free and Ultra Low Formaldehyde-Emitting Adhesives for Bonding

Sponsor: FPS Adhesives Group

Session Chair: Kaichang Li, Associate Prof., Dept. of Wood Science & Engineering, Oregon State Univ., Corvallis, OR

Session Moderator: Kaichang Li

Preparation of Particleboard with a New Formaldehyde-Free Soy-Based Adhesive

Kai Gu, Grad. Research Assistant, and Kaichang Li, Associate Prof., Dept. of Wood Science & Engineering, Oregon State Univ., Corvallis, OR

Protein Hybrid Adhesives: Adhesive Performance, Formulation Latitude, and Chemical Structure

Joseph J. Marcinko and Anthony A.

Parker, Principal Scientists, Advanced

Mantua, Biopolymer Technologies, NJ

These technologies may be considered to replace the formaldehyde that is in use at the Louisiana Pacific mill today.

It appears that the risk of ALS is higher here than is the norm. Known chemicals used in the LP mill heighten the risk of developing this horrible disease. Why take the risk?

There are viable options for pollution controls for this mill.

It is time to examine what pollutions controls are most effective in 2009. It is not just a question of RTOs or nothing. When I heard the RTOs were offline I wondered if maybe it was time to see if there was now something better. I now know that there are other options (biofilters, etc., much information that has already been presented) to consider that may be as effective, or more, and even less expensive.

Economics

Advantages have been given to LP.

$5 million to install gas pipeline for LP.

Lowest stumpage rates in North America and the last remaining forest rights in a Manitoba provincial park.

They knew in 1994 that these RTOs had a shelf life and would need upgrading or replacing. If I knew, they obviously did. Why didn't they plan for it and save during the good years? The economic downturn they cite happened recently. They had almost 15 years.

Is it likely they will actually leave this forest while anything productive remains uncut in their license area? If they do, won't someone else move in?

Weyerhaeuser has left the OSB market leaving their share wide open.

You have heard from members of the Concerned Citizens of the Valley that market trends experts predict an upswing in 2010 and that LP boasts about the cost cutting measures they have taken to put themselves at a marketplace advantage.

NAFTA – in the U.S. where it sells much of its product – they are required to use RTOs or equivalent pollution abatement controls. Does cutting costs in this way represent a violation of the NAFTA agreement by making it cheaper to produce OSB in Canada?

Costs to human health and IPs rights

Dispersion will cover a wider area with higher stacks and an increase in emissions. Indigenous Peoples traditional territories may be threatened. Meaningful consultation should be taking place. Local economic activities, and the subsistence activities of Indigenous Peoples who hunt, trap and pick blueberries in this area, may be affected. This is something I have not even heard mentioned here.

I ask you now to listen to the words of Sophie Ledoux, who could not be here herself because of a family emergency.

I couldn't say it better myself, so I will close with Sophie's words and ask that this commission consider carefully what is best for all members of this community and make a thoughtful and sensible recommendation to Manitoba Conservation.

On a personal note

Many years ago when my son was a baby, I used to house sit for my friend's Grandparents, who lived near here in a remote and beautiful location. I thought for many years that I will eventually move out of the city. This valley and the surrounding area were at the top of my

list. I would now hesitate to move here because of my health concerns about its proximity to this mill. I would certainly feel better about it if I was confident that the best outcome had been secured as a result of the province acting on a solid recommendation that protects the public health in the Swan River Valley, made by the CEC, in 2009.