

1 Comparison of policy alternatives to reduce GHGs from potential 2 Canadian LNG facilities



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11 12 13 **Abstract**

14
15 Canadian exports of liquified natural gas (LNG) for the purpose of converting coal-fired power
16 generation to natural gas can reduce global greenhouse gas (GHG) emissions. However,
17 emissions from export facilities might increase domestic emissions. As a result, LNG projects
18 have mixed support in Canada. Many business leaders, policymakers, and First Nations leaders
19 have discussed the idea of using carbon capture and storage (CCS) to reduce domestic emissions
20 from LNG exports. The largest barriers to the uptake of CCS are the high costs and limited
21 technical expertise. Government policies to encourage the uptake of CCS might help reduce
22 costs and increase its utilization to significantly reduce domestic and global GHG emissions. In
23 this study, we provide analysis of policies to reduce GHG emissions from LNG projects in
24 Canada using case studies from the United States, Australia, and Canada. Grant support,
25 regulatory requirements, research & development (R&D) funding, and carbon pricing/credits
26 were vital policies for adopting CCS to reduce GHG emissions. These policies can all be
27 effective to encourage CCS in Canadian LNG projects, with each policy having different costs
28 and benefits for government and industry.

29

30 **Introduction**

31
32 Energy consumption is growing rapidly in developing and developed nations. Growth in energy
33 consumption is the major cause of increasing GHG emissions that have accelerated the effects of
34 climate change (IEA 2019a). The high demand for energy consumption is primarily met through
35 the combustion of coal. Coal is a common energy source in developing nations due to its low
36 cost, ease of use and storage. However, it is among the most carbon-intensive forms of energy,
37 producing 30% more emissions than other sources (IEA, 2019a). If energy consumption is going
38 to continue to rise without increasing GHG emissions, coal must be displaced with lower carbon-
39 emitting forms of energy. Natural gas, which is considered a cleaner and low-carbon emitting
40 source, could be used to displace coal-fired electricity generation to significantly reduce global
41 emissions.

42
43 Natural gas could be the fuel that will bridge the gap in the transition toward a low-carbon future
44 in the near term and a zero-carbon future in the long term due to its lower emissions (IPCC,
45 2014). Natural gas demand is forecasted to grow 2.5% per year over the next decade, mainly in
46 the form of LNG, ranking it second in the global energy mix by the year 2040 (McGrory &
47 Collier, 2019). Demand for natural gas is highest in Asian countries such as China, India, Japan,
48 and South Korea due to the high number of manufacturing industries as well as new policy
49 changes to phase out coal plants.

50
51 Proponents of Canadian LNG argue that Canada’s most significant contribution to combating
52 climate change in the near-term would be to export LNG for the purpose of coal-to-gas
53 conversion in the aforementioned countries. While this may be true, Canada will not necessarily
54 get credit for reducing emissions with exports of LNG under the Paris Agreement (United
55 Nations, 2015). The emissions accounting system used by the United Nations Framework
56 Convention on Climate Change counts emissions using a territory-based system, meaning that
57 emissions are counted in the geographical region they are emitted (Dion, 2019). Therefore,
58 unless the rules are altered to provide special considerations for LNG exporting countries,
59 Canada cannot get credit for emission savings in other countries with LNG imported from
60 Canada.

61 Policymakers and LNG proponents must focus instead on reducing domestic emissions
62 associated with LNG projects to receive credit for emissions reductions under the Paris
63 Agreement. Developing projects to capture emissions from LNG facilities like CCS technologies
64 could be an effective solution to reducing domestic emissions for large-scale energy projects. In
65 CCS technologies, carbon dioxide (CO₂) is usually captured from fuel combustion or industrial
66 processes, transported via ship or pipeline, and either used as a commodity in other industries or
67 stored in underground geological formations (IEA, 2019b). According to IEA (2019b), CCS
68 projects are essential options for reducing GHG emissions. However, the high cost of
69 implementation and limited technical expertise have usually prevented widespread adoption of
70 the CCS technology. Adapting or creating policies to make CCS projects economically viable
71 and providing proof of concept to LNG proponents might encourage its implementation in LNG
72 facilities in Canada.

73

74 In this study, we aim to address the question of what policies Canada could adopt to develop
75 cost-effective LNG facilities while maintaining low GHG emissions. We do so, by analyzing and
76 comparing policies aimed at encouraging uptake of CCS as an emissions reduction strategy for
77 LNG facilities in Canada to make it more competitive compared to other LNG exporters such as
78 Australia and the United States. We will begin by providing background knowledge on the state
79 of LNG in Canada. Then, we will provide a summary of the existing policy system influencing
80 GHG emissions in Canada, using British Columbia (BC) as a case study. Next, we will provide
81 three case studies in policy-driven CCS adoption in different projects from the United States,
82 Australia, and Canada. Next, we will analyze the effectiveness of four policies (regulatory
83 requirements, grant supports, carbon pricing/credits, and Research & Development (R&D)
84 funding) that enabled CCS utilization in each of the three cases. Lastly, we will discuss the
85 potential costs and benefits of each policy in the Canadian context, including Indigenous
86 perspectives.

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88 **Background: LNG in Canada**

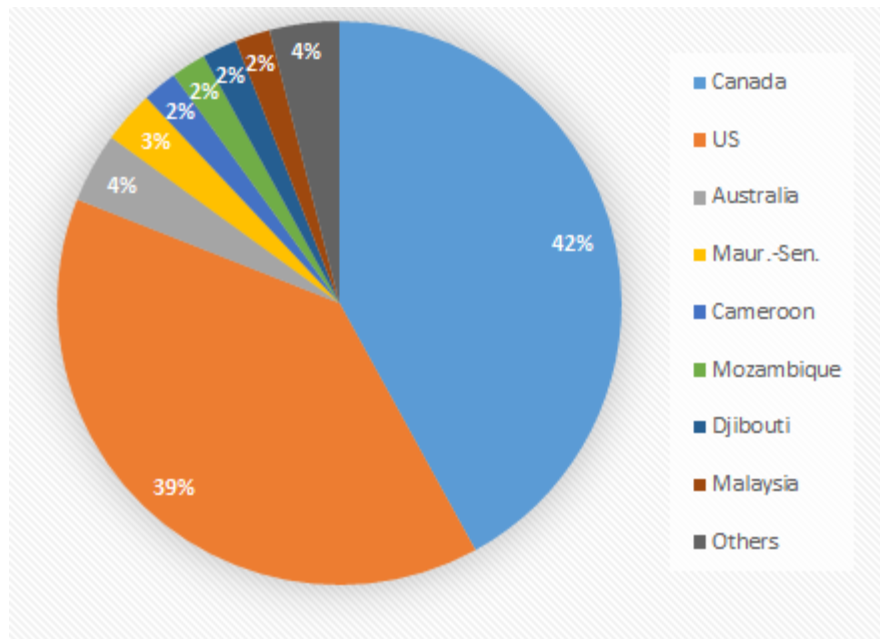
89 Canadian LNG might play an important role in supplying natural gas to meet the high global
90 energy demand and in reducing global GHG emissions. In Canada, there are eighteen proposed
91 LNG export facilities (Table 1), thirteen of them which are located in the province of British

92 Columbia, and five on the east coast of Canada. Although most of the projects have a license to
93 export natural gas, there is only one project in construction (LNG Canada). LNG Canada is the
94 largest project in Canada, which is expected to export 26 million tonnes of natural gas per annum
95 (Mtpa) (NRC, 2018).

96 The main exporters of LNG, based on current and proposed projects will be Canada, Australia,
97 and the United States (Figure 1) (IGU, 2019). Canadian exporters could produce LNG at a
98 similar or lower cost than other exporters of LNG, especially the United States, with lower
99 associated emissions (CERI 2018; Kasumu et al., 2018). Canadian projects are expected to
100 produce fewer associated emissions because the electricity supply used in the liquefaction
101 process will be primarily from renewable sources like hydroelectricity. Furthermore, Canadian
102 LNG facilities are committed to using energy-efficient technologies in the liquefaction process,
103 which is a highly energy-consuming process, to reduce their GHG emissions (Laciak et al.,
104 2019).

105 Table 1. Proposed LNG projects in Western and Eastern Canada. (Modified from NRC, 2018).

LNG Projects	Export-Million Tons per Annum (Mtpa)	Location	Indigenous Communities	Current Status
West Coast Export Facilities				
Kitimat LNG	10	Bish Cove, near Kitimat, British Columbia (BC)	Haisla Nation	Waiting for a Final Investment Decision (FID). Chevron announced its decision to sell 50% of the project at the end of 2019.
LNG Canada	26	Kitimat, BC	Haisla Nation	In construction (started in 2019). First exports are expected to be by 2025
Cedar LNG	6.4	Kitimat, BC	Indigenous-owned project (Haisla Nation)	Working on Environmental Assessment approvals
Orca LNG	24	Prince Rupert Area, BC		Export license approved in 2015.
New Times Energy	12	Prince Rupert Area (barge), BC		
Kitsault Energy	20	Kitsault		Export license approved in 2015.
Stewart LNG	30	Stewart		Export license granted in 2016.
Triton LNG	2.3	Kitimat or Prince Rupert barge facility		On Hold
Woodfibre LNG	2.1	Squamish, BC	Squamish communities	FID expected in 2020
WesPac LNG Marine Terminal	3			
Discovery LNG	20	North of Campbell River		Environmental Assessment and impact studies still to be carried out
Steelhead LNG: Kwispaa LNG	30	Barkley Sound, near Bamfield, BC	Huu-ay-aht First Nations are jointly developing the project with steelhead	It has an approved export license
Watson Island				
East Coast Export Facilities				
Goldboro LNG	10	Guysborough County, Nova Scotia	Mi'kmaq communities	Expected to initiate exports by 2023
Bear Head LNG	12	Nova Scotia		It has an approved export license
A C LNG	15	Byers Cove, Nova Scotia		Commercial operation expected by 2023
Energy Saguenay	11	Saguenay Port Authority	Innus First Nations	Approved export license
Stolt LNGaz	0.5	Bécancour Industrial Park		Environmental Assessment and impact studies still to be carried out



106

107 Figure 1: Under construction and total proposed LNG projects by countries as of February 2019.
 108 Projects with one or less than one percent of the total are included in others. Adapted from IGU
 109 World LNG report 2019, Data Source: IHS Markit.

110 Additionally, Canada has an advantage over other LNG exporters in its geographic location.
 111 Operating costs could be 8-12% lower than the United States due to fewer nautical miles to
 112 Asian markets, and a colder climate that results in higher efficiency in the liquefaction process
 113 (Grafton and Lambie, 2014). Canadian LNG projects are also unique in that many LNG
 114 companies have developed strong partnerships with Indigenous communities, which is essential
 115 for moving towards reconciliation between First Nations, industry, and the government. Despite
 116 being less carbon-intensive, more socially conscious, and more economical than other LNG
 117 export facilities, LNG Canada is still expected to produce roughly 8.6 megatonnes of carbon
 118 dioxide equivalent (Mt CO₂ e¹) emissions per year (Heerema and Kniewasser, 2017). This will
 119 be a significant increase in GHG emissions, which is equivalent to 1.2% of Canada's total
 120 emissions or 13.8% of British Columbia's in 2017 (ECCC, 2020).

121

¹ CO₂e a measure used to compare the emissions from various greenhouse gases based upon their global warming potential. OECD, 2013.

122 **Existing Policy System in British Columbia**

123 Natural resources in Canada are under the jurisdiction of provincial governments, as such, LNG
124 exports off the west coast of Canada are governed primarily by the province of British Columbia.
125 The Greenhouse Gas Industrial Reporting and Control Act (GGIRCA) is the current legislative
126 system regulating emissions for LNG facilities in British Columbia (SBC, 2014). The Act
127 contains three regulations that establish requirements for emissions reporting including the
128 Greenhouse Gas Emission Reporting Regulation, the administrative penalties (Greenhouse Gas
129 Emission Administrative Penalties and Appeals Regulation), and the control of emissions
130 (Greenhouse Gas Emission Control Regulation). Under GGIRCA, LNG facilities pay \$30/tonne
131 of emitted CO₂ , which incentivizes exporters of LNG to reduce their emissions.

132 Despite this, LNG facilities in BC will still produce large amounts of CO₂ e emissions and likely
133 prevent the province from meeting its GHG reduction goals. The province has set the target to
134 reduce 40% of GHG emissions by 2030 and 80% by 2050 below 2007 levels under the Climate
135 Change Accountability Act (CCAA) (SBC, 2007). If the LNG industry develops in the west
136 coast of Canada without more aggressive policies to encourage significant emissions reduction
137 through CCS uptake, these goals will become even further out of reach.

138 Policies to incentivize CCS could assist the province in developing a strong LNG export industry
139 and reduce GHG emissions. The Gorgon LNG facility in Australia, the Petra Nova CCS project
140 in the United States, and the Weyburn/Boundary Dam project in Saskatchewan provide examples
141 of policy options that were used to incentivize CCS in large scale energy projects. These case
142 studies will be used to analyze the effectiveness of different policy options and their applicability
143 for reducing GHGs in Canada's LNG industry.

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146 **Case Studies in Reducing GHG Emissions with CCS**

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149 1. Gorgon LNG – Australia

150

151 The Gorgon CO₂ injection project is the world's largest commercial-scale carbon dioxide (CO₂)
152 sequestration facility. Gorgon LNG is a joint venture of oil majors including Chevron Australia,
153 ExxonMobil, Shell, Tokyo Gas, and a few other smaller corporations. The LNG plant has an

154 annual production capacity of 15.6 million tonnes of LNG. The estimated cost of adding CCS
155 into the Gorgon LNG project was approximately AU\$2 billion (Chevron, 2019).

156
157 Policymakers in Australia utilized a combination of regulatory requirements and grant support to
158 encourage uptake of CCS at the Gorgon LNG facility. Incorporating CCS to capture fugitive
159 emissions was part of the regulatory requirements from the Australian regulators to approve this
160 LNG project (Zapantis et al., 2019). The Australian government, in the form of grant
161 support, committed AU\$60 million to the CO₂ Injection Project through the Low Emissions
162 Technology Demonstration Fund (LETDF) (MIT, 2016). The purpose of the grant is to make an
163 investment in CCS and similar projects attractive to the private sector investors, reducing the
164 cost of project financing and building confidence in the use of the technology (i.e. CCS).
165 According to MIT (2016), the success of CCS at the Gorgon facility was a combination of two
166 main factors, strong government regulations with government support through grant funding.

167
168 Over the lifespan of the Gorgon LNG project, about 40 years starting 2016, the CCS plant is
169 expected to sequester 120 million tonnes of CO₂, or roughly 4 million tonnes per year (Chevron,
170 2019). The estimated reduction of GHG emissions directly associated with the CCS project is
171 about 40 percent. As a result, coupled with the LNG plant energy-efficient design, Gorgon LNG
172 project is expected to have the lowest GHG emissions intensity in Australia (Chevron, 2019).
173 Likewise, it serves as an early reward for investments that can lead to the creation of knowledge
174 useful for future energy-related projects.

175
176 2. Petra Nova - United States

177
178 The Petra Nova project was the first industrial-scale CCS facility in the United States, which
179 began operations in 2017. Petra Nova is a coal-fired power plant in Texas, with 240 MW of
180 generating capacity. Petra Nova is a small part of the multi-unit W.A Parish power plant with a
181 total capacity of 3.6 gigawatts. The CCS facility extracts 5,000 tonnes of CO₂e per day, and
182 between 1.4-1.6 million tonnes of CO₂e per year with 90% efficiency. The CCS unit on Petra
183 Nova reduces the total emissions from W.A Parish by 11% (Folger, 2018).

184

185 The main policies implemented by the US Department of Energy (DOE) to encourage the uptake
186 of CCS in the Petra Nova coal facility included carbon credits, grant support, and R&D funding.
187 The DOE provided US\$160 million (19% of total project cost) in grant support for the
188 construction of the facility and US\$30 million in R&D funding. According to the DOE, the
189 purpose of the project was to provide evidence that CCS technologies can be done economically
190 at scale, especially when there are nearby oil fields available for enhanced oil recovery (EOR)
191 (NETL, 2018). Additionally, the US government provides a tax credit for sequestered carbon that
192 pays out \$50 per tonne of sequestered CO₂. The tax credit is viewed by CCS proponents as a
193 significant step in incentivizing large-scale CCS and improving its economic viability.

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196 3. Boundary Dam/Weyburn – Canada

197

198 The Boundary Dam CCS project is a large-scale demonstration project by SaskPower to capture
199 and store up to 1 million tonnes of CO₂ per year. CO₂ is sourced from the coal-fired electric
200 power station in Estevan, Southeastern Saskatchewan. The Boundary Dam CCS plant supplies
201 CO₂ via a 66 km pipeline to the Weyburn and Midale oil field for commercial EOR operation.
202 Thus, the captured CO₂ becomes a commodity and generates revenue that helps to offset capture
203 costs.

204

205 Boundary Dam provides evidence of the effectiveness of CCS as an emissions reduction tool in
206 the Canadian energy sector. The CCS project is capable of a 90% emission reduction from the
207 post-combustion CO₂ generated from the power plant. This results in 10 times less emission
208 compared to a typical coal-fired power plant without CCS. Capturing of CO₂ began in 2014 and
209 within 5 years of operation, it has captured 2.5 million tonnes of CO₂, which is equivalent to
210 taking over 600 thousand cars off the road in terms of emission (SaskPower, 2019). Weyburn
211 field has a potential of storing 20 million tons of CO₂ and the estimated cost of storage is less
212 than \$20/tonne of CO₂ (Preston et al., 2005), this shows the economic feasibility of pursuing
213 CCS to mitigate GHG emissions.

214

215 The Canadian and Saskatchewan governments used grant support, R&D funding, and carbon
216 taxes to incentivize CCS uptake at Boundary Dam. The project was a CA\$1.35 billion

217 government-industry partnership, where the federal government provided CA\$240 million of
218 funding support to foster R&D in CCS. Additionally, the project is subject to the federal carbon
219 pricing system, under which the Boundary Dam facility would avoid paying CA\$30/tonne for the
220 CO₂ it captures and stores.

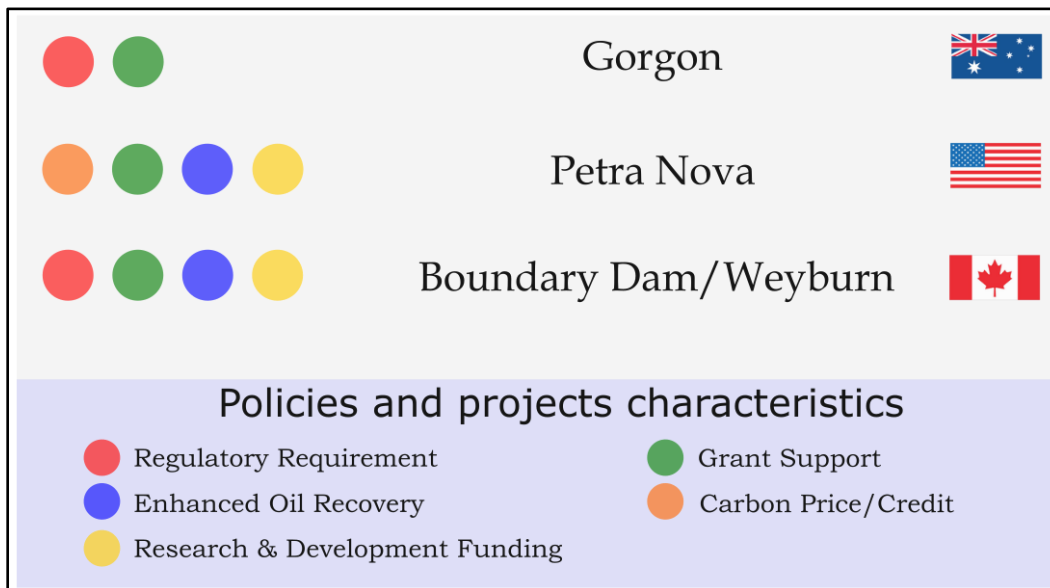
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223 Analysis and Comparison of Policy Options

224

225 In this section, we analyze and compare the policies utilized by the Australian, Canadian, and
226 United States governments to encourage CCS technologies in large scale energy projects. Four
227 primary policy options were pursued by the three governments: 1. regulatory requirements, 2.
228 grant support, 3. carbon pricing/credits, and 4. research and development (Figure 2).

229



230

231 Figure 2: Policies and project characteristics of three CCS case studies in Australia, the United
232 States, and Canada. Adapted from Zapantis et al., 2019.

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234

235

236 1. Regulatory Requirements

237

238 Regulatory requirements were utilized at the Gorgon LNG facility in Australia and Boundary
239 Dam in Canada. Regulatory requirements, like mandating CCS in LNG plants, can be an
240 effective measure for ensuring compliance from industries to reduce GHG emissions. However,
241 CCS may not be favored by investors due to the additional cost of implementation. Therefore,

242 CCS projects could raise costs for exporters of LNG, which might prevent some facilities from
243 being economically viable. It may be more effective to couple regulatory requirements with other
244 cost-reducing policies to ensure that LNG projects are still profitable, in addition to having lower
245 GHG emissions.

246 247 2. Grant Support

248
249 Grant support was the most common policy in the three case studies. All three governments
250 utilized some form of direct grant support to encourage GHG reducing technologies (Figure 2).
251 While the degree of funding given by the levels of government differed, all governments
252 provided direct funding to the industry to help reduce the upfront cost of installing CCS. Grant
253 support as a policy strategy has the advantage of directly lowering costs for industry, which is
254 often cited as the largest barrier to the widespread adoption of CCS as an emissions reduction
255 strategy (Abdulbaqi et al., 2018). Therefore, grant support could be an effective policy solution
256 for providing evidence that CCS can be implemented economically in LNG facilities. However,
257 it may not be the most effective policy solution in the long term. If the government of Canada or
258 the government of British Columbia were to provide grant support at the same level of funding
259 as Petra Nova (19% of project cost) for CCS on all LNG facilities, they would be handing out
260 billions to industry. Therefore, grant support may be more effective to provide proof of concept
261 to industry, after which grant support should not be pursued as a viable long-term policy
262 strategy.

263 264 265 3. Carbon Pricing/Credits

266
267 Carbon pricing or tax credits were available to industry in both the Petra Nova and Boundary
268 Dam/Weyburn case study. Placing a price on carbon emissions provides an incentive for large-
269 scale energy facilities to internalize the social costs of polluting; similarly, placing an incentive
270 to reduce emissions through carbon capture with tax credits and carbon credits encourages the
271 uptake of CCS (Zhang et al., 2020). In Boundary Dam, carbon pricing encouraged the adoption
272 of CCS to reduce CO₂e emissions. In Petra Nova, the federal tax credit for sequestered CO₂ was
273 a critical component of the economic viability of the project (Folger, 2018). The OECD (2003)
274 report noted that for a carbon price to be effective in reducing GHG emissions and maintaining

275 incentives to the industry, the rates should be set as high as possible but with some adaptations
276 that allow companies to stay competitive. The IEA (2019b) suggested that although a tax and
277 carbon price are measures that could secure long-term investments, it might be necessary to
278 include additional policies to secure CCS project funding.

279
280

281 4. Research and Development Funding

282
283 Petra Nova and Boundary Dam both received R&D funding. R&D funding played a critical role
284 in reducing the cost of CCS at Petra Nova. Government investment through R&D aimed at
285 lowering the cost of CCS technology can be an effective policy for encouraging CCS in the
286 energy sector. On the other hand, private investment in CCS related R&D is limited because of
287 the unequal distribution of costs and benefits. A private company that invests in R&D bears all
288 the cost of making CCS less expensive. However, they do not receive all the benefits as the
289 technology becomes less expensive for competitors. The unequal distribution of gains and losses
290 inhibits private investment in R&D; and therefore, carves out a role for public investment.
291 Government investment in R&D ensures that all companies benefit equally from lower CCS
292 costs.

293

294 **Discussion**

295

296 Canada's LNG industry must demonstrate high environmental and social commitments as well
297 as relatively low economic costs to be competitive in the global LNG market. Establishing
298 policies to reduce GHG emissions without significantly increasing costs could help develop the
299 LNG industry in Canada. The three case studies of CCS projects provide evidence of the
300 effectiveness of four policy alternatives to reduce GHG emissions in the energy sector. These
301 policies could be implemented in the LNG industry in Canada to achieve similar results. On the
302 global stage, Canada is already among the leading countries in terms of GHG emission reduction
303 through CCS technologies and could further improve its emissions reductions in the natural gas
304 sector. LNG operators will likely commit to projects that guarantee profitability in a short period
305 and projects that have a clear set of rules from the government side. Support from the provincial
306 and federal governments will be vital to reduce costs and encourage stakeholders to invest in the
307 development of LNG projects.

308

309 LNG projects provide the opportunity to create partnerships between Indigenous communities,
310 the LNG industry, and the government that could bring economic development. Indigenous
311 communities can benefit from job creation opportunities as well as from social benefits that
312 might include road and facilities construction. Canadian LNG projects can be used to advance
313 the reconciliation path between government and Indigenous communities. Additionally, remote
314 Indigenous communities that are heavily dependent on diesel can be encouraged to transition to a
315 cheaper and cleaner LNG fuel.

316
317 Policy formulation and implementation must consider the impacts on both the environment and
318 industry. Regulators should control the price of achieving interim emission goals and avoid
319 driving carbon-intensive industries out of business or increasing prices to consumers. Policy
320 analysis implies that using only one policy is not the best solution to reduce emissions and may
321 have negative impacts on the energy industry or the government. For example, regulatory
322 requirements are not as effective as a standalone policy because they significantly raise costs to
323 the LNG industry. However, regulatory requirements can be effective when combined with other
324 policies, like grant support, to lower the costs of CCS technologies for GHG emission reduction.
325 Adopting a suite of policies and regulations could be more effective than individual policies in
326 the long term.

327
328

329 **Conclusion**

330
331 LNG exports present an economic growth opportunity for Canada with a potential contribution
332 to global GHG emissions reduction. However, emissions from LNG facilities must be mitigated
333 with appropriate sets of technologies and policies. Policy incentivizing uptake of CCS in western
334 Canadian LNG facilities could encourage the growth of the industry without leading to
335 significant increases in emissions. The existing policy system utilizes a carbon price that has
336 proved insufficient for encouraging the widespread adoption of CCS. The uptake of CCS may be
337 better encouraged by utilizing a mix of regulatory requirements, grant support, carbon
338 pricing/credits, and funding for research and development. These policies have varying costs and
339 benefits but have all proven effective in encouraging the adoption of CCS in the three large scale
340 energy projects analyzed in this study. The adoption of this suite of policies could assist

341 Canadian governments in developing a successful LNG industry that does not prevent them from
342 meeting their emissions reduction objectives.

343

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345

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