



Carmeuse Americas

11 Stanwix Street, 21st Floor • Pittsburgh, PA 15222

Phone: 412.995.5500 • Fax: 412.995.5570

info@carmeuse.com

January 9, 2023

Jennifer Keyes
Director, Resources Planning and Development Policy Branch
Ministry of Natural Resources and Forestry
300 Water Street, 2nd Floor, South Tower
Peterborough, ON
K9J 8M5

RE: ERO# 019-6296 Comments on proposed amendments to the Oil, Gas and Salt Resources Act, to remove the prohibition on carbon sequestration

Dear Ms. Keyes:

Carmeuse Lime (Canada) Limited (“Carmeuse”) is the sole commercial manufacturer of lime in the Province of Ontario with facilities located in Ingersoll, Dundas and Blind River. Carmeuse is a critical supplier to many of Ontario’s largest industries, including steel and mining. Lime is also a critical material used for water treatment, environmental pollution control and many more.

Carmeuse is committed to contributing to a carbon-neutral Ontario and has established a corporate goal of company-wide carbon neutrality by 2050. However, the lime industry has consistently been identified as a highly energy intensive, trade exposed industry. The manufacture of lime is energy intensive in that it both requires large quantities of heat to convert limestone to lime and produces process emissions. Competition to the lime industry in Ontario exists both in the United States as well as other provinces in Canada.

As a hard-to-abate industry, carbon capture, utilization and storage (CCUS) will play a critical role in both the Province and Carmeuse meeting their carbon reduction goals. Carmeuse strongly supports the Province’s actions here to remove a critical roadblock on moving forward with successful CCUS projects in the Province. However, the Province must recognize that removal of this roadblock is just one of the many actions that Ontario will be required to take to make CCUS a reality in Ontario.

Carmeuse is partnering with others in industry, academia and government to chart a path forward to seeing a carbon neutral reality. We support the comments made by these partners to address the various financial and technical challenges ahead.

In particular, Carmeuse provides the following comments:

1. To meet Provincial and company decarbonization goals, it is critical that the Province move as fast as possible to create a complete regulatory program to allow CCUS projects to proceed.

2. The Province should ensure that the MNRF has sufficient resources to meet these aggressive goals.
3. Ontario should ensure that its program is aligned with available federal incentive programs.
4. The Province should provide some indication on how it intends to proceed to ensure sufficient pore space access to meet anticipated storage needs.
5. The Province should support open access pipelines and other mechanisms to provide the economies of scale necessary for successful CCUS projects.
6. With respect to the Roadmap proposed by the Province, it is critical to properly align the timing for its proposals for demonstration projects and overall project design. Certainty on overall project design will be critical for designing appropriate demonstration projects and should be developed concurrently with legislation or regulatory changes necessary for those demonstration projects. Moving quickly on both sets of proposals is crucial.
7. Demonstration projects should be permitted on Crown Land as well as private land since sufficient pore space will likely require the utilization of both.

Carmeuse appreciates the actions being taking by Ontario to ensure that the Province and its industries remain competitive in a decarbonized world and looks forward to continuing to work with this consortium to make CCUS a viable carbon abatement strategy in the Province.

Sincerely,

Joseph Freudenberg
Environmental Counsel