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US Federal Permitting of the Line 5 Tunnel Project

US Army Corps of Engineers (USACE) Supplemental Draft Environmental Impact Statement
November 13, 2025

Government of Canada Submission

On behalf of the Government of Canada, thank you for the opportunity to provide a submission to the public comment process by the U.S. Army Corps of Engineers (USACE), Detroit District, pursuant to Section 10 of the *Rivers and Harbors Act* of 1899 and Section 404 of the *Clean Water Act*, in compliance with the *National Environmental Policy Act* (NEPA).

This public comment period seeks input on the November 13, 2025, Supplemental Draft Environmental Impact Statement (Supplemental Draft EIS) for the permit application for the Great Lakes Tunnel Project. The comments on the Supplemental Draft EIS herein are additional to the Government of Canada's submission in June 2025 (attached) to the May 2025 Draft Environmental Impact Statement (DEIS).

The Supplemental Draft EIS references the applicant's preferred alternative of the Line 5 Tunnel Project as set out in the DEIS. The Government of Canada reaffirms its support for the Tunnel Project and the DEIS conclusions as to purpose and need, serving two equally important objectives: (1) maintaining the supply of critical energy resources to the U.S. and Canada, and (2) enhancing the protection and safety of the shared waters of the Great Lakes.

Line 5 delivers to the U.S. Upper Midwest and central Canada essential fuels for power and heat, and provides raw materials for many businesses, industry, residents and refineries. The DEIS affirmed strong market demand until at least 2050 and a direct public welfare need for the light crude oil and natural gas liquids (NGLs) currently transported by Line 5. NGLs carried by Line 5 are essential to the production of propane and other petrochemical products. This propane supplies critical energy to rural residents and agriculture in Michigan, northern Minnesota, northern Wisconsin, Ontario, Quebec, certain eastern U.S. states and Canada's Atlantic provinces. In addition to energy supply, Line 5's Tunnel Project will further enhance the protection of the Great Lakes by removing the existing pipeline from the lakebed of the Straits of Mackinac.

Line 5's continued operation will ensure the future transport of crude oil and NGLs to tens of millions of consumers and businesses in the U.S. and Canada, and further improve safety and environmental protection of the waters of the Great Lakes. The Tunnel project represents a proactive, thoughtful initiative to modernize energy infrastructure. The Government of Canada, for all these reasons, strongly supports the Tunnel Project and its timely review and approval.

Sincere regards,

Colin Bird

Consul General of Canada in Detroit

Prior submission follows.

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On behalf of the Government of Canada, thank you for the opportunity to provide our submission to the public comment process by the U.S. Army Corps of Engineers (USACE), Detroit District, seeking input on the Draft Environmental Impact Statement (DEIS) for Enbridge's permit application for the Great Lakes Tunnel Project (file number LRE-2010-00463-56-A19). The DEIS is being filed pursuant to Section 10 of the *Rivers and Harbors Act* of 1899 and Section 404 of the *Clean Water Act*, in compliance with the *National Environmental Policy Act* (NEPA).

The comments herein supplement the Government of Canada's submission to the USACE, Detroit District, in October 2022, in which Canada expressed support for the Tunnel Project. The Government of Canada supports the conclusions made in the DEIS that the project will serve two equally important objectives: (1) maintaining the supply of critical energy resources that will be required until at least 2050; and, (2) enhancing the protection and safety of the shared waters of the Great Lakes.

The current context of global insecurity and conflict has made it clear that energy affordability and security of supply cannot be taken for granted. As a crucial part of energy supply infrastructure, Enbridge Line 5 provides cities and communities on both sides of the border with reliable and essential energy supplies, while stimulating economic prosperity across multiple value chains. The Tunnel Project will further strengthen and modernize this critical infrastructure.

Essential Supply and the Line 5 Network

As noted in the DEIS, the Line 5 pipeline delivers to the Great Lakes region essential fuels for power and heat, and provides raw materials for many businesses, residents and refineries. The DEIS states that there is strong market demand and a direct public welfare need for the light crude oil and natural gas liquids (NGLs) currently transported by Line 5.

Refineries in the U.S. depend on crude oil delivered by Line 5. For example, Marathon's Detroit Refinery receives 28% of its feedstock directly from Line 5 to produce gasoline, diesel and jet fuel that are essential to everyday transportation for countless individuals, families and businesses. In Toledo, Ohio, and in Warren, Pennsylvania, three more petroleum refineries rely on Line 5 for their feedstock and have publicly expressed concerns about the severe impacts to their operations in the event of a Line 5 shutdown, due to their limited storage capacity and insufficient transportation alternatives.

The Sarnia Petrochemical and Refining Complex receives shipments of crude oil from Line 5, ensuring a cost-effective supply of gasoline, diesel, jet fuel and other petrochemical products such as plastics and isopropyl alcohol for hand sanitizers and hospital disinfectants. Refining capacity in Ontario helps to moderate prices for consumers in the Great Lakes region while providing essential feedstock, which in turn supports heating and transportation markets on both sides of the border, as well as broader continental markets.

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Consulat général du Canada

Pipelines remain the safest, most efficient, and most cost-effective means for large-scale transportation of crude oil and NGLs. Along with other pipelines, Line 5 minimizes the use of less reliable, less efficient transportation methods such as rail, marine, and trucking on public roads and waterways. It also generates significantly lower air pollution and avoids the displacement of other essential goods (such as grain) that travel by train, ship, and truck.

Propane and Natural Gas Liquids Supply for the U.S. and Canada

Enbridge Line 5 also carries NGLs that are essential to the production of propane and other petrochemical products, and directly or indirectly supplies propane to Michigan, northern Minnesota, northern Wisconsin, Ontario, Quebec, certain eastern U.S. states, and Canada's Atlantic provinces. NGLs from Line 5 are processed at fractionators in Superior (Wisconsin), Rapid River (Michigan) and Sarnia (Ontario). Each of these facilities lack alternative supply sources. Without access to Line 5, facility operators have been clear that their facilities would be stranded, leaving residents and farmers with costlier and less reliable alternatives to vital fuels.

Line 5 delivers feedstock to produce 65% of the propane consumed in Michigan's Upper Peninsula and 55% of Michigan's statewide propane needs. Over 200 million gallons of propane and butane processed through Line 5 are delivered to Michigan every year and are used to heat homes, support agriculture (crop drying) and run essential businesses. 85% of homes in northern Michigan are heated by propane deliveries that are made possible by Line 5.

In examining propane supply for Michigan, the Upper Peninsula Energy Task Force has indicated that Michigan leads the U.S. in residential propane consumption, and that there are few energy alternatives for heating in this region. It also notes that outside of Line 5 there is a lack of sufficient regional infrastructure to move and store NGLs. Once constructed, the Great Lakes Tunnel Project would enhance the continued operation of the current supply chain that supports the region, providing cost effective and reliable access to propane for the many residential, rural and business consumers in Michigan, Wisconsin, Ontario, Quebec, and other areas. The DEIS states that the current need for transport of Line 5's pipeline products is supported by their existing use, and that this demand will continue for the foreseeable future.

If Line 5's operations were halted, regional propane production would have no immediately available feedstock. It would be subject to longer and more vulnerable alternative supply chains, including reliance on rail shipments from more distant production locations. The rail system is most vulnerable to disruptions in the winter months, coinciding with peak demand for propane in the Great Lakes region.

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Past declared energy emergencies underline the critical role of existing energy infrastructure, including Line 5. For example, as recently as April 2025, Michigan's Governor signed executive orders declaring energy emergencies to allow for the efficient delivery of residential heating fuel, including propane, after fuel terminals in the state reported limited supplies. Similarly, in January 2025, the Governor of Wisconsin issued an executive order declaring a state of energy emergency after heating fuel supply disruptions. Each of these emergency response measures was activated due to constraints in the fuel supply and distribution system during the colder months. Without Line 5, such energy emergencies would immediately become significantly more severe and much harder to mitigate.

Integrated Energy Infrastructure and Trade

The U.S. and Canada have a strong history of building things together. Our integrated manufacturing supply chains and energy infrastructure across the entire border allows for the efficient production and transportation of essential goods and services upon which each country relies.

The integrated Canada-U.S. energy system supported over US\$151.3 billion in two-way energy trade in 2024 (U.S. Census Bureau). According to the U.S. Energy Information Administration, in 2024, Canada supplied to the U.S. over 4 million barrels per day of crude oil. This represented more than 60% of the U.S.'s daily crude oil imports or roughly 25% of daily crude oil intake at U.S. refineries. Line 5 is an integral component of this bilateral energy system, ensuring energy supply to the U.S. Midwest and central Canada.

Hundreds of thousands of jobs, and economic growth and investment, are linked to the Canada-U.S. energy relationship. Transportation and energy infrastructure between Canada and the U.S. enables one of the largest and most profitable trade relationships in the world.

Environmental Considerations and Joint Stewardship of the Great Lakes

Canada and the U.S. have a long history of working collaboratively and investing significant resources in protecting and restoring the Great Lakes. With nearly one-third of U.S. and Canadian economic activity centred in the Great Lakes and St. Lawrence region, a significant number of binational mechanisms at the federal, state, provincial and municipal levels work together to further environmental protection and economic development in this area. A clean and responsibly managed Great Lakes watershed system is crucial for the economies of both countries.

Canada's 2020 and 2022 submissions highlighted, as evidence of our ongoing commitment to the environmental protection of the Great Lakes, the Great Lakes Water Quality Agreement. The Agreement, originally signed in 1972 and most recently amended in 2012, is an important framework for ensuring binational consultation and cooperation action to restore, protect and enhance the water quality and ecological health of the Great Lakes. Our submissions also highlighted the 2017 Great Lakes Protection Initiative, renewed as the Freshwater Action Plan in 2023. This plan targets key areas of

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binational importance, such as preventing toxic and nuisance algae, reducing harmful chemicals, and improving the health of coastal wetlands.

In the same vein, the Government of Canada supports the Great Lakes Tunnel Project as an additional means to further enhance the protection of the Great Lakes. This protection is affirmed by the DEIS's acknowledgment that the Tunnel will eliminate the risk of a vessel anchor strike on the existing Line 5 dual pipelines in the Straits, reduce the need for in-water maintenance activities, and enable secondary containments, thereby further preventing possible water-based contamination.

Indigenous Engagement and Participation in Canada

Canada is committed to renewing its relationship with Indigenous Peoples based on the recognition of rights, respect, cooperation and partnership. Canada's federal and provincial governments also support Indigenous direct equity stakes in projects and revenue sharing. The energy industry employs thousands of Indigenous people directly, providing major economic benefits to their communities. For the Line 5 Tunnel Project, Enbridge has committed to Indigenous economic inclusion and participation in alignment with the company's Indigenous Policy. This includes a commitment that at least 10% of the project staff hours worked would consist of Indigenous (Tribal) people.

Conclusion

By housing the pipeline in a tunnel under the lakebed at the Straits of Mackinac, the Tunnel Project reviewed by the DEIS represents a proactive, modernized and thoughtful initiative to further improve safety and environmental protection, and ensure the continued transport of crude oil and NGLs to tens of millions of consumers and businesses in the U.S. and Canada. It is for these reasons that Canada strongly supports the Tunnel Project, and its timely review and approval.

Sincere regards,

A handwritten signature in blue ink that reads "Colin Bird".

Colin Bird
Consul General of Canada in Detroit