05/18/16

From:
Louisette Lanteigne
700 Star Flower Ave.
Waterloo Ont.
N2V 2L2

Email: water.lulu@rogers.com
Phone: 226-972-7429

I _____ of the City of _____ in Waterloo Region in the Province of Ontario make oath and say:

1. I am filing a formal complaint against Imperial Oil for climate change denial, lack of fiscal prudence and non disclosue of risks.

2. I am a concerned Canadian citizen and Metis woman living in Waterloo Ontario.

3. As an Indigenous woman, it is in the custom of my people to assure the protection and well being of life for generations to come. It is my duty and obligation to do this by way of the Vatican Concordat of 1610 which recognized the Mi'kmaq Nation as the first Catholic Nation in North America and facilitated trade between my ancestors and Europe. The Vatican has a legal duty to protect us in exchange for our duty to protect fellow Christians and this law is recognized by way of a Wampum agreement which predates the Canadian Constitution by over 250 years. See **Attachment 1**.

4. **Attachment 2** is a report I read produced by Imperial Oil titled Review of Environmental Protection Activities for 1978-1979.

5. On **Page 2 of Attachment 2** of the PDF report, it shows the report was signed off by H.H. Clare, Environmental Protection Coordinator and is dated 1980-08-06. I observed a distribution list on page 2 of the PDF report indicates it was disseminated to managers across Exxon's International Corporate offices including Europe

10Lpub-6-119 DR MacDonald

ESSO

IMPERIAL OIL LIMITED

111 St. Clair Avenue West, Toronto, Canada M5W 1K3

H. H. CLARE
ENVIRONMENTAL PROTECTION COORDINATOR

1980-08-06

File No. 801

Environmental Quality Committee Members
Toxic Substances Subcommittee of EQC Members
Corporate Managers
Marketing Region Managers
Refinery Managers
Region Environmental Advisors
Mr. R. G. Ernst - Esso Eastern Inc., Houston
Mr. L. B. Shore - Esso Europe Inc., London
Mr. H. B. Prall - Esso Inter-America Inc., Coral Gables
Mr. R. J. Campion - Exxon Company, U.S.A., Houston
Mr. A. M. Natkin - Exxon Corporation, New York
Dr. V. A. Newill - Exxon Corporation, East Millstone
Dr. H. R. Gould - Exxon Production Research Co., Houston
Dr. J. A. Price - Exxon Research and Engineering Co., Linden
Dr. M. B. Glaser - Exxon Research and Engineering Co., F. P.

Gentlemen:

I have attached for your information a copy of the Review of Environmental Protection Activities for 1978-1979 of Imperial Oil Limited.

Yours very truly,

H. H. Clare

HHC/js
Att.

(Copies of attachment
sent to Management Committee
and CAC by CAC Exec. Secy.)

6. **Attachment 2, page 5 and 6** of the PDF report, confirms Imperial Oil was aware of issues specific to C02 as it relates to the burning of fossil fuels. It states:

B. Summary of Major Topic Issues

(i) Climatic Change, Carbon Cycle

The global biogeochemical carbon cycle is a very complex system. It is assumed that the major contributors of CO_2 are the burning of fossil fuels which has been level at 4.5×10^{15} grams per year and oxidation of carbon stored in trees and soil humus. The major sinks are the atmosphere and the oceans. The atmosphere in 1978 contained 695×10^{15} grams.

Chart 2

Removal of CO_2 is achieved by photosynthesis and each year it is estimated that forests take up 20×10^{15} grams of carbon. Since a forest removes several times the quantity of CO_2 removed by crops per unit of area, a major concern exists with respect to deforestation.

[redacted]

2

There is no doubt that increases in fossil fuel usage and decreases in forest cover are aggravating the potential problem of increased CO_2 in the atmosphere. Technology exists to remove CO_2 from stack gases but removal of only 50% of the CO_2 would double the cost of power generation.

UNEP has encourage several international bodies to intensify study of the carbon cycle.

UNEP has encourage several international bodies to intensify study of the carbon cycle.

7. **Attachment 2 page 31**of the PDF report, identifies issues of C02 as a major topic issue in Chart 2.

Chart 2

STATE OF ENVIRONMENT 1980
MAJOR TOPIC ISSUES REPORTED

1. CLIMATIC CHANGES, DEFORESTATION, CO_2 AND THE CARBON CYCLE
   - CO_2 IN THE ATMOSPHERE
   - 1850-280 PPM 1978-330 PPM
2. HEALTH HAZARD FROM HEAVY METALS
   PROBLEMS KNOW FROM:
   - CADMIUM, LEAD, ARSENIC, MERCURY, NICKEL
3. TRANSPORT AND THE ENVIRONMENT
   PROBLEMS – CONSUMPTION OF ENERGY AND LAND RESOURCES, AIR EMISSIONS, NOISE, ACCIDENTAL DAMAGE

8. **Attachment 3** is an Imperial Oil report that I read titled, Review of Environmental Protection Activities for 1980-1981. On **page 29** of the PDF under Key Environmental Affairs Issues and Concerns it states C02/Greenhouse effect receiving increased media attention.

KEY ENVIRONMENTAL AFFAIRS ISSUES AND CONCERNS

- RELAXATION AT NATIONAL LEVEL WILL MEAN MORE ACTIVITY AT LOCAL LEVELS.
- USE OF ENVIRONMENTAL IMPACT ASSESSMENT GROWING.
- OIL SPILL RESPONSE CAPABILITY MUST BE MAINTAINED.
  -- INTERNATIONAL OIL SPILL ORGANIZATION
  -- OIL SPILL CHEMICALS
- ACID RAIN HAS NOW EMERGED AS AN ISSUE IN NORTH AMERICA.
- CO_2/GREENHOUSE EFFECT RECEIVING INCREASED MEDIA ATTENTION.
- INCREASED EMPHASIS ON TOXIC SUBSTANCES/ENVIRONMENTAL HEALTH.

9. **Attachment 4** is a report I read titled Pollution is Everybody's Business by H. R. HOLLAND Engineering Division Logistics Department Sarnia , Ontario January 30, 1970.

10. **Attachment 5** identifies Mr. Holland's work experience as follows:

ENVIRONMENTAL RESTRAINTS ON PRODUCTION PRACTICES

H. R. HOLLAND *Imperial Oil Limited (retired), Sarnia, Canada*

CHAIRMAN (I. G. BRYDEN)

Our third speaker this afternoon is Mr. Hugo Holland. Mr. Holland graduated with a Bachelor of Engineering from McGill in 1933. He joined Imperial Oil and spent 30 years in administrative positions in the Refining Department of that company. He was subsequently transferred to Sarnia, and until his retirement in 1973, was responsible for environmental protection. He is presently a member of the Chemical Institute of Canada, the Engineering Institute of Canada, and the Research Advisory Board of the International Joint Commission. Mr. Holland is the author of several papers on Refining, Industrial Waste, Pollution and the Environment, and I ask you to join me in welcoming him at this time.

11. In **Attachment 4, page 3** of the report, it states the following:

Since pollution means disaster to the affected species, the only satisfactory course of action is to prevent it -- to maintain the addition of foreign matter at such levels that it can be diluted, assimilated or destroyed by natural processes -- to protect man's environment from man.

12. In **Attachment 4 page 4, table 1** of the report, it identifies C02 as an air pollutant and reveals the assocated emissions by way of oxidation of plant and animal matter and combustion.

Table 1

ESTIMATED GLOBAL EMISSIONS OF SOME AIR POLLUTANTS

COMPOUND	SOURCE	EMISSION T/YR.
*SO_2	Combustion - coal	51 x 10^6 as S
	" - petroleum products	11 "
	Refining Petroleum	3 "
	Smelting	8 "
*H_2S	Industrial Sources	3 "
	Marine "	30 "
	Terrestrial "	70 "
*SO_4	Marine "	130 "
Total S Compounds	All Sources	306 "
	Natural "	230 "
*NO_2	Combustion	16.1 x 10^6 as N
	Biological Action	150 "
*NH_3	Combustion	3.5 "
	Biological Action	4900 "
*N_2O	Biological Action	410 "
Total N Compounds	All Sources	5480 "
	Natural Sources	5460 "
*CO	Combustion Sources	221 x 10^6 as C
	Incineration	25 "
	Forest Fires	11 "
	Marine - Undetermined but very large	
**CO_2	Oxidation of Plant and Animal Matter	150,000 "
	Combustion	4,500 "
Total C Compounds	All Sources	154,757 "
	Natural Sources	150,000 "

References: * Gaseous Atmospheric Pollutants from Urban and Natural Sources - Robinson & Robbins, APCA 69-155.

** Carbon Dioxide Affects Global Ecology - E.K. Peterson, P. 1162 - Environmental Science and Technology, November, 1969.

13. There is a double asterix adjacent to the term Carbon Dioxide Affects Global Ecology by E.K Peterson produced in 1969. The abstract to that report is **Attachment 6.** In this report that I read, it states the following: *Man's activities are changing the carbon dioxide and oxygen content of the entire atmosphere; these changes may, in turn, affect weather and the growth of plants. Oxygen and carbon dioxide, plus water and nitrogen are the basic building blocks for all life processes, and, therefore, the foundation for man's sustained yield programs-both plant and animal.*

The atmosphere today contains about 21% 0x and about 0,032% C02 by volume, However man's activities—mainly land clearling, the burning of fossil fuels, and making cement from limestone—are artificially reducing the O2 and increasing the C02 content of the air. The burning of fossil fuels is prmarily responsible, but the other two factors should not be ignored.

The long term effects of these changes in atmospheric gases upon world weather and upon man's environment are of vital interest to everyone, since worldwide temperatures may rise or fall in response to the amount of C02.

Eugene K. Peterson
Bureau of Land Management, Portland, Ore. 97208

Carbon dioxide affects global ecology

Continued increases in atmospheric carbon dioxide will change worldwide weather and plant growth

Managers of renewable land resources in most nations of the world recognize the principles of sustained yield—harvesting on an annual or periodic basis only what is replenished during the same period. Sustained yield may be applied to soil nutrients used in growing crops; to forests; to water, both surface and subsurface; to forage for domestic and wild animals; and to fish and wildlife. Natural resource managers are attempting to make long-range plans—for as long as 150 years in the case of forests.

Worldwide, there is growing acceptance of the principles of sustained yield and the desirability of achieving a balance between harvest and growth of the renewable land resources. Weather is a major factor governing these resources. But will weather remain constant, or will it change appreciably by the year 2000 or 2050?

What is the situation concerning the air resources? Are they renewable? There has been worldwide concern over pollution of the atmosphere with radioactive materials, and local concern over pollution of the cities' air with carbon monoxide, hydrocarbons, sulfur compounds, smoke, dust, and many other irritating, malodorous, and poisonous byproducts of combustion. It appears both technically and economically feasible to control these emissions, and we are beginning to move in that direction. In this sense, the quality of our air is renewable.

Other changes in the air, however, cannot be reversed so readily. Man's activities are changing the carbon dioxide and oxygen content of the entire atmosphere; these changes may, in turn, affect weather and the growth of plants. Oxygen and carbon dioxide, plus water and nitrogen, are the basic building blocks for all life processes, and, therefore, the foundation for man's sustained yield programs—both plant and animal.

Both oxygen and carbon dioxide are, of course, colorless, odorless, and nonpoisonous, and neither is a pollutant in the ordinary sense of the word. Through photosynthesis, plants use light energy to convert carbon dioxide and water into carbohydrates and release oxygen into the atmosphere. When plant materials decompose, or burn, or are consumed by animals, the process is reversed. Oxygen is used to convert carbohydrates into energy plus carbon dioxide and water. These are the basic steps in the complex carbon cycle.

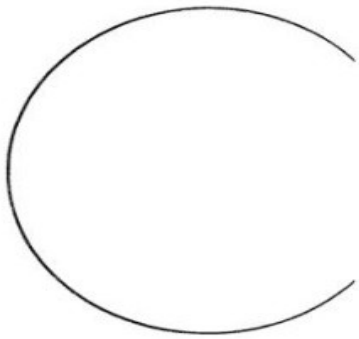
Under normal conditions, the amounts of CO_2 and O_2 in the atmosphere remain approximately in equilibrium on a year-to-year basis. In 1963, Helmut Leith reported that the annual use of carbon in photosynthesis is about 150 billion tons per year, roughly equally divided between land plants and marine plants. This is about one fifth of the amount present in atmospheric CO_2. This is matched by the annual release from oxidation of organic matter.

The atmosphere today contains about 21% O_2 and about 0.032% CO_2 by volume. However, man's activities—mainly land clearing, the burning of fossil fuels, and making cement from limestone—are artificially reducing the O_2 content and increasing the CO_2 content of the air. The burning of fossil fuels is primarily responsible, but the other two factors should not be ignored.

The long-term effects of these changes in atmospheric gases upon world weather and upon man's environment are of vital interest to everyone, since worldwide temperatures may rise or fall in response to the amount of CO_2. Changes that have occurred within the past century are barely discernible. They have attracted little attention. One reason is that the study of such phenomena involves several sciences, whereas our scientific efforts are focused primarily by individual disciplines. Perhaps, changes in the atmosphere and world weather will be obvious to all by the year 2000.

The temperature of the earth has changed—from periods when most of the earth's surface had a tropical climate, to severe glacial epochs—many times during its several billion year history. For at least nine tenths of the past one billion years, the earth was warmer than it is today. These warm periods have been interrupted at intervals of roughly 250 million years by severe glacial periods of a few million years duration. Today, the earth is in a warming trend following such a glacial epoch—the Pleistocene. In "Early Man," E. C. Howell reports that the annual mean temperature of Paris about 20,000 years ago was probably 11° F. colder than it is now.

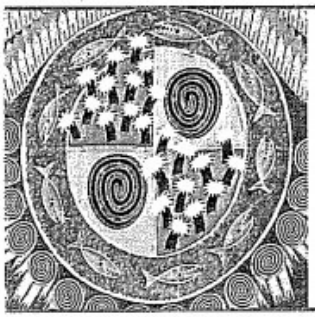
What are the prospects for the year 2000 and beyond? Are the increases



14. Imperial Oil chairman and CEO Robert Peterson wrote an article that I read titled "A Cleaner Canada " in the publication: Imperial Oil Review as published in the summer of 1998. **Attachment 7**. **Page 4** third paragraph Mr. Peterson states: *Carbon dioxide is not a pollutant but an essential ingredient of life on this planet – the plant world cannot live without it.* This appears to conflict with decades worth of concerns noted in their previous reports.

I believe there is a clear and positive connection between strong economic growth and a healthy environment. Indeed, I view economic growth as a prerequisite for fulfilling the aspirations of all Canadians by providing a better standard of living, advances in education and improved public health, and by generating the funds for the protection of the environment. Some environmental activists, on the other hand, are more inclined to view continuing economic growth as a destructive force, resulting in the depletion of our country's natural resources and damage to the environment.

The link between economic growth – driven largely by fossil fuel consumption – and environmental quality continues to be a subject of great debate. Recently, a major study conducted at Princeton University in the United States attempted to define the link between these two factors. The study found that initially environmental quality declines as a result of economic growth. But as people's incomes rise, a turnaround occurs. At a certain level of per capita income, the quality of the environment improves and continues to improve as incomes rise. This suggests that economic growth and environmental improvement are compatible.



IN FACT, DESPITE ALL THIS INDUSTRIAL ACTIVITY, THE WATER OF THE ST. CLAIR IS TODAY AMONG THE CLEANEST RIVER WATER IN THE GREAT LAKES SYSTEM

FINALLY, I WOULD LIKE TO TURN TO A TOPIC THAT MANY people think is related to air quality and pollution. I refer to global warming. The debate over this controversial issue centres around whether the burning of fossil fuels, by emitting so-called heat-trapping "greenhouse" gases (primarily carbon dioxide), will cause temperatures around the world to rise to the point where we will be faced with a planetary disaster.

It is important to understand that this issue has absolutely nothing to do with pollution and air quality. Carbon dioxide is not a pollutant but an essential ingredient of life on this planet – the plant world cannot live without it. Furthermore, the question of whether or not the trapping of "greenhouse" gases will result in the planet's getting warmer – and I will comment on this shortly – has no connection whatsoever with our day-to-day weather.

Nevertheless, it seems to have become fashionable for some media and environmental groups to lay international scientists, has found no indications that instances of extreme weather have increased in a global sense through the 20th century.

One thing is clear in this debate. There is absolutely no agreement among climatologists on whether or not the planet is getting warmer or, if it is, on whether the warming is the result of man-made factors or natural variations in the climate. As an article in the May 1998 issue of *National Geographic* stated: "If the [warming] trend continues, it could alter climate patterns worldwide....

"Or it might not. Global climate depends on combinations of factors interacting in subtle and complex ways that we do not yet fully understand. It is possible that the warming observed during this century may have resulted from natural variations...."

Nor is there any agreement on whether or not the impact – if the planet does get warmer – will be serious and what should be done about it. There has been no shortage of experts willing to testify for either side in this debate. Space does not allow me to summarize the various scientific arguments that have been marshalled for and against the case for global warming. I will say that given the amount of money and scientific resources that are being allocated to this matter in many countries, I believe that, over time, an answer will emerge that will meet with general consensus among the international scientific community. However, we are a long way from that answer today and, at this stage, I feel very safe in saying that the view that burning fossil fuels will result in global climate change remains an unproved hypothesis.

This thought, however, is not shared by the government of Canada. At an international conference on climate change held in Kyoto, Japan, at the end of last year, the federal government undertook to reduce Canadian emissions of carbon dioxide and

15. I found an online biography of Mr. Robert Peterson which states the following in **Attachment 8** :

Mr. Robert B. Peterson also known as Bob, B.Sc., M Sc served as the Chief Executive Officer of Imperial Oil Ltd. until April 2002 and served as its President unil January 2002. Mr. Peterson served as the Chairman of Imperial Oil Ltd. Until April 2002. He has been an Independent Director of MGM Energy Corp. Since January 11, 2007. He was a Director of RBC Financial Group of Athene Annuity & Live Assurance Company since 1992. He served as a Director of Royal Bank of Canada from September 10 1992 to February 29, 2008. He holds Batchlor of Science and Master of Science in Chemical Engineering from Queen's University.

16, To have a CEO of Imperial Oil write an entire 4 page article is unsual. This article had to be initiated or vetted from the company or from higher up. The question is why and for what purpose? The wording of it lacks the tact of a reasonably educated business man. There are sections that in my view, appear somewhat hostile and belittling.

17. Imperial Oil Climate Change corporate stance in **Attachment 9**, I observed that it states the following:

We believe that climate change is an important issue for all Canadians. But we also believe that fossil fuels will continue to provide most of the world's energy supply for the foreseeable future.

18. I observe that the views of Imperial Oil's Climate Change position conflicts with a vast collection of international studies that I have listed in a Climate Change Research Summery, **Attachment 10**. The list which identifies climate risks and identifies oil and fossil fuel investments as stranded assets. Many reports speak on the risks specific to C02. (List of reports not exhaustive)

19. **Attachment 11** is a study abstract titled "Greenhouse-Gas Emission Targets for Limiting Global Warming to 2°C," was published in April 2009 in *Nature*, the prestigious science journal. It was the work of researchers from Germany, the UK and Switzerland, led by Malte Meinshausen, a climatologist at Germany's Potsdam Institute for Climate Impact. The abstract shows we can only burn 565 more gigatons of carbon dioxide and stay below 2°C of warming— anything more than that risks catastrophe for life on earth.

20. **Attachment 12** is the The Paris Accord that limits emissions to 1.5°C temperature rise with transition to low emission systems.

21. I observed that Canada signed the Paris Accord on Earth Day, April 26, 2016. See **Attachment 13**

22. In **Attachment 9**, I observed how Imperial Oil states the following:

In Ontario our cogeneration plant can provide about 60 percent of the Sarnia site's electricity needs through clean burning natural gas and reduces our dependence on the Ontario electricity grid.

23. Attachment 14, is an infograph I provide from the Union of Concerned Scientists illustrating the C02 risks associated with the emissions of Natural Gas. In otherwords, it is not as "clean" burning as Imperial Oil suggests.

24. **Attachment 14** is an article I read titled: Oil Sands Are 'Hemorrhaging Red Ink,' by Mychaylo Prystupa published 18 March 2016 in the Tyee. In the article, Former CIBC Chief Economist Jeff Rubin states:

"Hanging over the oil sands industry like the Sword of Damocles," Rubin said, "is the fact that they are hemorrhaging red ink. At today's prices, the oil sands are not commercially viable."

The problem, he said, isn't that the industry "has been targeted by sanctions or by environmental groups.The problem has been that oil imports in the United States have been halved over the last five years."

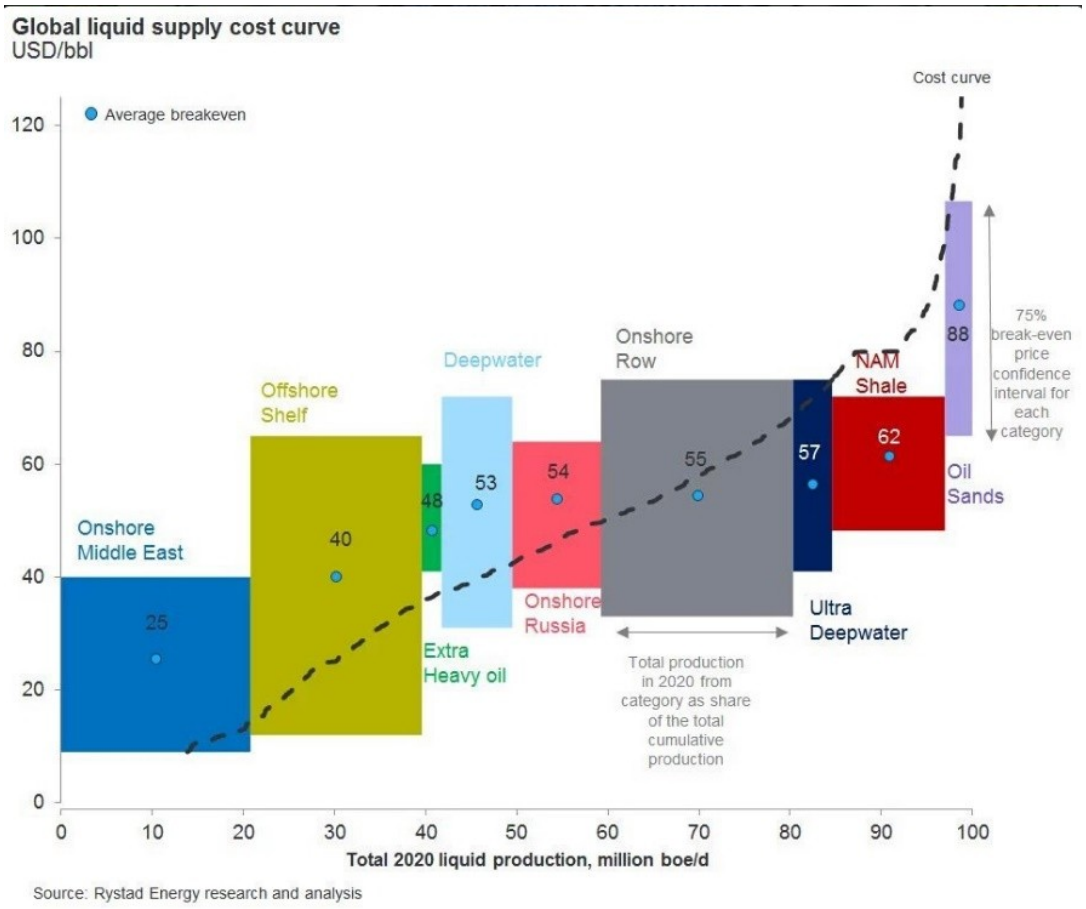
The world is awash in oil. The so-called "shale gas revolution," using fracking technology in the U.S., has brought cheap shale oil to the surface in abundance in North Dakota and Texas. That, plus the actions of Saudi Arabia and its OPEC partners to flood the market with low-cost oil, has crashed benchmark global oil prices from highs above $100 a barrel two years ago, to prices today in the high $30 range.

Worse, the discounted price that Alberta oil producers get -- the so-called "western Canadian select" price -- is now around $15 per barrel.

"At those prices, not only does the planned expansion of the oil sands, from 2.5 to four or five million barrels per day, have no economic context," Rubin asserted, it "could not be funded by any financial institution in Canada."

Instead, he said, "the question becomes: how long can this sector [survive] when it's losing $15 to $25 a barrel?"

25. **Attachment 15** is a report I reviewed written by Per Magnus Nysveen, Head of Analysis, Rystad Energy published January 12, 2015. It features a Global liquids supply cost curve. The break even cost recovery for oil sands does not appear likely with today's oil prices.



26. I provide information found on the Alberta Dashboard website of the Alberta Provincial Government. It features the 2015 and 2016 prices for WCS Oil. The value of the Alberta oil from Jan-March 2016 averaged $19.21 per barrel as noted in **Attachment 16**. (This was before the Fort McMurray Fire.)

WCS Oil ($US/bbl)

MARCH				JAN - MAR (AVERAGE)		
TREND	2015	2016	% CHANGE	2015	2016	% CHANGE
↓	$34.76	$23.46	-32.5%	$33.90	$19.21	-43.3%

Source: Alberta Energy (Jan 2009 to present)

Analysis

PUBLISHED - Apr 29, 2016

The West Texas Intermediate (WTI) price of oil, often a world reference price quoted in the media, averaged US$37.96 a barrel in March 2016, 20.7% lower than it was a year earlier.

Western Canada Select (WCS), the price obtained for many Alberta producers for oil, was down from US$34.76 in March 2015 to US$23.46 in March 2016, a fall of 32.5%. However, it was up US$7.16 from February.

The March price differential of WTI over WCS was US$14.50.

27. I respect the fact that Imperial Oil is a stock that has helped to support universities, endowment funds, pensions and soverignty funds for years, however it lacks fiscal prudence to suggest that this legacy will continue when we know the cost recovery is unlikely for oil sands projects. I believe investors deserve the right to be reasonably informed of these economic risks so we can protect individuals, institutions and pensioners for the long term.

28. For decades Imperial Oil categorized C02 as a critical environmental issue however in the 1990's corporate efforts were made to discredit climate change science and to downplay the risks. I include **Attachment 17** which features a list of climate denying reports as gathered by Greenpeace showing how these studies were funded by Exxon, the parent company of Imperial Oil.

29. I observed an article dated Dec. 9, 2015 in Fortune titled: Exxon Is Starting To Feel The Heat On Climate Change. It was a commentary by Elanor Bloxham. See **Attachment 18.** It states:

ExxonMobil has had a long history of sparring with investors on various issues, including climate risks, governance, and executive compensation. Information requests by shareholders on Exxon's political contributions, for example, go back at least as far as 1975, according to Exxon's proxy statements.

The wrangling was exacerbated by former Exxon CEO Lee Raymond's attitudes and outsized personality. In 2001, theWall Street Journal described Raymond's annual meeting behavior by saying he "belittled those [shareholders] who opposed his positions. (Raymond is now lead independent director at JPMorgan Chase.)*

*This was the passage that made me wonder if Mr. Raymond was involved with the drafting of Mr. Peterson's Article, A Cleaner Canada as seen in **Attachment 7**.

30. Imperial Oil states that fossil fuels will continue to provide most of the world's energy supply however this conflicts with the mandate of the Paris Accord that must limit global temperature rise to 1.5 degrees. I lllustrate this with **Attachment 19**, an article titled, Oil Sector 'is Doomed' in a 1.5° World, Says Ex-Industry Exec. The article was published on Feb.18, 2016, by Ross Belot in Ipolitics. It states:

Belot concludes that "if the world moves to limit the increase in temperature to 2°C than the oilsands sector probably cannot grow, although natural gas may have some use. If the world moves to 1.5°C, then the oilsands sector has no future at all—and even Canada's natural gas production is questionable on a long term basis."

That means the task for provincial premiers is to "position those parts of their economies that are outside the oil and gas sector for future, by pushing green electrification and carbon pricing to drive the necessary changes in the most efficient manner." As for national targets, "itmakes sense to look at Canada's economy in two baskets: oil and gas and everything else."

31. **Attachment 20** is an article I read produced by West Coast Environmental Law titled: Not only #ExxonKnew about climate change, but its Canadian subsidiary #ImperialKnew too. It was published 5 May, 2016 In the article it states:

Rather than working to make alternative sources of energy available to its customers, the company misled its share-holders, funded public misinformation campaigns and lobbied against real global action on climate change.

In legal language, they did not act like a "reasonable person" that takes responsibility for what (up until then) might have been the unintended results of their actions.

The world would be very different if Exxon and the other fossil fuel companies began, in the 1970s, to shift their investments from oil and gas to electrification and renewables, to take cradle-to-grave responsibility for their product, and to ensure that their prices reflected the full costs of their products.

Even now, Exxon is telling its shareholders that it intends to produce oil and gas undeterred, with no expectation that they will need to rein in their production or to pay their fair share of the harm caused.

32. Attachment 21 is an article titled: Some oil companies undeterred as global leaders sign on to Paris climate deal by Bruce Cheadle of Canadian Press published April 17, 2016. It states:

And Exxon, which owns 70 per cent of Imperial Oil, isn't buying the talk of "stranded assets" that flared before and since the Paris agreement.

"We expect that oil, natural gas and coal – the three fuels that together built the modern economy – will continue to meet almost 80 per cent of the world's energy needs through 2040," says Exxon's 2016 energy outlook, which predicts oil demand will rise 30 per cent over the next 24 years.

"We expect oil to continue to be the world's leading fuel, driven by demand for transportation fuels and by the chemical industry, where oil provides the feedstock to make plastics and other advanced materials," says the outlook.

Both Exxon and Chevron had been seeking to block shareholder proposals at next month's annual general meetings that dealt with transparency over the business impact of global carbon emissions policies. The U.S. Securities and Exchange Commission ruled this month that the companies must include the shareholder proposals at their AGMs.

The last document requires a fee to print but otherwise it is free to review online. It is a web based article titled, "There Is No Doubt" : Exxon knew C92 pollution was a global threat by late 1970's by Brenda De Melle and Kevin Grandia published Tuesday, April 26, 2016. This is the document which inspired me to submit this affidavit for review. Website here:

http://www.desmogblog.com/2016/04/26/there-no-doubt-exxon-knew-co2-pollution-was-global-threat-late-1970s

Sworn in the City of _____ in Waterloo Region, in the Province of Ontario

on _____(date)

_____ _____

Commissioner for taking Affidavits **Name**