

A: Bureau des Audiences Publiques sur l'Environnement

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<u>Sujet: La Construction de reservoirs additionels d'entreposage de produits liquides</u> Montreal –Est par la Compagnie CANTERM Terminaux canadiens inc.

We are a not-for-profit trade association representing independent gasoline retailers and fuel marketers across Canada. Our mission is to ensure adequate and fair competition at the wholesale and retail levels of fuel marketing in Canada and to fairly promote the blending and marketing of renewable fuels, all for the benefit of consumers of fuel products in Canada. (More about the association may be found at www.cipma.org)

We fully support the proposed expansion of the CANTERM for the following reasons:

The expansion of the CANTERM facilities is extremely important to the security of supply of gasoline and heating oil to the Province of Ontario, Quebec and the Atlantic provinces. Without adequate storage in Quebec, Quebec and Ontario's ability to import fuel is reduced. This jeopardizes consumers' access to product. Because the cost of importing by independent (non-refiners) marketers keeps a lid on the wholesale price of fuels in Quebec and therefore Ontario and Atlantic Canada, refiners' ability to price fuel higher than the import cost is restricted. Therefore, with expanded capacity at this terminal, more competition from independent wholesalers and retailers is possible which then results in downward pressure on consumer prices.

In addition, tankage and blending facilities at this terminal are critical to the expansion of renewable fuels in Quebec and Canada. With additional tanks, the required segregation, storage and blending of renewable diesels and ethanol is improved, enabling improved market penetration of these environmentally important fuels.

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