

Joint venture companies



# LNG Canada Export Terminal Project

**Impact Assessment Agency of Canada  
2024 – 2025 Annual Report**

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# Executive Summary

The LNG Canada Export Terminal Project (LNG Canada) is a liquefied natural gas (LNG) export facility located in northwest British Columbia, in the District of Kitimat and in the traditional territory of the Haisla Nation. LNG Canada is comprised of a LNG facility and supporting infrastructure, including LNG storage and marine loading facilities, and temporary construction-related infrastructure and facilities.

On June 17, 2015, LNG Canada received the Decision Statement from the Canadian Environmental Assessment Agency (now known as the Impact Assessment Agency of Canada (IAAC)) that established conditions that LNG Canada must comply with. The Decision Statement was amended on April 6, 2021, revising existing conditions related to marine mammals. This Annual Report provides information and updates related to the Decision Statement conditions for the period April 1, 2024, to March 31, 2025 (known as the reporting year).

LNG Canada is currently being constructed by LNG Canada Development Inc., JGC Fluor BC LNG Joint Venture (JFJV), and various subcontractors. JFJV is the Engineering, Procurement, and Construction (EPC) Contractor responsible for implementation of environmental programs and controls identified in permits, approvals, authorizations, and associated management plans during construction; and developing select deliverables to prepare for operations prior to hand-over to LNG Canada Development Inc. LNG Canada Development Inc. is also overseeing select portions of work, outside of JFJV scope.

## 1. Management Systems

LNG Canada is committed to executing a high standard of environmental management and compliance in all its activities. The LNG Canada Health, Safety, Security, and Environmental (HSSE) Management System provides a systematic HSSE structure composed of a framework, policies, standards, guidelines, premises, specific plans, procedures, and processes. The LNG Canada Compliance Management System, a component of the LNG Canada HSSE Management System, details processes that are in place to ensure the conditions of the IAAC Decision Statement are documented, tracked, and actioned.

LNG Canada continually re-evaluates mitigation and monitoring measures to verify that activities remain in compliance with regulatory requirements and conform to LNG Canada commitments and implements adaptive management as appropriate.

## 2. Activities within the Reporting Year

Construction activities during this reporting year included (but are not limited to) many milestones, such as the construction of the Tug Berth, energization of substations, introduction of fuel gas into

the facility, commenced use of the flare systems, completion of construction at the River Water Intake and completed activities at the LNG Storage Tank in preparation for cooldown.

The operations activities during this reporting year were associated with planning/preparation tasks, including technical assessments and modelling to support the development of permit applications and the development of management plans specified under permits, including the Environmental Assessment Certificate (EAC), issued by the B.C. Environmental Assessment Office (EAO).

No decommissioning activities took place during the reporting year.

### **3. Community and Indigenous Groups Communications and Consultation**

LNG Canada has committed to transparent, frequent communications and consultation with Indigenous groups and the local communities (Kitimat and Terrace). LNG Canada's communications and engagement program is premised on early engagement to facilitate an adaptive management approach, where comments, concerns, and questions can be received and responded to. Information is shared and input sought through a range of initiatives – website, social media, telephone line and email, and open houses. The above information sharing initiatives have been designed with input from Indigenous groups, stakeholders, and residents.

LNG Canada continues to adhere to the Community Feedback Process to provide an ongoing and transparent means for the community to raise questions, concerns, and grievances, and have them addressed in a timely and consistent manner.

LNG Canada is committed to ensuring Indigenous groups that may be impacted by the Project are engaged and consulted on applicable processes, activities, permits, and conditions. During the reporting year, Indigenous groups were consulted for several plans and processes.

### **4. Conditions Performance**

The landscape surrounding LNG Canada contains a range of terrestrial, aquatic and wetland habitats that support populations of wildlife and fish. These ecosystems are important not only to the health of the natural landscape, but also to residents and Indigenous groups who rely on the environment for recreation and traditional use.

#### **A) Fish and Amphibian Habitat and Salvage**

LNG Canada holds four authorizations under the Fisheries Act; three for freshwater (known as “FAA1”, “FAA2”, and “FAA3”); and one for the marine environment.

During the reporting year, effectiveness monitoring was undertaken for the habitat offsets developed under the applicable FAAs.

During the reporting year, fish salvage and relocation occurred during maintenance and improvement works in the Anderson Creek Realignment Channel. During the reporting year an approximate total of 36,631 fish were salvaged from Anderson Creek and side channel. Fish species varied depending on the habitat types salvaged and included salmonids and stickleback. Under the direction of fisheries QEP, all salvaged fish were released into habitat of a similar type and quality. Most of the fish salvage efforts occurred during the summer of 2024. The fish salvage efforts are expected to reduce greatly in the next reporting year as the site preparation, creek diversions and habitat off setting have been completed. During the next reporting year, areas where there is a potential for fish salvage have been identified as Anderson Creek realignment channel for annual operational maintenance.

Minor repairs of the Sumgas Creek offset commenced and were completed in July 2024. This work resulted in an additional 252 fish salvaged. No future salvages are anticipated for the offset.

## **B) Wetlands**

Condition 4.2.4 of the Federal Decision Statement requires the project to conduct follow-up monitoring prior to and during construction to detect potential unanticipated loss of wetland functions and implement adjustments to mitigate loss of those wetland functions.

The wetland monitoring report provides the monitoring objectives, methods, and results for baseline conditions (2018/2019) and five years of wetland monitoring during Project construction (2020, 2021, 2022, 2023, and 2024), and provides a discussion of the current state of wetland functions. Construction was substantially completed in 2024, and commissioning of the Project commenced in 2024. As such, 2024 was the final year of monitoring.

Overall, the wetlands located adjacent to the Project footprint continue to provide ecological functions in a manner consistent with the baseline results recorded prior to construction (2018/2019) despite some observed interannual variation among some indicators of wetland functions.

Although some changes in wildlife habitat suitability ratings have been observed during the monitoring program, no overall loss of habitat functions has been observed as they pertain to wildlife habitat suitability for the targeted species and species groups. No adjustments to compensation measures are recommended for the wetlands adjacent to the Project footprint, as there have not been permanent changes in:

- Hydrological functions (i.e., no substantial change in hydrologic regime)
- Biogeochemical functions (i.e., pronounced change in water quality or loss of vegetation cover)
- Habitat functions (i.e., reduction in red- or blue-listed wetland extent or reduction in wildlife habitat suitability ratings).

Within the reporting year, LNG Canada completed the annual adjacent wetland assessment, and no adverse effects to adjacent wetlands resulting from construction were identified.

Effectiveness monitoring was completed on a wide range of habitats, with no major management issues were observed during the 2024 surveys.

### **C) Migratory Birds**

During the reporting year, clearing activities were limited. When clearing took place during bird breeding windows, pre-disturbance bird surveys were completed to ensure that no potentially active nests were present within the active construction area, and any identified nests were subsequently protected by implementing buffer zones. Active nests are monitored from a distance to confirm and track the status and ensure that construction activities in the vicinity do not impact nesting or fledging. The buffer can only be removed once the QEP has determined that the nest is no longer active, and no other nests exist.

During the reporting year, 51 pre-disturbance bird nest surveys were completed. Across the Project site, 36 active nests were identified through a mix of pre-disturbance bird nest surveys and environmental monitor identification on various Project infrastructure.

### **D) Human Health**

LNG Canada is committed to managing noise and air emissions during activities and has taken steps to implement mitigations as appropriate through the development and implementation of Environmental Management Plans. During the reporting year, twelve noise complaints were received. In terms of air quality, monitoring data from the three continuous stations identified in Permit PA-110588—Kitamaat Village (Kitimat Haisla Village), Kitimat Riverlodge, and Kitimat Whitesail—showed that concentrations of nitrogen dioxide (NO<sub>2</sub>), sulfur dioxide (SO<sub>2</sub>), and fine particulate matter (PM<sub>2.5</sub>) did not exceed the BC Ambient Air Quality Objectives (BCAAQO).

### **E) Archaeological and Heritage Resources**

LNG Canada has identified one area of archaeological or cultural significance, which was relocated in a previous reporting year. There were no chance finds during the reporting year.

### **F) Accidents or Malfunctions**

There were no accidents or malfunctions during the reporting year.

# Acronyms/Abbreviations

AIA	Archaeological Impact Assessment
BAT	Best Available Technology
BC	British Columbia
CCME	Canadian Council of Ministers of the Environment
CEAA	Canadian Environmental Assessment Act, 2012
CEMP	Construction Environmental Management Plan
CVL	Cedar Valley Lodge
DFO	Fisheries and Oceans Canada
EAC	Environmental Assessment Certificate (BC)
EAO	Environmental Assessment Office (BC)
EM	Environmental Monitor
EMP	Environmental Management Plan
EPC	Engineering, Procurement and Construction
ERP	Emergency Response Plan
ESC	Erosion and Sediment Control
FAA	Fisheries Act Authorization
FAA1	Fisheries Act Authorization – LNG Canada Workforce Accommodation Centre (15-HPAC-00918)
FAA2	Fisheries Act Authorization – LNG Processing Facility (16-HPAC-00220)
FAA3	Fisheries Act Authorization – Supporting Infrastructure (16-HPAC-01079)
FAA Marine	Fisheries Act Authorization – LNG Canada (15-HPAC-00585)
FOR	Ministry of Forests (BC)
Ha	Hectare
HSSE	Health, Safety, Security, and Environment
IAAC	Impact Assessment Agency of Canada (formerly Canada Environmental Assessment Agency)
JFJV	JGC Fluor BC LNG Joint Venture (LNG Canada EPC Contractor)
KRSC	Kitimat River Side Channel
LNG	Liquefied Natural Gas
LNG Canada	LNG Canada Development Inc.
MAP	Marine Activities Plan

MATMP	Marine Access Traffic Management Plan
MMEZ	Marine Mammal Exclusion Zone
MMO	Marine Mammal Observer / Marine Mammal Observation
MMP	Marine Monitoring Plan
MMMMP	Marine Mammal Management and Monitoring Plan
MOF	Material Offloading Facility
OEMP	Operations Environmental Management Plan
Project	LNG Canada Export Terminal Project
QEP	Qualified Environmental Professional
RWI	River Water Intake
SMR	Social Management Roundtable
WAC	Workforce Accommodation Centre

## Concordance Table

Section Topic	Description	Clause	Sub clause	Report Section
Decision on environmental effects referred to in subsection 5(1) of CEAA 2012	In accordance with paragraph 52(1)(b) of CEAA 2012, after considering the report of the EAO on the Designated Project and the implementation of mitigation measures that I consider appropriate, I determined that the Designated Project is not likely to cause significant adverse environmental effects referred to in subsection 5(2) of CEAA 2012. In accordance with subsection 53(2) of CEAA 2012, I have established the conditions below in relation to the environmental effects referred to in subsection 5(2) of CEAA 2012, with which LNG Canada Development Inc. must comply.	NA	NA	1.0
Decision on environmental effects referred to in subsection 5(1) of CEAA 2012	These conditions are established for the sole purpose of the Decision Statement issued under the Canadian Environmental Assessment Act, 2012. They do not relieve the Proponent from any obligation to comply with other legislative or other legal requirements by the federal, provincial or local governments. Nothing in this Decision Statement shall be construed as reducing, increasing, or otherwise affecting what may be required to comply with all applicable legislative or other legal requirements.	NA	NA	1.0 3.1
General Conditions	The Proponent shall, throughout all phases of the Designated Project, ensure that its actions in meeting the conditions set out in this Decision Statement are informed by the best available information and knowledge, are based on validated methods and models, are undertaken by qualified individuals, and have applied the best available economically and technologically feasible strategies.	2.1	2.1	1.2 2.0
General Conditions	The Proponent shall, where consultation is a requirement of a condition set out in this Statement: <ul style="list-style-type: none"> <li>• provide written notice of the opportunity for the party or parties to present their views on the subject of the consultation;</li> <li>• provide sufficient information and a reasonable period of time to permit the party or parties to prepare their views;</li> <li>• provide a full and impartial consideration of any views presented;</li> <li>• and advise the party or parties that have provided comments on how the views and information received have been considered.</li> </ul>	2.2	2.2.1	4.2
General Conditions	The Proponent shall, where consultation with Aboriginal groups is a requirement of a condition set out in this Decision Statement, and prior to the initiation of consultation, communicate with each Aboriginal group on the most appropriate manner in which to satisfy the consultation requirements referred to in condition 2.2.	2.3	2.3	4.3 4.4

Section Topic	Description	Clause	Sub clause	Report Section
General Conditions	<p>The Proponent shall, where a follow-up program is a requirement of a condition set out in this Decision Statement:</p> <ul style="list-style-type: none"> <li>undertake monitoring and analysis to verify the accuracy of the environmental assessment as it pertains to the condition and/or to determine the effectiveness of any mitigation measure(s);</li> <li>where the results of the monitoring and analysis indicate issues with respect to the accuracy of the environmental assessment or the effectiveness of any mitigation measures that may lead to adverse environmental effects, identify the means by which it will determine whether additional mitigation measures are required, including the need for consultation with other parties in reaching that determination; and</li> <li>implement additional mitigation measures, as appropriate</li> </ul>	2.4	2.4.1 2.4.2 2.4.3 2.4.4	3.2
General Conditions	<p>The Proponent shall, from the reporting year where construction starts, submit to the Agency an annual report, including an executive summary of the annual report in both official languages. The annual report is to be submitted by the Proponent no later than June 30 following the reporting year. The Proponent shall document in the report:</p> <ul style="list-style-type: none"> <li>implementation activities undertaken in the reporting year for each of the conditions;</li> <li>how it has considered and incorporated the factors set out in condition 2.1 in the implementation of the conditions set out in this Decision Statement;</li> <li>for conditions set out in this Decision Statement for which consultation is a requirement, how it has considered any views and information received during or as a result of the consultation;</li> <li>the results of the follow-up program requirements identified in conditions 3.14 , 4.2.4, 2.5.4,4.5, 5.3, 6.3.6 and 7.2; and</li> <li>any additional mitigation measures implemented or proposed to be implemented, as determined under condition 2.4</li> </ul>	2.5	2.5.1 2.5.2 2.5.3 2.5.4 2.5.5	Section 2 onwards
General Conditions	<p>The Proponent shall publish on the Internet, or any similar medium, the annual report, the executive summary referred to in condition 2.5, the Wetland Compensation Plan referred to in condition 4.3, the plan to offset the loss of fish and fish habitat referred to in condition 3.11, the Archaeological and Heritage Resources Management Plan referred to in condition 8.1, the Decommissioning Plan referred to in condition 9.1, and the implementation schedule referred to in condition 11, following submission of these documents to the parties referenced in the respective conditions. The Proponent shall keep these documents publicly available for twenty-five years following the end of operation or until the end of decommissioning of the Designated Project, whichever comes first.</p>	2.6	2.6	1.4 2.3 4.2.1
General Conditions	<p>The Proponent shall notify the Agency in writing no later than 60 days after the day on which there is a transfer of ownership, care, control or management of the Designated Project in whole or in part.</p>	2.7	2.7	1.5

Section Topic	Description	Clause	Sub clause	Report Section
General Conditions	In the event that there is a transfer of ownership, care, control or management of the Designated Project from LNG Canada Development Inc. to another party, that party becomes the Proponent of the Designated Project and is bound by the conditions found in this Decision Statement.	2.8	2.8	1.5
Fish and Fish Habitat	The Proponent shall implement erosion control measures and sediment control measures during all phases of the Designated Project.	3.1	3.1	5.3.3.1
Fish and Fish Habitat	The Proponent shall revegetate disturbed riparian areas, using native vegetation, as soon as practicable after construction.	3.2	3.2	5.3.3.2
Fish and Fish Habitat	The Proponent shall isolate construction activities from adjacent freshwater fish habitat.	3.3	3.3	5.3.3.1
Fish and Fish Habitat	The Proponent shall salvage and relocate fish during in-water work requiring isolation of freshwater fish habitat.	3.4	3.4	5.3.1
Fish and Fish Habitat	The Proponent shall design the water intake for the Designated Project to avoid or reduce injury to and mortality of fish, including the risk of entrainment of eulachon larvae. The Proponent shall install the water intake that is so designed and shall monitor the operation of that intake to determine whether or not injury to and mortality of fish is avoided or reduced. Based on the monitoring results, the Proponent shall, as appropriate, modify the water intake or implement other measures to avoid or reduce injury to and mortality of fish.	3.5	3.5	5.0
Fish and Fish Habitat	The Proponent shall apply low-noise methods or sound dampening technologies to reduce adverse effects to fish from exposure to underwater noise during pile installation. In doing so, the Proponent shall: <ul style="list-style-type: none"> <li>minimize impulsive noise emitted by construction activities, including by giving preference to the use of vibratory pile-driving over impact pile-driving unless not technically feasible;</li> <li>report annually the occurrence(s) when impact pile-driving was implemented including a description of why vibratory pile driving was not technically-feasible; and</li> <li>use sound attenuation device(s) when impact pile-driving underwater.</li> </ul>	3.6	3.6	5.2
Fish and Fish Habitat	The Proponent shall, prior to the start of in-water construction activities; establish the location and timing of sensitive life stages and habitat occupancy for fish (including marine mammals) in consultation with Fisheries and Oceans Canada and Aboriginal groups; advise the Agency of that information; and shall conduct in-water construction activities during the timing windows of least risk to those life stages and habitat occupancy, unless otherwise authorized by Fisheries and Oceans Canada.	3.7	3.7	5.2

Section Topic	Description	Clause	Sub clause	Report Section
Fish and Fish Habitat	When conducting in-water construction activities outside the timing windows of least risk referred to in condition 3.7, the Proponent shall implement additional mitigation measures following consultation with Fisheries and Oceans Canada, including sediment containment when dredging and using sediment disposal methods and equipment that will limit re-suspension of sediments.	3.8	3.8	5.2
Fish and Fish Habitat	<p>To avoid detrimental behavioral change in or injury to marine mammals, the Proponent shall implement a marine mammal detection and response plan during all construction activities that pose a risk to marine mammals. In doing so, the Proponent shall:</p> <ul style="list-style-type: none"> <li>• identify the construction activities that generate underwater noise levels greater than 160 and 180 decibels at a reference pressure of one micropascal and the periods of time when those activities will occur;</li> <li>• for cetaceans, establish the boundary of the exclusion zone for each construction activity identified in condition 3.9.1 at the distance from the activity that the underwater noise level reaches 160 decibels;</li> <li>• for all other marine mammals, including pinnipeds, establish the boundary of the exclusion zone for each construction activity identified in condition 3.9.1 at the distance from the activity that the underwater noise level reaches 180 decibels or at a distance of 150 meters, whichever is the greatest distance;</li> <li>• employ a marine mammal observer and specify the role of that person in observing and reporting marine mammals in the exclusion zone during construction activities identified in conditions 3.9.2 and 3.9.3 during construction activities identified in condition 3.9.1;</li> <li>• stop construction activities identified in condition 3.9.1 if marine mammals are observed within the exclusion zone(s) or reasonably appear to be about to enter the exclusion zone(s) identified in condition 3.9.2 and 3.9.3;</li> <li>• start or restart activities only once it has been visually confirmed that the marine mammal(s) are not within the exclusion zone of if a minimum of 30 minutes has elapsed since the marine mammal was last sighted within the exclusion zone(s); and</li> <li>• specify mitigation measures, such as sound dampening technology and soft-start procedures to reduce construction noise levels in the exclusion zone.</li> </ul>	3.9	3.9.1 3.9.2 3.9.3 3.9.4 3.9.5	5.2
Fish and Fish Habitat	LNG carriers associated with the Designated Project shall respect speed profiles applicable to the operation of the Designated Project, subject to navigational safety, to prevent or reduce the risks of collisions between LNG carriers and marine mammals and shall report any collision with marine mammals to Fisheries and Oceans Canada, and notify Aboriginal groups.	3.10	3.10	N/A No LNG carriers in reporting period

Section Topic	Description	Clause	Sub clause	Report Section
Fish and Fish Habitat	The Proponent shall mitigate impacts to fish and fish habitat and, in consultation with Fisheries and Oceans Canada, develop and implement a plan to offset the loss of fish and fish habitat associated with the carrying out of the Designated Project.	3.11	3.11	5.1
Fish and Fish Habitat	For any fish habitat offsets area proposed in any offsetting plan under condition 3.11, and prior to submitting the offsetting plan to Fisheries and Oceans Canada, the Proponent shall determine whether there are adverse effects: <ul style="list-style-type: none"> <li>• on migratory birds and their habitats;</li> <li>• on terrestrial species, including amphibians and reptiles, and their habitats;</li> <li>• on species at risk and their habitat;</li> <li>• on the current use of lands and resources for traditional purposes by Aboriginal peoples;</li> <li>• on navigation;</li> <li>• from potential sources of contamination including polycyclic aromatic hydrocarbons, dioxins, furans, copper and zinc on the receiving environment.</li> </ul>	3.12	3.12.1 3.12.2 3.12.3 3.12.4 3.12.5 3.12.6	5.1
Fish and Fish Habitat	The Proponent shall, if there are adverse effects on any of the elements of condition 3.12, avoid or lessen those adverse effects.	3.13	3.13	5.1
Fish and Fish Habitat	In consultation with Fisheries and Oceans Canada and Aboriginal groups, the Proponent shall develop and implement a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of mitigation measures identified under conditions 3.1 to 3.11 and 3.13.	3.14	3.14	5.1 5.2 5.3
Fish and Fish Habitat	The Proponent shall participate in regional initiatives relating to cumulative effects monitoring and the management of marine shipping, should there be any such initiatives during the construction and operation phases of the Designated Project.	3.15	3.15	4.5
Wetlands	The Proponent shall mitigate the adverse environmental effects of the Designated Project on wetland functions that support migratory birds, species at risk or the current use of lands and resources for traditional purposes by Aboriginal people. The Proponent shall give preference to avoiding the loss of wetlands over minimizing the adverse effects on wetlands and for managing the effects on wetlands over compensating for lost or adversely affected wetlands.	4.1	4.1	6.0 7.0

Section Topic	Description	Clause	Sub clause	Report Section
Wetlands	<p>To avoid loss of wetlands or to manage adverse effects on wetlands impacted by the Designated Project footprint and adverse effects on wetland function on and for those wetlands adjacent to the Designated Project footprint, the Proponent shall:</p> <ul style="list-style-type: none"> <li>delineate clearing boundaries prior to the commencement of construction and respect those boundaries during construction;</li> <li>maintain, where practicable, tidal flow and wildlife passage in the LNG loading line corridor between the LNG processing and storage site and the marine terminal;</li> <li>manage surface water and avoid erosion or sedimentation to maintain hydrology of adjacent wetlands and protect water quality; and</li> <li>conduct follow-up monitoring prior to and during construction to detect potential unanticipated loss of wetland functions and implement adjustments to mitigate loss of those wetland functions.</li> </ul>	4.2	4.2.1 4.2.2 4.2.3 4.2.4	6.1
Wetlands	<p>For effects on ecologically important wetlands that cannot be avoided or minimized, mitigation measures shall be set out in a Wetland Compensation Plan that shall be prepared by the Proponent in consultation with Aboriginal groups. The mitigation measures to be set out in the Wetland Compensation Plan shall include:</p> <ul style="list-style-type: none"> <li>implementing a 2:1 ratio of compensation area to the loss of ecologically important wetland area;</li> <li>identifying sites to compensate for the lost wetlands referred to in 4.3.1, that are as close to Kitimat as possible and that reflect similar wetland types and functions to those that are lost;</li> <li>a preference for wetland restoration over enhancement, and wetland enhancement over creation; and</li> <li>whenever possible, using traditional plants in the enhancement or creation of the compensation sites referred to in 4.3.2 and providing access to those sites to Aboriginal people for the purposes of gathering traditional use plants.</li> </ul>	4.3	4.3.1 4.3.2 4.3.3 4.3.4	6.2
Wetlands	The Proponent shall implement the wetland compensation plan within five years of the date of the start of construction	4.4	4.4	6.2
Wetlands	The Proponent shall implement a follow-up program to verify that the compensation wetland sites are fulfilling the functions of the wetlands they are replacing and shall implement corrective actions in respect of the compensation wetlands if the latter do not fulfill those functions. The follow-up program shall include monitoring of the compensatory wetland sites to verify that lost habitat is being restored at or on those sites, in year one, and in years three, five, and ten following the enhancement or creation of the compensating wetlands.	4.5	4.5	6.2

Section Topic	Description	Clause	Sub clause	Report Section
Migratory Birds	The Proponent shall carry out all phases of the Designated Project in a manner that protects and avoids harming, killing or disturbing migratory birds or destroying or taking their nests or eggs. In this regard, the Proponent shall take into account Environment Canada's Avoidance Guidelines. The Proponent's actions in applying the Avoidance Guidelines shall be in compliance with the Migratory Birds Convention Act, 1994 and with the Species at Risk Act.	5.1	5.1	7.0
Migratory Birds	The Proponent shall: <ul style="list-style-type: none"> <li>restrict flaring of vented emissions to the minimum required for maintenance activities or to manage emergencies;</li> <li>minimize flaring during night time and during periods of bird vulnerability; and</li> <li>adjust operational lighting to avoid attracting migratory birds.</li> </ul>	5.2	5.2.1 5.2.2 5.2.3	7.0
Migratory Birds	The Proponent shall develop and implement a follow-up program to determine the effectiveness of the mitigation measures used to avoid harm to migratory birds, their eggs and nests during all phases of the Designated Project.	5.3	5.3	7.0
Migratory Birds	The Proponent shall avoid or lessen, and monitor effects on the habitat of the Marbled Murrelet ( <i>Brachyramphus marmoratus</i> ), a species that appears on Schedule 1 of the Species at Risk Act. The Proponent shall compensate for the loss of habitat of the Marbled Murrelet as a result of the Designated Project, taking into account Environment Canada's Operational Framework for Use of Conservation Allowances.	5.4	5.4	7.1
Human Health	The Proponent shall incorporate noise and air emission reduction measures in the design of the Designated Project, and implement noise and air emission reduction measures during all phases of the Designated Project to avoid or reduce potential effects on human health, including: <ul style="list-style-type: none"> <li>complying with the Waste Discharge Regulation under British Columbia's Environmental Management Act for operational air emissions;</li> <li>applying best management practices and guidance for construction noise from the British Columbia Oil and Gas Commission's Noise Control Best Practices Guidelines; and</li> <li>complying with the operational noise requirement of the British Columbia Oil and Gas Commission's Liquefied Natural Gas Facility Regulation.</li> </ul>	6.1	6.1.1 6.1.2 6.1.3	8.0
Human Health	The Proponent shall develop and implement a mechanism for receiving noise complaints, in consultation with Aboriginal groups and other parties who may be adversely affected by the noise caused by the Designated Project and during all phases of the Designated Project, and respond in a timely manner to any noise complaint received.	6.2	6.2	8.1

Section Topic	Description	Clause	Sub clause	Report Section
Human Health	<p>The Proponent shall implement measures related to marine water quality and sediment quality, including:</p> <ul style="list-style-type: none"> <li>• prior to the commencement of dredging, establishing a shellfish and groundfish tissue baseline and using it to complete a human health risk assessment for the consumption of fish;</li> <li>• conducting an assessment of the risks and potential duration of any exceedances of Canadian Council of Ministers of the Environment’s Water Quality and Interim Sediment Quality Guidelines, and British Columbia’s Water Quality Guidelines and Working Sediment Quality Guidelines that could occur during dredging and other in-water construction activities, and identify mitigation measures to avoid such exceedances;</li> <li>• implementing mitigation measures to minimize sediment dispersion during in-water construction activities, including isolation methods;</li> <li>• conducting onsite sediment and water quality monitoring in relation to the re-suspension and bioavailability of polycyclic aromatic hydrocarbons, dioxins and furans during in-water construction activities;</li> <li>• communicating any exceedances of the Canadian Council of Ministers of the Environment’s Water Quality and Interim Sediment Quality Guidelines, and British Columbia’s Water Quality Guidelines and Working Sediment Quality Guidelines to regulatory authorities in accordance with legislative requirements and to Aboriginal groups, and implementing mitigation measures identified in condition 6.3.2 to remedy those exceedances or to reduce associated risks to human health;</li> <li>• developing and implementing a post-dredging follow-up program, in consultation with Aboriginal groups, to confirm the human health risk assessment predictions, including additional sampling of the shellfish and groundfish tissue to confirm the assessment predictions regarding the bioavailability and bioaccumulation of contaminants in fish consumed by humans. The Proponent shall communicate the results of the follow-up program to Aboriginal groups.</li> </ul>	6.3	6.3.1 6.3.2 6.3.3 6.3.4 6.3.5 6.3.6	8.2
Human Health	<p>The Proponent shall, during operation, treat any effluent discharge from the facility marine outfall pipe to meet subsection 36(3) of the Fisheries Act and British Columbia’s Water Quality Guidelines for the protection of marine life measured at the edge of the initial dilution zone.</p>	6.4	6.4	8.0 8.2

Section Topic	Description	Clause	Sub clause	Report Section
Current use of lands and resources for traditional purposes	<p>The Proponent shall develop and implement, in consultation with Aboriginal groups, a communication protocol for all phases of the Designated Project. The communication protocol shall include procedures and practices for sharing information and facilitating communication between the Proponent and the Aboriginal groups and other local marine users on the following:</p> <ul style="list-style-type: none"> <li>• location and timing of Designated Project-related construction activities;</li> <li>• location and timing of traditional activities by Aboriginal groups;</li> <li>• safety procedures, such as navigation aids and updated navigational charts;</li> <li>• location of areas where navigation is restricted for safety reasons;</li> <li>• operational speed requirements under the Canada Shipping Act, 2001 or its regulations, and general schedules of the operation of LNG carriers associated with the Designated Project;</li> <li>• ways in which to provide feedback to the Proponent on adverse effects related to navigation experienced by Aboriginal groups and other local marine users.</li> </ul>	7.1	7.1.1 7.1.2 7.1.3 7.1.4 7.1.5 7.1.6	9.0 9.1 9.2
Current use of lands and resources for traditional purposes	<p>The Proponent shall develop and implement, in consultation with Aboriginal groups, a follow-up program to verify the accuracy of the predictions made during the environmental assessment in relation to the effects of the wake generated by the Designated Project on the current use of lands and resources for traditional purposes by Aboriginal groups.</p> <p>The follow-up program shall include:</p> <ul style="list-style-type: none"> <li>• monitoring during the first two years of operation of the degree of wake generation by Designated Project-related vessels and of any adverse effects on harvesters caused by vessel wake attributable to Designated Project-related vessels at key harvest sites and during key harvest periods identified in consultation with Aboriginal groups; and</li> <li>• providing the results of the follow-up program and any corrective actions taken to Aboriginal groups.</li> </ul>	7.2	7.2.1 7.2.2	9.0
Current use of lands and resources for traditional purposes	The Proponent shall provide Aboriginal groups with the implementation schedule, updates or revisions to the implementation schedule pursuant to condition 11 at the same time these documents are provided to the Agency.	7.3	7.3	2.3

Section Topic	Description	Clause	Sub clause	Report Section
Physical and cultural heritage and structure, site or thing of historical, archaeological, paleontological or architectural significance	<p>The Proponent shall, in consultation with Aboriginal groups and local historical societies, develop and implement an Archaeological and Heritage Resources Management Plan for the Designated Project prior to construction. The Archaeological and Heritage Resources Management Plan shall take into account British Columbia’s Handbook for the Identification and Recording of Culturally Modified Trees. The Archaeological and Heritage Resources Management Plan shall include:</p> <ul style="list-style-type: none"> <li>• a description of structures, sites or things of historical, archaeological, paleontological or architectural significance (including Culturally Modified Trees) that may be encountered by the Proponent during construction;</li> <li>• a description of structures, sites or things of historical, archaeological, paleontological or procedures and practices for on-site monitoring of construction activities that may affect a structure, site or thing of historical, archaeological, paleontological or architectural significance (including Culturally Modified Trees) and for the identification and removal of these resources; and</li> <li>• a Chance Find Protocol if a previously unidentified structure, site or thing of historical, archaeological, paleontological or architectural significance (including Culturally Modified Trees) is discovered by the Proponent or brought to the attention of the Proponent by an Aboriginal group or another party during construction.</li> </ul>	8.1	8.1.1 8.1.2 8.1.3	9.0

Section Topic	Description	Clause	Sub clause	Report Section
Decommissioning	<p>The Proponent shall develop and submit to the Agency a Decommissioning Plan at least one year prior to the end of operation, consistent with any statutory or regulatory requirements in effect at that time. The Decommissioning Plan shall include a description of:</p> <ul style="list-style-type: none"> <li>any consultation undertaken during the development of the Decommissioning Plan, including any issues raised by Aboriginal groups and other parties and how they were resolved by the Proponent;</li> <li>the components of the Designated Project that will be decommissioned by the Proponent;</li> <li>the desired end-state objectives of the areas that will be decommissioned by the Proponent and those that will not be decommissioned;</li> <li>the components of the environment that may be adversely affected by decommissioning activities or by components of the Designated Project that continue in their state at the end of operation;</li> <li>how the Proponent will monitor and mitigate adverse environmental effects from decommissioning activities;</li> <li>how the Proponent will conduct in-water and land-based decommissioning activities (including the location, the scheduling and sequencing of activities);</li> <li>a strategy for progressive reclamation, if appropriate; and</li> <li>an approach to consulting Aboriginal groups and federal and provincial authorities throughout the decommissioning phase.</li> </ul>	9.1	9.1.1 9.1.2 9.1.3 9.1.4 9.1.5 9.1.6 9.1.7 9.1.8	2.4
Decommissioning	<p>The Proponent shall from the reporting year in which decommissioning begins until the end of decommissioning, submit to the Agency a written report no later than June 30 of the following reporting year. The written report shall include a description of:</p> <ul style="list-style-type: none"> <li>the decommissioning activities that took place during the reporting year;</li> <li>any adverse environmental effects identified by the proponent with respect to those decommissioning activities;</li> <li>a description of the mitigation measures that were implemented by the Proponent to mitigate or reduce those adverse effects, and consultation activities.</li> </ul>	9.2	9.2.1 9.2.2 9.2.3 9.2.4	2.4
Accidents or Malfunctions	<p>The Proponent shall take all reasonable measures to prevent accidents and malfunctions that may result in adverse environmental effects and shall implement the emergency response procedures and contingencies developed in relation to the Designated Project.</p>	10.1	10.1	10.0

Section Topic	Description	Clause	Sub clause	Report Section
Accidents or Malfunctions	<p>In the event of an accident or malfunction with the potential to cause adverse environmental effects, the Proponent shall:</p> <ul style="list-style-type: none"> <li>• notify relevant federal and provincial authorities, including the Agency of the occurrence as soon as possible;</li> <li>• implement measures to minimize any adverse environmental effects associated with the occurrence as soon as possible;</li> <li>• submit a written report to the Agency as soon as possible in the circumstances, but at the latest 30 days after the day on which the accident or malfunction took place. The written report must include: <ul style="list-style-type: none"> <li>○ the measures that were taken to mitigate the effects of the occurrence;</li> <li>○ a description of any residual environmental effects, and any additional measures required to address residual environmental effects; and</li> <li>○ if an emergency response plan was implemented, details concerning its implementation.</li> </ul> </li> <li>• as soon as possible, but no later than 90 days after the day on which the accident or malfunction took place, submit a written report to the Agency on the changes made to avoid a subsequent occurrence of the accident or malfunction.</li> </ul>	10.2	10.2.1 10.2.2 10.2.3 10.2.4	10.0
Accidents or Malfunctions	<p>The Proponent shall prepare and implement a communication strategy in consultation with Aboriginal groups that shall include:</p> <ul style="list-style-type: none"> <li>• the types of accident or malfunction requiring a notification to the respective Aboriginal groups;</li> <li>• the manner by which Aboriginal groups shall be notified of an accident or malfunction and of any opportunities to assist in the response; and</li> <li>• points of contact for the Proponent and for the respective Aboriginal groups.</li> </ul>	10.3	10.3.1 10.3.2 10.3.3	10.1
Implementation Schedule	<p>The Proponent shall submit an implementation schedule for conditions contained in this Decision Statement to the Agency, or anyone designated pursuant to section 89 of the Canadian Environmental Assessment Act, 2012, at least 30 days prior to construction. The implementation schedule shall indicate the commencement and completion dates for each activity relating to conditions set out in this Decision Statement.</p>	11.1	11.1	2.3
Implementation Schedule	<p>The Proponent shall submit an update to this implementation schedule in writing to the Agency, or anyone designated pursuant to section 89 of the Canadian Environmental Assessment Act, 2012, every two years on or before June 30, until completion of the activities.</p>	11.2	11.2	2.3

Section Topic	Description	Clause	Sub clause	Report Section
Implementation Schedule	The Proponent shall provide the Agency, or anyone designated pursuant to section 89 of the Canadian Environmental Assessment Act, 2012, with a revised implementation schedule if any change occurs from the initial schedule or any subsequent updates. The Proponent shall provide the revised implementation schedule at least 30 days prior to the implementation of the change.	11.3	11.3	2.3
Record Keeping	<p>The Proponent shall maintain a written record, or a record in an electronic format compatible with that used by the Agency, and retain and make available that record to the Agency, or anyone designated pursuant to section 89 of the Canadian Environmental Assessment Act, 2012, at a facility close to the Designated Project (local facility). The record shall include information related to the implementation of the conditions set out in this Decision Statement, and the results of all monitoring, including:</p> <ul style="list-style-type: none"> <li>the place, date and time of any sampling, as well as techniques, methods or procedures used;</li> <li>the dates and the analyses that were performed;</li> <li>the analytical techniques, methods or procedures used in the analyses;</li> <li>the names of the persons who collected and analyzed each sample and documentation of any professional certifications relevant to the work performed that they might possess; and</li> <li>the results of the analyses.</li> </ul>	12.1	12.1.1 12.1.2 12.1.3 12.1.4 12.1.5	3.5
Record Keeping	The Proponent shall retain and make available upon demand to the Agency, or anyone designated pursuant to section 89 of the Canadian Environmental Assessment Act, 2012, the information contained in condition 12.1 at a facility close to the Designated Project (or at a location within Canada and agreed upon by the Agency, should the local facility no longer be maintained). The information shall be retained and made available throughout construction and operation, and for twenty-five years following the end of operation or until the end of decommissioning of the Designated Project, whichever comes first.	12.2	12.2	3.5

# 1. Introduction

The LNG Canada Export Terminal Project (LNG Canada) is a liquefied natural gas (LNG) export facility located in northwest British Columbia (B.C.), in the District of Kitimat and on the traditional territory of the Haisla Nation. LNG Canada is comprised of a LNG facility and supporting infrastructure, including LNG storage and marine loading facilities, and temporary construction-related infrastructure and facilities. LNG Canada is committed to planning, constructing, and operating the Project in a manner that respects surrounding communities and the environment.

On June 17, 2015, LNG Canada received the Decision Statement under Section 52(1)(b) of the Canadian Environmental Assessment Act, 2012 (“IAAC Decision Statement”) from the Canadian Environmental Assessment Agency (now known as the Impact Assessment Agency of Canada (IAAC)). The IAAC Decision Statement established conditions to which LNG Canada must comply. This annual report serves to provide information and updates related to those conditions.

## 1.1. Project Overview

LNG Canada is located on approximately 400 hectares of land within the District of Kitimat, on land zoned for industrial use. LNG Canada is comprised of a variety of buildings and equipment used to process and store LNG. Supporting infrastructure includes power supply, water supply, and waste collection and treatment facilities.

LNG Canada is located in the traditional territory of the Haisla Nation, and the associated operational shipping route passes through the traditional territories of Haisla Nation, Gitga’at First Nation, Gitxaala Nation, Kitselas First Nation, Kitsumkalum Indian Band, Lax Kw’alaams Band, and Metlakatla First Nation.

LNG Canada consists of two LNG processing units referred to as “trains”, with an option to expand to four trains in the future. LNG Canada is expected to have a life of at least 40 years.

JGC Fluor BC LNG Joint Venture (JFJV) commenced construction activities in early 2019, as the Engineering, Procurement and Construction (EPC) Contractor. JFJV is also preparing select deliverables for future operations, including development of management plans and acquisition of required permits. Hand-over of site control from JFJV to LNG Canada Development Inc. will occur prior to commencement of operations.

## **1.2. Best Achievable Technology**

LNG Canada is committed to ensuring that processes in place to meet conditions of the IAAC Decision Statement are informed by the best achievable technology (BAT) and based on validated methods and models. Examples include:

- Use of existing infrastructure, such as BC Hydro supplied grid with hydroelectric power output for auxiliary power requirements to ensure the lowest feasible greenhouse gas footprint;
- Shell's Dual-Mixed Refrigerant technology process in combination with high efficiency General Electric aero derivative gas turbines (LMS 100) and recovery of waste heat;
- Use of existing industrial development area for the LNG facility site and refurbishing existing harbour infrastructure where feasible during marine construction;
- Adoption of best-in-class LNG facility simplicity, utilizing the lowest equipment count per LNG capacity;
- Implementation of mitigations and associated sampling programs that prescribe to the most up-to-date standards and methods recognized by government and industry;
- Implementation of an Integrated Engineering Environment for plant design to minimize process safety risks throughout the life of the Project;
- Implementation of a Flawless Project Delivery program, focused on a pro-active approach to mitigate flaws, and help ensure a flawless startup of the plant; and
- Adoption of state-of-the-art design and engineering practices that exceed requirements laid out in legislation.

## **1.3. HSSE, Social Performance and Compliance Principles**

LNG Canada commits to compliance with existing regulations, permits, approvals, authorizations, and related management plan requirements, and to align environmental, community and social performance commitments into engineering design and construction decisions.

## **1.4. Report Requirements**

This IAAC Annual Report provides an overview of the progress on meeting conditions outlined in the IAAC Decision Statement.

As per the IAAC Decision Statement, for the purposes of this report, the reporting year is defined as April 1, 2024 to March 31, 2025.

The LNG Canada IAAC Annual Report can be accessed at the LNG Canada website ([www.lngcanada.ca](http://www.lngcanada.ca)).

### **1.5. Transfer of Ownership**

No transfer of ownership took place during the reporting year.

LNG Canada Development Inc. will notify IAAC no later than 60 days after a transfer of ownership, care, control, or management of the Designated Project as per *IAAC Decision Statement Condition 2.7* and *IAAC Decision Statement Condition 2.8*.

## 2. Project Activities Update

### 2.1. Construction Activities within the Reporting Year

The following sections provide highlights of LNG Canada activities undertaken within the reporting year.

#### 2.1.1. Marine

- Five Tugboats and a floating tug maintenance facility commenced service in Kitimat (refer to photo 1).
- Safety and Fast response boat Uya commenced service in Kitimat (refer to Photo 2).
- LNG Loading Arms tested and functional (refer to Photo 3).
- Imported and offloaded refrigerant to support commissioning activities.
- Installation of in-water infrastructure for the floating LNG Canada tug berth (marine piles, floating pontoons, and a floating breakwater with associated anchors).
- Diving equipment Surface supplied diving module & De-compression Chamber stationed at site.

Further information on the marine program is provided in Section 5.2.1.



PHOTO 1: TUGBOATS AND FLOATING MAINTENANCE FACILITY



**PHOTO 2: FAST RESPONSE CRAFT UYA.**



**PHOTO 3: LNG LOADING MODULE AND ARMS (MARCH 2025)**

### 2.1.2.LNG Facility

- Continued energizing substations.
- Introduced fuel gas into the facility from Coastal GasLink pipeline
- Commenced testing of the gas turbines and acid gas incinerator in LNG Train 1 (Photo 4)
- Completed construction activities at the River Water Intake (refer to Photo 5)
- Completed activities at the LNG Storage Tank in preparation for cooldown (refer to Photo 6)
- Commenced use the flare systems (refer to Photo 7)



**PHOTO 4: LNG FACILITY – VIEW OF THE LNG TRAINS 1 AND 2 TO THE NORTH (MARCH 2025)**



**PHOTO 5: COMPLETED CONSTRUCTION OF THE RIVER WATER INTAKE (NOV 2024)**



**PHOTO 6: LNG TANK CONSTRUCTION COMPLETE, PREPARED FOR COOLDOWN (MARCH 2025)**



**PHOTO 7: ACTIVE FLARE STACKS (MARCH 2025)**

### **2.1.3. General environment activities**

- Water management throughout the LNG Canada site, including installation and management of erosion and sediment controls (ESCs), and management of storm water ponds.
- Wildlife management activities, including wildlife monitoring and assessments, den surveys prior to tree clearing activities, wildlife observation tracking, and installation and effectiveness monitoring of bat boxes.
- Implementation of best management practices for migratory birds including avoidance, work scheduling, bird nest surveys prior to tree clearing activities, and established buffers.
- Management of fish and fish habitat, including fish and amphibian salvage, construction of new offsetting habitats and maintenance of existing offsets.
- Monitoring of adjacent wetland habitats.
- Fish habitat effectiveness monitoring.
- Wetland effectiveness monitoring.
- Continuation of progression of Marbled Murrelet and wetland compensation via conservation.
- Continuation of the Conservation and Recovery Research on Oolichan in Haisla Territory Project

## **2.2. Operation Activities within the Reporting Year**

The “Commissioning” phase, which is defined as “that period of time when Discharge from the LNG facility commences and ending when the first cargo is shipped from LNG Train 1”, commenced on September 1, 2024, and was still ongoing at the end of 2024. On the afternoon of August 31, 2024, fuel gas was introduced into Unit 1000 (Inlet Facilities) for the first time from the Coastal Gas Link (CGL) pipeline, commencing the pressurization of piping and the startup fuel gas heater. The introduction of fuel gas into the fuel gas headers down to the flare area and the first supply of fuel gas to the pilot on the warm/wet flare occurred on September 1, 2024.

Operations, which is defined as “the period of time which follows Commissioning”, did not commence in 2024, as the first cargo had not yet been shipped from LNG Train 1 by the end of 2024.

Other activities to support future operations occurred through the reporting year, which included permitting activities related to air and effluent discharges during operations.

Development of management plans as required under the LNG Canada Environmental Assessment Certificate (EAC) commenced, including required consultation with named regulatory agencies and Indigenous groups.

Additional information is available in Section 3.0.

### **2.3. Implementation Schedule**

The LNG Canada Implementation Schedule outlines the commencement and completion dates for each condition in the IAAC Decision Statement. The Implementation Schedule is publicly available on the LNG Canada website ([www.lngcanada.ca](http://www.lngcanada.ca)).

The most recent IAAC Implementation Schedule was submitted to IAAC and Indigenous groups in May 2023 as the fourth biennial update.

The next IAAC Implementation Schedule is forecast to be submitted to IAAC and Indigenous groups in 2025.

### **2.4. Decommissioning**

No decommissioning activities for the LNG facility took place during the reporting year.

LNG Canada will develop a Decommissioning Plan in consultation with Indigenous Groups that will be submitted to IAAC at least one year prior to the end of operation and at designated intervals during the decommissioning process.

## 3. Environmental Management Program

This section contains further details on how the environmental management program is structured and executed.

The IAAC Decision Statement has specific sections of conditions associated with the following environmental aspects:

- Fish and Fish Habitat (Condition 3), including ESC and vegetation;
- Wetlands (Condition 4);
- Migratory Birds (Condition 5);
- Human Health (Condition 6);
- Current Use of Lands and Resources for Traditional Purposes (Condition 7);
- Physical and Cultural Heritage and Structure, Site, or Thing of Historical, Archaeological, Paleontological, or Archaeological Significant (Condition 8); and
- Accidents and Malfunctions (Condition 10).

Sections 5 to 10 herein provide further detail on each aspect, including associated activities during the reporting year and effectiveness of the mitigation measures / follow up programs.

### 3.1. Environmental Management Plans

#### 3.1.1. Terrestrial

The LNG Canada *Construction Environmental Management Plan* (CEMP) is the overarching framework that encompasses the terrestrial environmental management program and includes all mitigation measures, best management practices, monitoring and reporting requirements associated with each Environmental Management Plan (EMP) developed for construction activities. The CEMP was developed in accordance with the BC EAO EAC and are written to ensure compliance with relevant statutes and regulations and include an adaptive management approach based on continual improvement principles.

The Operations Environmental Management Plan (OEMP) was submitted to the BC Environmental Assessment Office in May 2024, with an update submitted in December 2024 based on their feedback

#### 3.1.2. Marine

The Construction Marine Activities Plan (MAP) is the overarching framework that encompasses the marine environmental management program for construction activities, and includes general marine

mitigation measures, best management practices, and marine environmental monitoring and reporting requirements. The construction MAP was developed in alignment with EAC Condition 17 requirements.

The construction marine program also incorporates supporting marine EMPs including the Marine Access Traffic Management Plan (MATMP) and the Marine Monitoring Plan (MMP).

Development of the marine management plans for operations (required by the EAC) was completed during the reporting year.

Continued consultation took place related to the Marine Mammal Management and Monitoring Plan (MMMMP) and related study, as required under EAC Condition 05. The MMMMP was approved by EAO in October 2024.

Continued development of the Wake Verification program and related management plan development took place during the reporting year, including alignment with consultees on nine wake monitoring locations along the LNG Canada shipping corridor, and deployment of wake monitoring buoys at these locations to commence baseline data collection. The Wake Verification Plan was released for consultation in early 2024 and approved by EAO in November 2024.

During the reporting year, the Operations MAP was also drafted, released for consultation and engagement and was approved by EAO in November 2024.

## **3.2. Mitigation Monitoring and Follow-Up Programs**

LNG Canada is continually re-evaluating mitigation and monitoring measures to ensure that activities comply with regulatory requirements and commitments. There are several tools used to ensure implementation of the mitigation measures outlined in the construction EMPs, as outlined herein.

The outcomes from the mitigation monitoring and follow up programs during the reporting year are contained throughout this annual report, within each relevant environmental aspect.

Processes related to verification of mitigations for operations are under development.

### **3.2.1. Construction Environmental Monitoring Program**

JFJV oversees the implementation of its Environmental Monitor (EM) Program as required for construction and regularly shares information with LNG Canada. JFJV Environmental Specialists perform EM activities for most of the Project, including retaining the services of a Qualified Environmental Professional (QEP) to monitor construction activities and assess the effectiveness of mitigations on an ongoing basis.

EMs inspect environmentally sensitive areas within the Project boundary; visual observations are conducted using the environmental observation report or focus assessments developed for specific

environmental aspects. The observations of both positive findings and deficiencies are communicated for action. An action log is generated by extracting the deficiencies and opportunities for improvement from the database. These items are then tracked to closure and status updated on the action log.

EMs have been given the authority to stop work in cases where mitigations are not sufficient and in cases of non-compliance. EM activities are also undertaken by qualified environmental professionals and contractors.

### **3.2.2. Incident Investigation Program**

Incidents are investigated; the approach and methodology of that investigation is based on the risk of the incident. The investigation may identify if corrective actions or adaptive management of existing mitigation measures is required. Corrective actions and opportunities for improvement identified during incident investigations are assessed and implemented as appropriate. The success of any corrective actions or adaptive management is assessed using a corrective action follow up program, designed to verify the actions are effectively implemented and working.

### **3.3. Records Management**

Records related to the implementation of the Conditions outlined in the LNG Canada *IAAC Decision Statement* are maintained electronically. Records are readily available, and include, but are not limited to, the following:

- Records of mitigation and environmental program monitoring (e.g., surface water sampling results, site inspection results, waste disposal).
- Records of all consultation and notification to regulatory agencies, Indigenous groups, and external stakeholders.

## 4. Social Performance Program

This section contains further details on how the social performance management program is structured and executed.

A range of initiatives are undertaken to ensure the local communities and Indigenous groups receive up-to-date information and have an opportunity to ask questions and provide feedback. These initiatives include stakeholder notifications, advertising, web postings, social media (Facebook), the community feedback process, and in-person meetings.

### 4.1. Internal Workforce Programs

The LNG Canada Cultural Awareness Program is required for all workers and continued to be implemented during the reporting year. The program covers a wide range of topics, including an overview of Indigenous peoples in Canada, a historical timeline, governance structures, First Nations interests in LNG Canada, understanding local Indigenous culture and spirituality, traditional knowledge, stereotypes, and cultural appropriation.

### 4.2. External Programs

Consultation with local governments, agencies, interested residents, and other stakeholders was undertaken during the reporting year as required.

Notification of consultation and public comment periods associated with permit and approval applications were generally provided through local newspaper advertisements, on the LNG Canada and JFJV websites and Facebook pages, required Gazette advertisements, emails and face-to-face communications with key stakeholders, and through other forms of notification to maximize participation and input.

Online tools such as the LNG Canada and JFJV websites and social media platforms are used to communicate information in a timely manner related to construction and project updates to stakeholders and the local community.

LNG Canada holds social management roundtable (SMR) meetings where direct community impacts and mitigations are discussed. Participants include community and provincial stakeholders as well as Indigenous groups. Topics include community health, housing, emergency response, traffic, education, amenities, and waste.

LNG Canada hosts quarterly meetings with local ENGO(s) members where environmental topics of interest are discussed with interested community members. In 2024, LNG Canada hosted 4 of these meetings.

During 2024, LNG Canada commenced a series of external engagements related to “Safe Start up” and “Safe Shipping” to provide interested community members an understanding of what to expect during the future start up of the LNG facility.

In 2024, LNG Canada launched the use of Voyent Alert! App to keep interested Kitimat community members and Haisla Nation members informed of start-up/commissioning and ongoing operational activities, such as flaring. This app was chosen as both the District of Kitimat and Haisla Nation use it to send notifications to their respective residents and members, so there is an existing familiarity. Notifications through this app are offered in addition to social media and website updates. LNG Canada and JFJV Websites

LNG Canada and JFJV have websites ([www.lngcanada.ca](http://www.lngcanada.ca); [www.jfvkitimat.com](http://www.jfvkitimat.com)) that provide information on LNG Canada and the LNG industry.

- JFJV’s website includes construction notifications as well as current employment opportunities with JFJV, and its subcontractors.
- LNG Canada’s website includes information on LNG Canada’s current employment opportunities, contract awards, and upcoming contracting and procurement opportunities, and environmental programs, including but not limited to, the IAAC Implementation Plan, Wetland Compensation Plan, Fish Habitat Management Plan, and the Archeological and Heritage Resources Management Plan. The IAAC Annual Report and any supporting documentation is also accessible via the LNG Canada website.

#### **4.2.1. Community Feedback Process**

The Community Feedback Process provides an open and transparent means for the community to raise questions and have them addressed in a timely and consistent manner. LNG Canada launched their Community Feedback Mechanism in Q1 2024 and operated with 24/7 coverage for the remainder of 2024. Working closely together, JFJV and LNG Canada share information, responses, complaints, and concerns with each other to ensure the appropriate organization responds to each inquiry.

Community feedback and grievances can be provided to either organization in a variety of ways, including via telephone, digitally by email or a website form, mail, or in person. JFJV closed its Project Resource Centre in the Kitimat City Centre Mall in December 2024. However, their External Affairs team remained active in the community and continued to provide ongoing updates through JFJV’s website and Facebook page as well as maintained their community feedback channels.

The Community Feedback Process has been communicated to key stakeholders, including the District of Kitimat, City of Terrace, Haisla Nation and other local Indigenous groups through various

meetings and communications. There have also been radio, newspaper, direct mail and online campaigns promoting the Community Feedback Process to the broader community.

LNG Canada's response standards for community feedback are 2 business days (or sooner) for acknowledgement, 7 business days for updates and the goal to resolve all community feedback submissions within 10 business days. All feedback is tracked and responded to via the Community Feedback Process utilizing subject matter experts where applicable.

#### **4.2.2. Aboriginal Consultation Plan**

LNG Canada continues to implement the BC EAO approved Aboriginal Consultation Plan (August 2013), which describes the processes and various methods used to engage and consult with Indigenous groups throughout the environmental assessment, including ongoing engagement post-EAC.

Methods of engagement used to-date include, but are not limited to, face-to-face meetings, e-mails, phone calls, letters, community meetings, site visits, quarterly project update meetings, and other methods that may be preferred or requested by individual Indigenous groups through the consultation process. Each of these engagement tools provides an opportunity for ongoing information sharing and feedback.

LNG Canada will continue to implement the EAO approved LNG Canada Aboriginal Consultation Plan for all phases of the Project. The next Aboriginal Consultation Summary Report is due one year after the commencement of Operations.

### **4.3 Indigenous Group Consultation Programs**

LNG Canada continues to engage in consultation with Indigenous groups regarding Project activities that may potentially impact Indigenous rights and interests. In addition, LNG Canada continues to undertake a range of initiatives to ensure that Indigenous groups receive up-to-date information about LNG Canada and have an opportunity to ask questions and provide feedback.

#### **4.3.1 Participation Opportunities**

In addition to formal Indigenous group consultation as outlined in the Aboriginal Consultation Plan, LNG Canada also offers numerous opportunities for Indigenous groups to participate in the implementation of field environmental monitoring programs by participating in monitoring activities at site. Throughout the reporting year, representation of the Haisla Nation participated in various monitoring activities at site, including fish and amphibian salvage, and water quality sampling.

LNG Canada will continue to identify and provide opportunities for Indigenous group members to participate in various monitoring activities (outlined in the EMPs) occurring in their respective traditional territory.

#### **4.3.2 Regular Project Updates**

During the reporting year, ongoing formal and informal engagements with Indigenous groups were undertaken. These included, but are not limited to, ongoing meetings with Haisla Nation and other local Indigenous groups related to permitting, business opportunities, and employment:

- Bi-weekly permitting and compliance update meetings with Haisla Nation. Topics discussed in these meetings include:
  - construction and overall project updates
  - upcoming permit applications that will require specific engagement with Haisla Nation
  - feedback on permit applications shared with Haisla Nation for review
  - discussion of compliance events that have been self-disclosed to Haisla Nation
- Joint meetings and site tours with Haisla Nation and the regulators are also held as required as part of the permitting process (i.e., waste discharge authorizations).
- Consultation and engagement activities also took place as part of the permitting process for the waste discharge authorizations with Gitga'at First Nation, Gitxaala Nation, Kitsumkalum Indian Band, and Kitselas First Nation, and were offered to Metlakatla First Nation and Lax Kw'alaams Band. The Metis Nation of BC is also engaged for specific EMPs, when named in the EAC condition.
- Permitting updates were offered to Indigenous groups at various points throughout the year and provided as requested.
- JFJV provided Indigenous groups an Employment Opportunities Matrix in October 2024.
- LNG Canada met with various Indigenous groups throughout the reporting period to provide updates on Operations related employment and workforce development opportunities and will continue to discuss these opportunities on a regular basis. LNG Canada workforce development also participates in local and regional youth trade camps/explorer programs to share career pathways and workforce development opportunities.
- LNG Canada shared its quarterly Procurement Opportunities Notice (outlining upcoming contracting and procurement opportunities) with Indigenous groups quarterly throughout

2024 with the final one sent December 12, 2024. LNG Canada and continues to meet with Indigenous Groups as requested to discuss further.

- Over 3 consecutive weekends in April 2024, LNG Canada hosted for Kitimat residents and Haisla Nation members “Safe Shipping Presentations followed by site tours in Kitimat (April 6-7; & 13-14) and Kitamaat Village (April 20 – 21). There were 550 people who attended these presentations / site tours.
- From April – June 2024, LNG Canada hosted students (Grade 6 – 12) from schools within Kitimat and Kitamaat Village and share an age appropriate “Safe Start-up Presentation” followed by a site tour. There were 110 students and teachers who attended these presentations / site tours.
- From January - June 2024, LNG Canada hosted 27 Safe Start-up Presentations and site tours with existing community groups within Kitimat. There were 750 people who attended these presentations / site tours.
- LNG Canada hosted “Safe Start-up” Open Houses in Kitamaat Village and Kitimat in May 2024, which included dedicated booths to communicate information and answer questions relating to construction progress, air emissions, effluent discharge, environmental offset projects, emergency response, safe shipping, maintenance and operations, employment, workforce development, contracting and procurement opportunities, and LNGC Community Feedback Process,
- In September, LNG Canada hosted Safe Shipping Workshops in Kitimat and Prince Rupert, which included information booths and presentations. In addition to LNG Canada, representatives from Transport Canada, Pacific Pilotage Authority, Canadian Coast Guard and Western Canadian Spill Response Corporation participated with information booths and presentations.
- Following LNG Canada’s starting its commissioning activities in September, LNG Canada met with existing community groups to re-visit its Safe Start-up Presentation and answer questions / concerns specific to the commissioning activities underway. LNG Canada hosted 10 sessions and 221 people who attended.
- In December, LNG hosted an information session for Haisla Nation members that included Safe Shipping and Safe Start-up update Presentations.
- LNG Canada held numerous site tours for members of Haisla Nation, Gitga’at First Nation, Kitsumkalum Indian Band, and Kitselas First Nation throughout the reporting period, whereby specific Project scopes were also discussed.

- LNG Canada met with Gitga'at First Nation monthly to provide marine related environmental and permitting updates.
- During regular project update meetings, LNG Canada provided Project construction and health and safety updates.

### **4.3. Environmental Management Plan Consultation**

LNG Canada continues to engage with regulatory agencies and Indigenous groups and provide updates on the development and implementation of management plans, through information sharing and formal reporting processes. The CEMP, MAP, and supporting EMPs for construction are reviewed and revised as appropriate as part of the adaptive management approach.

The Wildlife Management Plan was updated during the reporting year.

EMPs required for Operations were under development during the reporting year, which included consultation and engagement activities (as outlined in Section 3 herein).

### **4.4. Regional Participation and Cooperation**

LNG Canada is committed to participating in regional initiatives related to several topics as opportunities become available. During the reporting year, initiatives have included:

- Continued participation in the “Gitga'at-Gitxaala-Transport Canada Proactive Vessel Management Forum” under the umbrella of the Oceans Protection Plan
- Continued participation and support for development of further updates to the North Coast Waterway Management Guidelines
- Continued participation in the Kitimat Airshed Group

## 5. Fish and Fish Habitat

The landscape surrounding the LNG Canada site contains a range of terrestrial, aquatic and wetland habitats that support populations of wildlife and fish. These ecosystems are important not only to the health of the natural landscape, but also to residents who rely on the environment for recreation and traditional use.

Several plans have been developed in consultation with regulatory agencies and potentially affected Indigenous groups to mitigate any impacts to fish and fish habitat.

The LNG Canada *Surface Water Quality Management Plan (Construction)* outlines mitigation measures pertaining to water quality and aquatic habitat that are implemented during construction. At a minimum, LNG Canada will:

- Minimize disturbed areas and stripping of vegetation and soils, where practicable, and maintain as much of the natural vegetation cover as possible.
- Install erosion controls to prevent erosion and install detention ponds and other runoff management controls to prevent sediment migration to surface water bodies.
- Ensure all discharges from the construction site meet regulatory requirements, including the *Canadian Council of Ministers of the Environment (CCME) Water Quality Guidelines for the Protection of Aquatic Life* and the *BC Approved Water Quality Guidelines*.
- Ensure all construction equipment is mechanically sound to avoid leaks of oil, gasoline, hydraulic fluids, grease, and other substances.
- Ensure all diversions of water from excavations are controlled, and that they do not enter watercourses unless testing is completed, and all surface water criteria are met.

Mitigation of impacts to fish and fish habitat are routinely considered during the design and construction. The RWI structure has incorporated several design features to ensure the protection of fish, including but not limited to the use of fish screens. During the reporting year, the methodology for assessing the screens effectiveness was developed and shared with Haisla Nation (to reduce the potential for entrainment and/or impingement of small fish during operational water withdrawals).

The following section outlines further details related to the mitigation of impacts to fish and fish habitat.

### 5.1. Fisheries Act Authorization Overview

LNG Canada holds four authorizations under the Fisheries Act; three for freshwater (known as “FAA1”, “FAA2”, and “FAA3”); and one for the marine environment; issued by Fisheries and Oceans Canada (DFO).

In consultation with DFO, the BC Ministry of Forests (FOR), and affected Indigenous groups, Habitat Offsetting Plans were developed and implemented as outlined in the associated FAAs. All offset construction is now completed under the LNG Canada FAAs, and habitat effectiveness monitoring is ongoing, and reports are provided to DFO as required in the permits.

### 5.1.1.FAA1 – Workforce Accommodation Centre

Fisheries Act Authorization 15-HPAC-00918 for the Workforce Accommodation Centre (“FAA1”) provided LNG Canada with authorization to construct Cedar Valley Lodge (CVL), which included infilling of Beaver Creek wetland and off-channel watercourse habitats and clearing of riparian vegetation in and around said habitats.

#### 5.1.1.1. Effectiveness Monitoring

2024 was the seventh of ten years of monitoring for five offset habitats (West Channel, North Channel, Pond 1, Pond 4, and East Channel) and the first year of monitoring for one offset habitat (Sumgas Restored) constructed under 15 HPAC 00918 for the workforce accommodation centre. A summary of the 2024 effectiveness monitoring for the FAA1 offsets can be found in Table 1.

**TABLE 1: SUMMARY OF 2024 FAA1 OFFSET HABITAT SUCCESS CRITERIA**

Component	Measurable Parameter	West Channel	North Channel	Pond 1	Pond 4	East Channel	Sumgas
Physical Stability and Hydraulic Connectivity	Bank Stability	✓	✓	✓	✓	✓	✓
	LWD – % functional	✓	✓	✓	✓	✓	✓
	Connectivity to mainstem habitats	N/A	N/A	N/A	N/A	N/A	N/A
	Water depth	N/A	N/A	N/A	N/A	N/A	N/A
Vegetation Monitoring	Riparian vegetation establishment: shrubs and trees	✓	✓	✓	✓	✓	✓
	Riparian vegetation function	✓	✓	✓	✓	✓	✓
Water Quality	Temperature <sup>1</sup>	✓	✓	✗	✓	✗	✗
	Dissolved Oxygen	✓	✓	✓	✗	✗	✗
	pH	✓	✓	✓	✓	✓	✗
Fish Utilization	Density (summer)	✗	✗	✓	✓	✓	N/A
	Relative abundance (summer)	✓	✗	✓	✓	✓	✓
	Fish presence (winter)	N/A (✓)	N/A (✓)	✓	✗	✗	✓
	Length frequency (summer)	✗	✗	✗	✗	✗	✓
	Spawner presence	N/A	N/A	N/A	N/A	N/A	✓

Note:

<sup>1</sup> Temperature success was assessed using BC ENV (2024a) guidelines for optimum rearing temperature for salmonids.

### 5.1.2.FAA2 – LNG Facility

Fisheries Act Authorization 16-HPAC-00220 for the LNG Facility (“FAA2”) provided LNG Canada with authorization to construct the LNG facility, which included the diversion of Beaver Creek, Anderson Creek and Kitimat River Side Channel (KRSC).

#### 5.1.2.1. Effectiveness Monitoring

Effectiveness monitoring for the reporting year consisted of Anderson Creek, Anderson Creek Fishway, Anderson Creek Side Channel, Beaver Creek Realignment, KRSC South, Kitimat Estuary Ponds and Channels, Kitimat Estuary Enhancement Area, Moore Creek Dyke Breach and the Minette Bay Salt Marsh Restoration. A summary of the 2024 effectiveness monitoring for the FAA2 offsets can be found in 2.

**TABLE 2: SUMMARY OF 2024 FAA2 OFFSET HABITAT SUCCESS CRITERIA**

Component	Measurable Parameter	WACP3	ACFW <sup>1</sup>	KRSCNR	KRSCSE	KEPC	KEEA
Physical Stability and Hydraulic Connectivity	Channel/Bank Stability	✓	n/a	✓	✓	✓	✓
	LWD-% functional	✓	n/a	✓	✓	✓	✓
	Connectivity to mainstem habitats	n/a	n/a	n/a	n/a	n/a	n/a
	Water depth	n/a	n/a	n/a	n/a	n/a	n/a
	Spawning habitat	n/a	n/a	✘	n/a	n/a	n/a
	Pool depth	n/a	n/a	✓	✓	n/a	n/a
Riparian Vegetation Establishment and Function	Tree and Shrub Establishment	✘	n/a	✘	✘	✘ <sup>2</sup>	n/a
	Vegetation Function as Fish Habitat	✓	n/a	✓	✓	✓ <sup>2</sup>	n/a
Water Quality	Temperature <sup>3</sup>	✘	✓	✓	✓✘ <sup>4</sup>	✘	✘
	Dissolved oxygen	✓	✓	✓	✓✘ <sup>4</sup>	✓	✓
	pH	✓	✓	✓	✓✘ <sup>4</sup>	✓	✓
Fish Utilization	Density (summer)	✘	n/a	✓	✓✘ <sup>4</sup>	✓✘ <sup>4</sup>	✓
	Relative abundance (summer)	✓	n/a	✓	✓	✓	✓
	Fish presence (winter)	✘	✓	✓✘ <sup>4</sup>	✓	✓✘ <sup>4</sup>	✘
	Length-frequency (summer)	✘	n/a	✘	✓✘ <sup>4</sup>	✘	✓
	Spawner escapement	n/a	✓	✘	✘	n/a	n/a

Notes:

<sup>1</sup> ACFW is in an off-year for monitoring, at the request of LNG Canada fish presence investigations were completed.

<sup>2</sup> Due to the estuarine marsh/meadow community vegetation structure of KEPC, herbaceous vegetation is expected to dominate with relatively low tree and shrub cover.

<sup>3</sup> Temperatures were compared to the BC Water Quality Guideline for coho salmon rearing temperature (BC ENV 2024a).

<sup>4</sup> Some habitats within this site met the success criteria, while others did not.

### 5.1.3.FAA3 – Supporting Infrastructure

Fisheries Act Authorization 16-HPAC-01079 for Supporting Infrastructure (“FAA3”) provided LNG Canada with authorization to construct supporting infrastructure for the LNG Facility such as the

loading line. FAA3 includes the diversion of off channel habitat of Moore Creek and destruction of off channel habitat.

#### **5.1.3.1. Effectiveness Monitoring**

2024 was a non effectiveness monitoring year for the offset that consists of Moore Creek Side Channel, and Workforce Accommodation Centre (WAC) CVL Pond 2. Effectiveness monitoring will resume in 2025.

#### **5.1.4. FAA – Marine**

Fisheries Act Authorization 15-HPAC-00585 for Marine (“FAA Marine”) provided LNG Canada with authorization to construct LNG carrier berths, early offloading facility, and material offloading facility (MOF), which will include the infilling of intertidal and subtidal habitat, dredging of intertidal and subtidal habitats, clearing of riparian vegetation and installation of sheet and pipe piles.

#### **5.1.4.1. Effectiveness Monitoring**

2024 was a non effectiveness monitoring year for the offset that consists of both salt marsh habitats and the areas of salt marsh restoration. Effectiveness monitoring will resume in 2025.

### **5.2. Marine Program**

#### **5.2.1. In-Water Construction Activities**

The Marine EMPs address environmental mitigations and monitoring requirements for marine in-water construction, including but not limited to mitigations related to water quality, sediment quality, underwater acoustics, and marine mammal observation and management.

Prior to the start of in-water construction activities, LNG Canada established the location and timing of sensitive life stages and habitat occupancy for fish, including marine mammals, in consultation with DFO and Indigenous groups through the FAA permitting processes.

Prior to and during marine in-water construction, a robust field environmental monitoring program was implemented to ensure compliance with water quality guidelines and to prevent incidents related to marine mammals. The monitoring programs implemented during the reporting year are outlined in the approved MMP and are summarized below.

Effectiveness of timing window implementation is undertaken as part of the LNG Canada EM program and related assurance activities, in particular support of qualified professionals during in-water works

to ensure that species present are predicted, and risk is managed. The priority is to make all reasonable efforts to complete the works in the specified timing windows established. If in-water works must occur outside such timing windows, the Proponent works with DFO and Indigenous groups to determine any additional mitigation measures required to complete such works.

#### **5.2.1.1. Marine Construction Activities**

In-water construction works were limited to the installation of the twined pipeline for the marine outfall, underwater welding works conducted by divers, demolition of legacy marine structures associated with a non-operational trestle, and the installation of in-water infrastructure for the floating LNG Canada tug berth (floating operations and maintenance facility).

On land at Berth 2, the loading module was placed on its foundation, the trestle pipe racks were set in place from the LNG facility to the loading module, and there were 20 pipe piles installed on land at Berth 2. Based on the proximity of piling to the Quay wall, a bubble curtain was implemented along the Quay wall, with a marine mammal observer and hydroacoustic monitoring conducted. On land at the tug berth, civil and mechanical, electrical, and instrumentation works were conducted to provide utilities to the tug berth.

#### **5.2.2. Water Quality**

Water quality is monitored during marine construction-related activities to ensure compliance with BC Approved Water Quality Guidelines as outlined in the MMP. Waste Discharge Authorizations, issued by the BC Energy Regulator, are in place for the management of discharges from marine construction.

#### **5.2.3. Marine Mammals**

No in water piling occurred in the reporting year. When piling previously occurred during construction LNG Canada employed low sound methodologies such as vibratory piling wherever feasible. In instances where the use of low sound vibratory piling was not feasible, use of bubble curtains was implemented. The LNG Canada MMP defines the monitoring and mitigation measures related to marine mammal protection and establishes a monitoring program, overseen by a QEP, that includes the deployment of qualified Marine Mammal Observers (MMO) at strategic locations at the Project site.

Experienced QEPs were employed as full-time MMOs to monitor during in water activities, both during the day and at night. Qualified MMOs can identify marine mammal species possibly encountered in the Project area, accurately describe relevant behaviour of marine mammals, and accurately estimate the location of the individual in relation to any marine mammal exclusion zone (MMEZ) boundaries.

The number and location of MMOs, as well as the applied mitigative measures to be taken, is dependent on the activity being undertaken (i.e., pile driving, MOF construction, dredging, etc.).

If a marine mammal was observed within the MMEZ, the MMO assessed the behaviour, location, and direction of travel of the animal if it was moving towards Project activity. The MMO also notified operators to limit non-essential movement of auxiliary vessels, reduce speed to no-wake speed, and avoid the path of the sighted animal(s). Work only resumed once the animal was observed leaving the immediate area or was not re-sighted for 30 minutes.

MMOs monitored the project boundaries as defined in the MMP, as well as in water works adjacent to the Project site. Marine mammal observations were conducted with the naked eye, with the assistance of binoculars during daytime observations, and with Forward-Looking Infrared (Radar) technology for nighttime observations.

In instances where vibratory pile-driving occurred, a near-field over-pressurization hydrophone was placed within 10 meters of the activity to ensure pressures do not exceed 30 kilopascals. Additionally, far field instruments monitor underwater levels prior to, during and after impact pile driving activities. The MMO program supports effectiveness monitoring by documenting all marine mammal sightings and related work stops. Any change in behavior was also noted by the qualified MMOs.

The MMEZ boundaries for the reporting year were defined as 1.9 kilometers for activities that produce underwater noise that exceeds 160 dB respective of cetaceans and 150 meters for activities that produce underwater noise that exceeds 180 dB respective of pinnipeds. No work stoppages occurred in the reporting year due to marine mammal presence within the MMEZ. Additionally, no marine mammal incidents occurred within the reporting year as no in water piling occurred.

Effectiveness monitoring was undertaken historically for underwater noise through the field environmental monitoring program as outlined in the MMP, including collection and analysis of noise and pressure readings during any in water impact piling activities. Observations related to impacts on fish are also made through the LNG Canada EM program and related assurance activities.

### **5.3. Freshwater Fish and Amphibian Program**

During construction activities, LNG Canada is committed to avoiding and mitigating impacts to fish and fish habitat. The LNG Canada *Sediment and Erosion Control Plan*, *Fish Habitat Management Plan*, and Fisheries Act Authorizations outline requirements to protect freshwater fish habitat at the Project site during construction. Refer to Section 5.1 for further details in FAA1, FAA2, and FAA3.

#### **5.3.1. Fish Salvage and Relocation**

During the reporting year, fish salvage and relocation occurred during maintenance and improvement works in the Anderson Creek Realignment Channel. During the reporting year an approximate total of 36,631 fish were salvaged from Anderson Creek and side channel. Fish species varied depending on the habitat types salvaged and included salmonids and stickleback. Under the direction of fisheries

QEP, all salvaged fish were released into habitat of a similar type and quality. Most of the fish salvage efforts occurred during the summer of 2024. The fish salvage efforts are expected to reduce greatly in the next reporting year as the site preparation, creek diversions and habitat off setting have been completed. During the next reporting year, areas where there is a potential for fish salvage have been identified as Anderson Creek realignment channel for annual operational maintenance.

Most of the fish salvage efforts occurred during the summer and fall of 2024. The fish salvage efforts are expected to reduce greatly in the next reporting year as the site preparation, creek diversions and habitat off setting have been completed. During the next reporting year, areas where there is a potential for fish salvage have been identified as Anderson Creek realignment channel for maintenance activities.

### **5.3.2. Amphibian Salvage and Relocation**

During the reporting year, amphibian salvage and relocation occurred in the later summer and early fall as amphibian migrations occurred. Approximately 935 amphibians were salvaged, which included Western Toads, Long-toed Salamanders, and Northwestern Salamanders. All salvaged amphibians were released into habitat of a similar type and quality. Due to the close relationship amphibian salvage has with fish salvage activities, it is expected that amphibian salvage in 2025 continue to decrease year over year.

### **5.3.3. Supporting Activities (Construction)**

#### **5.3.3.1. Erosion and Sediment Control**

ESCs are implemented to isolate construction activities from adjacent freshwater fish habitat and protect surrounding vegetation, as well as to reduce soil erosion from raindrop impact and surface runoff of stormwater. A variety of erosion control techniques are implemented as needed, including, but not limited to, silt fencing, straw wattles, riprap, geosynthetics, seeding, ditching, and contouring. Effectiveness of the implementation of ESC measures are regularly monitored and adjusted in the field as needed.

To verify the ESC mitigations are effective and in working order, the following assurance activities are undertaken as part of the EM Program (refer to Section 3.2.1):

- Daily water quality monitoring by Environmental Specialists downstream of the construction activities to ensure that turbid water is not impacting aquatic habitat;
- Daily ESC inspections conducted by applicable subcontractors;
- Regular focus inspections conducted by JFJV Environmental Specialists; and
- Weekly joint assurance walks conducted with LNG Canada, JFJV, and contractors.

As the ground disturbance activities have declined since 2022, the ESC activities in the reporting year were focused more on road surfaces and the stability from re-vegetation around waterbodies and the permanent soil stockpile. Stormwater management and erosion control structures, including ditches, ponds, and fencing along the north and south haul roads were effectively maintained and, therefore, consistently performed as intended.

LNG Canada continues to implement ESC best practice and standard methods during all phases of the project. Lessons learned and adaptive management is applied as required to ensure effective functioning of controls.

#### **5.3.3.2. Vegetation Management**

The LNG Canada *Vegetation Management Plan* outlines mitigation measures pertaining to red and blue-listed plants and communities. Activities undertaken in the reporting year did not impact red and blue-listed plants and communities.

No opening burning of vegetation occurred during the reporting year.

LNG Canada revegetates disturbed riparian areas as soon as practicable after construction, in consideration to several factors including weather, Project construction schedule, and activity sequencing.

## 6. Wetlands

LNG Canada is committed to mitigating adverse effects on wetland functions that support migratory birds, species at risk, or the current use of lands and resources for traditional purposes by Indigenous groups. In BC, wetlands designated as ecologically important to a region are defined by Environment and Climate Change Canada as the following:

- Provincially red – (threatened or endangered) and blue-listed (of special concern) wetland ecological communities
- Estuaries, as identified by the Pacific Estuary Conservation Program
- Areas of continental or regional significance to waterfowl within the Habitat Joint Venture planning boundaries of BC (e.g., estuaries in the Pacific Coast Joint Venture delivery area)
- All eelgrass (*Zostera* subspecies) beds

Approximately 49 hectares of ecologically important wetlands occur within the Project footprint. Five wetland classes (estuarine, fen, marsh, swamp, and open shallow water) are represented, including red-listed and blue-listed wetlands (eelgrass beds are addressed within the DFO FAA Marine for intertidal habitats).

Compensation is considered the third element of the mitigation hierarchy, following avoidance and minimization of adverse effects. Complete avoidance of wetlands is the preferred alternative when wetlands are designated as ecologically or socio-economically important to a region. Due to the extent of wetlands in the Project footprint, feasible alternatives to completely avoid wetlands could not be identified.

### 6.1. Wetland Protection Mitigations

LNG Canada commits to mitigation measures to minimize and manage adverse effects on wetlands with the Project footprint and adjacent to it. These mitigations include, but are not limited to:

- Maintenance of hydrology during construction activities to the extent practicable
- Maintenance of wildlife passage during construction activities by limiting fencing, phasing construction activities, and maintaining riparian vegetation where practicable
- Installation of collector ditches to divert surface water from the construction area to sedimentation ponds prior to release
- Design to maintain tidal flow through the LNG loading line using raised infrastructure and breaks, which also allow stream and surface flow to continue

- Delineation of clearing boundaries prior to site preparation to keep clearing activities within the designated Project footprint
- Reclamation of temporary workspace as soon as practicable
- Implementation of the LNG Canada *Sediment and Erosion Control Plan* to manage surface water and avoid sedimentation to adjacent vegetated areas or wetlands
- Implementation of the LNG Canada *Invasive Plant Management Plan* to manage invasive plants
- Implementation of the LNG Canada *Surface Water Management Plan* to address stormwater collection, treatment, and disposal during construction
- Development and implementation of the LNG Canada *Wetland Compensation Plan* to address loss of wetland habitat function

Construction activities undertaken in the reporting year were minimal, and all activities undertaken adhered to the applicable mitigations listed above.

Prior to undertaking any clearing activities, clearing boundaries are delineated based on “Issued for Construction” drawings. All boundaries are flagged, and verification of clearing boundaries is completed by walking the perimeter of the flagged area prior to commencement of work. During clearing activities, construction crews are actively monitoring to ensure that delineated boundaries are adhered to and that any vegetated buffer zones are maintained.

All areas disturbed to create temporary workspace are reclaimed as soon as practicable. ESCs are installed prior to construction activities that could result in migration of sediment to adjacent vegetation or surface water bodies. Detailed information on mitigations related to ESC is available in Section 5.3.3.1 of this report.

Within the reporting year, LNG Canada completed the annual adjacent wetland assessment, and no adverse effects to adjacent wetlands resulting from construction were identified.

## **6.2. Wetland Compensation Plan**

The LNG Canada Wetland Compensation Plan, developed in accordance with the EAC and the IAAC Decision Statement, defines the actions LNG Canada will take to provide compensatory wetlands at a minimum 2:1 ratio.

The objective of the Wetland Compensation Plan is to implement wetland compensation measures as close to Kitimat as possible with wetlands that reflect a similar wetland type and functions to those that are lost. If reasonable and practical options for restoration, enhancement, and/or creation of

wetlands are not available locally within the Kitimat Valley area, then localized land conservation opportunities will be planned.

The most recent revision of the Wetland Compensation Plan was shared with Indigenous groups and pertinent regulatory agencies in June 2020; and is available on the LNG Canada external webpage.

No additional updates took place during the reporting year.

### **6.2.1. Implementation and Effectiveness Monitoring**

The Wetland Compensation Plan will be implemented iteratively per the surveyed areas of wetlands identified for compensation within five years of the start of construction (November 15, 2020). Wetland monitoring has been conducted prior to and during construction to detect potential unanticipated loss of wetland functions on site and adjacent to the project footprint. Where any unanticipated loss of function occurs, additional mitigation measures will be developed and applied. Where unanticipated residual losses occur in ecologically important wetlands, these areas will be compensated for in a similar manner as the compensation for the lost wetland functions outlined in the Wetland Compensation Plan.

All the compensation wetlands were constructed and operational in 2021 (refer to Figure 3). These habitats are components of the fisheries offsetting program around the project site and off lease; WAC (CVL) Ponds 1, 2, 3, 4 and the East Channel, Anderson Creek off-channel ponds, Anderson Creek Side Channel ponds, KRSC North & South ponds, Estuary ponds, Minette Bay salt marshes and large woody debris removal area, Moore Creek Side Channel, Moore Creek Dyke Breach and Beaver Creek off-channel ponds.

Approximately 24 ha of additional offsetting will be done through wetland protection. Efforts to secure land required for compensation continued in the reporting year.

LNG Canada has developed an effectiveness monitoring program to ensure that wetland compensation measures are fulfilling the functions of the wetlands they are replacing, which includes the following:

- Compliance monitoring to ensure compensatory habitats are constructed or protected in accordance with the Wetland Compensation Plan
- Effectiveness monitoring to ensure that restored, enhanced, and/or created wetlands are functioning as intended after construction and/or all protected wetland habitats and conservation buffers continue to function as predicted
- Adaptive management actions to promote long term performance of habitat

Monitoring will occur in year one, and in years three, five, and ten after compensation at the sites is completed.

Within the reporting year various wetland habitats underwent effectiveness monitoring. In summary, no major management issues were observed during the 2024 surveys. However, the relatively low vegetation cover with the Salt Marshes was investigated and remedial measures have been identified. The implementation of remedial measures will begin in 2025. Additionally, there was a recommendation to consider noxious weed removal at two sites (WAC Pond1 and Minette Bay Saltmarsh Restoration LWD Removal Area). A summary of the 2024 wetland effectiveness monitoring can be found in Table 4. Subsequent years' monitoring will continue to assess the wetlands' hydrologic, biogeochemical, and habitat functions and associated reporting will be able to include observable trends in the results.

**TABLE 2: SUMMARY OF 2024 WETLAND SUCCESS CRITERIA**

Wetland Compensation Site (Monitoring Year)	Success Criteria							Comments
	Physical Stability	Hydrological Functions	Biogeochemical Functions - Water Quality	Biogeochemical Functions – Carbon Capture and Storage	Native Vegetation Cover	Invasive Plant Species Cover	Wildlife Habitat Functions	
WAC Pond 3 (Year 5)	Yes	NA <sup>a</sup>	Yes	No	No	Yes	Yes	<ul style="list-style-type: none"> <li>Total average vegetation cover decreased in Year 5 (2024)</li> <li>Native vegetation cover decreased from Year 3 (2022) to Year 5 (2024)</li> </ul>
Estuary Channels (Year 3)	Yes	NA <sup>b</sup>	No	Yes	Yes	No	Yes	<ul style="list-style-type: none"> <li>Year 3 (2024) water quality data extended outside the CCME guidelines for pH</li> <li>One of the dominant species within the transects is a noxious weed; invasive species cover increased from Year 1 (2022) to Year 3 (2024)</li> </ul>

Wetland Compensation Site (Monitoring Year)	Success Criteria							Comments
	Physical Stability	Hydrological Functions	Biogeochemical Functions - Water Quality	Biogeochemical Functions – Carbon Capture and Storage	Native Vegetation Cover	Invasive Plant Species Cover	Wildlife Habitat Functions	
Estuary Enhancement (East) (Year 3)	Yes	NA <sup>b</sup>	No	Yes	No	No	Yes	<ul style="list-style-type: none"> <li>Year 3 (2024) water quality data was outside the CCME guidelines for pH</li> <li>Native vegetation cover decreased from Year 1 (2022) to Year 3 (2024)</li> <li>One of the dominant species within the transects is a noxious weed; invasive species cover increased from Year 1 (2022) to Year 3 (2024)</li> </ul>
Estuary Enhancement (West) (Year 3)	Yes	NA <sup>b</sup>	Yes	No	No	Yes	Yes	<ul style="list-style-type: none"> <li>Total average vegetation cover decreased in Year 3 (2024)</li> <li>Native vegetation cover decreased from Year 1 (2022) to Year 3 (2024)</li> </ul>

Wetland Compensation Site (Monitoring Year)	Success Criteria							Comments
	Physical Stability	Hydrological Functions	Biogeochemical Functions - Water Quality	Biogeochemical Functions – Carbon Capture and Storage	Native Vegetation Cover	Invasive Plant Species Cover	Wildlife Habitat Functions	
Kitimat River Side Channel – Northern Realignment (Year 5)	Yes	NA <sup>a</sup>	No	Yes	Yes	No	Yes	<ul style="list-style-type: none"> <li>Year 5 (2024) water quality data was outside the CCME guidelines for pH</li> <li>Invasive species cover increased from Year 3 (2022) to Year 5 (2024)</li> </ul>
Kitimat River Side Channel – Southern Extension (Year 3)	Yes	NA <sup>a</sup>	No	No	No	No	Yes	<ul style="list-style-type: none"> <li>Year 5 (2024) water quality data was outside the CCME guidelines for pH</li> <li>Total average vegetation cover decreased in Year 3 (2024)</li> <li>Invasive species cover increased from Year 1 (2022) to Year 3 (2024)</li> </ul>

Notes:

Yes = success criteria have been met for a given category and site in 2024

No = success criteria have not been met for a given category and site in 2024

NA = success criteria not applicable for 2024

See Section 4.0 of this report for success criteria

<sup>a</sup> The success criterion for water depth is not applicable as drought conditions were experienced in the Skeena-Nass region in 2024.

<sup>b</sup> Water depth monitoring is not conducted at this location.

## 7. Migratory Birds

LNG Canada is committed to implementing the Project in a manner that protects wildlife, including migratory birds and their habitat. Mitigations to support this commitment are outlined in the LNG Canada *Wildlife Management Plan (Construction)* and the LNG Canada *Raptor Management Plan*. The *Environment Canada Avoidance Guidelines* to reduce the risk of incidental take of migratory birds, nests, and eggs was considered in the development of these plans and continues to be considered during execution of construction activities.

QEPs, including an Avian Biologist as required, are on site or available during construction activities to support and provide guidance on avoiding harm. Mitigations to avoid impact to migratory birds include, but are not limited to, the following:

- Reduction of light and noise pollution where feasible
- Adherence to timing and restricted activity window requirements, including bird breeding periods and species at risk periods
- Adherence to provincial and federal setback distances for migratory bird and raptor nests

Annually between March 25<sup>th</sup> through August 17<sup>th</sup>, mitigations are implemented to reduce impact to migratory bird breeding and nesting habits. From January 1<sup>st</sup> through September 5<sup>th</sup> annually, mitigations to avoid impact to breeding and nesting raptors are implemented.

During the reporting year, 51 pre-disturbance bird nest surveys were completed. Across the Project site, 36 active nests were identified through a mix of pre-disturbance bird nest surveys and environmental monitor identification on various Project infrastructure.

During the reporting year, the *Wildlife Management Plan (Operations)* was developed and shared with regulators and Indigenous groups named in the EAC; and included the mitigations from the Decision Statement related to flaring and operational lighting.

### 7.1. Marbled Murrelet

During the reporting year, no potential high and moderate marbled murrelet habitat was removed, as this was completed in a previous reporting year, outside of the marbled murrelet breeding period. LNG Canada does not anticipate any further clearing of old growth forest within the potential marbled murrelet habitat.

## 8. Human Health

LNG Canada is committed to reduction of noise and air emissions during Project activities and takes steps to implement mitigations as appropriate.

LNG Canada applies best management practices for construction noise from the *British Columbia Noise Control Best Practices Guidelines* (issued by the BC Energy Regulator). Best management practices are documented in the *Noise Management Plan (Construction)*. During the reporting year, LNG Canada developed a *Noise Management Program* for operations, in accordance with the Facility Permit issued by BC Energy Regulator.

During the reporting year, the waste discharge authorization permit applications were submitted to BC Energy Regulator for air emissions and effluent discharges during operations.

### 8.1. Noise Complaints

As outlined in Section 4.2.2 of this report, the Community Feedback Mechanism was developed in consultation with Indigenous groups and key stakeholders to track inquiries and complaints related to community concerns, including noise. The Community Feedback Mechanism acknowledges all complaints within 48 to 72 hours.

- To date, LNG Canada's community feedback mechanism has responded to 389 individuals since we started the safe start-up and commissioning program. A total of eight interactions have been catalogued as complaints directly to LNG Canada and four through the BC Energy Regulator. Five additional phone calls about noise have been logged through LNG Canada's community feedback process.
- The complaints received have come from residents living in Strawberry Meadows and Kildala, which are the neighbourhood's closest to the LNG Canada site. LNG Canada continues to emphasize to these individuals that flaring, and the associated noise is temporary in nature and is a part of the commissioning and safe start-up process. Intermittent flaring is expected to occur over the coming two-year period.
- Between September 26 and October 2, 2024, LNG Canada representatives visited 40 homes in the Strawberry Meadows.
- Of the 40 residences that were visited, 23 homes had owners or tenants home and were spoken with. Notes were left at the remaining 17 homes that contained the reason for LNG Canada's visit with contact information to reach our staff if the resident had any questions or concerns, two of which responded.

- Of the individuals that LNG Canada staff interacted with during the home visits or in follow-up communications:
  - Six (6) had no concerns regarding LNG Canada start-up activities including noise
  - Nine (9) indicated that they could hear noise from the plant but were not bothered or disrupted by it
  - Seven (7) homes felt disrupted by noise but did not escalate this to a complaint
  - Three (3) residences raised complaints related to noise, which were followed up with in accordance with the LNG Canada Community Feedback Process
- All 40 residences were provided with information on the LNG Canada Community Feedback Process and were offered the opportunity to receive update email notifications regarding our commissioning activities, and 11 individuals signed up to this service. These individuals were notified of the transition to the Voyent Alert! System when it occurred.
- Following this initial outreach period, LNG Canada received one additional noise complaint through the BC Energy Regulator in December 2024. This concern was investigated internally, and the BCER received a response following the investigation.

In the fall of 2024, LNG Canada engaged with the Haisla Technical Team to address noise-related issues. A Safe Start-up and Safe Shipping information session was held in Kitamaat Village on December 12, 2024. By March 2025, LNG Canada had hosted three additional community sessions to discuss noise concerns, present measured noise levels, and focus on predicted noise levels for the start-up phase, reinforcing previous engagements from 2024.

During these sessions, community members were asked to map out locations, describe their experiences, and indicate the time of day to assist LNG Canada in identifying noise sources. This approach was well received and appreciated by both the community members and the Haisla Technical Team.

## **8.2. Marine Water and Sediment Quality**

LNG Canada marine EMPs for construction define minimum requirements and mitigations for marine work, including management and monitoring of marine water and sediment quality during construction.

The MMP includes an assessment of risks and potential duration of any exceedances of the CCME Water Quality and Interim Sediment Quality Guidelines, and BC Approved Water Quality Guidelines and Working Sediment Quality Guidelines that could occur in-water construction activities. The

marine EMPs identify mitigation measures to avoid such exceedances and reference notification protocols for any exceedances that do take place.

The marine EMPs identify mitigation measures to minimize sediment dispersion during in-water construction activities, such as project construction sequencing, consideration of metocean conditions, and use of physical barriers as appropriate. Sediment and water quality monitoring were implemented in accordance with the MMP during in-water construction activities historically.

## 9. Current Use of Lands and Resources for Traditional Purposes

LNG Canada is committed to protecting archaeological and heritage resources that could be impacted by the Project.

An Archaeological Impact Assessment (AIA) was conducted as per the BC *Heritage Conservation Act Heritage Inspection Permit 2013-0149* to identify potential areas of archaeological or cultural significance prior to construction activities commencing.

One archaeological site was identified during the AIA fieldwork for the Project (GaTe-5), which was relocated in a previous reporting year.

### 9.1. Archaeological and Heritage Resources Management Plan

The LNG Canada *Archaeological and Heritage Resources Management Plan* outlines the following hierarchy of mitigations for archaeological or heritage resources that require protection, preservation, or recovery:

1. Avoidance through partial redesign or redirection of construction activities, including implementation of setbacks, etc.
2. Protection and preservation of the site on a temporary or ongoing basis (e.g., concealment, access limitations, etc.)
3. Salvage or emergency excavation as a mitigating measure to recover and repatriate any materials or human remains as defined in a Site Alteration Permit

If a chance find is discovered on the LNG Canada site, work is stopped, and the area is delineated with barriers to prevent access and protect the resource. LNG Canada or JFJV will consult a professional archaeologist for guidance on further action. Further action may include confirmation that work can continue as planned, confirmation that work can continue under specific conditions, or confirmation that further assessment is required by a professional consulting archaeologist. All regulatory and Indigenous groups will be notified as directed by the professional archaeologist.

No chance finds occurred in the reporting year.

### 9.2. Marine Resources

To define procedures and practices for sharing information and facilitating communication with Indigenous groups and other local marine users, a communication protocol was developed by LNG Canada and incorporated into the construction MATMP. The communication protocol was developed

in consultation with regulatory agencies and Indigenous groups and approved by EAO in 2018. The protocol includes processes for communicating the following:

- Location and timing of construction activities in the marine environment and location and timing of traditional activities by Indigenous groups
- Safety procedures related to marine construction and operation, including navigation aids, and updated navigational charts
- Locations of restricted navigation due to safety reasons
- Operational speed requirements
- Methods of providing feedback to LNG Canada on adverse effects related to navigation

During the reporting year, LNG Canada communicated marine traffic information to Indigenous groups and marine users as per the MATMP. Key marine communications shared included shipping schedules, communication of key milestones, and dedicated meetings with Indigenous groups for planning for operational shipping.

# 10. Emergency Preparedness and Response

Unplanned events could arise from accidents or malfunctions associated with Project activities, resulting in impacts to environmental, social, health, heritage, or economic values.

Emergency procedures are in place to ensure timely and effective decision making in the critical period during and following an emergency. The LNG Canada emergency response framework contains a series of inter-related documents and manuals that outline the tools (plans, procedures, and processes) and reference materials required to facilitate a prompt, safe, efficient, and effectively managed response to all incidents resulting from LNG Canada construction regardless of size or complexity.

These incident management procedures are detailed in Emergency Response Plans (ERPs). LNG Canada subscribes to the principles and processes outlined in the Incident Command System structure and adheres to BC Energy Regulator requirements for emergency planning and emergency response as outlined in the Core ERP.

LNG Canada staff and contractors are required to report all incidents, including spills, to their supervisor as soon as reasonably practicable. Incident notification is escalated through the LNG Canada organization, and external stakeholder and regulatory notifications are completed. If an incident is deemed an Accident or Malfunction under the EAC, LNG Canada will notify relevant federal and provincial authorities and Indigenous groups, as soon as possible.

## 10.1. Communication Strategy

The *LNG Canada Strategy for Communicating Accidents or Malfunctions (Construction)*, was developed in consultation with Indigenous groups, as required by IAAC Decision Statement Condition 10.3. This Strategy outlines the process for notifying Indigenous groups, as well as contact information for reporting. Reportable scenarios and criteria are outlined in the Strategy for spills, explosion, fire, and vessel collisions.

For spills of hazardous materials (not including LNG), IAAC and Indigenous groups will be jointly notified of any spills that:

1. Are not contained within the Project footprint; and
2. Have potential to migrate off site (e.g., releases to waterbodies); and
3. Are not readily cleaned up or contained (i.e., incidents that trigger a larger response such as Incident Command System mobilization).

Any fire and explosion scenarios for the construction phase will, in all likelihood, be related to fuel storage on vessels and barges. For fires and explosions related to marine construction as outlined in the *LNG Canada Strategy for Communicating Accidents or Malfunctions*, IAAC will be notified and the affected Indigenous group, based on location of the incident and traditional territory considerations, will be notified.

Collisions between vessels or collisions between a vessel and a stationary object within the Port of Kitimat that result in environmental damage will be jointly reported to IAAC and Haisla Nation.

No accidents or malfunctions occurred in the reporting year therefore the communication strategy was not triggered.

An updated version of the LNG Canada Strategy for Communicating Accidents or Malfunctions to reflect scenarios that may occur during the asset operations phase LNG Canada was shared with Indigenous groups, this includes updated points of contact for Indigenous groups.