



Impact Assessment
Agency of Canada

Agence d'évaluation
d'impact du Canada

Pacific and Yukon Region
210A-757 West Hastings St.
Vancouver, B.C. V6C 3M2

Région du Pacifique et du Yukon
210A-757, rue Hastings Ouest
Vancouver (Colombie-Britannique) V6C 3M2



EAO

Environmental
Assessment Office

Summit Lake PG LNG
PO Box 9426 Stn Prov Govt
Victoria, B.C. V8W 9V1

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Sent by Email Only

Binyou Dai
Chief Operating Officer
JX LNG Canada Ltd.
info@jxlngcanada.com

Agency File No: 005908
EAO File No: [ENVA-30020-06/SUMLAK]

Binyou Dai:

Subject: Joint Summary of Issues and Engagement for the Summit Lake PG LNG Project

The Impact Assessment Agency of Canada (the Agency) and British Columbia's Environmental Assessment Office (EAO) conducted a comment period for the Summit Lake PG LNG Project (the Project) from April 2 to May 9, 2024. Participants were invited to review the Initial Project Description and to provide feedback related to the proposed Project. The enclosed Joint Summary of Issues and Engagement (Joint Summary) reflects the issues raised through comments received from the public, Indigenous groups, and technical advisors (federal authorities, provincial ministries, and local governments). As a next step, the Agency and the EAO expect JX LNG Canada Ltd. (JX LNG) to produce a single Detailed Project Description that will meet both federal and provincial requirements.

On October 13, 2023, the Supreme Court of Canada (SCC) issued its decision on the constitutionality of the *Impact Assessment Act* (IAA). On May 2, 2024, the Government of Canada tabled proposed amendments to the IAA through the *Budget Implementation Act* to respond to the SCC decision. The Agency will continue to apply the guidance in the *Statement on the Interim Administration of the IAA Pending Legislative Amendments*, set out by the Government of Canada in October 2023, until proposed amendments come into force.

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The proposed amendments are currently going through the parliamentary process, and the Agency will be available to provide further information to you regarding the amended IAA once it receives Royal Assent.

In support of the federal assessment process, JX LNG is encouraged to provide the Agency with a Detailed Project Description that details how JX LNG intends to address the issues documented in the Joint Summary. Please consult the [Guide to Preparing an Initial Project Description and a Detailed Project Description](#) for further guidance on the information that could be included in your Detailed Project Description.

The guidelines for completing a Detailed Project Description for the EAO are included in the [Early Engagement Policy](#). Under Section 39(a) of the provincial *Environmental Assessment Act* (2018), JX LNG has up to one year to submit its Detailed Project Description from the issuance of the Joint Summary or the Chief Executive Assessment Officer may terminate the assessment of the Project.

The EAO notes that the Detailed Project Description is a foundational document for Process Planning, should the Project proceed to an environmental assessment (EA). In preparing the Detailed Project Description, JX LNG will need to describe how the Project will meet the provincial Ministry of Environment and Climate Change Strategy, Energy Action Framework that requires all proposed LNG facilities in or entering the EA process to pass an emissions test with a credible plan to be net zero by 2030. The EAO strongly encourages JX LNG to submit additional documents along with the Detailed Project Description, including the proponent's proposed Application Information Requirements, based on the EAO's [Application Information Requirements Guidelines](#). The EAO will provide JX LNG with the latest example of the guidelines, and the Agency and federal authorities will advise on the inclusion of federal requirements. Federal requirements may change based on amendments to the IAA as described above. The EAO expects JX LNG to engage with Indigenous groups and technical advisors during the development of the Detailed Project Description to ensure their interests are considered. This engagement will help avoid uncertainty and potential time delays later in the process.

This engagement includes the sharing of drafts of the Detailed Project Description with these participants.

The Detailed Project Description should include the information provided in the Initial Project Description and updates, revisions, and further details following engagement with Indigenous groups, technical advisors and stakeholders. It is important that the Detailed Project Description describe how engagement activities and the Joint Summary were considered and how they may have contributed to changes in the Project.

JX LNG is asked to provide meaningful responses in the Detailed Project Description to the issues included in the Joint Summary. The Joint Summary and the proponent's responses will be used to inform the Agency's decision on whether an impact assessment is required for the Project, and the EAO's decision on whether the Project should proceed to an environmental assessment under the provincial *Environmental Assessment Act* (2018).

In preparing the response, there may be some issues that, in the view of JX LNG, are outside of its care and control. In this situation, JX LNG may choose to identify the party or parties with the potential to address the issue(s).

For ease of reference, the Agency and the EAO request that the response to the Joint Summary be provided in a table with reference to other parts of the Detailed Project Description as warranted. JX LNG should also prepare a detailed issues tracking table to respond to comments from all participants in greater detail. The Issues tracking table will be published on the EAO's Project Information Centre (EPIC) website at the end of the Early Engagement phase of the Project. As part of the comment period, the Agency also invited comments from the public and Indigenous groups regarding the request from the Government of British Columbia that the conduct of the federal impact assessment, should one be required, be substituted to the province. Comments received in relation to the substitution request will be considered by the federal Minister of Environment and Climate Change in making the substitution decision; they are not reflected in the Joint Summary and the proponent is not expected to provide a response to those comments.

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The Agency generally estimates that it could take approximately 30 days—or until July 12, 2024, in this case—to provide the Detailed Project Description for the federal process, including the response to the Joint Summary. In consideration of efforts being made to coordinate the federal Planning phase steps under the IAA and the provincial Early Engagement phase steps under the *Environmental Assessment Act* (2018), the Agency recognizes that the proponent may require additional time to produce the Detailed Project Description. You are encouraged to contact the Agency in the next few days to discuss how much time may be required.

JX LNG is reminded that all records produced, collected, or received in relation to the assessment of the Project—unless prohibited under the federal *Access to Information Act* or the provincial *Freedom of Information and Protection of Privacy Act*—will be considered public and posted on the Canadian Impact Assessment Registry internet site and/or the EAO's EPIC website.

If you have any questions or if the Agency or the EAO can assist in facilitating engagement with Indigenous groups and technical advisors during the development of the Detailed Project Description, please do not hesitate to contact Byron Vallis from the Agency at Byron.Vallis@iaac-aeic.gc.ca or John Antill from the EAO at John.Antill@gov.bc.ca.

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Sincerely,
<Signature removed>

Lisa Poier
A/Regional Director, Pacific and Yukon
Impact Assessment Agency of Canada

<Signature removed>

Elenore Arend
Chief Executive Assessment Officer and
Associate Deputy Minister
British Columbia Environmental Assessment Office

Enclosure

Cc:
Byron Vallis, Impact Assessment Agency of Canada
John Antill, Environmental Assessment Office
Kelly Wintemute, Environmental Assessment Office

Joint Summary of Issues and Engagement

1.0 Introduction

JX LNG Canada Ltd. (the proponent) is proposing to develop a new liquefied natural gas (LNG) facility located about 30 kilometres north of Prince George, British Columbia (B.C.). The Summit Lake PG LNG Project (the Project) would produce up to 2.7 million tonnes of LNG per year and include storage capacity for up to 200,000 cubic metres of LNG. The Project would operate for 30 years. As part of the Project, the proponent would build a new two-kilometre pipeline connecting to an existing natural gas pipeline. Ten kilometres of new rail track would also be built to connect to the existing rail network. The LNG produced at the facility would be transported to the Fairview terminal facility in Prince Rupert, B.C. for shipment overseas.

The Impact Assessment Agency of Canada (the Agency) and the B.C Environmental Assessment Office (EAO) have both reviewed the Initial Project Description for the Project, which is subject to the federal *Impact Assessment Act* (IAA) and the provincial *Environmental Assessment Act, 2018* (the Act). EAO accepted the Initial Project Description on February 15, 2024.

The Agency and the EAO are working cooperatively in a coordinated process for the initial phase of the Project's review in accordance with the [Impact Assessment Cooperation Agreement between Canada and British Columbia \(2019\) \(the Cooperation Agreement\)](#), and in support of the principle of “one project, one assessment.”

This Joint Summary of Issues and Engagement (Joint Summary) document has been prepared and issued by the Agency and the EAO as part of the federal Planning and provincial Early Engagement phases in the assessment of projects that are captured by both the federal IAA and the provincial Act. In accordance with the Cooperation Agreement, this Joint Summary is issued to the proponent in place of separate federal Summary of Issues and provincial Summary of Engagement documents.

As required by subsection 14 (1) of the federal IAA and paragraph 13(5)(a) of the provincial Act, this Joint Summary provides:

- a summary of the issues raised to the Agency or the EAO by the public during the joint public comment period;
- comments from Indigenous groups related to their interests in the project area;
- key issues or concerns identified by Indigenous groups regarding the Project; and,
- comments provided by technical advisors¹ after reviewing the proponent's Initial Project Description.

¹ Federal authorities, provincial ministries, local governments, and health authorities.

The Joint Summary also provides a list of participating Indigenous nations as per paragraph 13(5)(b) of the provincial Act. The proponent is required to consider the issues raised in the Joint Summary and respond to them in its Detailed Project Description and accompanying response to the Joint Summary. This Joint Summary, the proponent's response to the Joint Summary, and the proponent's Detailed Project Description will be used, among other things, by the Agency to determine whether a federal impact assessment is required, and by the EAO to determine if the Project is ready to proceed to a provincial environmental assessment.

Further details on the Project can be accessed in the Initial Project Description, Engagement Plan, and other documents on the Agency's [Canadian Impact Assessment Registry](#) or the EAO's [Electronic Project Information Centre website](#) (EPIC).

For this Joint Summary, editorial comments on the Initial Project Description are not included in the summary tables below; however, they have been provided to the proponent for consideration in the development of the Detailed Project Description.

2.0 Early Engagement Overview

During the coordinated process, the Agency and the EAO have sought to understand how the public, Indigenous groups, and technical advisors want to be engaged, and have gathered their initial interests, concerns, questions, feedback, and knowledge regarding the Project. The Agency and the EAO held public engagement events and meetings with federal authorities, technical advisors, and potentially affected Indigenous groups.

2.1 Joint Public Comment Period

The Agency and the EAO held a joint public comment period from April 2 to May 9, 2024. During the public comment period, the Agency and the EAO hosted one in-person open house in Prince George and one virtual information session. The in-person open house was held on April 10, 2024, with 32 participants. The virtual information session was held on April 18, 2024, with 27 participants. The events included information on the federal and provincial assessment processes and the Project, and opportunities to ask questions.

Sixty-six individual public comments were received by the Agency and the EAO during the joint public comment period. Comments are summarized below in section 4.0.

3.0 Indigenous Groups

The Agency and/or the EAO notified or received input from the following Indigenous groups and organizations whose interests could reasonably be expected to be affected by the Project:

- Kitselas First Nation*
- Kitsumkalum First Nation*
- Lheidli T'enneh Nation*
- Mcleod Lake Indian Band
- Métis Nation British Columbia
- Nak'azdli Whut'en First Nation
- Nazko First Nation*
- West Moberly First Nation

*indicates confirmed participating Indigenous nation under the Act. The number of participating Indigenous groups may change following the formal scoping of the Project and EA.

Under the provincial Act, Indigenous groups can self-identify as a participating Indigenous nation for the assessment of a project. Participating Indigenous nations are afforded specific procedural rights under the provincial Act, including capacity funding, consensus seeking processes, a procedure to communicate consent or withhold consent at key decision points, and access to facilitated dispute resolution.

Participating Indigenous nations under the provincial Act are identified in Table 1. The notices the EAO received from Indigenous groups self-identifying as participating Indigenous nations can be found on the EAO's [EPIC website](#).

Table 1 also identifies the Agency and the EAO's preliminary understanding of Indigenous groups' interests in the Project area and activities associated with the Project (e.g., rail transport and marine shipping), based on responses received from Indigenous groups. Specific issues identified by Indigenous groups are identified in Table 1. Some overlapping issues identified by Indigenous groups will be reflected in Table 2 where they are similar to those submitted by federal and provincial agencies and members of the public. For specific concerns regarding potential effects from the Project and associated activities, see Table 2.

Table 1: Preliminary Understanding of Indigenous Interests

Indigenous Group	Participating Indigenous Nation under the provincial <i>Environmental Assessment Act</i> (2018)	Summarized Understanding of Interests
Lheidli T'enneh First Nation	Yes	<p>Interests:</p> <ul style="list-style-type: none"> Lheidli T'enneh First Nation provided confirmation of their intention to be a participating Indigenous nation and may, at a later date, share a preliminary description of their interests in the Project. Through a letter of support sent directly to the proponent, Lheidli T'enneh First Nation expressed a special interest in the Project, specifically related to the socio-economic and environmental impacts of the Project
Kitselas First Nation	Yes	<p>Interests:</p> <ul style="list-style-type: none"> Governance and self-determination rights (the rail route associated with the Project cuts through four Kitselas First Nation reserve lands); Cultural and spiritual rights, including Kitselas First Nation's rights to protect and access areas of cultural and spiritual importance; and Rights to access lands and resources that Kitselas First Nation has traditionally owned, occupied or otherwise used or acquired

Indigenous Group	Participating Indigenous Nation under the provincial <i>Environmental Assessment Act</i> (2018)	Summarized Understanding of Interests
		<p>Potential Impacts:</p> <ul style="list-style-type: none"> • Socioeconomic impacts of rail traffic; • Impact of added rail traffic on the community’s safety and well-being; • Impact of added trains on the acoustic environment; • Increased risk of accidents and malfunctions in Kitselas First Nation’s territory due to increased rail traffic and marine shipping; • Impact on wildlife, specifically on moose which are already endangered and are of traditional importance; • Impact of increased marine shipping on marine resources; and, • Impact of increased rail traffic on accessing traditional sites (rail route transects through Kitselas First Nation territory) <p>Requests:</p> <ul style="list-style-type: none"> • Would like the rail line to be scoped in as an activity incidental to the Project, or otherwise need to hear a strong rationale as to why it’s not scoped in; and • Would like to know how Transport Canada’s “key route risk assessment” is integrated in the EA process, regardless of rail being scoped in or not as part of the Project
<p>Kitsumkalum Indian Band</p>	<p>Yes</p>	<p>Interests:</p> <ul style="list-style-type: none"> • Right to practice traditional activities; • Stewardship of Kitsumkalum First Nation lands; • Sense of place; and • Right to governance and self-determination <p>Potential Impacts</p> <ul style="list-style-type: none"> • Impact of increased marine shipping on marine resources; • Impact of added train traffic on community’s safety and well-being; • Impact of rail traffic on access to traditional sites (already have limited access due to rail traffic); • Impacts to sense of place from increased rail traffic; and

Indigenous Group	Participating Indigenous Nation under the provincial <i>Environmental Assessment Act</i> (2018)	Summarized Understanding of Interests
		<ul style="list-style-type: none"> • Cumulative effects of various projects using the same rail route <p>Requests:</p> <ul style="list-style-type: none"> • Would like the rail line and marine shipping to be scoped in as activities incidental to the Project; and • Would like to continue to be advised on developments regarding the consideration of the inclusion of rail transport and marine shipping as activities incidental to the Project
Nazko First Nation	Yes	<p>Interests:</p> <ul style="list-style-type: none"> • Nazko First Nation, based on an initial assessment of the Project, determined that the Project will have an impact on its Aboriginal Rights and interests <p>Potential Impacts:</p> <ul style="list-style-type: none"> • Impact to water and soils and downstream leading to effects into Nazko First Nation territory; • Impact to aquatic species, including species at risk in the watershed; • Impacts of the Project on air quality; • Socio-economic impacts related to the location of workcamp; and • Impact of rail transport of LNG on Nazko First Nation’s territory <p>Requests:</p> <ul style="list-style-type: none"> • Request for capacity funding to support their continued participation and thorough review of the potential impacts of the Project on Nazko First Nation rights

The Agency and the EAO expect the proponent to engage with each of the Indigenous groups listed in section 3.0 to ensure their interests and issues are reflected in the Detailed Project Description

4.0 Summary of Issues

This section provides a high-level summary of the issues raised in comments received by the Agency and the EAO from the public, Indigenous groups, federal authorities, and technical advisors on the proponent’s Initial Project Description (see Table 2). The proponent is directed to review the original submissions posted on the Agency’s [Canadian Impact Assessment Registry](#) and the EAO’s [EPIC website](#).

Note that this document provides a summary of comments received; it does not evaluate those concerns, nor does it define what is to be addressed in the impact assessment.

The Joint Summary does not include comments received on B.C.'s request to substitute the conduct of the federal impact assessment, should one be required, to the province. Should a federal impact assessment be required, the federal Minister of Environment and Climate Change will consider any comments received in deciding whether to approve the request for substitution. The Agency will post a notice of the Minister's decision with respect to the request for substitution along with the reasons for the decision on the Agency's [Canadian Impact Assessment Registry](#).

Table 2: Summary of Issues Raised

<p>Accidents, Malfunctions, and Public Safety</p> <ul style="list-style-type: none"> • Clarity on the Project's emergency response plans (including community awareness, evacuation plans, and emergency communication plans) and effective reporting of natural gas leaks and the capacity of existing response providers in surrounding communities • Effects of accidents and malfunctions, specifically their potential geographical extent, risks, consequences, and proposed mitigation measures and emergency response plans aimed at minimizing impacts • Clarity on Community Awareness and Emergency Communications plans, including existing emergency preparedness and response systems and existing arrangements and/or coordination with qualified response organizations, including exercise and training plans for spill emergency response • Evaluation of all environmental risks related to the Project and plans to mitigate spills or releases of hazardous/deleterious substances, including from railway or road accidents • Information on discussions held with rail operator(s) as to the parameters around shipping ISO containers of LNG on their system • Maritime transport accidents are identified, but not rail transport accidents • Need for information on loss of containment of substances other than LNG (refrigerants, condensates, amine, etc.) and mechanical handling accidents (e.g. drops during ISO container movements) in the accidents and hazards section • Clarity on whether there is an established hazardous goods route for material transport to and from the facility
<p>Acoustic Environment (Terrestrial)</p> <ul style="list-style-type: none"> • Potential noise effects (including annoyance and sleep disturbance) to people living in or using the Project area and other identified sensitive receptors using the most recent guidance from Health Canada (2023)
<p>Alternative Means of Carrying Out the Project</p> <ul style="list-style-type: none"> • Need for information in the event that any alternative means of carrying out the Project are not selected, including when any “best in class” environmental protections are not selected due to economic considerations • Evaluation of alternate scenarios including delay of electrical connection, delay of connection to gas pipeline, delay of rail access, lack of water and what JX LNG will do to manage potential impacts from alternative ways to operate the Project • Evaluation of alternative means of carrying out the Project including considerations of GHG emissions, alternative locations, means of transporting the LNG to the export terminal, power supply for the facility, and emissions base case
<p>Atmospheric Environment</p> <ul style="list-style-type: none"> • Need for air quality monitoring stations on Lheidli T’enneh First Nation reserve lands to establish baseline air quality data • Need for information describing all potential effects of Project components or activities (including associated rail) on air quality • Need for information on all Criteria Air Contaminant (CAC) emissions including TSP, CO₂ and O₃ as toxic waste products • Need for detailed description of emission controls, mitigation measures, and emissions reduction plans to minimize impacts to the receiving environment • Need for description of the methodology for conducting air quality impact assessment, including how impacts of air emissions will be minimized by utilizing BC Hydro's green electricity

- Need for a comprehensive emissions inventory to complete air quality assessment
- Need for dispersion modelling to validate the assumption made in the IPD that the location will reduce the potential for inversions and build up
- Clarity on the definition of "fine particulates" and "coarse material"
- Need for inclusion of information on mitigation measures for other potential air contaminants in addition to GHG emissions

Climate Change and Greenhouse Gas (GHG) Emissions

- Need for information on the Project's GHG emissions, upstream GHG emissions, and climate change impacts using the Strategic Assessment of Climate Change (SACC), including a carbon sink assessment; include details on the implications of carbon capture or other GHG mitigation measures on GHG emissions and the net-zero plan
- Clarity in the breakdown of Project phases (e.g. phase 1 and 2) and their GHG emissions, including clarity on if/how they overlap, and provide annual totals
- Need for additional information related to assumptions and/or estimating the decommissioning emissions, including a breakdown by sources
- Concern regarding the comparison of the Project's GHG emissions to provincial totals as this is not a meaningful comparison and GHG emissions are cumulative in nature
- Need for inclusion of a net-zero plan as part of the Application Information Requirements to align with B.C. Government's plan to reduce climate changing emissions by 2030
- Need for additional detail regarding natural gas vented from ISO containers and if this is included in the GHG emission inventory
- Clarity on whether or not an annual emission estimate from acquired energy should also be included in phase 2
- Need to revisit plan to achieve net-zero emissions, as it currently includes consideration of international downstream emissions, which may not be a valid approach
- Need to consider components of the Project such as use of electricity and transport of gas in the GHG assessment, including upstream and downstream emissions domestically
- Need for inclusion of GHG emissions from container manufacturing and their shipping in the assessment
- Need for consideration of the impacts of the Project's emissions on climate change and wildfires, and subsequently on the livelihood of the people living in the area
- Concern that the Project will contribute additional GHG emissions and it is not supporting actions to address climate change concerns

Land Use and Culture

- Need for the understanding Lheidli T'enneh First Nation's ways of knowing and being, including past and current land use and culture, to guide engagement and development, and to incorporate local and Indigenous knowledge in the planning and permitting processes
- Need for additional detail regarding land use plans to confirm existing plans (e.g., Carrier Sekani Environmental Stewardship Initiative)
- Need to address the potential for adverse effects of the Project on Indigenous culture, heritage sites, and Indigenous way of life

Cumulative Effects

- Potential for cumulative effects, specifically for air and water quality, due to the high number of projects in the area
- Clarity needed regarding conclusions made in the IPD about cumulative effects and their magnitude
- Potential for cumulative effects of the Project on all valued components including human health, and wildlife populations

- Need for the assessment of cumulative effects of the Project to include any looping Enbridge might need to take on to supply the required gas for the Project, and the effects of any expansion to BC Hydro infrastructure needed to support the Project
- Need for the inclusion of increased rail transport in the scope of the impact assessment, as the Project would increase rail traffic on a section of railway that transects multiple cities, towns, and crosses many fish bearing rivers
- Concern about the cumulative effects of exploration, drilling, fracking, pipelines, and railway lines

Natural Gas Extraction, and Current and Future Generations

- Opposition against new fossil fuel extraction or combustion projects due to the climate emergency, and effects to future generations
- Opposition to another natural gas connection and fracking due to the potential damage to wildlife and their habitat
- Opposition to investments in another fossil fuel project instead of cleaner energies such as wind or solar projects
- Concerns regarding fracking and methane leaks and the impact of methane on increasing global temperature
- "Net-zero" emissions cannot be achieved due to the lifecycle emissions of fracked gas, which includes significant methane leakage into the atmosphere

Differential Impacts upon Diverse Persons and Groups

- Need for consideration of how different populations within the participating Indigenous Nations (women, children, dis(abled), etc.) and those in the city of Prince George might be affected by the Project-social interactions
- Need for consideration of a Gender-Based Analysis Plus approach in the section discussing the workforce; proactive mitigating measures related to employment should be developed early in the project cycle
- Need for information about the social impacts and mitigation of safety and community concerns related to a transient, male-dominated workforce, with consideration of the recommendations of Canada's national inquiry into Missing and Murdered Indigenous Woman and Girls
- Clarity on how the issue of violence against minorities, usually associated with work camps and extractive industries in small communities will be addressed

Social and Economic Conditions

- Need for inclusion of a socio-economic baseline study for Lheidli T'enneh First Nation, which should include a skills inventory, and understanding of the current education and employment capacity to ensure members of Lheidli T'enneh First Nation benefit from education and training opportunities
- Need for information on types of employment skills and knowledge required to support the completion of the Project, employment barriers for local underrepresented groups, target percentage of Indigenous workforce, prioritized training and employment opportunities for Indigenous peoples, and training opportunities
- Need for description of the benefits of the Project, specifically to Lheidli T'enneh First Nation and its members, in terms of jobs, contracting opportunities, impact benefit agreements, and revenue sharing
- Need for additional detail of the Project's benefits, including for jobs, training, economic benefits to the local community and Indigenous groups, and new business development opportunities
- Need for additional information on workforce capacity and skillset including age distribution of the local population, local employment and participation rates, statistics on skilled workers for construction, average employment income (disaggregated by gender), local population and labour market status of underrepresented groups (e.g. women, youth, Indigenous peoples, members of racialized populations, and persons with a disability), and comparisons to provincial averages

- Need for description of what assistance will be provided to employees affected by potential layoffs over the lifecycle of the Project
- Need for additional details on job creation, including estimates of job creation by type, and the total direct, indirect, and induced employment to be created locally for each phase, including a description of full and part time employment
- Need for information on expected secondary or tertiary employment impacts
- Include the estimated number of workers hired locally, and a description of efforts to recruit and train local and Indigenous workers
- Describe the anticipated impacts and alignments with Indigenous communities regarding employment
- Describe the distribution of social and economic benefits from the Project with consideration to the capacity and interests of local communities (particularly Indigenous groups)
- Need to engage with Indigenous Skills and Employment Training Program (ISET) service delivery providers in the surrounding area
- Need for a commitment to employing First Nations-owned companies to encourage meaningful Indigenous participation in the Project's workforce and support Indigenous entrepreneurship
- Need for inclusion of details on the amount of money the Project would bring to Canada, B.C., and communities in proximity to the Project site
- Need for inclusion of consideration of the impacts of climate change on local population's livelihood such as their ability to farm
- Need for the proponent to prioritize hiring local employees and buying local material
- Importance of confirming the work scheduling requirements of the temporary worker camp
- Need for the proponent to work with relevant authorities to collect baseline information on childcare costs, need, and program availability in the area
- Need for the inclusion of disaggregated population data on local Indigenous and non-Indigenous communities, including the five indigenous communities and Métis communities within 30 km of the Project location, the community of Salmon Valley, and the city of Prince George

Effects of the Environment on the Project

- Need for information on the effects of the environment on the Project, and the effects of the Project on the environment, including those related to seismicity (e.g. earthquakes, volcanic hazards) and terrain hazards (e.g. landslides)
- Need for the preliminary engineering studies to reference Seismic and Geotechnical studies
- Need for the inclusion of information on the impacts of wildfires as a natural disaster on the Project in the Detailed Project Description
- Need for description of the Project's resilience to future climate change, and where relevant, how these are considered in Project design
- In the next phase of the assessment, need for information on the seismic hazard assessment, groundwater withdrawal, and the landslides/slope stability assessment

Environmental and Impact Assessment Processes

- Importance of scoping all transportation routes (rail and road) into and out of the Project site into all relevant assessments
- Need for a description of the extent to which the listed ancillary project components and other potentially associated activities (e.g. pipeline loop, meter station, rail transportation, etc.) will be assessed as part of the impact assessment process
- Clarity on whether the amount of LNG stored onshore awaiting shipping may exceed trigger points for both provincial and federal environmental assessments

Fish and Fish Habitat

- Clarity on whether or not effects to fish and fish habitat and aquatic species at risk can be managed with standard mitigations or if the Project is likely to result in residual effects; if residual effects are likely following mitigation, and need to identify the impacts, location, and Project component(s) responsible, and need to identify the mitigation strategy to manage the impacts (including an offsetting plan)
- Clarity on the use of least risk windows; some details of anticipated or already known "least risk" work windows would be valuable
- Project is located near an important spawning area for anadromous fish; need for inclusion of mitigation measures (e.g., grading, ditching and retention ponds) required to prevent Project surface water runoff during construction and operation phase
- Concerns regarding the effectiveness of mitigation measures designed for impacts of the Project on fish and fish habitat
- Concerns regarding the protection of salmon and other fish species in the area of cultural and traditional importance to First Nations

General – Project Description

- Need for provision of detailed descriptions, including visuals, of project components and processes in a way that can be understood by the general public
- Need for updated list of stakeholders to include all relevant Federal Authorities and organize the list to separate different kinds of stakeholders e.g. Federal Authorities, private companies, etc.
- Clarity around the Enbridge looping project as a component of the Project
- Need for additional information on Project components and associated activities related to port location and storage of LNG containers, LNG storage logistics, volume of LNG anticipated for transport via rail, number of vessels needed for marine shipping of LNG product, the volume of LNG anticipated to be in containers, and transport of ISO containers from filling area to trains
- Need for additional detail regarding biophysical feasibility studies that the proponent is planning to conduct
- Need for additional information on the Project's required flare system and its contribution to potential human health, air quality, and wildlife effects near the Project
- Need for description of how traffic levels would be impacted and what additional infrastructure would be required for each transportation scenario, including a description of the methodology used, and a description of how effects would be considered in the cumulative effects assessment
- Need for description of the proposed associated rail route(s), including proximity to Indigenous communities and reserve lands, and explain potential pathways of effects from increased rail line use (e.g. safety, emergencies), and completed/planned engagement with Indigenous communities potentially affected by increased rail traffic
- Need for provision of site descriptions and transport methodologies for heavy hydrocarbon and other effluent disposal
- Need for additional information on the proposed access road and any proposed infrastructure upgrades
- Terms such as 'green', 'renewable', and 'net-zero' present an overly favourable view of the Project that could misguide readers
- The Project may harm the environment of BC, safety of its citizens, GHG reduction targets, and the interests of Indigenous people
- Clarity on quantity of electricity needed from BC Hydro and where it would come from, as BC Hydro is currently a net importer of electricity with much of it sourced from natural gas and coal-fired plants
- Concerns regarding foreign-owned companies operating in B.C. and Canada

<ul style="list-style-type: none"> • Need for additional details on the calculations and assumptions of the amount of LNG stored, as it seems like it may be greater than suggested in the Initial Project Description • Need for an updated list of the Project’s equipment, to include the ISO container loading system and an estimated range of volumes for the condensate storage tank, butane storage, and propane storage • Consideration of the impacts of the Project’s ancillary components on vegetation in the Detailed Project Description
<p>Human Health and Well-Being</p> <ul style="list-style-type: none"> • Need for information on the locations and distances of all sensitive human receptor locations (including temporary facilities) that may be affected by the Project • Need for a detailed Health Impact Assessment to be conducted in collaboration with Indigenous Peoples to assess important socio-economic factors, including determinants of health • Need for a complete assessment of potential air quality health effects for the Project using the most recent guidance from Health Canada (2023) • Need for confirmation on whether or not PFAS (i.e. “forever chemicals”) will be used in any aspect of the Project; if so, a human health risk assessment and/or site management plan may be needed to reduce potential exposure • Concerns regarding the use of first-person interviews to assess potential air pollution exposure and its impacts on health • Need for a clear plan for mitigating the impacts of the Project on human health • Concerns regarding the location of work camps and the potential adverse effects of the location of work camps on nearby communities • Impact of methane emissions on human health • Impact of the Project on respiratory diseases, especially in children and the elderly
<p>Indigenous Peoples’ Rights and Interests</p> <ul style="list-style-type: none"> • Need for consideration of potential impacts to hunting, fishing, trapping, foraging (harvesting), and access to traditional sites and how these will be assessed and mitigated • Need for additional information on areas of significance for Indigenous communities from the perspective of traditional land use; areas of significance for Indigenous peoples could be shown on maps demonstrating proximity to Project components • Need for provision of information on all potentially impacted Indigenous groups, including population and demographic statistics, size and location of reserve lands, governance structure, employment and education statistics, housing information, and access to services; detailed maps showing reserve lands and nearby Indigenous groups should be included • Need for additional information as to how the proposed Project is aligned with Indigenous nations laws, customs and policies • Need for additional detailed information regarding proposed outreach to help Indigenous nations better understand the risks and mitigations
<p>Infrastructure and Services</p> <ul style="list-style-type: none"> • Need for description of the capacity of BC Hydro to supply required hydroelectric power to the Project and any related impact on surrounding communities • Need for description of the capacity and expected utilization of on-site housing • Need for description of plans to mitigate risks from power outages • Concern that the Project is proposing to use hydroelectricity for a fossil fuel project when the electricity could be used to support a clean economy
<p>Land and Resource Use</p>

<ul style="list-style-type: none"> • Need for incorporation of Lheidli T'enneh First Nation's Environmental Management Plan into the Project as necessary • Portions of the Project fall within the Agricultural Land Reserve (ALR); need for an agricultural impact assessment • Clarity on the type of land that the proponent is considering using, and whether or not the land used for the Project is privately owned
<p>Marine Shipping</p> <ul style="list-style-type: none"> • Clarity on whether the Ridley Island Export Logistics Platform will be used for LNG product storage and that the Fairview Terminal will be used for LNG project marine transportation; if these facilities can't be confirmed, recommend assessing any other options being pursued • Confirmation on the marine transport mode for the LNG products • Concerns regarding the number of large shipping vessels used for export of LNG, and their potential impact on marine mammals
<p>Migratory Birds</p> <ul style="list-style-type: none"> • Concerns regarding the identification and assessment of the Project's impacts on migratory birds, species at risk, and their habitats, including assessing the Project's direct and indirect impacts; designing mitigation measures; offsetting for unavoidable loss of habitats; considering the Project's residual effects, and conducting a cumulative effects assessment
<p>Navigation</p> <ul style="list-style-type: none"> • Need for information on waterways that may be impacted from a navigation perspective • Need for inclusion of details from the <i>Canadian Navigable Waters Act</i> self-assessment
<p>Other</p> <ul style="list-style-type: none"> • Need for inclusion of all necessary permits: building permits from the Regional District, waste disposal, heritage sites investigation, tree clearing, water licenses for energy resources activities, license of occupation for work camps, occupant license to cut, permits required from the Regional District, road use permit in case of planning to use Salmon Forest Service Road as an access road • Clarity on whether the Project is being subsidized by B.C. or Canada, and if so, by how much • Proponent currently does not have an export license as per the requirements of the <i>Canadian Energy Regulator Act</i> and has not made an application for it • Impact of light pollution caused by the Project in the area • Concern regarding the Project's impact on the vegetation in the area and subsequently the soil stabilization
<p>Public and Stakeholder Engagement</p> <ul style="list-style-type: none"> • Need for additional detailed information regarding proposed outreach to help governments and the public better understand the risks and mitigations • Lack of clarity around engagement with First Nations, members of the public and other stakeholders and issues raised about public and environmental safety • Need for engagement with all climate-concerned groups across B.C. • Importance of including input from communities beyond just a few kilometres of the Project • Need for the list of stakeholders to be updated to include many more groups
<p>Purpose of and Need for the Project</p> <ul style="list-style-type: none"> • Need for description of who the target consumer for the LNG is (e.g. local and/or international) • On a full-cycle basis, LNG produced from natural gas sourced from B.C., shipped to Asia, and then burnt to produce electricity would have higher GHG emissions than locally produced Asian coal • Need for provision of detailed rationale to as to how the Project's primary purpose is the reduction of GHG emissions

- It is unclear why the Project is needed considering volume of existing LNG projects globally additional GHG emissions that would result from the Project

Species at Risk, Wildlife and their Habitat

- Need for the proponent to consider the fisher habitat (fisher is currently red-listed by the British Columbia conservation data centre) prior to issuance of an occupant license to cut; more information is needed regarding suitable fisher habitat in the area, and the identification of specific forestry practices to manage the fisher habitat
- Concern regarding harm to wetlands and trees as a result of the Project construction
- Concern regarding harm to wildlife due to project activities, or as a result of monitoring practices
- Need for the development of a no-kill wildlife coexistence strategy including pest control practices
- Concern about wildlife damage during laboratory testing of effluents for gas plants
- Concern regarding the need for more studies to better understand the impacts of flaring on migratory birds, bats, and other species
- Adding more trains to the existing rail traffic in the area will increase the mortality risk of moose and other wildlife species due to collision, loud noises, and ground vibrations; upgraded fencing around the rail route is needed to decrease the risk

Transportation (Land)

- Need for confirmation on whether the rail terminal loop is the same as the rail yard or spur
- Need for description of who will build, own, and operate the new rail infrastructure, whose trains will operate on the tracks, and if only ISO containers will be transported from the Project site
- There will be a significant increase in existing rail traffic between Project site and Prince Rupert and the environmental, social, and economic costs should be assessed

Water Quality and Processes

- Need for identification of the sources of LNG cooling water and the environmental effects of its extraction, transportation, and disposal
- Need for a description of the discharge process of wastewater
- Clarity on amount of water required and which aquifers and watersheds the water will be provided from, as well as a description of any adverse effects to other water users, plants, wildlife, and water quality
- Need for the consideration of the impact of fracking on water resources, water quality and salmon population in the area Need for well details, an assessment of groundwater pumping and characterization of the groundwater source, should groundwater be used as a water source

Wetlands

- Need for studies to identify and assess the Project's direct and indirect impacts on wetlands and wetland functions in the Project study area
- Need for design of mitigation measures and offsetting for wetland habitat loss
- Need for consideration of the Project's residual effects and cumulative effects on wetlands

5.0 Next Steps

The next steps in this initial phase of the coordinated process include:

- The proponent is required to submit a Detailed Project Description to the EAO that includes responses to the issues raised in the Joint Summary within the timelines described in the covering letter. The proponent is encouraged to provide the same information to the Agency to inform the next steps in the federal process.
- The proponent is expected to engage with technical advisors and each of the Indigenous groups and nations listed in section 3.0 to ensure their interests and issues are reflected in the Detailed Project Description.
- The proponent is encouraged to submit additional documents along with the Detailed Project Description, including the proponent's proposed Application Information Requirements.

The Agency will use, among other things, the Detailed Project Description including the response to the Joint Summary, to determine whether a federal impact assessment is required and the EAO will use it to determine if the Project is ready to proceed to a provincial environmental assessment.