



Trigon Pacific LPG Project

Plain Language Summary

June 12, 2026

Table of Contents

1	GENERAL INFORMATION	4
1.1	PROPONENT INFORMATION	4
1.2	PROJECT LOCATION	4
1.3	LEGAL DESCRIPTION OF LAND.....	4
1.4	PRELIMINARY SPATIAL BOUNDARIES.....	5
1.5	PROPOSED DEVELOPMENT	7
1.6	PURPOSE AND NEED FOR THE PROJECT	7
1.6.1	<i>Enhancing Market Access for Canadian LPG Through Competitive Export Infrastructure.....</i>	<i>8</i>
1.6.2	<i>Supports Long-Term Canadian LPG Export Opportunities in Response to Growing Global LPG Demand.....</i>	<i>8</i>
1.6.3	<i>Unlocking Global Value: Canadian LPG and Export Diversification.....</i>	<i>8</i>
1.6.4	<i>Building a More Competitive and Resilient LPG Export Sector</i>	<i>9</i>
1.6.5	<i>Provides employment and Economic Benefits that support Canada’s Economic Growth Objectives</i>	<i>9</i>
1.7	ALTERNATIVE MEANS OF CARRYING OUT THE PROJECT	9
1.8	ALTERNATIVES TO THE PROJECT	10
1.9	ENGAGEMENT	10
1.9.1	<i>Indigenous Engagement</i>	<i>10</i>
1.9.2	<i>Industry Engagement.....</i>	<i>10</i>
1.9.3	<i>Public and Stakeholder Engagement.....</i>	<i>11</i>
1.10	SUPPORT FOR THE PROJECT	11
1.10.1	<i>Support from Community and Industry</i>	<i>11</i>
1.10.2	<i>Support From Indigenous Communities.....</i>	<i>11</i>
2	DESCRIPTION OF THE PROJECT	12
2.1	PROJECT SCOPE	12
2.2	PHASED APPROACH.....	12
2.3	PROJECT COMPONENTS AND ACTIVITIES.....	12
2.3.1	<i>Project Components.....</i>	<i>13</i>
2.3.2	<i>Project Activities Overview.....</i>	<i>13</i>
2.4	PROJECT SCHEDULE.....	14
3	PAST STUDIES, LAND USE AND REGULATORY OVERVIEW	15
3.1	PAST STUDIES	15
3.2	LAND USE DESIGNATION	15
3.3	FEDERAL FINANCIAL SUPPORT	15
3.4	REGULATORY FRAMEWORK.....	15
3.4.1	<i>Federal Regulations</i>	<i>16</i>
3.4.1.1	<i>Impact Assessment Act.....</i>	<i>16</i>
3.4.2	<i>Provincial Regulations.....</i>	<i>16</i>
3.4.2.1	<i>British Columbia Environment Assessment Act</i>	<i>16</i>
4	ENVIRONMENTAL OVERVIEW	17
4.1	PROJECT ENVIRONMENTAL SETTING SUMMARY.....	17
4.2	PROJECT SOCIAL AND ECONOMIC BACKGROUND SUMMARY	17

5	INDIGENOUS PEOPLES AND TRADITIONAL LAND USE	19
5.1	OVERVIEW.....	19
5.2	CONSULTATION AND ENGAGEMENT	19
5.3	KEY ISSUES RAISED.....	19
5.4	POTENTIAL CHANGES AFFECTING INDIGENOUS INTERESTS	21
5.4.1	<i>Impact to Indigenous health, social, economics</i>	21
5.4.2	<i>Preliminary Assessment of Potential Impacts to Indigenous Groups Resulting from Project Activities</i>	21
6	POTENTIAL PROJECT EFFECTS	23
6.1	ANTICIPATED PROJECT EMISSIONS	24
6.1.1	<i>Construction Phase</i>	24
6.1.2	<i>Operations Phase</i>	24
6.2	GHG ESTIMATE.....	25
6.2.1	<i>Overview</i>	25
6.3	ACCIDENTS AND MALFUNCTIONS	25
7	REFERENCES	26



1 General Information

1.1 Proponent Information

Company Name: Trigon Pacific Terminals Ltd. (Trigon)

Company Profile: An independent, multi-commodity dry and liquid bulk export terminal operator within the Port of Prince Rupert. Trigon is partly owned by the Lax Kw'alaams Band and Metlakatla First Nation.

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1.2 Project Location

Trigon Pacific Terminals (Trigon) is located on Ridley Island, approximately 10 km south of Prince Rupert, BC (Table 2-1, Figure 2-1). Prince Rupert is in northwestern BC, approximately 775 km from Vancouver.

Site Location	Ridley Island, BC (south of Prince Rupert)
Geographic Coordinates	54°13'40.12"N, 130°19'39.95"W
UTM Coordinates	09U 412952.32 E, 6009691.80 N

Table 2-1: Site Identification

1.3 Legal Description of Land

All land and water rights required for the project are currently under a lease agreement with the Prince Rupert Port Authority

Land Lot: Parcel Name 005-047-714 PRP 10924 Parcel H

Water Lot: 005-047-943 PRP 10934 Lot 1

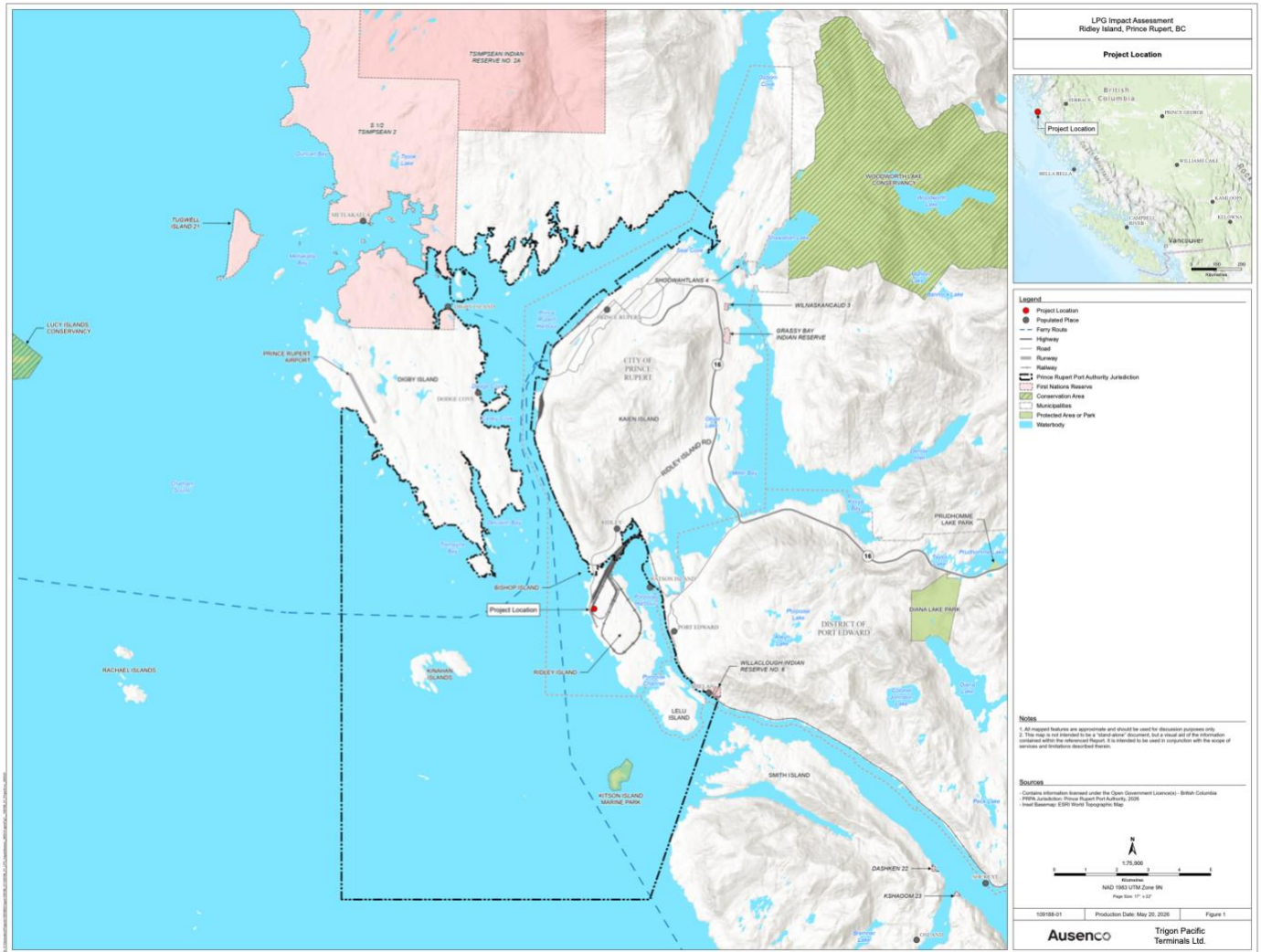


Figure 2-1: Project Location

1.4 Preliminary Spatial Boundaries

Preliminary spatial boundaries for assessing Project effects are outlined in Table 2-2. These boundaries will be refined further as VC selection is finalized and additional scoping work is completed.

Table 2-2: Preliminary Study Area Boundaries

Pillar	LSA Boundary and Rationale	RSA Boundary and Rationale
Environment	The LSA will be defined for each Environmental VC and will be based on the zone of influence of the Project on the VC.	The RSA will be defined for each Environmental VC and will be based on the potential interaction of the effects of the Project with the effects of other existing or future effects on the same VC. The selection of the RSA will be informed by: <ul style="list-style-type: none"> • results of air dispersion modelling

Pillar	LSA Boundary and Rationale	RSA Boundary and Rationale
	<p>The selection of the LSA will be informed by:</p> <ul style="list-style-type: none"> • Guidelines for Air Quality Dispersion Modelling in British Columbia (BC MOE 2008) for potential effects to air quality (to be refined through modelling) • British Columbia Noise Control Best Practice Guideline (BC OGC 2009) where potential interactions are anticipated to occur with the acoustic environment • the Project footprint • the LSA for vegetation will be the project footprint • the LSA for wildlife resources will be the project footprint • the LSA for fish and fish habitat, if required, consists of a 100m buffer around the existing jetty 	<ul style="list-style-type: none"> • BC OGC guidelines on acoustic effects, indicating that the RSA for the acoustic environment will extend 5 km from the Project boundary • the RSA for vegetation will consist of a 100m buffer surrounding the Project footprint • the RSA for wildlife resources will consist of a 100m buffer surrounding the Project boundary. The nearby locations of National Wildlife Areas and WMAs will further inform the RSA. • the RSA for fish and fish habitat, if required, consists of a 500m buffer around the existing jetty
Economic	The LSA for Economic conditions includes the City of Prince Rupert and District of Port Edward	The RSA for Economic conditions will be the North Coast Regional District and the Regional District of Kitimat-Stikine
Social	The LSA for Social conditions will include City of Prince Rupert, the District of Port Edward, and the boundaries of potentially affected Indigenous communities	The RSA for Social Conditions will be the North Coast Regional District and the Regional District of Kitimat-Stikine.
Heritage	The LSA for the archaeological and Heritage resources assessment will be the area of ground disturbance for the Project.	The RSA for the archaeological and Heritage resources assessment will be the same as the LSA
Health	The LSA for the assessment of potential Health risks to humans from potential changes to air quality will be the same as that for air quality	The RSA for the assessment of potential Health risks to humans from potential changes to air quality will be the same as that for air quality

1.5 Proposed Development

The Project will consist of up to twenty rail unloading racks, gas driven compressors¹, connection to the BC Hydro grid, refrigeration processing equipment, and associated piping, which will allow for a minimum average throughput of approximately 2.4 million metric tonnes per annum. A natural gas connection to PNG may be utilized for back up and redundancy purposes. The Project footprint is shown in Figure 2-2.

No further berth development is required.

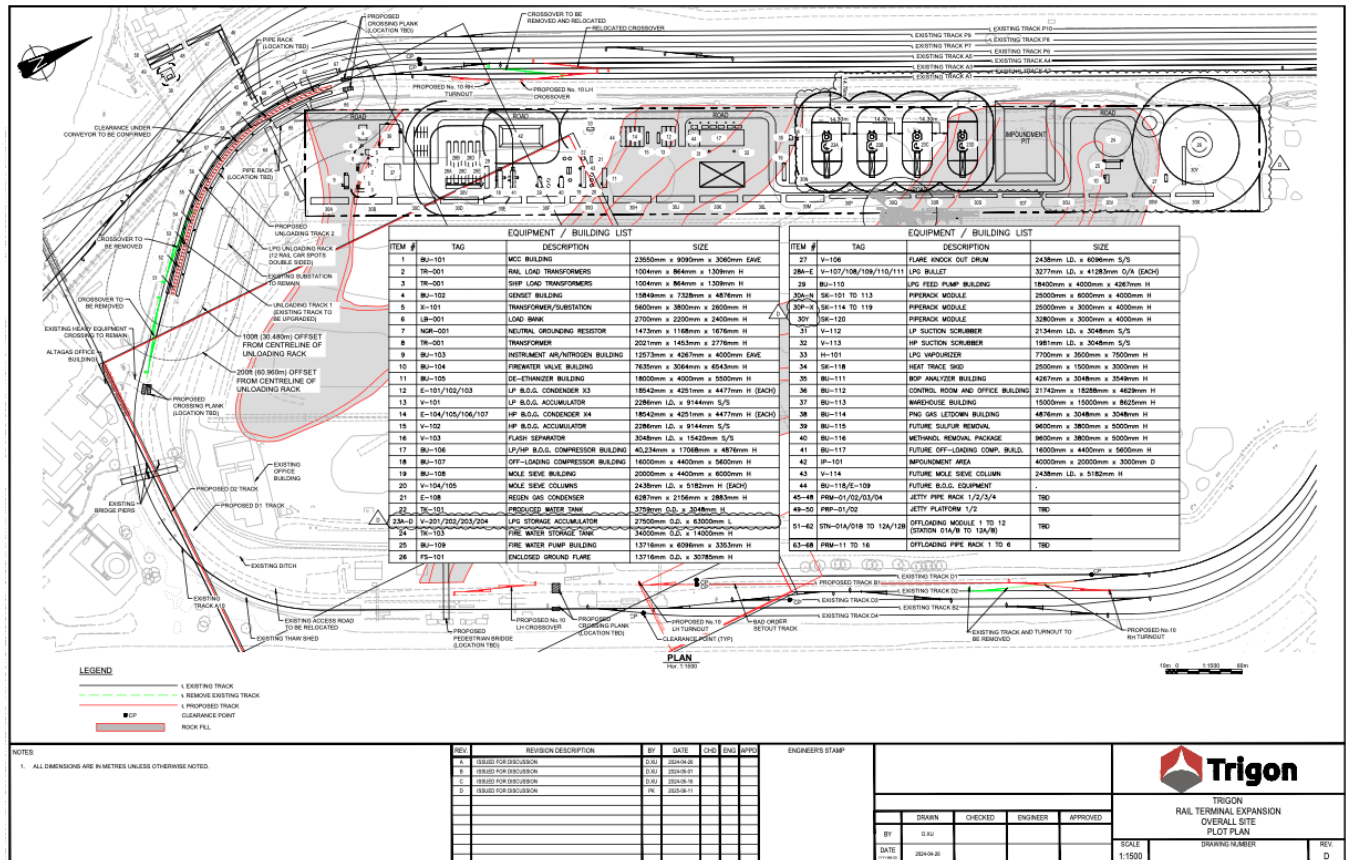


Figure 2-2: Project Footprint

1.6 Purpose and Need for the Project

The proposed Trigon LPG Project provides the following key benefits:

- Enhances Market Access for Canadian LPG Through Competitive Export Infrastructure;
- Supports Long-Term Canadian LPG Export Opportunities in Response to Growing Global LPG Demand;

¹ Subject to power availability from BC Hydro and final engineering design.



- Unlocks Global Value Through Export Diversification;
- Builds a More Competitive and Resilient LPG Export Sector; and
- Provides employment and Economic Benefits that support Canada's Economic Growth Objectives.

1.6.1 Enhancing Market Access for Canadian LPG Through Competitive Export Infrastructure

Western Canada has experienced a long-term propane surplus due to growing natural gas production. Although several export terminals have been built, demand still lags supply and existing export facilities are operating near capacity. Additional export infrastructure is needed to move Canadian propane to international markets.

The proposed Trigon facility differs from existing export systems because it would operate as an independent terminal rather than controlling the entire supply chain. This would increase competition, provide producers and customers with more logistics options, and create a more resilient and efficient LPG export network. The project would also use existing infrastructure and a brownfield site, reducing capital costs and potentially offering lower handling fees than competing terminals in Canada and the U.S. Gulf Coast.

1.6.2 Supports Long-Term Canadian LPG Export Opportunities in Response to Growing Global LPG Demand

Global LPG demand is expected to grow significantly through 2035, driven primarily by Asia-Pacific markets, which account for nearly half of global consumption. China, Japan, South Korea, and increasingly India are major importers of LPG.

Canada is well positioned to benefit from this growth because:

- Asian buyers are increasingly sourcing propane from North America rather than the Middle East.
- Canada already supplies meaningful shares of the Japanese, Korean, and Chinese LPG markets.
- Shipping distances from Canada's West Coast to Asia are roughly half those from the U.S. Gulf Coast, providing a transportation cost advantage.
- Ongoing Panama Canal congestion and geopolitical instability in the Middle East are expected to strengthen demand for Canadian exports.

1.6.3 Unlocking Global Value: Canadian LPG and Export Diversification

The project aligns with Canada's goal of reducing dependence on U.S. markets by expanding access to global customers. Historically, most Canadian LPG exports were sold to the United States, exposing producers to lower prices and market concentration risks.

Additional export capacity would:

- Increase access to premium Asian markets.
- Improve price realization for Canadian producers.

- Capture more value from Canadian resources.
- Reduce reliance on a single export destination.
- Strengthen Canada's position as a reliable global energy supplier.

1.6.4 Building a More Competitive and Resilient LPG Export Sector

West Coast LPG export infrastructure is currently concentrated among a limited number of operators. A new independent export terminal would:

- Increase competition.
- Improve producer access to international markets.
- Enhance bargaining power and commercial flexibility.
- Reduce bottlenecks and capacity constraints.
- Lower systemic risk by creating multiple export pathways.
- Improve Canada's credibility with international buyers seeking reliable long-term supply.

1.6.5 Provides employment and Economic Benefits that support Canada's Economic Growth Objectives

The project is expected to create substantial economic benefits:

- Up to 250 jobs during peak construction, including skilled trades, engineering, project management, and service-sector positions.
- Approximately 40 permanent operational jobs once the facility is running.
- Additional indirect employment and economic activity in transportation, rail, trucking, equipment supply, logistics, and regional support industries.

1.7 Alternative Means of Carrying Out the Project

- **Phased or Modular Scale:** Building a smaller initial facility (e.g., direct rail-to-ship transloading) was rejected due to reduced operational efficiencies and higher unit costs. A reduced storage plan below federal thresholds was also discarded because market demand requires large, dual storage volumes for both propane and butane to insulate the supply chain from rail and marine shipping disruptions.
- **Pipeline Connection vs. Rail:** Building a direct pipeline from the Western Canadian Sedimentary Basin was deemed economically unviable due to prohibitive capital costs and prolonged regulatory timelines. Rail delivery remains the optimal approach.
- **On-Site Spatial Locations:** Trigon evaluated multiple locations on its leasehold, including "Area A" and a 35-acre site north of the existing coal yard. Yard 4 was chosen because it maximizes existing space with the lowest CAPEX, whereas Area A would require extensive grading and extra rail infrastructure.

1.8 Alternatives to the Project

- **Relying on Existing Pathways:** Leaving infrastructure as-is traps Canadian producers within monopolistic commercial terms on the West Coast or forces them to accept steep price discounts in the U.S. market.
- **The “No-Project” Alternative:** Fails to support Canada's export diversification policy, leaves a projected 110,000 barrel-per-day capacity shortfall unaddressed, and eliminates the regional economic benefits.

1.9 Engagement

1.9.1 Indigenous Engagement

Trigon has been engaging with six Tsimshian communities on the project since January 2024. Details of the engagement are provided in Section 5.

Key concerns raised during consultation, anonymized and generalized, include:

- **Traffic along rail corridor:** concerns were raised about cumulative impacts resulting from the increasing traffic volumes along the rail corridor between Prince Rupert and Smithers resulting from overall growth at the Port. Trigon is open to working with new or existing regional initiatives such as the North Coast rail forum to address cumulative effects of rail outside of Trigon's care and control.
- **Shipping concerns:** concerns were raised about cumulative impacts to marine mammals as well as fishing and harvesting opportunities from increasing shipping volumes in and around Prince Rupert resulting from growth at the Port. Trigon is open to working with the Transport Canada's Cumulative Effects of Marine Shipping Assessment and/or PRPA's cumulative effects framework to address the cumulative effects of shipping in Port waters.
- **Safety concerns:** safety concerns were raised at both land and sea owing to the cumulative increase in rail and shipping traffic and increasing volume of transportation of dangerous goods in and out of the PRPA.
- **CO₂ emissions:** Nations have expressed interest in the project having the best GHG performance practicable, acknowledging the limited grid power available in Prince Rupert at this time.

1.9.2 Industry Engagement

Trigon has been discussing the project with Canadian LPG producers and offtakers in Asia since 2022. The project is being advanced in response to a strong desire from Canadian LPG producers and offtakers in Asia for a competitive alternative to existing LPG export infrastructure, in addition to the need for more LPG export capacity on Canada's west Coast. An offtake partner has signed an agreement committing to a significant portion of Trigon's export capacity. No substantive issues or concerns have been raised to date.



1.9.3 Public and Stakeholder Engagement

Trigon has publicly shared information on the project via social media, public presentations, and conferences. No substantive issues or concerns have been raised to date. A public and stakeholder engagement plan has been prepared that will commence following the initiation of the IAAC regulatory process. Trigon looks forward to sharing information about the project and receiving feedback from the public and stakeholders through face-to-face interactions, digital platforms, and open houses.

1.10 Support for the Project

1.10.1 Support from Community and Industry

Based on initial engagement with local communities, the Project has received support from the City of Prince Rupert, the District of Port Edward, the International Longshore and Warehouse Union Local 523 (ILWU523), the International Longshore and Warehouse Union Canada (ILWU Canada), as well as a number of Canadian propane producers, and offtakers in Japan.

1.10.2 Support From Indigenous Communities

While Trigon will undertake full and comprehensive engagement and consultation with the Coast Tsimshian Nations, as equity owners and partners, the economic development representatives of the Lax Kw'alaams Band and Metlakatla First Nation have indicated their support for Trigon's proposed LPG Export Project.

2 Description of the Project

2.1 Project Scope

The Project will be optimized to overcome known design and operational challenges of existing LPG export facilities in Canada. The major components of the project scope are shown below in Table 3-1.

Description	Design Basis
Product	LPG
Annual Throughput Capacity	30M barrels/annum (2.4 million metric tonnes per year); which averages ~80,000 B/D
New Rail	A limited amount of new rail required all on Trigon lease land
Rail Operations	Unit train receiving and handling on Trigon lease land
Rail Offloading	Up to 20 offload stations
Total Storage	≤158,000 m ³
Refrigerated Tank Type	Fully Contained Concrete Tank or five accumulator storage tanks
Berth and Vessel Loading	Tie into Trigon's existing berth one and use of existing piping and loading arms
In Water Works	Not applicable – there will be no work in or above water
Facility Processing Power	Gas Drive ²
Power Availability	Existing Trigon substation
Quantitative Risk Assessment (QRA)	The QRA for the facility is expected to remain within Trigon controlled fence line

Table 3-1: Project Scope

2.2 Phased Approach

A phased approach will be adopted whereby ~95,000m³ of storage will be built as the initial phase. Final investment decision on the second phase (63,000m³ of storage) will be made in response to market demand.

2.3 Project Components and Activities

All new equipment and facilities required for the Project will be located on Trigon lease land and within the existing terminal footprint.

² With optionality to convert to electric drive when sufficient power available from BC Hydro.

2.3.1 Project Components

The Project will include the following components:

New Project Infrastructure

- One new rail track within the Trigon railyard;
- Up to twenty unloading racks and roof;
- Storage bullets (~8,000m³);
- LPG cooling equipment;
- LPG pre-treatment equipment (de-ethanizer, methanol removal, water removal);
- Boil off gas recovery system;
- Refrigerated storage tank(s) (~150,000m³), or five accumulator storage tanks (30,000m³ each);
- Piping from the tank to the intertie point with existing berth piping;
- Enclosed ground flare;
- Process control and safety systems;
- Nitrogen and instrument air systems;
- Fire water system;
- Electrical house, PNG natural gas connection;
- Control room, roads and car parking.

Existing Shared Project Infrastructure with Trigon Operating Facility (no construction necessary)

- Existing railyard;
- Berth one;
- Liquid loading and vapour return lines;
- Administration building, and sanitary waste disposal (shared use);
- Warehouse and maintenance shop;
- Loading arms on berth one to offload LPG to the VLGCs;
- Trigon substation;
- Stormwater management system.

2.3.2 Project Activities Overview

The Project includes the following activities:

Construction:

The project is estimated to require approximately 400 person years of construction activity.

- Site preparation and existing coal yard site optimization;
- Construction of the rail track;
- Connection to the BC Hydro grid;
- Installation of unloading racks;
- Installation of piping to the intertie point on the berth;
- Installation of the LPG storage tank and bullets;



- Installation of refrigeration equipment and facility process modules;
- Installation of utilities, including electrical power and fire protection;
- Post construction clean-up;
- Facility commissioning;

Operations:

- Receiving and unloading LPG from CN trains;
- LPG pre-treatment and refrigeration process;
- Storing LPG;
- Terminal and vessel handling operations required for loading third party LPG carriers for export;
- Full-time direct employment for approximately 40 people and is expected to operate 24 hours per day, 365 days per year.

Decommissioning:

- Removal of land-based above-ground infrastructure on the Trigon site;
- Decommissioning of infrastructure on the jetty.

2.4 Project Schedule

The Project is expected to operate for at least 50 years. The Project milestone schedule is presented in Table 3-2:

Project Phase	Timing
Regulatory and Permitting	Q2 2026 – Q3 2027
Engineering	Q2 2027 – Q3 2028
Construction	Q4 2028 – Q4 2031
Start of Operations	Q4 2031
Decommissioning	2081 or later

Table 3-2: Project Schedule

3 Past Studies, Land Use and Regulatory Overview

3.1 Past Studies

Ridley Island and the Port of Prince Rupert have been the subject of numerous environmental studies, assessments, planning initiatives, and environmental monitoring that are all publicly available. The Project Description is a compilation of a number of these reports, including but not limited to the following:

- Ridley Island Master Development Plan (2008);
- PRPA 2020 Land Use Management Plan, Updated (2021);
- Canpotex Potash Terminal Project (2011);
- AltaGas Ridley Island Propane Export Terminal Project (2016);
- Pacific North Coast Integrated Management Area (DFO 2016);
- Vopak Pacific Canada Bulk Liquids Export Terminal Project (2018);
- Pacific Northwest LNG Project (2016).
- Trigon – Wildlife Habitat Survey and Bat Emergence Survey (2025)

There are no regional assessments carried out under the IAA that Trigon is aware of that are relevant to the Project. Strategic Assessment of Climate Change developed by ECCC is relevant to the Project.

3.2 Land Use Designation

Under PRPA's Updated 2020 Land Use Management Plan, the Project footprint is entirely situated in areas zoned for industrial development and which are currently being used for the purpose of coal receiving, storing, and exporting metallurgical and thermal coal (PRPA 2021).

3.3 Federal Financial Support

No federal financial support is required for the project.

3.4 Regulatory Framework

The Project will be supported by an established and robust regulatory framework for the safe storage and transport of LPG in Canada, as well as the safety and environmental regulatory framework of the Prince Rupert Port Authority. Collective oversight and safe passage of vessels travelling through PRPA waters is ensured by a coordinated effort between the Canadian Coast Guard's Marine Communications and Traffic Services, the Pacific Pilotage Authority, BC Coast Pilots, SAAM Towage Canada, the Western Canada Marine Response Corporation, the Canada Border Services Agency, and the Prince Rupert Port Authority. Trigon will also work with PRPA's Emergency Operations Center to ensure effective response in the event of a spill.

The Project is a 'Designated Project' under the IAA's (2019) Physical Activities Regulations. Since the Project is being entirely developed on a brownfield site using existing infrastructure, its impacts are expected to be localized with no significant effects anticipated. As such, the environmental aspects of

the Project are expected to be assessed by the Impact Assessment Agency of Canada under the *Impact Assessment Act* (IAA 2019).

The following is a preliminary list of federal legislation, regulation, policy, and guidance that may be relevant to the Project:

- *Impact Assessment Act* (2019);
- Port Authority Operations Regulations (PRPA);
- *Railway Safety Act* (1985);
- Transportation of Dangerous Goods Regulations in Canada (1992);
- Transportation of Dangerous Goods by Rail Security Regulations (2019);
- *Canadian Environmental Protection Act* 1999 (CEPA);
- Technical Safety BC: Boiler and Pressure Vessel Registration (Provincial).

3.4.1 Federal Regulations

3.4.1.1 Impact Assessment Act

The Project is a designated project under IAA 2019's "Physical Activities Regulations" as the storage volume exceeds the criteria set out in Section 37(f) of the regulations: "the construction, operation, decommissioning and abandonment of a new natural gas liquids storage facility with a storage capacity of 100,000 m³ or more."

3.4.2 Provincial Regulations

3.4.2.1 British Columbia Environment Assessment Act

Trigon is located on Ridley Island, which is federal land subject to federal legislation.

4 Environmental Overview

The Project will be built on a brownfield site currently used for coal storage and handling. No new environmental footprint is required for the Project, and no in-water works are required.

4.1 Project Environmental Setting Summary

Climate: The project site is located in a temperate rainforest with a maritime climate. It experiences moderate temperatures, ranging annually from approximately 2°C to 14°C (averaging 12°C–13°C in summer and 2.4°C in January). Rainfall is high, averaging about 2,620 millimeters annually, with the wettest months occurring between October and April.

Air Quality: The Prince Rupert airshed has good air quality due to consistent coastal winds, few industrial emission sources, and its remote location. Air contaminants from shipping emissions (such as sulphur dioxide, nitrogen dioxide, and particulate matter) have significantly decreased recently due to international marine emission controls. The local port authority (PRPA) monitors air quality daily.

Noise and Vibration: The closest residential area or noise-sensitive receptors are located about 2 kilometers away in Port Edward, across Porpoise Harbour. The current background noise and vibration in this area are influenced by existing industrial operations on Ridley Island, which include ships, trains/cargo movement, heavy vehicles, and machinery.

Light: Current night lighting at the site is required for safety and operations (using high and low mast lights). This light is currently not highly visible, or has limited visibility, from Port Edward.

Terrain and Ground Conditions: The project is situated on a flat, previously developed ("brownfield") site made of engineered fill (rock and soil) a few meters above sea level. The surrounding natural landscape consists of poorly drained organic soils (peat and muck), silt/clay layer, and bedrock made of weathered rock (metasedimentary schists).

4.2 Project Social and Economic Background Summary

Indigenous and Local Communities: The Project is located within the traditional territory of the Coast Tsimshian Peoples, inside the North Coast Regional District (NCRD) on the northern coast of British Columbia.

- Port Edward: The closest community, located about 2.5 km east of the site across Porpoise Bay. It has a population of approximately 470 residents, an elementary school (K–5), and a community centre.
- Prince Rupert: The nearest major urban centre, located 5 km north of Port Edward.

Population and Economic Trends: Between 2011 and 2021, the regional district's population decreased by 3.2%. During this time, the local economy shifted away from traditional industries like forestry, fishing, and hunting toward transportation and warehousing.

Economy and Key Industries:

- Prince Rupert: Driven by transportation/warehousing, retail, healthcare, education, and public administration.
- Port Edward: Supported by public administration, accommodation/food services, retail, construction, and transportation/warehousing.
- Port Operations: The Prince Rupert Port Authority (PRPA) and its terminal tenants (including Trigon Pacific, Fairview, Prince Rupert Grain, Watson Island Bulk, and others) are vital drivers of the local economy.

Emergency and Health Services: Healthcare: The region is served by the Northern Health Authority. The nearest hospital is the Prince Rupert Regional Hospital, with major medical transfers sent to Prince George.

- First Responders: Core emergency services are based in Prince Rupert, including the BC Ambulance Service, Prince Rupert Fire Rescue, and the RCMP. Port Edward relies on a volunteer fire department backed by a mutual aid agreement with Prince Rupert.
- Marine & Port Security: Additional marine safety and emergency support are provided by the Canadian Coast Guard, Pacific Pilotage Authority, BC Coast Pilots, SMIT Marine, and the PRPA.

5 Indigenous Peoples and Traditional Land Use

5.1 Overview

The Project sits within the territories of the following Indigenous Nations:

- Gitxaala Nation;
- Gitga'at First Nation;
- Kitselas First Nation;
- Kitsumkalum First Nation;
- Lax Kw'alaams Band;
- Metlakatla First Nation.

The most proximal reserves to the Project are ~5km and ~8.5km away.

Trigon is committed to ensuring these local Indigenous Nations have a direct voice and active involvement in the Project. Feedback gathered during ongoing engagement will be used to shape the final Project scope and inform the federal Impact Assessment process.

5.2 Consultation and Engagement

Trigon has engaged with the aforementioned Indigenous Nations on the Project since January 2024. Documents shared for review and feedback include:

- Draft Project Description (issued January 14, 2024)
- Draft Terms of Reference for an environmental effects assessment (February 29, 2024)
- Draft Environmental Effects Assessment (June 26, 2024).
- Wildlife Surveys (July-October 2024).
- Archaeological Overview Assessment, results verbally shared (December 2024)
- Updated Draft Project Description (May 2026)

In addition, updates have been held bilaterally with each Nation bi-weekly or monthly where project updates and feedback are shared. These meetings continue today and will continue for the life of the project.

Trigon has documented all feedback from each Nation and updated the Project and/or project documentation where appropriate. Capacity funding has been provided and will continue to be provided to support the continued engagement by each Nation on the project.

5.3 Key Issues Raised

A complete record of consultation can be provided at IAAC's request. Key concerns raised during consultation, anonymized and generalized, include:

- Traffic along rail corridor: concerns were raised about cumulative impacts resulting from the increasing traffic volumes along the rail corridor between Prince Rupert and Smithers resulting

from overall growth at the Port. Trigon is open to working with new or existing regional initiatives such as the North Coast rail forum to address cumulative effects of rail outside of Trigon's care and control.

- Shipping concerns: concerns were raised about cumulative impacts to marine mammals as well as fishing and harvesting opportunities from increasing shipping volumes in and around Prince Rupert resulting from growth at the Port. Trigon is open to working with the Transport Canada's Cumulative Effects of Marine Shipping Assessment and/or PRPA's cumulative effects framework to address the cumulative effects of shipping in Port waters.
- Safety concerns: safety concerns were raised at both land and sea owing to the cumulative increase in rail and shipping traffic and increasing volume of transportation of dangerous goods in and out of the PRPA.
- CO₂ emissions: Nations have expressed interest in the project having the best GHG performance practicable, acknowledging the limited grid power available in Prince Rupert at this time.

Additional engagement dialogue:

- Questions about workforce participation and opportunities for Nation members. Trigon committed to working with Nations to identify employment, training, and procurement opportunities.
- Consideration to the potential effects on community health and services: Trigon has communicated that it will work with local community health and service providers to identify how to avoid and/or minimize impacts. For example: Trigon will provide a workcamp to avoid impacts to hotel and housing.
- Concerns raised about accidents and malfunctions: Trigon has added an accidents and malfunctions section to this IPD to address interests raised by Nations with regards to accidents and malfunctions.
- Questions about scope of EA, specifically around inclusion of rail and shipping. Trigon has communicated that Trigon will not be the owner of the product, or rail or marine shipper. Rail is regulated by the *Railway Act* and in accordance with Transportation of Dangerous Goods legislation and is out of Trigon's care and control. Similarly, shipping will be provided by third party shippers who must be compliant with all Canadian legislation as well as rules set forth by the PRPA and the Canadian Marine Pilots Association.
- Concerns raised about potential impacts to Indigenous rights and interests. A summary of potential impacts to Indigenous rights and interest from the Project is provided below. Trigon has communicated that as the project is being built on a brownfield site on land leased from PRPA that has excluded public and Indigenous rights from being practiced for several decades, Trigon believes that impacts to Indigenous rights and interests will be limited.
- Questions about the geographic and temporal scope of the project. In response to questions raised, Trigon has provided additional details on proposed local and regional study area boundaries herein.

- Questions related to expansion: Since the first version of the project description was circulated to Nations in 2024, the market has shifted and suggests higher than previously LPG export volumes. As such, Trigon has increased the proposed storage capacity of the facility and adopted a phased approach to expansions where the whole project is included up front and assessed in the impact assessment.

5.4 Potential Changes Affecting Indigenous Interests

Access for the use of land or resources on the Project site for exercise and practice of Indigenous rights has been restricted since 1982 when Ridley Terminals Inc. was established. Access to the island continues to be restricted by PRPA. Trigon understands that access to marine resources in proximity to the island remains available. The Impact Assessment will identify and assess potential changes caused by the Project that could affect Indigenous interests.

Given the long history of restricted access to Ridley Island, Section 35 rights are not expected to be materially impacted by the project, however, it is noted that associated rail movement and shipping may affect those rights. Managing those impacts is out of the care and control of Trigon and are best addressed by the Transport Canada, PRPA, CN Rail, and shippers. Trigon is aware that Transport Canada has been working on a Cumulative Effects of marine Shipping Assessment for the region as well as hosting rail forums with the Nations since 2023 to address Indigenous concerns around rail movement. In addition, PRPA is initiating a cumulative effect management framework to consider rail, shipping, and other cumulative environmental concerns. Trigon is open to participating in each of those forums.

5.4.1 Impact to Indigenous health, social, economics

Trigon is engaging with the Tsimshian Nations to determine the potential impacts to health, social, and economic conditions that may arise from project development. Trigon believes that the project can provide an overall positive benefit to Indigenous Peoples, particularly regarding economic opportunities and the associated outcomes arising from procurement, employment and training opportunities. Potential impacts will be assessed in the Impact Statement and may include:

- Human health considerations related to emissions (including effluent, air quality, and noise);
- Changes to community well-being;
- Contributions to cumulative effects already being experienced in the region; and

These potential effects will be determined through ongoing engagement activities and the environmental approvals process. Indigenous Knowledge will be considered in the impact assessment if provided by the Nations.

5.4.2 Preliminary Assessment of Potential Impacts to Indigenous Groups Resulting from Project Activities

This section will be further informed by input from Indigenous Groups during the Early Engagement Phase.

The following is a preliminary assessment of potential impacts to Indigenous Groups including rights and title, current use of land and resources for traditional purposes, heritage resources, health, and socioeconomic impacts as a result of carrying out the Project.

The potential effects identified in Table 6.1 below apply to all Project phases and activities, including construction and operations. Further understanding of these impacts is expected to result from consultation and engagement with Indigenous Groups throughout the assessment process. Mitigation measures and appropriate management plans will be developed based on comments received from Indigenous Groups through the EA process.

Table 6.1: Preliminary Assessment of Potential Impacts to Indigenous Groups Resulting from Project Activities

Category	Potential Effects
Established or asserted Indigenous rights, title, and other interests	Change in sense of place and cultural continuity due to changes in accessibility and environmental quality
Current use of land and resources for traditional purposes	None expected
Health and socio-economic conditions	Sensory disturbance due to increased noise and light levels Decrease in air quality due to air emissions during operations and dust during construction Potential safety risks due to increased traffic and industrial activities Change in sense of place and cultural continuity Increase in employment, training and contracting opportunities
Physical and cultural heritage, including any structure, site or thing that is of historical, archaeological, paleontological, or architectural significance	None expected

6 Potential Project Effects

An overview of potential project effects is provided in Table 7-1 below. More detailed analysis of potential effects and mitigations will be developed during the Environmental Effects Evaluation, and as design of the Project and engagement with Indigenous Nations and stakeholders progresses.

Topic	Construction	Operation
Atmospheric Environment	Ground disturbance and dust from construction will result in reduced air quality. Trucks and construction equipment will result in increased greenhouse gas (GHG) emissions and criteria air contaminants (CAC). Noise and/or light disturbance from construction activities to Port Edward residents and other sensitive receptors (e.g. marine and land-based wildlife).	Operation of the facility and flaring will result in reduced air quality and increased GHG emissions.
Terrestrial Environment	None. Project uses existing infrastructure.	None. Project uses existing infrastructure.
Marine Environment	None. Project uses existing infrastructure. No pollution to boundary waters, or interprovincial waters, or international waters, or the marine environment outside of Canada is anticipated to result from the Project.	Noise from additional vessels. No pollution to boundary waters, or interprovincial waters, or international waters, or the marine environment outside of Canada is anticipated to result from the Project.
Fish and Fish Habitat	None. Project uses existing infrastructure. No in-water works or works above water are required.	Noise from additional LPG vessels
Aquatic Species	None. Project uses existing infrastructure. No in-water works or works above water are required.	Noise from additional LPG vessels
Migratory Birds	Noise, vibration, and light from construction activities could disrupt normal behaviour. Collision risk possible in low visibility conditions.	Flaring risk (an enclosed ground flare has been selected to minimize this concern), artificial lighting could disorient birds, collision risk with infrastructure, noise and human activity disturbance.
Social and Economic Environment	Creation of construction jobs and local investment.	Increase local jobs
Indigenous Peoples	Project is not expected to have impact on Indigenous lands and rights.	Project is not expected to have impact on Indigenous lands and rights.
Federal Lands	No change in federal land use or access. Some impact to air emissions.	No change in federal land use or access. Some impact to air emissions.

Topic	Construction	Operation
	Cumulative impacts of increasing industrialization of Ridley Island.	
Accidents and Malfunctions	Spills could impact health if waters are impacted	

Table 7-1: Potential Effects of the Project During Construction and Operation Phases

6.1 Anticipated Project Emissions

6.1.1 Construction Phase

Trigon anticipates the following types of emissions during the construction phase of the Project:

- **Air emissions:** from construction equipment used during site preparation, and construction. Project sources will emit particulate matter, nitrogen oxides, sulphur oxides, carbon monoxide, volatile organic compounds, and GHGs.
- **Stormwater runoff:** runoff and drainage from precipitation events will be managed through existing erosion and sediment control measures, ensuring water quality meets guidelines prior to discharge to the environment.
- **Sanitary Wastewater:** will result from grey water and sewage from sanitary facilities on site. Sanitary wastewater will be disposed of using existing facilities on site.
- **Light:** from construction equipment, machines and vehicles, and security lighting.
- **Noise:** from construction equipment, machines, and vehicles.
- **Waste soils and cleared vegetation:** None. No new land clearing. Project uses existing infrastructure.
- **Solid waste:** from construction materials (e.g. packaging, lumber, paper, metals).
- **Hazardous waste:** such as batteries, oil filters, solvents and used oil from construction equipment, machines, and vehicles.

6.1.2 Operations Phase

Trigon anticipates the following emissions during the operations phase of the Project:

- **Air emissions:** operation sources such as trains, vehicles, vessels and HVAC will emit particulate matter, nitrogen oxides, sulphur oxides, carbon monoxide, volatile organic compounds, and GHGs.
- **Stormwater:** drainage systems will collect and dispose of stormwater using existing facilities.
- **Sanitary Wastewater:** from grey water and sewage from existing sanitary facilities on site.
- **Light:** from office lighting, train, vehicle and yard operations, and safety and security lighting. Little new lighting will be required for the project.
- **Noise:** from train movements, vehicles, and compressors.
- **Solid waste:** from packaging, food waste, scrap lumber, and office paper. Will be managed using existing facilities.

- **Hazardous waste:** from used oil and solvents, used cleaning materials, machinery, equipment, and vehicles. Will be managed using existing off-site facilities.

6.2 GHG Estimate

6.2.1 Overview

The Project will generate greenhouse gas (GHG) emissions primarily from combustion-related sources associated with process operations. The principal GHG emitted is carbon dioxide (CO₂), arising from flaring, power generation, and gas compression systems.

The estimated total direct CO₂ emissions from the Project are approximately 789.3 kilotonnes per year (kt CO₂/year). A Pre-FEED level emission estimate review was completed by Enerflex in March 2024 and forms the basis of this summary.

6.3 Accidents and Malfunctions

The Impact Statement will describe potential accidents and malfunctions that may occur in connection with the Project, including credible worst-case scenarios, the potential effects of such events on the environment, health, social and economic conditions, and the measures proposed to avoid, mitigate, and respond to such incidents.

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