



July 24, 2026

Sent by email

Emily Leung

Trigon Pacific LPG

Impact Assessment Agency of Canada - Government of Canada

Emily.Leung@iaac-aeic.gc.ca**Subject: Natural Resources Canada's submission to the Federal Authorities Advice Record for the Initial Project Description for the Trigon Pacific LPG Project**

Dear Emily,

Please accept the following in response to Impact Assessment Agency of Canada's June 24, 2026, request for review of the Initial Project Description (IPD) for the Trigon Pacific LPG Project. Natural Resources Canada (NRCan) has reviewed the document in relation to its mandate and areas of expertise in seismic hazard assessment, economic analysis of project impacts, as well as expertise related to the five Calls for Justice on Resource Development from Final Report of the National Inquiry into Missing and Murdered Indigenous Women, Girls and 2SLGBTQIA+ People (MMIWG2S+ CfJs 13.1-13.5) and Shared Priorities Action Plan Measure 12 on safe and equitable resource development under the *United Nations on the Rights of Indigenous Peoples Act* Action Plan (UNDA SP12). NRCan has reviewed the documentation and provided comments in the Attachment, Federal Authority Advice Record (FAAR).

Furthermore, the Proponent should be made aware of the [Open Science and Data Platform](#) (OSDP), a centralized data hub led by Natural Resources Canada that provides access to diverse science, data and regulatory information to support the assessment. The OSDP can help guide the Proponent in early planning and align project proposals with regulatory expectations to contribute to more efficient reviews. For example, the dataset, [British Columbia Seabird Colony Inventory](#), produced by Environment and Climate Change Canada may be of interest to the Proponent. NRCan is available to meet and provide more details about what the OSDP has to offer and can be contacted at osdp-psdo@nrcan-rncan.gc.ca.

If you have any questions regarding our submission, please do not hesitate to contact me at alice.tremblay@nrcan-rncan.gc.ca.

Sincerely,

Alice Tremblay

Senior Environmental Assessment Officer, Impact Assessment Division, NRCan

Cc: Christina Clarke – Acting Director, Impact Assessment Division, NRCan

Attachment(s): [Federal Authority Advice Record for the Trigon Pacific LPG Project](#)

Federal Authority Advice Record (FAAR)**FAAR Response must be submitted by July 24, 2026**

Trigon Pacific LPG Project – Trigon Pacific Terminals Ltd.

Registry File: 90557

Department/Agency	Natural Resources Canada
Lead Contact	Alice Tremblay
Full Address	580 Booth, Ottawa, Ontario
Email	Alice.tremblay@nrcan-rncan.gc.ca
Telephone	N/A
Alternate Contact	Christina Clarke (christina.clarke@nrcan-rncan.gc.ca)

1. Will your department or agency exercise a **power, perform a duty or function**, or provide **financial assistance**, related to the project to enable it to be carried out in whole or in part?

As relevant,

- a) Specify the power, duty or function, or financial assistance, and the likelihood that it will be required to construct the project, based on the Initial Project Description, as either Required, Potential, Likely, Unlikely or Not Required

Based on the information provided to date, it is unlikely that the Project would warrant a license under the Explosives Act for storage and manufacturing of explosives. However, the Project will likely require an export license (issued by the Minister) to secure a final investment decision.

Both the Canada Energy Regulator and NRCAN have roles in the LPG export authorization process. The CER assesses whether proposed export volumes are surplus to reasonably foreseeable Canadian requirements, establishes the authorized volumes, duration and conditions, and monitors compliance through monthly reporting. The Minister is responsible for approving the issuance of a licence.

- b) Describe any associated Indigenous or public consultation, including timelines
Not applicable
- c) Describe any associated information requirements (e.g., alternative means assessment, habitat offsetting), and specify those that may be coordinated with the impact assessment process, if an impact assessment is required
Not applicable
- d) Identify any associated project-specific guidance or issues of which the proponent should be aware, or information the proponent should provide
- Final Report of the National Inquiry into Missing and Murdered Indigenous Women and Girls: [Final Report | MMIWG](#)

MMIWG2S+ Calls for Extractive and Development Industries (13.1-13.5)

13.1 We call upon all resource-extraction and development industries to consider the safety and security of Indigenous women, girls, and 2SLGBTQIA people, as well as their equitable benefit from development, at all stages of project planning, assessment, implementation, management, and monitoring.

13.2 We call upon all governments and bodies mandated to evaluate, approve, and/or monitor development projects to complete gender-based socio-economic impact assessments on all proposed projects as part of their decision making and ongoing monitoring of projects. Project proposals must include provisions and plans to mitigate risks and impacts identified in the impact assessments prior to being approved.

13.3 We call upon all parties involved in the negotiations of impact-benefit agreements related to resource-extraction and development projects to include provisions that address the impacts of projects on the safety and security of Indigenous women, girls, and 2SLGBTQQIA people. Provisions must also be included to ensure that Indigenous women and 2SLGBTQQIA people equitably benefit from the projects.

13.4 We call upon the federal, provincial, and territorial governments to fund further inquiries and studies in order to better understand the relationship between resource extraction and other development projects and violence against Indigenous women, girls, and 2SLGBTQQIA people. At a minimum, we support the call of Indigenous women and leaders for a public inquiry into the sexual violence and racism at hydroelectric projects in northern Manitoba.

13.5 We call upon resource-extraction and development industries and all governments and service providers to anticipate and recognize increased demand on social infrastructure because of development projects and resource extraction, and for mitigation measures to be identified as part of the planning and approval process. Social infrastructure must be expanded and service capacity built to meet the anticipated needs of the host communities in advance of the start of projects. This includes but is not limited to ensuring that policing, social services, and health services are adequately staffed and resourced.

- United Nations Declaration on the Rights of Indigenous Peoples Act Action Plan 2023-2028: [The Action Plan](#)

UN Declaration Act Action Plan Shared Priorities Measure 12 (UNDA SP12)

Partner with Indigenous communities and organizations, industry, other federal departments and provinces and territories to develop and implement a strategy to:

- *Increase safety and security of Indigenous women, girls and 2SLGBTQI+ people at all stages of resource project development*
- *Empower Indigenous women, girls and 2SLGBTQI+ people to influence and equitably benefit from resource development through increased participation across disciplines and occupations, leadership positions and throughout the supply chain*
- *Partner and path find with other federal departments to identify whole of government responses to mitigate the impacts of resource development projects on Indigenous women, girls and 2SLGBTQI+ peoples.*

- e) Indicate whether your department or agency has identified any power that it will not be exercising or may not be able to exercise to allow the project to be carried out, in whole or in part.

Not applicable

2. **Using Table 1**, identify project- and context- specific **key issues**, based on the expertise within your mandate¹ and the information in your possession, including the Initial Project Description, any exchanges with the proponent or others related to the project and known means to address the effects of the project. For each key issue:

- Specify the key issue (e.g., specific species and location)
- Specify the project component or activity linked to the key issue
- Explain why it's a key issue based on:
 - biophysical effect pathway(s) from the specific project component or activity
 - concern unique to the project or a priority within your mandate
 - the issue being material² to decision making under the *Impact Assessment Act*
- Identify how the issue could be resolved, including through means other than an impact assessment
- Identify additional information the proponent could provide including to give confidence on how the issue can be addressed through other means.

¹ Refer to the [Memoranda of Understanding with IAAC](#).

² An issue is material to decision making if its analysis is anticipated to affect the conclusions on (1) whether adverse effects within federal jurisdiction or direct and incidental adverse effects (collectively adverse federal effects) are likely not significant, or of low, medium or high significance; (2) appropriate mitigation measures for significant adverse federal effects; or (3) justification in the public interest.

**Alice Tremblay, Senior Impact
Assessment Officer, NRCan**

Name and Title of Departmental /
Agency Responder

July 24, 2026

Date

Table 1: Key Issues to inform the impact assessment process

This table should outline key issues to inform the impact assessment process, including whether an impact assessment is required and, if so, the scope of the assessment and tailoring of the Tailored Impact Statement Guidelines.

Key issues are the major concerns directly related to a project component or activity, the analysis of which is anticipated to be material to decision-making under the *Impact Assessment Act*.

Federal authorities' advice should be guided by the identification and resolution of key issues. If an impact assessment is required, it will be focused on key issues.

Comment ID	a) Key issue	b) Project component or activity	c)(i) Biophysical effect pathway(s)	c)(ii) Concern unique to the project or a priority within your mandate	c)(iii) Material to federal decision-making	d) Means for issue resolution	e) Additional information from the proponent
<i>Identify comments by organization and comment number.</i> e.g., IAAC-01	<i>Specify the key issue (e.g., specific species and location).</i>	<i>Identify the project component or activity linked to the key issue.</i> <i>Be specific about the nature, scale, novelty and complexity or the component or activity.</i>	<i>Identify the specific biophysical effect pathway between the project component or activity and the affected environmental or human receptor (including Indigenous Peoples).</i>	<i>Describe why it's a key issue within the mandate of your department or agency, including in terms of priorities of the federal government and in terms of anticipated likelihood, severity or uncertainty of effects.</i> <i>Identify if the key issue is common for projects of this nature or in this sector, or whether it's unique to this project due to its complexity, size or novelty; a sensitive or rare receiving environment; and/or proximity of sensitive environmental or human receptors (including Indigenous Peoples).</i>	<i>Describe why the key issue is material to decision-making as either:</i> • <i>an adverse effect within federal jurisdiction, or a direct or incidental adverse effect, that may be significant based on available evidence including:</i> ○ <i>federal experts' knowledge and experience with past project assessments;</i> ○ <i>presence of sensitive species, habitats or human receptors (including Indigenous Peoples);</i> ○ <i>novel or complex project activities, components or technologies;</i> ○ <i>high uncertainties in effects or in the effectiveness of mitigation measures;</i> ○ <i>unknown or unproven mitigation; or</i> • <i>a factor for the justification in the public interest anticipated to be material to decision-making such as a likely positive effect contributing to sustainability, to Canada's environmental obligations or climate change commitments or in supporting governmental priorities, such as reconciliation with Indigenous Peoples.</i>	<i>Describe how the key issue could be resolved or addressed by:</i> • <i>Any means, including powers, duties, functions, frameworks, policies or guidance that your department or agency has;</i> • <i>Any means, including powers, duties, functions, frameworks, policies or guidance from another jurisdiction, including the province;</i> • <i>Common, proven, well-understood or standard mitigation measures to mitigate the effect or effect pathway(s); or</i> • <i>Commitments made by the proponent (e.g., in the Initial Project Description).</i>	<i>Describe information the proponent can provide, or commitments the proponent can make, in their Response to the Summary of Issues that would provide confidence that the issue can be resolved by existing means.</i> <i>Consider whether information, studies, analyses or collaborative work with other authorities would be required to address the issue beyond existing means.</i>
NRCan-01	Seismic hazard	Construction and operation of an LPG storage and transloading facility.	Accidents and malfunctions that may occur due to seismic activity in the region could result in impacts to human health, fish and fish habitat, as well as Indigenous Peoples.	NRCan possesses expertise in seismicity.	Assessment of earthquake hazard for the project and potential effects would help increase certainty in impact assessment predictions, as well as support the development of robust mitigation measures that can protect people and the environment.	NRCan looks forward to the earthquake hazard information and the use of the latest standards and codes as the project moves forward. Please note, the National Building Code Seismic Hazard Tool can be used to obtain seismic hazard design values for various editions of the National Building code. It is the responsibility of the proponent to determine the appropriate site class and which version of the seismic hazard tool is applicable to the Project's location at the time of design.	NRCan recommends that the proponent provide an earthquake hazard assessment that includes a description of local and regional faults, potential/expected ground shaking, earthquake sources, design and mitigation methods, etc. in the EIS. NRCan recommends including a discussion of potential effects from induced earthquakes in the region, if any.

						The proponent may wish to consult the following resources to advance their earthquake hazard assessment: 1) National Building Code of Canada Seismic Hazard Tool 2) Seismic Hazard Calculations	
NRCan-02	Potential increased safety risks / cumulative socio-economic impacts (MMIWG2S+, gender-based violence (GBV) and human trafficking) for Indigenous women, girls and 2SLGBTQIA+ people	Construction workforce, temporary accommodations/work camp and other temporary lodgings, increased port activity, increased economic activity in the region. Trigon has identified concerns raised through engagements with Indigenous Nations on the consideration of potential community health and services and is engaging with Tsimshian Nations to determine potential impacts to health, social and economic conditions. 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.	Workforce influxes, temporary workforce accommodations, and increased port and economic activity may increase demand on community services, alter community dynamics, increase risks related to MMIWG2S+, gender-based violence, harassment, exploitation and human trafficking affecting Indigenous women, girls and 2SLGBTQIA+ people.	The issue is directly relevant to MMIWG2S+ Calls for Justice 13.1-13.5 and UNDA SP12. Workforce influxes, temporary workforce accommodations and increased economic activity associated with large industrial and resource development projects have been identified through research and engagement, studies and inquiries including testimonies gathered through the National Inquiry into Missing and Murdered Indigenous Women, Girls as factors that may contribute to increased demand on housing, health, social and emergency services, changes to community dynamics, increased vulnerability to gender-based violence, harassment, sexual exploitation, and human trafficking affecting Indigenous women, girls and 2SLGBTQIA+ people. Workforce mobility, social isolation, substance use, workplace cultures, and limited community connection regarding factors that may contribute to these risks.	The proposed project may result in an adverse effect to Indigenous peoples and has implication on advancing federal reconciliation objectives. Concerns include: • Potential adverse effects on the health, safety, security and socio-economic conditions of Indigenous women, girls and 2SLGBTQIA+ people resulting from workforce influx, temporary worker accommodations, increased industrial activity and cumulative regional development pressures. The issue is material due to evidence identified by the National Inquiry into Missing and Murdered Indigenous Women and Girls and subsequent research and engagement demonstrating links between resource development activities, transient workforces and increased vulnerability to violence, exploitation and human trafficking. • The project is situated within a region where MMIWG2S+ concerns are longstanding, including Prince Rupert's location at the western terminus of the Highway of Tears and the presence of community-led organizations supporting families and survivors. The adequacy and effectiveness of mitigation measures are currently uncertain, as no project-specific commitments related to MMIWG2S+, gender-based violence prevention and human trafficking have been identified. • Uncertainty regarding the extent to which Project activities may contribute to existing vulnerabilities, place additional pressures on community systems, or interact with cumulative regional development. There is also uncertainty regarding whether currently proposed mitigation measures would adequately prevent or address gendered safety impacts. Analysis of this issue may influence conclusions regarding the significance of adverse effects, the adequacy of mitigation measures, monitoring requirements, and broader public interest considerations related to reconciliation and implementation of Calls for Justice 13.1-13.5.	Examples of promising practices and recommendations identified through engagement and research include: • Early engagement with leadership, matriarchs, aunties, elders and youth, MMIWG2S+ / Human Trafficking survivors and families from Indigenous Nations, community organizations, subject matter experts and others, to discuss safety concerns, share promising practices and gather recommendations. • Commitments to gender and cultural safety through publicly available, comprehensive safety plans. • Gender safety committee, with membership including: senior executives; community members from local Indigenous and non-Indigenous communities; local Indigenous Elders; and local/provincial government representatives to develop and oversee programming to prioritize gender safety and inclusion in the workplace, in worker accommodations and in the community. • MMIWG2S+ Guardians / Indigenous oversight and monitoring • Worker code of conduct, zero-tolerance harassment and discrimination policies extending to off-duty behaviour;	In collaboration with Transport Canada, Canada Border Services Agency, Royal Canadian Mounted Police and relevant authorities, discussions are required with Prince Rupert Port Authority on existing safety measures and conditions in place, to identify appropriate measures.

						• Mandatory in-person MMIWG2S+/GBV/human trafficking, culturally safe training, delivered by local Indigenous women or organizations; • Partnerships with local MMIWG2S+ / gender-based violence organizations monitoring and adaptive management; • Survivor-centered, independent reporting mechanisms for worker misconduct.	
NRCan-03	Economic conditions	Economic benefits including rail transportation to deliver LPG to the export terminal	Growth in propane exports could increase demand on existing rail networks, depending on available capacity and the timing of other freight movements. Additional rail traffic may also warrant consideration of safety, emergency response preparedness, cumulative transportation effects, and potential impacts on communities and Indigenous groups along the corridor.	The positive economic impact of LPG projects is a key issue within NRCan's mandate, as it directly supports the federal government's priorities related to economic growth, energy security, regional development, and reconciliation with Indigenous Peoples.	The positive economic impact of a LPG project is material to decision-making as a factor in the justification in the public interest under the <i>Impact Assessment Act</i>. Economic benefits, including employment, infrastructure investment, and local and Indigenous business opportunities, are often key to the long-term viability and acceptability of a project. These benefits can offset or contextualize potential adverse effects, provided they are transparently assessed and equitably distributed. As such, the economic dimension is integral to a balanced determination of whether a project is in the public interest.	The project is likely to require a broader social economic cost benefit analysis as it relies on rail transportation to deliver LPG to the export terminal, making rail availability and logistics important considerations for the project's viability and overall footprint.	NRCan recommends that the proponent provides further information on anticipated train volumes, available rail capacity, corridor impacts, and proposed mitigation measures. This information would support a more complete assessment of transportation-related effects and the project's broader economic rationale and benefits to Canada.
NRCan-04	Equitable distribution of project benefits	Procurement, employment and training opportunities Trigon is engaging with Tsimshian Nations on employment, training and procurement opportunities and has communicated that they believe the Project can provide an overall positive benefit to Indigenous peoples, particularly regarding economic opportunities and the associated outcomes.	Project benefits may be disproportionately captured by men or established businesses if barriers affecting Indigenous women and 2SLGBTQIA+ people are not considered. IPD lacks information on measures to ensure equitable benefits for Indigenous women and 2SLGBTQIA+ people.	This issue is directly relevant to MMIWG2S+ Calls for Justice 13.1-13.5 and UNDA SP12. The Project has the potential to generate employment, contracting, procurement, training and business development opportunities through project construction and operations. However, evidence from the National Inquiry into Missing and Murdered Indigenous Women and Girls, parliamentary studies and related research indicates that Indigenous women, Two-Spirit and gender-diverse people frequently experience barriers to participation in resource	• The Project has the potential to generate significant employment, procurement and business opportunities for Indigenous communities through Indigenous ownership, benefits agreements and procurement commitments. However, insufficient information has been provided regarding whether project benefits would be equitably accessible to Indigenous women, Two-Spirit and gender-diverse people. • The issue is material because differential access to economic opportunities may affect the extent to which positive project effects contribute to sustainability, socio-economic well-being and reconciliation. Indigenous women and gender-diverse people often face barriers to participation in resource development sectors, and without targeted measures there is uncertainty regarding whether benefits will be distributed equitably among community members.	Examples of promising practices and recommendations identified through engagement and research include: • Early engagement with leadership, matriarchs, aunties, elders and youth, MMIWG2S+ / Human Trafficking survivors and families from Indigenous Nations, community organizations, subject matter experts and others, to discuss priorities and concerns related to equitable benefits, share promising practices and gather recommendations. • Targeted recruitment for construction and operations. • Support for women-owned Indigenous businesses.	NRCan recommends that the proponent provides further information on targeted measures to ensure equitable distribution of project benefits.

				development sectors, including workplace discrimination, caregiving responsibilities, workplace safety concerns, transportation barriers, limited access to training opportunities and underrepresentation in higher-paying occupations and leadership positions. As a result, economic benefits associated with resource development activities are not always distributed equitably.	Without targeted measures, there is uncertainty regarding whether employment, procurement, contracting and business opportunities generated by the Project will be accessible to Indigenous women, Two-Spirit and gender-diverse people on an equitable basis. Analysis of this issue may influence conclusions regarding the magnitude of positive socio-economic effects, the Project's contribution to sustainability and reconciliation objectives, and broader public interest considerations under the <i>Impact Assessment Act</i>.	- Reporting on participation outcomes including gender-disaggregated data. - Childcare, transportation and training support. - Financial planning supports.	
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