

Emily Leung

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Submitted Via Email: emily.leung@iaac-aeic.gc.ca

July 24, 2026

Dear Emily,

Re: Trigon Pacific LPG Project Prince Rupert Port Authority - Federal Authority Advice Record ("FAAR")

Please find enclosed the Prince Rupert Port Authority's ("PRPA") Federal Authority Advice Record in relation to the proposed Trigon Pacific LPG Project.

PRPA is a federal authority under the *Impact Assessment Act* and has responsibilities under the *Canada Marine Act*, its Letters Patent, and associated regulatory instruments respecting the management and development of federal port lands and the operation of the Port of Prince Rupert. PRPA's expertise includes port planning and development, land-use management, marine and rail transportation infrastructure, navigation and marine safety, environmental stewardship, emergency preparedness, and operational management of a major Canadian port.

As reflected in the enclosed FAAR, PRPA has identified several matters that may be relevant to the exercise of its statutory powers and responsibilities in relation to the proposed project. In particular, PRPA has identified potential issues concerning land-use compatibility, operational compatibility, transportation infrastructure planning, environmental stewardship, navigation and marine safety, and the orderly development and management of federal port lands. PRPA has also identified potential concerns regarding the consistency of the proposed project with planning assumptions, land-use objectives and development initiatives that have informed the long-term management and development of the Port of Prince Rupert.

PRPA will continue to participate in the impact assessment process in its capacity as a federal authority and will continue to assess matters relating to its statutory mandate.

Should the Agency have any questions regarding the enclosed FAAR, please contact the undersigned.

Sincerely,

<via email>

Jack Smith
Dir, Env Planning and Compliance

Department/Agency	Prince Rupert Port Authority ("PRPA")
Lead Contact	Jack Smith - Director, Environmental Planning and Compliance
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Telephone	250-600-4968
Alternate Contact	Jo Gudmundson, projects@rupertport.com

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.

Power, Duty or Function	Classification
Authorization(s) under the <i>Port Authorities Operations Regulations</i> in respect of activities on port lands	Required
Exercise of PRPA's statutory land management and port management authorities under the <i>Canada Marine Act</i> and Letters Patent	Required
Indigenous engagement and consultation associated with the exercise of PRPA's statutory powers and regulatory functions	Required
Review of land-use compatibility with port planning objectives and authorized port uses	Likely
Review of operational compatibility, marine traffic, rail interface, navigation, safety and emergency-response considerations	Likely
Financial assistance	Not Required

b) Describe any associated Indigenous or public consultation, including timelines.

The Port of Prince Rupert is located within and adjacent to the traditional territories of multiple Indigenous Nations. PRPA maintains ongoing relationships and engagement processes with Indigenous Nations regarding port operations, environmental management, marine use, land-use planning, infrastructure development, cultural interests, and economic participation matters associated with activities occurring on federal port lands and waters.

If PRPA is required to exercise statutory powers or perform regulatory functions in relation to the proposed project, including authorizations under the *Port Authorities Operations Regulations*, decisions relating to the use and development of federal port lands, operational compatibility determinations, or other port-management functions, PRPA anticipates engaging with potentially affected Indigenous Nations regarding matters within its mandate. Such engagement may include information sharing, technical discussions, review of project design and operations, consideration of potential impacts on Indigenous interests, marine use and navigation, environmental stewardship, land-use compatibility, emergency preparedness, and opportunities for mitigation or accommodation where appropriate. Indigenous engagement would also extend beyond project-specific operational issues and include broader questions of port development, land-use compatibility, and future use of federal port lands.

PRPA anticipates that Indigenous engagement would occur concurrently with, and be informed by, the impact assessment process. The timing, scope, and depth of consultation would depend upon the nature of the authorization or decision under consideration, the information available at the relevant stage of the process, and the potential impacts associated with the proposed project. This engagement would occur through project planning, construction, and operations should the project proceed.

PRPA would also continue its engagement with local governments, port users, industry participants and other stakeholders where relevant to the exercise of its statutory responsibilities relating to port operations, safety, navigation, land-use planning, operational compatibility and the orderly development of the Port of Prince Rupert.

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.

To support the exercise of PRPA's statutory powers and regulatory functions, PRPA may require information relating to land-use compatibility, operational compatibility, port planning, marine and rail transportation infrastructure, navigation and marine safety, environmental management, emergency preparedness, security, and the orderly development and management of the Port of Prince Rupert. Such information may include, but is not limited to:

- (a) detailed engineering, construction and operational plans for the proposed LPG storage and transloading facility;
- (b) information concerning the project's consistency with existing and planned land uses within the Port of Prince Rupert;
- (c) information regarding the project's interaction with existing and foreseeable port operations, tenants, transportation infrastructure and marine services;
- (d) marine transportation, vessel traffic, navigation and berthing assessments;
- (e) rail transportation, logistics and supply-chain analyses, including anticipated rail movements and operational interfaces within the Port;
- (f) quantitative risk assessments, hazard studies, emergency response planning and consequence modelling associated with LPG handling, storage and export activities;
- (g) environmental management plans, including information respecting potential effects on terrestrial, marine and aquatic environments, mitigation measures, monitoring programs and environmental stewardship commitments;
- (h) information regarding impacts on Indigenous interests, marine use, land use and opportunities for mitigation and accommodation;
- (i) information concerning alternative project designs, layouts, operating procedures, locations, transportation arrangements, or other measures that may avoid, reduce or manage operational, safety, environmental or land-use conflicts;
- (j) information necessary to evaluate the compatibility of the project with PRPA's responsibilities respecting long-term port planning, land management, infrastructure utilization and the orderly development of federal port lands; and

- (k) information demonstrating the relationship between the proposed designated project and any previous project descriptions submitted in respect of the same lands, including clarification of project scope, storage capacity, operational configuration and the proponent's intended regulatory pathway.

To the extent an impact assessment is required, PRPA anticipates that many of these information requirements could be coordinated with, informed by, or addressed through studies undertaken as part of the impact assessment process, including environmental, socio-economic, transportation, navigation, Indigenous engagement, risk assessment and mitigation planning studies. PRPA would seek to rely on information generated through the impact assessment process where appropriate to support the exercise of its own statutory authorities and regulatory decision-making responsibilities.

- d) *Identify any associated project-specific guidance or issues of which the proponent should be aware, or information the proponent should provide.*

PRPA's review of any future authorization request associated with the proposed project would focus on matters within its statutory mandate as a federal port authority, including the management of federal port lands, land-use compatibility, operational compatibility, navigation and marine safety, transportation infrastructure, environmental stewardship, and the orderly development and operation of the Port of Prince Rupert.

The proponent should be aware that, as the proposed project involves a large-scale LPG storage and export facility on federal port lands, it may require consideration of:

- (a) compatibility with existing and planned land uses within the Port of Prince Rupert;
- (b) compatibility with existing marine, rail and terminal operations;
- (c) navigation, vessel traffic, marine safety and emergency response considerations;
- (d) rail transportation capacity, operational interfaces and associated logistics infrastructure;
- (e) environmental stewardship and management considerations associated with the handling, storage and export of LPG;
- (f) potential impacts on Indigenous interests and marine use activities;
- (g) consistency with PRPA's responsibilities respecting long-term port planning and the orderly development of federal port lands; and
- (h) the information necessary to evaluate alternative project designs, configurations, operating approaches, transportation arrangements, mitigation measures or other means of addressing operational, environmental, safety or land-use compatibility concerns.

PRPA also notes that previous project descriptions submitted in respect of the proposed LPG facility appear to differ from the designated project description currently before IAAC, including with respect to project scope and storage capacity. The proponent should clearly identify the relationship between the current designated project and any previous project descriptions or regulatory submissions relating to the same lands and facilities, and explain any material differences between those proposals.

To the extent an impact assessment is required, PRPA anticipates that information generated through the impact assessment process may assist in addressing many of these matters and may be relied upon by PRPA in exercising its statutory responsibilities.

- 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.*

PRPA is considering whether the circumstances may warrant notice which would trigger section 17 of the *Impact Assessment Act* in respect of one or more statutory authorization powers that may be required for the project to proceed, in whole or in part. Based on the information currently available, PRPA has identified significant regulatory considerations relating to the compatibility of the proposed project with PRPA's responsibilities respecting federal port land management, long-term port planning, transportation and infrastructure planning, operational compatibility, navigation and marine safety, environmental stewardship, and the orderly development of the Port of Prince Rupert. These considerations arise from PRPA's statutory mandate under the Canada Marine Act, its Letters Patent, and associated regulatory authorities.

PRPA notes that its long-term planning and development activities for Ridley Island and related export infrastructure have proceeded on the basis of a particular land-use and development framework. Based on the information currently available, PRPA is assessing whether the proposed project is compatible with that framework and whether enabling the project would require material reconsideration of planning assumptions, infrastructure planning decisions, land allocation decisions, and development initiatives that have informed the management and development of federal port lands over an extended period.

As a result, PRPA has identified the potential that these considerations may lead PRPA to conclude that the exercise of one or more statutory authorization powers required for the project to proceed would be inconsistent with PRPA's responsibilities respecting federal port land management, long-term port planning, operational compatibility, infrastructure planning, environmental stewardship and the orderly development of the Port of Prince Rupert.

- 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:**

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

PRPA has not completed Table 1. PRPA's principal concerns relate to land-use compatibility, port planning, operational compatibility, infrastructure planning and the orderly development of the Port of Prince Rupert. Those matters are addressed elsewhere in this FAAR and are more directly relevant to PRPA's statutory responsibilities than project-specific impact assessment issues.

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.