Response to IAAC's Summary of Issues

Trigon Pacific LPG Project

August 24, 2026

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INTRODUCTION

Trigon Pacific Terminals Ltd. (Trigon) appreciates the opportunity to respond to the Impact Assessment Agency of Canada's (IAAC) Summary of Issues for the Trigon Pacific LPG Project (the Project). This response addresses the key issues identified by IAAC and supports IAAC's determination under Section 16 of the *Impact Assessment Act*.

Trigon has considered the input received from federal authorities, Indigenous groups, and the public during the Planning phase, including the submissions provided in response to the Summary of the Initial Project Description. Trigon recognizes the importance of this input in informing the understanding of potential effects and issues associated with the Project and has sought to reflect that input in the responses provided below.

For each issue identified by IAAC, Trigon describes the approach it intends to take to address the issue through the continued development of the Project. As appropriate, this includes consideration of applicable legislative and regulatory requirements, standard mitigation measures, established industry practices, and Project-specific commitments, policies, and standards. The responses are intended to provide a clear, proportionate, and practical overview at this stage of Project planning, recognizing that the level of detail will be further developed through subsequent phases of the Project.

Trigon Terminals is an operating coal and LPG export facility and operates safely, respectfully, and in an environmentally responsible manner within an established and effective ecosystem of Acts, regulations, plans, policies, certifications, and memberships that govern the operation of the facility and activities around it as outlined in Appendix A. Trigon's plans and policies will be updated as needed for the Project to ensure compliance with all applicable Acts and regulations as well as commitments made in the IPD, this document, and during Indigenous and public engagement.

Trigon is also committed to meaningful engagement with Indigenous groups throughout the development of the Project. Trigon recognizes the importance of Indigenous knowledge, perspectives, and participation in understanding and addressing potential Project effects, and supports the Government of Canada's commitment to advancing Reconciliation. Trigon will continue to engage with Indigenous groups and consider their input as the Project is further developed and as additional information becomes available.

This response is intended to demonstrate Trigon's commitment to addressing the issues identified by IAAC in a manner that is consistent with applicable requirements and informed by ongoing engagement, technical assessment, and good practice. It also provides a basis for the continued refinement of the Project and, where applicable, the scope and information requirements for any subsequent impact assessment.

KEY ISSUES AND RESPONSES

FISH AND FISH HABITAT

Key Issue 1

Concerns about adverse effects to fish and fish habitat, including species at risk, from project-related marine shipping activities, including underwater noise and vessel strikes. Provide information on the potential adverse effects on fish and fish habitat from project related marine shipping and measures that address the potential effects.

Trigon Response

Though shipping will be handled by third-party vessel operators, Trigon recognizes that the Project will increase ship movements between the Trigon terminal and Triple Island and out into international waters. The operation of these ships is governed by the PRPA, the Pacific Pilotage Authority, Transport Canada, and Fisheries and Oceans Canada and are outside of the direct care and control of Trigon. The following discusses the potential adverse effects on fish and fish habitat from the incremental addition of shipping servicing the Project and measures that can be adopted to address the potential effects. It should be noted that LPG vessels have been using the Trigon jetty and transiting the same shipping route since 2019. Currently, approximately five LPG vessels call at the facility per month, and the Project will add approximately five additional ships per month.

Marine shipping has the potential to affect fish and fish habitat primarily through increased vessel traffic rather than through the LPG cargo itself. Environmental assessments for similar projects in Prince Rupert have identified the following potential effects and mitigation measures.

Potential Adverse Effect	Potential Impact on Fish and Fish Habitat	Proposed or Existing Mitigation Measures[1]
Underwater vessel noise	Increased underwater noise may mask communication, alter fish behaviour, disrupt migration routes, reduce feeding efficiency, and affect spawning activities, particularly for salmon and forage fish.	• Use established shipping routes (Existing Mitigation). • Minimize unnecessary vessel speeds where operationally feasible (Existing Mitigation). • Optimize vessel scheduling to reduce congestion (Existing Mitigation). • Maintain vessel propulsion systems and propellers to reduce noise (Existing Mitigation).

[1] See PRPA's Port Information Guide: https://www.rupertport.com/port-information-guide/

Potential Adverse Effect	Potential Impact on Fish and Fish Habitat	Proposed or Existing Mitigation Measures[1]
		• Implement underwater noise monitoring and adaptive management (Existing Mitigation).
Risk of accidental spills	Fuel or lubricant spills can cause toxicity to fish, contaminate habitats, reduce water quality, and affect eggs and larvae. LPG (propane or butane) evaporates rapidly and generally does not persist in water like crude oil, but marine fuels carried by vessels remain a spill concern.	• Keep an updated Marine Spill Prevention and Emergency Response Plan (Existing). • Use double-hulled fuel tanks where applicable. • Regular vessel inspections and maintenance (Existing Mitigation). • Emergency response equipment and trained personnel (Existing Mitigation). • Coordination with the Canadian Coast Guard and certified spill response organizations (Existing Mitigation).
Propeller wash and vessel wake	Increased turbulence may disturb shallow habitats, resuspend sediments, and affect eelgrass or intertidal habitats near navigation channels and berths.	• Restrict vessel speeds near terminals and sensitive habitats (Existing Mitigation). • Use designated navigation channels (Existing Mitigation).
Ship strikes and disturbance	Although primarily affecting marine mammals, vessel movements may also disturb schooling fish and alter predator-prey interactions.	• Follow designated shipping routes (Existing Mitigation). • Implement marine mammal awareness programs (Existing Mitigation). • Vessel operator training and reporting protocols (Existing Mitigation).
Ballast water discharge	Introduction of invasive aquatic species or pathogens that may compete with native fish or alter habitat quality.	• Comply with Canada's Ballast Water Regulations and the IMO Ballast Water

Potential Adverse Effect	Potential Impact on Fish and Fish Habitat	Proposed or Existing Mitigation Measures[1]
		Management Convention (Existing Mitigation). • Ballast water treatment and exchange requirements. • Record keeping and inspections (Existing Mitigation).
Biofouling	Introduction of invasive marine organisms attached to vessel hulls, affecting ecosystem structure and fish habitat.	• Regular hull cleaning. • Approved antifouling coatings. • Biofouling management plans.
Water quality degradation	Small releases of bilge water, greywater, sewage, or operational discharges may reduce water quality.	• Compliance with the *Canada Shipping Act* and MARPOL discharge requirements (Existing Mitigation). • No unauthorized discharge within port waters (Existing Mitigation). • Routine inspections and monitoring (Existing Mitigation).
Cumulative effects	Combined effects of multiple marine terminals and increased vessel traffic may increase chronic underwater noise and habitat disturbance in Prince Rupert Harbour and adjacent channels.	• Regional cumulative effects monitoring. Trigon supports cumulative effects programs like this and will participate. • Port-wide vessel traffic management (Existing Mitigation). • Environmental monitoring programs (Existing Mitigation). • Adaptive management with Indigenous communities and regulatory agencies.

Mitigation measures will include the use of existing marine infrastructure and established navigation routes, compliance with Port of Prince Rupert and Canadian Coast Guard navigation requirements, adherence to mandatory pilotage, implementation of spill prevention and

emergency response procedures, participation in regional marine safety initiatives, and compliance with applicable federal and international requirements for vessel operations. Existing marine mammal observation protocols and environmental monitoring programs will also be implemented and updated as appropriate.

All vessels calling at the facility will be subject to conditions set out in PRPA's Port Information Guide. This guide includes information on a wide range of topics related to Port operations including:

- Vessel operations
- Vessel Environmental Requirements
- Loading/Discharging Procedures
- Port Security
- Port Navigation
- Issues to be reported
- Arrival/Departure Checklist
- Notification (e.g. Dangerous goods, customs, waste
- Port Safety
    - Emergency contacts
    - Emergency Response including the PRPA Emergency Management Plan

The Project will adopt the following guidance during construction, operations and decommissioning where applicable. These will be incorporated into the Construction Environmental Management Plan and the Operational Environmental Management Plan.

- Standardized General Avoidance and Mitigation Measures: Fisheries and Oceans Canada (2024)[2]
- Fisheries and Oceans Canada (2026): Measures to Avoid and Mitigate Risks to Fish and Fish Habitat[3]
- IAAC Standard Mitigation Measures for Fish and Fish Habitat (IAAC 2026)[4]

In addition, Trigon will ensure compliance with the following Acts, Regulations and conditions, at minimum:

- *Marine Transportation Security Act* and Regulations
- International Ship and Facility Security Code

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[2] https://ehq-production-canada.s3.ca-central-1.amazonaws.com/7b9bfe0ae368e838cd8d50ca659e0174bc5f4a4b/original/1733924264/a4e839c3f2d16552728b1c17e95bcfc9_en_updated_standard_general_avoidance_and_mitigation_measures_Annex_I.pdf?X-Amz-Algorithm=AWS4-HMAC-SHA256&X-Amz-Credential=AKIA4KKNQAKIII4DU7AG%2F20260805%2Fca-central-1%2Fs3%2Faws4_request&X-Amz-Date=20260805T032957Z&X-Amz-Expires=300&X-Amz-SignedHeaders=host&X-Amz-Signature=b88873cc58d23aad144f813ce8b9985df805c40f98535f98f15c62b964a5dfa4

[3] https://www.dfo-mpo.gc.ca/pnw-ppe/measures-mesures-eng.html#6

[4] https://www.canada.ca/en/impact-assessment-agency/services/policy-guidance/practitioners-guide-impact-assessment-act/standard-mitigation-measures.html

- *Fisheries Act*
- *Canadian Navigable Waters Act*
- Ozone-Depleting Substances and Halocarbon Alternatives Regulations
- *Transportation of Dangerous Goods Act*
- National Fire Code
- Storage Tank Systems for Petroleum Products and Allied Petroleum Products Regulations
- *Migratory Birds Convention Act*
- BC Ministry of Environment Discharge Permit (Permit 6698)
- *BC Environmental Management Act*
- BC Hazardous Waste Regulation
- BC Spill Reporting Regulations
- PRPA Lease - Environmental Conditions
- *BC Water Sustainability Act*

As the Trigon facility is shipping coal and supporting the shipment of LPG today, Trigon has an extensive ecosystem of plans and policies related to the safe, and environmentally sound operation of the terminal. These include but are not limited to:

- Workplace Violence and Harassment Prevention Program
- Employment Equity Self-Identification Program
- Emergency Preparedness and Response
- Emergency Response Procedures
- Air Quality Monitoring Procedure
- Soil Management and Excavation Procedure
- Effluent Treatment System
- Mechanical Waste Procedure
- Warehouse Waste Procedure
- Waste Management Reduction Plan
- General Operating Instruction Manual: LPG (rail yard operation)
- Service Track Derail procedure
- Berth Communications Plan
- Berth Checks Cautions PPR Protocols
- Berth Lockout and Activation
- Vessel Berthing Plan
- Train Handling Procedures
- Ship Handling Procedures
- Continuing Education Plan
- Professional Development Credits
- Code of Conduct (incl Human Rights, Workplace Violence)
- Substance Abuse Policy
- Privacy Policy
- Marine Facility Security Plan
- Occupational Health And Safety Plan, including:
    - Safe work practices and procedures

        - Emergency Response Plan
        - Workplace Violence Policy
        - Harassment Policy
        - Crisis Communication Plan
        - Safety Training and Communication
    - Shiploading Plan, including:
        - Tying-up and letting go of a vessel
        - Safe shiploader operation
        - Dock communications
        - High winds shutdown
    - Compliance Obligation Register

Trigon also holds the following ISO Certifications:

- ISO 45001:2018 Certified, which covers:
    - Canadian Labour Code
      WorkSafe BC
    - Procedures and Training
    - Audits
- ISO 9001: 2015 Certified
- ISO 14001: 2015 Certified, which covers:
    - Effluent treatment and control
    - Air pollutant emission inventory
    - GHG Emmission inventory
    - Green Marine Certified

Trigon also holds Green Marine Certification and has achieved the highest available score in the applicable Green Marine performance indicators since 2022.

Preliminary Consideration of Residual Effects

Trigon will not own the LPG or operate the vessels. Trigon controls terminal operations and can establish terminal access and operating requirements, while vessel navigation and operation outside the terminal remain under the applicable authorities, pilots, vessel masters and operators. With the mandatory implementation by shippers of federal Acts and regulations, standard mitigation measures, PRPA's guidance and regulations, and Trigon's established policies and procedures[5], residual effects on marine fish and fish habitat from routine shipping operations are expected to be negligible to not significant, although cumulative effects from increasing regional shipping activity continue to require ongoing management by the Port of Prince Rupert and Transport Canada.

[5] See Appendix A.

Key Issue 2

Concerns about adverse effects on migratory birds, including species at risk, from injury, mortality, sensory disturbance, loss or change of habitat, accidental release of harmful substances and flaring. Provide a list of migratory bird species that may potentially be affected by the project and measures that mitigate the potential adverse effects on migratory birds.

Trigon Response

The Project is located in the Prince Rupert region of northwestern British Columbia, an area that supports a high diversity of migratory birds due to its proximity to coastal marine waters, estuaries, wetlands, intertidal habitats, and mature coastal forests. These habitats provide important breeding, staging, migration, and wintering areas for numerous species protected under the *Migratory Birds Convention Act*, 1994 (MBCA). No critical habitat for migratory birds exists within the Project footprint or in the area around the Project.

The area immediately surrounding the Project is industrial. Migratory birds that may occur within the region include a variety of waterfowl, shorebirds, seabirds, raptors, and passerines. Waterfowl commonly recorded in the region include Canada Goose, American Wigeon, Northern Pintail, Green-winged Teal, Mallard, Greater Scaup, Surf Scoter, and White-winged Scoter. Shorebird species include Dunlin, Western Sandpiper, Least Sandpiper, Black Turnstone, Short-billed Dowitcher, and Greater Yellowlegs.

Marine habitats adjacent to Ridley Island also support seabirds such as Common Murre, Rhinoceros Auklet, Marbled Murrelet, Pigeon Guillemot, and Pelagic Cormorant. Other migratory birds that may occur within or near the Project area include Glaucous-winged Gull, Mew Gull, Bonaparte's Gull, Bald Eagle, Osprey, Northern Harrier, Tree Swallow, Violet-green Swallow, Barn Swallow, Orange-crowned Warbler, Yellow-rumped Warbler, Swainson's Thrush, Pacific Wren, Fox Sparrow, and Great Blue Heron.

Several migratory bird species occurring within the region are considered species at risk under federal or provincial legislation. These include the Marbled Murrelet, Bank Swallow, Barn Swallow, Western Grebe, and Short-eared Owl. Only Barn swallows have been observed to use the project area for forage (Stantec 2025)[6]. No nest sites have been identified in the project footprint.

Potential Project Effects

Construction and operation of the Project, including the installation and operation of an internal ground flare, have the potential to affect migratory birds through direct and indirect pathways.

Construction activities may result in temporary disturbance associated with grading, increased noise, and human activity.

Operational activities have the potential to affect migratory birds through artificial lighting, noise, and periodic flaring events. However, the Project incorporates an internal ground flare, which substantially reduces the potential for adverse effects resulting from attraction,

[6] Ausenco, 2026. LPG Bat and Amphibian Assessment. August 2026
Stantec, 2025. Trigon – Wildlife Habitat Survey and Bat Emergence Survey. January 2025.

disorientation, and mortality during migration compared with conventional elevated flare systems. The flare flame is enclosed within a refractory-lined structure, limiting flame visibility, reducing radiant heat emissions, and minimizing light emitted to the surrounding environment. Consequently, the potential for attracting nocturnally migrating birds or causing disorientation is expected to be considerably lower than for elevated flare systems.

The Project has limited potential to cause bird collisions due to its infrastructure having a relatively low prominence in the area and the enclosed flare design. Nevertheless, exterior lighting will be designed to reduce attraction and collision risk, and use of glass and other reflective material will be kept to a minimum.

Residual operational effects may include localized behavioural avoidance associated with facility noise and lighting, limited attraction of birds to illuminated structures during periods of poor visibility, and a low potential for bird mortality should birds enter flare-related infrastructure. Given the enclosed flare design and implementation of standard operational controls, these risks are expected to be minimal.

Accidental releases of fuels, lubricants, chemicals, wastewater, or fire suppression materials could adversely affect migratory birds through direct exposure, contamination of feathers, reduction in prey availability, or degradation of habitats. Spill prevention, secondary containment, inspection, and emergency response procedures will be implemented to reduce the likelihood and consequence of accidental releases.

Proposed Mitigation Measures

A suite of mitigation measures will be implemented during both construction and operation to avoid or minimize adverse effects on migratory birds. Project activities will comply with the MBCA and Migratory Birds Regulations, including prohibitions against the disturbance, destruction, or taking of active nests, eggs, and migratory birds.

The Project site itself is located within an existing industrial area, and wildlife studies (Stantec 2025)[7] indicate that suitable nesting habitat for migratory birds does not exist within the project area except for barn swallow (*Hirundo rustica*), where the potential habitat is limited to one site: the existing jetty pipe rack where the Project piping will tie into the existing LPG jetty loading line. If clearing or construction activities (e.g. when the pipe connecting the facility is tied into the existing LPG jetty loading pipe) are required during the nesting season, qualified biologists will complete pre-construction nest surveys prior to disturbance. Active nests will be protected through the establishment of species-appropriate setback distances until nesting has concluded. The work will then be delayed to outside the occupancy period.

The internal ground flare has been selected as the preferred flare technology because it minimizes visible flame, radiant heat, smoke production, and light emissions. The flare will be designed and operated to maintain efficient combustion, thereby reducing flare luminosity and minimizing the likelihood of attracting migratory birds. Routine flaring will be minimized through normal operational practices, and emergency flaring will occur only when required for process safety. The facility will minimize non-essential flaring, monitor flare performance during major migration periods, investigate bird mortality incidents, and temporarily modify lighting practices during periods of heavy fog and peak migration where operationally feasible.

[7] Stantec, 2025. Trigon – Wildlife Habitat Survey and Bat Emergence Survey. January 2025.

Facility lighting will be designed using dark-sky principles to reduce unnecessary illumination. Exterior lighting will consist of fully shielded fixtures directed downward, with illumination levels limited to those required for safe operation. Where operationally feasible, warm-coloured lighting and motion-activated fixtures will be used in areas with infrequent occupancy to further reduce light emissions.

Operational mitigation measures include implementation of a Wildlife Management Plan by Trigon incorporating procedures for wildlife observations, employee awareness, and reporting of injured or deceased birds. Waste management practices will be maintained to avoid attracting gulls and other opportunistic bird species to the facility.

Preliminary Consideration of Residual Effects

Following implementation of the proposed mitigation measures, residual effects on migratory birds are expected to be manageable. Temporary habitat disturbance will be limited to the Project footprint, while potential effects on breeding birds will be effectively reduced through timing restrictions and nest protection measures.

The enclosed internal ground flare is expected to substantially reduce bird attraction and disorientation associated with visible flame and lighting compared with conventional elevated flare systems. Consequently, the potential for flare-related mortality is expected to be manageable. Similarly, implementation of dark-sky lighting practices is expected to reduce the likelihood of attraction and collision by nocturnally migrating birds.

With the implementation of standard mitigations and commitments, project effects are expected to be negligible to not significant.

Follow-up and Monitoring

To verify the effectiveness of mitigation measures, post-construction monitoring will be undertaken as part of the Project's environmental management program. Monitoring activities will include periodic inspections for bird mortality, observations of bird use around the facility during spring and fall migration periods, and evaluation of lighting and flare performance. If monitoring identifies unanticipated adverse effects on migratory birds, adaptive management measures will be implemented to further reduce potential impacts.

The Project will adopt the IAAC Standard Mitigation Measures for Migratory Birds (2026)[8], as applicable.

[8] https://www.canada.ca/en/impact-assessment-agency/services/policy-guidance/practitioners-guide-impact-assessment-act/standard-mitigation-measures.html

RIGHTS OF INDIGENOUS PEOPLES

Key Issue 3

Concerns about impacts on the rights of Indigenous peoples as a result of ongoing development and increasing marine shipping in the Port of Prince Rupert through to Dixon Entrance, and increased use of rail transportation along the Skeena River between Terrace and Prince Rupert, resulting in cumulative and ongoing displacement from preferred lands and waters and an inability to exercise governance and decision making over the use of traditional territories. Provide additional information about the potential adverse impacts of project construction, operation, and associated marine shipping and rail transportation on the rights of Indigenous peoples.

Trigon Response

The proposed Project is a brownfield development involving the construction and operation of a new LPG export facility within an existing industrial area, use of an existing marine jetty and marine shipping route for marine export activities, use of existing rail tracks, and an existing rail corridor for rail transportation to the Project site.

As a result, the Project will occur entirely within a previously disturbed industrial footprint, thereby reducing the extent of new land disturbance and marine infrastructure required. Associated rail and shipping will result in increased usage of the existing rail corridor and marine shipping route.

The Project footprint is located within or proximal to the traditional territories of Gitga'at First Nation, Gitxaala Nation, Kitselas First Nation, Kitsumkalum First Nation, Lax Kw'alaams Band, and Metlakatla First Nation. Trigon recognizes that the broader marine use territories of the Haida will be utilized by vessels calling at the facility. Trigon understands that Indigenous peoples in the region exercise constitutionally protected Aboriginal rights recognized and affirmed under Section 35 of the *Constitution Act*, 1982, including rights to harvest fish, shellfish, marine mammals, wildlife, and plants; travel by land and water; access culturally important sites; and undertake cultural, spiritual, and stewardship activities.

Although the Project uses existing industrial infrastructure, it has the potential to result in incremental effects on the exercise of Indigenous rights through facility construction, operations, marine shipping, and rail transportation. The impact on the rights of these Nations is to be informed through engagement with the potentially affected Indigenous Nations. The following draft potential effects on rights are informed by engagement with the Nations to date and previously conducted environmental assessments in the area and will be shared with Nations for their input.

Construction Effects

Because the Project is proposed within an existing industrial site, construction-related effects are expected to be substantially lower than a greenfield development.

Potential adverse effects include:

- Localized disturbance associated with site preparation, equipment operation, and construction activities within previously developed lands. Note that there is no removal of vegetation or habitat associated with the Project.

- Temporary increases in construction noise, dust, vibration, and vehicle traffic that may affect nearby harvesting activities or traditional land use.
- Continued restrictions on access to Ridley Island (access to Ridley Island is restricted by PRPA).
- Potential disturbance of previously unidentified archaeological or cultural heritage resources during excavation activities, although the likelihood is reduced because the site has been previously developed.

As construction will occur within an existing industrial footprint, no new fragmentation of terrestrial habitat or interruption of traditional travel corridors is anticipated. The Project will add approximately one unit train per day and four to five ships per month.

Operational Effects

Operational effects on Indigenous rights are expected to be largely associated with the continued industrial use of the site rather than the introduction of a new industrial area.

Potential effects include:

- Continued restriction of access within the existing industrial facility for safety and security purposes.
- Incremental increases in industrial activity, including noise, lighting, and routine operational emissions.
- Minor changes in local wildlife use adjacent to the facility.
- Continued occupation of previously developed lands, with no additional loss of traditional harvesting habitat.
- Perceptions regarding environmental quality that could influence confidence in harvesting traditional foods, even where environmental monitoring demonstrates compliance with regulatory standards.

Because the facility will operate within an established industrial area, operational effects are expected to represent an incremental increase above existing baseline conditions.

Marine Shipping Effects

The Project will use an existing marine jetty and berth, and third-party vessels calling at the facility will use established shipping routes, thereby avoiding construction of new marine infrastructure, dredging, or expansion of shipping routes. Additionally, no direct disturbance of marine habitat associated with construction of new marine infrastructure is required.

Potential adverse effects include:

- An incremental increase in LPG carrier traffic using existing marine shipping routes.
- Temporary interference with Indigenous fishing vessels and traditional marine travel during vessel arrivals and departures.
- Increased underwater noise associated with additional vessel movements.
- Potential behavioural disturbance of fish and marine mammals that support Indigenous harvesting activities.
- Incremental increase in the risk of vessel interactions with marine mammals.
- Incremental increase in the risk of marine spills associated with vessel loading and transit, although this risk will be minimized through existing LPG cargo handling and safety systems, marine safety systems, terminal operating procedures, pilotage requirements, and emergency response planning.

Overall, marine effects are expected to be limited to the incremental increase in vessel traffic above existing shipping activity.

Rail Transportation Effects

LPG will be delivered using the existing CN rail network serving Ridley Island and Trigon Terminal. Because the Project will rely on an existing rail corridor, no new rail infrastructure or associated habitat disturbance is anticipated.

Potential effects include:

- Incremental increases in the number of LPG unit trains or railcars.
- Temporary delays at public road crossings used by Indigenous communities and harvesters.
- Minor increases in rail-related noise and vibration.
- A small increase in the transportation risk associated with dangerous goods, managed through federal railway safety requirements and emergency response planning.

Effects on Indigenous Cultural Heritage

Given the brownfield nature of the Project, the likelihood of affecting previously undisturbed archaeological or cultural heritage resources is low.

The Project will not affect previously undisturbed culturally important landscapes.

No excavation will extend below previously disturbed soils. An Archaeological Overview Assessment (AOA) has been conducted, and a draft has been shared with Nations on August 13, 2026, for review.

Potential effects on Indigenous cultural heritage may include:

- Disturbance of previously unidentified archaeological resources.
- Changes to the visual character of the existing industrial landscape through the addition of new process equipment.

Mitigation Measures

The Project will implement mitigation measures to minimize potential effects on Indigenous rights, including:

- Continued engagement with potentially affected Indigenous Nations throughout Project planning, construction, operation, and decommissioning.
- Incorporation of Indigenous Knowledge into Project planning and environmental management, where shared by Indigenous Nations.
- Limiting construction activities to previously disturbed industrial areas. The Project will be built on an existing industrial site.
- Minimizing temporary construction disturbance through traffic, noise, and dust management.
- Conducting archaeological monitoring as recommended in the draft AOA, where new ground disturbance is proposed and implementing Chance Find Procedures, Archaeological Awareness Training for all workers on site, and adoption of an Ancestral Remains Policy.
- Maintaining existing access routes outside areas where temporary safety restrictions are required.
- Using existing rail and rail yard to minimize impacts on land.

- Using the existing marine jetty and marine shipping route to avoid new marine habitat disturbance.
- Implementing vessel traffic management measures consistent with existing port operations.
- Applying spill prevention, emergency response, and environmental protection procedures for marine loading operations.
- Providing opportunities for Indigenous participation in environmental monitoring, including Indigenous Guardian programs, where agreed.
- Supporting Indigenous employment, training, procurement, and contracting opportunities during construction and operations.

Preliminary Consideration of Residual Effects

After implementation of mitigation measures, residual effects on Indigenous rights are expected to be negligible to not significant because:

- the Project will be located within an existing industrial site;
- no new marine terminal or jetty construction will be required;
- no new marine shipping routes will be established;
- no new rail corridor between Fort Saskatchewan and Prince Rupert will be constructed; and
- habitat disturbance will be largely confined to previously disturbed lands.

Residual effects are expected to be primarily associated with the incremental increase in industrial activity, marine vessel traffic, and rail transportation rather than new physical disturbance of lands or waters.

Potential residual effects may include localized changes in the experience of exercising Indigenous rights due to increased marine traffic, temporary delays in marine or rail travel, and continued industrial occupation of lands already unavailable for traditional use. These effects are expected to be localized and largely confined to areas already influenced by existing industrial activities.

Engagement with affected Indigenous Nations remains essential to understand how Project-related changes may affect the exercise of rights in practice and to identify appropriate mitigation, monitoring, and, where warranted, accommodation measures.

INDIGENOUS PEOPLES' PHYSICAL AND CULTURAL HERITAGE

Key Issue 4

Concerns about adverse effects to heritage resources, archaeological sites, cultural values, and the preservation of Indigenous history, culture, rights, and title due to further disturbance or destruction of archaeological and culturally important areas as a result of the project, limited Indigenous participation in studies and monitoring, and increased recreational use associated with an influx of workforce. Provide additional information about the potential adverse effects to heritage resources, including archaeological sites, and the intangible facets of cultural heritage. Outline heritage studies, procedures, or plans (e.g., chance find protocols) that have been developed to address potential adverse effects to heritage resources.

Trigon Response

The Project is a brownfield development on an existing operational coal yard. When the coal terminal was built, the land was largely brought down to bedrock prior to being built up as a coal export facility. An AOA has been conducted that suggests that the site has low potential for heritage resources and archaeological sites, however, it recommends that Chance Find Procedures be adopted and that archaeological monitors be on site during ground disturbance activities.

Trigon accepts these recommendations and commits to their inclusion in the Construction Environmental Management Plan. The draft AOA is being reviewed by Nations and is expected to be finalized in Q3 2026.

Trigon has developed Chance Find Procedures, and an Ancestral Remains Policy and Indigenous Cultural Awareness training with Metlakatla and Lax Kw'alaams as part of the Area A clearing project. Trigon will update these documents with these Nations prior to construction to ensure they reflect current policy and practices.

Key Issue 5

Concerns about adverse effects to heritage resources, archaeological sites, cultural values, and the preservation of Indigenous history, culture, rights, and title as a result of marine shipping associated with the project. Provide information about potential impacts to sensitive, protected areas such as McIntyre Bay, Celestial Reef, and Learmonth Bank.

Trigon Response

The Project is a brownfield development that will utilize an existing marine terminal, existing jetty, and established shipping routes within Prince Rupert Harbour. No new marine infrastructure, dredging, berth construction, or navigation channel modifications are proposed. Consequently, the Project is not expected to result in direct physical disturbance to marine habitats within McIntyre Bay, Celestial Reef, Learmonth Bank, or other ecologically sensitive marine areas.

Trigon acknowledges that the cultural significance of these areas, potential effects on Indigenous rights and cultural values, and appropriate mitigation measures will continue to be identified and assessed through engagement with potentially affected Indigenous Nations and referred to the appropriate federal authority that could respond to the concern.

The primary pathway for potential effects is the incremental increase in marine vessel traffic associated with LPG carrier movements. Potential indirect effects include temporary underwater noise, localized behavioural responses of marine mammals, fish, and seabirds during vessel transit, temporary interference with marine wildlife movements, and a small incremental increase in the risk of accidental marine spills. These potential effects will occur within an existing commercial shipping environment that already supports regular marine traffic associated with the Port of Prince Rupert.

McIntyre Bay supports productive intertidal and nearshore habitats used by fish, marine birds, marine mammals, and Indigenous harvesters. As third-party vessels calling at the terminal will remain within established shipping routes and will not enter shallow nearshore habitats, direct effects on sensitive habitats within McIntyre Bay are not anticipated. Potential effects are expected to be limited to temporary and localized behavioural responses of marine wildlife during vessel passage. This disturbance pattern is well established.

Celestial Reef is recognized as an ecologically important rocky reef system that supports diverse marine communities. The Project will not involve dredging, anchoring, or construction activities within or adjacent to the reef. Third party vessels calling at the terminal will utilize existing shipping routes and will not be expected to physically disturb reef habitats. Potential effects will be limited to temporary underwater noise and localized behavioural responses of marine fauna. This disturbance pattern is well established.

Learmonth Bank is an ecologically significant offshore marine feature supporting productive benthic and pelagic ecosystems. Similar to McIntyre Bay and Celestial Reef, no direct habitat disturbance is anticipated because the Project will not require new marine infrastructure. Potential effects are limited to the incremental increase in vessel traffic and associated underwater noise within existing marine shipping routes.

Mitigation measures will include the use of existing marine infrastructure and established navigation routes, compliance with Port of Prince Rupert and Canadian Coast Guard navigation requirements, adherence to mandatory pilotage, implementation of spill prevention and emergency response procedures, participation in regional marine safety initiatives, and compliance with applicable federal and international requirements for vessel operations. Existing PRPA marine mammal observation protocols and environmental monitoring programs will also be implemented as appropriate.

Based on the use of existing marine infrastructure, the absence of new in-water construction, and the implementation of existing standard marine operating procedures and mitigation measures, the effects on these resources associated with marine shipping are expected to be negligible. No significant adverse effects on the ecological integrity of McIntyre Bay, Celestial Reef, Learmonth Bank, or other sensitive marine areas are expected. The Project's contribution to cumulative marine shipping effects is expected to be incremental and proportionate to existing commercial marine traffic in the Prince Rupert region. Clear Seas forecasts that international vessel traffic on B.C.’s North Coast could increase from approximately 529 vessel

calls annually in 2023 to 1,676 vessel calls annually by 2040, representing a 217% increase[9]. Vessels calling at Trigon LPG would represent around 3.5% of the total forecasted volume or 5% of the incremental forecasted volume in 2040.

INDIGENOUS PEOPLES' CURRENT USE OF LANDS AND RESOURCES FOR TRADITIONAL PURPOSES

Key Issue 6

Concerns about adverse effects to Indigenous peoples' ability to harvest wildlife, and culturally, economically, and spiritually important species due to increased recreational activity associated with workforce influxes, and project-related noise, light, and vibration, which may reduce resource availability and alter wildlife behaviour, foraging patterns, and habitat use. Provide additional information about potential effects to current use and access to lands and resources for traditional purposes as a result of changes to sensory conditions and influx of the project workforce to the area. Include consideration of changes to sensory conditions both on the land and on the water.

Trigon Response

The Project is a brownfield development that will be constructed and operated within an existing industrial site and will utilize an existing marine terminal and jetty. Ridley Island, which includes the project site, is not accessible to the public, and a marine safety zone exists at Trigon's berth face today when LPG is being loaded. As a result, changes to sensory conditions (e.g. noise, lighting, visual environment, and human activity) are expected to occur primarily within an area that is already influenced by existing industrial and marine operations. The Project is therefore expected to result in incremental changes to existing baseline conditions rather than introducing new sources of disturbance into previously undisturbed areas.

Existing Trigon workforce management measures will be updated to minimize interactions between the workforce and Indigenous land users and reduce potential conflict over access to traditional use areas.

Construction

Construction activities will temporarily increase noise, vibration, dust, lighting, vehicle traffic, and human presence within and immediately adjacent to the existing industrial facility. Because construction will occur within an existing industrial footprint, effects are expected to be localized and of limited duration. Access to traditional use areas outside the Project footprint, and outside PRPA's current access restrictions, is expected to be maintained.

However, changes have the potential to affect the current use of lands and resources for traditional purposes by:

- temporarily reducing the quality of the experience for Indigenous land users undertaking harvesting, cultural, or recreational activities near the Project site;

[9] https://clearseas.org/wp-content/uploads/Clear-Seas_Vessel_traffic_forecast_to_2040_Pacific_region_EN_27.pdf#page=40

- causing localized avoidance of the area by wildlife species relied upon for traditional harvesting;
- increasing construction traffic, which may temporarily affect access to nearby roads, or marine areas; and
- creating temporary visual disturbance associated with construction equipment and activities.

Operations

During operations, the Project will result in ongoing, but incremental, changes to sensory conditions associated with facility operations, including process equipment, lighting, routine maintenance activities, and marine loading operations. Given the existing industrial setting and restricted access to Ridley Island, these changes are expected to represent a relatively small incremental increase above current conditions.

Potential effects on current use of lands and resources for traditional purposes include:

- localized increases in ambient noise that may affect the experience of harvesting or cultural activities in areas immediately adjacent to the facility or Ridley Island;
- additional facility lighting that may alter the nighttime visual environment;
- continued industrial presence within an existing industrial landscape;
- localized behavioural responses of wildlife to noise or lighting, which could influence hunting opportunities in the immediate vicinity of Ridley Island; and
- perceptions regarding environmental quality that could influence the willingness of Indigenous land users to harvest traditional foods near the facility.

Marine Environment

Marine shipping calling at the facility has the potential to result in incremental changes to sensory conditions on the water through increased vessel traffic, underwater noise, wake generation, and visual presence of LPG carriers.

Potential effects include:

- temporary disruption or delays to Indigenous marine travel during vessel arrivals and departures;
- temporary underwater noise that may influence the behaviour of fish and marine mammals relied upon for harvesting;
- temporary disturbance to marine birds during vessel passage;
- localized increases in visual activity within established shipping routes; and
- temporary reductions in the quality of the experience for Indigenous users travelling or harvesting near active shipping routes.

The Project will utilize an existing jetty, comply with existing Transport Canada established marine safety (exclusion) zones, and third-party vessels calling at the facility will use established marine shipping routes. No new marine access restrictions are anticipated. Clear Seas forecasts that international vessel traffic on B.C.'s North Coast could increase from approximately 529 vessel calls annually in 2023 to 1,676 vessel calls annually by 2040,

representing a 217% increase[10]. Vessels calling at Trigon LPG would represent around 3.5% of the total forecasted volume or 5% of the incremental forecasted volume in 2040.

Workforce Influx

Construction of the Project will require a temporary workforce (~250 people at peak construction), while operational staffing requirements are expected to be comparatively modest (~40 new full-time jobs).

As the Project is located within an established industrial area in Prince Rupert, Trigon hopes to source as much of its workforce as possible from the local and regional labour market. However, this may be challenging if other projects in the region are being built at the same time. If workers are required to be sourced from outside the region, they will be accommodated in a third-party operated camp, local hotels, and/or accommodation providers experienced with servicing construction teams.

The Project will implement workforce management measures, including worker orientation, codes of conduct, and policies respecting Indigenous rights, cultural awareness, and appropriate use of public lands and resources. These measures are intended to minimize interactions between the workforce and Indigenous land users and reduce the potential for conflicts over access to traditional use areas.

Concerns raised by Nations associated with workforce influx may include but not be limited to:

- increased demand on local transportation infrastructure and community services during construction;
- increased human presence in areas used by Indigenous peoples for recreation or harvesting;
- increased recreational use of nearby public lands or waters by non-local workers, where applicable;
- potential interactions between workers and Indigenous land users;
- increased recreational use of harvesting areas;
- competition for resources;
- reduced solitude or privacy for cultural activities; and
- increased use of roads, waterways, boat launches, and public access points.

Mitigation Measures

To minimize potential effects on the current use of lands and resources for traditional purposes, the Project will:

- limit construction activities to the existing industrial footprint;
- implement noise, dust, and lighting management measures during construction and operations;
- direct lighting downward and use shielded fixtures to minimize light spill beyond the facility;
- schedule construction activities to minimize unnecessary disturbance, where practicable;

[10] https://clearseas.org/wp-content/uploads/Clear-Seas_Vessel_traffic_forecast_to_2040_Pacific_region_EN_27.pdf#page=40

- maintain public and marine access outside areas where temporary safety restrictions are required;
- utilize the existing marine terminal and established navigation routes to avoid creating new marine access constraints;
- implement marine communication procedures to facilitate safe navigation with other water users;
- develop and implement a Workforce Management Plan that includes worker accommodations, transportation planning, cultural awareness training, and expectations regarding access to traditional lands and resources. This Plan will be shared with Nations at least three months in advance of the start of construction;
- continue engagement with potentially affected Indigenous Nations throughout Project construction and operations to identify concerns regarding access or sensory conditions; and
- incorporate Indigenous Knowledge, where shared, into adaptive management and monitoring programs.

Preliminary Consideration of Residual Effects

The Project is expected to result in localized and incremental changes to sensory conditions within an area that is already characterized by industrial development and commercial marine activity. While temporary changes in noise, lighting, visual conditions, human activity, and marine traffic may influence the experience of exercising Indigenous rights and the current use of lands and resources for traditional purposes in the vicinity of the Project, these effects are expected to be limited by the Project's brownfield location, use of existing marine infrastructure, and implementation of mitigation measures. Existing Trigon workforce management measures will be updated to minimize interactions between the workforce and Indigenous land users and reduce potential conflict over access to traditional use areas. The Project is not expected to create new barriers to accessing traditional lands or waters beyond temporary and localized safety restrictions.

Based on the Project's use of an existing industrial site and existing marine infrastructure, effects are anticipated to be incremental in nature; however, the assessment of impacts on current use of lands and resources for traditional purposes will continue to be informed through engagement with potentially affected Indigenous Nations.

Key Issue 7

Concerns about adverse effects to Indigenous peoples' ability to harvest wildlife and fish, and culturally, economically, and spiritually important species due to increased marine vessel activity. Provide additional information about potential effects to Indigenous marine use, including the ability to access and successfully utilize key harvesting sites during commercial fishing windows.

Trigon Response

The Project is being built on a site that will utilize an existing marine terminal, existing jetty, and established shipping routes within Prince Rupert Harbour. No new marine infrastructure, dredging, or navigation routes are proposed. As a result, potential effects on Indigenous marine use are expected to be associated primarily with the incremental increase in third-party marine

vessel traffic during Project operations rather than changes to marine habitat or access resulting from new infrastructure.

Indigenous Nations in the Prince Rupert region rely on marine areas for the exercise of Aboriginal rights, including the harvesting of fish, shellfish, marine plants, and marine mammals, as well as travel between communities and access to culturally important sites. Indigenous commercial and food, social and ceremonial (FSC) fisheries may occur seasonally in areas that overlap with existing shipping routes and marine terminal operations. Trigon understands concerns raised about third-party vessel traffic affecting the ability of Indigenous harvesters to safely access and effectively use traditional harvesting areas during key fishing periods.

Construction

Construction activities are expected to occur only on land within the existing industrial site. No-in-water or over water works are required for the Project.

Operations and Marine Shipping

Vessels calling at Trigon's terminal will use established shipping routes that are currently used by commercial vessels serving Prince Rupert and Trigon's terminal. Indigenous marine users currently operate within this marine environment and regularly navigate alongside commercial shipping. The Project is therefore expected to contribute an incremental increase in vessel traffic rather than introduce a new navigation route or new marine access constraint.

Localized safety exclusion zones established by PRPA around LPG carriers are in effect today and are temporary, limited to the immediate vicinity of the vessel during berthing and departure, and managed through existing marine traffic control procedures. Indigenous vessels will continue to have access to surrounding marine areas outside the operational safety zone.

Potential effects on Indigenous marine use during operations include:

- additional temporary navigation delays associated with the arrival and departure of LPG carriers;
- Continued localized safety exclusion zones immediately surrounding vessels during berthing, loading, and departure for navigational safety. The safety exclusion zone around Trigon's berth was established with PRPA and TC and has been in effect during LPG loading operations since 2019;
- additional temporary disruption of travel routes used by Indigenous harvesters within existing navigation channels;
- additional localized underwater noise that may temporarily influence the behaviour or distribution of fish and marine mammals relied upon for harvesting;
- additional temporary displacement of fishing activities immediately adjacent to transiting vessels; and
- increased vessel traffic during periods that may overlap with Indigenous commercial and FSC fishing seasons.

Commercial Fishing Windows

The timing of vessel movements has the potential to overlap with periods of intensive Indigenous commercial and FSC harvesting, including salmon, halibut, crab, shrimp, shellfish, and other marine resources. During these periods, temporary vessel movements could require harvesters to delay travel, adjust fishing locations, or temporarily suspend fishing activity while commercial vessels transit.

However, vessel arrivals and departures are expected to occur intermittently, and transit times through the harbour are relatively short. The duration of any navigation restrictions associated with individual vessel movements is therefore expected to be limited. Because the third-party vessels calling at the facility will use existing shipping routes and an existing berth, no permanent loss of access to harvesting areas is anticipated.

Mitigation Measures

To minimize potential effects on Indigenous marine use, the Project and/or operator compliance with PRPA's Port Information Guide[11] will:

- utilize the existing marine terminal and established navigation routes to avoid creating new marine access constraints;
- coordinate vessel movements through existing Port of Prince Rupert marine traffic management systems;
- comply with Canadian Coast Guard and Pacific Pilotage Authority navigation requirements;
- communicate vessel schedules, where practicable, through established marine notification systems;
- maintain the safety zone only for the minimum duration necessary to ensure safe navigation and loading operations;
- Comply with existing Trigon plans and policies (see Appendix A)
- continue engagement with Indigenous Nations and Indigenous commercial fishers to better understand seasonal harvesting patterns and areas of importance;
- consider operational measures, where practicable, to reduce conflicts between vessel movements and key harvesting periods;
- implement spill prevention and emergency response measures to protect marine resources relied upon by Indigenous communities; and
- support ongoing monitoring of marine shipping interactions and adaptive management where monitoring or engagement identifies unanticipated effects.

Preliminary Consideration of Residual Effects

Following implementation of mitigation measures, effects on Indigenous marine users are expected to be localized, temporary, and incremental. Shipping is not expected to permanently restrict access to marine harvesting areas or alter established navigation routes. Potential residual effects are expected to be limited to short-duration navigation delays, temporary avoidance of active shipping routes during vessel transits and localized behavioural responses of marine species to vessel presence and underwater noise.

Given the Project's reliance on existing marine infrastructure and third-party shippers using existing shipping routes, and the intermittent nature of vessel movements, it is not expected to significantly affect the ability of Indigenous peoples to access or successfully utilize key harvesting sites during commercial or food, social and ceremonial fishing windows. Nevertheless, Trigon recognizes that the timing of vessel movements may be particularly important during peak harvesting periods and will continue to work with potentially affected Indigenous Nations to identify opportunities to minimize operational interactions, incorporate

[11] https://www.rupertport.com/port-information-guide/

Indigenous Knowledge into operations, and implement adaptive management measures where appropriate.

INDIGENOUS PEOPLES' HEALTH, SOCIAL, AND ECONOMIC CONDITIONS

Key Issue 8

Concerns about adverse effects on noise and air quality from construction, operations, decommissioning, and activities associated with combustion (including flaring, and transportation by rail or marine shipping) that may generate air contaminants, including particulate matter, nitrogen oxides, and sulfur dioxide, and cause long-term health impacts through exposure. Provide information on potential adverse effects on human health from changes to noise and air quality.

Trigon Response

The Project will be constructed on a brownfield site within an existing industrial site and will utilize an existing marine terminal and jetty. As a result, potential effects on human health from changes in noise and air quality are expected to be incremental relative to existing industrial conditions in the Prince Rupert area. The Project has been designed to minimize emissions and noise through the use of established engineering controls, operational procedures, and regulatory compliance measures.

Noise

Potential noise emissions will occur during both construction and operation of the Project.

During construction, temporary increases in noise will be associated with site preparation, equipment installation, vehicle movements, and construction activities. These activities will be intermittent, localized, and limited to the construction period. Construction activities will generally occur during planned working hours, and standard best management practices, including IAAC Standard Mitigation Measures (2026) and BC Energy Regulator's BC noise Control Best Practices Guideline[12] (2024), will be implemented to minimize noise generation.

During operations, noise sources will include compressors, pumps, process equipment, loading operations, rail activities within the terminal, marine loading operations, and support equipment. Trigon understands these noise sources and effectiveness of mitigation based on its operating experience. The Project will incorporate noise control measures into facility design, including equipment selection, acoustic insulation, silencers, and enclosure of major noise-generating equipment where appropriate.

Project-related marine shipping and rail transportation may also contribute to incremental increases in environmental noise. However, these activities will occur within existing transportation corridors and an established industrial and port setting that already experiences commercial shipping and rail operations.

[12] https://www.bc-er.ca/files/operations-documentation/Energy-Resource-Activity-Operations-Manual/Supporting-Documents/BC-Noise-Control-Best-Practices-Guideline.pdf

Trigon will adopt IAAC Standard Mitigation Measures[13] for noise during construction and will conduct sound monitoring during construction and operations and demonstrate compliance with applicable provincial and PRPA noise objectives.

Based on the Project design and the existing industrial setting, operational noise is not expected to result in adverse health effects for nearby residents in the community Port Edward, located at least 2km from the Project site.

Air Quality

Construction activities have the potential to temporarily affect local air quality through emissions from diesel-powered equipment, construction vehicles, and dust generated during earthworks and material handling. These emissions are expected to be temporary and localized.

Construction mitigation measures will include:

- dust suppression using water or other approved methods;
- minimizing exposed soil surfaces where practicable;
- covering or stabilizing stockpiled materials;
- maintaining construction equipment in good operating condition;
- minimizing unnecessary equipment idling; and
- implementing traffic management measures to reduce vehicle emissions.

Operational air emissions will primarily consist of combustion products from process equipment, emergency or planned maintenance flaring, marine loading operations, rail movements within the facility, and vehicle traffic. The Project will utilize an internal ground flare, which substantially reduces visible flame, radiant heat, smoke, and light emissions compared with conventional elevated flares. Routine flaring will be minimized through normal operating practices, with flaring occurring primarily during commissioning, maintenance, upset conditions, or emergency events.

Potential air contaminants may include:

- nitrogen oxides (NO_x);
- carbon monoxide (CO);
- particulate matter ($PM_{2.5}$ and PM_{10});
- sulphur dioxide (SO_2);
- volatile organic compounds (VOCs);
- greenhouse gases; and
- trace combustion by-products.

An air quality assessment will be completed by Trigon using recognized atmospheric dispersion modelling to predict ground-level concentrations of Project-related emissions at nearby communities and other sensitive receptors. The assessment will evaluate predicted concentrations against applicable federal[14] and British Columbia ambient air quality objectives[15]

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[13] https://www.canada.ca/en/impact-assessment-agency/services/policy-guidance/practitioners-guide-impact-assessment-act/standard-mitigation-measures.html

[14] Canadian Ambient Air Quality Objectives and Canadian Environmental Protection Act

[15] https://www2.gov.bc.ca/gov/content/environment/air-land-water/air/air-quality-management/regulatory-framework/objectives-standards

and standards. Cumulative emissions from existing industrial facilities and marine transportation, will require participation from other industry in the area and will be best led by PRPA. Trigon will be willing to participate in a PRPA led initiative like this.

Based on the use of modern process equipment, emission controls, the enclosed flare design, and the relatively limited emissions associated with an LPG export terminal, Project-related contributions to regional air contaminant concentrations are expected to be small.

Human Health

Human health may be affected if Project-related changes in noise or air quality result in exposure levels exceeding health-based guidelines or objectives. A human health assessment by Trigon will evaluate potential air quality exposure pathways for nearby residents, Indigenous communities, workers, and other sensitive receptors.

The assessment will consider:

- inhalation exposure to air contaminants;
- potential nuisance effects associated with dust or odours;
- potential sleep disturbance or annoyance associated with environmental noise;
- cumulative exposure from existing industrial sources; and
- potential effects on sensitive populations, including children, older adults, and individuals with pre-existing respiratory or cardiovascular conditions.

Predicted concentrations of air contaminants and environmental noise will be compared with applicable health-based criteria in the Canadian Ambient Air Quality Standards to determine whether there is potential for adverse health effects.

Based on preliminary Project design, compliance with applicable regulatory requirements, and implementation of mitigation measures, the Project is expected to maintain air contaminant concentrations and environmental noise levels below applicable health-based thresholds at nearby receptors.

Mitigation Measures

The Project will implement the following measures to minimize potential effects on human health:

- incorporate noise control into facility design through equipment selection, silencers, acoustic insulation, and equipment enclosures;
- conduct preventative maintenance to ensure equipment operates efficiently and within design specifications;
- minimize unnecessary flaring and utilize an enclosed ground flare to reduce visual effects;
- implement dust suppression and erosion control measures during construction;
- minimize unnecessary equipment idling and maintain construction equipment in accordance with manufacturer specifications;
- implement an air emissions management program during operations;
- monitor emissions;
- conduct atmospheric dispersion modelling and noise monitoring to confirm compliance with applicable standards;
- implement corrective actions if monitoring indicates unexpected exceedances; and

- access to Ridley Island is restricted by PRPA, limiting access to the general public and minimizing exposure and effects on human health;
- maintain communication with neighbouring communities regarding construction activities and planned maintenance events that may temporarily increase noise or emissions.

Preliminary Consideration of Residual Effects

With the implementation of standard mitigations and commitments, effects on human health from Project-related changes in noise and air quality are expected to be negligible to not-significant. Temporary construction-related effects will be short-term, while operational effects are expected to remain within applicable regulatory and health-based criteria.

Because the Project is a brownfield development located within an existing industrial area and will employ modern emission controls and noise attenuation measures, it is not expected to result in measurable adverse effects on the health of nearby residents or Indigenous communities. The Project's contribution to cumulative regional noise and air quality effects is expected to be incremental relative to existing industrial and transportation activities.

Results of the Human Health Assessment will be shared with Nations.

Key Issue 9

Concerns about the adverse effects from the influx of workforce on social infrastructure and community services, including an increased demand for housing, health services, social services, transportation, policing and emergency services and changes to community dynamics. Provide additional information on the potential effects arising from workforce influxes, as well as information on the off-site work camp (including location, capacity, duration and ownership), transportation between the camp and project site, and operating arrangements between the proponent and the work camp provider.

Trigon Response

The Project is located on a brownfield site within an existing industrial area in Prince Rupert. Construction will require a large temporary workforce (~250 people at peak construction), while the operational workforce will be substantially smaller (40 people). Given the Project's location adjacent to an established urban centre with existing industrial and supply infrastructure, the Project is expected to result in a relatively limited workforce influx compared to a greenfield resource development in a remote location.

Trigon's workforce accommodation strategy of using a third party operated camp, busses to and from the camp, and on-site emergency response services is intended to minimize potential effects on local housing, community services, transportation infrastructure, and community well-being while maximizing opportunities for local and regional employment.

Workforce Influx

The temporary construction workforce may increase demand for accommodation prior to the establishment of the camp, transportation, commercial services, and recreational facilities within the Prince Rupert area. Potential social effects associated with workforce influx include:

- increased demand for temporary accommodation prior to the establishment of the camp;
- increased traffic on local roadways;
- increased use of local businesses and community services;
- potential increases in demand for emergency and health services for incidents that cannot be handled on-site;
- increased recreational use of public lands and waters; and
- increased interactions between workers and local and Indigenous communities.

Given the Project's brownfield nature and relatively modest construction workforce, these effects are expected to be temporary and manageable. The Project will prioritize recruitment of local, regional, and Indigenous workers, where qualified and available which is expected to reduce the number of non-local workers requiring temporary accommodation.

Worker Accommodation

The Project is expected to accommodate non-local construction personnel at a third-party operated commercial workforce accommodation facility located within the Prince Rupert or Port Edward area or another suitable location within the regional labour market.

At this stage of Project planning, the specific accommodation provider has not been selected. Once detailed construction planning is complete, Trigon will finalize accommodation arrangements based on workforce requirements, accommodation availability, and commercial agreements.

Information regarding the accommodation facility, including its location, ownership, capacity, duration of use, and operating arrangements, will be confirmed prior to construction and will be shared with Nations and stakeholders. The selected accommodation facility will be required to comply with applicable municipal, provincial, and federal regulatory requirements.

Transportation Between the Accommodation Facility and the Project Site

For the majority of the construction workforce, transportation between the accommodation facility and the Project site will be coordinated by Trigon or its contractors using organized shuttle services or other managed transportation arrangements.

The objectives of the transportation strategy are to:

- reduce individual vehicle use;
- minimize traffic congestion;
- improve worker safety;
- reduce greenhouse gas emissions;
- minimize parking requirements at the Project site; and
- reduce interactions between Project traffic and the public.

Transportation schedules will be coordinated with construction shift changes to minimize peak traffic periods where practicable.

Operating Arrangements

Once a commercial accommodation has been selected, Trigon will establish contractual arrangements that define expectations for worker accommodation, transportation, health and safety, security, emergency response, and environmental management. Trigon will require contractors and accommodation providers to implement:

- worker codes of conduct;
- cultural awareness and Indigenous relations training;
- policies respecting local communities and Indigenous rights;
- substance use management requirements;
- incident reporting procedures;
- security protocols;
- waste management procedures; and
- emergency response and evacuation procedures.

Trigon will retain responsibility for ensuring that contractor activities are consistent with Project commitments and applicable regulatory requirements.

Mitigation Measures

To minimize potential effects associated with workforce influx, the Project will adopt proven effective mitigation measures including:

- prioritize employment of qualified local, regional, and Indigenous workers;
- utilize an existing commercial work camp accommodation where practicable rather than constructing a new work camp;
- implement a Workforce Management Plan addressing accommodation, transportation, worker conduct, community interactions, and emergency response;
- provide mandatory worker orientation, including cultural awareness and respect for Indigenous rights and local communities;
- implement a worker Code of Conduct that establishes expectations for behaviour both on and off the worksite;
- provide organized transportation between accommodation and the Project site, where appropriate;
- communicate regularly with local governments, Indigenous Nations, businesses and service providers regarding workforce planning;
- encourage workers to utilize local businesses and services responsibly; and
- establish procedures for receiving and responding to community concerns related to workforce activities.

Preliminary Consideration of Residual Effects

The Project is expected to result in a temporary increase in the construction workforce; however, because it is a brownfield development in an established industrial area workforce-related effects are expected to be limited. The use of a third-party run workcamp, combined with local hiring initiatives and implementation of a Workforce Management Plan, is expected to minimize demands on housing and community infrastructure.

With the implementation of standard mitigations and commitments, effects on local communities and Indigenous communities from workforce influx are expected to be negligible to not significant. As detailed engineering and construction planning progress, Trigon will continue to engage with Indigenous Nations, local governments, and accommodation providers to confirm workforce logistics and implement measures to address any Project-specific concerns.

Key Issue 10

Concerns about the health, safety, and security of Indigenous women, girls, and Two-Spirit people from workforce influxes, including gender-based violence, harassment, exploitation and human trafficking, which may also exacerbate existing concerns along the Highway 16 corridor. Provide information about potential risks to more vulnerable sub-populations including Indigenous Women, Girls, and Two-Spirit and gender-diverse people, including measures to ensure safe workplaces and community safety, and approaches to engage affected communities.

Trigon Response

The Project recognizes that large industrial developments, including temporary construction activities and workforce changes, may have different effects across populations. In particular, Indigenous Women, Girls, and Two-Spirit and gender-diverse people (IWG2S+), as well as other vulnerable community members, may experience unique risks associated with changes in community dynamics, workforce influxes, increased transient populations, and interactions between workers and local communities.

Potential risks associated with workforce activity, worker accommodation, transportation, and community interactions will be considered throughout Project planning, construction, operation, and decommissioning of the Project.

Trigon will incorporate an inclusive and culturally appropriate approach to identifying and managing potential risks, informed by engagement with potentially affected Indigenous Nations, Indigenous organizations, local governments, community service providers, and other relevant stakeholders.

Potential Risks to Indigenous Women, Girls, and Two-Spirit and Gender-Diverse People:

A temporary increase in the Project workforce, particularly during construction, may result in changes to local population dynamics and increased interactions between workers and surrounding communities. Potential risks may include:

- increased demand on community-based support services, including health, social, and emergency services;
- increased potential for inappropriate behaviour, harassment, discrimination, or gender-based violence associated with transient workforces;
- increased concerns regarding safety in public spaces, transportation corridors, recreational areas, and community gathering places;
- increased pressure on housing availability and affordability, which may disproportionately affect vulnerable populations; and
- impacts to Indigenous women and gender-diverse people who may already experience elevated risks related to gender-based violence and social inequities.

Trigon acknowledges that these risks require proactive prevention measures rather than reliance solely on incident response.

Workplace Safety and Inclusion Measures

Trigon has established workplace practices designed to promote a safe, respectful, and inclusive work environment for all employees, contractors, and subcontractors. These plans include:

- Workplace Violence and Harassment Prevention Program
- Employment Equity Self-Identification Program
- Continuing Education Plan
- Professional Development Credits
- Code of Conduct (incl Human Rights, Workplace Violence)
- Substance Abuse Policy
- Privacy Policy

Trigon will ensure the existing programs include or are updated to include:

- prohibition of harassment, discrimination, intimidation, and violence;
- mandatory worker orientation addressing respectful behaviour, cultural awareness, and expectations for interactions with Indigenous communities;
- training related to gender-based violence prevention and bystander awareness, where appropriate;
- clear procedures for reporting, investigating, and responding to workplace concerns;
- confidential reporting mechanisms;
- contractor requirements to meet Project safety and conduct expectations; and
- monitoring of workplace culture and performance throughout construction and operations.

Trigon will require contractors and subcontractors to demonstrate compliance with applicable occupational health and safety requirements and Project-specific commitments.

Community Safety Measures

Trigon will work with Indigenous Nations and local communities to identify and address potential community safety concerns associated with Project activities. Measures will include:

- development and implementation of a Workforce Management Plan;
- establishment of worker accommodation and transportation procedures that support safe interactions with surrounding communities;
- implementation of worker Codes of Conduct applicable both at the worksite and during off-site activities;
- communication of expectations regarding appropriate behaviour in local communities and public spaces;
- coordination with local service providers, where appropriate, to understand potential capacity concerns;
- procedures for receiving and responding to community concerns or complaints; and
- adaptive management if monitoring identifies unexpected social effects.

Where feasible, the Project will prioritize local and Indigenous employment opportunities to support community participation and reduce reliance on temporary non-local workers.

Indigenous Engagement and Participation

Trigon recognizes that Indigenous Nations have important knowledge regarding community needs, cultural protocols, and potential risks affecting Indigenous women, girls, and gender-diverse people. Engagement will continue throughout Project planning, construction, and operations to:

- understand community-specific concerns and priorities;
- identify culturally appropriate approaches to prevention and mitigation;
- incorporate Indigenous Knowledge, where shared;
- identify opportunities for Indigenous participation in monitoring and oversight; and
- support Indigenous-led approaches to community safety.

Engagement approaches may include discussions with Indigenous leadership, community representatives, Indigenous women's organizations, youth representatives, Two-Spirit and gender-diverse community members, and other groups identified by affected Indigenous Nations.

Trigon will seek guidance on appropriate engagement methods to ensure that diverse perspectives are represented and that engagement opportunities are accessible, inclusive, and culturally appropriate.

Monitoring and Adaptive Management

Trigon will monitor potential social effects associated with workforce activities and community interactions through:

- regular engagement with Indigenous Nations and local communities;
- tracking and responding to concerns raised through established communication channels;
- monitoring workplace safety performance;
- reviewing contractor compliance with Project commitments;
- assessing whether additional measures are needed to address emerging concerns; and
- implementing adaptive management measures where monitoring indicates that existing measures are insufficient.

Conclusion

The Project has the potential to create temporary changes in workforce presence and community interactions that may affect vulnerable populations, including Indigenous Women, Girls, and Two-Spirit and gender-diverse people. These risks are expected to be manageable through proactive planning, inclusive workplace practices, worker education, community engagement, and implementation of appropriate safety measures.

Trigon recognizes that safety and well-being outcomes cannot be addressed solely through technical environmental mitigation and will continue to work collaboratively with Indigenous Nations, local communities, and service providers to identify and address concerns throughout the Project lifecycle. Through these measures, the Project aims to support a safe, respectful, and inclusive environment for workers, Indigenous communities, and surrounding communities.

Key Issue 11

Concerns about procurement, employment, business and training opportunities for Indigenous peoples (especially Indigenous women), Two-Spirit and gender-diverse people, and concerns that local communities bear the impacts of development without receiving a fair share of associated economic and social benefits. Provide clarity on whether net increase in employment from existing operations is anticipated, as well as information on targeted measures to ensure equitable distribution of project benefits.

Trigon Response

The Project recognizes the importance of ensuring that Indigenous peoples, including Indigenous women, Two-Spirit and gender-diverse people, as well as local communities, have meaningful opportunities to participate in and benefit from the proposed LPG export facility. The Project also recognizes the concern that communities hosting development should receive a fair share of the associated economic and social benefits.

The Project is expected to provide additional economic opportunities through new employment, procurement, contracting, training, and related business activities.

Employment and Training Opportunities

The Project is expected to create approximately 40 new full-time positions associated with the operation of the LPG export facility. These positions are expected to represent a net increase in employment associated with the proposed Project, rather than simply the transfer or replacement of existing positions at Trigon.

In addition to the approximately 40 full-time operational positions, the Project is expected to generate temporary employment opportunities (250 jobs at peak construction) during construction and project implementation. The number and duration of construction positions will depend on the final design, construction schedule, contracting strategy, and project execution approach.

The Project will seek to maximize local and Indigenous participation in these opportunities through measures such as:

- identifying employment opportunities and required skills sufficiently in advance of construction and operations;
- engaging with Indigenous communities and local employment organizations to identify qualified candidates and identify strategies to increase Indigenous participation and interest;
- engaging with Indigenous communities and local employment organizations to identify the right programs, training, and recruitment options;
- providing or supporting skills development, apprenticeships, job-readiness programs, and other training opportunities where appropriate;
- identifying opportunities to reduce barriers to participation for Indigenous peoples and other underrepresented groups; and
- monitoring employment and training outcomes to identify opportunities for continuous improvement.

Particular attention will be given to creating meaningful opportunities for Indigenous women, Two-Spirit and gender-diverse people, including through inclusive recruitment, training, and workplace practices.

Procurement and Business Opportunities

The Project will seek to maximize opportunities for Indigenous-owned and local businesses to participate in the Project supply chain. Potential opportunities may include construction services, transportation and logistics, environmental services, catering, maintenance, professional services, equipment supply, and other goods and services required during construction and operations.

Where practicable, the Project will consider measures such as early communication of procurement opportunities, supplier engagement sessions, appropriate packaging of contracts, capacity-building initiatives, and transparent procurement processes that enable Indigenous and local businesses to compete effectively.

The Project will also explore opportunities to establish measurable Indigenous and local procurement objectives as the procurement strategy is finalized. These objectives can help provide greater transparency regarding the extent to which Project expenditures generate benefits for Indigenous and local businesses.

Equitable Distribution of Project Benefits:

The Project recognizes that communities hosting development should have meaningful opportunities to benefit from the associated economic activity. Accordingly, the Project will seek to support an equitable distribution of benefits through employment, training, Indigenous and local procurement, business development, and other initiatives identified through engagement.

Trigon will continue engagement with potentially affected Indigenous communities, including Indigenous women and Two-Spirit and gender-diverse people, to better understand barriers to participation and identify measures that can support meaningful access to Project-related opportunities.

The effectiveness of these measures may be monitored through indicators such as the number of Indigenous and local employees, training participation, Indigenous and local procurement expenditures, and participation of Indigenous-owned businesses. Where appropriate, the results of this monitoring can be used to identify gaps and inform additional measures throughout the construction and operational phases.

Overall, the Project is expected to provide approximately 40 new full-time operational positions**,** in addition to 250 jobs at peak construction, as well as indirect economic opportunities. Trigon is committed to maximizing Indigenous and local participation in these opportunities and to implementing measures that support meaningful and equitable access to the economic benefits associated with the Project.

Workplace Safety and Inclusion Measures

Trigon has established workplace practices designed to promote a safe, respectful, and inclusive work environment for all employees, contractors, and subcontractors. These plans include:

- Workplace Violence and Harassment Prevention Program

- Employment Equity Self-Identification Program
- Continuing Education Plan
- Professional Development Credits
- Code of Conduct (incl Human Rights, Workplace Violence)
- Substance Abuse Policy
- Privacy Policy

Trigon will ensure the existing programs include or are updated to include:

- measures specific to Indigenous peoples (especially Indigenous women), Two-Spirit and gender-diverse people
- prohibition of harassment, discrimination, intimidation, and violence;
- mandatory worker orientation addressing respectful behaviour, cultural awareness, and expectations for interactions with Indigenous communities;
- training related to gender-based violence prevention and bystander awareness, where appropriate;
- clear procedures for reporting, investigating, and responding to workplace concerns;
- confidential reporting mechanisms;
- contractor requirements to meet Project safety and conduct expectations; and
- monitoring of workplace culture and performance throughout construction and operations.

Trigon will require contractors and subcontractors to demonstrate compliance with applicable occupational health and safety requirements and Project-specific commitments.

First Aid and Medical Response

Trigon has first aid resources and trained personnel available on site to respond to injuries and medical emergencies. Minor injuries are assessed and treated by Trigon's first aid personnel, while serious or potentially life-threatening injuries are stabilized to the extent possible and promptly transported or referred to a local hospital for further medical assessment and treatment. This approach ensures that appropriate first aid is available at the worksite while more severe injuries receive the level of care available through the local healthcare system.

Key Issue 12

Concerns about adverse effects to Indigenous and local economic well-being, traditional marine harvesting opportunities, and community income due to increased labour demand and workforce pressures that drive up construction and labour costs, as well as increased recreational fishing activity that competes with and reduces access to traditional fishing resources. Provide additional information on potential adverse effects to Indigenous and local economic well-being as a result of changes to labour demand and workforce pressures.

Trigon Response

The Project has the potential to generate positive and adverse economic effects associated with changes in labour demand, employment opportunities, contracting activity, and pressure on local and regional services. The Project will build upon existing industrial capacity and infrastructure, while also creating temporary and ongoing employment, contracting, procurement, and indirect economic opportunities.

Trigon recognizes that economic effects may be experienced differently among Indigenous Nations, local communities, businesses, workers, and vulnerable populations.

Potential Effects During Construction

Construction of the Project will result in increased demand for skilled and semi-skilled labour, equipment, materials, and services. Potential adverse effects associated with increased labour demand and workforce pressures may include:

- increased competition among employers for qualified workers, particularly in skilled trades and industrial occupations;
- reduced availability of workers for existing local industries, including marine, fisheries, forestry, tourism, and other resource sectors;
- increased competition for local contractors, suppliers, and service providers;
- potential labour shortages affecting Indigenous businesses and smaller local companies that may have limited workforce capacity;
- increased demand for housing, accommodations, transportation, and community services; and
- potential increases in wages and costs for goods and services due to increased demand.

These effects may be more pronounced for smaller communities and Indigenous businesses with limited labour pools, where the loss of even a small number of skilled workers could affect existing operations.

Indigenous Economic Participation

The Project may provide opportunities for Indigenous economic participation through:

- employment and training opportunities;
- contracting and procurement opportunities;
- partnerships with Indigenous-owned businesses;
- skills development and apprenticeship opportunities; and
- participation in environmental monitoring and stewardship activities.

At the same time, increased demand for labour and services may create challenges for Indigenous communities and businesses, including:

- competition for workers between Project opportunities and existing Indigenous businesses or community services;
- difficulty retaining workers if individuals leave existing employment for potentially higher-paying Project positions;
- increased costs for Indigenous businesses competing for labour, equipment, or accommodation; and
- potential capacity constraints that limit the ability of Indigenous businesses to participate fully in Project opportunities.

Trigon will work with Indigenous Nations to identify opportunities and address barriers to participation, recognizing that economic benefits must be balanced with maintaining existing community economic activities and priorities.

Workforce Pressures and Community Economic Effects

A temporary construction workforce may increase demand for local goods and services, which may provide economic benefits to businesses in Prince Rupert and surrounding communities. However, potential adverse effects may include:

- increased competition for accommodations, particularly during peak construction periods;
- increased demand for restaurants, retail services, transportation, and health services;
- potential cost increases for housing, goods, and services;
- challenges for local employers attempting to retain workers; and
- increased pressure on municipal and community infrastructure.

Because the Project is located near an established community with existing industrial development, workforce-related pressures are expected to be lower than those associated with remote projects requiring large new camps and infrastructure. The use of local and regional workers, where available, will also reduce impacts from temporary non-local labour. Current construction schedules suggest that CANXPORT and REEF will be complete when Trigon LPG enters construction, which will mitigate some of the pressure on the local labour force and communities.

Operational Workforce Effects

Once operational, the Project is expected to require a smaller, long-term workforce compared with the construction phase. Potential effects during operations include:

- ongoing demand for specialized industrial skills;
- competition with other industries for experienced operators and tradespeople;
- potential wage pressures within certain occupational categories; and
- opportunities for long-term employment and career development.

The operational workforce is not expected to create the same level of temporary labour pressure as the construction phase due to the smaller number of permanent positions.

Mitigation Measures

Trigon will implement measures to reduce potential adverse effects associated with labour demand and workforce pressures, including:

- Hosting the majority of the construction workforce in a third-party operated camp, local hotels or accommodation providers experienced with servicing construction teams;
- developing a local and Indigenous employment strategy;
- engaging with Indigenous Nations regarding employment, training, and contracting priorities;
- identifying opportunities for apprenticeships, skills development, and capacity building;
- communicating anticipated workforce requirements to local communities and service providers;
- prioritizing local and regional hiring where qualified workers are available;
- supporting Indigenous and local business participation through procurement planning and early communication of contracting opportunities;

- working with contractors to avoid unnecessary competition for limited local resources;
- monitoring workforce requirements and community concerns throughout construction;
- implementing workforce accommodation and transportation plans to reduce pressure on local infrastructure; and
- maintaining communication with local governments, Indigenous nations, and economic development organizations.

Conclusion

Following implementation of mitigation measures, the Project is expected to result in both positive economic benefits and manageable adverse effects related to labour demand and workforce pressures.

Potential residual adverse effects may include localized competition for skilled labour, temporary pressure on housing and services, and increased demand for local business capacity during peak construction. These effects are expected to be temporary and concentrated during the construction phase.

The Project is also expected to provide longer-term economic opportunities through employment, procurement, training, and Indigenous participation. Because the Project is located within an existing industrial area, the magnitude of workforce-related pressures is expected to be lower than for a new remote development requiring substantial new infrastructure and a large permanent workforce.

Trigon will continue to engage with Indigenous nations and local communities to identify economic priorities, monitor workforce-related effects, and implement adaptive measures to support positive economic outcomes while minimizing adverse effects on Indigenous and local economic well-being.

INDIGENOUS ENGAGEMENT

Key Issue 13

Concerns about the mischaracterization of consent, support, or endorsement in connection with economic participation in the project through equity agreements. Provide additional clarity about the proponent's engagement with Indigenous groups as it relates to discussions concerning consent or support for the project.

Trigon Response

Trigon acknowledges that support to proceed with submitting the Initial Project Description to IAAC expressed by Lax Kw'alaams Band and Metlakatla First Nation economic development representatives on Trigon's Board should not be interpreted as a statement of unanimous community support.

The intent of the statements in the IPD was to describe these discussions while simultaneously affirming Trigon's strong commitment to ongoing engagement and consultation throughout the IAAC process with elected leadership, stewardship organizations, rights holders, and community members. This information has been removed from the IPD (and plain language summary) for clarity, and Trigon is working with these Nations to ensure concerns are addressed.

SPECIES AT RISK

Key Issue 14

Concerns about potential effects on species at risk, such as Little Brown Myotis, including the loss or disturbance of habitat and sensory disturbances. Provide a list of potentially affected species at risk and their listed status, any residences and/or critical or suitable habitat, including anthropogenic habitat, which may interact with the project, and describe how they may be adversely affected by the project.

Trigon Response

The Project is being built within an existing industrial area on Ridley Island and will utilize existing industrial infrastructure, including the existing marine jetty. No infrastructure will need to be demolished to make way for the new work. Re-purposing the site will be limited to removing the existing coal pile and then laying a layer of crushed gravel to create a graded site to start building up from. As such, potential effects on species at risk are expected to be primarily associated with incremental changes to existing conditions, including temporary construction disturbance, operational noise and lighting, marine transportation, and potential accidental events. The Project is not expected to result in habitat loss or fragmentation because development will occur within a previously disturbed industrial footprint.

Baseline studies and previous environmental assessments in the Prince Rupert area have identified only little brown myotis (blue-listed; SARA Endangered *Myotis lucifugus*) and Barn swallow (*Species at Risk Act* (SARA) Threatened; *Hirundo rustica*) as potentially affected species at risk that use the area within the Project footprint for forage. No roosting or nesting sites exist for either (Stantec 2025 and Ausenco 2026)[16].

Bats – Little Brown Myotis

The little brown myotis is listed as Endangered under SARA and is provincially blue listed. Previous studies have identified this species in the broader Prince Rupert region; however, no suitable bat roosting habitat has been identified within the Project footprint.

Potential Project-related effects are expected to be limited and may include:

- Temporary disturbance from construction noise and activity if bats forage in the project footprint or in adjacent areas;
- Changes in insect prey availability due to changes in lighting or localized habitat conditions;
- Lighting effects that may alter bat movement patterns or foraging behaviour near the facility; and
- Operational noise or human activity that could influence use of adjacent habitats.

Because no known roosting habitat occurs within the Project footprint, the Project is not expected to result in direct loss of maternity roosts, overwintering sites, or critical roost habitat. Potential effects will be limited to possible changes in foraging habitat.

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[16]Ausenco, 2026. LPG Bat and Amphibian Assessment. August 2026
Stantec, 2025. Trigon – Wildlife Habitat Survey and Bat Emergence Survey. January 2025.

Mitigation measures will include:

- avoiding vegetation clearing outside the existing industrial footprint;
- implementing wildlife-friendly lighting practices, including minimizing light spill into adjacent natural areas;
- maintaining existing habitat features outside the Project footprint; and
- conducting additional surveys if previously unidentified habitat features are identified during detailed design or during construction.

Birds and Migratory Birds - Barn Swallow

Ridley Island provides habitat for a variety of migratory and resident bird species. The Project site itself is located within an existing industrial area, and previous assessments indicate that suitable nesting habitat for species at risk does not exist within the Project area except for barn swallow (*Hirundo rustica*), where the potential habitat is limited to one site: the existing jetty pipe rack where the Project piping will tie into the existing LPG jetty loading line. However, surrounding portions of Ridley Island provide nesting and foraging habitat.

Barn swallows are listed as Threatened under SARA and may use anthropogenic structures for nesting. Because barn swallows can nest on buildings, bridges, and other infrastructure, there is potential for interaction with existing industrial structures.

Potential effects include:

- disturbance or destruction of active nests if buildings or structures are modified or removed;
- disturbance from construction activity (e.g. noise and lighting) near nesting locations.

Mitigation measures may include:

- completing pre-construction nesting surveys where suitable structures are present;
- during construction when the pipe connecting the facility is tied into the existing LPG jetty loading pipe, a qualified biologist will conduct a final wildlife sweep of the tie in point to confirm no barn swallows have nested there. If a nest is located, then active nests will be protected through the establishment of species-appropriate setback distance until nesting has concluded, and the interconnection work will be delayed to outside the occupancy period.
- avoiding disturbance to active nests during the breeding season where feasible;
- implementing appropriate nest protection measures if nests are identified; and
- incorporating bird-friendly lighting and building design practices.

Because the Project will occur within a previously disturbed industrial area, direct habitat loss is not expected or can be avoided entirely. Wildlife studies indicate that at this time, barn swallows are not nesting on the jetty pipe rack where the Project will tie into the existing LPG loading line. During construction when the LPG loading pipe from the facility is tied into the existing LPG jetty loading pipe, a final wildlife sweep of the tie in point will be conducted to confirm no barn swallows have nested there. If a nest is located, then the work will be delayed to outside the occupancy period.

Summary of Potential Effects and Mitigation

Species Group	Potential Effects	Key Mitigation Measures
Little brown myotis	Disturbance, lighting effects, changes to foraging habitat	Wildlife-friendly lighting, avoid unnecessary habitat disturbance, confirm habitat presence
Barn swallow	Disturbance or destruction of nest	Wildlife sweep on key habitat features prior to works, timing of works

Preliminary Consideration of Residual Effects

Given the Project's brownfield location, use of existing infrastructure, and limited requirement for habitat disturbance, potential effects on SARA-listed and provincially listed species are expected to be primarily associated with sensory disturbance, lighting, and accidental event risks rather than direct habitat loss. No residences and/or critical habitat has been identified in the Project footprint.

With implementation of mitigation measures, including wildlife management procedures, Trigon's commitments to bird protection measures, spill prevention, environmental monitoring, effects on species at risk in the Project area are expected to be negligible to not significant.

MALFUNCTIONS OR ACCIDENTS

Key Issue 15

Concerns about potential releases of hazardous substances, loss of containment from LPG storage systems, rail unloading failures, marine transfer incidents, fires, explosions, or catastrophic process failures, which may result in adverse effects to human health, community safety, Indigenous rights and interests, cultural values, and the environment. Provide additional information on any response plans that address potential accidents and malfunctions.

Trigon Response

The Project will be developed on a brownfield site within an existing industrial area and will utilize existing marine terminal infrastructure, including an existing jetty. The Project will be designed, constructed, and operated in accordance with applicable federal and provincial regulatory requirements, industry standards, and recognized best practices for the handling, storage, transportation, and export of LPG.

Trigon recognizes that, while the likelihood of accidents and malfunctions is low, credible scenarios must be considered and appropriate prevention, preparedness, response, and recovery measures must be established. Emergency response planning will address potential incidents associated with Project construction, facility operations, rail transportation, and marine shipping.

Emergency Response Planning Approach

Trigon will update and implement its existing integrated Emergency Preparedness and Response Plan (EPRP) prior to Project operations. The EPRP will establish procedures for preventing, preparing for, responding to, and recovering from potential accidents and malfunctions associated with LPG.

The ERP will include:

- identification of credible accident and malfunction scenarios;
- roles and responsibilities of Project personnel and contractors;
- emergency communication procedures;
- notification requirements for regulators, emergency responders, Indigenous Nations, and other potentially affected parties;
- emergency equipment requirements;
- response training and exercises;
- coordination with local and regional emergency services;
- incident reporting and investigation procedures; and
- procedures for updating the EPRP based on lessons learned and changing conditions.

The ERP will be updated in consultation with relevant regulatory agencies, emergency response organizations, and potentially affected Indigenous Nations, where appropriate. IAAC Standard Mitigation Measures for Accidents and Malfunctions will also be adopted where relevant.

Potential Accident and Malfunction Scenarios

LPG Release and Fire Events

The primary operational risk associated with an LPG export facility is the potential accidental release of LPG during storage, processing, transfer, or loading activities.

Potential causes may include:

- equipment failure;
- pipeline or piping leaks;
- valve or flange failures;
- loading arm failures;
- operator error;
- external damage; or
- extreme weather events.

Potential consequences may include:

- vapour and/or liquid LPG release;
- pool fire or vapour cloud fire;
- localized thermal radiation effects;
- temporary air quality impacts; and
- temporary restrictions within the immediate facility area.

The Project design will incorporate multiple layers of protection to prevent and mitigate LPG releases, including:

- engineered facility built to Canadian standards and codes;
- pressure relief systems;
- emergency shutdown systems;
- gas detection and fire detection systems;
- automated isolation systems;
- fire suppression systems;
- controlled access and exclusion zones;
- 24/7 staffed operations and operator rounds;
- regular inspection and preventative maintenance programs; and
- trained emergency response personnel.

The use of an internal ground flare will further reduce potential effects associated with routine flaring by providing controlled combustion within an enclosed system.

Marine Shipping Incidents

The shipping of LPG will be handled by third-party marine vessels. Trigon does not own the LPG being exported and does not have care and control over the vessels. The vessels will be required to comply with guidance from PRPA, the PPA, and applicable Acts and regulations. Potential marine accidents could include:

- vessel collision;
- grounding;
- loss of propulsion or steering;
- marine fuel spill;
- LPG transfer equipment failure;

- adverse weather-related incidents; and
- vessel loading emergencies.

Potential effects could include:

- temporary restrictions on marine access;
- impacts to marine water quality;
- effects on fish, marine mammals, seabirds, and Indigenous harvesting activities; and
- temporary disruption of marine transportation.

Mitigation and response measures will include:

- compliance with Port of Prince Rupert requirements;
- use of tethered tugs while in transport;
- use of certified vessels and trained crews;
- mandatory pilotage requirements where applicable;
- navigation and communication procedures;
- loading arm operation preventative safety measures;
- loading arm emergency release couplings;
- ship-to-shore emergency communication systems;
- spill prevention and response procedures;
- marine emergency response equipment;
- coordination with Canadian Coast Guard and other response agencies; and
- participation in regional marine emergency response planning.

Because the Project will use an existing jetty and established shipping routes, no new marine navigation risks associated with construction of new marine infrastructure are anticipated.

Rail Transportation Incidents

Within Trigon's yard, where Trigon is responsible for moving rail cars, there are established policies and procedures for safely moving LPG rail cars as well as emergency response as outlined in Appendix A. With regards to potential rail unloading incidents, please see mitigation described in the 'LPG Release and Fire Events' section above.

Accidents and malfunctions related to LPG being transported to the facility by a third-party rail operator (CN) may include:

- railcar derailment;
- damage to LPG railcars;
- accidental release of LPG;
- fire or explosion; and
- transportation-related incidents at crossings or along existing rail corridors.

Potential consequences may include localized safety risks, environmental impacts, and temporary disruption to transportation routes.

Mitigation measures adopted by CN include:

- compliance with federal rail safety regulations;
- use of approved LPG railcars;
- inspection and maintenance programs;
- qualified rail operators;
- emergency response procedures for dangerous goods;

- coordination with railway operators and emergency responders, including ERAC (Emergency Response Assistance Canada); and
- community notification procedures where appropriate.

Construction-Related Accidents and Malfunctions

Potential construction-phase incidents may include:

- fuel or hazardous material spills;
- equipment failures;
- fires;
- vehicle collisions;
- worker safety incidents; and
- accidental disturbance of environmental features.

Construction management measures will include:

- spill prevention and response procedures;
- secondary containment systems;
- hazardous materials management plans;
- equipment inspection requirements;
- contractor environmental management plans;
- emergency response training;
- site access controls; and
- reporting and corrective action procedures.

Spill Prevention and Response

The Project will implement spill prevention and response measures for hazardous materials, fuels, and process fluids during construction, operations, and decommissioning. These measures will include:

- secondary containment systems;
- appropriate storage and handling procedures;
- spill response equipment maintained on site;
- trained personnel;
- routine inspections;
- emergency reporting procedures; and
- coordination with external spill response contractors where required.

Existing marine spill response planning will be updated with applicable federal requirements and regional response organizations.

Indigenous and Community Engagement in Emergency Planning

Trigon recognizes that accidents and malfunctions may have particular implications for Indigenous communities that rely on surrounding lands and waters for harvesting, cultural activities, and travel where access is not restricted by PRPA.

Emergency planning will include opportunities to:

- engage potentially affected Indigenous Nations regarding emergency preparedness;
- incorporate Indigenous Knowledge, where shared, into response planning;
- identify communication protocols during emergencies;

- consider Indigenous priorities related to protection of culturally important areas and resources;
- support participation in emergency response exercises where appropriate; and
- communicate incident information in a timely and accessible manner.

Trigon will also engage with local communities, municipalities, and provincial emergency response organizations to support coordinated emergency preparedness.

Monitoring, Training, and Continuous Improvement

Trigon will maintain emergency preparedness through:

- regular employee and contractor training;
- emergency drills and exercises;
- inspection and maintenance programs;
- review of incident response performance;
- coordination with emergency response agencies; and
- updates to emergency plans based on operational experience and regulatory requirements.

Conclusion

The Project will incorporate comprehensive prevention and response measures to address potential accidents and malfunctions associated with LPG processing, storage, marine loading, rail transportation, and construction activities. Although credible accident scenarios exist, the Project will be designed with multiple layers of protection, including engineered safeguards, operational controls, emergency response procedures, and coordination with external responders.

Given the use of an existing industrial site and marine infrastructure currently handling LPG, application of established safety standards, and implementation of an integrated Emergency Response Plan, potential adverse effects associated with accidents and malfunctions are expected to be low probability, localized, and manageable. Trigon will continue to engage with Indigenous Nations, regulators, emergency responders, local communities and the Province to ensure emergency planning reflects local conditions and priorities.

Key Issue 16

Concerns about the potential for marine incidents (e.g., collisions, groundings, fires, explosions, and LPG/hazardous and noxious substances releases) and the adequacy of specialized emergency preparedness, response capacity, and coordination. Provide information on the proposed emergency preparedness and response plan for the project.

Trigon Response

Trigon recognizes the importance of robust emergency preparedness and response measures to address potential marine incidents associated with the Project, including vessel collisions, groundings, fires, explosions, and releases of LPG or other hazardous and noxious substances. Responsibility for these sorts of incidents is allocated or shared between a number of organizations and jurisdictions thus requiring clear delegation, coordination and communication protocols. LPG has been safely handled and exported from Prince Rupert since 2019, and Trigon

will update and implement its existing emergency preparedness and response measures appropriate to the nature, scale, and location of the Project and will coordinate these measures with applicable regulatory requirements and relevant emergency response organizations and authorities.

The Project's emergency preparedness and response planning will be informed by a systematic assessment of credible marine and terminal-related hazards, including potential initiating events, consequences, response requirements, and the availability of appropriate response resources. The planning will consider the characteristics of LPG, the marine terminal and associated infrastructure, vessel operations, navigational conditions, and potential interactions between Project activities and other users of the marine environment.

Trigon will update its existing Emergency Preparedness and Response Plan (EPRP) that establishes the framework for preventing, preparing for, responding to, and recovering from emergencies associated with the Project. The EPRP will be developed in accordance with applicable federal, provincial, and local legislative and regulatory requirements and will incorporate relevant requirements and guidance from the applicable marine, transportation, environmental, and emergency management authorities.

The EPRP will address, as applicable:

- roles, responsibilities, authority, and lines of communication for emergency response personnel;
- procedures for initial notification, incident assessment, escalation, and activation of the emergency response organization;
- coordination and communication with relevant federal, provincial, and local authorities, Indigenous communities and organizations, emergency services, marine response organizations, and other potentially affected parties;
- response procedures for marine incidents, including vessel collisions, groundings, fires, explosions, loss of containment, and releases of LPG or other hazardous and noxious substances;
- measures for fire detection, firefighting, isolation, shutdown, and control of potential sources of ignition;
- procedures for managing LPG releases, including hazard identification, establishment of appropriate exclusion or control zones, and coordination of specialized response resources;
- procedures for spill response and environmental protection, including notification, containment and recovery, where technically appropriate, and monitoring;
- emergency evacuation, shelter-in-place, personnel accountability, and other life-safety measures;
- availability and mobilization of specialized equipment, personnel, and external response resources;
- incident command, communications, and coordination arrangements to support an integrated response;
- protection of workers, the public, marine users, and the environment during emergency response activities; and
- incident investigation, reporting, recovery, and incorporation of lessons learned into the Project's emergency management system.

Trigon will also affirm existing or establish updated arrangements with external emergency response agencies (including PRPA, the Coast Guard, Western Canada Marine Response Corp) and specialized marine and hazardous materials response resources, as required. The nature and level of response resources will be informed by the Project's risk assessments and applicable regulatory requirements. Where an incident exceeds the capabilities of the Project's on-site response organization, the EPRP will provide for escalation and mobilization of external resources and coordination with the agencies having jurisdiction and/or specialized response capabilities.

Emergency preparedness will be maintained through training, exercises, inspections, equipment maintenance, and periodic review and updating of the EPRP. Exercises will be designed, as appropriate, to test communication, notification, incident command, coordination, evacuation, firefighting, spill response, and mobilization of external resources. Trigon will use the results of exercises and any actual incidents to identify opportunities for continuous improvement.

Marine emergency response will also be integrated with the applicable requirements and response arrangements governing vessels calling at the terminal. Trigon will coordinate with PRPA (including PRPA's Emergency Management Plan), vessel operators, pilots, tug operators, marine service providers, and other relevant authorities, as appropriate, to support safe navigation and effective response to marine emergencies. Much of this framework is already in existence and operational.

Trigon recognizes that effective emergency preparedness and response depend on coordination among multiple organizations and jurisdictions. Accordingly, the EPRP will be developed and maintained as a coordinated framework with key stakeholders rather than as a stand-alone Trigon response. Engagement with relevant authorities, Indigenous groups, emergency responders, and other stakeholders will inform the development and refinement of emergency response procedures and communication protocols.

Through these measures, Trigon will seek to ensure that the Project is supported by a comprehensive and scalable emergency preparedness and response framework capable of addressing credible marine and terminal emergencies, including low-probability, high-consequence events. Detailed emergency response procedures, response resources, and coordination arrangements will be further developed as Project design and engineering progress and in accordance with applicable regulatory and permitting requirements.

Key Issue 17

Concerns about rail safety (e.g., collisions and train derailments) and emergency response preparedness. Provide information on anticipated train volumes, available rail capacity, and proposed emergency preparedness and response plan for the project.

Trigon Response

Trigon recognizes the importance of rail safety and emergency preparedness in the development and operation of the Project. Trigon acknowledges the potential for rail-related incidents, including train collisions, derailments, fires, and releases of hazardous materials, and will incorporate appropriate measures to prevent and respond to such incidents.

Rail transportation for the Project is anticipated to be undertaken in accordance with applicable federal and provincial legislation, regulations, standards, and railway operating requirements. Trigon will work with CN and relevant authorities to confirm that rail movements associated with the Project can be safely accommodated within the available rail infrastructure and capacity.

Anticipated Train Volumes and Rail Capacity

The Project will receive approximately one unit train of LPG by rail daily.

Trigon will work with the third-party rail operator (CN) to assess available rail capacity and identify any infrastructure, operational, or scheduling requirements necessary to accommodate Project-related rail traffic safely and efficiently. This will include consideration of the capacity of the rail network and terminal infrastructure, as well as the potential need for operational controls or other measures to manage Project-related rail movements.

Rail operations within the Project area, once rail cars are turned over by CN, will be subject to Trigon's established operating procedures, safety management system, speed limits and applicable regulatory requirements. Trigon has been safely handling LPG rail cars within its yard since 2019. Trigon will coordinate with the railway operator to ensure that the interface between CN railway operations and the Project's terminal operations continues to be appropriately and safely managed.

Emergency Preparedness and Response

Trigon will develop and implement an Emergency Preparedness and Response Plan (EPR Plan) that addresses credible rail-related emergencies associated with the Project. The EPR Plan will be consistent with applicable regulatory requirements and will be developed in coordination with CN, PRPA, Emergency Response Assistance Canada (ERAC), the Province and other relevant emergency response organizations and authorities.

The EPR Plan will establish procedures and responsibilities for responding to potential rail incidents, including collisions, derailments, fires, loss of containment, and releases of LPG or other hazardous substances. The plan will address, as appropriate:

- procedures for incident notification, assessment, escalation, and activation of the emergency response organization;
- roles and responsibilities of Trigon, railway operator, emergency services, and other responding organizations;
- communication and coordination protocols with federal, provincial, and local authorities and emergency responders;
- procedures for isolating railcars, equipment, and affected areas and controlling potential sources of ignition;
- measures to protect workers, emergency responders, the public, and the environment;
- procedures for managing LPG and other hazardous material releases, including identification of hazards, establishment of appropriate control or exclusion zones, and mobilization of specialized response resources;
- emergency evacuation and personnel accountability procedures;
- access to appropriate emergency response equipment, personnel, and specialized external resources;
- incident command and coordination arrangements for multi-agency responses; and
- incident investigation, reporting, recovery, and incorporation of lessons learned.

Trigon recognizes that CN has primary responsibility for the safe operation and movement of trains and will maintain its own safety management and emergency response systems. The Project's EPR Plan will therefore be designed to complement, rather than duplicate existing emergency preparedness and response arrangements. Trigon will establish appropriate interfaces and protocols to facilitate a coordinated response, should an incident occur.

Emergency preparedness will be supported through training, drills and exercises, equipment inspections and maintenance, and periodic review and updating of the EPR Plan. Exercises will be used, as appropriate, to test notification procedures, communications, incident command, evacuation, coordination with external responders, and the mobilization of specialized resources.

CUMULATIVE EFFECTS

Key Issue 18

Concerns about potential adverse effects to Indigenous rights and interests, community well-being, infrastructure and services, environmental and human health, and access to traditionally used lands and resources due to the cumulative and long-term impacts of existing and reasonably foreseeable industrial development in the Prince Rupert region and associated marine shipping activities. Provide additional information about vessel calls, routing, tug movements, and cumulative increase of marine vessels relative to existing conditions within the Port of Prince Rupert and through to Dixon Entrance. Provide additional information on the relationship between the proponent and the operator responsible for marine shipping, including any ability of the proponent to direct or influence the activity.

Trigon Response

Trigon recognizes that marine shipping associated with the Project will occur within a broader regional context that includes existing and reasonably foreseeable industrial development and marine vessel activity in the Prince Rupert region. Trigon acknowledges the importance of considering cumulative effects and potential interactions with Indigenous rights and interests, community well-being, infrastructure and services, environmental and human health, and access to traditionally used lands and resources.

Vessel Calls and Marine Traffic

The Project is expected to result in additional vessel calls at the marine terminal associated with the export of LPG. The anticipated number of annual vessel calls is approximately four to five per month.

Project-related third-party vessels will be subject to applicable marine navigation and safety requirements, including requirements established by Transport Canada, the Pacific Pilotage Authority (PPA), the Prince Rupert Port Authority[17], and other authorities with jurisdiction. Vessels calling at the terminal will be required to comply with all requirements and regulations.

[17] https://www.rupertport.com/port-information-guide/

Tug Movements and Marine Support Activities

Marine operations associated with the Project will include tug and other marine support activities required for the safe manoeuvring, berthing, loading, and departure of vessels. The number and characteristics of tug movements depends on vessel size, operating conditions, terminal requirements, and established marine safety requirements. The PPA has conducted marine transit and berthing simulations for VLGCs at Trigon's berth under numerous weather scenarios to ensure the safe and secure movement of vessels. VLGCs carrying LPG have serviced Trigon's dock since 2019 with no notable safety or environmental incidents.

In the most recent PPA Notice to Industry (January 2026[18]), it is expected that the facility will continue to be serviced by tethered tugs from the Marine Terminal (Trigon Berth 1) to and from west of Rachael Islands and PRPA Harbour Limits to and from Triple Islands. As per current operations, local pilots with the PPA will board vessels at Triple Island. Trigon's Terminal Rules mandate a minimum berthing requirement of two 65 tonne bollard tubs and one line boat to be used for berthing. Outside of the mandatory tethered tug areas, the exact locations of tethering and un-tethering of tugs will be at the discretion of the Master and Pilots, as required in the prevailing conditions.

Trigon will continue to work with the relevant marine operators and authorities to characterize the anticipated tug movements associated with Project operations.

Trigon recognizes that tug movements and other support vessel activity may contribute to the overall level of marine traffic in the region.

Cumulative Marine Traffic

Trigon recognizes that the Project will be one component of a dynamic and evolving marine transportation system in the Prince Rupert region. The potential effects of Project-related third-party vessel traffic cannot be considered independently from existing and reasonably foreseeable marine traffic and industrial development. The evaluation and mitigation of cumulative effects of shipping is beyond any one proponent's capability.

Trigon supports initiatives by federal authorities to evaluate and address the cumulative impacts of shipping within the Port of Prince Rupert and along the relevant marine transportation routes toward Dixon Entrance. Trigon will be open to working constructively with these initiatives including sharing data.

Trigon will continue to engage with Indigenous groups and relevant authorities to better understand the use of the marine environment, including areas and activities that may be important for Indigenous rights, interests, traditional practices, harvesting, navigation, and access to traditionally used resources.

Relationship Between Trigon and Marine Shipping Operators

Trigon recognizes the importance of clearly identifying the roles and responsibilities of Trigon, vessel owners and operators, terminal operators, and other parties involved in marine transportation associated with the Project.

[18] https://www.ppa.gc.ca/standard/pilotage/2026-06/Notice%20to%20Industry_02-2025_Escort%20Tug%20Regime%20for%20Northern%20British%20Columbia%20%28Updated%29.pdf

Trigon will not operate the vessels transporting LPG from the Project. Marine transportation will be undertaken by appropriately qualified and authorized third-party vessel owners/operators and will be subject to applicable federal and international marine safety, navigation, environmental protection, and dangerous goods requirements.

Trigon's ability to direct or influence marine shipping activities will be established through operational arrangements with vessel owners/operators and through the conditions governing access to and use of the marine terminal. Within this role, Trigon will have the ability to establish and enforce requirements applicable to vessels calling at the terminal, consistent with its authority as terminal operator and with requirements established by applicable regulators and the Port of Prince Rupert.

Trigon does not, however, have unilateral control over broader marine transportation activities outside the terminal, including the routing, navigation, speed, or operation of vessels once they are operating within waters under the jurisdiction of relevant marine authorities (e.g. PRPA, TC, Canadian Coast Guard, Pacific Pilotage Authority). Such activities are governed by applicable legislation and regulations and are subject to the direction and requirements of the appropriate authorities, pilots, vessel masters, and marine operators.

Trigon distinguishes between activities over which it has direct control, activities over which it can exercise influence through contractual or terminal requirements, and activities that are outside its control but subject to regulatory oversight. Trigon is committed to developing and operating the Project in a manner that minimizes its contribution to cumulative effects associated with marine transportation.

Key Issue 19

Concerns about potential adverse effects to Indigenous rights and interests, community wellbeing, environmental and human health, and access to traditionally used lands and resources due to the cumulative and long-term impacts of existing and reasonably foreseeable industrial development between Terrace and Prince Rupert, including associated increases in rail transportation. Provide additional information about the number and frequency of rail car transportation along the Skeena River between Terrace and Prince Rupert, taking into consideration rail cars both entering and exiting the Port of Prince Rupert. Provide additional information on the relationship between the proponent and the operator responsible for rail transportation, including any ability of the proponent to direct or influence the activity.

Trigon Response

Trigon recognizes the request for additional information regarding the number and frequency of rail cars travelling between Terrace and Prince Rupert, including rail cars entering and exiting the Port of Prince Rupert, and regarding the relationship between Trigon and the railway operator.

The Project is expected to receive up to one loaded unit train per day, containing up to 120 cars; up to 43,800 loaded railcars annually; corresponding empty-car returns; and up to 87,600 directional railcar movements in total.

These figures represent the anticipated rail traffic supplying the facility and should not be interpreted as the total number of rail cars travelling between Terrace and Prince Rupert. The Skeena Subdivision carries rail traffic associated with multiple customers and commodities.

The Project's rail traffic will therefore represent an incremental addition to existing rail traffic, rather than the creation of a new rail transportation route.

Relationship between Trigon and the Rail Operator

CN is the railway operator responsible for the movement of trains on the Skeena Subdivision between Terrace and Prince Rupert. Trigon is not the operator of the mainline railway and does not control CN's rail network or train operations. CN retains operational responsibility for the railway, including train dispatching, routing, train movements, crews and operation of trains on the mainline.

Trigon's relationship with CN is that of terminal operator. Trigon has no direct contracts with CN with respect to the movement of rail cars to or from the facility. Trigon will coordinate with CN regarding the delivery of LPG rail cars to the terminal, including the timing and sequencing of deliveries required to support terminal operations on behalf of others. At the Trigon facility, Trigon will operate the rail unloading facilities and manage the unloading process using equipment leased and operated by Trigon.

Trigon does not own the LPG that will be transported by CN and exported from the facility and as such does not have control over these volumes. However, Trigon does retain the ability to influence the volume and timing of rail cars it requests to be delivered to its terminal, through its commercial and operational coordination with CN. Trigon does not have the authority to direct or control CN's operation of the railway between Terrace and Prince Rupert. Trigon cannot independently determine CN's train routing, dispatching, train meets or passes, crew assignments, operating speeds, or the movement of other trains on the Skeena Subdivision.

In summary, Trigon can influence its own terminal scheduling, but CN retains control over the operation of the regional rail network. The Project's contribution to rail traffic should therefore be understood as an incremental increase in rail-car movements within an existing CN-operated transportation corridor.

CLIMATE CHANGE AND GREENHOUSE GAS (GHG) EMISSIONS

Key Issue 20

Concerns about the project's GHG emissions from ground flare, on-site power generation if BC Hydro is unable to provide sufficient power to support project's operations, and the cumulative effects of facility operations and associated marine shipping emissions in the Prince Rupert region. Provide additional information on GHG reduction measures to support the federal climate change commitment of net-zero by 2050 and any interim measures to be implemented in the event that BC Hydro is unable to provide sufficient power to support the project.

Trigon Response

Trigon estimates that up to 16 MW will be required for on-site power of the terminal. The preferred power source will come from BC Hydro. Should insufficient power be available to operate the facility, the terminal may use alternatives sources to drive compressors.

To maximize site safety, critical process equipment and emergency systems will be backed up by an emergency backup generator. The backup generator will only start up in emergency scenarios where the back-up power from the grid connection was insufficient. If gas driven compressors were to be used, it will be supplied by pipeline quality natural gas. If there is insufficient BC Hydroelectricity available, Trigon is open to exploring using renewable natural gas delivered through existing PNG supply agreements[20] in order to support the federal climate change commitment of net-zero by 2050.

Note that Trigon has enough BC grid power secured in agreements with BC Hydro to run the facility. Trigon is in a position to allocate that electricity to the facility once final regulatory and permitting approvals are in hand. Subject to confirmation of the final energy design and comparable facilities, this could position Trigon as an all-electric LPG export facility in Canada and would strongly support the federal climate change commitment of net-zero by 2050.

As noted previously, Trigon is ISO 14001: 2015 Certified and Green Marine Certified.

[20] https://png.ca/smartenergysolutions-2/rng/

WATER QUALITY AND QUANTITY

Key Issue 21

Concerns about adverse effects on water quality and water quantity from construction and operation activities that could affect fish and fish habitat, terrestrial species at risk, migratory birds, and water used by Indigenous peoples. Provide information on how the project may affect water quality and quantity during each phase, including any mitigation strategies or management plans.

Trigon Response

The Project is located within an existing industrial area in Prince Rupert and will utilize existing industrial infrastructure, including an existing marine jetty. The Project design minimizes new disturbance to terrestrial and aquatic environments by locating infrastructure within a previously developed footprint and avoiding the need for new marine structures, dredging, or major changes to existing watercourses. No in-water or over-water works are anticipated.

The following considers the potential effects on water quality and quantity for all Project phases, including construction, operation, and decommissioning.

Construction Phase Effects

Construction activities have the potential to affect water quality through temporary increases in sediment, accidental releases of fuels or hazardous materials, and changes to drainage patterns within the Project footprint.

Potential construction-related effects include:

- increased surface runoff and erosion from exposed soils and disturbed areas;
- increased sediment loading to nearby aquatic environments;
- accidental spills or releases of fuels, lubricants, concrete products, or other hazardous materials;
- localized changes to stormwater flow patterns;
- temporary increases in turbidity during ground disturbance activities; and
- potential disturbance of contaminated soils or materials associated with historical industrial use if present.

Because the Project is located within a previously developed industrial area, the extent of new ground disturbance is expected to be limited. The Project will be built within the existing coal facility which is surrounded by collection ditches that channel water to a central settling pond where it is tested to ensure compliance with Trigon's provincial water discharge permit (MOE Permit 6698) before being discharged to the environment. No major changes to natural drainage systems or new permanent water withdrawals are anticipated.

Potential effects on fish and fish habitat are not expected. Impacts to migratory birds and terrestrial species at risk are not expected.

Operations Phase Effects

During operations, potential effects on water quality may result from routine facility activities, stormwater management, marine loading operations, and accidental releases.

Potential operational pathways include:

- stormwater runoff from operational areas;
- accidental releases of hydrocarbons, chemicals, or process fluids;
- marine vessel loading activities;
- increased vessel traffic within existing shipping routes; and
- atmospheric deposition of combustion-related emissions.

The Project will be designed to prevent uncontrolled releases and manage contact between industrial activities and surface water by ensuring that all rotating equipment is contained in a building or has secondary containment. In addition, the Project will be built within the existing coal facility which is surrounded by collection ditches that channel water to a central settling pond where it is tested to ensure compliance with Trigon's provincial water discharge permit (MOE Permit 6698, which will be amended to support the Project) before being discharged to the environment. No major changes to natural drainage systems or new permanent water withdrawals are anticipated.

Potential effects on marine water quality associated with shipping include the low-probability risk of accidental spills from vessel operations or loading activities. The Project will use an existing jetty, reducing potential effects associated with new in-water construction or seabed disturbance.

No significant changes to regional water quantity are anticipated during operations. The Project will be designed to minimize freshwater demand through efficient water management practices, and any required water use will comply with existing agreements with the PRPA.

Potential Effects on Fish and Fish Habitat

Fish and fish habitat in the Prince Rupert region support ecological functions and Indigenous harvesting activities. Potential effects may occur through changes in water quality.

Potential pathways include:

- sedimentation or contaminant releases affecting aquatic habitat;
- accidental spills affecting marine organisms; and
- changes to prey availability resulting from altered environmental conditions.

The Project is not expected to result in direct loss of marine habitat because no new marine infrastructure or dredging is proposed. In addition, the Project will be built within the existing coal facility which is surrounded by collection ditches that channel water to a central settling pond where it is tested to ensure compliance with Trigon's provincial water discharge permit (MOE Permit 6698) before being discharged to the environment. Potential effects are expected to be primarily related to the incremental increase in operational activities within an existing industrial setting.

Potential Effects on Terrestrial Species at Risk and Migratory Birds

Water quality changes may indirectly affect terrestrial species at risk and migratory birds by influencing habitat conditions and prey availability.

Potential effects include:

- reduced habitat quality if contaminants enter adjacent terrestrial environments;
- disturbance of wildlife using shoreline habitats;
- reduced availability of aquatic prey species used by birds and other wildlife; and
- temporary avoidance of areas affected by construction activity, noise, or lighting.

Mitigation measures to protect terrestrial species and migratory birds include avoiding vegetation disturbance (the facility is being built on an entirely brownfield site), containing and managing water quality using the existing drainage system and settling pond, implementing erosion and sediment controls, preventing contaminant releases, managing lighting, and conducting wildlife monitoring where appropriate.

Potential Effects on Water Used by Indigenous Peoples

Indigenous communities in the region have longstanding relationships with marine and freshwater resources, including use of water areas for harvesting, travel, cultural practices, and stewardship activities.

Potential effects on water used by Indigenous peoples include:

- concerns regarding changes in water quality and the safety of harvested foods;
- reduced confidence in traditional resources due to perceived contamination risks;
- temporary disruption of access during construction activities or marine operations;
- potential effects on fish, shellfish, marine plants, and other resources relied upon for harvesting; and
- changes to culturally important relationships with aquatic environments.

Mitigation Measures and Management Plans

Trigon will update and implement a range of existing measures to prevent, minimize, and monitor potential effects on water resources, including:

- A Water Quality Management Plan;
- Spill Prevention and Emergency Response Plan
- Fish and Fish Habitat Protection Plan;
- An Indigenous Engagement Plan.

The above will be contained as sections in the Construction Environmental Management Plan and Operation Environmental Management Plan.

<u>Water Quality Management Plan</u>

The Project will implement a Water Quality Management Plan that will include:

- erosion and sediment control measures;
- stormwater management procedures;
- monitoring of runoff and discharge points;
- spill prevention and response procedures;
- management of hazardous materials;
- inspection and maintenance requirements; and
- corrective action procedures if monitoring identifies unexpected changes.

<u>Spill Prevention and Emergency Response</u>

Measures will include:

- secondary containment for fuels and hazardous materials;
- controlled storage and handling procedures;
- LPG loading early detection and preventative procedures;
- LPG loading emergency release systems;
- spill response equipment maintained on site;
- employee training;
- emergency reporting procedures; and
- coordination with external emergency response organizations.

Marine spill prevention measures will include compliance with applicable federal marine safety requirements and terminal operating procedures.

Fish and Fish Habitat Protection Plan

Measures will include:

- avoiding new in-water construction;
- maintaining stormwater controls;
- preventing release of deleterious substances;
- implementing marine environmental protection procedures;
- complying with applicable *Fisheries Act* requirements; and
- conducting monitoring where required.

Indigenous Engagement Plan

Trigon will continue engagement with Indigenous Nations to:

- identify water resources and harvesting areas of importance;
- incorporate Indigenous Knowledge, where shared;
- identify appropriate monitoring locations and indicators;
- discuss potential concerns related to water quality and resource use; and
- develop adaptive management measures if unexpected effects occur.

Preliminary Consideration of Residual Effects

Following implementation of mitigation measures, potential effects on water quality and quantity are expected to be localized, low magnitude, and manageable.

Because the Project is a brownfield development that will use an existing industrial footprint and marine jetty, potential effects associated with habitat disturbance, sedimentation, and changes to natural drainage are expected to be substantially reduced compared with a greenfield development.

With the implementation of standard mitigations and commitments, effects on the following components are expected to be negligible to not significant.

- fish and fish habitat;
- terrestrial species at risk;
- migratory birds;
- regional water quantity; or
- water resources used by Indigenous peoples.

Trigon will continue to assess potential water-related effects through detailed engineering studies, environmental monitoring, regulatory review, and engagement with Indigenous Nations to ensure that mitigation measures remain effective throughout construction and operation.

RESPONSE TO APPENDIX – OTHER COMMENTS, ADVICE, AND RECOMMENDATIONS:

The following provides responses to the IAAC Summary of Issues "Appendix – Other Comments, Advice, and Recommendations", that provides an opportunity to provide additional responses to information request that do not form part of the Key Issues identified by IAAC for the Project. Responses provided herein are for informational purposes only.

INDIGENOUS AND PUBLIC CONSULTATION AND ENGAGEMENT

Comment 1

Concerns regarding the adequacy of engagement activities with Indigenous groups to meaningfully consider and incorporate their concerns into planning and decision-making.

Trigon Response

Trigon recognizes the importance of meaningful and ongoing engagement with Indigenous groups. Trigon has been engaging with Indigenous Nations whose traditional territories overlap with the project footprint on the Project on a continuous bi-weekly or monthly basis since January 2024 and remains committed to continuing this engagement throughout the federal impact assessment process and subsequent Project development. Trigon is aware of the Crown's duty to consult with respect to incremental changes to shipping across the Northwest Coast.

As part of this engagement, Trigon has provided these Indigenous Nations with opportunities to review and comment on Project information at multiple stages of Project development. This has included sharing:

- A draft Project Description for the original Project in January 2024;
- A draft Terms of Reference for an Environmental Assessment in 2024;
- A draft Effects Assessment in 2024; and
- the draft Initial Project Description (IPD) for the IAAC process in May 2026.

Trigon has also shared and discussed relevant environmental studies and technical information to support understanding of the Project and its potential effects.

These engagements have provided opportunities for Indigenous Nations to learn about the Project, raise questions and concerns, and identify matters of importance to their communities. Feedback received through engagement has been considered in the ongoing development of the Project and will continue to inform Project planning, design, mitigation, monitoring, and other decision-making, as appropriate.

Trigon recognizes that meaningful engagement is an ongoing process and that concerns and priorities may evolve as the Project develops. Accordingly, Trigon will continue to engage with the aforementioned Indigenous Nations throughout development of the Project, including through technical discussions and opportunities to review and comment on relevant Project information.

Trigon will also support the Crown's consultation obligations by participating in engagement activities led by the Impact Assessment Agency of Canada and other federal authorities, as appropriate. Trigon is committed to maintaining open and respectful dialogue with Indigenous Nations and to considering Indigenous knowledge and perspectives, where provided, in the continued planning and assessment of the Project.

Comment 2

Concerns about short notices and compressed timelines of the Planning phase and requests to suspend the timelines to address and respond to key issues raised.

Trigon Response

Trigon acknowledges the concerns raised regarding the timing and duration of the Planning Phase and recognizes the importance of providing Indigenous Nations, stakeholders, and the public with meaningful opportunities to review Project information, identify key issues, and provide informed input.

Trigon has engaged with Indigenous Nations whose traditional territories overlap with the project footprint on the Project since January 2024. Documents shared for review and feedback include:

- Draft Project Description (issued January14, 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 Initial Project Description (May 2026)

In addition, update 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.

The timing, administration, and potential modification of timelines associated with the IAAC Impact Assessment process are established under the *Impact Assessment Act* and are administered by the Impact Assessment Agency of Canada (IAAC). Trigon is following the timelines as established by IAAC subject to the *Impact Assessment Act*.

Trigon will continue to participate in the IAAC process in accordance with the applicable requirements and timelines established by IAAC. Trigon will also continue to support meaningful engagement by providing information in a timely manner, responding to information requests, and working collaboratively with Indigenous Nations, regulatory authorities, and stakeholders to address issues raised during the Project.

Where additional information or clarification is identified as necessary, Trigon will work with IAAC and potentially affected Indigenous Nations to support the development of appropriate

approaches for addressing those information needs. Trigon recognizes that effective engagement and a robust impact assessment process require consideration of the capacity, interests, and priorities of participants.

Comment 3

Request for higher resolution project footprint map or scalable GIS product to facilitate meaningful review of the project.

Trigon Response

A higher resolution Project footprint map is available. It will be shared directly with Nations being consulted on the Project and will also be shared with IAAC and uploaded to the IAAC registry.

OPERATIONAL AND LAND USE CONCERNS

Comment 4

Concerns about the lack of information on decommissioning the existing coal operations.

Trigon Response

Trigon recognizes the concern regarding the potential decommissioning of existing coal operations in connection with development of the Project. For clarification, the Project is being designed as an additional facility within the existing industrial footprint and does not currently contemplate the decommissioning of existing operational coal infrastructure as a component of Project development.

The Project will be designed to avoid, to the extent practicable, interference with existing coal terminal infrastructure and operations. Existing coal infrastructure that is required for ongoing coal operations will remain in place and will continue to operate in accordance with applicable regulatory, lease, and operational requirements. The Project is not intended to replace the existing coal terminal or require the retirement of existing coal-handling infrastructure. It will require the removal of the coal from one of the four coal storage yards. That yard will then be regraded and covered in new, clean fill on which the Project will be built.

Development of the Project will, however, require modifications to, or interfaces with, certain existing infrastructure and services. For example, the Project will connect to existing electrical infrastructure, including the electrical substation that currently serves the coal terminal. Other existing utilities, access routes, drainage infrastructure, communications systems, or other services will similarly be modified or shared where appropriate. Such modifications will be undertaken as part of the Project's detailed design and will be subject to applicable engineering, safety, operational, and regulatory requirements. These modifications will not constitute decommissioning of the existing coal operations.

Where Project construction requires the modification, or temporary interruption of existing coal infrastructure or services, Trigon will develop appropriate measures to maintain the safe and reliable operation of the coal terminal. Any changes will be planned in coordination with existing terminal operations and will be implemented in a manner that minimizes disruption and maintains applicable safety and environmental requirements.

Trigon also recognizes that the Project and existing coal operations will have an ongoing interface over the Project lifecycle. Trigon will therefore consider the potential interactions between the two operations during construction and operation, including shared infrastructure, utilities, access, emergency response, maintenance, and operational controls. Appropriate procedures will be established to manage these interfaces and maintain safe operations.

The development of the LPG Project does not result in the closure or decommissioning of the existing coal terminal. Consequently, a decommissioning plan for the existing coal operations is not proposed as part of the Project's decommissioning scope. If circumstances change in the future and Trigon proposes to permanently cease or decommission existing coal operations, those activities will be subject to the applicable regulatory, lease, environmental, and closure requirements in effect at that time.

The Project itself has a defined lifecycle and will be subject to appropriate decommissioning and closure planning. As part of the Project's lifecycle planning, Trigon will identify the

requirements for decommissioning the LPG infrastructure, managing residual materials, addressing environmental conditions, and restoring or otherwise managing the Project footprint at the end of its operational life, in accordance with the applicable requirements of the time.

Trigon distinguishes between modification or integration of existing infrastructure to accommodate the Project and decommissioning of existing coal operations. While the former may be required in certain circumstances, the latter is not currently contemplated as part of the Project. Trigon will provide further details regarding specific interfaces with existing coal infrastructure as the Project design progresses.

Comment 5

Concerns about the effects of site preparation or the risks of not remediating the lands used to develop the project.

Trigon Response

Trigon recognizes the concerns regarding the potential effects of site preparation activities and the risks associated with remediation of lands used for the Project. The proposed LPG Project area is located within the existing Ridley Island industrial area and has been used for industrial purposes, including coal handling and storage activities, since 1982.

Trigon currently holds an active head lease covering the proposed LPG Project area. The current term of the head lease extends to March 31, 2039, with an option to extend the lease for an additional 20 years to March 31, 2059. Trigon's existing coal terminal operations are conducted in accordance with applicable regulatory requirements and the terms and conditions governing use of the terminal lands.

The Project will be developed within an existing industrial footprint that has a long history of regulated industrial use. Trigon will manage existing materials and site conditions as part of Project development and will meet applicable lease, regulatory, and environmental requirements. The removal of existing coal storage areas and placement of suitable clean fill and engineered cover materials is likely to improve the environmental management of portions of the existing site relative to current conditions. Further details regarding site characterization, material management, and any remediation or reclamation requirements will be confirmed as Project engineering and permitting progress.

Comment 6

Concerns that there is no limit proposed on the length of the project's operations phase.

Trigon Response

Trigon recognizes the concern regarding the duration of the Project's operations phase. For the purposes of Project planning and assessment, and as described in the IPD, the Project assumes an initial 50-year operational lifespan, reflecting the anticipated useful life of the Project infrastructure and the long-term nature of the proposed facility.

The 50-year lifespan is not intended to represent a fixed termination date for Project operations. Subject to the condition of the infrastructure, applicable regulatory requirements, market conditions, and other relevant factors, the operational life of the Project may be extended beyond 50 years. Any extension will be subject to the regulatory and authorization requirements applicable at that time, including any requirements for maintenance, upgrades, environmental management, or additional assessment.

Throughout the Project's operational life, including any period beyond the initial 50-year lifespan, the Project will remain subject to applicable federal, provincial, and local legislation, regulations, permits, authorizations, and other regulatory requirements. Trigon will continue to maintain and operate the Project in accordance with these requirements and will implement applicable environmental protection, monitoring, mitigation, and emergency preparedness measures.

Trigon will periodically evaluate the condition, performance, and remaining useful life of Project infrastructure and undertake maintenance, replacement, upgrades, or other measures as necessary to support safe and environmentally responsible operations. Should the Project ultimately cease operations, Trigon will comply with applicable requirements for closure, decommissioning, remediation, and reclamation.

Comment 7

Comments about the need for the project to meet the demand for Canada's LPG.

Trigon Response

Canada is well positioned to increase LPG exports over the coming decades, supported by growing natural gas and natural gas liquids production in Western Canada and increasing demand for reliable LPG supply in international markets, particularly in Asia. Canadian LPG production is currently approximately 500,000 barrels per day, with roughly half consumed domestically and the balance available for export. Canadian LPG exports have grown significantly in recent years, and continued growth in Western Canadian production is expected to provide additional supply available for export with a lack of available export capacity.

Over the longer term, continued development of Western Canadian natural gas resources, including the Montney, is expected to support additional supply. The Canada Energy Regulator's outlook indicates that production is closely linked to natural gas production, and that is expected to increase over the coming decades under a range of scenarios.

The growth in Canadian LPG supply creates a corresponding need for reliable, competitive export infrastructure. Existing and proposed west coast facilities provide access to Asian markets, where Canada's geographic proximity provides a significant transportation advantage relative to competing supply from the U.S. Gulf Coast. Existing operators have specifically identified the long-term growth opportunity for LPG exports based on Canada's low-cost supply and the structural shipping advantage to Asia[21].

[21] https://www.altagas.ca/sites/default/files/2026-08/ALA%20-%20Q2%202026%20Results%20Call_Transcript.pdf

The market opportunity is particularly significant in Asia, where Canadian LPG benefits from a geographic and transportation advantage relative to supply from the U.S. Gulf Coast and other exporting regions. It has been noted that demand for Canadian LPG in Asian markets is increasing and that Canada is well positioned to provide a reliable and diversified source of supply.

The scale of the opportunity is demonstrated by continued expansion of LPG export capacity. The Ridley Island Energy Export Facility (REEF) is currently being developed in phases, with additional expansions planned and publicly stated of up to approximately 500,000 barrels per day of LPG export capacity.

This expansion demonstrates both the growth in anticipated Canadian LPG export volumes and the need for additional competitive export infrastructure. A competitive export market with multiple facilities and routes provides Canadian producers and customers with greater flexibility, reduces reliance on a limited number of export facilities, and supports access to higher-value international markets.

The Trigon Pacific LPG Project will contribute to this growing export infrastructure by providing additional capacity on Canada's West Coast and an additional competitive option for Canadian LPG producers and international customers. Over the Project's operating life, the Project will provide infrastructure capable of supporting the continued growth and diversification of Canadian LPG exports and provide producers and customers with greater choice and flexibility in accessing global markets.

Comment 8

Concern about the lack of land use rights under Trigon's lease to construct and operate the project and export LPG.

Trigon Response

Trigon currently holds an existing lease with the Prince Rupert Port Authority (PRPA) relating to the Project lands. There is an ongoing civil proceeding concerning the interpretation and application of the lease and Trigon's rights under it. Trigon is actively pursuing resolution of this matter through the appropriate legal process.

PRPA also asserts that it has provided time-limited rights[22] to another company for the export of bulk liquids including LPG.

Trigon considers the lease matter to be separate from the assessment of the potential environmental, social, health, economic, and Indigenous effects of the Project. Trigon will continue to provide IAAC with information relevant to the Project and will update IAAC as appropriate regarding any material developments that affect the Project's ability to proceed.

Trigon remains committed to complying with all applicable land use, regulatory, permitting, and authorization requirements necessary to construct and operate the Project. Any required land

[22] https://www.rupertport.com/wp-content/uploads/2023/11/2023.11.13-PRPA-AFFIRMS-COMMERCIAL-COMMITMENTS.pdf

use rights or authorizations will be confirmed and secured prior to undertaking the applicable Project activities.

Comment 9

Concerns about the proponent's attempt to initiate two separate regulatory processes for projects on the same parcel of land, including the current impact assessment process for the project and an attempt to initiate a review under section 81-91 of the *Impact Assessment Act* for a previous version of the project.

Trigon Response

Trigon respectfully clarifies that there are not two active impact assessment or regulatory processes underway. The current federal impact assessment process relates to the Project currently proposed by Trigon and is distinct from the previous LPG proposal submitted to the Prince Rupert Port Authority (PRPA) in 2024, which is not currently the subject of an active review by PRPA in any event.

In 2024, Trigon submitted a proposal to the PRPA for an LPG export facility focused on propane, including approximately 98,000 m³ of propane storage. The PRPA did not accept the project into a S.82 review process. Trigon subsequently initiated judicial review proceedings in relation to the PRPA's decision. That proceeding concerns the PRPA's decision not to review the 2024 proposal.

While both proposals contemplated use of the same general industrial site, the current Project differs materially from the 2024 proposal. The current IAAC process is not a second concurrent impact assessment of the 2024 proposal.

Trigon therefore considers the 2024 proposal and the current Project to be separate project proposals. Trigon will continue to provide IAAC with accurate and current information regarding the Project and will comply with the applicable requirements of the federal impact assessment process.

PORT DEVELOPMENT

Comment 10

Concerns about regulatory processes managed by the Prince Rupert Port Authority (PRPA) in assessing the impacts of the project, including in relation to transparency and consultation with Indigenous groups.

Trigon Response

Trigon recognizes the importance of transparent regulatory processes and meaningful engagement with Indigenous Nations throughout Project planning, assessment, and regulatory review. While PRPA is best positioned to describe its own regulatory processes and consultation practices, Trigon understands that PRPA has independent responsibilities related to the review of projects occurring on port lands.

Trigon will continue to engage directly with potentially affected Indigenous Nations, provide information to support regulatory review processes, and consider feedback received through engagement as the Project advances. Trigon remains committed to transparency and meaningful participation throughout the impact assessment process and any subsequent permitting processes.

Comment 11

Request for clarity around PRPA's involvement in the impact assessment process given its role as a federal regulatory authority, the land manager of the Port of Prince Rupert, and a party to an ongoing legal dispute over the lease agreement with the proponent.

Trigon Response

Trigon defers to PRPA and IAAC to clarify the PRPA's role as a federal authority, land manager, and participant in the impact assessment process.

Trigon understands that PRPA may provide advice to IAAC within its mandate and areas of expertise to support the federal impact assessment process. Trigon will continue to participate in the federal impact assessment process in good faith and provide relevant Project information to IAAC and other federal authorities, as required.

As contemplated under the *Impact Assessment Act*, any regulatory authorizations required from federal authorities, including PRPA, will be sought and obtained following the completion of the federal impact assessment process.

As indicated in Trigon's Response to Comment 8, the ongoing civil proceedings concerning Trigon's lease agreement with PRPA are separate from the assessment of the potential environmental, social, health, economic, and Indigenous effects of the Project.

REGIONAL INITIATIVES

Comment 12

Concerns about regional initiatives or discussion forums related to rail transportation and marine shipping being referred to as mitigation measures for effects from the project.

Trigon Response

Trigon acknowledges the importance of regional coordination and information-sharing initiatives related to rail transportation and marine shipping in the Prince Rupert region. However, Trigon recognizes that these initiatives are not considered mitigation measures for Project-specific effects**.** Rather, regional transportation planning, marine traffic management, and cumulative effects management are broader matters that extend beyond the scope, control, and responsibility of any single project proponent.

The Project will implement mitigation measures that are within its direct control and responsibility, including measures related to facility design, construction practices, operational procedures, emergency preparedness, and management of Project-related transportation activities. These measures are intended to avoid, minimize, or manage effects that are reasonably attributable to the Project.

Cumulative effects associated with regional increases in marine shipping and rail transportation result from the combined activities of multiple proponents, existing industries, transportation providers, government agencies, and broader economic activities. As such, no individual proponent has the ability or mandate to manage regional-scale transportation patterns or cumulative effects beyond its own contribution. Effective management of these broader effects requires coordinated planning, oversight, and decision-making by the appropriate federal, provincial, and regional authorities.

Trigon considers regional initiatives and discussion forums to be important mechanisms for information exchange, collaboration, and improved coordination among governments, Indigenous Nations, industry, communities, and stakeholders. Participation in these forums can support transparency, shared understanding of regional conditions, and alignment of information related to cumulative effects. However, participation in such initiatives should not be interpreted as a substitute for regulatory oversight or as a mitigation measure for effects attributable to the Project.

With respect to marine shipping, Trigon’s responsibility is limited to the safe operation of marine terminal activities in accordance with applicable regulatory requirements and industry standards. Broader management of third-party vessels calling at Trigon’s facility, regional vessel traffic, navigation routes, marine protected areas, cumulative shipping noise, and ecosystem-scale effects requires coordination among federal authorities, including agencies responsible for marine safety, navigation, fisheries, and environmental protection.

Similarly, rail transportation associated with the Project will be handled by a third-party operator (CN)within an established rail network regulated through federal and provincial transportation authorities. Trigon will implement measures related to its own rail operations, including compliance with applicable dangerous goods requirements, transportation safety regulations, and emergency response procedures. Broader issues related to regional rail capacity, network

congestion, and cumulative transportation effects require consideration through appropriate government-led planning processes, which Trigon will be pleased to participate in.

Trigon will continue to engage constructively with Indigenous Nations, government agencies, and regional stakeholders regarding cumulative effects and regional transportation considerations. Trigon supports coordinated approaches that improve regional understanding and management of cumulative effects while maintaining a clear distinction between Project-specific mitigation measures, which are the responsibility of Trigon, and regional cumulative effects management, which requires broader government-led oversight and collaboration.

ASSESSMENT SCOPE

Comment 13

Concerns that the proposed local and regional study areas are too narrow in scope to appropriately assess effects on marine transportation, cumulative effects, fisheries, migratory species, Indigenous rights, wildlife, marine harvesting, and stewardship responsibilities.

Trigon Response

Trigon acknowledges the importance of establishing appropriate study areas that are sufficiently broad to assess potential Project effects, including effects that may extend beyond the immediate Project footprint. However, the Project is currently in the planning phase of the IAAC Impact Assessment process, and the proposed local and regional study areas are preliminary and have not yet been finalized.

If the Project advances to an impact assessment, Trigon will continue to work with Indigenous Nations, government authorities, and other interested parties confirm that study areas are appropriate for evaluating potential effects.

Comment 14

Concerns about the representativeness of selected monitoring locations to support sufficient baseline data collection, environmental assessment, and predictive modelling.

Trigon Response

Trigon acknowledges the importance of selecting appropriate and representative monitoring locations to support baseline data collection, effects assessment, and predictive modelling. However, specific environmental monitoring locations have not yet been finalized, as the Project is currently in the planning phase of the Impact Assessment Agency of Canada (IAAC) process. Monitoring locations will be determined through subsequent stages of Project planning, informed by regulatory requirements, technical studies, Indigenous Knowledge, engagement with Indigenous Nations, and potential pathways of effect.

The selection of monitoring locations will be guided by the need to characterize existing environmental conditions, identify areas potentially influenced by the Project, and establish appropriate reference or regional context locations. The monitoring program will consider factors including Project design, potential pathways of effects, existing industrial influences, environmental gradients, habitat characteristics, accessibility, and the spatial distribution of sensitive receptors.

Monitoring locations will be selected to provide sufficient information to characterize existing conditions and track effectiveness of proposed mitigation measures.

Trigon will continue to engage with Indigenous Nations and regulatory authorities during the development of the baseline monitoring program to identify areas of importance, incorporate Indigenous Knowledge where shared, and ensure that monitoring approaches reflect local and regional environmental conditions. Input received through engagement will inform the refinement of sampling locations, methodologies, and monitoring frequency.

Where appropriate, monitoring locations will include areas within the Project footprint, areas accessible to the public, areas with potential exposure to Project-related effects, and reference areas that provide context for understanding natural variability and existing cumulative effects.

Trigon recognizes that representative baseline information is essential for evaluating potential effects and developing appropriate mitigation measures. Accordingly, the baseline data collection program will be developed using a scientifically defensible approach that meets regulatory expectations while incorporating Indigenous Knowledge and community input.

APPENDIX A:

Trigon Terminals is an operating coal and LPG export facility and operates in a safe, respectful, and environmentally responsible manner within an established and effective ecosystem of Acts, regulations, plans, policies, certifications, and memberships that govern the operation of the facility and activities around it. Trigon's plans and policies will be updated as needed for the Project to ensure compliance with all applicable Acts and regulations as well as commitments made in the IPD, this document, and during Indigenous and public engagement.

PRPA Port Information

All vessels calling at the facility will be subject to conditions set out in PRPA's Port Information Guide. This guide includes information on a wide range of topics related to Port operations including:

- Vessel operations
- Vessel Environmental Requirements
- Loading/Discharging Procedures
- Port Security
- Port Navigation
- Issues to be reported
- Arrival/Departure Checklist
- Notification (e.g. Dangerous goods, customs, waste
- Port Safety
    - Emergency contacts
    - Emergency Response including the PRPA Emergency Management Plan.

Acts, Regulations, and Conditions

Trigon will ensure compliance with the following Acts, Regulations and conditions, at minimum:

- *Marine Transportation Security Act* and Regulations
- International Ship and Facility Security Code
- *Fisheries Act*
- *Canadian Navigable Waters Act*
- Ozone-Depleting Substances and Halocarbon Alternatives Regulations
- *Transportation of Dangerous Goods Act*
- National Fire Code
- Storage Tank Systems for Petroleum Products and Allied Petroleum Products Regulations
- *Migratory Birds Convention Act*
- BC Ministry of Environment Discharge Permit (Permit 6698)
- *BC Environmental Management Act*
- BC Hazardous Waste Regulation
- BC Spill Reporting Regulations
- PRPA Lease - Environmental Conditions
- *BC Water Sustainability Act*

Existing Trigon Plans and Policies

As the Trigon facility is shipping coal and LPG today, Trigon has an extensive system of plans and policies related to the safe, and environmentally sound operation of the terminal. These include but are not limited to:

- Workplace Violence and Harassment Prevention Program
- Employment Equity Self-Identification Program
- Emergency Preparedness and Response
- Emergency Response Procedures
- Air Quality Monitoring Procedure
- Soil Management and Excavation Procedure
- Effluent Treatment System
- Mechanical Waste Procedure
- Warehouse Waste Procedure
- Waste Management Reduction Plan
- General Operating Instruction Manual: LPG (rail yard operation)
- Service Track Derail procedure
- Berth Communications Plan
- Berth Checks Cautions PPR Protocols
- Berth Lockout and Activation
- Vessel Berthing Plan
- Train Handling Procedures
- Ship Handling Procedures
- Continuing Education Plan
- Professional Development Credits
- Code of Conduct (incl Human Rights, Workplace Violence)
- Substance Abuse Policy
- Privacy Policy
- Marine Facility Security Plan
- Occupational Health And Safety Plan, including:
    - Safe work practices and procedures
    - Emergency Response Plan
    - Workplace Violence Policy
    - Harassment Policy
    - Crisis Communication Plan
    - Safety Training and Communication
- Shiploading Plan, including:
    - Tying-up and letting go of a vessel
    - Safe shiploader operation
    - Dock communications
    - High winds shutdown
- Compliance Obligation Register

ISO Certifications

Trigon holds the following ISO Certifications:

- ISO 45001:2018 Certified, which covers:
    - Canadian Labour Code
      WorkSafe BC
    - Procedures and Training
    - Audits
- ISO 9001: 2015 Certified
- ISO 14001: 2015 Certified, which covers:
    - Effluent treatment and control
    - Air pollutant emission inventory
    - GHG Emmission inventory
    - Green Marine Certified

Green Marine Certification

Through environmental stewardship and commitment to continuous improvement, Trigon has steadily improved the environmental performance of the terminal since 2012 has achieved the highest available score in the applicable Green Marine performance indicators since 2022.