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

October 15, 2026

Dear Emily,

Re: Overview of PRPA Project Review Process

As requested, please find attached a summary of the process for reviewing projects proposed at the Port of Prince Rupert.

You will note the process differs for projects which are designated under the *Impact Assessment Act* versus projects reviewed under the federal land provisions. For federal land reviews, PRPA scales the review process commensurate with the complexity of the respective project. Although section 82 of the *Impact Assessment Act* would not apply to the Trigon Pacific LPG Project as it is a designated project, PRPA would carry out a project review as described below as part of its mandate and authorization requirements under the *Port Authority Operations Regulations.*

Please let me know if you would like any additional information or have any questions.

Sincerely,

<Original signed by>

Jack Smith
Director, Environmental Planning and Compliance
info@rupertport.com

Summary of Project Review Process for Projects Proposed at the Port of Prince Rupert

Introduction

The Prince Rupert Port Authority (PRPA) is committed to building a better Canada by growing trade. Through the Canada Marine Act, the Government of Canada has provided PRPA with a mandate to implement policies that provide the required infrastructure to promote and safeguard Canada's competitiveness and trade objectives. Along with the mandate for supporting the growth of trade, PRPA has a regulatory role relating to custodianship of federal lands, navigation, and health and safety. These responsibilities apply to any projects proposed at the Port of Prince Rupert (the Port) and are managed through a technical review and authorization process. The authority for fulfilling this mandate is defined within the *Canada Marine Act* and the *Port Authorities Operations Regulations*.

The technical review and authorization process for projects includes consideration of several factors. The interests of the Public and local communities, Indigenous Groups, and other Port users are considered in project reviews. Environmental sustainability, navigation, and health/safety standards are also integrated into all aspects of a project's planning, construction, and operation.

Land Use Planning

PRPA undertakes ongoing Land Use Planning for the lands and waters under its administration. The Land Use Plan (LUP) provides the overall guiding principles and considerations of how land is developed and used at the Port. This guide is updated on an ongoing basis and is available on the PRPA website.

As a first step in the Project review Process, a project is evaluated against the objectives of the Land Use Plan. A project's location is considered in the context of existing Port Infrastructure, priority development areas, and the land use and policy directions defined in the LUP. The Land Use Plan is available on the PRPA website at (https://www.rupertport.com/land-use-plan/).

Port Information Guide

PRPA publishes a Port Information Guide (PIG) which is available on its website (www.rupertport.com/port-information-guide/). The PIG has been prepared for Masters of seagoing vessels, shipping lines, publishers of nautical information and any other party that requires nautical information regarding the Port of Prince Rupert. The PIG contains PRPA Practices and Procedures pursuant to Section 561 of the Canada Marine Act. These Practices and Procedures apply to all vessels within the port limits of Prince Rupert and to all persons responsible for the planning, operation, conduct and safe navigation of such vessels.

The PIG is also a useful reference for Project Proponents considering development at the Port of Prince Rupert. It contains in-depth information of all aspects of navigation and ship's services for vessels calling on the Port of Prince Rupert.

Consideration of Community

The Port of Prince Rupert is within and adjacent to the city of Prince Rupert, the district of Port Edward, and the communities of Metlakatla, and Dodge Cove. In addition to being integrated in the Land Use Planning initiatives, the interests of communities are also included in the project review process. These interests extend throughout the initial planning phases to construction and operation of any new projects where a potential for community concern exists.

Community interests can include both environmental and socio-economic considerations. Environmental considerations can relate to noise, air emissions and water quality. Socio-economic considerations can include increased vehicular/rail/marine traffic, access to services, and recreational opportunities. Business and employment opportunities are also considerations with larger projects.

PRPA may undertake or require the submission of public and stakeholder engagement plans as part of the project review process. To enable direct feedback from the public, PRPA also administers a complaint and resolution service. Complaints from the public will be responded to as soon as possible and include any steps taken to address or respond to the issue or concern. Community complaints are received by telephone at the main PRPA administration line at 250-627-8899 or by email at info@rupertport.com.

Environmental Sustainability

As a custodian of federal lands and in support of the principles of sustainable development, PRPA administers several sustainability programs that are relevant to project developments. These programs support the understanding of the existing environment and baseline conditions, provide an understanding of cumulative effects management for the overall Port complex, and contribute to fish habitat offset planning.

The Port of Prince Rupert Cumulative Effects Program is an ongoing program to support the management of development within the Port by tracking key environmental or socio-economic indicators. Goals include using existing data to support filling any information gaps, reporting on cumulative effects management progress to key audiences (both internal and external), and to support land use planning and project decision making. This is done to support Indigenous collaboration and consultation and to provide the ability to manage environmental issues holistically as opposed to on a "project-by-project" approach.

PRPA maintains stewardship programs that monitor the ambient environment, including stormwater, and marine water quality. It also operates air quality stations in Prince Rupert and Port Edward with live data reported on the BC Air Quality website. Noise levels are also monitored and reported in real time at stations in both communities.

PRPA also operates a precipitation monitoring program in collaboration with continental environmental initiatives. By testing rain and snow, PRPA gathers key data on airborne pollutants related to atmospheric deposition, allowing the transparent tracking of regional air quality in context with other stations located throughout Canada and the United States.

PRPA also participates in sustainability initiatives with other organizations. Programs include tracking the presence of invasive species such as European Green crab, shoreline imagery data sharing, greenhouse gas reductions, whale tracking, underwater noise, monitoring, energy conservation, industry best practices, and more.

PRPA openly shares data from Port stewardship and sustainability programs in support of project planning processes and assessments.

Safety and Risk Management

The safe operation of a Port is a key component of PRPA's mandate. The *Port Authorities Operations Regulations* specifically prohibit any actions that could jeopardize the safety or health of persons in the Port. All project reviews undertaken at the Port place safety as the priority of any project review process.

Safety and Risk Management components of a project review may require the following:

- Confirmation of a health and safety plan,
- Emergency and Spill Response Planning, and
- Qualitative or Quantitative Risk Assessment

Although the project proponent remains responsible for the safety of personnel within their area of control, PRPA administers Port-wide safety and emergency planning initiatives that may require inclusion within the project review process.

PRPA is also engaged in safety and emergency planning for any activities that have the potential to affect areas outside the specific area of a project's footprint. A project proponent may be requested to assess and mitigate any off-site effects as part of a project review process.

Details and expectations regarding safety planning and risk management will be conveyed during a project's technical evaluation.

Managing safety and risk overlaps with multiple jurisdictions and levels of government. In addition to other federal authorities, PRPA works closely with many partners including Technical Safety BC, BC Energy Regulator, BC Ministry of Environment, the BC Environmental Assessment Office, Emergency Management BC, the City of Prince Rupert. These collaborative relationships can assist in supporting emergency preparedness as well as project planning.

Security

As a federal Port Authority, PRPA has the authority to restrict and control public access to Port property. Access to Port property by project proponents and contractors can be provided through the PRPA.

Project proponents may also be required to develop a security plan for construction and operations of a project. If required, guidance on the development of the security plan will be provided during the project review process. As a federal Port, threat levels are assigned by Transport Canada Marine Security (TCMS).

Indigenous Consultation

As a manager of federal lands and as confirmed in the *Canada Marine Act*, PRPA is an Agent of the Crown for the purposes of Indigenous consultation. The Crown has a constitutional duty to consult and, where appropriate, accommodate Indigenous groups when considering conduct that may adversely affect potential or established rights. While this duty cannot be delegated, PRPA will consider any consultation processes and accommodation measures undertaken by project proponents to help meet its consultation responsibilities.

As a federal authority, PRPA is guided by Federal Policy for conducting Indigenous consultation. The procedures and principles that guide PRPA include the Aboriginal Consultation and Accommodation Guide prepared by the Government of Canada (March 2011) as well as any updated guidance provided by the Government of Canada.

If PRPA determines the project has the potential to adversely impact potential or established Aboriginal or treaty rights, or as a matter of good governance, or through existing agreements, PRPA may request the project proponent engage with certain Indigenous Groups as part of the project planning process. For these projects, a project proponent will be expected to describe the project, determine any concerns from the Indigenous group, and to seek measures to address those concerns. Proponents will also be expected to retain detailed records of Indigenous engagements including detailed consultation logs and issues tracking tables.

Consultation is also undertaken during project planning activities prior to the PRPA approval process, and often continues throughout construction, operations and decommissioning. PRPA's duty to consult is not limited to the s.82 IAA process but is applicable to all PRPA's Crown conduct. As such, PRPA also consults on the development of regulatory conditions through the PAOR process.

Prior to reaching any determination that would enable a project to proceed, an adequacy of consultation assessment is undertaken by PRPA. This internal exercise considers consultation undertaken by PRPA during the review process, as well as any engagement undertaken by the project proponent.

Emergency Works

In certain circumstances, a terminal operator or project proponent may be required to undertake certain actions that might otherwise be considered "a project" requiring an applicable regulatory review. Although Terminal Operators and Project Proponents remain subject to all applicable federal requirements, the immediate interests of public safety and environmental protection may require reliance upon emergency provisions for expediency.

Guiding Principles

PRPA defines the Guiding Principles for project developments within the PRPA Land Use Plan. This Plan is updated on a recurring basis. The three primary goals for PRPA in evaluating project development at the Port of Prince Rupert are as follows:

1) PRPA will continue to enable Canadian trade growth and gateway competitiveness by facilitating new port capacities, capabilities, and efficiencies.

2) PRPA will make efficient use of land by maximizing land use value, intensity and density through careful and progressive planning and land allocation.

3) PRPA will protect the gateway environment by developing responsibly and sustainably and minimizing environmental impacts of operations.

The values that guide PRPA as an organization include:

1) INTEGRITY - We are ethical, transparent, and accountable in creating value for our customers, stakeholders, and organization. We build trust through responsible actions and honest relationships.

2) TEAMWORK - Our individual talents allow us to reach great heights when we join forces with our coworkers, customers, and community to effectively solve some of the most pressing opportunities and challenges facing international trade together, building a better Canada by growing trade.

3) INNOVATION - Finding new solutions to old problems has always been what sets us apart. We are committed to continuous improvement in the pursuit of excellence through creativity and ingenuity and effectively manage the risk that may come with innovation.

4) SUSTAINABILITY - The north coast of Canada is our home. We vigorously pursue a long-term vision that recognizes the importance of balancing environmental stewardship, economic vitality, social responsibility, and safety in our development and operations, contributing to our shared success and prosperity for generations to come.

5) DIVERSITY - We are committed to an inclusive organizational culture that connects us closer to our community, customers, and coworkers. We celebrate diverse perspectives of all stakeholders to make us more effective as an organization and essential to our sustainability today and for the future

Commercial Agreements

PRPA's legislated function includes long-term strategic land management and commercial planning in pursuit of a commercially sustainable port operation. As a result, PRPA's project review process must consider whether existing and/or proposed commercial and land tenure arrangements are sufficient to enable development to proceed. For new projects, instruments such as Feasibility Assessment Agreements and Project Development Agreements may establish the requisite rights and responsibilities to enable further development on Port lands and waters. For existing operators or projects, such rights and responsibilities may be grounded, for example, in an existing lease or terminal operating agreement.

Environmental Assessment

As the federal authority with custodial responsibilities for the Port of Prince Rupert, PRPA is subject to the federal *Impact Assessment Act (IAA)*. The IAA defines responsibilities for both proponents and Federal Authorities - which includes PRPA.

Any project that exceeds the thresholds described in the Physical Activities Regulations established under the IAA requires the proponent to submit an Initial Project Description to the Impact Assessment Agency of Canada (IAAC) for the impact assessment process.

For Projects on federal lands (e.g.: Port lands) that do not exceed these thresholds, PRPA is the responsible federal authority for conducting a federal lands project review. If a permit, authorization, approval, or financial contribution is provided by any other federal authority, that authority would also be responsible to ensure a federal lands assessment is completed. Federal authorities cannot issue any permit, authorization, or provide a financial contribution until the assessment is completed.

For non-designated projects on Port Lands, PRPA and other Federal Authorities are guided by the document "*Projects on federal lands and outside Canada Guidance document on Sections 81 to 91 of the Impact Assessment Act*" (December 2021) prepared by the Impact Assessment Agency of Canada. This guide defines the process and principles for conducting an environmental effects determination for projects on federal lands.

Managing Effects within Federal Jurisdiction

The responsibility for managing effects within federal jurisdiction is shared by various federal authorities. Fisheries and Oceans Canada is responsible for the protection of fish and Fish Habitat. Environment and Climate Change Canada is responsible for a broad range of environmental components as defined within the Canadian Environmental Protection Act and other legislation. Other federal departments maintain various responsibilities for a diverse range of federal responsibilities.

PRPA, along with any other project proponents within PRPA's jurisdiction, are responsible for determining, and complying with, all applicable federal regulatory requirements established to manage effects within federal jurisdiction.

For any projects assessed under Section 82 of the Impact Assessment Act, the environmental effects from projects on federal lands are considered along with other factors further defined within section 84(1) of the Act. Section 81 of the Act defines environmental effects as changes to the environment and the impact of these changes on the Indigenous peoples of Canada and on health, social or economic conditions.

Within the Port Authorities Operations Regulations, unless authorized by the PRPA, prohibitions under PRPA's federal jurisdiction include any activity that may:

- jeopardize the safety or health of persons in the port;
- interfere with navigation;
- obstruct or threaten any part of the port;
- interfere with an authorized activity in the port;
- divert the flow of a river or stream, cause or affect currents, cause silting or the accumulation of material or otherwise reduce the depth of the waters of the port
- cause a nuisance
- cause damage to ships or other property
- adversely affect soil, air or water quality; or
- adversely affect port operations or the property managed, held or occupied by the port authority

The Canada Marine Act and Port Authority Operations Regulations describe a broad range of activities, interests, procedures and authority to manage a broad range of effects within federal jurisdiction within the Port of Prince Rupert.

Project Authorization Process

The Prince Rupert Port Authority evaluates any proposed projects on Port Lands under the Port Authorities Operations Regulations established under the *Canada Marine Act*. Part 8 of Schedule 1 of these regulations list the activities requiring an authorization. Within Schedule 1, item 9 (excavating or removing any material or substance) and item 14 (building, placing, rebuilding, repairing, altering, moving or removing any structure or work on, in, over, under, through or across land or water) capture most projects proposed at the Port of Prince Rupert. If a project involves any of these activities, or any of the others referenced in schedule 1, an authorization from PRPA under the Port Authorities Operations Regulations will be required.

For large and complex projects, multiple Port Authority Operations Regulations authorizations may be required. This can facilitate phased development or enable initial project activities to commence while detailed plans and engineering reach a sufficient level of specificity required for the various technical reviews undertaken by PRPA. For example, a large capital project may require separate authorizations for early works (clearing and grubbing), blasting and leveling, construction of structures and services, and commissioning and operations.

Scope of Project

For projects designated under the Impact Assessment Act, the scope of the project is determined by the Impact Assessment Agency of Canada for the purposes of the Impact Assessment Act designated project review. The scope of the project for technical review and permitting under the Port Authorities Operations Regulations is determined by PRPA. For projects involving multiple federal authorities, the scope of the project is determined through coordination with these other federal authorities.

Scope of Project Reviews

The scope of a project's review is highly dependent on the nature of the proposed project. Some projects trigger requirements under the Impact Assessment Act while some projects may require a simple written confirmation to proceed. For example, a new marine terminal on undeveloped land and in the marine environment would be far more complex than seeking an approval to undertake a diving survey using SCUBA of fish habitat.

Factors that may be considered in the scope of a project review include the following:

- Evaluation of any project component within Federal Port lands or waters
- Land use compatibility,
- Environmental considerations,
- Technical design standards,
- Risk assessment and management of the potential for accidents and malfunctions,
- Safety and security,
- Community interests,
- Indigenous consultation, and
- Any ancillary project components on Port Lands under the care and control of the proponent

Wetland Function Compensation

As custodian of federal lands, PRPA is the responsible federal authority for the implementation of the Federal Policy on Wetland Conservation for projects proposed within the Port of Prince Rupert. The policy includes the requirement for compensation of loss of wetland functions. Wetland functions include socio-economic values as well as biophysical (environmental) values and includes the function of carbon sequestration. Socio-economic functions can include recreational, educational, aesthetic, traditional use, and country-foods harvesting. Bio-physical functions can include environmental processes such as hydrological functions and nutrient cycles and functions related to the support of plants and animals, including species at risk.

If a project involves the destruction or disruption of wetlands, such as through clearing and leveling of lands, wetland function compensation will be required. PRPA will work with proponents to identify opportunities for wetland function compensation if applicable to the project. As Prince Rupert is located within a temperate coastal rainforest, most "greenfield" projects that involve clearing of land for development will be subject to the Federal Policy on Wetland Conservation.

PRPA Review Process

Key pillars for PRPA's project review process include:

- Technical and design - ensuring design standards and integration with the existing Port complex
- Environmental – ensuring completion of any environmental assessment process and development of mitigation measures
- Navigation Protection and Safety – ensuring project construction and operations to do not result in any navigation interference or risks
- Safety and risk management – ensuring appropriate systems are in place for managing any accidents and malfunctions
- Indigenous Relations – contributing to PRPA's role in advancing reconciliation with Indigenous peoples
- Community and Public Affairs – meeting PRPA's objectives of contributing to the local economy and supporting Canada's trade agenda as well as being a good neighbour within the communities we operate

PRPA will define any additional information requirements to support the Project Review Application. Depending on the complexity of the project, the following details and plans may be requested by PRPA to support the review process:

General Information:

- Detailed Project Description
- Maps, charts, drawings and diagrams

Technical Details and Plans:

- Geotechnical studies
- Vegetation Management Plan including Salvageable Timber
- Rock Management Plan (Cut/Fill Balances)
- Surface Water Management Plan (Drainage, erosion control)
- Organics Disposal Options
- Rail operations plan
- Traffic impact assessment and Traffic Management Plan
- Utilities Plan

Environmental Management:

- Archaeological Features Assessments and Protection Plan
- Environmental Effects Evaluation

- Waste Management Plans
- Construction Environmental Management Plan
- Operations Environmental Management Plan
- Summary of Environmental Mitigation Measures

Navigation Planning:

- Marine traffic analysis and Navigation Plans
- Pilot Simulations
- Navigation Obstruction Review and Approvals

Risk Management Planning

- Risk Assessment
- Health and Safety plan
- Spill Response Plan
- Emergency Response and fire safety plan
- Security Plan

Public Engagement:

- Public and Stakeholder Engagement Plan
- Complaint Resolution Plan
- noise abatement
- light abatement
- traffic management
- public communication plan
- stakeholder engagement plan

Indigenous Engagement:

- Indigenous Engagement Plan
- Indigenous Engagement logs
- Issues Tracking and Resolution logs
- Consultation Summary Reports
- Records of Economic Opportunities, Cooperation or Benefits

The above list is not exhaustive, and other information requests may be required. The extent of information requests and details provided is commensurate with the complexity of the project proposed.

When needed or as appropriate, PRPA engages with other federal, provincial, and municipal agencies for expert advice or in areas of shared or overlapping jurisdictional responsibilities.

Authorization

The review process culminates in a determination by PRPA on whether to issue a regulatory approval for the project to proceed. During the authorization process, commercial or contractual arrangements may, if not already finalized, continue to be or begin to be developed and implemented in parallel. Once the review streams have concluded, an authorization may be issued by PRPA under the Port Authorities Operations Regulations (PAOR).

For complex projects, the authorization may be delivered in phases commensurate with the project development process. This can include separate authorizations for early works (clearing, grubbing, drainage), civil works (organics disposal, blasting, leveling), balance of project (construction/erection), and commissioning and operations.

The issuance of an approval under the PAOR may also be considered Crown Conduct which results in a duty to consult with Indigenous peoples. Prior to issuing the approval, PRPA will undertake an evaluation on the adequacy of consultation for meeting Crown/Indigenous reconciliation objectives. As part of the consultation process, a draft of the PAOR Authorization and conditions may be shared with Indigenous groups for their input prior to finalization of the document.

Conditions

To ensure project expectations and objectives are met, enforceable conditions are included in the PAOR Authorization. These may include requirements with respect to submission or plans, details, monitoring and reporting, mitigation measures, or the application of mitigation measures developed within an environmental review process. Draft conditions are generally developed with input from project proponents and shared with a project proponent prior to finalization of the authorization to ensure that a mutual understanding of expectations is captured in the written conditions. Indigenous consultation is undertaken in the development of any conditions for any projects subject to the duty to consult.

Amendments to Authorizations

PRPA recognizes that conditions change for any project, and amendments may be required based on evolving conditions and circumstances. At any time throughout the planning, construction and operations of a project, proponents may request an amendment to the authorization and specific conditions. Such amendments may require a review consistent with the project application review process.

Enforcement

Although development within the Port of Prince Rupert aligns with the mandate of PRPA, it treats any violations of the conditions of an authorization seriously. As a first measure, PRPA will seek to remedy any non-compliance through collaboration with the permittee or project proponent. Should resolution not be obtained, PRPA may proceed with corrective actions available through legislation and regulations or through existing development or land use agreements.

It is important to note that PRPA may cancel an authorization issued under the POAR due to non-compliance with a condition of the authorization pursuant to the authority of the PAOR. Within the authority of these regulations, PRPA may also provide instructions to the project applicant to immediately cease, remove, or restore anything resulting from a previously permitted activity.

In support PRPAs compliance program, and subject to site safety protocols, PRPA conducts compliance audits during the construction, operations, and decommissioning phases of all projects.

Construction

Once all commercial instruments are in place and an approval to proceed has been obtained, construction can commence. All construction activities must comply with any conditions defined within the regulatory approval document issued under the PAOR.

Progress Updates and Reporting

During construction activities, the proponent may be required to host recurring project update meetings with PRPA during this phase of development. Proponents will also be required to prepare reports and keep records of meetings.

Additionally, reporting requirements may include the submission of reports on any aspect of the project activities or the implementation of construction plans. This can include reporting on Public or Indigenous engagement, environmental monitoring data, schedule updates, and upcoming construction activities. Accidents and malfunctions, health and safety incidents, and environmental releases (spills) will require immediate notification the PRPA Port Security and Operations Center (PSOC) and any appropriate program leads.

Upon completion of construction, PRPA will require submission of any *Documents of Record* (e.g.: “As-built” drawings).

Operations

As operations commence, monitoring and reporting shall continue pursuant to monitoring and reporting requirements defined within the PAOR Authorization or the Operations Environmental Management Plan. As with the construction Phase, accidents and malfunctions, health and safety incidents, and environmental releases (spills) will require immediate notification to the PRPA Port Security and Operations Center (PSOC).

In support of risk management, PRPA may also include a condition for the provision of a third-party audit of compliance and risk management systems.

Decommissioning

Decommissioning will be subject to the terms of any land management agreement or requirements defined within the PAOR Authorization. This can include the submission of a decommissioning plan to PRPA. Like the construction phase of project review, the decommissioning planning and approval process will be commensurate with the complexity of the activity.