



**Woodfibre  
LNG**

**Indigenous Communication Plan for Accidents and  
Malfunctions  
Pre-Construction**

**Revision**

Version	Summary of Material Changes
1.0	Initial version for pre-construction

## Skw̓wú7mesh Úxwumixw (Squamish Nation) Preamble

The Woodfibre Liquefied Natural Gas Project is a liquefied natural gas export facility being constructed on the former Woodfibre Pulp and Paper Mill site in Nexwnéwu7ts Átlk'a7tsem (Howe Sound), approximately seven kilometres south of Skw̓wú7mesh (Squamish). The Project is on the historical location of a Skw̓wú7mesh Úxwumixw (Squamish Nation) village known as Swíyát. Swíyát and Nexwnéwu7ts Átlk'a7tsem (Howe Sound) are tied to the cultural well-being of Skw̓wú7meshÚxwumixw (Squamish Nation) members, their ancestors, and their descendants, and to other Indigenous groups as defined in the Project's Environmental Assessment Certificates. Woodfibre LNG Limited recognizes the importance of these areas to the Skw̓wú7mesh stélmexw (Squamish People), and other Indigenous groups. Woodfibre LNG Limited seeks to construct and operate the Project in a manner that is respectful of Indigenous values. This Communications Plan for Accident and Malfunctions is primarily written in English with important place names, species, phrases, and passages provided in the Squamish language.

ilh kwa Skw̓wú7mesh-ulh swa7ewstem tkwi Swíyát. K'isintway tkwa Swíyát, iy Nexwnéwu7ts atll'a7tsem atl'ka7tsen tkwilhtima7 tl'a Skw̓wú7mesh-ulh uxwumixw kwi swa7amswit iy kwi smenhemswit. Na suxwnem tiwa tkwa Woodfibre LNG, iy stl'i7s kwis k'es wa t'ichimswit kwi sk'ekw'iyintsuts.

Temíxwi'íkw chet wa naantem chet ti temíxw Swíyát

Chet wa sméñhemswit kwis ns7éyxñitas chet ti temíxw

We7ú chet kwis t'íchimwit iy íwas chet ek' l tti.

Our ancient ancestors named this place Swíyát

We, as their descendants safeguard these lands

We will continue to swim and fish in these clear waters.

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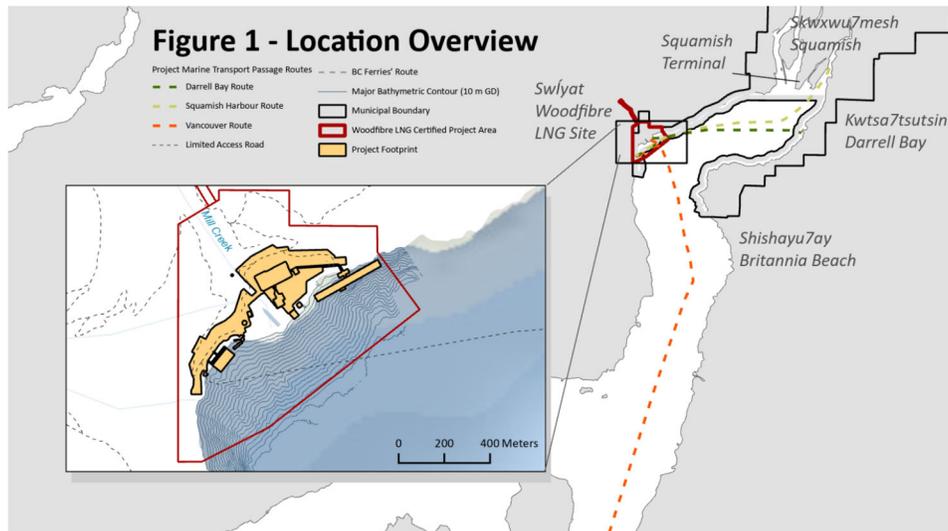
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# 1 Introduction

Woodfibre LNG Ltd. (Woodfibre LNG) will construct and operate the Woodfibre Liquefied Natural Gas (LNG) Project (the Project), which is located on the former Woodfibre Pulp Mill site approximately seven kilometres (km) southwest of Sk̓wx̓wú7mesh (Squamish), British Columbia. The Project will have capacity to liquefy up to 2.1 million tonnes per year of natural gas, have a storage capacity of 250,000 cubic metres (m<sup>3</sup>), and export LNG via tankers.

The Project underwent a comprehensive environmental assessment process from 2013 to 2015 and Woodfibre LNG received:

- An Environmental Assessment Certificate (EAC) for the Certified Project Area (CPA) under the British Columbia Environmental Assessment Act (BCEAA; EAC #E15-02) in 2015;
- An environmental assessment approval from Squamish Nation through the Squamish Nation Environmental Assessment Agreement (SNEAA) in 2015, and;
- A positive Federal Decision Statement (FDS) under the Canadian Environmental Assessment Act, 2012 (CEAA 2012) in 2016.



**Figure 1 - Location of the Woodfibre Liquefied Natural Gas Project**

In 2022, the Project will advance its pre-construction work, which includes specific remediation and rehabilitation activities, as well as the replacement of infrastructure which has reached its end of life and cannot be maintained in a state of good repair as is. These isolated activities will be performed between September 2022 and August 2023.

During pre-construction, the Project will have small teams of workers and contractors on the Project site, working with light and heavy equipment as required.

The purpose of the communication plan is to ensure that Indigenous groups are notified of any accidents or malfunctions associated with the pre-construction work of the Project.

## 2 Referenced Management Plans

This plan is developed as per Condition 11.5 of the FDS, which requires that Woodfibre LNG shall develop a communication plan in consultation with Indigenous groups, as defined in the FDS, to communicate accidents or malfunctions.

This communication plan is part of Woodfibre LNG’s environmental management system. Specifically, this plan is guided by the following documents, which establish the requirements, measures, and processes that inform the communication of accidents and malfunctions:

**Table 1 – Guiding Plans That Inform Communication for Accidents and Malfunctions**

<b>Pre-Construction Environmental Management Plan (PC-EMP)</b>
The PC-EMP documents the mitigation measures and monitoring processes to reduce potential adverse environmental effects by the Project. The PC-EMP identifies types of incidents that require reporting.
<b>Pre-Construction Emergency Response Plan (PC-ERP)</b>
The PC-ERP document is designed to provide a comprehensive management program that allows Woodfibre LNG to mitigate and respond to any pre-construction emergencies.
<b>Specific Communications Plan between Woodfibre LNG and Indigenous Groups</b>
Joint Communications Plan developed by Woodfibre LNG and Indigenous groups may also provide guidance regarding channels to communicate information about accidents and malfunctions.

## 3 Applicability

This document applies only to the Project activities performed for the pre-construction work (September 2022 to August 2023). This plan will be superseded by the Construction Phase Communication Plan for Accidents and Malfunctions.

## 4 Engagement for Communications Plan for Accidents and Malfunctions

Woodfibre LNG has made its communication plan for accidents and malfunctions available to Indigenous groups as per the FDS.

As noted above, Woodfibre LNG will update its communication plan for its Construction phase in 2023, and will provide additional opportunity for engagement with Indigenous groups over the course of 2022 and 2023.

## 5 Plan Activation

In accordance with the FDS Condition 11.5.1, the Project will communicate incidents (i.e. accidents, malfunctions, or natural disasters) that occur during pre-construction, and which have a potential adverse effect on the environment, to the Indigenous Nations identified below:

- Skwxwú7mesh Úxwumixw (Squamish Nation)
- Tseil-Waututh Nation (TWN)
- Cowichan Tribes First Nation
- Halalt First Nation
- Lake Cowichan First Nation
- Lyackson First Nation
- Musqueam Indian Band
- Penelakut Tribe
- Stz'uminus Nation
- Snuneymuxw First Nation
- Metis Nation British Columbia

The PC-EMP identifies the type of incidents (including accidents and malfunctions) which are anticipated to occur during the pre-construction work of the Project. Any incident that occurs on site or caused by the Project, which has an adverse effect on the environment, will be reported during this period.

Some incidents will qualify as emergencies. In this case, the PC-ERP will also be triggered. In this case, the Project uses the BC Oil and Gas Commission (OGC) Incident Classification Matrix (see Figure 2 below) as one tool to assess whether the incident requires an emergency response. While not formally listed within the OGC matrix, the Project also considers other environmental incidents (e.g. wildlife, cultural sites, sediment release) when determining whether an emergency response is required.

RANK	CONSEQUENCE (any one of the following)
4	<input type="checkbox"/> Major on site equipment or infrastructure loss <input type="checkbox"/> Major act of violence, sabotage, or terrorism which impacts permit holder assets <input type="checkbox"/> Reportable liquid spill beyond site, uncontained and affecting environment <input type="checkbox"/> Gas release beyond site affecting public safety
3	<input type="checkbox"/> Threats of violence, sabotage, or terrorism <input type="checkbox"/> Reportable liquid spill or gas release beyond site, potentially affecting public safety, environment, or property <input type="checkbox"/> HAZMAT worker exposure exceeding allowable <input type="checkbox"/> Major on site equipment failure
2	<input type="checkbox"/> Major on site equipment damage <input type="checkbox"/> A security breach that has potential to impact people, property or the environment <input type="checkbox"/> Reportable liquid spill or gas release potentially or beyond site, not affecting public safety, environment, or property
1	<input type="checkbox"/> Moderate on site equipment damage <input type="checkbox"/> A security breach that impacts oil and gas assets <input type="checkbox"/> Reportable liquid spill or gas release on location <input type="checkbox"/> **Occurrence of magnitude 4.0 or greater induced earthquake within 3 km of oil and gas operations or any earthquake which is felt on surface within a 3 km radius of oil and gas operations
0	<input type="checkbox"/> No consequential impacts

\*\* For this consequence criteria, a probability score of 2 or higher must be used.

**Figure 2 – BC OGC Incident Classification Matrix. See the PC-ERP for more information**

## 6 Principles to Guide Incident Communication

The Project intends to use incident communication to reinforce principles that support a strong relationship with Indigenous groups and the Project's commitment to sound management principles.

The following principles are proposed to guide incident communication:

- Woodfibre LNG strives to build strong, respectful, and productive working relationships with all Indigenous groups, potentially affected by the Project.
- Together, Woodfibre LNG and Indigenous groups are demonstrating that responsible resource projects can move from consultation to collaboration with the guidance and full participation of Indigenous groups.
- Woodfibre is working with the B.C. government, Canadian government and Skwxwú7mesh Úxwumixw regulators to satisfy the conditions placed on the Project.

## 7 Communication Procedure

The FDS Condition 11.5.2. requires Woodfibre LNG to identify the manner by which Indigenous groups shall be notified of incidents and the opportunities for Indigenous groups to assist emergency response communication.

The procedure serves as a guideline for on-site safety practices regarding communication. It is designed to ensure that whenever an incident occurs, Indigenous groups are sufficiently informed to:

- Reduce risks associated with any adverse health or safety issues associated with the incident
- Be aware of the performance of pre-construction work on site, and any adverse effects it may have on the local environment
- Have an opportunity to engage or assist the Project in its response to the incident
- Understand how the Project is taking corrective actions to reduce the risk of future incidents

### 7.1 Roles and Responsibilities for the Communication Procedures

The communication procedure includes the following key roles:

**Table 2 – Incident Communication Roles and Responsibilities**

Roles	Responsibilities
Woodfibre LNG Site Manager	<ul style="list-style-type: none"> <li>• Receive notification of the incident from the “first-on-scene” personnel</li> <li>• Assess and evaluate the incident</li> <li>• Declare activation of the PC-ERP if the incident is an emergency</li> <li>• Assign or be assigned as the role of Incident Commander</li> </ul>
Incident Commander	<ul style="list-style-type: none"> <li>• Manage and conduct all incident operations, including:               <ul style="list-style-type: none"> <li>– Ensure the safety of all personnel</li> <li>– Development of incident objectives, strategies, and tactics</li> <li>– Order and the release resources</li> </ul> </li> </ul>
Liaison Officer	<ul style="list-style-type: none"> <li>• Communicate and follow up with external parties such as Indigenous Groups, as identified in Section 5.</li> </ul>

	<ul style="list-style-type: none"> <li>• Coordinate with Agency Representatives from cooperating and assisting agencies or organizations.</li> <li>• Ensure assistance and cooperation between Indigenous Groups, agencies and organizations.</li> </ul>
Indigenous Group Representatives	<ul style="list-style-type: none"> <li>• Nominated by Indigenous Groups to receive incident communications</li> <li>• Responsible for working with the Project to disseminate incident communication to their Nation's Council and committees, as well as members of their Nation</li> <li>• Receive feedback from Nation members to address with Liaison Officer</li> </ul>

### 7.1.1 Crisis Communications Team

A Crisis Communications Team (CCT) has been formed to manage public communication in the event of an incident that triggers the PC-ERP. The CCT will be mobilized in the event of an emergency, and will oversee the communications activities performed by the roles identified above, as described in this plan, and ensure timely communication with Indigenous Groups.

## 7.2 Description of Communication Procedure

In the event that an accident or malfunction occurs that triggers this procedure, the Woodfibre LNG Site Manager will be informed, and will determine the appropriate response:

- If the incident does not warrant an emergency response, as per the PC-ERP, Indigenous group communication will follow the non-emergency procedure described in section 7.2.1
- If the incident does warrant an emergency response, the Project will trigger the PC-ERP, and Indigenous group communication will follow the procedure describes in 7.2.2.

### 7.2.1 Non-Emergency Communication

Reporting of incidents that do not trigger the emergency response plan will be guided by existing plans or agreements in place with Indigenous Groups. If a plan or agreement does not exist, the Project will use guidance provided by the BC EAO and IAAC when considering which Indigenous groups to inform.

Woodfibre LNG will work to adhere to the following steps for each Indigenous group to be notified:

- 1) The Site Manager informs the Liaison Officer of the incident.
- 2) The Liaison Officer confirms the Indigenous groups to notify, and provides e-mail notifications within 24 hours, or by the next business day. Refer to the Appendix for the e-mail addresses to be used for this notification.

- 3) Within 72 hours of the incident, the Liaison Officer will make a telephone call to the applicable Indigenous Groups, as per the contact list identified in the Appendix.

If Woodfibre LNG has developed a joint communication plan with an Indigenous group, the joint plan may identify additional communication channels which may be employed for non-emergency communication. In this case, the Liaison Officer would work with the Indigenous Group Representative to ensure that the other communication channels were employed as per the joint plan.

### 7.2.2 Emergency Communication

In the event that the Site Manager declares an emergency, Indigenous group communication would follow the requirements established in the PC-ERP. In this case, the following steps would occur:

- 1) The Site Manager identifies the role of Incident Commander (IC) to, oversee and manage the incident operations and mobilize the CCT.
- 2) All public communication will be led through the CCT, and align with the requirements established in the PC-ERP. At this time, a Liaison Officer will be identified.
- 3) Communication with Indigenous groups will be led by the Liaison Officer. When notifying Indigenous Groups of the incidents, the Liaison Officer will first provide verbal notification to the contacts identified in the Appendix and subsequently issue an e-mail notification.
- 4) The Liaison Officer will work with Indigenous Group Representatives to ensure that their Councils and Nation members are informed, as required. The Liaison Officer will provide updates as directed by the CCT, including:
  - a. Frequent updates as the incident progresses
  - b. Immediate notification when there is a material change to the incident or its resolution

During this time Indigenous Group Representatives may post information directly on their internal communication channels. The Liaison Officer will work with the Indigenous Group Representatives to provide messaging that may be posted.

- 5) Once the incident has been resolved, the Liaison Officer will issue a post-incident follow-up in written format to the Indigenous Group Representatives through email. This step is to confirm the status of the incident and to outline ongoing actions to mitigate impacts. A subsequent meeting may be required between the Project and Indigenous Groups to review this follow-up.

## 8 Opportunities for Indigenous Groups to Assist in Response Communication

Indigenous Groups can assist in the response to emergency incidents by developing joint communication channels with the Project for communicating incidents to their members, and identify joint communication opportunities, resources, and plans for incident communication. For example:

- During the incident, collaborate closely with Woodfibre LNG representatives.
- When the incident is over, work with Woodfibre LNG and use the joint communication resources to follow up with the affected areas, communicate ongoing impact, and pass on key messages to the public.

Woodfibre LNG will collaborate closely with Indigenous groups to support opportunities to improve communication and ensure that their members have access to incident notifications.

## 9 Contacts

The FDS Condition 11.5.3 requires that this plan should include the contact information of:

- The representatives of Woodfibre LNG that the Indigenous Groups may contact, and
- The representatives of Indigenous Groups that the Woodfibre LNG Proponent should notify.

The key personnel of Woodfibre LNG and the respective Indigenous Groups should be the first point of contact to issue or receive the notifications of emergency incidents.

For detailed contact information, refer to the Appendix or the Communication Plans for specific Indigenous Groups.

## Appendix – Detailed Contact Information

### I. Woodfibre LNG Representatives

Job Title	Name	Email	Phone
President, Woodfibre LNG	Redacted from the public document for privacy	Redacted from the public document for privacy	Redacted from the public document for privacy
Vice President, Government Relations			
Vice President, Regulatory			
Head, Legal			
Vice President, HR			
Director, Communications			
Site Manager			
Project Manager			
Senior Regulatory Manager			

### II. Indigenous Group Representatives

Indigenous Group	Contacts
Squamish Nation	Redacted from the public document for privacy.
Tsleil-Waututh Nation (TWN)	
Cowichan Tribes First Nation	
Halalt First Nation	
Lake Cowichan First Nation	
Lyackson First Nation	
Musqueam Indian Band	
Penelakut Tribe	
Stz'uminus Nation	
Snuneymuxw First Nation	
Metis Nation British Columbia	