



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

Revision and Sign-Off

Version	Summary of Material Changes
1.0	Initial version
2.0	Incorporate feedback received from Indigenous groups
3.0	Updated for Construction Phase
4.0	Incorporated feedback – changes to emergency contacts

Sḵwḵwú7mesh 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 Sḵwḵwú7mesh (Squamish). The Project is on the historical location of a Sḵwḵwú7mesh Úxwumixw (Squamish Nation) village known as Swíyát. Swíyát and Nexwnéwu7ts Átlk'a7tsem (Howe Sound) are tied to the cultural well-being of Sḵwḵwú7mesh Úxwumixw (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 Partnership recognizes the importance of these areas to the Sḵwḵwú7mesh stélmexw (Squamish People), and other Indigenous groups. Woodfibre LNG Limited Partnership 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 Sḵwḵwú7mesh-ulh swa7ewstem tkwi Swíyát. K'isintway tkwa Swíyát, iy Nexwnéwu7ts atll'a7tsem atl'ka7tsen tkwilhtima7 tl'a Sḵwḵwú7mesh-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.

Temíxwiýíkw chet wa naantem chet ti temíxw Swíyát

Chet wa sméñhemswit kwis ns7éyxñitas chet ti temíxw

We7ú chet kwis t'ichimwit 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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1 Introduction

Woodfibre LNG Limited Partnership (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 Skwxwú7mesh (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 (m³), 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.

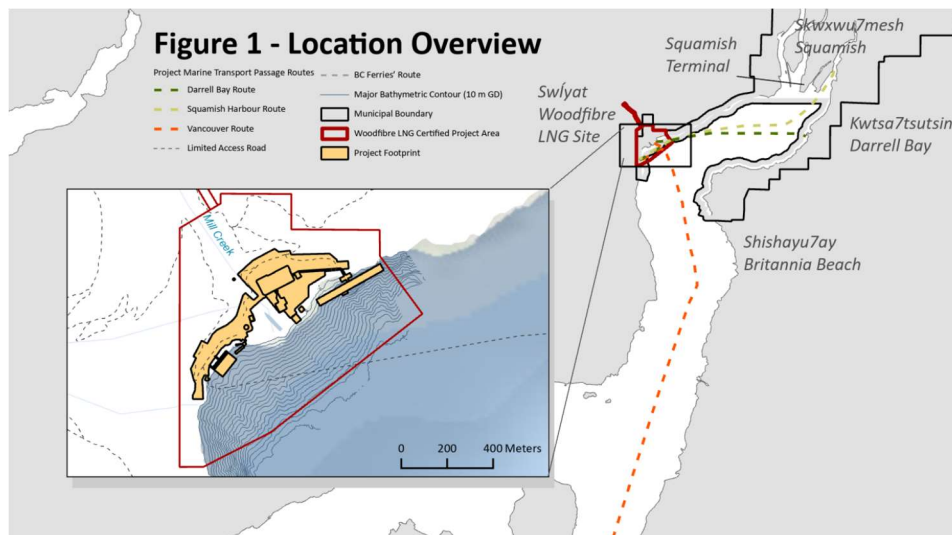


Figure 1 - Location of the Woodfibre Liquefied Natural Gas Project

In late 2023, the Project will commence its construction phase and covers all activities at the Project Site, worker accommodation, and marine transportation of personnel and materials to and from the Site.

The purpose of the communication plan is to ensure that Indigenous groups are notified of any accidents or malfunctions associated with the construction phase 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

Construction Environmental Management Plan (CEMP)
The CEMP documents the mitigation measures and monitoring processes to reduce potential adverse environmental effects by the Project. The CEMP identifies types of incidents that require reporting.
Emergency Response Plan (ERP)
The ERP document is designed to provide a comprehensive management program that allows Woodfibre LNG to mitigate and respond to any construction emergencies.
Specific Communications Plan between Woodfibre LNG and Indigenous Groups
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 Construction phase of the Project.

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.

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 the construction phase, 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 CEMP identifies the type of incidents (including accidents and malfunctions) which are anticipated to occur during the construction phase 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 ERP will also be triggered. In this case, the Project uses the BC Energy Regulator (BCER) Incident Classification Matrix (Figure 2 below) as one tool to assess whether the incident requires an emergency response. While not formally listed within the BCER matrix, the Project also considers other environmental incidents (e.g., wildlife, cultural sites, sediment release) when determining whether an emergency response is required.

STEP 1 - CONSEQUENCE RANKING		STEP 2 - PROBABILITY	
Rank	Any one of the following:	Rank	Any one of the following:
4	<input type="checkbox"/> Fatality <input type="checkbox"/> Reportable liquid spill or gas release to the environment that is uncontained and impacting water or sensitive terrain <input type="checkbox"/> Magnitude 4.0 or greater earthquake, wildfire <input type="checkbox"/> Major equipment or infrastructure loss <input type="checkbox"/> Major act of violence, sabotage, or terrorism which impacts Woodfibre LNG assets or public safety	4	<input type="checkbox"/> The incident is uncontrolled and there is little chance that the hazard will be under control in the near term. Significant external assistance required to remedy the situation
3	<input type="checkbox"/> Worker(s) require hospitalization <input type="checkbox"/> Off-site reportable liquid spill or gas release that is not contained or potentially affecting public safety, environment, or property <input type="checkbox"/> Moderate equipment or infrastructure loss, major on-site equipment failure <input type="checkbox"/> Threats of violence, sabotage, or terrorism	3	<input type="checkbox"/> Imminent and/or intermittent control of the incident is possible. Capability of using internal and/or external resources to manage and bring the hazard under control in the near term
2	<input type="checkbox"/> First aid treatment required for on-site worker(s) / minor injuries. <input type="checkbox"/> Off-site reportable liquid spill or gas release that is contained <input type="checkbox"/> On-site reportable liquid spill or gas release that is not contained <input type="checkbox"/> Minor equipment or infrastructure loss, minor on-site equipment failure <input type="checkbox"/> A security breach that has potential to impact people, property, or the environment	2	<input type="checkbox"/> Control of the incident may have deteriorated but imminent control of the hazard is probable. It is unlikely that the incident will further escalate.
1	<input type="checkbox"/> No worker injuries <input type="checkbox"/> On-site reportable liquid spill or gas release that is contained <input type="checkbox"/> Minor or no equipment or property damage <input type="checkbox"/> Minor security breach with no potential to impact people, property, or the environment	1	<input type="checkbox"/> The incident is contained or controlled, and it is unlikely that the incident will escalate. There is no chance of additional hazards.
STEP 3- DETERMINE EMERGENCY LEVEL			
Add your Consequence and Probability ranking to determine Emergency Level		Total	Emergency Level
		1 or 2	Alert
		3 or 4	Level 1 Emergency
		5 or 6	Level 2 Emergency
		7 or 8	Level 3 Emergency

Figure 2 – BCER Incident Classification Matrix. See the 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 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"> • Receive notification of the incident from the “first-on-scene” personnel • Assess and evaluate the incident. • Declare activation of the ERP if the incident is an emergency. • Assign or be assigned as the role of Incident Commander.
Incident Commander	<ul style="list-style-type: none"> • Manage and conduct all incident operations, including: <ul style="list-style-type: none"> – Ensure the safety of all personnel. – Development of incident objectives, strategies, and tactics. – Order and then release resources.
Liaison Officer	<ul style="list-style-type: none"> • Communicate and follow up with external parties such as Indigenous Groups, as identified in Section 5. • Coordinate with Agency Representatives from cooperating and assisting agencies or organizations. • Ensure assistance and cooperation between Indigenous Groups, agencies and organizations.
Indigenous Group Representatives	<ul style="list-style-type: none"> • Nominated by Indigenous Groups to receive incident communications. • Responsible for working with the Project to disseminate incident communication to their Nation’s Council and committees, as well as members of their Nation. • Receive feedback from Nation members to address with Liaison Officer

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 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 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 ERP, and Indigenous group communication will follow the procedure described 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 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 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 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.