



Federal Decision Statement  
Annual Report  
2025

Énoncé de décision fédérale  
Rapport annuel  
2025

*Prepared for: Impact Assessment Agency of Canada/  
Préparé pour l'Agence d'évaluation d'impact du Canada*

*Date | 31 March 2026 / Le 31 mars 2026*

## Executive Summary

Woodfibre LNG General Partner Inc. (Woodfibre LNG) is constructing a liquefied natural gas (LNG) export facility (the Project) on the former Woodfibre Pulp and Paper Mill site in Nexwnéwu7ts Átlk'a7tsem (Howe Sound), approximately seven kilometers south of Skwxwú7mesh (Squamish). The Project is located in British Columbia on the historical location of a Skwxwú7mesh Úxwumixw (Squamish Nation) village known as Swiyát. The land is a fee simple, industrially zoned, brownfield site with more than 100 years of industrial use and deep-water marine access.

The Project was subject to environmental assessment processes administered by the Province of British Columbia, Skwxwú7mesh Úxwumixw, and the Government of Canada. The Project received environmental assessment approvals from all three forementioned levels of government during 2015 and 2016. On 17 March 2016 the Canadian Environmental Assessment Agency, now the Impact Assessment Agency of Canada (IAAC), issued a Federal Decision Statement (FDS) as part of a substituted process under the *Canadian Environmental Assessment Act, 2012* (SC 2012, c. 19, s. 52). The FDS was re-issued on 07 March 2018 to account for material changes to the Certified Project Description. On 26 July 2024, the FDS was amended under the *Budget Implementation Act, 2024*, to modify and move Condition 5.1 to Condition 6.1.4 and to remove Condition 5.2. On 11 June 2025, Woodfibre LNG notified IAAC of the proposed changes to the designated project definition and the Project pursuant to Conditions 1.9 and 2.10 of the FDS for the installation and operation of a second floatel and associated facilities. The amendment was approved and issued on 06 November 2025.

This report has been prepared pursuant to FDS Condition 2.6 to report on the implementation of conditions that were applicable to the scope of project activities having occurred during 2025

During the reporting period from 01 January 2025 to 31 December 2025, Woodfibre LNG continued construction activities across both terrestrial and marine work areas as the project advanced from early civil works into facility construction. Onshore construction included extensive cut and fill activities, soil improvement works, and controlled rock blasting to support facility grading and access. Concrete foundations were poured for multiple permanent structures, including pipe racks, process modules, and supporting infrastructure. As foundations were completed, prefabricated modules were delivered to site and installed. Underground utilities and trenching works also commenced to support permanent services across the site. Temporary construction infrastructure, including laydown areas, access roads, and construction support facilities, continued to operate to support ongoing works.

Marine construction activities progressed throughout the year. The Material Offloading Facility was completed, enabling regular delivery of large, prefabricated modules and materials by marine transport. Piling works continued for the Floating Storage Tanks, including installation of permanent piles and associated marine infrastructure. Shoreline works included revetment installation and continued stabilization of marine interfaces. Infrastructure associated with Floatel #2 was installed, including berth access systems and mooring components, to support workforce accommodation during peak construction periods.

During 2025, Woodfibre LNG continued to advance required conditions outlined in the FDS relating to applicable construction activities, as outlined in this annual report. The condition implementation schedule was last provided to IAAC on 2025 March 31. Consultation with Indigenous Groups (referred to as Aboriginal groups in the FDS) continued throughout 2025; the results of this consultation are summarized in this report. When expressed or shared, the views and information communicated by Aboriginal Groups were given full and impartial consideration.

## Résumé

Woodfibre LNG General Partner Inc. (Woodfibre LNG) construit une installation d'exportation de gaz naturel liquéfié (GNL) (le projet) sur le site de l'ancienne usine de pâtes et papiers Woodfibre à Nexwnéwu7ts Átlk'a7tsem (Howe Sound), à environ sept kilomètres au sud de Skwxwú7mesh (Squamish). Le projet est situé en Colombie-Britannique, sur le site historique d'un village de la Skwxwú7mesh Úxwumixw (Nation Squamish) connu sous le nom de Swiyát. Le terrain est un site industriel désaffecté en fief simple, zoné industriel, utilisé à des fins industrielles depuis plus de 100 ans et disposant d'un accès maritime en eau profonde.

Le projet a fait l'objet de processus d'évaluation environnementale administrés par la province de la Colombie-Britannique, la Skwxwú7mesh Úxwumixw et le gouvernement du Canada. En 2015 et 2016, le projet a obtenu les autorisations en matière d'évaluation environnementale des trois ordres de gouvernement susmentionnés. Le 17 mars 2016, l'Agence canadienne d'évaluation environnementale, devenue l'Agence d'évaluation d'impact du Canada (AEIC), a publié la déclaration de décision dans le cadre d'un processus de substitution en vertu de la *Loi canadienne sur l'évaluation environnementale*, 2012 (L.C. 2012, ch. 19, art. 52). Le même document a été publié de nouveau le 7 mars 2018 pour tenir compte des changements importants apportés à la description du projet certifié. Le 26 juillet 2024, la déclaration de décision a été modifiée en vertu de la *Loi d'exécution du budget de 2024*, afin de modifier et de déplacer la condition 5.1 vers la condition 6.1.4 et de supprimer la condition 5.2. Le 11 juin 2025, Woodfibre LNG a informé l'AEIC des modifications proposées à la définition du projet désigné et au projet conformément aux conditions 1.9 et 2.10 de la déclaration de décision pour l'installation et l'exploitation d'un deuxième hôtel flottant et des installations connexes. La modification a été approuvée et publiée le 6 novembre 2025.

Le présent rapport a été préparé conformément à l'article 2.6 de la déclaration de décision afin de rendre compte de la mise en œuvre des conditions applicables à la portée des activités du projet ayant eu lieu au cours de l'année 2025.

Au cours de la période visée par le rapport, soit du 1<sup>er</sup> janvier 2025 au 31 décembre 2025, Woodfibre LNG a poursuivi ses activités de construction dans les zones terrestres et maritimes, le projet évoluant de la phase initiale des travaux de génie civil à celle de la construction des installations. Les travaux de construction à terre ont compris d'importants travaux de déblaiement et de remblayage, des travaux d'amélioration des sols et des opérations de dynamitage contrôlé afin de faciliter le nivellement et l'accès aux installations. Des fondations en béton ont été coulées pour plusieurs structures permanentes, notamment des supports de tuyaux, des modules de traitement et des infrastructures de soutien. Une fois les fondations achevées, les modules préfabriqués ont été livrés sur le chantier et installés. Les travaux d'installation des réseaux souterrains et d'excavation de tranchées ont également commencé afin d'assurer les services permanents sur l'ensemble du site. Les infrastructures de chantier temporaires, notamment les aires de déchargement, les routes d'accès et les installations de soutien à la construction, ont continué à assurer le bon déroulement des travaux en cours.

Les activités de construction maritime ont avancé tout au long de l'année. L'installation de déchargement des matériaux a été achevée, permettant ainsi la livraison régulière de grands modules préfabriqués et de matériaux par transport maritime. Les travaux de battage de pieux se sont poursuivis pour les réservoirs de stockage flottants, notamment l'installation de pieux permanents et des infrastructures maritimes associées. Les travaux sur le littoral ont consisté à installer des revêtements et à poursuivre la stabilisation des interfaces marines. Les infrastructures associées à l'hôtel flottant #2 ont été installées, notamment les systèmes d'accès aux postes d'amarrage et les composants d'amarrage, afin d'héberger la main-d'œuvre pendant les périodes de pointe de la construction.

Au cours de l'année 2025, Woodfibre LNG a continué à faire avancer les conditions requises énoncées dans la déclaration de décision concernant les activités de construction, comme indiqué dans le présent rapport annuel. La dernière version du calendrier de mise en œuvre des conditions a été fournie à l'AECI le 31 mars 2025. La consultation des nations autochtones (appelées groupes autochtones dans la déclaration de décision) s'est poursuivie tout au long de l'année 2025. Les résultats de cette consultation sont résumés dans le présent rapport. Les opinions et les renseignements communiqués par les groupes autochtones, une fois exprimés ou partagés, ont été pris en considération de manière complète et impartiale.

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**ACRONYM AND ABBREVIATIONS**

<b>Abbreviation/Acronym</b>	<b>Definition</b>
%	Percent
µPa	micropascal
Al	Aluminum
BC	British Columbia
CCME	Canadian Council of Ministers of the Environment
Cd	Cadmium
CPA	Certified Project Area
Cr	Chromium
Co	Cobalt
CO <sub>2</sub>	Carbon dioxide
CSIMP	Community Services and Infrastructure Management Plan
Cu	Copper
dB	decibels
DO	Dissolved oxygen
EA	Environmental Assessment
EAC	Environmental Assessment Certificate
EAO	Environmental Assessment Office
ECCC	Environment and Climate Change Canada
EM	Environmental Monitor
EWAL	Estuarine aquatic life
F	Fluoride
FAA	<i>Fisheries Act</i> Authorization
FDS	Federal Decision Statement
Fe	Iron

Abbreviation/Acronym	Definition
FTAC	Fisheries Technical Advisory Committee
FWAL	Freshwater aquatic life
IAAC	Impact Assessment Agency of Canada
IDZ	Initial dilution zone
ISQG	Interim Sediment Quality Guideline
km	kilometre
LNG	Liquefied Natural Gas
m	metre
Mg/L	Milligrams per litre
MUG	Marine User Group
MMO	Marine mammal observer
MOF	Material Offloading Facility
MWAL	Marine water aquatic life
PAH	Polycyclic aromatic hydrocarbons
Pb	Lead
PCB	Polychlorinated biphenyls
PEL	Probable Effects Level
POPC	Parameters of potential concern
Project	the Woodfibre Liquefied Natural Gas Export Facility
QP	Qualified Professional
SARA	<i>Species at Risk Act</i>
SPLrms	Sound pressure levels
SQG	Sediment quality guidelines
TSS	Total suspended solids
V	Vanadium

Abbreviation/Acronym	Definition
VOC	Volatile organic compounds
WDA	Waste Discharge Authorization
Woodfibre LNG	Woodfibre LNG General Partner Inc.
WQG	Water quality guidelines
Zn	Zinc

## 1.0 INTRODUCTION

Woodfibre LNG General Partner Inc. (Woodfibre LNG) will construct and operate a liquefied natural gas (LNG) export facility (the Project) on the site of the former Woodfibre Pulp and Paper Mill in Nexwnéwu7ts Átlk'a7tsem (Howe Sound), approximately seven kilometers (km) south of Sk̓w̓x̓wú7mesh (Squamish). The Project is on the historical location of a Sk̓w̓x̓wú7mesh Úxwumixw (Squamish Nation) village known as Swiyát in British Columbia (BC). The land is a fee simple, industrially zoned, brownfield site with more than 100 years of industrial use and deep-water marine access. Figure 1 shows the Project location and Figure 2 shows the layout, Certified Project Area (CPA) and key Project components.

The Project was subject to Environmental Assessment (EA) processes administered by the Province of BC, Sk̓w̓x̓wú7mesh Úxwumixw (Squamish Nation) and Government of Canada. The Project was assessed through a substituted process and the BC Environmental Assessment Office (EAO) issued Environmental Assessment Certificate (EAC) #E15-02 for the Project on 26 October 2015.

The EAO have to-date approved four amendments to the EAC. The first amendment to the EAC for changes to the cooling process was issued on 12 July 2017. The second amendment, to clarify the definition of construction, was issued on 19 July 2019. The third amendment, to add a temporary floating worker accommodation (the Floatel), and associated infrastructure to the Certified Project Description, was issued on 01 November 2023. Amendment four was received November 4<sup>th</sup>, 2025, for the addition of another floatel (Floatel #2) and associated facilities to house additional workers.

On 25 October 2020, the EAO approved a request to extend the date by which the designated Project was required to have substantially started construction and issued a certificate extension order to 26 October 2025, under Section 31 of the BC *Environmental Assessment Act*.

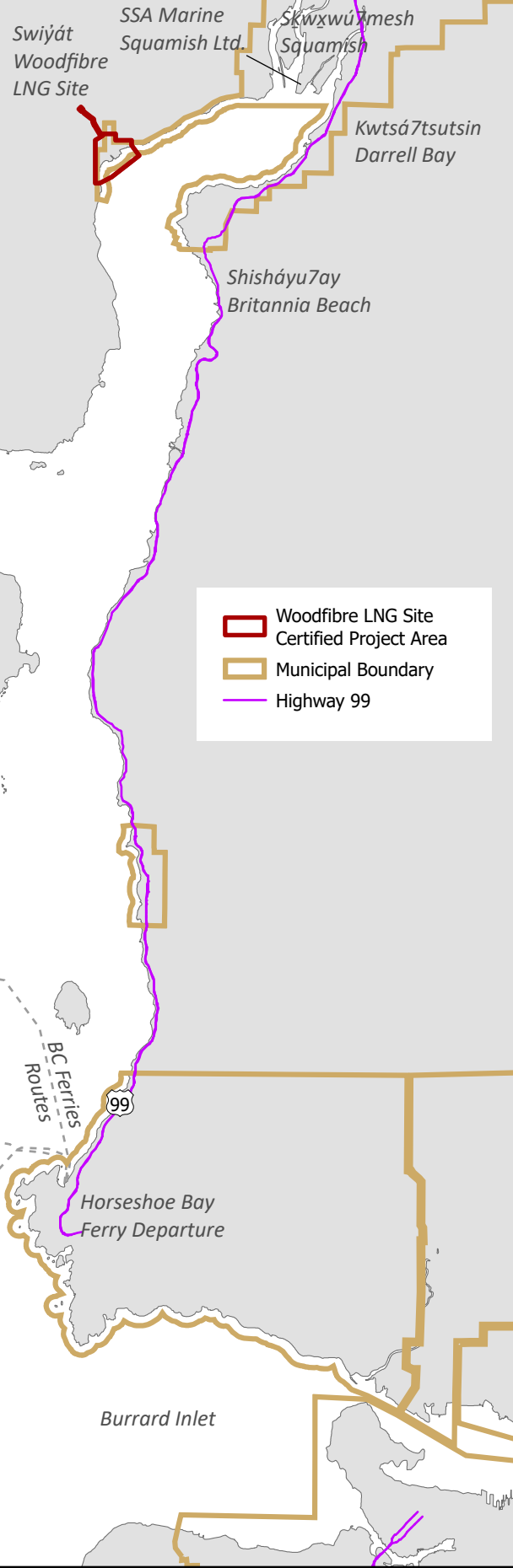
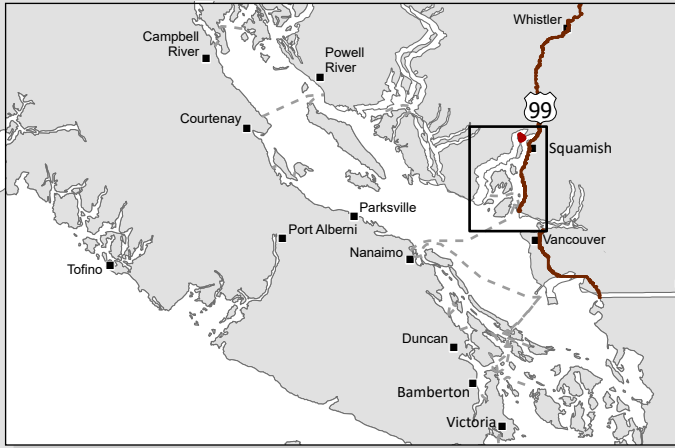
Sk̓w̓x̓wú7mesh Úxwumixw (Squamish Nation) conducted an independent review of the application for an EAC under its own EA process and on 14 October 2015 entered into the Squamish Nation Environmental Assessment Agreement (SNEAA) with Woodfibre LNG Limited.

The Canadian Environmental Assessment Agency, now the Impact Assessment Agency of Canada (IAAC), issued a Federal Decision Statement (FDS) as part of the substituted process under the *Canadian Environmental Assessment Act, 2012* (SC 2012, c. 19, s. 52) on 17 March 2016. Similarly, the FDS for the designated Project was re-issued on 07 March 2018 to accommodate the same material change to the Project as accounted for by the first amendment to the EAC. On 07 June 2022, Woodfibre LNG applied to IAAC to amend two conditions of the FDS relating to the marine mammal exclusion zones and marine water and sediment quality (Conditions 3.8 and 6.4). The amendment was approved and the amended FDS was issued on 04 August 2023. On 26 July 2024, the FDS was amended under the *Budget Implementation Act, 2024*, to modify and move Condition 5.1 to Condition 6.1.4 and to remove Condition 5.2. On 11 June 2025, Woodfibre LNG notified IAAC of the proposed changes to the designated project definition and the Project pursuant to Conditions 1.9 and 2.10 of the FDS for the installation and operation of Floatel #2 and associated facilities. The amendment was approved and issued on 06 November 2025.

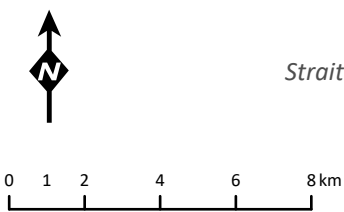
The 2025 annual report is intended to demonstrate the proactive approach Woodfibre LNG is taking across all phases of the Project when engaging in regulatory processes. Woodfibre LNG aims to achieve this through transparency, cooperation and continued compliance with all Project commitments and regulatory conditions, including conditions outlined in the FDS. Furthermore, this report is intended to highlight Woodfibre LNG's commitment to delivering on the socioeconomic and environmental benefits highlighted throughout the EA process for the Project, while ensuring impacts are minimized.

This report has also been developed in accordance with the information requirements outlined in FDS Conditions 2.6.1 through 2.6.5 and in compliance with reporting and publication objectives described in FDS Condition 2.7 and 2.8, respectively. Concurrent with submission to IAAC, this report will be posted publicly to the Woodfibre LNG website. IAAC and Indigenous Groups (referred to as Aboriginal Groups in FDS Section 1.1), defined as Sk̓wx̓wú7mesh Úxwumixw (Squamish Nation), Tseil-Wauthuth Nation, Cowichan Tribes First Nation, Halalt First Nation, Lake Cowichan First Nation, Lyackson First Nation, Musqueam Indian Band, Penelakut Tribe, Stz'uminus Nation, and Métis Nation British Columbia will be notified of its availability once posted.

# Figure 1 - Location Overview

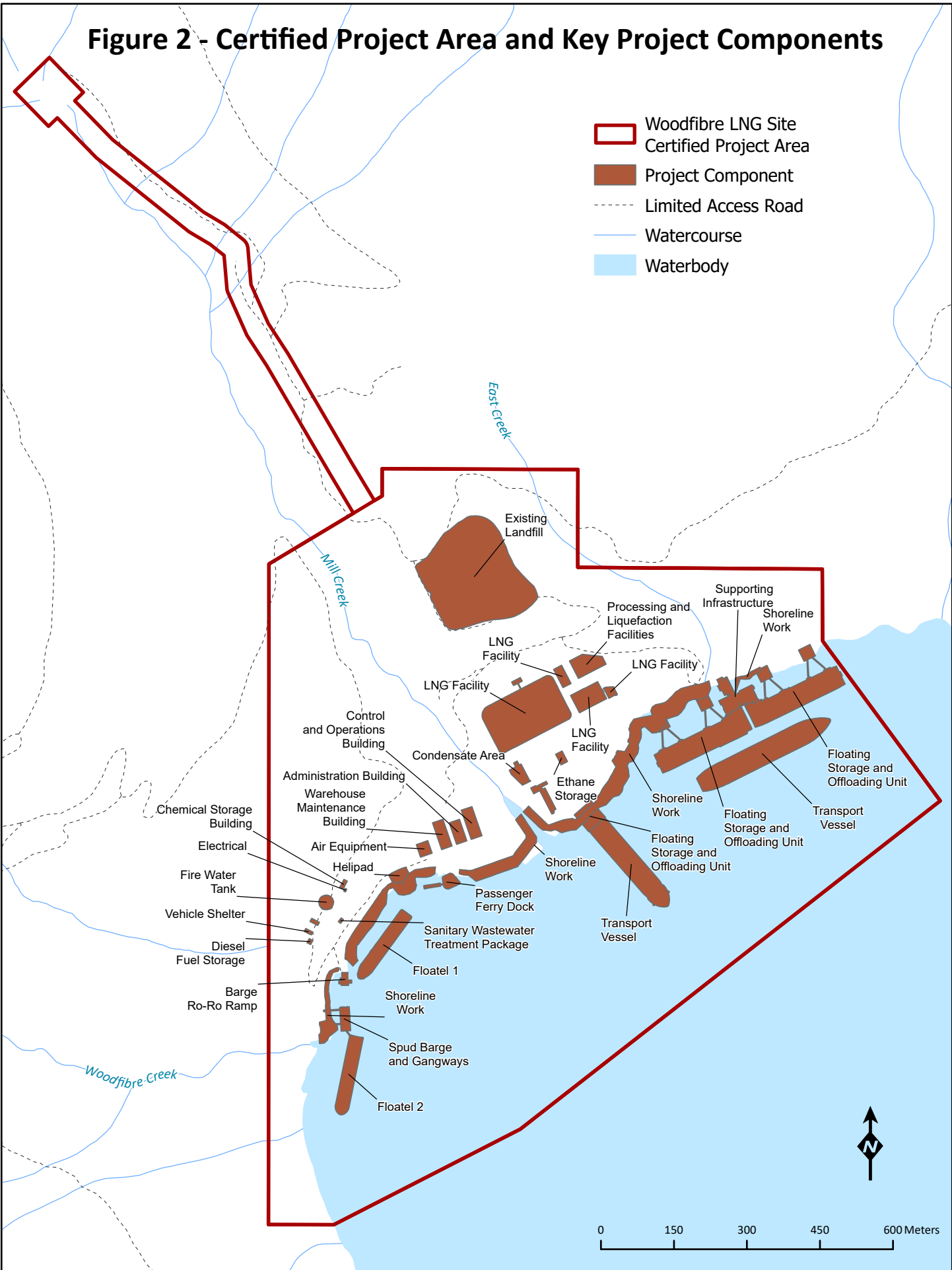


- Woodfibre LNG Site Certified Project Area
- Municipal Boundary
- Highway 99



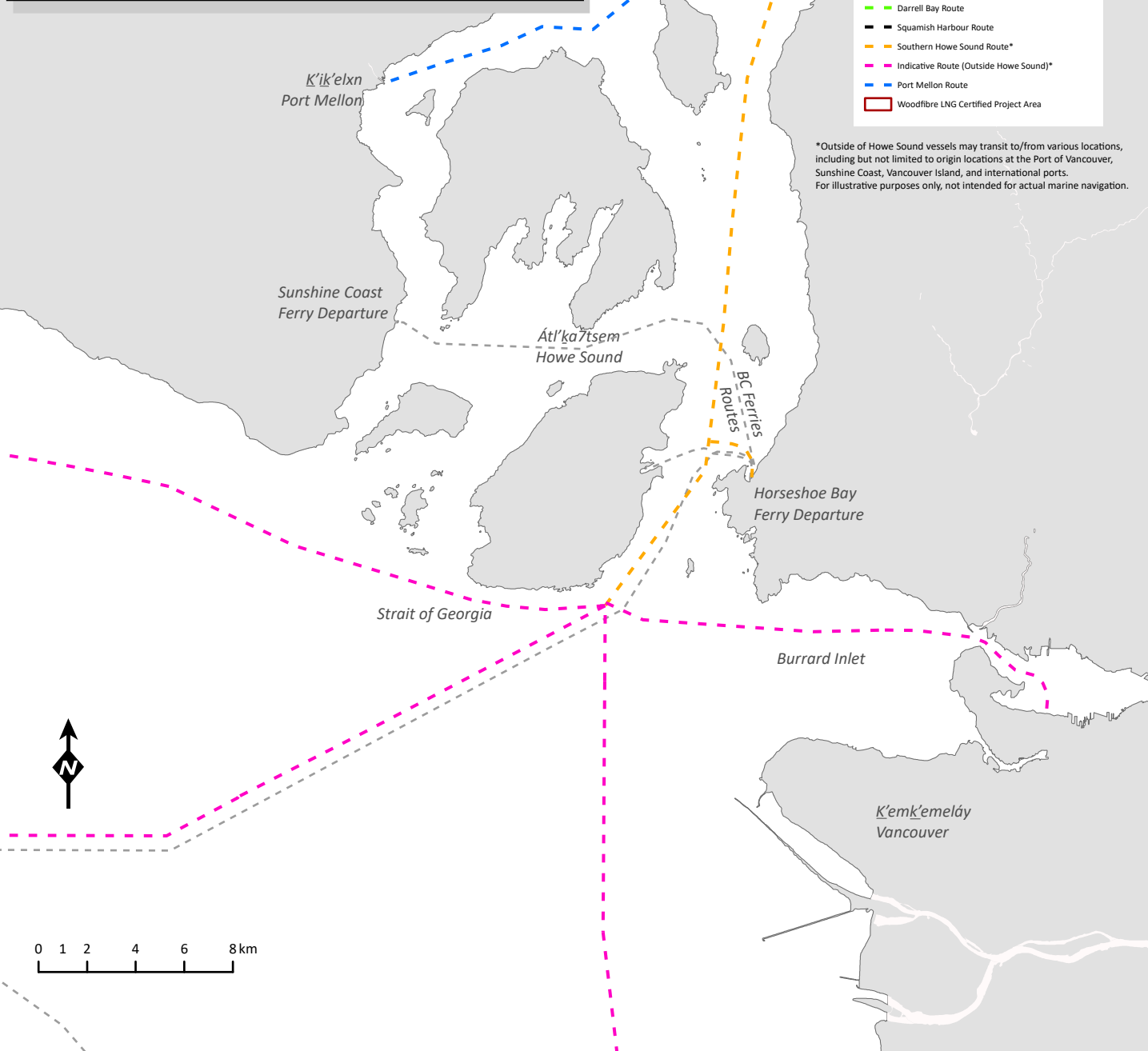
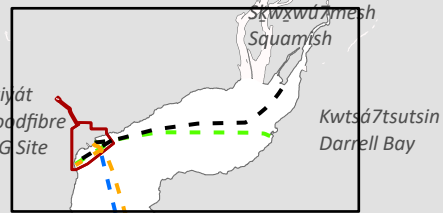
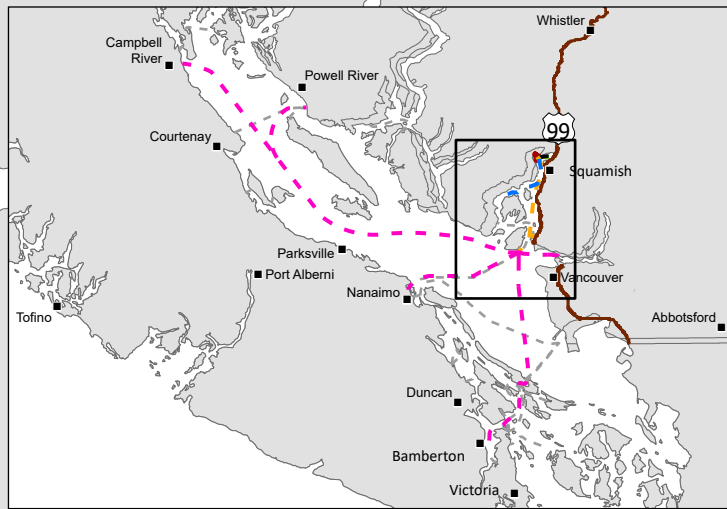
# Figure 2 - Certified Project Area and Key Project Components

- Woodfibre LNG Site Certified Project Area
- Project Component
- Limited Access Road
- Watercourse
- Waterbody



S:\1232\projects\12322102\figures\reports\env\ronmental\_Management\_Plans\EMP\_figures.aprx Layout 2 - Certified Project Area Revised: 2025-10-27 By: siparker

**Figure 3 - Marine Transport Project Access Routes**



\*Outside of Howe Sound vessels may transit to/from various locations, including but not limited to origin locations at the Port of Vancouver, Sunshine Coast, Vancouver Island, and international ports. For illustrative purposes only, not intended for actual marine navigation.

## 2.0 PROJECT ACTIVITIES

The following sections summarize the site activities, schedule, and material changes to the Project within 2025.

### 2.1 Site Activities

Woodfibre LNG's construction contractor and subcontractors completed extensive cut and fill activities, soil improvement works, and controlled rock blasting to support facility grading and. Concrete foundations were poured for multiple permanent structures, including piperacks, process modules, and supporting infrastructure. As foundations were completed, prefabricated modules were delivered to site and installed. Underground utilities and trenching works also commenced to support permanent services across the site. Temporary construction infrastructure, including laydown areas, access roads, and construction support facilities, continued to operate to support ongoing works. Marine construction activities progressed throughout the year. The Material Offloading Facility (MOF) was completed, enabling regular delivery of large, prefabricated modules and materials by marine transport. Piling works continued for the Floating Storage Tanks, including installation of permanent piles and associated marine infrastructure. Shoreline works included revetment installation and continued stabilization of marine interfaces. Infrastructure associated with Floatel #2 was installed, including berth access systems and mooring components, to support workforce accommodation during peak construction periods. Water was withdrawn from Mill Creek and Woodfibre Creek to support construction.

### 2.2 Implementation Schedule

Pursuant to FDS Condition 12, Woodfibre LNG has provided IAAC an updated Implementation Schedule on 31 March 2025. An update to this Implementation Schedule will be submitted to IAAC in 2027 in compliance with Condition 12.2. Pursuant to FDS Condition 7.4, the updated Implementation Schedule will be sent to Indigenous Groups defined in Section 1.1 of the FDS and will be posted on the Woodfibre LNG website pursuant to FDS Condition 2.8.

### 2.3 Proposed Material Change to the Certified Project Description

In June 2025, Woodfibre LNG notified IAAC of proposed changes to the Project pursuant to Condition 2.10 of the Decision Statement for the installation and operation of Floatel #2 and associated facilities. The amendment was approved 06 November 2025.

## 3.0 FOLLOW-UP MONITORING

As defined in the FDS, follow-up monitoring programs have been designed to verify the accuracy of the predictions made during the Project's EA and to determine the effectiveness of mitigation measures implemented to eliminate or reduce potential effects to the environment. Further, follow-up monitoring programs to support adaptive management strategies, and inform future similar activities in such a way that promotes sustainable development have been developed by Qualified Professionals (QPs). The follow-up monitoring programs to comply with FDS conditions include:

- Fish and Fish Habitat, as it relates to FDS Conditions 3.1 through 3.10
- Migratory Birds, as it relates to FDS Conditions 4.2 and 4.3
- Human Health, as it relates to FDS Condition 6.5
- Land Use, as it relates to FDS Condition 7.2
- Species at Risk, as it relates to FDS Condition 9.3

The following sub-sections provide information on the applicability of these follow-up monitoring programs to the scope of on-site works that occurred in 2025. Where follow-up monitoring programs were applicable, the results are described. Implementation of the follow-up monitoring programs, developed pursuant to applicable conditions of the FDS, was undertaken by QPs who, through education, experience, and knowledge relevant to a particular matter, could be relied on by the Project to provide accurate and defensible advice in support of Project compliance.

Consistent with FDS Condition 13.1, which requires the Project to retain all records pertaining to the ongoing compliance of Project activities with FDS Conditions, the results of observations and data (field measurements and/or laboratory analysis) collected in response to the implementation of a follow-up monitoring program, have been recorded in the form of environmental monitoring reports and include details described in Conditions 13.1.1 through 13.1.5. Pursuant to FDS Condition 13.2, records documenting compliance will be retained for 25 years following decommissioning by Woodfibre LNG, at a facility in Canada and close to the Project location.

### 3.1 Fish and Fish Habitat

In-water works during construction in 2025 included:

- Shoreline demolition and revetment.
- Marine pile installation and excavation, shoreline revetment.
- Woodfibre Creek water withdrawal for floatel and general construction use.
- Marine shipping operations (construction materials, equipment, etc.).
- Floatel operations continued (water withdrawal, wastewater treatment, and marine shipping).
- Nearshore blasting.
- Floatel #2 arrival and associated infrastructure installation.

Pursuant to FDS Condition 3.1, the majority of in-water works were completed during the applicable timing windows of least risk. In-water work concluded on 31 January 2025 and started again on 16 August 2025, in compliance with the least-risk window for Howe Sound. In consultation with the Department of Fisheries and Oceans Canada (DFO), Sḵw̱x̱wú7mesh Úxwumixw (Squamish Nation), Tsleil-Waututh Nation, and Musqueam Indian Band *Fisheries Act* Authorization (FAA) Amendment 22-HPAC-01346 was approved for the period of July 15 to August 15, 2025 allowing M07/14 monopile installation and MS-4 nearshore blasting to occur outside of the least-risk timing window. Any activities undertaken during this period were conducted in accordance with the methods and mitigation measures described in the Amendment (22-HPAC-01346). Continuous hydroacoustic monitoring over the reporting period confirmed that Project underwater noise objectives were met, no exceedances to applicable thresholds were observed, and no evidence that fish or marine mammals were exposed to noise exceeding Project criteria.

Woodfibre LNG consulted DFO and Sḵw̱x̱wú7mesh Úxwumixw (Squamish Nation) to obtain FAA Amendment 22-HPAC-01346, issued on October 21, 2025, which approved additional project components within the project description, including the installation, operation and decommissioning of a second floating worker accommodation vessel during construction (Floatel #2). This Amendment introduced additional mitigation requirements related to potential effects on Herring spawn and glass sponges resulting from the installation of Floatel #2.

In accordance with condition 2.2.18 of the Amendment, mitigation measures were implemented in January 2026 to reduce potential effects to herring spawning on the hull of Floatel #2. In addition, condition 2.2.17 required the implementation of mitigation measures to avoid impact to Glass Sponges, which included ROV surveys and subsequent mooring anchor realignment prior to Floatel #2 arriving to the Project site. Any activities undertaken during this period were conducted in accordance with the methods and mitigation measures described in the Amendment (22-HPAC-01346).

Pursuant to FDS Condition 3.2.1, environmental monitors (EMs) completed frequent erosion and sediment control inspections to confirm that erosion and sediment control measures were adequately implemented to mitigate potential adverse effects on fish and fish habitat from changes in water quality during construction works. Erosion and sediment control measures implemented included:

- Daily monitoring (e.g., water quality turbidity monitoring, visual inspections).
- Preparing for significant rain events (pre-significant rainfall inspections).
- Installation and maintenance of silt fencing, geofabric/riprap.
- Operation of Total Suspended Solids (TSS) settling system, east wastewater treatment plant, and discharge of treated effluent from the east and west sedimentation ponds as authorized by BC Energy Regulator Waste Discharge Authorization (WDA) PE-111578.

Events in 2025 related to erosion and sediment control are described in Appendix B Fish and Fish Habitat Non-Conformances and Corrective Actions.

No revegetation of disturbed riparian areas occurred in 2025, pursuant to FDS Condition 3.2.2.

Silt curtains, silt fencing, and straw wattles were installed and regularly inspected during near-shore and in-water works, pursuant to FDS Condition 3.2.3. When deficiencies were noted during regular inspections, additional mitigation measures were installed, or the deficiencies were corrected through better installation. Appendix B Fish and Fish Habitat Non-Conformances and Corrective Actions describes events where deficiencies were found and corrective actions were implemented.

Pursuant to FDS Condition 3.2.4, during concrete pour activities, additional in-situ water samples were taken to assess for elevated turbidity and pH. Appendix B Fish and Fish Habitat Non-Conformances and Corrective Actions describes events of high turbidity and corrective actions.

No instream construction activities occurred in Mill Creek in 2025, therefore there was no isolation or fish salvage completed, as required by FDS Conditions 3.3.1 and 3.3.2.

Pursuant to FDS Condition 3.3.3., Woodfibre LNG maintained minimum flows in Mill Creek and Woodfibre Creek to support fish and fish habitat. Adequately sized fish screens were installed on the Mill and Woodfibre Creek water intakes, pursuant to FDS Condition 3.3.4. Water withdrawal was stopped when minimum instream flow requirements were not met. Instream flow requirements were monitored via remote hydrometric stations.

Pursuant to FDS Condition 3.3.5, the Best Management Practices for Pile Driving and Related Operations were considered when conducting pile installation and other in-water and near-water activities. Blasting activities were not conducted within 500 metres (m) of cetaceans or hauled-out pinnipeds and hydroacoustic monitoring took place during activities that could cause underwater noise.

Pursuant to FDS Condition 3.3.6, bubble curtains were implemented to reduce the intensity of underwater noise during pile installation. The Project owner considers all activities that demonstrate potential to generate underwater noise exceeding sound pressure levels (SPLrms) 160 decibels (dB) re 1 micropascal ( $\mu\text{Pa}$ ) to constitute an underwater noise generating activity, requiring mitigation measures.

Prior to nearshore blasting, a sediment curtain and bubble curtain were installed, as well as marine exclusion zones, pursuant to FDS Condition 3.4. Hydroacoustic monitoring was conducted to confirm that the blast did not exceed levels for protection of fish outside of the bubble curtain. Marine animals (e.g., crab, urchin) were salvaged prior to the installation of sediment curtains and bubble curtains. Prior to the blast, a SONAR scan was conducted to look for fish presence in the work area. It was noted that one blast on 12 October 2025 at FST4 was observed to generate fly rock with connection to Howe Sound, near or in excess of 150m from the blasting location. The zone of influence was estimated by marine mammal observers (MMOs) to be approximately 170m, presenting risk of fly rock direct contact to pinnipeds within 150m, without risk of exposure to underwater noise exceeding SPLrms 190 dB re  $1\mu\text{Pa}$ . Following observation of fly rock, the QP of Record recommended a minimum 250m in-water pinniped exclusion zone until such time that risk of fly rock generation was negligible.

Pursuant to FDS Condition 3.3.4 and 3.6, no marine water intakes were designed, installed, or operated in 2025.

A leachate effluent marine discharge system with a diffuser is in operation and pursuant to FDS Condition 3.7, mitigation measures have been implemented. Mitigation measures include Woodfibre LNG working closely with onsite wastewater treatment plant operators to ensure discharge meets the quality criteria in accordance with leachate permit PE-1239 section 1.1.3. Effluent samples are collected and data is reviewed in a timely manner to ensure compliance and timely notification of exceedance and action item plans. Woodfibre LNG conducts routine inspection and maintenance of the leachate outfall. Throughout 2025, effluent met the discharge criteria therefore no additional mitigation measures were implemented.

Hydroacoustic monitoring to characterize underwater sound was completed during activities that may generate underwater noise, pursuant to FDS Condition 3.8.1. This included marine pile installation and land-based activities such as dynamic soil compaction and blasting. Once underwater noise was characterized and data was reviewed, activities were either considered to generate underwater noise and mitigation measures as required under FDS Condition 3.8 were implemented, or they were not considered to generate underwater noise and additional mitigation measures were not required.

Marine mammal exclusion zones were implemented during in-water activities that generated underwater noise (as described in FDS Condition 3.8.1). A MMO program was implemented, pursuant to FDS Condition 3.8.5 and activities did not start if marine mammals were observed within the exclusion zones, pursuant to FDS Condition 3.8.6. A MMO program was implemented prior to and during blasting activities within 100 m of Howe Sound. During blasting, hydroacoustic monitoring was conducted near source, 150 m, and 500 m from shore. Results were below underwater noise criteria for marine mammals.

Pursuant to FDS Condition 3.14, the 2025 Marine Fish and Fish Habitat Environmental Effects Annual Monitoring Report is in the process of being developed. The Report will discuss the monitoring results conducted in 2025 to verify the accuracy of the EA and effectiveness of the mitigation measures identified under Conditions 3.1 to 3.10 and additional adaptive management practices in consultation with Sk̓wx̓wú7mesh Úxwumixw (Squamish Nation). Once finalized, the report will be posted on Woodfibre LNG's website under [Regulatory Filings](#). See Section 6.0 for additional details regarding consultation and engagement.

### 3.2 Migratory Birds

The protection of migratory birds, their nests, and eggs was considered during the construction phase activities in the CPA during the reporting period.

Barn swallow nests, whether occupied or not, are considered a residence under the *Species at Risk Act* (SARA) during the residence period.<sup>1</sup> Under section 73 of the SARA, Environment and Climate Change Canada (ECCC) issued permit SARA-PYR-2023-0793 on May 11, 2023, which is valid until May 7, 2026. As compensation for the loss of barn swallow nest sites, Woodfibre LNG constructed an artificial barn swallow nesting structure in April 2023.

In 2025, pursuant to FDS Condition 2.4 and condition 13 of permit SARA-PYR-2023-0793, a QP undertook monitoring activities related to use of the artificial barn swallow nesting structure to determine effectiveness. Two nest cups were occupied by barn swallows in June 2025, and a third nest cup was occupied in August 2025. By September 11, 2025, barn swallows had finished nesting, and a total of nine nest cups contained nest materials, with one nest cup also containing two unhatched eggs. A permit report was submitted to Canadian Wildlife Service on November 16, 2025.

In early 2025, Woodfibre LNG applied for an additional permit under Section 73 of the SARA to conduct nest management activities at active construction sites within the CPA. The permit was then approved by ECCC in March 2025 (SARA-PYR-2025-0908) and is valid until August 31, 2027.

In 2025, pursuant to FDS Condition 2.4 and Condition 10 and 11 of permit SARA-PYR-2025-0908, a QP undertook monitoring activities for nesting barn swallows and other migratory birds to determine efficacy measures to exclude barn swallows out of the active construction areas. During the 2025 breeding season, 21 partial and 2 complete (empty) nests were removed as permitted under SARA-PYR-2025-0908. Over the 2025 migratory bird nesting season, two active residences were discovered, with potential for additional active nests likely present. Prior to the 2025 migratory bird nesting window, exclusion measures were precautionarily placed by the direction of a QP on stationary objects and equipment. Areas covered with exclusion measures proved effective in reducing nest placement opportunities. Throughout the nesting period, areas where barn swallows were observed placing material were effectively mitigated using exclusion measures. A permit report was submitted to Canadian Wildlife Service on January 19, 2026.

Pre-clearing nest sweeps were carried out during the construction phase prior to execution of clearing or ground disturbance. Acoustic and behaviour monitoring was conducted during activities within the bald eagle nest buffer. The bald eagles were unsuccessful at producing a juvenile last year, however there were no indications of disturbance resulting from the Project as determined by the QP.

Blasting was scheduled to occur within 1 km of provincially mapped marbled murrelet suitable habitat during the marbled murrelet nesting season in 2025 (late April to early September). Although no marbled murrelet nests have been identified within 1 km of the 2025 blast areas, Woodfibre LNG implemented the precautionary approach for managing disturbance to suitable habitat and engaged a QP to determine mitigation measures, if required. To meet these measures, the QP conducted noise monitoring throughout the CPA during active blasting between early March 2024 and October 2025. On August 19, 2025, a measured value exceeded the recommended 10% increase (less than 500 m away), additional mitigation measures were implemented such as blast optimization. Additional noise monitoring was undertaken during active blasting in August 2025 to assess the potential for marbled murrelet

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<sup>1</sup> May 1 or the date when adults are first seen building or occupying the nest, whichever is earlier, to August 31 or the date when a bird is last seen at the nest, whichever is later. Barn Swallow (*Hirundo rustica*): residence description; available at: <https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry/residence-descriptions/barn-swallow.html/>.

nesting disturbance and determine whether mitigations are required. Based on results of noise readings, review of literature on marbled murrelet disturbance, and location of marbled murrelet suitable nesting habitat relative to blasting areas, it was determined that the 2025 blasting would not disturb nesting marbled murrelets.

In 2025, there were 13 migratory bird mortalities onsite (one blue provincially listed [double-crested cormorant]) and two unknown bird species. Where applicable, wildlife sanctuaries and rescue services were contacted and mortalities were reported to the following organizations: BC Conservation Service, ECCC, and the Interagency Wild Bird and Influenza.

Woodfibre LNG sought advice from a QP in September 2024 on how to deter barn swallows from flying into the vessel interior of the Floatel; the QP recommended netting be installed at the stern which was implemented in April 2025 prior to barn swallow arrival on site for the nesting season. Barn swallows were observed nesting on Deck 11 of the Floatel in 2025. To avoid disturbing the occupied nest, the doors to Deck 11 were locked to restrict crew access until the nest was no longer occupied. The nest was removed on August 24, 2025, under permit SARA-PYR-2025-0908. In October 2025, Woodfibre LNG engaged a QP to review incidents of migratory bird mortalities related to the Floatel from September 2024 to September 2025 to determine suspected cause, identify potential higher-risk areas for bird strikes, and identify opportunities to apply adaptive mitigations. On December 3, 2025, a QP completed an assessment of the Floatel to identify areas of high risk to migratory birds, nesting and human interactions, and to identify mitigations to reduce those risks. Woodfibre LNG is working with Skwxwú7mesh Úxwumixw (Squamish Nation) and bird QPs to implement bird strike mitigations on the Floatel and Floatel #2 prior to the start of the migratory bird nesting season in 2026.

Pursuant to FDS Condition 4.3, a pre-construction phase follow-up program for migratory birds was developed in 2022. The follow-up program outlines the mitigation measures applicable to migratory birds and the steps that will be taken to determine the effectiveness of mitigation measures used to protect migratory birds. The air-cooling system has not been installed; therefore, the follow-up program was not implemented during this 2025 reporting period.

### 3.3 Human Health

Pursuant to FDS Condition 6.1, best management practices were implemented to minimize noise and air emissions during construction phase activities. Measures implemented are outlined in the Construction Environmental Management Plan. Measures addressing greenhouse gas emissions, exhaust gases from fuel combustion and dust were all implemented and include maintenance of vehicles in good working order, preventing idling of vehicles, and turning off machinery when not in use. Dust control measures implemented included covering stockpiles, maintenance of paved surfaces, watering, and minimizing drop distances of materials. Measures which have been implemented for minimizing noise include the use of less noisy machinery such as vibratory hammers for piling, the orientation of machinery away from receptors, scheduling works at specific times where background noise is higher and utilizing existing onsite barriers for screening nearby receptors and installing seismographs at designated locations prior to blasting activities.

Pursuant to FDS Condition 6.2, Woodfibre LNG has developed an internal protocol for noise complaints through the online ticketing system located on the Woodfibre LNG website at <https://woodfibrelng.ca/contact-us/>. Members of the public are clearly directed on this webpage to utilize the ticketing system for raising any questions, concerns, or complaints. In 2025, Woodfibre LNG was in compliance with noise and wake limits, however, there were 18 noise complaints received as a result of the Amia X passenger vessel, two noise complaints related to the bus transportation for workers, and one complaint regarding noise at the LB barge at the Port of Vancouver. Woodfibre LNG responded to all complaints stating corrective actions were to be implemented. Mufflers were

installed on Amia X in May 2025, and the passenger vessel captains were reminded to slow down. As of December 2025, Floatel #2 arrived at site and the Amia X was used to transport crew and material to site at a slower speed.

No permanent lighting has been installed for the construction phase. Construction lighting is predominantly via light plants and some semi-permanent (construction only) lights. Pursuant to FDS Condition 6.3, mitigation measures such as shielding, directional shades, LED bulbs and discrete hours of operations have been implemented. Where possible, light is pointed away from sensitive receivers (e.g., marine environment). In the light plants that do not have LED bulbs, frosted lenses have been fitted, which emits dimmer lighting than clear lenses. Crews are directed to turn off lighting once work in an area is complete, and some lights have sensors, timers, or motion detectors to reduce unnecessary nighttime illumination. Lighting mitigation measures are implemented on both floatels as well; only critical lighting is used.

On February 29, 2025, the BC EAO identified a non-compliance regarding construction lighting being left on during daylight hours and barge cranes that were fully lit pointing towards the marine environment. The contractor reminded work crews to ensure lighting was turned off during daylight hours and to position any lighting away from sensitive receptors. The BC EAO noted in subsequent inspections in 2025 that lighting had been turned off during daylight hours.

Pursuant to FDS Condition 6.4, water and sediment quality for the Project were monitored in 2025. Construction continued in 2025 and activities included overburden and bedrock excavation, site grading and levelling, pouring of concrete foundations and construction of contact and non-contact water management facilities. Discharges of construction contact water to the receiving environment commenced in 2024 under the Waste Discharge Authorization (WDA) Effluent Permit (PE-111578) issued 9 February 2024. The East Wastewater Treatment Plant, East Sedimentation Pond and West Sedimentation Pond were commissioned for discharge to Howe Sound in 2024. The authorized East and West Catchment discharge locations have an initial dilution zone (IDZ) where effluent mixes with Howe Sound surface waters. The IDZ is defined in permit PE-111578 and extends 150 m from each point of discharge into Howe Sound. It is expected that parameters with discharge limits (i.e., pH, TSS, copper [Cu], lead [Pb], vanadium [V], and zinc [Zn]) may exceed marine water quality guidelines within the IDZ; therefore, the IDZ stations were not evaluated for Project influence, and these data are not included.

Receiving environment water quality and sediment quality monitoring was conducted in accordance with the requirements of the WDA Effluent Permit and the Marine Water Quality Management and Monitoring Plan for Construction. The water quality results were screened against Canadian Water Quality Guidelines (WQG) developed by the Canadian Council of Ministers of the Environment (CCME) and ECCO for the protection of freshwater, estuarine and marine water aquatic life (FWAL, EWAL and MWAL, respectively). Results for marine sediment samples were screened against the Canadian Sediment Quality Guidelines (SQG) developed by the CCME (Interim Sediment Quality Guideline [ISQG] and Probable Effects Levels [PEL]) for the protection of aquatic life.

Water quality monitoring was conducted at the mouths of Woodfibre, Mill and East Creeks and at background stations upstream of the CPA in each of the creeks. Marine water was monitored at four nearshore stations within the CPA and at two reference stations north and south of the CPA. Field parameters were routinely collected, and laboratory analysis was conducted for physical and general parameters, nutrients, total and dissolved metals, methylmercury, dioxins and furans, polycyclic aromatic hydrocarbons (PAH) and volatile organic compounds (VOC). In-marine works monitoring consisted only of field measurements. Water quality samples collected at background stations upstream in Woodfibre, Mill and East Creek as well as marine reference stations outside the CPA reflect background conditions and were not evaluated for Project influence and these data were not included.

In-water marine works were advanced in 2025 for dredging, foreshore construction and pile driving. Water quality was monitored in work areas each day the in-water marine works were active and daily at receiving environment stations specified in the Marine Water Quality Management and Monitoring Plan for Construction.

Marine sediment quality was monitored within the CPA, in the vicinity of the floatels and within the IDZs in July 2025. Laboratory analysis for CPA, floatel and IDZ sediment samples was conducted for pH, moisture content, particle size, total organic carbon, total inorganic carbon, and metals. Marine sediment samples collected within the CPA and within the IDZs were also tested for methyl mercury, hydrocarbons, PAH, light and heavy extractable petroleum hydrocarbons, polychlorinated biphenyls (PCB), and dioxins and furans.

### Freshwater and Estuarine Water Quality

The 2025 freshwater and estuarine water exceedances of WQGs are summarized in Table 2 of Appendix C Water Quality Exceedances. Parameter concentrations were within WQGs for the protection of FWAL and EWAL, with the exception of field pH, field dissolved oxygen (DO), fluoride (F), total aluminum (Al), total cadmium (Cd), total cobalt (Co), total chromium (Cr), total iron (Fe), and dissolved Cu. Parameter concentrations above WQGs were within the ranges observed in the pre-construction baseline monitoring program at Woodfibre, Mill, and East creeks or within ranges observed at background stations in the creeks and are therefore not attributable to the Project except for the following occasions:

- Field DO measured in the Mill Creek estuary (SW-03) was below the lower limit of the EWAL guideline on November 27. This is an isolated occurrence, and it is not considered to indicate there is on-going influence from construction activities.
- F concentrations were 1.0 to 2.6 times greater than the FWAL guideline for samples collected from East Creek from April to December 2025. Follow-up investigations indicate there was limited LNG facility construction activity along the lower tributary of East Creek near the sampling station, and that similar concentrations were observed upstream on East Creek, outside the CPA.
- Exceedances of the FWAL guidelines for total metals (Al, Cd, Cr, Co, Cu and Fe) were observed in East Creek on January 23 (Fe), February 21 (Al, Cr, Fe), April 24 (Cr), May 8, 12 and 14 (Cr), August 5 (Al), August 15 (Al, Cd, Cr, Co and Fe), September 11 (Al, Cr, Fe), and October 12 and 17 (Fe) and November 13 (Al, Cd, Cu and Fe). The exceedances are generally attributed to elevated TSS from sources outside the CPA and were typically associated with runoff during heavy rains.
- Total Al and total Fe concentrations exceeded the FWAL guidelines, respectively, in samples collected from Mill Creek on February 19 (Al and Fe), March 27 (Al) and November 6 (Al). The total Al and Fe exceedances are attributed to particulate-bound forms of the metals. These were isolated occurrences. The monitoring data indicate there is no on-going project influence on Mill Creek.
- The total Al concentration was 1.9 times greater than the FWAL guideline for a sample collected from Woodfibre Creek on November 13. Al was present as both the particulate-bound and dissolved form of the metal. It is speculated that heavy background runoff flows into Woodfibre Creek during a significant rainstorm on November 13 contributed to the measured Al concentrations on that day.

### Marine Water Quality

The 2025 marine water quality guideline exceedances are summarized in Table 3 of Appendix C Water Quality Exceedances. Parameter values fell within the WQG limits for the protection of MWAL, with the exception of field pH, field DO, and total hexavalent Cr. Field pH was above the upper limit of the WQG in two

shallow water samples (0.5 m below the water surface) in May and below the lower limit of the WQG in one shallow water sample (2 m below the water surface) in May. Although above the range of background field pH observed at marine reference stations, values above the upper limit of the WQG are an isolated occurrence. The monitoring data indicate there is no on-going influence from construction activities. The field pH value below the lower limit of the WQG is within ranges observed in the pre-construction baseline monitoring program and within ranges observed at marine reference stations. Field DO measurements were below the lower limit of the WQG in most deep-water samples and infrequently in shallow water samples. Low concentrations of DO are indicative of influence from the deeper saline waters in the northern basin of Howe Sound and are a natural condition of the marine water in the CPA. Total hexavalent Cr, which measures hexavalent and trivalent Cr, was not detectable in all of the estuarine and marine water monitoring samples; however, detection limits were occasionally elevated [ $<0.0025$  and  $<0.0050$  milligrams per litre (mg/L)] above the hexavalent Cr WQG (0.0015 mg/L). For all samples with raised hexavalent Cr detection limits, the corresponding total Cr concentrations ranged from  $<0.00050$  to  $0.00051$  mg/L, below the hexavalent Cr WQG value (0.0015 mg/L) indicating the guideline was met in these samples.

The 2025 in-water marine works water quality screening results are summarized in Table 4 of Appendix C Water Quality Exceedances. *In situ* marine water quality monitoring was conducted several times a day in the vicinity of the works when in-marine works were active. Field pH was occasionally below the lower limit of the WQG for the protection of MWAL in shallow water samples. Surface waters in the near-shore environment are likely influenced by freshwater inputs with lower pH. Infrequent elevated field turbidity observed at shallow water in-marine works monitoring stations were isolated occurrences that occurred on single day increments. Elevated field turbidity observed at CPA stations is generally attributed to background conditions in Howe Sound waters at the time of sampling.

#### Marine Sediment Quality

The 2025 marine sediment screening results are summarized in Table 5 of Appendix C Water Quality Exceedances. Concentrations of several total metals (arsenic, Cu, Pb, mercury and Zn) were above the corresponding CCME ISQG and PEL by up to 22 times and 3.8 times, respectively, in CPA, floatel and IDZ sediments. Of the metal parameters, concentrations of Cu most frequently exceeded the guideline. Concentrations of PAHs (acenaphthene, acenaphthylene, anthracene, benzo(a)anthracene, benzo(a)pyrene, benzo(b&j)fluoranthene, benzo(g,h,i)perylene, chrysene, dibenz(a,h)anthracene, fluoranthene, fluorene, 2-methylnaphthalene, naphthalene, phenanthrene and pyrene) in the samples collected from the east and west IDZ areas, in the vicinity of the floatels and CPA stations were up to 1,682 and 78 times, respectively, above the corresponding CCME ISQG and PEL reference values.

Concentrations of polychlorinated biphenyl (PCB) aroclor 1254 were below detection limits in all marine sediment samples except for two samples. The marine sediment sample collected in the west IDZ showed a detectable Aroclor 1254 concentration that was 1.6 times greater than the CCME ISQG value. The total PCB parameter is the sum of the results for the individual PCB aroclors, and total PCB was reported to be not detected in all samples except for one sample; however, the reported detection limits were up to 4.3 times greater than the CCME ISQG value. The one west IDZ sediment sample, where total PCB was reported as detected, showed a concentration that was 5.8 times greater than the ISQG value. For dioxins and furans, the lower-bound and upper-bound PCDD/F TEQ concentrations in all samples were up to 60 and 67 times, respectively, greater than the CCME ISQG value, and up to 2.4 and 2.6 times, respectively, greater than the CCME PEL value.

The concentrations of parameters that exceed CCME reference values in marine sediments were within the upper ranges observed during baseline monitoring, except for the following occasions:

- Total Pb concentrations in two of three samples collected at the Floatel monitoring station FLO-02 were 1.1 and 1.3 times greater than the CCME ISQG value.
- In one marine sediment sample collected from the east IDZ area, the total mercury concentration was 4.1 times greater than the CCME ISQG value.
- In one marine sediment sample collected from the west IDZ area, the total Zn concentration was 1.9 times greater than the CCME ISQG value.
- In one marine sediment sample collected from the west IDZ, the PCB Aroclor 1254 concentration was 1.6 times greater than the CCME ISQG value.
- Detection limits for total PCBs were occasionally above the upper range observed during baseline monitoring. In one west IDZ sediment sample, a detectable total PCBs concentration was 5.8 times greater than the ISQG value.
- PAHs are above baseline ranges in some of the samples collected from the west IDZ (n=1 to 6 samples).
- The lower-bound and upper-bound PCDD/F TEQ concentrations in six samples collected from the west IDZ.

The replicate samples indicate there is non-homogeneous distribution of total metals, PAHs, dioxins and furans in the IDZ and CPA sediments, in particular in the west IDZ (west of Mill Creek) where almost all of the elevated parameter concentrations were observed. The high variability of the replicate samples from the IDZ-W-SED station (compared to IDZ-E-SED station) indicates that parameters present at elevated concentrations (*i.e.*, above the ranges from the sediment baseline) are heterogeneously distributed in the sediments, in particular in the west IDZ. Field records indicate that creosote, which contains PAHs, was observed at the time of sampling in some of the samples with elevated PAHs. Observations during site investigation and remediation conducted prior to construction of the LNG facility suggest the non-homogeneous distribution of sediment grain size and material composition, as well as parameters present at elevated concentrations, are due to influence from the historic pulp mill activities.

Pursuant to FDS Condition 6.5, the marine tissue monitoring program was conducted as follow-up actions to satisfy FDS Conditions 6.5.2 and 6.5.3, focusing on confirming predictions made by the Human Health Risk Assessment model and evaluating Parameters of Potential Concern in tissue samples. In 2025, the mid-construction phase of the monitoring program was implemented, with sample collection occurring in September at the Woodfibre site. The sampling aimed to assess potential changes in the quality of seafood, with specimens gathered from both the project area and from Squamish Harbour. The program focused on Dungeness crabs (*Metacarcinus magister*; 45 samples) and English sole (*Parophrys vetulus*; 30 samples). Meat and hepatopancreas from Dungeness crabs, along with sole meat, were collected from the same locations and using the same protocols as prior studies to enable temporal comparisons. Elemental analyses include organic compounds such as PAHs, PCDD/Fs, methylmercury, tributyltin, and metals, including methylmercury. Bureau Veritas in Burnaby, BC is performing the tissue analyses, with results expected early 2026. The study results will be summarized in the 2026 FDS annual report.

### 3.4 Land Use

Pursuant to FDS Condition 7.1, Woodfibre LNG has developed a communications protocol for marine transportation during construction. The protocol is outlined in the Construction Marine Transportation Management and Monitoring Plan which is posted on Woodfibre LNG's website. Information required to be

communicated to the public as part of the protocol can be found on the website at: <https://woodfibrelng.ca/construction/marine-transportation-schedule/>. In support of FDS Condition 7.2, data was collected in 2025 by buoys installed in 2022 that will be used in the follow-up monitoring for wake effects. Pursuant to FDS Condition 7.3, Woodfibre LNG developed an Access Protocol for Indigenous Groups, which was shared with Indigenous Groups and will allow opportunities for marine and land access around the CPA.

### 3.5 Archaeological and Heritage Resources

Pursuant to FDS Condition 8.1.2 to 8.1.3, an Archaeological and Heritage Resource Management Plan for construction was developed in consultation with Indigenous Groups prior to the start of the construction phase. This plan outlines procedures and practices for on-site monitoring of construction phase activities that may impact an archaeological or heritage structures, sites, or things. The Archaeological and Heritage Resource Management Plan also includes a Chance Find Management Plan. No chance finds occurred in 2025. An Archaeological Awareness and Chance Find Management Plan program was also developed during 2023. The program is provided to all staff working in the CPA and is conducted through a one hour long in person presentation. It provides participants with information about the significance of archaeological materials and the legal requirements surrounding them.

### 3.6 Listed Species at Risk

No clearing activities or demolition of buildings occurred in 2025, therefore, no pre-clearing surveys were undertaken pursuant to FDS Condition 9.1. However, to support construction planning for the raw water supply intake, for operations, bat surveys were undertaken in 2025 at the derelict structures associated with the former pulp mill water supply infrastructure along Mill Creek. Ultrasonic autonomous recording units were deployed in May and June at the greenhouse, surge tank, and penstock wooden structure to passively record bat activity through to December 3, 2025. In addition, bat emergence surveys were completed in July and October to confirm bats exiting the derelict structures. Bats were confirmed occupying the greenhouse, surge tank, and penstock wooden structure during the maternity roosting period. Federal species at risk detected on the passive acoustic surveys included little brown myotis (*Myotis lucifugus*), hoary bat (*Lasiurus cinereus*), and silver-haired bat (*Lasionycteris noctivagans*). Little brown myotis was detected on a handheld EchoMeter as bats were observed exiting the greenhouse and surge tank during the emergence survey in July, indicating these structures support a maternity roost for this species. Little brown myotis was also detected on the passive acoustic surveys at the greenhouse and surge tank during the fall swarming and return to hibernation period and during the emergence survey on October 30, 2025, at the surge tank, indicating these structures likely support a hibernaculum for this species. Detections of hoary bat and silver-haired bat are likely associated with tree roosts within the forest surrounding the derelict structures rather than the structures themselves; these two species do not overwinter in the region.

Pursuant to FDS Condition 9.2 and 9.3, a bat QP inspected the artificial bat roosts (i.e., nursery boxes and rocketboxes) for occupancy in 2025. In July 2025, a small amount of guano was observed beneath the nursery boxes and the rocketbox at the landfill site, indicating that some bats had used these bat boxes intermittently in 2025. DNA analysis of the guano confirmed the bats were long-legged myotis (*Myotis evotis*). A large amount of guano was observed beneath the pair of nursery boxes at the laydown site and four bat carcasses (three little brown myotis pups and one Yuma myotis [*Myotis yumanensis*] pup) were found on the guano screen. The little brown myotis carcasses were non-volant (i.e., not capable of flight) pups, confirming these boxes were maternity roosts for this species. The carcasses had apparent neck or head injuries, suggesting the pups fell from the boxes. The fourth carcass was identified as a volant (flying capable) pup male Yuma myotis with non-visible injuries. The pup carcasses were at different stages of growth and decomposition, suggesting the mortalities were not the result of a single event. DNA analysis of the guano also confirmed bats at the laydown site included little brown myotis.

In August 2025, emergence surveys were completed on three evenings at the laydown site to estimate the number of bats occupying the pair of nursery boxes. The counts ranged from 251 to 279 bats. One additional bat carcass was observed on the guano screen on August 3, 2025, but it was not collected for identification. A bat QP prepared a report on the 2025 findings and recommendations and Woodfibre LNG shared the report with Sk̓wx̓wú7mesh Úxwumixw (Squamish Nation). Woodfibre LNG reported the bat mortalities to [info@bcbats.ca](mailto:info@bcbats.ca). Woodfibre LNG is currently engaging with Sk̓wx̓wú7mesh Úxwumixw (Squamish Nation) and bat QPs to develop and implement additional mitigations and monitoring of the bat boxes for the 2026 maternity roosting season to improve effectiveness and reduce bat mortality risk in the artificial bat roosts. No other roosting structures were monitored for usage by little brown myotis in 2025, pursuant to FDS Condition 9.3.

Pursuant to FDS Condition 9.3, a follow-up program for little brown myotis was developed in 2022 to verify the accuracy of the EA as it pertains to the environmental effects of the air-cooling system on little brown myotis. The air-cooling system has not been installed; therefore, the follow-up program was not implemented during this 2025 reporting period.

## 4.0 ADDITIONAL MITIGATION MEASURES

Woodfibre LNG is committed to a careful and precautionary approach to the implementation of mitigation measures required to comply with the FDS conditions. Mitigation strategies are based on validated methods and models supported by assurances of QPs that specialize in their respective areas of practice. Informed by the best available information and knowledge, including community and Indigenous Traditional Knowledge, the follow-up monitoring programs described in Section 3 of this document were subject to processes of adaptive management which require that implemented measures be evaluated and adjusted as required to achieve a set objective. It is a systemic approach for continually improving existing management strategies by learning from earlier experiences.

### 4.1 Accidents and Malfunctions

Pursuant to FDS Condition 11.5, Woodfibre LNG has developed a communication plan related to accidents and malfunctions. As described in Section 6.1, Indigenous Groups were invited to provide input on the plan, which was then incorporated.

### 4.2 Emergency Response Plans and Communications with Indigenous Nations

The Emergency Response Plan was updated to incorporate helipad landing zone coordinates, updated contact lists, and Floatel #2, BC Energy Regulator forms, and the addition of a hazardous planning zone in 2025. Pursuant to FDS Condition 11.3, an Emergency Response Plan for construction was developed and consulted on with Indigenous Groups and relevant federal and provincial agencies in 2023.

## 5.0 OFFSETTING

Pursuant to FDS Condition 3.11, and in-line with the offsetting requirements set out in the applicable environmental legislation, project permits and relevant policies, offsetting plans to compensate for residual Project effects to fish and fish habitat were developed during 2024. Detailed engineering design for marine offsetting, as required by the FAA, started at the end of 2024 and will continue into 2026.

A detailed Offset Effectiveness Monitoring Plan was submitted to the Department of Fisheries and Oceans Canada on 15 March 2024, with an updated version provided on 15 July 2025. No habitat offsetting has been built yet.

## 6.0 CONSULTATION AND ENGAGEMENT

Woodfibre LNG implemented Indigenous Groups and stakeholder consultation activities in 2025.

### 6.1 Indigenous Consultation

Woodfibre LNG remains committed to conducting robust consultation activities with all of the Indigenous Groups stipulated in the FDS. Pursuant to FDS Condition 3.6.3, this section summarizes Woodfibre LNG's engagement activities with Indigenous Groups in 2025 related to FDS conditions. Engagement activities will be ongoing for the life of the Project and will continue to be tailored to the phase of the Project and associated activities planned at the time of engagement.

Woodfibre LNG respectfully acknowledges that the Project is being built on the historical location of a Sk̓wx̓wú7mesh Úxwumixw village known as Swiyát. Swiyát and Nexwnéwu7ts Átlk'a7tsem (Howe Sound) are tied to the cultural well-being of Sk̓wx̓wú7mesh Úxwumixw members, their ancestors, and their descendants, and to other First Nations. Woodfibre LNG seeks to develop, construct and operate the Project in a manner that is respectful of Indigenous values. This involves undertaking meaningful and robust Project consultation with Indigenous Groups, to reflect their unique environmental, cultural, economic and social priorities. Through consultation, Woodfibre LNG aims to advance reconciliation and integrate Indigenous knowledge into environmental management and socioeconomic Project-related mitigations. Woodfibre LNG seeks to work with Indigenous Groups to determine tailored, mutually agreeable approaches and timelines for consultation on regulatory authorizations, including FDS conditions. This involves ongoing opportunities for discussions, through established working groups, committees and other forums, and review of documents by Indigenous Groups. Through these processes, Woodfibre LNG aims to demonstrate commitment to the ongoing relationship and partnership with Indigenous Groups, and compliance with consultative and other regulatory requirements under the FDS.

#### 6.1.1 Management Plans

As communicated in the Woodfibre LNG annual reports from 2020 through 2024, consultation with Indigenous Groups occurred across a range of different aspects related to the Project, and as required by the FDS conditions. This included consultation on the following Plans: Community Services and Infrastructure Management Plan (CSIMP), Marine Transportation Management and Monitoring Plan for Construction, Marine Fish and Fish Habitat Management and Monitoring Plan, Traffic Management Plan, Water Management Plan – Construction, Construction Environmental Management Plan, and Emergency Response Plan (FDS Condition 11.3). Consultation relates to revisions to the plans, which were minor and non-material. Each management plan underwent a formal review and consultation process that involved input from various parties, including Indigenous Groups. Consultation involved some or all of the following activities depending on the requirements and needs:

- Review of and written comment on draft management plans.
- Bilateral and group discussions of draft management plans and mitigations.
- Open houses, community roundtables, information sessions with Indigenous Groups, community stakeholders, and members of the public, on various elements of the Project including mitigations and management plans; and
- Recording of all questions, issues, concerns and other feedback and Woodfibre LNG's responses into Records of Engagement.

### 6.1.2 Proposed Changes

In June 2025, Woodfibre LNG notified IAAC of proposed changes to the Project pursuant to Condition 2.10 for the installation and operation of Floatel #2 and associated facilities. The amendment was approved on 06 November 2025. To satisfy Condition 2.11, Woodfibre LNG provided IAAC an analysis of the adverse environmental effects of the changes and the results of consultation with the following Indigenous Groups: Sk̓wx̓wú7mesh Úxwumixw (Squamish Nation), Tseil-Waututh Nation, Musqueam Indian Band, Cowichan Tribes First Nation, Halalt First Nation, Lake Cowichan First Nation, Lyackson First Nation, Penelakut Tribe, Stz'uminus First Nation, Lake Cowichan First Nation, and Métis Nation of British Columbia.

## 6.2 Stakeholder Engagement

Pursuant to FDS Condition 2.6.3, this section summarizes how views and information received through stakeholder engagement activities were provided full and impartial consideration by Woodfibre LNG in 2025 related to FDS conditions. Engagement activities will be ongoing for the life of the Project and will continue to be tailored to the phase of the Project and associated activities planned at the time of engagement.

In 2025, Woodfibre LNG undertook stakeholder engagement with government agencies and community groups on Management Plans identified in Section 6.1.2.

Woodfibre LNG also undertook engagement through several advisory and technical committees – with representation from Indigenous Groups, all levels of government, service providers, and community groups. These committees provide input and feedback on mitigations identified in Management Plans, discuss ongoing monitoring efforts, review reporting metrics and participate in issues resolution.

### 6.2.1 Marine User Group

The Woodfibre LNG Marine Users Group (MUG) is a strategic-level advisory group, comprised of Indigenous Groups, government agencies, and marine users operating in Nexwnéwu7ts Átlk'a7tsem (Howe Sound). The MUG is a commitment in the Marine Transportation Management and Monitoring Plan for Construction, and was established in Fall 2023, in support of safe, transparent and inclusive management of marine activities related to the Project. The purpose of the MUG is to share information with marine users, ensure they are aware of, and prepared for, Construction activities that may affect marine transportation, discuss any areas of concern, and determine strategies to limit disruption to marine users resulting from Construction activities. The MUG first met in October 2023 and continued on a quarterly basis through the first year of Construction, with frequency transitioning to a bi-annual (twice per year) cadence in 2025, as agreed with MUG membership and outlined in the Terms of Reference.

## 6.2.2 Fisheries Technical Advisory Committee

Skw̓wú7mesh Úxwumixw and Woodfibre LNG established a long-term Fisheries Technical Advisory Committee (FTAC) in Fall 2024 to guide the development of the fisheries related monitoring programs and oversee the implementation of the Project's Fish and Fish Habitat Management and Monitoring Plan (FFHMMP), including the associated FAA requirements.

The primary objectives for the FTAC are to provide:

- Technical oversight to the development and implementation of a robust and long-term fish and fish habitat monitoring program; and
- Sound evidence of effective mitigation and improved habitat conditions within the CPA relative to pre-Project conditions, thereby verifying an over-arching objective shared by Skw̓wú7mesh Úxwumixw and Woodfibre LNG.

The FTAC also functions as the primary review mechanism for Construction phase monitoring information and reporting, which includes recommendations pertaining to adaptive management. The adaptive management of monitoring protocols (e.g., survey methodologies), reporting requirements, and specific mitigation measures are expected to be informed by on-going monitoring data collection, with reviews and recommendations provided by the FTAC. The FTAC jointly produces an annual report on fish and fish habitat monitoring results and outcomes. The 2025 Marine Fish and Fish Habitat Environmental Effects Annual Monitoring Report, once finalized, will be available on Woodfibre LNGs website under [Regulatory Filings](#).

The FTAC first met in October 2024 and continues to meet several times a year.

## 6.2.3 Marine Mammal Monitoring Program and Working Group

Woodfibre LNG and Skw̓wú7mesh Úxwumixw (Squamish Nation) worked collaboratively to establish a Marine Mammal Monitoring Program in Fall 2023. A Marine Mammal Monitoring Working Group has remained in place since 2023 to review data and discuss future implementation actions for the Program. The Working Group is made up of subject matter experts who meet regularly to provide technical guidance on the development and execution of hydro-acoustic monitoring and the Marine Mammal Monitoring Program. The working group reviews detailed MMO data alongside underwater noise data continuously collected from several hydrophones distributed throughout the Project area. The Marine Mammal Monitoring Program provides clear parameters to protect wildlife and ensures direct participation of Skw̓wú7mesh Úxwumixw (Squamish Nation) and the opportunity to share lessons learned and support adaptative management for the future.

Mitigation measures have been successfully implemented to avoid adverse effects to marine mammals and their habitat, including:

- Work stoppages as a result of detection of marine mammal species within established exclusion zones prior to and during works.
- Measures to reduce underwater noise, real-time continuous underwater noise data collection and logging.
- Use of an online Artificial Intelligence tool to help identify resident seals and potential patterns in behaviours.
- Establishment of sea-vessel routes and speeds; and

- Protocols for sea-vessel interaction with marine mammals.

Regular meetings provide a collaborative space for broad oversight to the on-going implementation and adaptation of the Marine Mammal Monitoring Program, coupled with joint field audit trips by Sk̓wx̓wú7mesh Úxwumixw (Squamish Nation) and Subject Matter Expert working with the Site's QP onsite during implementation to ensure program expectations are being met. The two seasons thus far of marine construction have concluded with a technical workshop of Working Group members to review learnings to date and apply those to next season's Marine Mammal Monitoring Program as part of a continuous improvement process.

The Working Group first met November 2023 and has met regularly to review monitoring methodology, hydroacoustic and observational data, and adaptive management recommendations, during the in-water Construction seasons.

#### 6.2.4 Community Services and Infrastructure Management Plan Quarterly Meeting

During Construction, and until two years after the completion of Construction, quarterly CSIMP meetings are held in-person and virtually with Indigenous Groups, local governments and regional districts, and provincial government infrastructure and local service providers. The purpose of these meetings is to review and discuss quarterly reporting metrics and determine to the extent to which mitigations are effective or require adjustments to avoid socioeconomic impacts. Meetings are by invitation only and include the Indigenous Groups and stakeholders who were engaged and consulted during development of the CSIMP.

## 7.0 CLOSURE

This report has been prepared in fulfillment of the conditions set out in the FDS (as amended November 2025) issued to Woodfibre LNG for the Woodfibre LNG Project.

Appendix A  
Federal Decision Statement Table of Concordance for the  
Woodfibre LNG Project (2025 Update)

Condition No.	Condition	Notes
2.1	The Proponent shall, throughout all phases of the Designated Project, ensure that its actions in meeting the conditions set out in this Decision Statement are considered in a careful and precautionary manner, promote sustainable development, are informed by the best available information and knowledge, including community and Aboriginal traditional knowledge, are based on validated methods and models, are undertaken by qualified individuals, and have applied the best available economically and technologically feasible mitigation measures.	<ul style="list-style-type: none"> <li>Refer to the Federal Decision Statement Annual Report for 2025 for additional information.</li> </ul>
2.2	<p>The Proponent shall, where consultation is a requirement of a condition set out in this Decision Statement:</p> <ul style="list-style-type: none"> <li>2.2.1 provide a written notice of the opportunity for the party or parties being consulted to present their views and information on the subject of the consultation;</li> <li>2.2.2 provide sufficient information and a reasonable period of time to permit the party or parties being consulted to prepare their views and information;</li> <li>2.2.3 provide a full and impartial consideration of any views and information presented by the party or parties being consulted; and</li> <li>2.2.4 advise the party or parties that have provided comments on how the views and information received have been considered by the Proponent.</li> </ul>	<ul style="list-style-type: none"> <li>Refer to Section 6 [Consultation and Engagement] of the attached report for additional information.</li> </ul>
2.3	The Proponent shall, where consultation with Aboriginal groups is a requirement of a condition set out in this Decision Statement, and prior to initiating that consultation, communicate with each Aboriginal group to determine the manner by which to satisfy the consultation requirements referred to in Condition 2.2, including methods of notification, the type of information and the period of time to be provided when seeking input, the process for full and impartial consideration of any views and information presented and the means by which each Aboriginal group will be informed of how the views and information received have been considered by the Proponent.	<ul style="list-style-type: none"> <li>Refer to Section 6 [Consultation and Engagement] of the attached report for additional information.</li> </ul>
2.4	<p>The Proponent shall, where a follow-up program is a requirement of a condition set out in this Decision Statement:</p> <ul style="list-style-type: none"> <li>2.4.1 undertake monitoring and analysis to verify the accuracy of the environmental assessment as it pertains to the particular condition and/or to determine the effectiveness of any mitigation measure(s);</li> <li>2.4.2 determine whether additional mitigation measures are required based on the monitoring and analysis undertaken pursuant to condition 2.4.1; and</li> <li>2.4.3 if additional mitigation measures are required pursuant to condition 2.4.2, implement the additional mitigation measures and monitor them pursuant to condition 2.4.1.</li> </ul>	<ul style="list-style-type: none"> <li>Refer to Section 3 [Follow-Up Monitoring] of the attached report for more information. Further, refer to Section 3.6 [Listed Species at Risk] and Section 4 [Additional Mitigation Measures] of the attached report for additional information.</li> </ul>
2.5	Where consultation with Aboriginal groups is a requirement of a follow-up program, the Proponent shall discuss with each Aboriginal group opportunities for the participation of that Aboriginal group in the implementation of the follow-up program as set out in condition 2.4.	<ul style="list-style-type: none"> <li>Refer to Section 6 [Consultation and Engagement] of the attached report for additional information.</li> </ul>
2.6	<p>The Proponent shall, commencing in the reporting year that implementation of the conditions set out in this Decision Statement begins, prepare an annual report that sets out:</p> <ul style="list-style-type: none"> <li>2.6.1 the activities undertaken in the reporting year to comply with each of the conditions set out in this Decision Statement;</li> <li>2.6.2 how the Proponent complied with condition 2.1;</li> <li>2.6.3 for conditions set out in this Decision Statement for which consultation is a requirement, how the Proponent considered any views and information that the Proponent received during or as a result of the consultation;</li> <li>2.6.4 the results of the follow-up program requirements identified in conditions 3.14, 4.3, 6.5, 7.2 and 9.3; and</li> <li>2.6.5 any additional mitigation measures implemented or proposed to be implemented by the Proponent, as determined under condition 2.4.</li> </ul>	<ul style="list-style-type: none"> <li>This report has been structured consistent with the requirements of this condition and includes, as appropriate, the information requirements described by Conditions 2.61 – 2.6.5.</li> </ul>
2.7	The Proponent shall submit to the Agency the annual report referred to in Condition 2.6, including an executive summary in both official languages, no later than March 31 following the reporting year to which the annual report applies.	<ul style="list-style-type: none"> <li>As per the attached Project Federal Decision Statement Annual Report for 2025.</li> </ul>

Condition No.	Condition	Notes
2.8	The Proponent shall publish on the Internet, or any medium which is widely publicly available, the annual report and the executive summaries referred to in Conditions 2.6 and 2.7, any plan(s) to offset the loss of fish and fish habitat referred to in Condition 3.11, the archaeological and heritage resources management plan referred to in Condition 8.1, the decommissioning plan referred to in Condition 10.1, the annual report referred to in Condition 10.3, the reports referred to in Conditions 11.4.3 and 11.4.4, the Communication Plan referred to in Condition 11.5, the implementation schedule referred to in Condition 12.1 and any update(s) or revision(s) to the above documents, upon submission of these documents to the parties referenced in the respective Conditions. The Proponent shall keep these documents publicly available for 25 years following the end of operation or until the end of decommissioning of the Designated Project, whichever comes first. The Proponent shall notify the Agency and Aboriginal groups of the availability of these documents once they are published.	<ul style="list-style-type: none"> <li>• Relevant reports have been posted to the Woodfibre LNG web portal at <a href="https://woodfibrelng.ca/">https://woodfibrelng.ca/</a></li> <li>• The following documents were published online in 2025: <ul style="list-style-type: none"> <li>○ Federal Decision Statement Annual Report for 2024 (including executive summaries)</li> </ul> </li> </ul> <p>An update to the implementation schedule will be submitted to IAAC in 2026 in compliance with Condition 12.2. Pursuant to FDS Condition 7.4, the updated Implementation Schedule will be sent to Indigenous Groups defined in Section 1.1 of the FDS and will be posted on the Woodfibre LNG website pursuant to FDS Condition 2.8.</p>
2.9	The Proponent shall notify the Agency and Aboriginal groups in writing no later than 60 days after the day on which there is a transfer of ownership, care, control or management of the Designated Project in whole or in part.	<ul style="list-style-type: none"> <li>• Ongoing consultation with Indigenous groups has occurred since summer 2022.</li> </ul>
2.10	The Proponent shall consult with Aboriginal groups prior to initiating any material change(s) to the Designated Project that may result in adverse environmental effects, and shall notify the Agency in writing no later than 60 days prior to initiating the change(s).	<ul style="list-style-type: none"> <li>• June 2025, Woodfibre LNG notified IAAC of proposed changes to the Project pursuant to Condition 2.10 for the installation and operation of a second floatel and associated facilities. The amendment was approved 04 November 2025.</li> </ul>
2.11	In notifying the Agency pursuant to condition 2.10, the Proponent shall provide the Agency with an analysis of the adverse environmental effects of the change(s) to the Designated Project, as well as the results of the consultation with Aboriginal groups.	<ul style="list-style-type: none"> <li>• Refer to Section 6.1 [Indigenous Consultation] of the attached report for more information.</li> </ul>
3.1	The Proponent shall conduct in-water construction activities during timing windows of least risk for the area, unless otherwise agreed to by relevant federal and provincial authorities. If in-water construction activities cannot be conducted during timing windows of least risk, the Proponent shall develop and implement additional mitigation measures, in consultation with Fisheries and Oceans Canada and Aboriginal groups, to protect fish during sensitive life stages.	<ul style="list-style-type: none"> <li>• Refer to Section 3.1 [Fish and Fish Habitat] of the attached report for more information.</li> </ul>
3.2.1	<p>The Proponent shall implement measures to mitigate adverse environmental effects of the Designated Project on fish and fish habitat from changes to water quality during all phases of the Designated Project. The mitigation measures shall include:</p> <ul style="list-style-type: none"> <li>• 3.2.1 implementing erosion control measures and sediment control measures during all phases of the Designated Project;</li> <li>• 3.2.2 revegetating disturbed riparian areas, using native plant species, after construction;</li> <li>• 3.2.3 using silt control measures around in-water construction activities; and</li> <li>• 3.2.4 preventing wet concrete or cement-laden water from entering the marine environment.</li> </ul>	<ul style="list-style-type: none"> <li>• Refer to Section 3.1 [Fish and Fish Habitat] of the attached report for more information.</li> </ul>
3.3	<p>The Proponent shall implement measures to mitigate adverse environmental effects of the Designated Project on fish, including mortality, physical injury and behavioral change, during all phases of the Designated Project. The mitigation measures shall include:</p> <ul style="list-style-type: none"> <li>• 3.3.1 isolating instream construction activities in Mill Creek from adjacent streamflow;</li> <li>• 3.3.2 salvaging and relocating fish during instream construction activities requiring isolation of freshwater fish habitat in Mill Creek;</li> <li>• 3.3.3 maintaining minimum flow in Mill Creek and Woodfibre Creek to support fish and fish habitat;</li> <li>• 3.3.4 designing, installing and operating a water intake structure to avoid or reduce the risk of injury and mortality to fish in Mill Creek and Woodfibre Creek;</li> <li>• 3.3.5 taking into consideration the British Columbia Marine and Pile Driving Contractors Association's Best Management Practices for Pile Driving and Related Operations when conducting pile installation; and</li> <li>• 3.3.6 implementing low-noise methods or sound dampening technologies to reduce the intensity of the sound generated or the level of sound propagation through the water column if underwater pressure pulse levels exceed 30 kilopascals during pile installation.</li> </ul>	<ul style="list-style-type: none"> <li>• Refer to Section 3.1 [Fish and Fish Habitat] of the attached report for more information.</li> </ul>

Condition No.	Condition	Notes
3.4	The Proponent shall prevent or avoid the destruction of fish, or any potentially harmful effects to fish habitat, during all phases of the Designated Project when using explosives in or around water frequented by fish.	<ul style="list-style-type: none"> <li>Refer to Section 3.1 [Fish and Fish Habitat] of the attached report for more information.</li> </ul>
3.5	The Proponent shall remove existing creosote-treated piles in a manner to prevent the mobilization of deleterious substances in water frequented by fish, and taking into consideration navigational safety.	<ul style="list-style-type: none"> <li>Refer to Section 3.1 [Fish and Fish Habitat] of the attached report for more information.</li> </ul>
3.6	The Proponent shall design, install and operate any marine water intake to avoid or reduce the incidental capture of fish through entrainment and impingement, including the risk of entrainment of Pacific herring ( <i>Clupea pallasii</i> ) larvae.	<ul style="list-style-type: none"> <li>Not applicable to the 2025 reporting period.</li> </ul>
3.7	The Proponent shall design, install and operate any marine discharge diffuser to prevent the deposit of a deleterious substance in water frequented by fish.	<ul style="list-style-type: none"> <li>Refer to Section 3.1 [Fish and Fish Habitat] of the attached report for more information.</li> </ul>
3.8	<p>The Proponent shall establish and maintain a marine mammal underwater noise impact areas for all construction activities to avoid adverse behavioural change in or injury to marine mammals. In doing so, the Proponent shall:</p> <ul style="list-style-type: none"> <li>3.8.1 identify each construction activity that generates underwater noise levels greater than 160 decibels and 190 decibels at a reference pressure of one micropascal and the periods of time when each activity occurs;</li> <li>3.8.2 for all marine mammals except pinnipeds, establish the boundary of the marine mammal underwater noise impact area for each construction activity identified in condition 3.8.1 at the distance from the activity at which the underwater noise level is predicted to reach 160 decibels;</li> <li>3.8.3 for pinnipeds, establish the boundary of the marine mammal underwater noise impact area for each construction activity identified in condition 3.8.1 at the distance from the activity where underwater noise levels reach 190 decibels or at a distance of 150 metres, whichever is the greater distance;</li> <li>3.8.4 employ a marine mammal observer, who is a qualified individual, and require that person to detect and report the presence of marine mammals in the marine mammal underwater noise impact areas identified in conditions 3.8.2 and 3.8.3 during construction activities identified in condition 3.8.1;</li> <li>3.8.5 stop or not start the construction activities identified in condition 3.8.1 if marine mammal(s) area detected in their respective marine mammal underwater noise impact area identified in condition 3.8.2 or condition 3.8.3, and only begin or continue the construction activities identified in condition 3.8.1 once the marine mammal(s) has moved out of their respective marine mammal underwater noise impact area; and</li> <li>3.8.6 implement mitigation measures, including sound dampening technology such as bubble curtains and soft-start procedures, to reduce construction noise levels in the marine mammal underwater noise impact areas identified in conditions 3.8.2 and 3.8.3.</li> <li>3.8.7 monitor continuously the levels of underwater noise at the boundaries of both marine mammal underwater noise impact areas while the construction activities identified in condition 3.8.1 are ongoing. The Proponent shall immediately halt the construction activities if hydroacoustic monitoring indicates that noise levels at either boundary exceed their respective threshold, and not resume without implementing sound attenuation measure(s), which could include increasing the distance of the underwater noise impact areas, to reduce noise levels below the thresholds.</li> </ul>	<ul style="list-style-type: none"> <li>Refer to Section 3.1 [Fish and Fish Habitat] of the attached report for more information.</li> </ul>
3.9	The Proponent shall require that LNG vessels associated with the Designated Project respect speed profiles applicable to the operation of the Designated Project, subject to navigational safety, to prevent or reduce the risks of collisions between LNG vessels and marine mammals.	<ul style="list-style-type: none"> <li>Not applicable to the 2025 reporting period.</li> </ul>
3.10	The Proponent shall require that LNG vessels and tug operators associated with the Designated Project report collisions with marine mammals in Howe Sound to the Canadian Coast Guard within two hours of a collision occurrence, and notify Aboriginal groups in writing.	<ul style="list-style-type: none"> <li>Not applicable to the 2025 reporting period.</li> </ul>
3.11	The Proponent shall, in consultation with Fisheries and Oceans Canada and Aboriginal groups, develop and implement any plan(s) required to offset the loss of fish and fish habitat associated with the carrying out of the Designated Project.	<ul style="list-style-type: none"> <li>Refer to Section 5.0 [Offsetting] of the attached report for more information.</li> </ul>

Condition No.	Condition	Notes
3.12	<p>For any fish habitat offset areas proposed in any offsetting plan(s) under condition 3.11, and prior to submitting the offsetting plan to Fisheries and Oceans Canada, the Proponent shall determine whether there are adverse effects:</p> <ul style="list-style-type: none"> <li>• 3.12.1 on migratory birds and their habitats;</li> <li>• 3.12.2 on terrestrial species, including amphibians and reptiles, and their habitats;</li> <li>• 3.12.3 on listed species at risk and their habitats;</li> <li>• 3.12.4 on the current use of lands and resources for traditional purposes by Aboriginal peoples;</li> <li>• 3.12.5 on the flow rates, water depths or water widths that may affect the passage of a vessel, including a vessel used by Aboriginal peoples in the context of their current use of lands and resources for traditional purposes;</li> <li>• 3.12.6 on physical and cultural heritage and structure, site or thing that is of historical, archaeological, paleontological or architectural significance to Aboriginal peoples; and</li> <li>• 3.12.7 from potential sources of contamination including polycyclic aromatic hydrocarbons, dioxins, furans, copper, lead, zinc, tri-n-butyltin, arsenic, cadmium and methyl-mercury in the receiving environment.</li> </ul>	<ul style="list-style-type: none"> <li>• Not applicable to the 2025 reporting period.</li> </ul>
3.13	The Proponent shall, if there are adverse effects on any of the elements set out in conditions 3.12.1 to 3.12.7, avoid or lessen those adverse effects.	<ul style="list-style-type: none"> <li>• Not applicable to the 2025 reporting period.</li> </ul>
3.14	The Proponent shall, in consultation with Fisheries and Oceans Canada and Aboriginal groups, develop, prior to construction, and implement, during all phases of the Designated Project, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of the mitigation measures identified under Conditions 3.1 to 3.10.	<ul style="list-style-type: none"> <li>• Refer to Section 3.1 [Fish and Fish Habitat] and Section 6 [Consultation and Engagement] of the attached report for more information.</li> </ul>
4.1	The Proponent shall carry out all phases of the Designated Project in a manner that protects migratory birds and avoids harming, killing or disturbing migratory birds or destroying, disturbing or taking their nests or eggs. In this regard, the Proponent shall take into account Environment and Climate Change Canada's Avoidance Guidelines. The Proponent's actions in applying the Avoidance Guidelines shall be in compliance with the <i>Migratory Birds Convention Act, 1994</i> and with the <i>Species at Risk Act</i> .	<ul style="list-style-type: none"> <li>• Refer to Section 3.2 [Migratory Birds] of the attached report for additional information.</li> </ul>
4.2	<p>The Proponent shall:</p> <ul style="list-style-type: none"> <li>• 4.2.1 restrict flaring to the minimum required during operation, maintenance activities or emergencies to prevent the accumulation of natural gas and protect from overpressure;</li> <li>• 4.2.2 minimize flaring required for operation and maintenance activities during night time and during periods of migratory bird vulnerability; and</li> <li>• 4.2.3 control operational lighting to avoid attracting migratory birds.</li> </ul>	<ul style="list-style-type: none"> <li>• Not applicable to the 2025 reporting period.</li> </ul>
4.3	The Proponent shall develop, prior to construction and in consultation with Aboriginal groups, and implement, during all phases of the Designated Project, a follow-up program to verify the accuracy of the environmental assessment as it pertains to the environmental effects of the air cooling system on migratory birds and to determine the effectiveness of the mitigation measures used to avoid harm to migratory birds, their eggs and nests, including the measures used to comply with conditions 4.1 and 4.2.	<ul style="list-style-type: none"> <li>• Refer to Section 3.2 [Migratory Birds] and Section 6 [Consultation and Engagement] of the attached report for additional information.</li> </ul>
5.1	[Modified and moved to Condition 6.1.4, <i>Budget Implementation Act, 2024</i> ]	<ul style="list-style-type: none"> <li>• Not applicable.</li> </ul>
5.2	[Removed, <i>Budget Implementation Act, 2024</i> ]	<ul style="list-style-type: none"> <li>• Not applicable.</li> </ul>

Condition No.	Condition	Notes
6.1	<p>The Proponent shall implement noise and air emission reduction measures during all phases of the Designated Project to avoid or reduce adverse environmental effects on human health, including:</p> <ul style="list-style-type: none"> <li>• 6.1.1 complying with the Waste Discharge Regulation under British Columbia's <i>Environmental Management Act</i> for air emissions;</li> <li>• 6.1.2 following best management practices and guidance from the British Columbia Oil and Gas Commission's Noise Control Best Practices Guidelines; and</li> <li>• 6.1.3 complying with the operational noise requirement of the British Columbia Oil and Gas Commission's Liquefied Natural Gas Facility Regulation.</li> <li>• 6.1.4 utilize electric drives during operation for the compression of natural gas or utilize other technology that would result in equivalent or reduced emissions of air contaminants</li> </ul>	<ul style="list-style-type: none"> <li>• Refer to Section 3.3 [Human Health] of the attached report for additional information.</li> </ul>
6.2	<p>The Proponent shall, in consultation with Aboriginal groups and other parties who may be adversely affected by the noise caused by the Designated Project, develop, prior to construction, and implement, during all phases of the Designated Project, a mechanism for receiving noise complaints associated with the Designated Project. The Proponent shall respond in a timely manner to any noise complaint(s) received.</p>	<ul style="list-style-type: none"> <li>• Contact information is available on the Woodfibre LNG website at <a href="https://woodfibrelng.ca/">https://woodfibrelng.ca/</a>. Refer to Section 3.3 [Human Health] of the attached report for additional information.</li> <li>• Refer to Section 6.0 [Consultation and Engagement] of the attached report for additional information.</li> </ul>
6.3	<p>The Proponent shall install and manage exterior lighting from all components of the Designated Project and during all phases of the Designated Project to prevent excessive emanation of light, by following the International Commission on Illumination's CIE 150:2003 Guide on the limitation of the Effects of Obtrusive light from Outdoor lighting Installations, while meeting marine transportation and aviation safety requirements.</p>	<ul style="list-style-type: none"> <li>• Refer to Section 3.3 [Human Health] of the attached report for additional information.</li> </ul>
6.4	<p>The Proponent shall monitor, during construction and operation, water quality and sediment, using as a benchmark the Canadian Council of Ministers of the Environment's <i>Water Quality Guidelines for the Protection of Aquatic Life and Interim Sediment Quality Guidelines for the Protection of Aquatic Life</i>, and shall communicate any exceedance(s) of the Guidelines attributable to the Designated Project to relevant government authorities and Aboriginal groups, and implement additional mitigation measures to remedy those exceedances.</p>	<ul style="list-style-type: none"> <li>• Refer to Section 3.3 [Human Health], Section 4 [Additional Mitigation Measures] and Section 6 [Consultation and Engagement] of the attached report for additional information.</li> </ul>
6.5	<p>The Proponent shall, in consultation with Aboriginal groups and relevant health authorities, develop, prior to construction, and implement a follow-up program to verify the assessment predictions regarding the bioavailability and bioaccumulation of contaminants in fish consumed by humans. The follow-up program shall include:</p> <ul style="list-style-type: none"> <li>• 6.5.1 prior to the commencement of marine in-water construction activities, establishing baseline conditions in the tissue of shellfish and groundfish for polycyclic aromatic hydrocarbons, polychlorinated dibenzo-p-dioxins and furans, copper, lead, zinc, tributyltin, arsenic, cadmium and methylmercury and using this information to update the human health risk assessment for the consumption of shellfish and groundfish;</li> <li>• 6.5.2 during marine in-water construction activities, monitoring the re-suspension and bioavailability of polycyclic aromatic hydrocarbons, dioxins, furans, copper, lead, zinc, tri-n-butyltin, arsenic, cadmium and methyl-mercury in the tissue of shellfish and groundfish; and</li> <li>• 6.5.3 if a potential for human health risk is identified in the updated human health risk assessment for the consumption of shellfish and groundfish referred in condition 6.5.1 or through monitoring referred in condition 6.5.2, conducting additional sampling of polycyclic aromatic hydrocarbons, dioxins, furans, copper, lead, zinc, tri-n-butyltin, arsenic, cadmium and methyl-mercury in the tissue of shellfish and groundfish to confirm the assessment predictions regarding the bioavailability and bioaccumulation of contaminants in fish consumed by humans. If required, additional sampling shall start immediately upon completion of marine in-water construction activities and continue for one year following completion of marine in-water construction activities.</li> </ul> <p>The Proponent shall communicate the results of the follow-up program, including the results of any additional sampling, to Aboriginal groups.</p>	<ul style="list-style-type: none"> <li>• Refer to Section 3.3 [Human Health] of the attached report for additional information</li> </ul>

Condition No.	Condition	Notes
7.1	<p>The Proponent shall, in consultation with Aboriginal groups and other marine users, develop, prior to construction, and implement, during all phases of the Designated Project, a communication protocol related to marine transportation. The communication protocol shall include procedures and practices for sharing information between the Proponent and Aboriginal groups and other marine users on the following:</p> <ul style="list-style-type: none"> <li>• 7.1.1 location and timing of construction activities associated with the Designated Project-related, location and timing of ferry and water taxi traffic associated with the Designated Project and location of the marine access route to be used by LNG vessels associated with the Designated Project in Howe Sound;</li> <li>• 7.1.2 location and timing of traditional activities by Aboriginal groups and of activities by other marine users;</li> <li>• 7.1.3 Designated Project-related safety procedures, such as navigation aids, updated navigational charts and use of escort tugboats;</li> <li>• 7.1.4 areas where navigation may be controlled for safety reasons;</li> <li>• 7.1.5 speed profiles and schedules applicable to the operation of LNG vessels associated with the Designated Project; and</li> <li>• 7.1.6 ways in which Aboriginal groups and other marine users can provide feedback to the Proponent about adverse environmental effects related to navigation caused by activities associated with the Designated Project, including construction activities and the operation of ferry and water taxi and LNG vessels.</li> </ul>	<ul style="list-style-type: none"> <li>• Refer to Section 3.4 [Land Use] and Section 6 [Consultation and Engagement] of the attached report for additional information.</li> </ul>
7.2	<p>The Proponent shall, in consultation with Aboriginal groups, develop, prior to construction, and implement, during the construction and operation phases of the Designated Project, a follow-up program to verify the accuracy of the predictions made during the environmental assessment in relation to the effects of the wake generated by Designated Project-related vessels on the current use of lands and resources for traditional purposes and on physical and cultural heritage and structures, sites or things of historical, archaeological, paleontological or architectural significance. The follow-up program shall include:</p> <ul style="list-style-type: none"> <li>• 7.2.1 monitoring during the construction period and the first two years of operation of the degree of wake generated by Designated Project-related vessels and of adverse environmental effects on harvesters caused by vessel wake attributable to Designated Project-related vessels at key harvest sites and during key harvest periods for Aboriginal groups and on physical and cultural heritage and structures, sites or things of historical, archaeological, paleontological or architectural significance located on or near the shoreline and identified in consultation with Aboriginal groups; and</li> <li>• 7.2.2 providing the results of the follow-up program and details of any additional mitigation measures implemented as a result of the follow-up program to Aboriginal groups.</li> </ul>	<ul style="list-style-type: none"> <li>• Refer to Section 3.4 [Land Use] and Section 6 [Consultation and Engagement] of the attached report for additional information.</li> </ul>
7.3	<p>The Proponent shall, prior to construction, consult with Aboriginal groups to seek opportunities for marine and land access around the Project area for Aboriginal groups to practice their current use of land and resources for traditional purposes and to pursue socioeconomic opportunities, subject to safety requirements in the Project area.</p>	<ul style="list-style-type: none"> <li>• Refer to Section 3.4 [Land Use] and Section 6 [Consultation and Engagement] of the attached report for additional information.</li> </ul>
7.4	<p>The Proponent shall provide Aboriginal groups with the implementation schedule and any update(s) or revision(s) to that schedule as stated in condition 12 at the same time the Proponent provides the schedule to the Agency.</p>	<ul style="list-style-type: none"> <li>• Refer to Section 2.2 [Implementation Schedule] of the attached report for additional information.</li> </ul>

Condition No.	Condition	Notes
8.1	<p>The Proponent shall, in consultation with Aboriginal groups, develop, prior to construction, and implement, during all phase of the Designated Project, an archaeological and heritage resources management plan for the Designated Project. The archaeological and heritage resources management plan shall take into account the British Columbia's Handbook for the Identification and Recording of Culturally Modified Trees. The archaeological and heritage resources management plan shall include:</p> <ul style="list-style-type: none"> <li>• 8.1.1 a description of structures, sites or things of historical, archaeological, paleontological or architectural significance (including culturally modified trees) that may be encountered by the Proponent during construction;</li> <li>• 8.1.2 procedures and practices for on-site monitoring of construction activities that may affect a structure, site or thing of historical, archaeological, paleontological or architectural significance (including culturally modified trees) and for the identification and removal of that structure, site or thing; and</li> <li>• 8.1.3 a chance find protocol, should a previously unidentified structure, site or thing of historical, archaeological, paleontological or architectural significance (including culturally modified trees) be discovered by the Proponent or brought to the attention of the Proponent, during construction, by an Aboriginal group or another party.</li> </ul>	<ul style="list-style-type: none"> <li>• Refer to Section 3.5 [Archaeological and Heritage Resources] and Section 6.0 [Consultation and Engagement] of the attached report for additional information.</li> </ul>
9.1	<p>The Proponent shall conduct pre-clearing surveys to determine the distribution of little brown myotis (<i>Myotis lucifugus</i>), and establish, in consultation with relevant government authorities, buffer zones around active hibernacula and active roosts.</p>	<ul style="list-style-type: none"> <li>• Refer to Section 3.6 [Listed Species at Risk] of the attached report for additional information.</li> </ul>
9.2	<p>The Proponent shall, prior to construction and throughout all phases of the Designated Project, install and maintain roosting structures to offset any loss of little brown myotis (<i>Myotis lucifugus</i>) roosting habitat.</p>	<ul style="list-style-type: none"> <li>• Refer to Section 3.6 [Listed Species at Risk] of the attached report for additional information.</li> </ul>
9.3	<p>The Proponent shall develop and implement a follow-up program to monitor the little brown myotis (<i>Myotis lucifugus</i>) usage of buffer zones and roosting structures to determine the effectiveness of the mitigation measures throughout all phases of the Designated Project and to verify the accuracy of the environmental assessment as it pertains to the environmental effects of the air cooling system on little brown myotis (<i>Myotis lucifugus</i>).</p>	<ul style="list-style-type: none"> <li>• Refer to Section 3.6 [Listed Species at Risk] of the attached report for additional information.</li> </ul>
10.1	<p>At least one year prior to the end of operation, the Proponent shall develop, in consultation with Aboriginal groups and relevant government authorities, and submit to the Agency a decommissioning plan. The decommissioning plan shall include a description of:</p> <ul style="list-style-type: none"> <li>• 10.1.1 any consultation undertaken by the Proponent during the development of the decommissioning plan, including any issues raised by Aboriginal groups and other parties during consultation and how these issues were addressed by the Proponent;</li> <li>• 10.1.2 the components of the Designated Project that will be decommissioned by the Proponent and the components that will not be decommissioned;</li> <li>• 10.1.3 the desired end-state objectives of the Project area;</li> <li>• 10.1.4 the components of the environment that may be adversely affected by decommissioning activities or by components of the Designated Project that will not be decommissioned;</li> <li>• 10.1.5 how the Proponent will mitigate and monitor adverse environmental effects from decommissioning activities;</li> <li>• 10.1.6 how the Proponent will conduct in-water and land-based decommissioning activities (including the location, the scheduling and sequencing of activities);</li> <li>• 10.1.7 the plan for progressive reclamation, if appropriate; and</li> <li>• 10.1.8 the manner and timing of consultation of Aboriginal groups and other relevant parties throughout the decommissioning phase.</li> </ul>	<ul style="list-style-type: none"> <li>• Not applicable to the 2025 reporting period.</li> </ul>
10.2	<p>The Proponent shall implement the decommissioning plan referred in condition 10.1.</p>	<ul style="list-style-type: none"> <li>• Not applicable to the 2025 reporting period.</li> </ul>

Condition No.	Condition	Notes
10.3	<p>The Proponent shall, from the reporting year in which decommissioning begins until the end of the decommissioning phase or for a maximum of 25 years, submit to the Agency a written annual report no later than March 31 of the following reporting year. The written annual report shall include a description of:</p> <ul style="list-style-type: none"> <li>• 10.3.1 the decommissioning activities undertaken by the Proponent during the reporting year;</li> <li>• 10.3.2 any adverse environmental effects identified by the Proponent with respect to the decommissioning activities identified in condition 10.3.1;</li> <li>• 10.3.3 a description of the mitigation measures that were implemented by the Proponent to mitigate the adverse environmental effects identified in condition 10.3.2 and the results of any associated monitoring;</li> <li>• 10.3.4 any modifications made to the decommissioning plan referred in condition 10.1; and</li> <li>• 10.3.5 consultation undertaken by the Proponent with Aboriginal groups and other relevant parties during the reporting year.</li> </ul>	<ul style="list-style-type: none"> <li>• Not applicable to the 2025 reporting period.</li> </ul>
11.1	<p>The Proponent shall take all reasonable measures to prevent accidents or malfunctions that may result in adverse environmental effects.</p>	<ul style="list-style-type: none"> <li>• Refer to the Construction EMP for more information; measures are included applicable and tailored to the proposed scopes of work.</li> </ul>
11.2	<p>The Proponent shall, prior to construction, consult with Aboriginal groups on the measures to be implemented to prevent accidents or malfunctions.</p>	<ul style="list-style-type: none"> <li>• Refer to Section 6 [Consultation and Engagement] of the attached report for additional information.</li> </ul>
11.3	<p>The Proponent shall, prior to construction and in consultation with relevant federal and provincial authorities and Aboriginal groups, develop an emergency response plan in relation to the Designated Project.</p>	<ul style="list-style-type: none"> <li>• Refer to Section 4.2 [Emergency Response Plans and Communications with Indigenous Nations] and Section 6 [Consultation and Engagement] of the attached report for further detail.</li> </ul>
11.4.1	<p>In the event of an accident or malfunction with the potential to cause adverse environmental effects, the Proponent shall implement the emergency response plan referred to in condition 11.3 and shall notify relevant federal and provincial authorities and Aboriginal groups of the accident or malfunction as soon as possible and, in writing, the Agency.</p>	<ul style="list-style-type: none"> <li>• Refer to Section 4.1 [Accidents and Malfunctions]</li> </ul>
11.4.2	<p>In the event of an accident or malfunction with the potential to cause adverse environmental effects, the Proponent shall implement the emergency response plan referred to in condition 11.3 and shall implement immediate measures to mitigate any adverse environmental effects associated with the accident or malfunction.</p>	<ul style="list-style-type: none"> <li>• Refer to Section 4.1 [Accidents and Malfunctions]</li> </ul>
11.4.3	<p>Submit a written report to the Agency no later than 30 days after the day on which the accident or malfunction took place. The written report shall include:</p> <ul style="list-style-type: none"> <li>• 11.4.3.1 a description of the accident or malfunction and of its adverse environmental effects;</li> <li>• 11.4.3.2 the measures that were taken by the Proponent to mitigate the adverse environmental effects of the accident or malfunction;</li> <li>• 11.4.3.3 any views received from relevant federal and provincial authorities and Aboriginal groups with respect to the accident or malfunction, its adverse environmental effects or measures taken by the Proponent to mitigate adverse environmental effects;</li> <li>• 11.4.3.4 a description of any residual adverse environmental effects, and any additional measures required by the Proponent to mitigate residual adverse environmental effects; and</li> <li>• 11.4.3.5 details concerning the implementation of the emergency response plan referred to in condition 11.3.</li> </ul>	<ul style="list-style-type: none"> <li>• Refer to Section 4.1 [Accidents and Malfunctions]</li> </ul>
11.4.4	<p>In the event of an accident or malfunction with the potential to cause adverse environmental effects, the Proponent shall implement the emergency response plan referred to in condition 11.3 and shall submit a written report to the Agency no later than 90 days after the day on which the accident or malfunction took place, on the changes made to avoid a subsequent occurrence of the accident or malfunction, and on the implementation of any additional measures to mitigate residual adverse environmental effects taking into account the information in the written report submitted pursuant to condition 11.4.3.</p>	<ul style="list-style-type: none"> <li>• Refer to Section 4.1 [Accidents and Malfunctions]</li> </ul>

Condition No.	Condition	Notes
11.5	<p>The Proponent shall develop and implement a communication plan in consultation with Aboriginal groups. The communication plan shall be developed prior to construction and shall be implemented and maintained up to date during all phases of the Designated Project. The plan shall include:</p> <ul style="list-style-type: none"> <li>• 11.5.1 the types of accidents or malfunctions requiring a notification by the Proponent to the respective Aboriginal groups;</li> <li>• 11.5.2 the manner by which Aboriginal groups shall be notified by the Proponent of an accident or malfunction and of any opportunities for the Aboriginal groups to assist in the response to the accident or malfunction; and</li> <li>• 11.5.3 the contact information of the representatives of the Proponent that the Aboriginal groups may contact and of the representatives of the respective Aboriginal groups to which the Proponent provides notification.</li> </ul>	<ul style="list-style-type: none"> <li>• Refer to Section 4.1 [Accidents and Malfunctions] and Section 5 [Consultation and Engagement] of the attached report for further detail.</li> </ul>
12.1	<p>12.1 The Proponent shall submit an implementation schedule for conditions contained in this Decision Statement to the Agency, or anyone designated pursuant to section 89 of the Canadian Environmental Assessment Act, 2012, at least 30 days prior to the start of construction. The implementation schedule shall indicate the commencement and completion dates for each activity relating to conditions set out in this Decision Statement.</p>	<ul style="list-style-type: none"> <li>• Not applicable to the 2025 reporting period.</li> </ul>
12.2	<p>12.2 The Proponent shall submit an update to this implementation schedule in writing to the Agency, or anyone designated pursuant to section 89 of the Canadian Environmental Assessment Act, 2012, every two years on or before March 31, until completion of the activities.</p>	<ul style="list-style-type: none"> <li>• Refer to Section 2.1 [Implementation Schedule] of the attached report for additional information.</li> </ul>
12.3	<p>12.3 The Proponent shall provide the Agency, or anyone designated pursuant to section 89 of the Canadian Environmental Assessment Act, 2012, with a revised implementation schedule if any material change(s) occur from the initial schedule referred to in condition 12.1 or any subsequent update(s). The Proponent shall provide the revised implementation schedule at least 30 days prior to the implementation of the change.</p>	<ul style="list-style-type: none"> <li>• Refer to Section 2.1 [Implementation Schedule] of the attached report for additional information.</li> </ul>
13.1	<p>The Proponent shall maintain a written record, or a record in an electronic format compatible with that used by the Agency, and retain and make available that record to the Agency, or anyone designated pursuant to section 89 of the <i>Canadian Environmental Assessment Act, 2012</i>, at a facility close to the Designated Project in Canada (local facility). The record shall include information related to the implementation of the conditions set out in this Decision Statement, and the results of all associated monitoring, including:</p> <ul style="list-style-type: none"> <li>• 13.1.1 the place, date and time of any sampling, as well as techniques, methods or procedures used;</li> <li>• 13.1.2 the dates and the analyses that were performed;</li> <li>• 13.1.3 the analytical techniques, methods or procedures used in the analyses;</li> <li>• 13.1.3 the names of the persons who collected and analyzed each sample and documentation of any professional certification(s) relevant to the work performed that they might possess; and</li> <li>• 13.1.5 the results of the analyses.</li> </ul>	<ul style="list-style-type: none"> <li>• Refer to Section 3 [Follow-Up Monitoring] of the attached report for additional information.</li> </ul>
13.2	<p>The Proponent shall retain and make available upon demand to the Agency, or anyone designated pursuant to section 89 of the Canadian Environmental Assessment Act, 2012, the information referred to in condition 13.1 at a facility in Canada close to the Designated Project (or at another location within Canada and agreed upon by the Agency, should the local facility no longer be maintained). The information shall be retained and made available throughout construction and operation, and for 25 years following the end of operation or until the end of decommissioning of the Designated Project, whichever comes first.</p>	<ul style="list-style-type: none"> <li>• Refer to Section 3 [Follow-Up Monitoring] of the attached report for additional information.</li> </ul>

## Appendix B Fish and Fish Habitat Non-Conformances and Corrective Actions

Table 1 Fish and Fish Habitat Non-Conformances and Corrective Actions

Date	Type	Incident Description	Corrective Action
2025-01-12	Release	On January 12, 2025, at 9:00 PM ~0.25L of biodegradable hydraulic fluid was released to marine environment. Mechanics were swapping out two damaged hoses on the edge of the MRSS platform and were draining the hydraulic fluid into a 5-gallon bucket. A spill tray was set up below to capture any overflow. The spill tray, constructed out of soft material, started to bend, releasing approximately 0.25L of biodegradable hydraulic fluid into the ocean below. The fluid landed inside the orange spill boom, soft white spill boom, and a turbidity curtain. On January 13, 2025, during the day shift, while the bubble curtain was activated, some residual sheen that had adhered to the casing and the curtain was blown away from the spill site.	Crews promptly initiated spill response measures to address the situation. External agencies were notified.
2025-01-15	Release	On January 15, 2024, at 8:10AM ~0.7L of biodegradable hydraulic oil was released to marine environment. The crew was testing the berminghammer connections under hydraulic pressure before moving unit over to the Pluto for drilling. When the winch was engaged, a seal or O-ring broke, and the hydraulic fluid mixed with water sprayed over the berminghammer, deck of the 203 and into the marine environment. It is estimated the 1L of biodegradable hydraulic oil and water was released with ~0.7L reaching the marine environment. No marine species were in the area or directly impacted by this spill.	Crews promptly initiated spill response measures to address the situation. External agencies were notified.
2025-01-15	Release	On January 15, 2025, at 5:45AM ~0.5L of biodegradable hydraulic oil was released to marine environment. Staff were operating the powerpack to the Berminghammer on the stern of the 203 desanding barge when a fitting on the hydraulic line hose began to leak resulting in ~1L of biodegradable hydraulic oil being released from the line. ~0.5L of the biodegradable hydraulic oil reached the marine environment. No marine life in the area or impacted by the spill.	The powerpack was turned off as soon as possible and spill was contained. Silt/turbidity curtains were in place before the incident occurred helping to contain the oil to the immediate area below. External agencies were notified.
2025-01-16	ESC	On January 16 <sup>th</sup> , exceedances of PE-111578 discharge limits for copper and zinc (0.0162 mg/L and 0.0168 mg/L, respectively) were detected in water discharged from the east sedimentation pond. The results were received from the laboratory the following day; discharge from the east sedimentation pond had already ceased the previous afternoon. The results were re-run by the laboratory to confirm accuracy and subsequent analysis yielded similar results. The source of the exceedance could not be determined. The Qualified Environmental Professional (QEP) determined the non-compliant effluent discharged to Howe Sound on January 16, 2025, was unlikely to have caused adverse impacts to the receiving environment.	The QEP reviewed sampling procedures with field staff and confirmed all field quality control procedures had been followed. Additional investigation into potential contamination sources included collecting additional (i.e., duplicate bottle samples during subsequent sampling events to evaluate if intermittent contamination was introduced during sample collection. Results of the investigation did not indicate contamination was introduced during sample collection.
2025-01-31	Spill	On January 31st at 2:45pm approximately 0.03L of an unknown hydrocarbon was released to the marine environment. An unknown sheen was identified on the shoreline between MRSS and LB land works at riprap near	The sheen was contained using booms within the turbidity curtain, and recovered materials were disposed of appropriately; no source

Date	Type	Incident Description	Corrective Action
		shore. A thorough investigation was carried out of all work areas nearby and the source of the sheen is unknown. No work of the rotator, drilling, or casing advancement occurred the day of the incident	was identified. External agencies were notified.
2025-01-31	ESC	On January 31st elevated concentrations of copper (0.00508 mg/L) above the PE-111578 discharge limit was detected in water discharged from the east sedimentation pond. The copper exceedance was only detected within one of the four replicate samples taken and two of the four samples had higher concentrations of dissolved copper than total. The discharge of water was short in duration and no exceedances of the water quality guideline for copper were detected within the initial dilution zone (IDZ) of the discharge location. The on-site QEP determined the non-compliant effluent discharged to Howe Sound on January 31, 2025, was unlikely to have caused adverse impacts to the receiving environment.	External agencies were notified. The onsite QEP reviewed sampling procedures with field staff and confirmed all field quality control procedures had been followed. Additional investigation into potential contamination sources included collecting additional (i.e., duplicate bottle) samples during subsequent sampling events to evaluate if intermittent contamination was introduced during sample collection. The monitoring program was further enhanced to include two additional blanks samples each time the compliance station (SP-E-OUT) was monitored to evaluate possible sources of contamination.
2025-02-01	Release	A small sheen (approximately 0.075 L) of unknown hydrocarbon was observed floating toward shore from Howe Sound near the bow of the Beast. A site investigation identified no source. On February 1st, 2025, at 10:00am, approximately 0.075L of hydrocarbon was released to the marine environment. A small sheen was observed off the bow of the Beast floating towards shore from Howe Sound. Contaminant was unknown and from unknown source. A thorough investigation was conducted of the surrounding work area, and no signs of contaminants were observed releasing from adjacent barges (Beast, 201, and 203)	The sheen was recovered using spill booms deployed from a punt boat, with contaminated materials disposed of in designated hazardous waste bins. External agencies were notified.
2025-02-11	Release/ESC	On Feb 11, 2025, at 12:30 – approximately 1.0L of high pH water was released to the marine environment. A small sediment plume in the marine environment was observed on the north-east edge of the MOF super structure during concrete pour. The Concrete Superintendents and Water Quality Monitors were notified of the release immediately, and a thorough investigation of the forms and MOF structure were engaged. The source was discovered to be coming from a small gap in the MOF pre-cast panels between span 2 and 3 at the edge of the form. The CO2 bubbler hose was quickly deployed into the plume once it was confirmed to be from the concrete pour and closure of the gap was completed using caulking and spill pads approximately 40mins after the initial discovery. A load of unintentionally wet concrete was identified to be the source of the concrete water running through the joint to the gap. There were no more signs of leak or runoff after the gap had been plugged and the initial release had dissipated. The rest of the concrete pour went successfully with no environmental incident. No impacts to marine aquatic life were observed during or immediately following the incident.	Corrective actions included closure of the MOF pre-cast panel gap was completed using caulking and spill pads completed within approximately 40mins after the initial discovery. External agencies were notified. Following initial observation of the release, preliminary measures to mitigate effects included: <ul style="list-style-type: none"> <li>• Deploying a CO2 bubbler within the plume and taking in-situ water quality for the duration of the pour. It is estimate ~1L of contact water entered the marine environment.</li> <li>• Using spill pads and a shop vac to soak up residual concrete contact water to prevent further release into the receiving environment; and</li> </ul>

Date	Type	Incident Description	Corrective Action
			<ul style="list-style-type: none"> <li>Actioned repairs promptly to complete the concrete form work and avoid further release of contact water to the environment.</li> </ul>
2025-02-15	Sheen to water	On Feb 15, 2025, at 11:10am, approximately 0.01L of hydrocarbon was released from the SS203 barge to the marine environment. During a site walk, sheen was observed coming off the SS203 barge and falling into the water between the BOC40 and SS203 barges. Additional hydrocarbon (unknown source) buildup was observed along the edge of the barges built-in containment. The volume of the buildup on the barge deck is currently undetermined but estimated to be at least 10L, the deck buildup remained contained and did not impact the marine environment	The crew has deployed booms at both the bow and stern of the BOC-40, connecting it to the SS-203, and laid spill pads across the barge. They are retracting the walkway to clean the deck beneath it, while any freestanding water is being pumped into the oil-water separator. External agencies were notified.
2025-02-16	Sheen to water	On Feb 16, 2025, at 11:20, approximately 0.05L of hydrocarbon was observed released to the marine environment from an unknown source. During a site walk, a marine sheen was observed between the flexi float access barge on the Dynamic Beast and the Pluto barge. Approximately 25-50ml of unknown hydrocarbon (suspected to be bio hydraulic oil) fell into the water. No active work was occurring on the Pluto during the accidental release and no mechanical failures were observed.	No active works taking place or mechanical failures observed at time of observation. External agencies were notified.
2025-02-17	Sheen to water	<p>A sheen was observed coming from the lower end of the outboard on a work skiff (Unit #226127) during a repair of the tilt function wiring. The skiff was moored alongside the stern of the DB General during the maintenance activity.</p> <p>Approximately 0.03 L of oil escaped the lower end. The cause of the leak was a seal failure in the lower end of the outboard.</p>	External agencies were notified.
2025-02-21	ESC	On February 21st, elevated concentrations of mercury from treated effluent were identified in water quality samples collected on February 20th. Results indicated elevated results of 26.8 ng/L (primary) and 29.4 ng/L (duplicate) above the project established minimum discharge objective (MDO) of 16ng/L. No short-term acute guideline exists for mercury, therefore a value of 10x the applicable long-term guideline is used as a reasonable interim approach to a short-term guideline when none exists. Further, IDZ samples were taken in the marine environment on February 20th, where analytical results indicated mercury concentrations were below the laboratory method detection limit of 0.5ng/L.	Based on the observed concentration in the marine environment, the mercury was not assessed to pose an adverse effect to the receiving environment. Following the reviewed results, a site wide sampling program was completed to identify potential sources of Mercury. A standalone report (Water Quality Non-Conformance Report: 026) was generated April 4, 2025, outlining the results of the sampling program. Treatment options may include adding a low micron cartridge filter after the carbon vessels.
2025-02-22	Sheen to water	On Feb 22, 2025, at ~11:50, approximately 0.05L of Bio Hydraulic Oil was released to the marine environment. A Foreman was returning from break to perform routine maintenance on the Tri-VC aggregate import conveyor barge. As the Foreman and crew were accessing the barge, very light sheen was observed on the ocean surface by the Ez-Dock and turbidity curtains surrounding the barge. The crew observed rainwater exiting the corner of the TriVC and initiated spill response by deploying booms/socks and	Deployment of booms/socks and pads at the corner of the barge to contain the sheen. External agencies were notified.

Date	Type	Incident Description	Corrective Action
		pads at the corner of the barge to contain the sheen. No obvious immediate source was identified. Foreman contacted the Environmental team.	
2025-02-25	Environmental Incident	At approximately 9:54am on February 25, 2025, 0.03L of Bio Oil was released from the Tri VC conveyer barge to water. The crew working on the Tri-VC noticed a sheen on the water located between the EZ-Dock sections and initiated spill response measures by placing spill pads on the sheen. The environmental team responded, removing the spill pads once the sheen was absorbed and no longer present on the water. No sheen was observed outside of the immediate Tri-VC area, and the area is contained with spill booms and turbidity curtains. Approximately 0.03 L of biodegradable hydraulic oil was released from a fitting on the Tri-VC conveyor in 2100 marine area 7. The source of the release appears to be a fitting, and the cause is due to old/worn thread sealant on cylinder fitting.	Spill was contained within the immediate area using spill pads, booms, and turbidity curtains. The sheen was absorbed, spill materials were removed, and the fitting was repaired with new sealant tape. External agencies were notified.
2025-03-08	Release	At 10:00 on March 3, 2025, approximately 0.02 L of hydrocarbon was released to the marine environment from the Dynamic Beast barge. During inspection of the Dynamic Beast barge, sheen was noticed collecting on the barge deck. Sheen was noticed entering marine environment between Dynamic Barge and the NP-15 barge.	External agencies were notified.
2025-03-04	Release	On March 4, 2025, at 12:00PM ~0.05L of biodegradable hydraulic fluid was released to the marine environment. Crew was tasked with moving the Berminghammer over the casing at MO 714 to be set inside. As they were in the process of setting it into the casing the winch-line O-ring seal failed resulting in a release of ~0.530L of biodegradable hydraulic oil from the hydraulic line. A small mist of approximately 0.03L of biodegradable hydraulic fluid to spray southwards, misting the riprap and a small sheen to water from waves hitting the riprap.	The sheen to water was contained within the turbidity curtain. The remaining 0.5L of fluid was contained within the Berminghammer tarp containment at the winch deck area. Any remaining fluids that escaped dripped down into the wood poly containment around the casing structure, successfully capturing all fluid release except for the mist. There will be a more thorough cleanup of the area once the Berminghammer is on the barge. External agencies were notified.
2025-03-08	ESC	On March 8th, a pH exceedance of 9.36 was identified from the east sedimentation pond treated effluent discharged into Howe Sound and a similar exceedance of 10.97 was observed from the west sedimentation pond treated effluent on March 10th. The cause of the elevated pH levels was investigated but no point source contamination could be confirmed. Site contact water sampling conducted in late February did not identify any potentially non-conforming pH levels in non-contaminated contact water at the time of the assessment. During the non-conformant discharge, the inline wastewater treatment plant monitoring meter did not record elevated pH levels and the hourly manual readings taken by the treatment plant operator did not identify any pH exceedances; only the discharge sample taken by the water quality monitor identified the elevated pH levels.	Corrective action following these events involved the inclusion of CO2 dosing units to the TSS treatment systems to be utilized when non-conformant influent pH is detected in the sedimentation ponds. An additional preventative action of reducing the pH limit from 8.9 to 8.6 for recirculation was also implemented.
2025-03-08	ESC	On March 8, 2025, effluent quality exceedance for pH 9.36, exceeding the PE-111578 discharge limit, was observed at SP-E-OUT at 17:10 during routine daily insitu measurements taken by the Subcontractor QP. This pH value was reported to the Subcontractor and Water Treatment Subcontractor at 17:13. Upon identification of	External agencies were notified. Due to realized and forecast heavy precipitation at the time of the potential non-conformance, discharge was not halted, as halting discharge posed a significant risk of

Date	Type	Incident Description	Corrective Action
		<p>non-conforming pH, the result was validated by a benchtop meter calibration check and retesting of SP-E-OUT at 17:26. Verification returned a value of pH 9.34, supporting the earlier exceeding pH. Water quality monitoring by the Water Treatment Subcontractor during associated discharge operations did not identify potential non-conforming pH. The E500GPM in-line pH monitoring box provided a measurement of pH 8.72 at the corresponding time of potential non-conformance identified by the Subcontractor QP. Additionally, the E500GPM discharge monitoring box did not record any pH measurements &gt;8.9 for the entirety of the discharge leading up to the field samples collected by Subcontractor QP. If a pH &gt;8.9 was recorded at the E500GPM in-line monitoring box, the automatic recirculation circuit would have been immediately engaged, directing the elevated pH water to the beginning of the water treatment plant system. The E500GPM monitoring box is currently the last monitoring box before water is discharged to Howe Sound, as it is direct to the WDA Outfall 10 location. Subcontractor QP collected field parameter samples for SP-E-OUT from a bleeder valve on the bottom of a 6-inch booster pump, at the east side of East Pond, approximately 90 m from the E500GPM monitoring box. The booster pump is in place to maintain suitable discharge rates from the E500GPM, all the way to the WDA discharge location, approximately 210 m east of East Pond. The on-site QEP determined the non-compliant effluent discharged to Howe Sound on March 8, 2025, would have been rapidly buffered below the upper limit of the water quality guideline upon mixing in the IDZ and was unlikely to have caused adverse impacts to the receiving environment.</p>	<p>site flooding and unauthorized bypass. Accordingly, the Subcontractor and Water Treatment Subcontractor moved to immediately mobilize a CO2 injector to the E500GPM treatment flow path to regulate discharge pH. Corrective actions quickly restored compliant pH, confirmed with SP-EOUT pH 7.6 at 20:21, March 8, 2025. Deficiencies were identified in the process control meter pH calibration procedures and updates were made to the calibration procedures under the supervision of the QEP.</p>
2025-03-10	ESC	<p>On March 10<sup>th</sup>, effluent quality exceedance of the PE-111578 discharge limit for pH was observed by the Subcontractor QP during routine daily water quality monitoring at 09:33 at SP-W-OUT (pH 10.97). The Subcontractor QP immediately reported the pH to the Subcontractor with a recommendation to halt discharge. The Subcontractor instructed the Water Treatment Subcontractor to halt discharge at SP-W-OUT at 09:37. Both the W500GPM and ESC-W (150 GPM system) were discharging to SP-W-OUT at the time of the identified potential non-conformance. Prior to identified non-conformance, commensurate in-situ pH at W500GPM-OUT was 8.99 at 9:09. A pH &gt;8.99 was not observed at W500GPM or ESC-W based on in-line monitoring box pH readings between March 9, 2025, at 10:22 and the potential non-compliance on March 10, 2025, at 9:33 identified by the Subcontractor QP. The volume of discharge on 10 March 2025, from both the W500GPM and ESC-W (150 GPM) systems, totaled approximately 1,464 m3. The on-site QEP determined the non-compliant effluent discharged to Howe Sound on March 10, 2025, would have been rapidly buffered below the upper limit of the water quality guideline upon mixing in the initial dilution zone (IDZ) and was unlikely to have caused adverse impacts to the receiving environment.</p>	<p>External agencies were notified. The ESC-W system was shut off due to halt discharge direction, following identification of potential non-conformance. A CO2 injector was installed at W500GPM-OUT to decrease the pH to below the upper limit of the PE-111578 discharge limit prior to discharge to Howe Sound. W500GPM-OUT pH was 6.87 at 13:22 after the addition of CO2 injection. ESC-W system was not restarted on March 10, 2025, following potential non-conformance. Water quality monitoring by the Water Treatment Subcontractor during associated discharge operations did not identify potentially non-conforming pH. The W500GPM in-line pH monitoring box provided a measurement of pH 8.28 at the corresponding time of potential non-conformance. The ESC-W in-line pH monitoring box provided a measurement of pH 8.96 at the corresponding time of potential non-conformance identified by the Subcontractor QP. Deficiencies were identified in the process control meter pH calibration procedures and updates were made</p>

Date	Type	Incident Description	Corrective Action
			to the calibration procedures under the supervision of the QEP.
2025-03-14	Release	On March 14, 2025, at 11:45AM ~0.5L of oil was observed in the water. A sheen was observed around the main passenger dock. The site Monitor immediately attended the area to assess the sheen and assist with organizing cleanup. All contractors were requested to conduct a thorough inspection of their boats. No boats were found to be leaking. Source of sheen is unknown.	External agencies were notified.
2025-03-16	Release	On March 16, 2025, at 8:30AM ~0.01L of biodegradable hydraulic oil was released to the marine environment. An estimated 0.01L of bio hydraulic oil had migrated through several mitigation barriers towards marine waters and was observed off the stern of the Dynamic Beast by safety personnel. Sheen source appeared to be small residual accumulation from winch line and crane area due to recent rain event. The identifier promptly notified the environment team via the group chat and discussed the issue with a nearby environment ranger. Environment Stewards working in the area immediately directed their attention to the affected zone.	Sheen was quickly addressed by the environmental team using absorbent pads, preventing further spread. Pads were replaced as needed throughout the day and disposed of in designated waste bins. External agencies were notified.
2025-03-19	Release	On March 19, 2025, at 13:45 ~0.05L of diesel was released to the marine environment. At approximately 13:45, a sheen was observed in the marine near the MS03 shoreline. While using a crane to lift a generator (10411962) from 203 barge to the Gumption barge 0.25L of diesel spilled from the secondary containment of the generator to the barge deck. 0.05L of diesel was then washed into the Howe Sound during rainfall. The generator had been transported from the 203 to the Gumption to eventually be transported to the MLT6 for transfer offsite. Rainfall during the time of the spill transported the hydrocarbon sheen across the barge deck and off the edge into the marine environment during cleanup. Equipment was cleaned and visually inspected for any remaining free fluids prior to final lift and transfer to MLT6. Upon further investigation, it was discovered that Stage 3 had informed the Superintendent that generator was malfunctioning. The superintendent then had a mechanic complete a brief inspection and had equipment disconnected by Atkins electric and flown by crane to Gumption barge by the crew. This was not communicated to the rigging crew prior to the lift.	Immediate response included deployment of a punt boat and oil booms to skim the water, installation of absorbent booms between barges and along the stern edge, and cleanup of affected surfaces. All used spill materials were collected and disposed of in designated hazardous waste containers. External agencies were notified.
2025-03-21	Release	Approximately 0.005 L of biodegradable drilling fluid was released to the marine environment between the Arctic Tuk and 201 Desanding barge, originating from residual fluid on a drilling shaft placed on deck.	Immediate response included deployment of spill booms in the water between the barges, placement and replacement of spill pads on deck, and booms around drill equipment. The deck and surrounding marine area were actively monitored throughout the day to ensure no further sheen was observed. External agencies were notified.
2025-03-25	Release	On March 25, 2025, at 10:53AM ~0.005L of grease was released to the marine environment. During a Safety Inspection, Safety Personnel discovered a small sheen in the water and immediately came to Environment office to notify the Environment Coordinators. Upon investigating the scene, it was discovered that residual grease from the winchline was washed to the deck of the barge during	Immediate response included deployment of oil absorbent pads on deck and booms at the stern and bow of the connected barges to contain the sheen. Crews skimmed the water between barges, managed residuals with absorbent pads, and disposed of

Date	Type	Incident Description	Corrective Action
		rainfall causing a sheen that flowed over the edge of the barge into the marine environment. Response was immediately actioned.	all soiled materials in designated hazardous waste bins. Additional booms were installed around the winch line area to prevent further sheen migration. External agencies were notified.
2025-03-27	Release	Approximately 50 mL of diesel was released to the marine environment from the Leroy S Leducor Tug during fuel tank switching when the correct sequence of levers was not followed, resulting in a small spill onto the aft deck. Most of the diesel was contained on deck using booms and pads, with an estimated <50 mL entering the water and absorbed using spill socks.	Immediate response included correcting the fuel system, deploying spill pads and booms on deck, and placing spill socks in the water to absorb the remaining sheen. The Lionel D Leducor Tug assisted with cleanup, and the Environmental Coordinator confirmed no visible sheen along the surrounding shoreline or marine area. External agencies were notified.
2025-03-28	Release	Approximately 0.1 L of biodegradable hydraulic oil was released from the MS03 rotator during casing advancement, with around 100 mL entering the marine environment and the remainder onto riprap in front of the rotator.	Immediate response included shutdown of work, deployment of oil absorbent pads and booms in the marine environment, and cleanup of the rotator, scaffolding, and riprap. The rotator was repaired and tested, and booms were left overnight and replaced the following morning to contain any residual hydrocarbons. External agencies were notified.
2025-04-06	Release	Approximately 0.005 L of mixed hydrocarbon, presumed to be biodegradable drill fluid, was released to the marine environment off the Arctic Tuk due to accumulation on deck near the drill steel rack. Crane movement and heavy rain caused the sheen to migrate over the barge edge, escaping existing spill barriers.	Immediate response included deployment of a spill boom by environmental personnel, which successfully contained and absorbed the release. The boom was removed and disposed of in designated hazardous waste bins. External agencies were notified.
2025-04-20	Release	A light hydrocarbon sheen was observed near the FlexiFloat and MLT-6 adjacent to the Dynamic Beast, with no immediate or confirmed source identified. Inspections of nearby vessels and barges, including the Beast, HS Hope, and support vessels, found no active leaks, and weather conditions the previous day may have transported residual hydrocarbons into the area.	Immediate response included mobilizing crews to deploy absorbent booms around the affected area and conducting surface skimming using small punts. Booms were left in place as a precaution to contain any residual or recurring sheen and were scheduled for removal the following day. External agencies were notified.
2025-04-21	ESC	On April 21st there was a non-conformant treated effluent discharge to Howe Sound from the west sedimentation pond that exceeded the PE-111578 discharge limits for of copper and zinc. The cause of the exceedance could not be determined and subsequent reanalysis of the laboratory results yielded variable results. Discharge had already ceased by the time the exceedance was identified by the laboratory. It is suspected that lower pond levels during drier periods led to sediments in the pond being disturbed and entrained when discharged. The on-site QEP determined the non-compliant effluent discharged to Howe Sound on April 21, 2025, was unlikely to have caused adverse impacts to the receiving environment.	In response to the exceedance, a withdrawal point for water trucks was established at the TSS treatment system for the pond so that water could be preferentially used to support dust suppression efforts during dry periods of the year. Site staff were instructed to avoid unnecessary discharge when the sedimentation pond levels are low in order to prevent unnecessary re-suspension of particulates that may be concentrated at the pond bottom sediments.
2025-04-25	Release	Less than 0.25 L of gasoline was released to the marine environment from a tank vent due to overfilling and fuel expansion. No work was ongoing at the time, and the spill was immediately reported to the Environmental Team.	Response actions included deploying absorbent booms around the FlexiFloat and MLT-6, skimming the surface with pike poles and spill pads, and containing the affected

Date	Type	Incident Description	Corrective Action
			area. Booms were left in place as a precaution for the remainder of the day and were scheduled for removal the following day, and the punt was lifted out of the water for further assessment. External agencies were notified.
2025-05-04	Release	Approximately 0.5 L of an unknown hydrocarbon was observed as a sheen in Howe Sound during a morning drone flight. Inspections of nearby boats found no signs of leaks.	Response crews deployed a skiff and spill booms to contain and absorb the sheen, and all used cleanup materials were disposed of in designated waste bins. External agencies were notified.
2025-05-10	Unknown Sheen	A small hydrocarbon sheen, estimated at 50 mL, was observed in the marine environment between the Floatel and shoreline. The source of the sheen could not be determined.	The environmental action team contained and cleaned up the sheen, and all response materials were collected in sealed bags for offsite disposal at an approved facility. External agencies were notified.
2025-05-10	Unknown Sheen	A small hydrocarbon sheen, estimated at 50 mL, was observed in the marine environment between the Floatel and shoreline. The source of the sheen could not be determined.	The environmental action team contained and cleaned up the sheen, and all response materials were collected in sealed bags for offsite disposal at an approved facility. External agencies were notified.
2025-05-10	Unknown Sheen	A faint hydrocarbon sheen, estimated at 0.05 L, was observed near the east Floatel gangway. Inspections of nearby boats found no signs of leaks, and the source of the sheen could not be determined.	Response crews mobilized to address the sheen, but wind dispersed most of it before arrival. Remaining hydrocarbon was cleaned up using spill pads and poles, which were then disposed of in the designated hazardous waste area. External agencies were notified.
2025-05-28	Release	Approximately 10 mL of hydraulic oil was released to the marine environment from a cracked hose on the Haisla Northwind barge crane.	Response actions included freezing the scene, shutting down the crane, deploying a containment boom, and using absorbent pads to clean up the spill. All fluid was contained and removed, with no visible sheen remaining on the water. External agencies were notified.
2025-06-01	ESC	On June 1st, treated effluent exceeding the PE-111578 discharge criteria for total zinc was discharged to Howe Sound from the west sedimentation pond. The sampling of the water from the treatment system and the sedimentation pond the week prior was compliant but subsequent sampling during the discharge event identified an exceedance of the total zinc discharge limit. The investigation into the source of the exceedance identified that the sampling port used to collect the water samples was galvanized which may have contributed to the elevated zinc concentration. On-site follow-up investigation determined that a zinc galvanized fitting had been installed at the effluent flow meter located upstream of the discharge sampling port just prior to sample collection. The galvanized fitting is speculated to be the source of zinc in the effluent quality sample. The on-site QEP determined the non-compliant effluent discharged to Howe Sound on June 1, 2025, was unlikely to have caused adverse impacts to the receiving environment.	Following the event, all wastewater treatment plants on site were checked for galvanized components and any components that required replacing were identified and replaced. The wastewater treatment operator has altered their procurement process to include additional verification checks to ensure that no galvanized components are ordered or installed at the treatment plants in the future.

Date	Type	Incident Description	Corrective Action
2025-06-13	Release	Approximately 2 L of hydrocarbon sheen was observed near the east gangway, floating toward the Floatel. Inspections of nearby vessels found no signs of leaks, and the source of the sheen is unknown.	The spill response team deployed a skiff and booms to contain and clean up the sheen. External agencies were notified.
2025-06-13	Release	Approximately 2 L of sheen was observed in the marine environment between the Beast and the starboard side of the Arctic Tuk barge. Inspections of all barges, equipment, taxi boats, and tugboats found no source, and both the substance and cause of the spill are unknown.	Response actions included freezing the scene, deploying booms and spill pads to contain and absorb the sheen, and skimming the area with oil booms. Shoreline booms were also installed to prevent further contamination. Perimeter booms remained until the sheen dissipated, and all absorbent materials were subsequently removed. External agencies were notified.
2025-07-31	ESC	On July 31st, an unauthorized bypass of the stormwater management system occurred at the MOF when treated water was being transferred between the sedimentation ponds via transfer hose. The water transfer lines were not connected properly which resulted in clarified treated effluent escaping the transfer hose and entering Howe Sound. The bypass discharge was brief (approximately 5 minutes), low volume (an estimate of <math>2.84 \text{ m}^3</math>) and receiving environment monitoring results do not show exceedances of water quality guidelines; therefore, the on-site QEP concluded that there was negligible risk of adverse impacts to the receiving environment.	Corrective actions following this event included improving the labelling of hoses to increase visibility and tracing of hose connections. Disconnected hoses will be capped and secured to prevent accidental discharge.
2025-08-15	ESC	On August 15th, terrestrial stormwater discharges associated with the project were observed at three (3) locations. No water quality exceedances were recorded during these observations. Iron-laden non-contact stormwater was observed discharging to Howe Sound from the FST MS03 P3 abutment. The stormwater flowed through a seam in the bedrock below the P3 abutment and discharged directly into the Howe Sound. As a precautionary measure, the contractor deployed sorbent booms along the shoreline at the discharge area, although no hydrocarbon discharge was observed and the use of sorbent booms was not required. A turbid stormwater discharge unrelated to the project was also observed at one (1) location. Turbid stormwater was observed discharging to East Creek and ultimately to Howe Sound, originating from upstream of the Fortis project site. ForticBC provided WLNG with hourly water quality monitoring data indicating upstream/background turbidity of 1,282 NTU at 13:00 on August 15, approximately one hour prior to the observation by the Environmental Monitor.	As a precautionary measure, the contractor deployed sorbent booms along the shoreline at the discharge area, although no hydrocarbon discharge was observed and the use of sorbent booms was not required.
2025-08-15 - 2025-08-16	ESC	On August 15th, during heavy precipitation turbid stormwater was observed entering Mill Creek from the 36 Tonne Bridge. On August 16th, pooled water on the 120 Tonne Bridge deck seeped through damaged plywood decking and dripped from the bridge into Mill Creek. Although a small amount of water dripping from precipitation that contacts the sides of the bridges is normal during heavy rains, these events were classified as an unauthorized bypass. Following each observed event, in-situ water quality sampling was taken up and downstream of the bypass area. Results of the sampling indicated turbidity was not elevated above water quality guidelines,	The following corrective actions were developed: <ul style="list-style-type: none"> <li>• Cleaned dirt and debris off the 120-Tonne bridge.</li> <li>• On August 15th, pumps were installed at both bridges to remove road runoff pooling on the bridges and direct the runoff to the contact water management system.</li> </ul>

Date	Type	Incident Description	Corrective Action
		and induced impacts were unlikely due to the volume of bypassed water was relatively low.	<ul style="list-style-type: none"> <li>Removed damaged pulpwood and replaced damaged sections on the 120-Tonne bridge; and</li> <li>Installed additional erosion and sediment controls consisting of a conveyor belt berm and collection sump.</li> </ul>
2025-08-15	Release	On 15 August 2025, turbid stormwater accumulated on the barge deck was observed discharging over the south side of the barge into Howe Sound during barge unloading activities. The EM notified WLNG of the observed discharge. At the time of the observation, personnel were deploying straw wattles, sorbent pads, and sorbent socks on the barge deck as a response measure. Although sorbent materials were deployed, no hydrocarbon discharge to the marine environment was observed by the EM, nor was any hydrocarbon sheen reported in the daily water quality report.	Following the observation, the Contractor requested the QP to conduct opportunistic water quality sampling at the discharge location. The QP conducted water quality measurement and also reported that the observed plume had dissipated compared to earlier observations. Surface water turbidity (<0.5 m) was elevated relative to background, while turbidity at 0.5 m depth and below was similar to background conditions. The QP conducted water quality measurements at the subject location relative to a potential additional discharge of turbid stormwater from the subject barge deck, reporting that, "Readings at surface and 0.5 m are elevated from background. North Arm Trader (subject barge) left CPA at approximately 18:40.
2025-08-27	Release	Approximately 1–1.5 L of biodegradable hydraulic oil was released to the marine environment at the stern of the Pluto barge in the MO5B area. Initial inspections of the Pluto and Arctic Tuk barges found no active leaks, with a small pinhole later identified on a return hydraulic hose.	Response actions included deploying containment booms around the Pluto barge using a skiff, and additional booms were later deployed around the Dynamic Beast barge to secure active work areas and contain the sheen. External agencies were notified.
2025-08-28	Release	Approximately 4 L of biodegradable hydraulic oil was released to the marine environment from a cracked hose on the rotator staged on Spudnik at M0714. The hose failure went unnoticed prior to operation, and some oil was contained on the rotator, while the remainder entered the marine environment inside the turbidity curtain.	Response actions included shutting down the rotator power pack, freezing the scene, deploying absorbent pads within the turbidity curtain, and skimming the water with punts. Containment booms were used to enclose the work zone, and additional booms were later deployed by the Dynamic Beast crew to secure surrounding areas. External agencies were notified.
2025-09-03	Release	Approximately 0.035 L of soot was released to the marine environment from brief black smoke emissions from the tugboat Ocean Defiant during incomplete combustion of the starboard generator. The cause was linked to low fuel levels during refueling, which caused the generator to stall and emit soot.	Response actions included placing containment booms around the tugboat, temporarily shutting down its engines, deploying additional booms, and skimming the water to remove soot particles. Contaminated materials were collected and disposed of in designated hazardous

Date	Type	Incident Description	Corrective Action
			waste bins. External agencies were notified.
2025-09-27	Release	Approximately 0.005 L of residual engine oil from the Arctic Tuk's ballast exhaust stack entered the marine environment as a small sheen via accumulated deck water. No construction activities were halted.	Immediate actions included adjusting oil absorbent booms along the barge deck, removing residual sheen from the deck, and adding additional spill mitigation measures such as pads and plant nappy liner. Environmental personnel monitored the area, and supervisors cleaned the exhaust stack while maintaining ongoing monitoring and mitigation as required. External agencies were notified.
2025-09-27	Release	On September 27, 2025, at 1:41 PM ~0.1L of hydrocarbon was released to water. U conducting a thorough walk around DB Patrick, a sheen was observed also off starboard and stern in the water, but the sheen source remained unknown at the time of walk. Conducted inspection, review, and verification to ensure there were no leaks on DB Patrick and within the surrounding work area. Verified no leaks. The inspection included all sides of DB Patrick (starboard, port bow, and stern) as well as the deck barge	External agencies were notified.
2025-09-29	ESC	On September 29th during heavy precipitation, turbid runoff and sloughing of material was observed entering the marine environment at the blasting area for the pioneer access road in the Mooring Structure #4 area for the FSTs. Water running through the active blast area (blasted the day before with another blast planned for the day of the incident) flowed downslope of the pioneer access road and along the toe of the road slope. Sediment laden water and soil were observed flowing into the marine environment. As part of the established mitigation measures for the work area, silt curtains were installed around the impacted area prior to the issue being identified. Upon further inspection later in the morning (~ 08:00) it was also observed that water from the Q1 and Q2 ephemeral drainages along with additional hillside runoff had bypassed the diversion that was established and was flowing through an unprotected section of the non-contact ditch along the edge of the access road. The water infiltrated underneath the poly liner of the ditch, flowed through a gap in the liner and back on top which resulted in turbid water mixing with clean non-contact water. The turbid water flowed down the remainder of the non-contact ditch and flowed into the marine environment through the recently constructed outfall pipe (OUT-13). The QEP concluded that there was low potential for adverse impacts to the receiving environment from the relatively small and short-term bypass on September 29, 2025.	<p>The following corrective actions were developed:</p> <ul style="list-style-type: none"> <li>• Assessment of the area once enough daylight was present</li> <li>• Mobilized rock hammer to area to break rock to divert hillside runoff around work area and into nearby natural vegetation</li> <li>• Non-contact ditch problem areas were managed by using sandbags and poly liner to contain water outside of non-contact ditch. A pump was installed to manage water at the toe of the slope on the FST access road.</li> <li>• Poly liner was lifted in areas where water had seeped under, and sandbags were placed there to redirect water into non-contact ditch</li> <li>• Q1 and Q2 diversions were reinforced to help keep water in non-contact ditch.</li> </ul>

Date	Type	Incident Description	Corrective Action
2025-10-10	Release	Approximately 0.01 L of residual hydrocarbon from the DB Patrick barge deck was released to the marine environment due to heavy rainfall washing affected rainwater into Howe Sound.	Immediate actions included deploying spill pads, booms, and Ultratech filter socks on the deck, and placing booms in the water via skiff. All used spill response materials were collected and disposed of in designated hazardous waste containers. External agencies were notified.
2025-10-10	ESC	On October 10th, site contact water was observed entering Howe Sound adjacent to the northeast corner of the MOF, constituting an unauthorized bypass. The source of the water appeared to be primarily turbid storm water which had collected in the MOF swale, and subsequently passively released to Howe Sound. Water in the MOF swale runs into a sump upslope of the northeast corner of the MOF. A diversion pump in this sump was off during rainfall, leading to a buildup of water and eventual discharge to Howe Sound. In-situ water quality samples were collected from the light turbid plume that became visible in the immediate MOF shoreline area. Collected water quality parameters indicating no exceedance of marine water quality guidelines in the receiving environment. The potential for adverse impacts to the receiving environment were assessed to be low by the on-site QEP.	A dewatering team were deployed and started the 6" pump. Shortly after the pump was turned on the subsurface flow stopped running through the berm. An additional pump was added to the MOF sump to pump to lower water levels.
2025-10-10	Release	Approximately 0.1 L of hydraulic fluid mixed with rainwater was released to the marine environment from drips under a GFL truck staged on KP203.	Immediate actions included deploying spill booms between K251 and KP203 and along the shoreline, using spill pads and socks to contain the sheen on the barge deck, and placing a plant nappy under the truck's undercarriage. External agencies were notified.
2025-10-11	Release	Approximately 4 L of bio-hydraulic oil was released into the marine environment from a compromised clamping ram cylinder during casing advancement at M05A. Most of the spill was contained within the turbidity curtain.	Immediate actions included halting drilling, freezing the scene, notifying environmental personnel, deploying spill pads on the rotator, and placing booms and pads in the water to contain and absorb the oil. Pads were replaced as needed until the spill was fully mitigated. External agencies were notified.
2025-10-13	Release	Approximately 0.05 L of diesel was released from a loose bung on a bulk fuel tank on the Pacific Lifter due to thermal expansion. No work was ongoing, and no powered equipment was in operation. The adjacent tank had the same issue but did not release fuel. Some diesel likely entered the marine environment, though no sheen was observed	Immediate actions included tightening the bung, containing the affected area with absorbent socks, cleaning the deck and fuel cube with spill materials and soap, and disposing of all contaminated materials as hazardous waste. External agencies were notified.
2025-10-18	ESC	On October 18th, the former temporary stormwater conveyance berm along the land-MOF interface had been removed to facilitate module offload traffic. Heavy rains during off-loading led to stormwater runoff that flowed toward the MOF, over the deactivated diversion swale, onto the MOF and into Howe Sound.	Upon discovery of the bypass, a shallow secondary swale was manually dug to convey water to the dedicated sump while maintaining access. Sandbags and straw waddles were placed as additional measures to help manage sediment laden water from getting onto the MOF and then

Date	Type	Incident Description	Corrective Action
			into Howe Sound. An update of the MOF off-loading procedures included shutdown during rain events. A runoff diversion system was installed that could be left in place when LNG modules are being transported from the MOF.
2025-10-19	Release	On October 19, 2025 at 9:54AM turbid water was reported flowing into Howe Sound from FST Area. A malfunctioning pump allowed the road runoff sump at the base of the FST access road to overflow through the road base and out through the shoreline riprap into Howe Sound through various points. This overflow was due to the sump having an amphibian exclusion mesh over the filter head for the hose and prevented suction. Once mesh was removed at 10:27 a.m., pump returned to operational capacity. The seepage of the sump through the road was due to hydrostatic pressure that pushed sediment laden water through the filter cloth material that the sump was lined with and found its way through rock seams along the rock face, under the road and then out to Howe Sound. Due to the limited extent of the turbid water plume and the short duration, the on-site QEP assessed there to be a low risk of adverse impacts to the receiving environment.	Team removed the amphibian exclusion mesh that was covering the filter head for the hose and the pump returned to operational capacity. The FST sump was lined to prevent seepage.
2025-10-22	Release	At 14:25 on October 22, 2025, approximately 4.5L of engine oil was released to the marine environment. The spill occurred in the middle of Howe Sound, >1,000 meters from the nearest shoreline. Weather conditions were calm with no wind or wave activity. The incident involved a Yamaha 150-horsepower four-stroke outboard motor mounted on Roe 4, which released oil from its crankcase through the drain plug opening. The total volume of oil released was estimated at less than 4.5 liters of Yamaha 10W-30 marine engine oil. Some residual oil remained in the sump and oil filter, and a small surface sheen was observed. The spill occurred when the drain plug on the engine's oil sump loosened, backed out, and was eventually lost, allowing crankcase oil to gradually leak from the motor. The low-oil alarm activated, alerting the operator to the issue. Investigation determined the most likely cause to be a loose or improperly secured drain plug bolt.	The outboard motor had been serviced off-site by a third-party repair facility on October 17, 2025, and was otherwise in good working condition. Upon detecting the alarm, the operator immediately shut down the engine, conducted an inspection, and deployed absorbent pads around the lower leg as a precaution. The incident was then reported to the Environmental Supervisor. External agencies were notified.
2025-10-24	ESC	On October 24th, during significantly heavy rainfall, there was a brief period of stormwater runoff from the upper-West Barge ramp area, down the barge ramp, to Howe Sound. A sandbag berm had been installed to redirect site runoff for collection in the contact water management system; however, the lower corners of the sandbag berm were not completely sealed allowing runoff to pass through the berm. Around the same period, at the on-going works for replacement of the Outfall-1 culvert, water accumulation escaped the in-place containment, overflowed the inlet of the old Outfall-1 culvert, circumvented the pumps in place and discharged through the old culvert to Howe Sound, adjacent to the West Barge Ramp. Per the ambient weather station in the 4200 Area, the rainfall peaked at ~19.2mm/hr at the time of the event. Due to the limited extent of the turbid water plume and the short duration, the on-site QEP assessed there to be a low risk of adverse impacts to the receiving environment.	Corrective actions from the West Barge Ramp and at Outfall-1 bypasses included requiring Civil Permits to include task specific erosion and sediment control plans for specific activities such as barge loading/unloading. A second 6" pump was mobilized and setup at the inlet of the old Outfall-1 pipe to direct the water to the contact water management system. A pipe plug was installed into the old Outfall-1 inlet to cease the overflow water passing through the culvert. Submersibles and trash pumps were used to manage temporarily diverted runoff during high intensity rainfall and to route contact water to the contact water management system.

Date	Type	Incident Description	Corrective Action
2025-10-24	ESC	On October 24th, during significant rainfall, clear run-on water cascaded into the upper 4100 non-contact ditch and breached the non-contact ditch banks. The water was then observed flowing around a soil stockpile, contacting the construction area, and then flowing back to the non-contact ditch towards Outfall 02, and discharged to Howe Sound. Field investigation revealed significant water introduction to the ditch had exceeded the ditches capacity to convey the full volume of water. Per the onsite ambient weather station in the 4200 Area, there was approximately 51.9mm of rainfall since midnight. Following discovery, a pump was mobilized to intercept the overflow and convey it to the contact water management system. During an inspection on October 26, 2025, 4100 ditch overflow waters were observed re-entering the ditch because the pump was not operating. The pump was turned on and the return flow to the ditch was interrupted and diverted to the contact water management system. Due to the limited extent of the turbid water plume and the short duration, the on-site QEP assessed there to be a low risk of adverse impacts to the receiving environment.	Following discovery, a pump was mobilized to intercept the overflow and convey it to the contact water management system. Nightshift civil works began pulling back the soil stockpile to make room to shape in a ditch to get the overflow water to passively drain to the contact water management system. A temporary contact water swale has been installed to intercept the 4100 non-contact ditch overflow and convey it to the contact water management system. Excess rock from the 4100 ditch was removed to increase the capacity of the ditch. A site-wide assessment was completed to identify any other areas of potentially unmitigated ESC risks.
2025-10-24	Release	At 1:00 pm on October 24, 2025, roughly 0.1L of engine oil entered the marine from the surface of the Golden Gate on MS03. A bucket of engine oil was observed half full and without a lid inside of an i-beam on the surface of the Golden Gate on MS03. Engine oil spilled into the i-beam and other contained areas on the Golden Gate and were filling with rainwater. The engine oil was mobilized from the surface of the Golden Gate on MS03 by rainwater during a significant rain event and entered into the marine environment.	Due to rough sea conditions spill response was not possible at the time of the spill and at 2:30 pm the sheen within the marine had dissipated. External agencies were notified.
2025-10-26	ESC	At approximately 13:40 on October 26, 2025 during heavy rains, there was a brief period of surface runoff down the East Barge Ramp causing a minor plume within Howe Sound. The Fortis Contractor (FKM) was loading a barge during a rain event and the straw wattle ESC mitigations in place to intercept the runoff were not effective at preventing a small amount of stormwater runoff from entering Howe Sound. Due to the limited extent of the turbid water plume and the short duration, the on-site QEP assessed there to be a low risk of adverse impacts to the receiving environment.	A swale was subsequently installed at the top of the ramp to divert runoff away from the ramp and to the contact water management system. Additionally, criteria were put in place to trigger a ramp shutdown during heavy rains.
2025-10-28	Release	A hydrocarbon sheen was observed in Marine Area 2 under the West gangway by a Słwłwú7mesh Úxwumixw (Squamish Nation) Indigenous Monitor and confirmed by the EM. The source of the sheen could not be determined.	The joint spill response team from promptly deployed, contained, and removed the sheen. External agencies were notified.
2025-10-29	Release	Approximately 0.5 L of hydrocarbon sheen was observed in the marine environment during core barrel advancement at M05A, with additional sheen noted between the Beast and Pluto. Inspections of equipment, barges, and tugboats by multiple contractors found no leaks, and the source of the sheen could not be determined.	Response actions included suspending drilling, deploying containment and absorbent booms to skim and absorb the sheen, and conducting comprehensive equipment inspections. Booms were left in place overnight, and no sheen was visible within an hour of the initial observation. External agencies were notified.
2025-10-31	ESC	On October 31st during intense rainfall, while checking on the MOF water management operations, the MOF sump	The 6-inch diesel pump was adjusted to remove the airlock and increased

Date	Type	Incident Description	Corrective Action
		was observed to be nearly full and contact water from site was escaping through the porous fill material toward Howe Sound. A small turbid plume had formed under the MOF behind the oil containment boom. The 3" submersible pump, and the 6" diesel pump were both operating in the MOF sump at the time of the observation, but the 6" pump was not pumping water due to an airlock, thereby significantly reducing the overall pumping capacity at a time of high runoff inflows. Due to the limited extent of the turbid water plume and the short duration, the on-site QEP assessed there to be a low risk of adverse impacts to the receiving environment.	to a higher output and was inspected to ensure no other issues. A secondary 6-inch diesel pump staged at the sump was also utilized to lower water levels in the MOF sump and stop the overflow from the MOF sump.
2025-10-31	Release	~1000 L of water was discharged from the Pacific Lifter using the hydrocarbon filtration system before lab results showed elevated levels of Zinc, Copper, Cadmium, and Manganese above guideline limits. The metals likely originated from the containment tray under the rotator assembly on the Spudnik platform.	Immediate actions: discharge was stopped, signage posted prohibiting further use, and 1000 L totes were put in place for containment of any future water. External agencies were notified.
2025-11-01	Release	On Nov 1, 2025, ~0.05 L of hydrocarbon flowed from the Arctic Tuk deck into the marine after deck pumps were temporarily paused during rainfall.	Immediate actions: booms were deployed to contain the area, pumps reactivated, and absorbent pads placed to capture any residual sheen. External agencies were notified.
2025-11-02	Release	Approximately 0.25 L of biodegradable hydraulic oil was released to the marine environment from Marini drill #07006 during drill setup at Floatel #2 Anchor "H," caused by accidental activation of a shutoff valve.	Crews skimmed the sheen using spill booms until no sheen remained, and used materials were disposed of in designated hazardous waste bins, with booms left in place as a precaution. External agencies were notified.
2025-11-04	Release	Approximately 0.3 L of unknown hydrocarbon was released to Howe Sound from Lifeboat No. 4 during an LSA survey while it was being hoisted alongside the Floatel.	Response actions included deploying containment booms at both ends of the gangway and cleaning up the spill using booms, spill pads, and reaching poles, with the release contained between the vessel hull and the floating pontoon. External agencies were notified.
2025-11-08	Release	Approximately 0.1 L of hydrocarbon sheen was observed in Marine Area 9 around the Dynamic Beast, Pluto, and Badger barges, with no source identified following inspections.	Crews deployed oil absorbent booms to contain the area and skimmed for residual product, with the sheen dissipating and being absorbed by the booms. External agencies were notified.
2025-11-08	Release	Approximately 0.01 L of oil was released to the marine environment from residual oil on the outboard motor of skiff 226127 at the stern of the DB Patrick.	Sorbent pads and booms were deployed to contain and absorb the sheen, and the skiff was lifted out of the water, with no sheen observed beyond the immediate area. External agencies were notified.
2025-11-08	Release	Approximately 0.5 L of hydrocarbon sheen was observed within the turbidity curtain off the stern of the Pluto barge, with no specific source identified following inspections. The sheen was associated with overflow from rotator containments due to high water volumes.	Crews froze the scene, deployed absorbent booms and pads, skimmed the contained area, and cleaned and dewatered rotator containments. Additional mitigation measures were implemented, including higher-capacity pumps, nappy liner

Date	Type	Incident Description	Corrective Action
			installation, and additional absorbent booms, prior to resuming operations. External agencies were notified.
2025-11-10	Effluent/ESC	<p>On November 10, a total of 3,625 m<sup>3</sup> clarified effluent was discharged from the West Sedimentation Pond discharge location SP-W-OUT to Howe Sound. An effluent sample was collected in duplicate at 11:12. Trains 2, 3 and 5 of the TSS settling system were active at the time of sample collection. The SP-W-OUT effluent quality results reported November 11 for T- Pb (0.0241 mg/L) and T- Zn (0.0186 mg/L) exceeded PE- 111578 discharge limits. Further discharge was suspended on November 11, following receipt of the November 10 effluent analytical results. Follow-up investigation included retesting of submitted samples, evaluation of quality control samples, and inspection of sampling components for potential source of contamination. Retesting and evaluation of quality control confirmed the original results. Potential contamination sources were not identified. The West Sedimentation Pond influent concentrations (station SP-W-IN) indicate T-Pb and T-Zn were below the effluent concentrations on November 10, suggesting contact water stored in the pond was not the source of T-Pb and T-Zn in the effluent. The TSS settling trains and SP-W-OUT discharge monitoring results were evaluated for trends. Effluent from the individual TSS settling trains collected in November and early December at the SP-W-OUT and TSS settling train effluent stations, met discharge limits for T-Pb and T-Zn, suggesting the November 10 results for SP-W-OUT were an isolated event and the root cause was not identified. No discernable influence was observed in receiving environment samples collected November 10, 2025; therefore, the on-site QEP assessed there to be low potential for adverse effects to the receiving environment from the effluent discharged on November 10, 2025.</p>	<p>Effluent discharge was suspended on November 11, 2025 after receiving non-compliant effluent results. Effluent quality results from the individual sampling trains were reviewed and met discharge limits, therefore discharge from West Sedimentation Pond resumed on November 13. The TSS settling trains and SP-W-OUT discharge monitoring results were evaluated for trends. Results from individual trains and from combined effluent at SP- W- OUT collected November 11 through December 5 met PE- 111578 discharge limits. These data indicate the November 10, 2025 exceedances for T-Pb and T-Zn were an isolated event.</p>
2025-11-10 to 2025-11-23	Effluent/ESC	<p>The following barge-based water treatment systems discharged water exceeding short-term water quality guidelines (WQG) between November 10 – 23, 2025 to the marine receiving environment.</p> <p>L6001 Treatment System (drill water &amp; deck):</p> <ul style="list-style-type: none"> <li>• On November 12, 2025, an estimated 12,981 gal of drilling process water from the M05B P6 pile was discharged to the marine environment. Zinc (0.145 mg/L) was above the short-term WQG.</li> <li>• On November 15, 2025, an estimated 38732 gal of deck water was discharged to the marine environment.</li> <li>• On November 23, 2025, an additional 31708 gal was discharged. Zinc (0.185 mg/L) and copper (0.0504 mg/L) were above the short-term WQG.</li> </ul> <p>SS201 Treatment System (drill water):</p> <ul style="list-style-type: none"> <li>• Between November 18 - 22, 2025, an estimated 237,945 gal of drilling process water was intermittently discharged to the marine environment. Zinc (0.248 mg/L) and copper (0.00743 mg/L) were above the short-term WQG</li> </ul>	<p>Discharges to the marine environment were halted following the identification of the water quality guideline exceedances for all treatment systems and influent streams where exceedances occurred.</p>

Date	Type	Incident Description	Corrective Action
		<p>SS203 Treatment System (drill water &amp; deck water):</p> <ul style="list-style-type: none"> <li>Between November 18 - 19, 2025, an estimated 96,643 gal of drilling process water was intermittently discharged to the marine environment. Copper (0.00470 mg/L) was above the short-term WQG.</li> <li>Between November 10 - 20, 2025, an estimated 133,632 gal of deck water was intermittently discharged to the marine environment. Copper (0.00417 mg/L) was above the short-term WQG.</li> <li>November 1 – 8, 2025, an estimate 1,252,176 gal was discharged. Copper (0.00548 mg/L) was above the short-term WQG.</li> </ul> <p>Automated exceedance notifications were not issued by the laboratory due to an administrative error when updates to the exceedance metrics were requested to be changed in the system in addition to contact information for notification recipients. The laboratory confirmed receipt of request but did not implement change. Exceedances of discharge objectives were not immediately identified by the QEP responsible for reviewing data due to the lack of automated notifications and were not detected until manual review of the datasets on November 22, 2025. The lack of notifications did not result in the exceedances occurring but did result in higher volumes of non-compliant water being discharged.</p>	
2025-11-10	ESC	<p>On November 10th, turbid contact water was observed entering the intake of Outfall-1 in the 4100 Area during a period of heavy rainfall. Upon investigation of the culvert outfall, a small turbid plume was observed in the immediate marine environment. The source was determined to be turbid water percolating through porous rock in a catchment sump adjacent to the Outfall-1 intake headwall. At the time of discovery, a 2" pump was running in the small sump to divert turbid water; however, it had insufficient capacity causing the sump to overflow towards the non-contact water culvert. Due to the limited extent of the turbid water plume and the short duration, the on-site QEP assessed there to be a low risk of adverse impacts to the receiving environment.</p>	<p>An additional 3" submersible pump was placed in the sump and lowered the water to a level where it was not bypassing the contact water sump.</p>
2025-11-10	ESC	<p>On November 10th, during a heavy rainfall event, a small, short-lived plume of turbid water was observed at the end of the northeast barge ramp in Howe Sound. Potential sources were unclear at the time of the discovery; however, heavy rainfall combined with active use of the newly re-established barge ramp was determined to have caused surface water to mobilize sediment into the marine environment. Sheet flow was running from the 1300 Area, down the barge ramp underneath the coconut matting on the lower face of the barge ramp and into Howe Sound.</p>	<p>A conveyor belt berm and French drain were installed to intercept runoff at the top of the East Barge Ramp and to redirect it to the contact water management system.</p>
2025-11-11	Release	<p>Approximately 0.05 L of drilling fluid was released to the marine environment when a cluster drill on a drill string was temporarily held in the water during transfer from Spudnik to the L6001 desanding barge.</p>	<p>Crews immediately landed the drill on deck, deployed absorbent boom from a punt to capture the sheen, and continued monitoring to ensure no further sheens were observed. External agencies were notified.</p>

Date	Type	Incident Description	Corrective Action
2025-11-13	ESC	<p>On November 13th, during ongoing significant rainfall, there were seven events where turbid (contact) water briefly released to a fresh or marine water receiving environment. Events include the following:</p> <ul style="list-style-type: none"> <li>• FST 4 sump area: At approximately 4:19 a.m., the nightshift dewatering team reported the sump was overwhelmed during a period of intense rainfall. The team observed turbid water migrating beneath the ocean-side berm (not overtopping) and progressing toward Howe Sound.</li> <li>• Area 1/4100 (Outfall-1): Site water entered a utility pull-box in 4100 and flowed through the unfinished conduit, exiting the open end at the Floatel 2 utility area (western end of site). Contact water then escaped to Howe Sound under the unfinished lock-block wall.</li> <li>• Area 1/4100: Site contact water being held, overwhelmed a collection sump, resulting in contact water runoff from the Ro-Ro barge ramp area to Howe Sound.</li> <li>• Area 2/4100: Site contact water being held, overwhelmed a collection sump in the West Barge Area, resulting in contact water runoff across the road and pedestrian walkway to Howe Sound</li> <li>• Area 3/4200: Site contact water being held in the 4200-collection sump got to a level where it was able to briefly exit through a culvert with water transfer hoses in it near the Main Passenger Dock, towards Howe Sound.</li> <li>• Upper 4100: Seepage water from the non-contact ditch entered site, contacted the stockpile area and subsequently re-entered the non-contact ditch towards Outfall-02.</li> <li>• 1300 area: Pooled water adjacent the pedestrian bridge (east side of Mill Creek) seeped over the exiting concrete wall towards Mill Creek.</li> <li>• Due to the limited extent of the turbid water plumes and the short durations of the November 13 bypasses, the on-site QEP assessed there to be a low risk of adverse impacts to the receiving environment.</li> </ul>	<p>External agencies were notified. The following corrective actions were implemented:</p> <ul style="list-style-type: none"> <li>• FST 4 sump area: Non-contact runoff from the FST sump was redirected to Outfall-13. An additional 6" pump was added to the FST sump to increase pumping capacity.</li> <li>• Area 1/4100 (Outfall-1): Conduit boxes were sealed to prevent water from flowing through open utility conduit. A formal sump and pump system was installed in the Floatel 2 utility construction area to manage stormwater runoff accumulations. The water management plan decision framework for managing contact water storage capacity was reviewed and updated.</li> <li>• Area 1/4100 (Ro-Ro Barge Ramp): The access road was graded towards the construction site to direct water away from the marine shoreline. The water management plan decision framework for managing contact water storage capacity was reviewed and updated.</li> <li>• Area 2/4100 (West Barge Ramp): At approximately 09:00, pumping of the sump to the West Sedimentation Pond was initiated and overflow from the sump ceased shortly thereafter. A permanent berm was constructed at the top of the barge ramp to control erosion and redirect water flow away from ramp and to the contact water management system.</li> <li>• Area 3/4200: A berm was installed along the sump to increase height and reduce surface flow</li> </ul>

Date	Type	Incident Description	Corrective Action
			<p>towards the utility culvert. The inlet of the utility culvert was raised to prevent runoff from entering the culvert. The water management plan decision framework for managing contact water storage capacity was reviewed and updated.</p> <ul style="list-style-type: none"> <li>• Upper 4100: Additional rock from the upper 4100 Ditch was removed. The water management infrastructure was updated to intercept and convey non-contact flows from the upper 4100 Area to the lower 4100 Ditch.</li> <li>• 1300 area: An additional 3" submersible pump was permanently installed into the depression where the runoff accumulates to provide surge capacity during intense rainfall.</li> </ul>
2025-11-16	Marine Unidentified Hydrocarbon Sheen	A small hydrocarbon sheen (<100 mL) was observed in the marine environment between the Dynamic Beast, Pluto, and L6001 barges, with no source identified following inspections of nearby barges and equipment.	Crews deployed spill response measures to contain the sheen within the work area and skim residual product from the water surface. External agencies were notified.
2025-11-16	Release	Approximately 0.01 L of residual diesel entered Howe Sound from barge GC197 after rainfall mobilized previously spilled diesel that had not been fully cleaned from the deck. The total spill volume was approximately 0.03 L, with the source traced to residual diesel from an earlier refueling activity.	Crews deployed spill booms around GC197 and GC191, placed booms around the generator, and installed spill pads and booms along the portside edge of GC197 to contain and absorb the diesel. External agencies were notified.
2025-11-20	Marine Unidentified Hydrocarbon Sheen	Approximately 0.1 L of unknown hydrocarbon was observed in the marine environment on the east side of the 4301 dock, with no source identified following vessel inspections.	A joint TAC and BCML skiff response deployed spill materials to absorb the hydrocarbon, and all used materials were disposed of in designated hazardous waste bins. External agencies were notified.
2025-12-05	Marine Unidentified Hydrocarbon Sheen	Approximately 0.1 L of hydrocarbon was observed on the starboard side of the Isabelle X. The source was unknown.	Crews deployed booms and removed contaminated materials. External agencies were notified.
2025-12-05	Release	Approximately 0.5 L of hydraulic fluid spilled into the marine environment from a failed hydraulic fitting on Spudnik during rotator movement.	Crews deployed punts and booms to contain the sheen, cleaned residual fluid, and inspected equipment to prevent further leaks. External agencies were notified.

Date	Type	Incident Description	Corrective Action
2025-12-08	Release	On December 8, 2025, at approximately 12:30 PM during heavy rainfall, an estimated 0.08 L hydrocarbon sheen was observed during offloading at the east barge ramp, with a small portion entering Howe Sound. The source was unknown, and vehicle inspections identified no leaks.	Spill response were implemented, including deploying booms, absorbent pads, spill socks, and sandbags to contain and control the sheen.
2025-12-12	Release	On December 12, 2025, at 10:08AM, a crew was refueling a punt when 0.075L of gasoline was released to the marine. Gasoline was transferred from a jerry can into the vessel's fuel reservoir. The jerry can in use was not equipped with a flow control or leak-stop mechanism, which resulted in fuel entering the reservoir at a higher rate than anticipated. This led to a brief overflow ("burp") of gasoline from the fuel fill point.	External agencies were notified.
2025-12-13	Release	On December 13, 2025, at 11:15AM, approximately 0.25L of biodegradable hydraulic oil was released from the rotator within the M05A moonpool in the marine. Environmental personnel were notified and attended the area. No sheen was observed outside of the moonpool.	The rotator was inspected by a mechanic, and it was determined there was a code 62 flange fitting O-ring failure. External agencies were notified.
2025-12-13	Release	On December 13, 2025, at 12:46AM, environmental personnel were informed of an estimated 0.2L hydrocarbon sheen within the marine environment near MS03. Upon notification, environmental personnel reviewed tidal conditions and confirmed that the tide was rising and approaching high tide at the time of observation. An organic sheen field test was conducted, and results indicated that the sheen was not fully organic.	An inspection was then conducted on barge perimeters, decks, and equipment on all barges in the vicinity. No source was determined during these inspections. External agencies were notified.
2025-12-15	ESC	<p>On December 15th during an atmospheric river high intensity rainfall event, Emergency Discharge Conditions requiring discharge of potentially non-compliant effluent to Howe Sound from East and West Sedimentation Ponds to prevent an uncontrolled bypass. Discharge under emergency operations proceeded over 15 - 17 December 15 to 17, 2025. The Contractor QP's Wastewater Treatment Discharge Sampling Standard Operating Procedure requires daily in situ and analytical sampling of discharge regulated under the WDA and associated IDZs during emergency discharge procedures. Daily monitoring results showed non-compliant effluent quality on December 15 only, with concentrations of TSS, T-Cu, T-Zn, and T-V exceeding the PE-111578 discharge limits at SP-E-OUT, and concentrations of TSS, T-Cu, and T-Zn exceeding the discharge limits at SP-W-OUT.</p> <p>In addition, the 4200 non-contact ditch was observed to be overflowing around 4 am on December 15 during intense rainfall. The overflow washed down the maintenance road and over the road edge to the 4200-collection sump. The excess water in the 4200-collection sump spilled onto the surrounding area and flowed through a utility culvert to the marine shoreline where it entered Howe Sound (Area 3). The 4200 non-contact ditch overflow was re-directed along the road to a lower portion of the 4200 non-contact ditch and discharged to Mill Creek via Outfall 06 (station OUT-06).</p>	<p>External agencies were notified. Corrective Actions for East and West Sedimentation Pond Discharges:</p> <ul style="list-style-type: none"> <li>• Daily water quality monitoring at SP-E-OUT was completed from December 15 – 17. The monitoring results were evaluated and indicate the residual sediments were flushed from the pipeline on December 15 and are no longer a source of TSS.</li> <li>• Receiving environment samples were collected December 15 – 17 within the initial dilution zone (IDZ) of East and West Sedimentation Ponds and at marine reference stations to evaluate potential impact to the receiving environment from the December 15 discharge.</li> <li>• The water treatment plant operator has investigated the use of a coarser</li> </ul>

Date	Type	Incident Description	Corrective Action
			<p>filtration sand that would reduce the frequency and duration of backflushes required during system operation, thereby increasing the 2700GPM processing capacity. Field trials conducted by the treatment plant operator have confirmed that coarser sand produces clarified effluent that meets discharge limits and WQGs at flow rates approaching the design capacity (14,700 m<sup>3</sup>/day). The sand filters in the six treatment trains of the 2700GPM system are planned to be upgraded with coarser sand in early 2026.</p> <p>Corrective Actions for the 4200 Bypass:</p> <ul style="list-style-type: none"> <li>On December 15 the following actions were immediately implemented: the culvert inflow interception and pump around system was modified by repositioning the 6" intake pump to remove the blockage and increase flows through this system; Berms were installed to re-direct the culvert inlet overflow to a lower section of the 4200 ditch. This stopped flows to the 4200 sump but resulted in contact water discharge at station OUT-06; and the dewatering capacity for the 4200 sump was doubled by adding a second 6" pump to increase water transfer to the West Sedimentation Pond and prevent overflow from this sump. Once rain subsided, debris from the culvert inlet was cleared and passive inflow to the culvert was restored.</li> <li>Receiving environment samples were collected along the Howe Sound</li> </ul>

Date	Type	Incident Description	Corrective Action
			<p>foreshore of Marine Area 3 and from Mill Creek and the 4200-diversion ditch outlet (OUT-06).</p> <ul style="list-style-type: none"><li>• The 300 mm diameter culvert will be replaced with a larger diameter culvert (500 mm) or a riprap armored ditch with the same capacity as a 600 mm pipe to increase the flow capacity at this section of the ditch, and to reduce the potential for overflow moving forward.</li></ul>

# Appendix C

## Water Quality Exceedances

Table 2 Summary of Freshwater and Estuarine Water WQG Exceedances for the 2025 Monitoring Program

Parameter	Units	WQG (LT)	N	N > WQG	Commentary
Field pH	pH units	6.5 - 9.0 (FWAL); 7.0 - 8.7 (EWAL)	3,268 (FWAL) 1,110 (EWAL)	310 (FWAL) 613 (EWAL)	Field pH measured in freshwater and estuarine water samples were occasionally below the lower limit of the FWAL and EWAL guidelines, respectively; however, values were within the pre-construction baseline ranges or within ranges observed at background stations in the creeks and are therefore not considered exceedances attributable to the project.
Field Dissolved Oxygen (DO)	mg/L	>=9.5 (FWAL); >=8 (EWAL)	114 (FWAL) 37 (EWAL)	0 (FWAL) 1 (EWAL)	Field DO measured in the Mill Creek estuary (SW-03) was below the lower limit of the EWAL guideline on November 27 (7.19 mg/L). The value was below the lower limit of the pre-construction baseline range at the Mill Creek estuary (9.39 mg/L) and below the minimum value observed at the background station in Mill Creek (station SW-07; 10.19 mg/L). This is an isolated occurrence, and it is not considered to indicate there is on-going influence from construction activities.
Fluoride	mg/L	0.12	118 (FWAL) 40 (EWAL)	19 (FWAL) 0 (EWAL)	Fluoride concentrations were 1.0 to 2.6 times greater than the FWAL guideline for samples collected from East Creek from April to December 2025. Follow-up investigations indicate there was limited LNG facility construction activity along the lower tributary of East Creek and that the fluoride concentrations were elevated on East Creek outside and upstream of the CPA
Total Aluminum (Al)	mg/L	0.033-1.8 <sup>1</sup> (FWAL)	118 (FWAL) 40 (EWAL)	43 (FWAL) 0 (EWAL)	Total Al concentrations were 1.1 to 14.4 times greater than the corresponding FWAL guidelines for samples collected from Mill Creek, East Creek and Woodfibre Creek stations; however, values were generally within those observed in the pre-construction baseline monitoring program at Mill, East and Woodfibre Creek or within those observed at background stations in the creeks and are therefore not considered exceedances attributable to the project. Total Al concentrations outside baseline and background ranges are as follows: <ul style="list-style-type: none"> <li>Total Al concentrations were 1.4 to 4.1 times greater than the FWAL guidelines for samples collected from Mill Creek on February 19, March 27 and November 6. Moderate levels of turbidity (1.35 to 6.60 NTU) and TSS (4.7 to 7.4 mg/L) were observed in the Mill Creek samples collected February 19, March 27 and November 6, and the total Al exceedances are attributed to particulate-bound forms of the metals. This is an isolated occurrence, and it is not considered to indicate there is on-going influence from construction activities.</li> <li>Total Al concentrations were 2.9 to 14.4 times greater than the FWAL guideline for samples collected from East Creek on February 21, August 15, November 13. Exceedances of total Al in East Creek on February 21, August 15, November 13 are attributed to high TSS in the samples due to heavy stormwater runoff across the project site during heavy rains.</li> <li>Total Al concentrations were 1.1 times greater than the FWAL guideline for samples collected from East Creek on August 5 and September 11. Exceedances for total Al on August 5 and September 11 are attributed to moderate to high TSS in the samples.</li> <li>The total Al concentration was 1.9 times greater than the FWAL guideline for a sample collected from Woodfibre Creek on November 13. Aluminum was present as both the particulate-bound and dissolved form of the metal. Although turbidity and TSS were detected at low concentrations (1.3 NTU and 3.7 mg/L, respectively), it is speculated that heavy runoff flows into Woodfibre Creek due to heavy rain on November 13 contributed to the measured total aluminum concentrations in the Woodfibre Creek sample.</li> </ul>
Total Cadmium (Cd)	mg/L	0.000036-0.00015 <sup>1</sup> (FWAL)	118 (FWAL) 40 (EWAL)	2 (FWAL) 0 (EWAL)	Total Cd measured in samples collected from East Creek (SW-04) on August 15 and November 13 were both 1.2 times greater than the FWAL guideline. Significant rainstorms occurred on August 15 and November 13 resulting in heavy stormwater runoff across the project site. The total Cr exceedances in East Creek can be attributed to elevated TSS (64 and 31 mg/L) in the samples.
Total Chromium (Cr) <sup>2</sup>	mg/L	0.001 (FWAL)	118 (FWAL) 40 (EWAL)	7 (FWAL) 0 (EWAL)	Total Cr measured in samples collected from East Creek (SW-04) were 1.4 to 3.6 times greater than the FWAL guideline. Exceedances of total Cr in East Creek on February 21, May 14, and August 15 are attributed to elevated TSS in the samples due to heavy stormwater runoff across the Project site during significant rainstorms. Exceedances for total Cr on September 11 can be attributed to elevated TSS (10.4 mg/L) in the sample. Total Cr concentrations above the FWAL guideline in East Creek on April 24, May 8, and May 12, with values up to 2.4 times greater than the FWAL guideline, are not attributable to elevated TSS in the samples. This is an isolated occurrence, and it is not considered to indicate there is on-going influence from construction activities.
Total Iron (Fe)	mg/L	0.3 (FWAL)	118 (FWAL) 40 (EWAL)	8 (FWAL) 0 (EWAL)	Total Fe concentrations were 1.1 to 17.1 times greater than the FWAL guideline for samples collected from East Creek and Mill Creek. Samples collected from East Creek on February 21, August 15, September 11, October 12 and November 13 are attributed to moderate to elevated TSS in the samples (8.8 to 63.6 mg/L). Samples collected January 23 and October 17 from East Creek cannot be associated with elevated TSS. This is an isolated occurrence, and it is not considered to indicate there is on-going influence from construction activities. The total Fe concentration was 1.7 times greater than the FWAL guideline for the samples collected from Mill Creek on February 19. The total Fe concentration is predominately in the particulate-bound form of the metal and is attributed to moderate TSS in the sample (4.7 mg/L). This is an isolated occurrence, and it is not considered to indicate there is on-going influence from construction activities.
Dissolved Copper (Cu)	mg/L	0.00020-0.019 <sup>1</sup> (FWAL)	118 (FWAL) 40 (EWAL)	32 (FWAL) 0 (EWAL)	Dissolved Cu concentrations were 1.1 to 9.6 times greater than the corresponding FWAL guidelines for samples collected from all freshwater stations. Values were within those observed in the pre-construction baseline monitoring program or within those observed at background stations in the creeks and are therefore not considered exceedances attributable to the project, with the exception of a discrete sample collected from East Creek. A sample collected from East Creek on November 13 was above the maximum value observed in the pre-construction baseline monitoring program at East Creek (0.00105 mg/L) and above the maximum background concentration in East Creek (station SW-09; 0.00123 mg/L). It is speculated that the high volumes of background runoff from a significant rainstorm increased to the total load of copper into East Creek resulting in higher concentrations of both total and dissolved copper.

Notes:  
CCME = Canadian Council of Ministers of the Environment.  
ECCC = Environmental and Climate Change Canada.  
WQG = CCME Canadian Water Quality Guidelines for the Protection of Aquatic Life, or the Federal Water Quality Guidelines published by ECCC. LT = long-term freshwater aquatic life guideline. For the 2025 dataset, variable dependent guidelines were calculated for each sample using sample specific parameter values. The nearest boundary value was used if a variable was outside the formula range.  
N = number of samples  
Non-detect results are screened using the detection limit value.  
<sup>1</sup> A range for long-term WQGs is provided since guidelines were calculated on a sample specific basis.  
<sup>2</sup> WQG for total chromium is not specified; therefore, the guideline value for hexavalent chromium was used for screening. The guideline value for trivalent chromium is 0.0089 mg/L.

Table 3 Summary of Marine Water WQG Exceedances for the 2025 Monitoring Program

Parameter	Units	WQG (LT)	Location	N	N > WQG	Commentary
Field pH	pH units	7.0 – 8.7	0.5 m Below Surface	83	2	Field pH was above the upper limit of the WQG in samples collected at 0.5 m (n=2) below the water surface in May and was below the lower limit of the WQG in a sample collected at 2 m (n=1) below the water surface, also in May. Although the field pH values observed at 0.5 m below the surface were below the range of background field pH observed at marine reference stations, this is an isolated occurrence, and it is not considered to indicate there is on-going influence from construction activities. Field pH observed in the sample collected at 2 m below the surface was within ranges observed in the pre-construction baseline monitoring program and within ranges observed at marine reference stations and are therefore not considered exceedances attributable to the project.
			2 m Below Surface	3,457	1	
			2 m Above Seafloor	3,347	0	
Field Dissolved Oxygen (DO)	mg/L	≥8.0	0.5 m Below Surface	72	6	Field DO levels were below the WQG lower limit in most deep water samples and occasionally in shallow water samples. Low concentrations of dissolved oxygen are indicative of influence from the deeper saline waters in the northern basin of Howe Sound and are a natural condition of the marine water in the CPA.
			2 m Below Surface	72	19	
			2 m Above Seafloor	72	69	
			Mill Creek Estuary	39	1	Field DO measured in the Mill Creek estuary (SW-03) was below the lower limit of the EWAL guideline on November 27 (7.19 mg/L), this is attributed to possible influence from deeper saline water entering the estuary.
Total Chromium (Cr) <sup>1</sup>	mg/L	0.0015	Mill Creek Estuary	40	1	Total Cr was not detectable in all of the Mill Creek estuary monitoring samples; however, a raised detection limit (<0.0025 mg/L) was 1.7 times greater than the WQG for the sample collected September 6. The corresponding hexavalent Cr concentration was below the detectable limit (<0.0005 mg/L) in the September 6 sample and met the WQG; therefore, the WQG is considered met.
Total Hexavalent Chromium	mg/L	0.0015	0.5 m Below Surface	83	2	Total hexavalent Cr was not detectable in all of the marine water monitoring samples; however, occasional raised detection limits (<0.0025 and <0.0050 mg/L) were 1.7 and 3.3 times greater than the WQG, respectively. For all of the samples with raised detection limits, the corresponding total Cr concentrations, which would include hexavalent Cr species, ranged from <0.00050 to 0.00051 mg/L and met the WQG; therefore, the WQG for hexavalent Cr is considered met.
			2 m Below Surface	89	4	
			2 m Above Seafloor	80	5	

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 ECCC = Environmental and Climate Change Canada.  
 WQG = CCME Canadian Water Quality Guidelines for the Protection of Aquatic Life, or the Federal Water Quality Guidelines published by ECCC. LT = long-term marine aquatic life guideline.  
 N = number of samples.  
 Non-detect results are screened using the detection limit value.  
<sup>1</sup> WQG for total chromium is not specified; therefore, the guideline value for hexavalent chromium (0.0015 mg/L) was used for screening. The guideline value for trivalent chromium is 0.056 mg/L.

Table 4 Summary of Marine Water WQG Exceedances for the 2025 In-Marine Works Monitoring Program

Parameter	Units	WQG (LT)	N	N > WQG	Commentary
Field pH	pH units	7.0 – 8.7	5,179	5	Field pH was infrequently below the lower limit of the WQG in shallow water samples collected between 0.1 and 6 m below the water surface. Surface waters in the near-shore environment are likely influenced by freshwater inputs with lower pH.
Field Turbidity	NTU	A change of 8 NTU from background conditions for short-term exposure (24-hour period)	5,169	4	Field turbidity was infrequently above the WQG in shallow water samples collected between the surface and 0.5 m below the water surface. These were isolated occurrences that occurred on single day increments.

## Notes:

CCME = Canadian Council of Ministers of the Environment.

ECCC = Environment and Climate Change Canada.

WQG = CCME Canadian Water Quality Guidelines for the Protection of Aquatic Life, or the Federal Water Quality Guidelines published by ECCC. LT = long-term marine aquatic life guideline.

N = number of samples.

Non-detect results are screened using the detection limit value.

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Table 5 Summary of Marine Sediment SQG Exceedances for the 2025 Monitoring Program

Parameter	Units	CCME Guideline	N	N > ISQG	N > PEL	Commentary	
Total Arsenic	mg/kg	7.24 (ISQG); 41.6 (PEL)	48	12	0	<ul style="list-style-type: none"> <li>Total As concentrations are up to 2.6 times greater than the ISQG value.</li> <li>Total Cu most frequently shows concentrations above the SQG. T-Cu concentrations are up to 22.1 times and 3.8 times greater than the ISQG and PEL values, respectively.</li> <li>Total Pb concentrations are up to 7.7 times and 2.1 times greater than the ISQG and PEL values, respectively.</li> <li>Total Hg concentrations are up to 4.1 times greater than the ISQG value.</li> <li>Total Zn concentrations are up to 1.9 times greater than the ISQG value.</li> </ul>	
Total Copper	mg/kg	18.7 (ISQG); 108 (PEL)	48	48	7		
Total Lead	mg/kg	30.2 (ISQG); 112 (PEL)	48	13	4		
Total Mercury	mg/kg	0.13 (ISQG); 0.7 (PEL)	48	10	0		
Total Zinc	mg/kg	124 (ISQG); 271 (PEL)	48	7	0		
Acenaphthene	mg/kg	0.00671 (ISQG); 0.0889 (PEL)	35	35	21	<ul style="list-style-type: none"> <li>PAH concentrations are elevated above the ISQG and/or PEL in the majority of marine sediment samples tested for PAHs (n=35).</li> <li>PAH concentrations are up to 1,682 times greater than the corresponding ISQG value and up to 77.5 times greater than the corresponding PEL value.</li> <li>Marine sediment samples collected from IDZ-W show PAH concentrations up to 29.4 times greater than the samples collected from IDZ-E. Of the PAHs, concentrations for acenaphthene, anthracene, fluoranthene and fluorene are most notably higher in the IDZ-W samples relative to the IDZ-E samples (&gt;20 times).</li> </ul>	
Acenaphthylene	mg/kg	0.00587 (ISQG); 0.128 (PEL)	35	35	8		
Anthracene	mg/kg	0.0469 (ISQG); 0.245 (PEL)	35	31	14		
Benzo(a)anthracene	mg/kg	0.0748 (ISQG); 0.693 (PEL)	35	32	14		
Benzo(a)pyrene	mg/kg	0.0888 (ISQG); 0.763 (PEL)	35	30	8		
Chrysene	mg/kg	0.108 (ISQG); 0.846 (PEL)	35	31	14		
Dibenz(a,h)anthracene	mg/kg	0.00622 (ISQG); 0.135 (PEL)	35	32	4		
Fluoranthene	mg/kg	0.113 (ISQG); 1.494 (PEL)	35	34	13		
Fluorene	mg/kg	0.0212 (ISQG); 0.144 (PEL)	35	33	15		
2-Methylnaphthalene	mg/kg	0.0202 (ISQG); 0.201 (PEL)	35	28	8		
Naphthalene	mg/kg	0.0346 (ISQG); 0.391 (PEL)	35	33	10		
Phenanthrene	mg/kg	0.0867 (ISQG); 0.544 (PEL)	35	32	13		
Pyrene	mg/kg	0.153 (ISQG); 1.398 (PEL)	35	30	14		
Aroclor 1254	mg/kg	0.0633 (ISQG); 0.709 (PEL)	16	1	0		<ul style="list-style-type: none"> <li>Concentrations of Aroclor 1254 were below detection limit in all marine sediment samples except for two samples. The marine sediment sample collected in the west IDZ showed a detectable concentration that was 1.6 times greater than the CCME ISQG value.</li> <li>Concentrations of total PCBs were below detection limit in all marine sediment samples, except for one sample. However, detection limits are up to 4.3 times greater than the ISQG value. The marine sediment sample collected in the west IDZ, where total PCB was reported as detected, showed a concentration that was 5.8 times greater than the ISQG value.</li> </ul>
Total Polychlorinated Biphenyls (PCB)	mg/kg	0.0215 (ISQG); 0.189 (PEL)	16	16	0		
PCDD/F TEQ Lower Bound	ng/kg	0.85 (ISQG); 21.5 (PEL)	35	35	11	<ul style="list-style-type: none"> <li>Lower-bound and upper-bound PCDD/F TEQ concentrations in all samples were up to 60 and 67 times, respectively, greater than the CCME ISQG value, and up to 2.4 and 2.6 times, respectively, greater than the CCME PEL value.</li> </ul>	
PCDD/F TEQ Upper Bound	ng/kg	0.85 (ISQG); 21.5 (PEL)	35	35	12		

Notes:

CCME = Canadian Council of Ministers of the Environment

ISQG = Interim Sediment Quality Guidelines

PEL = Probable Effects Levels

N = number of samples

Polychlorinated dibenzo-*p*-dioxins (PCDDs) and polychlorinated dibenzofurans (PCDFs) are typically evaluated for toxicity and the individual parameter concentrations are converted to toxic equivalent (TEQ) values that are summed and reported as a single PCDD/F TEQ parameter. A "lower-bound PCDD/F TEQ" is calculated assuming a concentration of zero for results reported as not detected, therefore, if all 17 of the individual compounds in the sub-set are not detected the lower-bound PCDD/F TEQ will equal zero. An "upper-bound PCDD/F TEQ" is calculated assuming a concentration equal to the detection limit for results reported as not detected.