



Environmental Protection Operations Directorate
Pacific and Yukon Region
101 - 401 Burrard Street
Vancouver, BC
V6C 3R2

December 19, 2022

CIAR: 80060
ECPT: 13-1201

Impact Assessment Agency of Canada
160 Elgin Street
Ottawa, Ontario K1A 0H3

Re: Woodfibre LNG – Environment and Climate Change Canada’s comments on the Draft Analysis of Proposed Changes to the Woodfibre LNG Project Decision Statement Conditions

On November 17, 2022, the Impact Assessment Agency of Canada (the Agency) commenced a public comment period for the Woodfibre LNG Project (the Project) on the Agency’s draft Analysis Report and the proposed changes to conditions listed in the Decision Statement.

Environment and Climate Change Canada (ECCC) initially provided comments to the Agency on August 11, 2022, regarding proposed changes to condition 6.4. ECCC has reviewed the draft Analysis Report (dated November 2022) and for the Agency’s consideration, is providing comments (Attachment 1) to further clarify ECCC comments previously submitted in August.

In addition, ECCC recommends the Agency consider seeking advice from Health Canada on proposed changes to condition 6.4, with respect to human health.

Please note that ECCC is providing technical, science-based information and knowledge, pursuant to its mandate¹, to inform the assessment of the Project’s potential effects in the receiving environment and on valued ecosystem components. The information provided by ECCC has been prepared based upon the Project documentation made available to date. Should changes occur to the proposed Project, ECCC’s advice may need to be revised. Any information or comments received from ECCC in this context does not relieve Woodfibre LNG Limited (the Proponent) of its obligations to respect all applicable federal Acts and regulations.

If you have any questions, please contact me at kathryn.marshall@ec.gc.ca.

Regards,

Kathryn Marshall
Senior Environmental Assessment Officer
Environment and Climate Change Canada / Government of Canada

Attachment 1: Environment and Climate Change Canada’s comments on the Draft Analysis of Proposed Changes to the Woodfibre LNG Project Decision Statement Conditions

¹ <https://www.canada.ca/en/environment-climate-change/corporate/transparency/acts-regulations/acts-administered.htm>

Attachment 1: Environment and Climate Change Canada’s comments on the Draft Analysis of Proposed Changes to the Woodfibre LNG Project Decision Statement Conditions

Section	Page #	Comment/ Issue Description
2.2 Proposed Changes to Condition 6.4: Views Expressed	p. 9	<p>ECCC recommends the following sentences be removed on page 9:</p> <ol style="list-style-type: none"> 1. <i>“Environment and Climate Change Canada (ECCC) advised the Agency that the proposed changes to condition 6.4 to clarify exceedances attributable to the Project are not expected to increase the extent to which the effects of the Project, as assessed during the environmental assessment, are adverse.”</i> 2. <i>“ECCC also asked how the proponent would determine whether guideline exceedances are attributable to the Project or not.”</i> <p>ECCC did not advise the Agency that the proposed changes would not increase the extent of the effects, and did not ask how the Proponent would determine if exceedances are attributable to the Project.</p>
2.2 Proposed Changes to Condition 6.4: Views Expressed	p. 9	<p>ECCC recommends the following edits (additions in bold and deletions in strikethrough), for clarity and to better reflect the intention of ECCC’s previous comments:</p> <p><i>“However, ECCC recommended that condition 6.4 clearly state that monitoring must occur during all Project phases, not only during construction and operation. Project activities during decommissioning and closure could also affect water and sediment quality and therefore these activities should also be monitored. Further, ECCC recommended the phrase “or reduce the associated risk to human health” be removed from the proponent’s suggested language change, since inclusion of the phrase could allow for as this would allow the Project to contaminate water and sediment, as long as the risk to humans health is managed. ECCC noted understood the intent of the original condition was to protect water and sediment quality for future human use. If the Project contaminates water or sediment, the proponent could reduce risk to human health by prohibiting humans from using the water (for example, by closing beaches for swimming or by prohibiting fish and shellfish consumption), instead of mitigating the source of the contamination. If the phrase is not deleted, ECCC is of the opinion that condition 6.4 would could allow water and sediment quality to deteriorate as a result of the Project.”</i></p>

Section	Page #	Comment/ Issue Description
2.2 Proposed Changes to Condition 6.4: Agency's Analysis and Conclusions	p. 10	<p>ECCC recommends the following sentence be removed on page 10:</p> <p><i>“The proponent and ECCC agree monitoring for only the effects to water and sediment quality that are attributable to the Project during construction and operation would not result in additional adverse effects.”</i></p> <p>ECCC did not state that monitoring for effects that are attributable to the Project during construction and operation would not result in additional adverse effects. ECCC notes that monitoring alone does not prevent effects from occurring.</p>
2.2 Proposed Changes to Condition 6.4: Agency's Analysis and Conclusions	p. 10	<p>ECCC recommends the following changes (additions in bold and deletions in strikethrough) for accuracy and to better reflect the intention of ECCC's previous comments:</p> <p><i>“According to ECCC, limiting monitoring of effects mitigation measures to only those affecting that reduce associated risk to human health would could allow the potential contamination of water to the point where fish and shellfish may no longer be safe to consume, or where the waters may no longer be safe for swimming. If this happens, a prohibition to use contaminated waters may have to be implemented proponent to use administrative controls to prevent human exposure to contamination instead of preventing contaminants from entering the environment. For example, the proponent could prohibit the consumption of contaminated fish instead of mitigating the source of contamination.”</i></p> <p>Additionally, for context, ECCC notes the guidelines referenced in condition 6.4 as a benchmark for monitoring, are for the protection of aquatic life, and are not appropriate for the protection of human health.</p>