

## **Ksi Lisims LNG**

The following comments have been provided by Indigenous Services Canada (ISC) regarding the Initial Project Description (IPD) for the Ksi Lisims LNG proposed by Nisga'a Nation, Rockies LNG LP and Western LNG LLC.

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<b>Comment #:</b>	<b>Page #:</b>	<b>Section:</b>	<b>Original:</b>	<b>Suggested Amendment:</b>
ISC-01	Viii	Regulatory and Policy Content	General Comment	It may be of importance to elaborate a bit more on how the Proponent(s) will work towards achieving the goals set out by the First Nations Climate Initiative. What steps will be taken in order to ensure goals are met/on track?
ISC-02	2	1.0 Introduction	The actual power transmission line connection from the BC Hydro sub-station to the Site will be designed, developed, owned and operated by a third party not under the care and control of the Proponent.	It would be helpful to know whether these ancillary works will occur on federal, provincial or Indigenous lands (i.e., whether it will intersect with any reserve boundaries). This information could help regulators determine if there may be additional permitting required.
ISC-03	10	2.2.3 Natural Gas Receiving Facility	The Project will be supplied with pipeline grade natural gas from the WCSB that will be transported to the Site by an approximately 600-km long natural gas transmission pipeline built,	It would be helpful to know whether these ancillary works will occur on federal, provincial or Indigenous lands (i.e., whether it will intersect with any reserve boundaries). This information could help regulators determine if there may be additional permitting required.

			operated, and owned by a third party.	
ISC-04	10	2.2.3 Natural Gas Receiving Facility	If located upstream of the feed gas pipeline, the amount of pre-treatment equipment located at the Site would be reduced.	If this is in reference to equipment to remove impurities, recommend adding info on the potential footprint and specifications, such as disposal requirements for operating offsite. Further to this, if there is a potential for equipment to be located offsite it would be helpful to know whether it would occur on federal, provincial, or Indigenous lands.
ISC-05	10	2.2.3 Natural Gas Receiving Facility	The refrigerant cooling systems are currently being designed so as not to discharge warm water into the marine environment nor to entrain fish or plankton in a seawater intake.	Recommend including a brief description of how this design aspect will work.
ISC-06	11	2.2.4 FLNG and LNG Production	Each FLNG will include electrically driven boil off gas compressors, which will recompress low pressure boil off gas from the LNG storage tanks and reintroduce it to the high-pressure inlet of the liquefaction process.	It is unclear what this process accomplishes - i.e., whether it prevents boil off gas from entering the environment. If this is the intent, recommend indicating this here.
ISC-07	13	2.3.2 Construction Workforce	General Comment	It would be beneficial to clarify whether or not potential employees/contractors which may take part in the Project will receive cultural sensitivity training or training related to GBA+ throughout sections

				<p>related to employment and training opportunities.</p> <p>Clarification regarding this aspect is often of great importance to those who belong to diverse subgroups such as youth, elders, those with disabilities and those belonging to the LGBTQIA2S+ community.</p>
ISC-08	14	2.3.2 Construction Workforce	The workforce will require certain specialized trades and expertise who will likely need to be sourced from elsewhere in BC, Canada or internationally.	It would be interesting to know whether there are synergies between local training institutes and project plans, which may provide opportunities for local workers to undertake specialized training to support construction and operations. If not, it could be an opportunity to conduct outreach with training institutes and/or develop a mentorship program for new graduates.
ISC-09	18	2.6 Decommissioning	Purging buried sub-sea floor pipelines of residual natural gas and leaving in place	It may be helpful to include some details as to why the buried sea floor pipelines would be left in place following decommissioning.
ISC-10	20	2.7.2 Operations	Emissions during decommissioning are expected to be similar to those associated with construction as both Project phases will rely on similar types of equipment.	This may be a good place to briefly describe the purging process involved in the removal of residual gas.
ISC-11	31	3.6 Biophysical Data and Reports	It is a reasonably current source of general marine biophysical information applicable to marine	It may be helpful to know whether any aspects of this report will need to be revisited/updated.

			waters potentially affected by the Project.	
ISC-12	44	5.3 Baseline Studies	Other studies addressing social, economic, community well-being, etc. are part of the baseline study plan but will not commence until after the DPD is under development as these study parameters will be informed by engagements with Indigenous Nations, regulatory authorities, regional and municipal governments, stakeholders and the public	<p>A potential source of information to support baseline study plans for socio-economic valued components is First Nations Information Governance Centre (FNIGC) <a href="https://fnigc.ca/">https://fnigc.ca/</a></p> <p>A potential source of information to support baseline study plans for health-related valued components is First Nations Health Authority (FNHA) <a href="https://www.fnha.ca/">https://www.fnha.ca/</a></p>
ISC-13	46	5.2 Potential Direct, Indirect and Cumulative Effects <i>and where applicable</i>	General Comment	<p>It may be beneficial to include the term “<i>cultural</i>” in addition to the standard list of concerns, values and impacts when discussing environmental, socio-economic, heritage and health components of the Project.</p> <p>The Cumulative Effects Assessment will examine residual environmental, <b>cultural</b> and socio-economic effects arising from the Project, together with the residual effects from past, existing, and reasonably foreseeable projects and activities in the Project area.</p>
ISC-14	51	Table 9 – Chapter 10, Paragraph 8(e) and 8(f) and	Existing and future economic well-being of Nisga’a citizen	If there are any potential training or apprenticeship opportunities, it may be helpful

		Associated Valued Components		to note this within the list of associated valued components
ISC-15	53	6.1 Nisga'a Treaty	General Comment regarding the following note:  <i>"Relatively recent socio-economic data pertaining to potential effects on the Nisga'a Nation have been collected during previous EAs (e.g., PRGT, WCGT, KSM Mine) and are available to aid in assessing the effects of the Project in accordance with paragraph 8(f) of Chapter 10.</i>	It may be beneficial to provide a more specific clarification regarding how recent the data pertaining to potential effects on Nisga'a Nation is.  Was the data all collected during the same time period? Was previous data also shared between EAs for PRGT, WCGT, KSM, etc...
ISC-16	80	7.4 Preliminary Assessment of Potential Impacts to Indigenous Nations Resulting from Project Activities and Alignment with Indigenous Nation Interests	Mitigation measures and appropriate management plans will be developed based on comments received from Indigenous Nations through the EA-IA process.	Although it indicates that mitigation measures will be based on comments received, it may be helpful to note whether engagement will continue throughout development and implementation of the mitigation measures.
ISC-17	90	9.1 Safety Philosophies	N/A	Given a number of Indigenous communities have been identified as having potential interest in the project as well as potential employment of local workers, recommend including the availability of emergency management and response information in local Indigenous languages.
ISC-18	N/A	N/A	General Comment	It may be of importance to note the potential for increased risk of adverse socio-economic impacts related to boom-bust cycles.

				<p>Note the following studies:</p> <ol style="list-style-type: none"><li>1. <a href="#">The social determinants of health impacts of resource extraction and development in rural and northern communities: A summary of impacts and promising practices for assessment and monitoring.</a> (Prepared for Northern Health and the Provincial Health Services Authority)</li><li>2. <a href="#">Indigenous Gender-based Analysis for Informing the Canadian Minerals and Metals Plan</a> (Native Women's Association of Canada)</li><li>3. <a href="#">A Literature Synthesis Report on the Impacts of Resource Extraction for Indigenous Women</a> (Canadian Research Institute for the Advancement of Women)</li></ol>
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