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Executive Summary

Ridley Island Energy Export Facility Limited Partnership submits these comments in response to the initial project description for the Trigon Pacific LPG Project filed on June 16, 2026.

Three core points underpin REEF LP's position:

- **Trigon has no right to export LPG.** Trigon's lease with PRPA does not permit LPG handling or export. PRPA has twice denied Trigon's requests to modify its lease. REEF LP holds exclusive rights to export LPG in the Port of Prince Rupert, which PRPA has publicly affirmed.

- **Trigon's approach is inefficient and futile.** Trigon has initiated both a s. 82 review (for a non-designated project) and now an impact assessment (for a designated project) for mutually exclusive LPG facilities on the same lands. Only one project could ever be constructed — and neither can without LPG rights.

- **The Trigon Project is not needed.** Existing and approved West Coast LPG infrastructure — including RIPET, Ferndale, the REEF Project, and the Pembina Terminal — already meets current and reasonably foreseeable demand. Adding Trigon's proposed capacity would overbuild egress by a minimum of 1.5 times, negatively impacting the export economy and Canadian consumers.

REEF LP also identifies significant technical deficiencies in the 2026 IPD, including: unduly narrow study area boundaries; failure to address site contamination; projected ground flare emissions six times the total facility emissions limit for the REEF Project with no reduction strategy; and internal inconsistencies regarding environmental effects.

I. Introduction

These comments are submitted by Ridley Island Energy Export Facility Limited Partnership ("**REEF LP**") in response to the initial project description for the Trigon Pacific LPG Project (the "**Trigon Project**") filed by Trigon Pacific Terminals Ltd. ("**Trigon**") on June 16, 2026 (the "**2026 IPD**").

REEF LP is a joint venture between subsidiaries of AltaGas Ltd. ("**AltaGas**") and Koninklijke Vopak N.V. ("**Vopak**").

REEF LP and Trigon are neighbouring tenants on Ridley Island in the Port of Prince Rupert, British Columbia. The Prince Rupert Port Authority ("**PRPA**") is landlord to both REEF LP and Trigon.

Trigon currently operates a bulk commodities marine terminal on Ridley Island and is primarily engaged in the storage and export of coal.

Trigon does not acknowledge the existing adjacent projects on Ridley Island in its 2026 IPD, but they are key components of the physical and economic context:

- REEF LP is currently constructing the Ridley Island Energy Export Facility (the "**REEF Project**"), a large-scale liquefied petroleum gas ("**LPG**")[1] and bulk liquids terminal, on Ridley Island.

- AltaGas and Vopak, via another joint venture (Ridley Island LPG Export Limited Partnership ("**RILE LP**")), jointly own the Ridley Island Propane Export Terminal ("**RIPET**") on Ridley Island, which is operated by AltaGas on Trigon's leased lands, pursuant to a sublease granted by Trigon. RIPET is Canada's first propane export facility.[2]

Further, ALA Energy, a subsidiary of AltaGas, operates the ALA Energy Ferndale Terminal ("**Ferndale**") in Washington state. Ferndale stores and exports LPG from Canada and US suppliers to both domestic and global markets.

II. Contextual timeline

The following is important context for REEF LP's submissions on the Trigon Project:

- **April 1, 2009**: Trigon's lease agreement with PRPA is amended to, among other things, modify the products which it is permitted to handle and export within the Port of Prince Rupert. Trigon is only permitted to handle and export coal, petroleum coke, anthracite, wood pellets, hydrogen, ammonia, and elemental sulphur (but not LPG).

- **August 1, 2015**: REEF LP (via its predecessor in interest Vopak) is granted time-limited exclusive rights to handle and export LPG and other bulk liquids in the Port of Prince Rupert by agreement with PRPA (the "**Exclusivity Rights**").

- **September 29, 2023**: Trigon requests PRPA's consent to modify Trigon's lease to permit it to handle and export LPG (the "**LPG Request**").

- **November 6, 2023**: PRPA denies Trigon’s LPG Request.

- **January 10, 2024**: Trigon requests that PRPA reconsider its refusal of the LPG Request (the "**Reconsideration Request**").

- **January 10, 2024**: Trigon provides PRPA with a project description for an LPG export facility located within the Port of Prince Rupert (the "**2024 PD**") and requests a review of the proposed project pursuant to s. 82 of the *Impact Assessment Act*.

- **May 23, 2024**: Trigon provides PRPA with another copy of the 2024 PD.

- **May 29, 2024**: AltaGas and Vopak reach a positive final investment decision on the REEF Project.

- **July 18, 2024**: PRPA refuses the Reconsideration Request.

- **July 19, 2024**: PRPA informs Trigon that it will not carry out a s. 82 review of Trigon's proposed LPG project on the basis that Trigon holds no rights to use its leased lands to handle and export LPG.

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[1] LPG includes propane and butane.

[2] Trigon refers to RIPET as an LPG terminal operating on Trigon's lands leased from PRPA. However, for clarity, Trigon does not own or operate this facility, and the LPG rights associated with RIPET are limited to the RIPET lands via a sublease and do not extend to the remainder of Trigon's lands.

- **October 30, 2025**: AltaGas and Vopak reach a positive final investment decision on the REEF Optimization 1 project ("**Opti 1**").

- **April 14, 2026:** AltaGas and Vopak receive regulatory approval for the REEF Optimization 2 project ("**Opti 2**").

III. Trigon has no right to handle or export LPG in the Port of Prince Rupert

In the 2026 IPD, Trigon states that the Trigon Project will be sited on lands leased from PRPA, and that "all land and water rights required for the project are currently under a lease agreement with the Prince Rupert Port Authority".[3] It further states that Trigon "currently handles" LPG[4] and makes numerous claims regarding the throughput, storage, and export capacity of the Trigon Project.

However, the 2026 IPD fails to mention that Trigon does not have the right to handle or export LPG within the Port of Prince Rupert pursuant to its lease, and that it has been unsuccessful in obtaining that right. Further, all LPG handled and/or exported from Trigon's leased lands is via the RIPET project by RILE LP (which again, is a joint venture of AltaGas and Vopak).

As noted above, REEF LP holds the Exclusivity Rights pursuant to its agreements with PRPA. PRPA has publicly affirmed these rights.[5] The Exclusivity Rights, and relatedly, Trigon's attempts to expand its rights to include LPG, are the subject of an ongoing British Columbia Supreme Court civil action brought by Trigon against PRPA (Vancouver Registry No. VLC-S-S-237527) (the "**Action**"). REEF LP is a defendant in the Action.

It has been made clear throughout the Action by both PRPA and REEF LP that PRPA cannot grant Trigon the right to handle or export LPG in the Port of Prince Rupert due to the Exclusivity Rights, as doing so would result in a breach of PRPA's agreements with REEF LP.

Despite Trigon's numerous claims about its ability to advance the Trigon Project, the fact remains that Trigon does not have and has been unsuccessful in obtaining the requisite rights to construct and operate the proposed project.

REEF LP notes that the *Impact Assessment Act* provides multiple junctures at which the Impact Assessment Agency of Canada ("**IAAC**") or the Minister of Environment may consider "any other factor" that the IAAC or the Minister considers relevant in their assessment of a designated project. In REEF LP's respectful submission, the proponent's lack of requisite property rights to construct and operate the proposed project and PRPA's inability to grant those rights without breaching its agreements with REEF LP are factors that the IAAC and the Minister ought to consider in any decision-making involving the Trigon Project.

IV. Trigon is attempting to initiate two separate regulatory processes for two mutually exclusive projects on the same parcel of land

REEF LP's understanding is that the *Impact Assessment Act* establishes two distinct streams for the review of projects:

[3] 2026 IPD, s. 2.3.
[4] 2026 IPD, s. 2.1.
[5] https://www.rupertport.com/wp-content/uploads/2023/11/2023.11.13-PRPA-AFFIRMS-COMMERCIAL-COMMITMENTS.pdf

1. impact assessments of "designated projects" (as prescribed by the *Physical Activities Regulations*) overseen by the IAAC; and

2. assessments of non-designated projects on federal lands by federal authorities.

As noted above, in 2024, Trigon requested that PRPA conduct a review of the 2024 PD pursuant to s. 82 of the *Impact Assessment Act*. The 2024 PD described an LPG export project to be located on Ridley Island. In the 2024 PD, Trigon stated conclusively that its proposed LPG project was not a "designated project" for the purposes of the *Physical Activities Regulations* promulgated under the *Impact Assessment Act*:

> The Project is not a 'Designated Project' under the IAA's (2019) Physical Activities Regulations. Since the Project is being entirely developed on a brownfield site using existing infrastructure, its impacts are expected to be localized with no significant effects anticipated. As such, the environmental aspects of the Project are expected to be assessed under Section 82 of the Impact Assessment Act (2019).

PRPA refused to conduct the requested s. 82 review. This refusal is the subject of an ongoing Federal Court judicial review commenced by Trigon (Federal Court File No. T-2097-24). Part of the relief Trigon seeks in that proceeding is a court order compelling PRPA to undertake a s. 82 review of the project proposed in the 2024 PD. If Trigon were to obtain the relief it seeks on judicial review, the resulting s. 82 review of the project described in the 2024 PD would proceed.

Now, in its 2026 IPD, Trigon proposes an LPG storage and export project in the exact same location on Ridley Island. This time, however, Trigon states that the project, with a proposed total of 158,000 m^3 of storage, "exceeds commodity storage thresholds set forth in the *Physical Activities Regulations* and as such, the environmental aspects of the Project are expected to be reviewed by federal authorities led by the Impact Assessment Agency of Canada."[6] With all phases combined, Trigon is now seeking an impact assessment of a designated project.

In effect, Trigon is seeking to pursue two mutually exclusive, concurrent assessment processes for two mutually exclusive projects on the same lands. Practically speaking, Trigon could only proceed with the construction and operation of one of these projects, if either is permitted.

Trigon's two-pronged approach is futile and an inefficient use of IAAC's time and resources. Trigon does not hold and cannot be granted the requisite rights to LPG in order to construct and operate <u>either</u> project, even if it were determined that the environmental effects associated with the Trigon Project were not likely to be significant.

V. The Trigon Project is not needed

a. Existing West Coast assets are sufficient to meet Canada's LPG needs

Existing and approved West Coast LPG export infrastructure — including RIPET, Ferndale, the REEF Project together with its approved optimization projects, and Pembina's Prince Rupert Terminal on Watson Island in the Port of Prince Rupert (the "**Pembina Terminal**") — already meets current and reasonably foreseeable demand.

[6] 2026 IPD, ss. 1 and 4.4.1.1.

Ferndale has been operational for decades. Ferndale currently sources approximately 40,000 bpd of LPG from Canada. RIPET has been operational since 2019 and currently exports approximately 81,000 barrels per day ("**bpd**").

The REEF Project is a large, well-advanced project. In 2022, the REEF Project received key determinations and permits from the Government of Canada and an environmental assessment certificate from the Government of British Columbia, and construction of the REEF Project is now more than 75% complete.

The REEF Project will deliver Canadian LPG to high-demand global markets. In the first phase ("**Phase 1**") and Opti 1 alone, the REEF Project is expected to provide 85,000 bpd of export capacity and 97,500 m^3 of nameplate LPG storage.

The joint venture partners of REEF LP already have experience offloading propane and butane at RIPET and Ferndale, which will make the transition to operating the REEF Project straightforward. Importantly, these existing export terminals are not currently at or near capacity but instead are planned to have their capacity filled over time – new infrastructure is <u>not</u> required to meet Canada's LPG export needs.

b. Trigon's statements about West Coast LPG exports are inaccurate

In its 2026 IPD, Trigon states that there remains a notable export capacity shortfall and that new infrastructure is required to balance market demand with supply. This is inaccurate. As mentioned above and shown in the below table, existing and approved infrastructure (RIPET, Ferndale, the REEF Project and its approved optimization projects, and the Pembina Terminal) already meets current and reasonably foreseeable supply growth in Canada. The incremental addition of Trigon's proposed project would overbuild West Coast egress capacity by a minimum of 1.5 times, negatively impacting the export economy by causing low productivity for existing Port of Prince Rupert infrastructure and negatively impacting consumers in Canada by bidding up local pricing.

Category	Estimated Amounts
2025 CER Reported Canadian LPG Exports	273,607 bpd
2025 Ontario and Eastern Canadian Exports	(51,485 bpd)
2025 Western Canadian LPG Exports	222,122 bpd (due to their geographic location, East Coast LPGs cannot economically be exported off the West Coast)
RIPET capacity	85,000 bpd
Ferndale capacity	70,000 bpd
Pembina's Watson Island capacity	25,000 bpd
REEF Phase 1 capacity	55,000 bpd
REEF Opti 1 capacity	30,000 bpd
REEF Opti 2 capacity	65,000 bpd

Trigon also states that "much of the LPG export capacity on the west coast of Canada is operated by a single company that manages a fully integrated supply chain from Edmonton through to Asia", which it opines "limits the ability of other companies with potentially more cost-effective logistics solutions to compete for market share".[7] REEF LP assumes that the "single company" that Trigon refers to is AltaGas. Trigon's statements are inaccurate. While AltaGas does own assets throughout the LPG value chain, only a minority of the LPG that flows to the West Coast of Canada is controlled end-to-end by AltaGas. In 2025, for example, this was approximately 27% of RIPET's export volume, while over 70 producers and aggregators in Canada send volume through the open-access RIPET terminal. As the REEF Project comes online, REEF LP expects the AltaGas percentage to decrease as third-party aggregators ramp up volumes. REEF LP expects a significant portion of third-party volumes from producers and aggregators will continue to export through RIPET and the REEF Project as incremental capacity is added.

Trigon claims that "with the lack of Canadian LPG export capacity over 200,000 B/D [200 kpbd] of Canadian LPG moves to the US which could be capturing higher market value"[8], presumably in Asia. According to the Canada Energy Regulator[9], however, in 2025 Canada exported 189 kbpd to the US. Of this amount, approximately 51 kbpd was exported from Ontario and eastern Canada. These barrels were largely produced in the Sarnia fractionation market, purposely built to serve eastern North American demand and located too far from the West Coast to economically export. Further, as cross-referenced with the US Energy Information Administration import data[10], approximately 39 kbpd of exports are sent by AltaGas via its subsidiaries to Ferndale for exporting to the US. After these, due to the geographic location of the Fort Saskatchewan fractionation hub (where LPGs are processed for sale) compared to the US hubs in Mont Belvieu, Texas and Conway, Kansas, a large portion of US imports goes to satisfy local demand in northwestern US states. These buyers will be able to pay high rates to secure supply and likely could not be displaced economically via West Coast exports. Between rail and truck exports, this amount is estimated at approximately 40 kbpd.

This leaves approximately 58 kbpd of volumes available, which will be exported by REEF Phase 1 and Opti 1 (which have a collective capacity of 85 kbpd). Supply growth of approximately 27 kbpd will be needed before REEF Phase 1 and Opti 1 are full. REEF Opti 2 will then be available. In short, there is no lack of Canadian LPG export capacity to meet the realistic volumes available for export to Asia.

c. Trigon's statements about its proposed project are inaccurate

Trigon states that the Trigon Project would "reduce systemic risk and improve resilience". REEF LP agrees that reducing systemic risk and improving resilience are important considerations. However, Trigon's claims that the Trigon Project would contribute to these goals are misleading. As described in the 2026 IPD, Trigon plans to use the same dock, loading, and rail infrastructure as RIPET. By contrast, other REEF LP and ALA Energy infrastructure has contributed to resiliency: the REEF Project adds a new dock and vessel berth location, and Ferndale is in an entirely different location on the West Coast. The Pembina Terminal is owned by a different entity and uses separate infrastructure from any of these projects.

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[7] 2026 IPD, s. 2.6.1.
[8] 2026 IPD, s. 2.6.3.
[9] https://apps.cer-rec.gc.ca/CommodityStatistics/Statistics.aspx?language=english
[10] https://www.eia.gov/petroleum/imports/companylevel/

Trigon describes the Trigon Project as "truly open access"[11], implying that other West Coast facilities are not. This is inaccurate. Both RIPET and the REEF Project are open-access facilities, in alignment with PRPA's mandate to enable trade in the Port of Prince Rupert.

VI. Technical issues with the Trigon initial project description

In addition to the broader issues identified above, REEF LP raises a number of technical issues with the 2026 IPD, organized by theme below.

a. Project scope and site conditions

- Trigon has purported to increase the storage capacity of its project by approximately 60% as compared to its 2024 proposal, but the anticipated throughput is the same. This discrepancy raises questions about whether the storage increase, which expressly would only occur in a second phase if demand can be shown, reflects a genuine change in project design or is primarily intended to cross the 100,000 m^3 threshold for designated projects and designated expansion projects under the *Physical Activities Regulations*.

- The proposed spatial boundaries for the assessment of potential adverse effects (Table 2-2 in the 2026 IPD) are unduly narrow. The Local Study Areas for vegetation and wildlife are limited to the project footprint, and the Regional Study Areas consist of only a 100 m buffer. These boundaries do not encompass potential direct or indirect project effects off site due to air emissions, noise, light, invasive species, vehicles, human presence, wastes, and accidents.

- The 2026 IPD states that the Trigon Project is proposed on brownfield lands previously used for coal storage and claims that the use of brownfield lands avoids or reduces potential environmental effects. However, the 2026 IPD does not provide any information about the existing conditions of soils and sediments within the footprint that would be disturbed for the Trigon Project. It is reasonable to assume, however, that the ground underlying the existing coal storage area may be contaminated by leachate from long-term coal storage. No site investigation or remediation is proposed in the 2026 IPD, and there is no discussion of the effects of site preparation or the risks of leaving the lands unremediated. Trigon does not appear to account for the potential costs of remediation.

b. GHG emissions and power supply

- Trigon estimates 655.1 kt CO_2/year in ground flare emissions alone. This is a high volume of emissions and raises concerns regarding a lack of flare minimization or poor facility design. By comparison, these emissions are six times the total facility emissions limit for the REEF Project. The 2026 IPD does not outline any emissions reduction strategies, nor does it include a credible net zero plan aligned with the Strategic Assessment of Climate Change framework.

- The 2026 IPD lists project components at s. 3.3.1 but does not include any components related to power generation. Trigon estimates that up to 13.5 MW will be required for on-site power, with the preferred source being BC Hydro, but acknowledges that “should insufficient power be available to operate the facility, the terminal may use alternative sources to drive compressors.” These alternative sources appear to include combustion of natural gas, the availability and potential effects of which are not adequately addressed.

[11] 2026 IPD, s. 1.

- The 2026 IPD does not clarify whether its GHG emissions estimate assumes that facility power will be provided by an electrical grid connection, as stated elsewhere in the document. If the estimate assumes grid power, it likely significantly understates the actual GHG emissions of the Trigon Project, as grid power is not currently available on Ridley Island at the capacity required.

c. Identification of potential effects

- The 2026 IPD is internally inconsistent in its identification and description of the Trigon Project's potential effects. For example, the 2026 IPD acknowledges that noise and light may impact marine and land-based wildlife but elsewhere states that the project will have no effect on the marine or terrestrial environment. The effects of accidents or malfunctions during operation are not consistently addressed.

VII. Reservation of rights

REEF LP respectfully requests that the IAAC consider the concerns set out in this submission in its review of the 2026 IPD and in any subsequent decision under section 16 of the *Impact Assessment Act*. REEF LP reserves the right to participate fully in all subsequent phases of the impact assessment process and to supplement these submissions as further information becomes available.