

LNG Canada Development Inc.
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Canada

January 31, 2019

Compliance and Enforcement
Environmental Assessment Office
PO Box 9426 Stn Prov Govt
Victoria, BC V8W 9V1

Via email: eao.compliance@gov.bc.ca

Re: LNG Canada Development Inc. (“LNG Canada”) Export Terminal Project, Schedule B, Environmental Assessment Certificate #E15-01 - Condition #1b Compliance Report

Condition #1b to Environmental Assessment Certificate (EAC) #E15-01 requires that:

The Holder must submit a report to EAO Compliance and Enforcement staff on the status of compliance with the Conditions of this Certificate, and the conditions in Schedule B, at the following times:

b. On or before January 31 in each year after the start of construction;

Therefore, please find enclosed the LNG Canada Annual Status of Compliance Report for the 2018 reporting year.

The following items of note are included on the attached report:

- On December 15, 2018, LNG Canada Environmental Monitors (EM) were completing regular maintenance on the outflow fish screen at the Workforce Accommodation Centre (WAC) stormwater pond when a large number of impinged fish were discovered. The fish screen was installed in 2017 to prevent coho from entering the stormwater pond. Approximately 4900 fish, all identified as three-spine stickleback (TSB), were recovered from the fish screen. The stormwater pond is inspected regularly as part of the EM program, and impingement is estimated to have taken place over a 24-48 hr period. Low water levels and ice formation, resulting in declining oxygen levels in the storm pond, likely caused the TSB to attempt to migrate out of the pond, subsequently becoming trapped in the fish screen. LNG Canada closed the stormwater pond valve to prevent flow out of the pond and further fish mortality and is managing water levels in the stormwater pond on an ongoing basis to prevent further issues. Fisheries and Oceans Canada (DFO) and Haisla Nation were notified of the event.
- LNG Canada is experiencing ongoing challenges with respect to reporting on the marine monitoring program that is underway. Although the monitoring program has been implemented, and data is being collected as required under the Marine Monitoring Plan (MMP), LNG Canada recognizes the need to improve report preparation, turnaround, quality, and subsequent reporting to external stakeholders, regulatory agencies, and Indigenous Groups. In response to ongoing delayed reporting, LNG Canada is actively working with the Contractor and has implemented corrective actions to improve report quality and to streamline the review process have been so as to minimize and avoid future reporting delays.

Corrective actions implemented to date include, but are not limited to, the development of data flow charts, reporting tracking tools, and ongoing dialogue with the Contractor related to quality expectations for marine environmental reporting.

We trust you will find the attached satisfactory. If you have any questions or concerns, please do not hesitate to contact the undersigned.

Yours sincerely,

A handwritten signature in cursive script, appearing to read "Erin Furlong".

Erin Furlong
Environmental Compliance Lead
LNG Canada Development Inc.

Cc:/ Lisa Jamieson, LNG Canada
Michael Lampp, LNG Canada
Michael Eddy, LNG Canada
Meaghan Hoyle, EAO
Mark Van Doorn, EAO

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LNG Canada
2018 EAO Self-Assessment Annual Report - Schedule B Table Of Conditions

EAC Condition Reference	EAC Condition	Activity to Fulfill Condition Requirements (2018 Annual Report)	Condition Status: Complete, Ongoing or To Be Initiated	EAC Holder Assessment of Compliance Status
1	<p>The Holder must develop, in consultation with MOE, MOH and OGC, and implement, an air quality management plan which specifies mitigation measures to reduce air emissions during Construction, and sets out the means by which the mitigation measures in the Mitigation Table under the heading "air quality" (section 5.2) related to Construction will be implemented. The Holder must demonstrate reasonable efforts to engage Aboriginal Groups in developing and sharing information regarding implementation of the plan.</p> <p>The Holder must provide the plan to EAO, MOE, MOH, OGC, and Aboriginal Groups no less than 30 days prior to the Holder's planned date to commence Construction. The Holder must implement the final plan to the satisfaction of EAO.</p> <p>Prior to commencing Operations, the Holder must develop an air quality management and monitoring plan, in consultation with MOE, MOH, and OGC, which must:</p> <ul style="list-style-type: none"> -Set out the means by which the mitigation measures in the Mitigation Table under the heading "air quality" (section 5.2) related to Operations will be implemented; -Specify the measures to monitor air emissions impacts to air, soil, water, and/or vegetation; -Include the results of sufficient baseline data to support monitoring; -Establish the approach for the regular reporting of air emissions and the effects from air emissions, including reporting to appropriate government agencies, Aboriginal Groups and the public; and -Specify an adaptive management plan to address the effects related to air quality, including the effects of air quality on soil, water and vegetation, if those effects are not mitigated to the extent identified in the Application or if unexpected effects occur. <p>The Holder must demonstrate reasonable efforts to engage Aboriginal Groups in developing and sharing information regarding implementation of the plan.</p> <p>The Holder must provide the plan to EAO, MOE, MOH, OGC, and Aboriginal Groups no less than 30 days prior to the Holder's planned date to commence Commissioning. The Holder must implement the final plan to the satisfaction of EAO.</p> <p>If the Province establishes a regional air quality and deposition monitoring program for the airshed in which the Project is located, the Holder must participate in the program to the satisfaction of MOE, OGC and EAO.</p>	<p>The EAO-approved Air Quality Management Plan was implemented for aspects of construction work that took place in the reporting year. In 2018, 62 air quality related inspections were completed by Environmental Monitors on site.</p> <p>Dust control from the various earth work scopes was the primary focus in 2018. Water trucks were used throughout the summer and into the fall to reduce dust generation.</p> <p>Although vegetation clearing occurred throughout 2018, no burning associated with this work occurred.</p> <p>LNG Canada engages in regular communication with Haisla Nation (i.e. at least weekly) regarding all LNG Canada activities at site. Through these regular engagements, issues and concerns are raised and addressed in a transparent and collaborative matter. In addition to these regular communications, LNG Canada and Haisla Nation also have a formal standing bi-weekly permitting meeting.</p>	Ongoing	In Compliance

2	<p>The Holder must develop, in consultation with OGC and the District of Kitimat, a noise management plan for construction that sets out the means by which the mitigation measures related to Construction in the Mitigation Table under the heading "acoustic environment" (section 5.4) will be implemented. The Holder must demonstrate reasonable efforts to engage with Haisla Nation in developing and sharing information regarding implementation of the plan.</p> <p>The Holder must provide the final plan to EAO, OGC, DOK and Haisla Nation no less than 30 days prior to the Holder's planned date to commence Construction. The Holder must implement the plan to the satisfaction of EAO.</p> <p>During Operations the Holder must be designed to comply with the OGC Noise Control Best Practices Guidelines (2009).</p>	<p>Construction activities at the LNG Canada project site in 2018 were minimal and no activities took place that generated significant noise. In 2018, 53 noise related inspections were completed by on site Environmental Monitors.</p> <p>No formal noise complaints were received from the public in 2018 related to the LNG Canada Project.</p> <p>LNG Canada engages in regular communication with Haisla Nation (i.e. at least weekly) regarding all LNG Canada activities at site. Through these regular engagements, issues and concerns are raised and addressed in a transparent and collaborative manner. In addition to these regular communications, LNG Canada and Haisla Nation also have a formal standing bi-weekly permitting meeting.</p>	Ongoing	In Compliance
3	<p>The Holder must develop a greenhouse gas emissions management plan in consultation with MNGD and CAS that sets out the means by which the greenhouse gas management mitigation measures related to Operations in the Application Table 20.0-1 will be implemented.</p> <p>The Holder must provide the plan to EAO no less than 60 days prior to the Holder's planned date to commence Commissioning. The Holder must provide the Plan to OGC. The Holder must implement the plan throughout Operations to the satisfaction of the EAO.</p>	<p>A greenhouse gas emissions management plan for Operations will be developed in consultation with MGND and CAS, and will provide this plan to EAO no less than 60 days prior to the planned date to commence Commissioning.</p>	Ongoing	In Compliance
4	<p>The Holder must develop, in consultation with DFO and OGC, a fish management and monitoring plan that must:</p> <ul style="list-style-type: none"> -Describe measures to avoid or mitigate impacts to fish and fish habitat; -Identify reduced risk work windows, and the work that will occur within these windows; -Identify any work that will occur outside of the reduced risk work windows, and measures to mitigate impacts to fish and fish habitat; -Specify measures to salvage and relocate fish where instream works will isolate freshwater fish habitat; and -Describe how the Kitimat River eulachon population are considered in the development of mitigation measures, including any Fish Habitat Offsetting Plan submitted to DFO; and -Specify an adaptive management plan to address the effects on fish and fish habitat, if those effects are not mitigated to the extent identified in the Application, or if unexpected effects occur. <p>The Holder must demonstrate reasonable efforts to engage with Haisla Nation in developing and sharing information regarding implementation of the plan.</p> <p>The Holder must provide the final plan to EAO, DFO, OGC and Haisla Nation no less than 30 days prior to the Holder's planned date to commence Construction. The Holder must implement the plan to the satisfaction of EAO.</p>	<p>On January 19, 2018 LNG, Canada received Fisheries Act Authorization 16-HPAC-01079, which was the final freshwater authorization required for project works.</p> <p>On February 14, 2018, LNG Canada, in consultation with DFO, committed to DFO that effectiveness monitoring requirements associated with 15-HPAC-00918 would be modified to reflect the beneficial changes associated with both authorizations 16-HPAC-00220 and 16-HPAC-01079; resulting in 2018 being classified as monitoring year 1, with report due January 2019.</p> <p>On April 3, 2018, LNG Canada provided to DFO detailed fish salvage plans associated with instream salvage works that were to occur in relation to 16-HPAC-00220.</p> <p>Utilizing the acquired fisheries authorizations, LNG Canada worked with OGC to obtain the various WSA Section 11's required for the fisheries / in-water works to occur on the project.</p> <p>LNG Canada has engaged in extensive consultation with Haisla Nation throughout 2018 to discuss FAA2-related matters, including construction updates, implementation of fish management and monitoring plans, and associated provincial permit applications. Specific topics of engagements include:</p> <ul style="list-style-type: none"> - LNG Canada's decision to separate the FAA2 related WSA Section 11 (changes in and about a stream) into 3 separate applications; Kitimat River Side Channel, Beaver Creek Phase 1 and Moore Creek Dyke Breach. - Section 11 WSA (changes in and about a stream) workplan for stockpile development. - Section 11 overview document that outlined all planned Section 11 applications, their timelines and how/where they relate to FAA2 (if applicable) 	Ongoing	In Compliance

		<ul style="list-style-type: none"> - Tripartite meeting with OGC to discuss Section 11 process and OGC Facility Amendment Permit applications. - Brush clearing at the Kitimat River Side Channel in preparation for installation of isolation berm and site prep. - Sharing of CPI activities schedule that included all fisheries-related work. <p>On December 15, 2018, LNG Canada Environmental Monitors (EM) were completing regular maintenance on the outflow fish screen at the Workforce Accommodation Centre (WAC) stormwater pond when a large number of impinged fish were discovered. The fish screen was installed in 2017 to prevent coho from entering the stormwater pond. Approximately 4900 fish, all identified as three-spine stickleback (TSB), were recovered from the fish screen. The stormwater pond is inspected regularly as part of the EM program, and impingement is estimated to have taken place over a 24-48 hr period. Low water levels and ice formation, resulting in declining oxygen levels in the storm pond, likely caused the TSB to attempt to migrate out of the pond, subsequently becoming trapped in the fish screen. LNG Canada closed the stormwater pond valve to prevent flow out of the pond and further fish mortality and is managing water levels in the stormwater pond on an ongoing basis to prevent further issues. Fisheries and Oceans Canada (DFO) was notified as required.</p> <p>Stakeholder and regulatory consultation related to freshwater fish and fish habitat in 2018 included:</p> <ul style="list-style-type: none"> - July 31, 2018 open house with the community on the FAA pertaining to construction of the Minette Bay Salt Marsh - Meetings and negotiations throughout 2018 with the District of Kitimat regarding road access agreements required for Minette Bay Salt Marsh - Two meetings were held with Kitimat Valley Naturalist to explain the FAA and fish salvage activities 		
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5	<p>The Holder must develop, in consultation with DFO and OGC, a marine mammal management and monitoring plan applicable during Construction that must:</p> <ul style="list-style-type: none"> -Identify the geographic areas where, and periods of time when, Construction could cause injury to marine mammals; -Identify the geographic areas where, and periods of time when, Construction could cause behavioural change to marine mammals; -Identify the time periods when elevated marine mammal occupancy is anticipated within the areas of potential injury to marine mammals or areas of potential behavioural change; -Specify the role of a Qualified Professional in observing and reporting marine mammals in the areas of potential injury to marine mammals during Construction; -Specify the construction activities (e.g. blasting, pile driving) which must stop or not start if a marine mammal is sighted in the areas of potential injury to marine mammals, and not re-start until the marine mammal has moved out of the relevant area; and -Specify mitigation measures for construction noise that will prevent or reduce behavioural change or injury to marine mammals. <p>The Holder must demonstrate reasonable efforts to engage Aboriginal Groups in developing and sharing information regarding implementation of the plan.</p> <p>The Holder must provide the plan to EAO no less than 60 days prior to the Holder's planned date to commence Construction in the marine environment. The Holder must not commence construction in the marine environment until the plan is approved by EAO. Once approved, the Holder must also provide the final plan to DFO, OGC, and Aboriginal Groups. The Holder must implement the plan to the satisfaction of EAO.</p> <p>The Holder must develop, in consultation with DFO, TC, and the Pacific Pilotage Authority, a marine mammal management and monitoring plan for Operations that must:</p> <ul style="list-style-type: none"> -Identify the geographic areas where, and periods of time when, Operations could cause behavioural change or injury to marine mammals; -Specify the speed profiles to prevent or reduce the risks of collisions between the Holder's LNG carriers and marine mammals and to prevent or reduce risk of marine mammal behavioural change caused by noise from the Holder's LNG carriers; -Specify the terms of a study during Operations to improve understanding of the behavioural disturbance or injury to marine mammals from shipping related to the Project; and 	<p>Throughout 2018, LNG Canada continued to develop and consult on the Marine EMPs in accordance with EAO and Canadian Environmental Assessment Agency (CEAA) requirements. LNG Canada Marine Plans consist of:</p> <ol style="list-style-type: none"> a. Marine Activities Plan (MAP) b. Marine Access Traffic Management Plan (MATMP) c. Dredge Environmental Management Plan d. Marine Monitoring Plan (MMP) <p>Following the consultation efforts and in-person engagements that took place on the draft MAP and draft MATMP through October and November 2017, LNG Canada received comments and feedback from Indigenous Groups, and incorporated this feedback into the draft plans where appropriate. The MAP and the MATMP were approved by EAO on February 8, 2018. LNG Canada shared the Final EAO Approved MAP and MATMP with all Indigenous Groups and regulatory agencies in February 2018.</p> <p>The draft DEMP and draft MMP were circulated to Indigenous Groups and regulatory agencies for consultation in February 2018. LNG Canada undertook a series of in-person workshops through February and March of 2018 and received comments and feedback from Indigenous Groups and regulatory agencies through this consultation. This feedback was considered and incorporated into the draft plans where appropriate. The DEMP and MMP were approved by EAO on June 21, 2018. In June 2018, LNG Canada shared the Final EAO Approved DEMP and MMP with Indigenous Groups and regulatory agencies.</p> <p>Construction activities related to the marine scope of the Project commenced in October of 2018 with the construction of the dredge disposal site. In water works began in November 2018, and consisted of obstacle and debris removal in the LNG Canada dredge pocket. In December of 2018, LNG Canada commenced Disposal at Sea (DAS) activities related to the LNG Canada dredge pocket.</p>	Ongoing	In Compliance
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	<p>-Specify an adaptive management plan to address the effects on marine mammals, if those effects are not mitigated to the extent identified in the Application or if unexpected effects occur.</p> <p>The Holder must demonstrate reasonable efforts to engage Aboriginal Groups in developing and sharing information regarding implementation of the plan.</p> <p>The Holder must provide the plan to EAO no less than 60 days prior to the Holder's planned date to commence Operations. The Holder must not commence Operations until the plan is approved by EAO. Once approved, the Holder must also provide the final plan to DFO, TC and Aboriginal Groups. The Holder must implement the plan to the satisfaction of EAO.</p> <p>As requested by EAO, the Holder must participate in provincial or federal government initiative(s) that seek to manage or monitor the cumulative effects of shipping on marine mammals in areas overlapping the Certified Marine Route or Certified Pilot Boarding Area, as shown on Figure 3 of the Certified Project Description. Groups. The Holder must implement the plan to the satisfaction of EAO. As requested by EAO, the Holder must participate in provincial or federal government initiative(s) that seek to manage or monitor the cumulative effects of shipping on marine mammals in areas overlapping the Certified Marine Route or Certified Pilot Boarding Area, as shown on Figure 3 of the Certified Project Description.</p>	<p>A marine mammal management and monitoring program was implemented for in-water works as per the EAO-Approved MMP. The Program includes the identification of monitoring and exclusion zones, as well as stop work criteria related to these zones. The Marine Mammal Observation (MMO) program has been active and continuous throughout the 2018/2019 dredge season for in-water works. Marine mammal observations are reported daily for both day and night shifts, which are used to develop monthly reports as required.</p> <p>Shut downs related to the marine mammal observation program that took place in the LNG Canada dredge pocket were largely due to weather conditions and poor visibility of the monitoring and/or exclusion zones. Three dates had MMO-related operation disruptions in November and December 2018.</p> <p>LNG Canada reports marine mammal observations to Haisla Nation as outlined in the MMP, and continues to consult with Indigenous Groups on implementation of the marine mammal observation program as appropriate.</p>		
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6	<p>The Holder must develop a marine water quality management and monitoring plan for Construction for the Certified Dredge Area. The plan must be developed in consultation with MOE, MOH, DFO and OGC.</p> <p>The Holder must demonstrate reasonable efforts to engage with Haisla Nation in developing and sharing information regarding the implementation of the plan.</p> <p>A Qualified Professional must develop the plan and supervise the implementation of the plan. The plan must include:</p> <ul style="list-style-type: none"> -Mitigation measures to minimize sediment dispersion, including, but not limited to, isolation methods; -Measures to monitor onsite sediment and water quality, particularly in relation to the re-suspension and bioavailability of polycyclic aromatic hydrocarbons, polychlorinated dibenzo-p-dioxins and furans; -An approach to communicate any exceedances of CCME Water Quality and Interim Sediment Quality Guidelines, and BC Water Quality Guidelines and Working Sediment Quality Guidelines to the appropriate regulatory authorities, and to remedy or reduce risks of those exceedances to human health; -An assessment of the risk for, and potential duration of, any exceedances of CCME Water Quality and Interim Sediment Quality Guidelines, and BC Water Quality Guidelines and Working Sediment Quality Guidelines for British Columbia during dredging activity and following Construction, and identification of mitigation to address such exceedances; -An adaptive management plan to address the effects on water quality predicted, if those effects are not mitigated to the extent identified in the Application, or if unexpected effects occur; -The results of shellfish and groundfish tissue sampling to form a baseline, to the satisfaction of EAO, including the completion of an associated human health risk assessment; and -A post-dredging follow-up program to confirm the human health risk assessment predictions, including potential additional tissue sampling to confirm the assessment of predictions regarding the bioavailability and bioaccumulation of toxins in marine organisms consumed by humans. <p>The Holder must provide the plan to EAO no less than 60 days prior to the Holder's planned date to commence Construction in the marine environment. The Holder must not</p>	<p>Throughout 2018, LNG Canada continued to develop and consult on the Marine EMPs in accordance with EAO and Canadian Environmental Assessment Agency (CEAA) requirements. LNG Canada Marine Plans consist of:</p> <ol style="list-style-type: none"> a. Marine Activities Plan (MAP) b. Marine Access Traffic Management Plan (MATMP) c. Dredge Environmental Management Plan d. Marine Monitoring Plan (MMP) <p>Following the consultation efforts and in-person engagements that took place on the draft MAP and draft MATMP through October and November 2017, LNG Canada received comments and feedback from Indigenous Groups, and incorporated this feedback into the draft plans where appropriate. The MAP and the MATMP were approved by EAO on February 8, 2018. LNG Canada shared the Final EAO Approved MAP and MATMP with all Indigenous Groups and regulatory agencies in February 2018. The draft DEMP and draft MMP were circulated to Indigenous Groups and regulatory agencies for consultation in February 2018. LNG Canada undertook a series of in-person workshops through February and March of 2018 and received comments and feedback from Indigenous Groups and regulatory agencies through this consultation. This feedback was considered and incorporated into the draft plans where appropriate. The DEMP and MMP were approved by EAO on June 21, 2018. In June 2018, LNG Canada shared the Final EAO Approved DEMP and MMP with Indigenous Groups and regulatory agencies.</p> <p>Construction activities related to the marine scope of the Project commenced in October of 2018 with the construction of the dredgeate disposal site. In water works began in November 2018, and consisted of obstacle and debris removal in the LNG Canada dredge pocket. In December of 2018, LNG Canada commenced Disposal at Sea (DAS) activities related to the LNG Canada dredge pocket.</p> <p>In December 2018, Indigenous Groups were notified that the IL+ dredge materials would be shipped from site by barge to an approved on-land disposal location between December 2018 and March 2019.</p>	Ongoing	In Compliance
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	<p>commence Construction in the marine environment until the plan is approved by EAO. Once approved, the Holder must also provide the final plan to MOE, MOH, DFO, OGC, and Haisla Nation. The Holder must implement the plan to the satisfaction of EAO.</p> <p>The Holder must, in consultation with MOE, DFO and OGC, develop a marine water quality monitoring plan for Operations to ensure that any effluent discharge from the facility marine outfall meets BC Water Quality Guidelines for the protection of marine life. The plan that must:</p> <ul style="list-style-type: none"> - Establish the initial dilution zone from the discharge point of the outfall pipe; and - Specify a monitoring program to confirm adherence to the BC Water Quality Guidelines for the protection of marine life. <p>The Holder must demonstrate reasonable efforts to engage Haisla Nation in developing and sharing information regarding implementation of the plan.</p> <p>The Holder must provide the plan to EAO no less than 60 days prior to the Holder's planned date to commence Operations. The Holder must not commence Operations until the plan is approved by EAO. Once approved, the Holder must also provide the final plan to MOE, DFO, OGC, and Haisla Nation. The Holder must implement the plan to the satisfaction of EAO. efforts to engage Haisla Nation in developing and sharing information regarding implementation of the plan. The Holder must provide the plan to EAO no less than 60 days prior to the Holder's planned date to commence Operations. The Holder must not commence Operations until the plan is approved by EAO. Once approved, the Holder must also provide the final plan to MOE, DFO, OGC, and Haisla Nation. The Holder must implement the plan to the satisfaction of EAO.</p>	<p>In 2018, water quality monitoring programs as outlined in the MMP were executed as required under the supervision of a QP. Monitoring streams include collection of water quality data related to obstacle removal, dredging activities, and DAS related monitoring. Some challenges were encountered during program execution, such as severe weather limitations (restricting access to remote sensing stations set in the ocean) and safety considerations, equipment malfunctions due to depth and tidal conditions (sedimeter malfunctions and damage due to floating debris), etc. LNG Canada and its Contractors continue to work through these challenges in order to continue to effectively implement the required programs.</p> <p>LNG Canada is experiencing ongoing challenges with respect to reporting on the marine monitoring program that is underway. Although the monitoring program has been implemented, and data is being collected as required under the MMP, LNG Canada recognizes the need to improve report preparation, turnaround, quality, and subsequent reporting to external stakeholders, regulatory agencies, and Indigenous Groups. In response to ongoing delayed reporting, LNG Canada is actively working with the Contractor and has implemented corrective actions to improve report quality and to streamline the review process have been so as to minimize and avoid future reporting delays. Corrective actions implemented to date include, but are not limited to, the development of data flow charts, reporting tracking tools, and ongoing dialogue with the Contractor related to quality expectations for marine environmental reporting. LNG Canada has been working to improve delays in reporting of marine monitoring programs, which are a result of a number of factors, including:</p> <ul style="list-style-type: none"> - extensive quality assurance and quality control process - application of continual improvement as it relates to monitoring templates - challenges with resourcing for data review and report preparation - inefficient data management / data control and related review processes <p>LNG Canada continues to consult with Haisla Nation on implementation of the water quality monitoring program as appropriate.</p>		
7	<p>The Holder must conduct an assessment to determine feasibility of implementing wind firming techniques prior to site clearing. The assessment must be conducted by a Qualified Professional. Should the Qualified Professional determine that wind firming techniques are feasible, they must be implemented to the satisfaction of EAO.</p> <p>The Holder must maintain a mature vegetation buffer of at least 30 metres between the Kitimat River and the Certified Project Area shown on Figure 1 of the CPD, where such a buffer currently exists, unless both of the following apply: removal or alteration of the buffer is required for safety or regulatory reasons, and the removal or alteration is authorized by OGC.</p>	<p>In 2018 isolated tree clearing occurred throughout the project site to facilitate various work scopes. None of the clearing undertaken within the reporting year required the implementation of wind firming techniques. With large scale tree clearing starting in December 2018, it is expected that wind firming will be associated with the 2019 reporting period.</p> <p>A mature vegetation buffer of at least 30 metres is maintained between the Kitimat River and the Certified Project Area, with the exception of required construction area for approved fisheries offsets under fisheries authorization 16-HPAC-00220 and WSA Section 11.</p>	Ongoing	In Compliance

8	<p>The Holder must develop, in consultation with FLNR and OGC, a vegetation management and monitoring plan for Construction. The plan must be based on the results of the habitat assessment surveys for red- and blue-listed plants and communities within the Certified Project Area and must:</p> <ul style="list-style-type: none"> -Specify the mitigation measures to avoid or minimize impacts to red- and blue-listed plants and communities; -Specify the pre-construction salvage and translocation program for red- and blue-listed plants; and -Include a contingency plan to mitigate effects to red- and blue-listed plants and communities if there are plants or communities discovered in addition to those identified in the habitat assessment surveys. <p>The Holder must demonstrate reasonable efforts to engage with Haisla Nation in developing and sharing information regarding implementation of the plan.</p> <p>The Holder must provide the plan to EAO no less than 60 days prior to the Holder's planned date to commence Construction. The Holder must not commence Construction until the plan is approved by EAO. Once approved, the Holder must also provide the final plan to FLNR, OGC, and Haisla Nation. The Holder must implement the plan to the satisfaction of EAO.</p>	<p>Construction activities that took place in 2018 at the LNG Canada project site were not in the vicinity of known red and blue listed plants or communities and no 'chance find' of additional plants / communities has occurred.</p> <p>No engagements took place with Haisla Nation in 2018 related to the vegetation management and monitoring plan. LNG Canada will engage with Haisla Nation on this plan on an ongoing basis as appropriate.</p>	Ongoing	In Compliance
9	<p>The Holder must develop, in consultation with FLNR and OGC, an invasive plant management plan that describes measures to prevent, monitor and control the establishment and spread of invasive plant species in the Certified Project Area during Construction and Operations.</p> <p>The Holder must demonstrate reasonable efforts to engage with Haisla Nation in developing and sharing information regarding the implementation of the plan.</p> <p>The Holder must provide the plan to EAO, FLNR, OGC, and Haisla Nation no less than 30 days prior to the Holder's planned date to commence Construction. The Holder must implement the plan to the satisfaction of EAO.</p>	<p>The Invasive Plant Management Plan was implemented for aspects of construction activities that took place in 2018. Equipment mobilizing and demobilizing from site were inspected to ensure spread of plant species was minimized.</p> <p>Areas previously managed for Himalayan Knotweed were not required in 2018 due to the maturing of planted and native plant species around constructed fish habitats. Through various vegetation surveys and environmental checks, some thistle has been observed in isolated occurrences, active management of this species did not occur in 2018 due to the low numbers and will be monitored in 2019.</p> <p>No engagements on the Invasive Plant Management Plan took place with Haisla Nation in 2018. LNG Canada will share information with Haisla Nation regarding implementation of the plan on an ongoing basis as appropriate.</p>	Ongoing	In Compliance

<p>10</p>	<p>The Holder must develop, in consultation with EC and FLNR, a wetland compensation plan that is consistent with the Federal Policy on Wetland Conservation and compensates any permanent loss of wetland function for red-listed or blue-listed wetlands and estuarine wetland communities.</p> <p>The Holder must demonstrate reasonable efforts to engage with Haisla Nation in developing and sharing information regarding implementation of the plan. The Holder must provide the final plan to EAO, EC, FLNR, and Haisla Nation no less than 30 days prior to the Holder's planned date to commence Construction. The Holder must implement the plan to the satisfaction of EAO.</p>	<p>In 2018, LNG Canada has completed various work scopes that caused a range of impacts on various wetlands on the project site. The impacts range from temporary to permanent alteration of wetlands within the Certified Project Boundary. With the finalizing of fisheries offset designs came the ability to better determine the amount of wetland creation obtained during offsetting. This activity has resulted in a reduction in the amount of wetland compensation required off site.</p> <p>In Q4 of 2018, LNG Canada completed an assessment of adjacent wetlands to the project to ensure wetland function and to improve baseline knowledge in relation to required annual monitoring.</p> <p>LNG Canada has routinely kept Haisla apprised of any relevant updates or information related to the Crown Land Use, which have been quite limited to date.</p> <ul style="list-style-type: none"> - Q2 2018 - LNG Canada shared a memo with Haisla Nation that explained the relationship between the Wetland Compensation Plan and the 4 WSA Section 11 Applications (Kitimat River Side Channel, Beaver Creek Phase 1, Moore Creek Dyke Breach, and Stockpile Area) that had been submitted to the regulator. - Q4 2018 - LNG Canada shared the revised draft of the Wetland Compensation Plan for Haisla Nation's review. LNG Canada and Haisla Nation were notified by EAO that the proposed candidate conservation areas identified were already protected within an approved Wildlife Habitat Area (Grizzly Bear Habitat) and therefore should no longer be considered in LNG Canada's revised Wetland Compensation Plan. LNG Canada is now determining next steps forward in consultation with Haisla Nation.. 	<p>Ongoing</p>	<p>In Compliance</p>
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<p>11</p>	<p>The Holder must develop, in consultation with FLNR, DFO and OGC, a surface water quality management plan to mitigate potential adverse effects of Project activities on water quality and aquatic habitat during Construction. The plan must:</p> <ul style="list-style-type: none"> -Describe how stormwater will be collected, treated, tested, and discharged, as well as any monitoring activities; and -Describe how surface water runoff around the facility will be managed to avoid potential contamination, as well as any monitoring activities. <p>The Holder must demonstrate reasonable efforts to engage with Haisla Nation in developing and sharing information regarding the implementing of the plan.</p> <p>The Holder must provide the plan to EAO, FLNR, DFO, OGC, and Haisla Nation no less than 30 days prior to the Holder's planned date to commence Construction. The Holder must implement the plan to the satisfaction of EAO.</p> <p>The Holder must develop, in consultation with FLNR, DFO and OGC, a surface water quality management plan to mitigate potential adverse effects of Project activities on water quality and aquatic habitat during Operations. The plan must:</p> <ul style="list-style-type: none"> -Describe how stormwater will be collected, treated, tested, and discharged, as well as any monitoring activities; and -Describe how surface water runoff around the facility will be managed to avoid potential contamination, as well as any monitoring activities. <p>The Holder must demonstrate reasonable efforts to engage with Haisla Nation in developing and sharing information regarding the implementing of the plan.</p> <p>The Holder must provide the plan to EAO, FLNR, DFO, OGC, and Haisla Nation no less than 30 days prior to the Holder's planned date to commence Operations. The Holder must implement the plan to the satisfaction of EAO.</p>	<p>Construction activities at the LNG Canada project site in 2018 consisted of various scopes associated with Fisheries Act Authorization (FAA) 16-HPAC-00220. All required monthly reporting has been provided to DFO as required. LNG Canada also provides these reports to Haisla Nation and OGC. The monthly FAA report specifically highlights surface water management, monitoring of quality and compliance associated with those works under the FAA.</p> <p>Surface water management continues to be a key component of regular EM inspections, as well as external inspections conducted by various regulatory agencies and Haisla Nation.</p> <p>LNG Canada undertook a series of engagements with Haisla Nation throughout 2018 regarding surface water quality management and monitoring. Specific engagements include:</p> <ul style="list-style-type: none"> - Sharing with Haisla Nation a copy of the Groundwater Monitoring Plan that is required under Section 4.3 of the LNG Canada OGC WDA for Haisla Nation's review and comment. 	<p>Ongoing</p>	<p>In Compliance</p>
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<p>12</p>	<p>The Holder must develop a wildlife management plan for Construction in consultation with EC, FLNR and OGC that must:</p> <ul style="list-style-type: none"> -Set out the means by which the wildlife mitigation measures related to Construction in the Mitigation Table under the heading "wildlife resources" (section 5.6) will be implemented; -Include results of completed marbled murrelet presence and habitat surveys, plans for additional presence surveys, and specify mitigation to avoid or reduce adverse effects of the Project on marbled murrelets and marbled murrelet habitat. Surveys must be completed prior to site clearing activity; -Include site assessment survey plans for bat species within the Certified Project Area and specify mitigation to avoid or reduce adverse effects of the Project on bat habitat, if the surveys indicate the presence of bat habitat. Surveys must be completed prior to site clearing activity; <p>Include a plan to manage human-wildlife conflict to avoid or reduce direct wildlife mortality;</p> <ul style="list-style-type: none"> -Specify the mitigation that will be implemented for wildlife habitat features that are encountered within the Certified Project Area; -Specify the consideration of migratory bird timing windows when scheduling planned flaring events, where feasible from a technical and safety perspective, to minimise the risk of mortality and injury to birds during Construction and Commissioning; -Set out a monitoring and follow-up program with respect to impacts to wildlife within the Certified Project Area during Construction. <p>The Holder must demonstrate reasonable efforts to engage with Haisla Nation in developing and sharing information regarding implementation of the plan.</p> <p>The Holder must provide the plan to EAO no less than 60 days prior to the Holder's planned date to commence Construction. The Holder must not commence Construction until the plan is approved by EAO. Once approved, the Holder must also provide the plan to EC, FLNR, OGC, and Haisla Nation. The Holder must implement the plan to the satisfaction of EAO. Marbled murrelet and bat survey results must be provided to EC and FLNR prior to site clearing.</p> <p>The Holder must develop a wildlife management plan for Operations in consultation with EC, FLNR and OGC that must:</p> <ul style="list-style-type: none"> -Set out the means by which the wildlife mitigation measures related to Operations in the Mitigation Table under the heading "wildlife resources" (section 5.6) will be implemented; -Identify mitigation measures, including migratory bird timing windows, to reduce the risk of mortality and injury to birds during planned flaring events during Operations, as feasible from a technical and safety perspective; -Include a plan to manage human-wildlife conflict to avoid or reduce direct wildlife mortality; -Identify mitigation measures to allow for wildlife passage through the estuary and continued tidal flows; and -Set out a monitoring and follow-up program with respect to impacts to wildlife the Certified Project Area during Operations. <p>The Holder must demonstrate reasonable efforts to engage with Haisla Nation in developing and sharing information regarding the implementation of the plan.</p> <p>The Holder must provide the plan to EAO no less than 60 days prior to the Holder's planned date to commence Operations. The Holder must not commence Operations until the plan is approved by EAO. Once approved, the Holder must also provide the plan to EC, FLNR, OGC, and Haisla Nation. The Holder must implement the plan to the satisfaction of EAO..</p>	<p>Construction activities at the LNG Canada project site in 2018 were in conformance with the Wildlife Management Plan. In 2018, 54 wildlife focused inspections were completed by on site Environmental Monitors.</p> <p>Migratory birds breeding and nesting were considered during clearing activities; pre-clearing surveys were conducted and all identified active nests were buffered. All required reporting to FLNRO on wildlife salvage programs has been completed.</p> <p>No specific engagements on the Wildlife Management Plan took place with Haisla Nation in 2018. LNG Canada will continue to share information with Haisla Nation regarding implementation of the plan on an ongoing basis..</p>	<p>Ongoing</p>	<p>In Compliance</p>
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13	<p>The Holder must design and deliver programs to support local and Aboriginal employment and contracting opportunities, skills training and education.</p> <p>At the time of submitting compliance reports required by this EAC's clause 1, the Holder must report to EAO on the implementation of these programs. The programs must be implemented during Construction and Operations.</p>	<p>LNG Canada continues to implement programs and services to support local and Indigenous employment and contracting opportunities, skills training and education. Key initiatives that took place/continued throughout 2018 include:</p> <ul style="list-style-type: none"> - As of December 2018, over \$330 million (CAD) in contracts and subcontracts had been approved with local area businesses, of which \$175 million (CAD) were approved with local Indigenous businesses. - During the month of October 2018, 250 workers from the local area (of which approximately 38% were Indigenous), were employed by LNG Canada or one of its contractors. - Driver Training for residents living in Kitimat: \$51,000 contribution towards driver training through the Kitimat Valley Institute (KVI) to enhance employability - Early Childhood Education Certification: \$54,000 contribution towards training for residents in Kitimat through the KVI - Trades Opportunity Scholarship program: awarding eight scholarships to grade 12 students in School District #82 planning to attend a post-secondary trades training program. - Local Contractor Networking Events: LNG Canada has hosted events to share relevant information with local and Indigenous businesses on the process and requirements to access opportunities on the Project. - Local Business Database: accessible to contractors with information about local and Indigenous businesses and services - Build Your Small Business Series: hosting free seminars on small business topics in partnership with Small Business BC, the Kitimat Chamber of Commerce and the Terrace and District Chamber of Commerce including a one day free workshop that assisted businesses on a variety of topics - Northwest Employment Advisory Committee: active and participating member of the committee, brings together employment support services from the Northwest to share information, identify opportunities for collaboration and support, and to help support better outcomes for programs and services. - Working Warriors Software: software platform dedicated to connecting Indigenous communities with jobs was piloted in Q4 - LNG Canada launched its Career Center Portal (a platform to post all direct-hire employment opportunities with LNG Canada and to house the LNG Canada Talent Community for interested candidates) and shared this information with our Indigenous Groups and Local Employment Agencies. 	Ongoing	In Compliance
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14	<p>The Holder must develop a plan to adaptively manage potential socio-economic effects on services and infrastructure delivered by provincial agencies and local governments. The scope of the plan is for effects that are directly attributable to the Project, and related to the temporary Construction workforce. The plan must include the mitigation measures in the Mitigation Table under the headings "infrastructure and services" (section 7.2) and "community health and wellbeing" (section 7.5).</p> <p>The Holder must develop the plan in consultation with CSCD and based on CSCD guidance materials. The Holder must demonstrate reasonable efforts to engage Aboriginal Groups, local governments, provincial government infrastructure and service providers in developing the plan.</p> <p>The plan must include specific actions to address the following:</p> <ul style="list-style-type: none"> -Communication with potentially affected Aboriginal Groups, local governments, provincial government infrastructure and service providers regarding Project activities and actions related to the implementation of mitigation measures; -An approach for monitoring and reporting on the effectiveness of the mitigation measures set out in the plan; -An adaptive management approach, which includes the development of additional and/or alternative mitigation measures to address the Project's effects on community infrastructure and services, if those effects are not mitigated to the extent identified in the Application, or if unexpected effects occur; and -Engagement with potentially affected Aboriginal Groups, local governments and provincial government infrastructure and service providers on the adaptive management activities. <p>The Holder must provide the plan to EAO and CSCD no less than 60 days prior to the Holder's planned date to commence Construction. The Holder must not commence Construction until the plan has been approved by EAO. Once approved, the Holder must also provide the final plan to CSCD, local governments, provincial government infrastructure and service providers, and Aboriginal Groups. The Holder is required to implement the plan, in consultation with CSCD, and to the satisfaction of EAO, until two years after the completion of Construction, or as otherwise directed by EAO.</p> <p>As requested by EAO, the Holder must participate in multi-stakeholder initiatives undertaken by the Province with regards to managing cumulative effects to community infrastructure and services.</p> <p>For the purposes of this condition, "Construction" does not include site clearing or preparation.</p>	<p>The CLISMP was approved by EAO on June 13, 2016.</p> <p>In 2018, LNG Canada began planning associated with the implementation of the CLISMP. As outlined in the 2017 Annual Report, the Social Management Roundtables (SMR) outlined in the CLISMP will be executed to align with major construction works. The SMR and the role of the municipalities throughout the SMR processes was shared with the District of Kitimat and the City of Terrace on several occasions in 2018. Further communications will commence in Q1-2 2019.</p> <p>Indigenous Groups, local governments, and provincial government will participate in the SMR and will be involved in finalizing the Terms of Reference for the SMR.</p> <p>The SMR will kick off in Q2 2019, supported by socio-economic monitoring commencing April 1, 2019. Data and stakeholder feedback will be used to assess mitigation effectiveness and adaptive management considerations. Quarterly reports will be shared with SMR participants. The 2018 CLISMP Annual report will be prepared for EAO in Q1 2019 covering the period April - December 2018.</p>	Ongoing	In Compliance
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15	<p>The Holder must develop a health and medical services plan, in consultation with Northern Health and in accordance with Northern Health's Health and Medical Services Plan: Best Management Guide for Industrial Camps. The Holder must demonstrate reasonable efforts to engage Aboriginal Groups in developing and sharing information regarding implementation of the plan. The health and medical services plan must:</p> <ul style="list-style-type: none"> -Describe the Project site and infrastructure that may impact health outcomes and the spread of disease; Specify the health care services that will be provided for the workforce residing in the workforce accommodation centre; -Establish disease / infection prevention and outbreak protocols, including preparation, response and management protocols; -Outline programs for health promotion, disease prevention and on-site wellness; and Establish a process for coordinating the management of urgent care and medical escalations with local service providers. <p>The Holder must provide the final plan to EAO and Northern Health no less than 30 days prior to the Holder's planned date to commence Construction. The Holder must implement the plan to the satisfaction of EAO.</p> <p>For the purposes of this condition, "Construction" does not include site clearing or preparation.</p>	<p>In 2018, engagements with Northern Health and Indigenous Groups continued on the LNG Canada Health and Medical Services Plan finalization.</p> <p>LNG Canada provided the following draft Health Management Plans to Indigenous Groups for consultation in May 2018:</p> <ul style="list-style-type: none"> - Draft Construction Project Execution Health Plan - Draft Communicable Disease Control Plan for LNGC's Worker Accommodation Village - Draft Health Services and Medical Emergency Response Strategy <p>LNG Canada undertook a series of in-person engagements in June 2018 to review and discuss the plans. LNG Canada received comments and feedback from Indigenous Groups and incorporated this feedback into the draft plans where appropriate. In July 2018, LNG Canada submitted the Health and Medical Services plans to EAO as required by the Condition, and shared the Final Health and Medical Services Management Plans with Indigenous Groups.</p> <p>LNG Canada continues to consult with Northern Health related to planning and execution of the Health and Medical Services Plans, and any updates to the plans resulting from these continued discussions will be provided to EAO as required.</p>	Ongoing	In Compliance
16	<p>The Holder must develop, in consultation with MOTI and the District of Kitimat, a traffic impact assessment and traffic management plan.</p> <p>The traffic impact assessment must be developed in accordance with MOTI's Planning and Designing Access to Developments manual (2009). The traffic impact assessment must include:</p> <ul style="list-style-type: none"> -A traffic safety analysis; and -An analysis of the Project's effects on vehicular traffic and infrastructure and proposed mitigation measures, including at Haisla Nation bridge and in relation to increased airport and rail traffic. <p>The traffic management plan must be developed in accordance with MOTI's Traffic Management Guidelines for Work on Roadways. The traffic management plan must:</p> <ul style="list-style-type: none"> -Identify measures to mitigate the impacts of Project-related transportation on the safety and efficiency of other users of the transportation network; and -Include measures for traffic control, public communications, incident management and response, and plan implementation. <p>The Holder must provide the traffic impact assessment and traffic management plan to EAO, MOTI, and DOK prior to there being 500 persons housed in the workforce accommodation centre. The Holder must implement the plan to the satisfaction of EAO.</p>	<p>The traffic impact assessment was provided to DoK and MoTI for comments on October 5, 2015.</p> <p>The Traffic Management Plan will be updated as required by the Condition and implementation will commence when occupancy reaches 500 persons in the workforce accommodation centre.</p>	Ongoing	In Compliance

17	<p>The Holder must develop, in consultation with TC and DFO, a marine activities plan for Construction with the objective of mitigating and monitoring impacts to marine users. The plan must:</p> <ul style="list-style-type: none"> -Set out the means by which the marine transportation measures related to Construction in the Mitigation Table under -the heading "marine transportation & use" (section 7.4) will be implemented; Identify Construction activities, including any fish habitat offset plans, that have the potential to interfere with marine navigation; -Identify existing and traditional navigational routes, fishing areas, habitat areas, harvesting areas, commercial shipping use, recreational and tourism use, Aboriginal Groups' use, and any associated timing windows; Specify actions to inform affected stakeholders and Aboriginal Groups of potential interference with marine navigation as a result of Construction activities; -Specify actions to coordinate activities with other marine users, particularly with other industrial activities related to dredging or disposal at sea; -Specify mitigation to reduce disruption of marine navigation as a result of Construction activities; and -Specify activities to monitor the effects of the Holder's shipping activities on marine users during Construction. <p>The Holder must demonstrate reasonable efforts to engage Aboriginal Groups in developing and sharing information regarding implementation of the plan.</p> <p>The Holder must provide the plan to EAO no less than 60 days prior to the Holder's planned date to commence Construction in the marine environment. The Holder must not commence Construction in the marine environment until the plan is approved by EAO. Once approved, the Holder must also provide the final plan to TC, DFO and Aboriginal Groups. The Holder must implement the plan to the satisfaction of EAO.</p> <p>The Holder must develop, in consultation with TC and DFO, a marine activities plan for Operations with the objective of mitigating and monitoring impacts to marine users. The plan must:</p> <ul style="list-style-type: none"> -Set out the means by which the marine transportation measures related to Operations in the Mitigation Table under the heading "marine transportation & use" (section 7.4) will be implemented; 	<p>Throughout 2018, LNG Canada continued to develop and consult on the Marine EMPs in accordance with EAO and Canadian Environmental Assessment Agency (CEAA) requirements. LNG Canada Marine Plans consist of:</p> <ol style="list-style-type: none"> a. Marine Activities Plan (MAP) b. Marine Access Traffic Management Plan (MATMP) c. Dredge Environmental Management Plan d. Marine Monitoring Plan (MMP) <p>The LNG Canada MATMP addresses mitigations related to marine navigation, transportation and use. The MATMP was approved by EAO on February 8, 2018.</p> <p>Construction activities related to the marine scope of the Project commenced in October of 2018 with the construction of the dredge disposal site. In water works began in November 2018, and consisted of obstacle and debris removal in the LNG Canada dredge pocket. In December of 2018, LNG Canada commenced Disposal at Sea (DAS) activities related to the LNG Canada dredge pocket.</p> <p>In 2018, LNG Canada has taken over the Marine Traffic Coordination (MTC) between Rio Tinto and project traffic. Weekly meetings are taking place between RT and LNGC to manage marine shipping issues and activities. Marine contractors, ship's agents and both industrial port operators (RT and LNGC) are communicating their marine traffic information on a daily and constant basis to the MTC.</p> <p>LNG Canada began planning for setting up local AIS infrastructure in 2019 within the Port of Kitimat. This will benefit project traffic, and also all port users. LNG Canada also continues to implement the Vessel Quality Assurance Program to evaluate marine vessels being proposed for use on the project. This has allowed the project to vet and approve only vessels and operators that meet regulatory requirements, industry standards and project commitments.</p>	Ongoing	In Compliance
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<p>Identify Operations activities, including any fish habitat offset plans, that have the potential to interfere with marine navigation;</p> <ul style="list-style-type: none"> -Identify existing and traditional navigational routes, fishing areas, habitat areas, harvesting areas, commercial shipping use, recreational and tourism use, Aboriginal Groups' use, and any associated timing windows; -A complaint resolution process for loss or damage to commercial traps, nets and other fishing equipment, and anchors and other vessel-related gear due to interactions with the Holder's LNG carriers; -Specify actions to inform affected stakeholders and Aboriginal Groups of potential interference with marine navigation as a result of Operations activities; -Specify activities to monitor the effects of the Holder's shipping activities to marine users during Operations; <p>Demonstrate the holder's participation in industry- or government-led efforts to monitor the cumulative effects of shipping activities during Operations;</p> <ul style="list-style-type: none"> -Specify actions to inform the public, marine user groups, and Aboriginal Groups about the results of the Technical Review Process of Marine Terminal Systems and Transshipment Sites (TERMPOL) process respecting the Project; -Specify actions to coordinate activities with other marine users, particularly with other shippers; and -Specify mitigation to reduce disruption of marine navigation as a result of Operations activities. <p>The Holder must demonstrate reasonable efforts to engage Aboriginal Groups in developing and sharing information regarding implementation of the plan.</p> <p>The Holder must provide the plan to EAO no less than 60 days prior to the Holder's planned date to commence Operations. The Holder must not commence Operations until the plan is approved by EAO. Once approved, the Holder must also provide the final plan to TC, DFO and Aboriginal Groups. The Holder must implement the plan to the satisfaction of EAO.</p>	<p>LNG Canada is communicating marine traffic information to Indigenous Groups and marine users as per the MATMP. LNG Canada will continue to engage with Indigenous Groups in sharing information regarding implementation of the plan.</p>		
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18	<p>The Holder must develop, in consultation with TC, a wake verification plan for Operations. The plan must:</p> <ul style="list-style-type: none"> -Identify focus areas, at shorelines and in the ocean, and periods for monitoring wake; -Describe the methodology for the selection of the focus areas and periods, including how marine users and Aboriginal Groups inform their identification and selection; -Specify a methodology for monitoring the wake of the Holder's LNG carriers, within the marine environment and at shorelines, to determine the accuracy of the results of the environmental assessment, particularly in relation to potential safety hazards to marine and shoreline users; -Include the results of baseline data to support monitoring; -Specify a process for reporting the results of the wake verification plan; -Include options for reporting, recording and responding to wake interactions between the Holder's LNG carriers and marine and shoreline users; and -Specify an adaptive management plan to address the effects of wake on marine and shoreline users if the results of the wake verification plan indicate greater wake effects than predicted in the environmental assessment, or if unexpected effects occur. <p>The Holder must demonstrate reasonable efforts to engage Aboriginal Groups in developing and sharing information regarding implementation of the plan. The Holder must demonstrate reasonable efforts to engage Aboriginal Groups and TC in the development of the approach to gathering baseline data, and its implementation.</p> <p>The Holder must provide the plan to EAO no less than 60 days prior to the Holder's planned date to commence Operations. The Holder must not commence Operations until the plan is approved by EAO. Once approved, the Holder must provide the plan to TC and Aboriginal Groups. The Holder must implement the plan to the satisfaction of EAO.</p>	LNG Canada will develop a wake verification plan and provide that plan to EAO no less than 60 days prior to planned date to commence Operations.	To be Initiated	Future Phase
19	<p>Prior to developing a workforce air quality health plan the Holder must, in consultation with MOH, MOE and WorkSafe BC, complete a human health risk assessment regarding the potential effects of air quality on workers residing at the workforce accommodation centre, to the satisfaction of EAO. The assessment must consider all criteria air contaminants assessed in the Holder's Application for an EAC.</p> <p>The Holder must develop, in consultation with MOE, MOH, and OGC, a workforce air quality health plan that must:</p> <ul style="list-style-type: none"> -Include the results of baseline data and the human health risk assessment to support monitoring; -Identify mitigation measures to reduce the risks posed by air emissions to the health of residents of the workforce accommodation centre to an acceptable level; -Include measures to monitor and report on the effectiveness of the mitigation set out in the plan; and -Provide an adaptive management plan, which includes the development of additional and/or alternative mitigation measures to address the effects of air quality on the health of residents of the workforce accommodation centre, as required. <p>The Holder must provide the plan to EAO no less than 60 days prior to the Holder's planned date to establish the workforce accommodation centre. The Holder must not establish the workforce accommodation centre until the plan is approved by EAO. Once approved, the Holder must provide the final plan to MOE and MOH. The Holder must implement the plan to the satisfaction of EAO.</p>	<p>Throughout 2018, the LNG Canada Condition 19 Working Group, consisting of the consultees listed under Condition 19, have been working together to define the approach to the air quality monitoring plan and human health risk assessment for Cedar Valley Lodge.</p> <p>In 2018, The Working Group finalized the Air Quality Monitoring Plan, including final location for an air quality monitoring trailer to support the HHRA and workforce air quality health plan development and implementation.</p> <p>LNG Canada will work with MOE, MOH and WorkSafeBC in 2019 to further advance the completion of the HHRA and the development of the Management Plan as per the Condition</p>	Ongoing	In Compliance

20	<p>The Holder must develop, to the satisfaction of EAO, a construction environmental management plan and an operations environmental management plan in accordance with section 12 of the Application. The Holder must demonstrate reasonable efforts to engage with Aboriginal Groups in developing and implementation of the plans.</p> <p>The Holder must provide the construction environmental management plan to EAO and Aboriginal Groups no less than 60 days prior to the Holder's planned date to commence Construction. The Holder must implement the plan to the satisfaction of EAO.</p> <p>The Holder must provide the operations environmental management plan to EAO and Aboriginal Groups no less than 60 days prior to the Holder's planned date to commence Operations. The Holder must implement the plan to the satisfaction of EAO.</p>	<p>Construction activities at the LNG Canada project site in 2018 were completed in accordance with the approved Construction Environmental Management Plan (CEMP) and supporting EMPs.</p> <p>Contractors utilized the CEMP to develop scope specific Environmental Work Plans and inform various work fronts on the mitigations / requirements of the Project.</p> <p>LNG Canada shares information on the implementation of the CEMP and related EMP's via the following annual compliance reports, which are provided to Indigenous Groups and made available publicly on an annual basis:</p> <ul style="list-style-type: none"> • 2017 B.C. EAO Annual Report (shared on January 31, 2018) • 2017-2018 CEAA Annual Report (shared on June 29, 2018) <p>LNG Canada will continue to engage on the implementation of the CEMP via the sharing of annual compliance reports and updated implementation schedules (as required), with an offer to meet and discuss implementation of the regulatory conditions, and through regular project and permitting update meetings.</p>	Ongoing	In Compliance
21	<p>Prior to commencing Construction, the Holder must retain the services of a Qualified Professional as an environmental monitor throughout the Construction phase of the Project with demonstrated experience and knowledge of environmental monitoring for construction projects in BC. The Holder must give the Environmental Monitor the authority to stop Project work that does not comply with:</p> <ol style="list-style-type: none"> a. the terms and conditions of the EAC; b. the mitigation measures described in the plans required by the EAC; or c. any approvals, authorizations, or other regulatory requirements applicable to the Project or the Holder. <p>The Environmental Monitor must be retained by the Holder throughout Construction.</p> <p>The Holder must notify EAO of any non-compliance with the EAC within 72 hours. The Holder must ensure that the Environmental Monitor prepares monthly reports on the Holder's compliance with (a), (b) and (c) above. These reports must be retained by the Holder through the Construction phase of the Project and for five years after commencing Operations. The reports must be provided to EAO and OGC upon request.</p>	<p>LNG Canada continues to retain Haisla-Triton to provide external Environmental Monitoring services and the Qualified Professional(s) for the various disciplines required for the Project.</p> <p>Monitor duties are also undertaken by LNG Canada professionals and specialized contractor professionals, where appropriate. Environmental Monitors have been given the authority to stop work that does not comply with clauses a, b and c of the condition. A total of 617 inspections were conducted by on site Environmental Monitors throughout 2018.</p>	Ongoing	In Compliance
22	<p>The Holder must continue to implement the EAO-approved LNG Canada Aboriginal Consultation Plan (dated August 2013) and the EAO-approved LNG Canada Public Consultation Plan (dated August 2013) for all phases of the Project. The implementation of these plans must include information sharing and discussion of site-specific mitigation measures, including the development and implementation of social and environmental plans (including compensation plans) developed to meet regulatory requirements of the Project. The Holder must provide an Aboriginal consultation report and a public consultation report to EAO: -Two years after the commencement of Construction; and -One year after the commencement of Operations. The Holder must share the Aboriginal consultation report with Aboriginal Groups for review and comment prior to providing it to EAO.</p>	<p>LNG Canada submitted the Final Draft of the Aboriginal Consultation Summary Report to the EAO in December 2017. The Final Report was shared with all Indigenous Groups on January 31, 2018. LNG Canada will continue to implement the EAO Approved LNG Canada Aboriginal Consultation Plan (dated August 2013) for all phases of the Project. The next Aboriginal Consultation Summary Report is due one year after the commencement of Operations. LNG Canada will continue to implement the EAO Approved LNG Canada Public Consultation Plan (dated August 2013) for all phases of the Project. The next Public Consultation Summary Report is due one year after the commencement of Operations.</p>	Ongoing	In Compliance

23	<p>The Holder must demonstrate reasonable efforts to engage with interested Aboriginal Groups to develop a cultural awareness program for employees prior to the commencement of Construction. At the time of submitting compliance reports required by the EAC's clause 1, the Holder must report to EAO on the program and its implementation. The Holder must implement the program to the satisfaction of EAO.</p>	<p>In 2018, LNG Canada continued to develop the cultural awareness program for the Project. Indigenous Groups were invited to engage on the review of the program in April 2018. Consultation meetings were held with interested Indigenous Groups from June-November 2018.</p> <p>Feedback from each Indigenous Group was considered and incorporated into the Cultural Awareness Program and delivery as appropriate. Revisions to the program began in October 2018, and will carry over in early 2019.</p>	Ongoing	In Compliance
24	<p>The Holder must, through discussion with Aboriginal Groups, seek to provide opportunities for members of Aboriginal Groups to participate in monitoring activities identified in the plans in this Table of Conditions that are occurring within their asserted traditional territory. In the Aboriginal consultation reports required by Condition #21 to EAO, the Holder must include information regarding the opportunities provided and the participation of members of Aboriginal Groups in monitoring activities.</p>	<p>The scope of the construction activities in 2018 provided no monitoring opportunities for Indigenous Groups outside of Haisla Nation territory. Throughout 2018, members of Haisla Nation participated in monitoring activities at site, including participating in fish and crab salvage crews, water quality sampling crews, and marine mammal observation.</p> <p>LNG Canada also undertook regular visits to site throughout the year with Haisla Nation. In November of 2018, 23 students from Haisla Nation and Kitselas First Nation attended a site tour of LNG Canada, to offer in-field learning related to environmental monitoring. Students participated in monitoring programs, including fish salvage and water quality.</p> <p>A member of the Haisla Nation continues to work with the B.C. Oil and Gas Commission (OGC) as a liaison between the Nation and the Commission, and has participated in numerous regulatory visits to site.</p> <p>LNG Canada will continue to identify and provide opportunities for Indigenous Group members to participate in various monitoring activities (outlined in the environmental management plans) occurring in their respective traditional territory.</p>	Ongoing	In Compliance