

Project Name	Woodfibre LNG Project	Inspection Status	Final
EA Certificate #	E15-02	Inspection No.	20240030_IR001
Project Status	Certified - construction	Inspection Start	2024-06-10
Inspection Type	Administrative	Trigger	Incident
UTM	10U 481915E 5501445N		
Project Description	The Woodfibre LNG Project (Project) is authorized under the Environmental Assessment Act (2018) (the Act) to construct and operate a liquefied natural gas export facility with storage capacity of 250,000 cubic metres and would produce up to 2.1 million tonnes per year of liquefied natural gas. The Project is currently in the construction phase.		
Location Description	The Project is located on the previous Woodfibre Pulp and Paper Mill site located approximately seven kilometres west-southwest of the urban centre of Squamish, British Columbia.		
Inspection Summary	<p>The following requirements were inspected against:</p> <ol style="list-style-type: none"> Section 6(2) of the BC Environmental Assessment Act (Act), with respect to the requirement to undertake project construction activities in accordance with Environmental Assessment Certificate (Certificate) #E15-02 (Appendix 1) issued for the Project. <p>Additional detail regarding these findings may be found in the sections below.</p> <p>The compliance findings in this report reflect analysis based on information obtained during the inspection commenced on the date noted above. These findings can change at any time based upon information gathered through future inspections or if new information is obtained by the Environmental Assessment Office (EAO) Compliance and Enforcement Branch (CEB).</p>		
In Attendance	Not applicable		
Certificate Holder	Woodfibre LNG General Partner Inc.		
Mailing Address	900-1185 West Georgia Vancouver, BC V6E 4E6		
Inspecting Officer(s)	Chris Parks Deputy Director Operations, Compliance and Enforcement Branch		
Record Prepared By:	Chris Parks Deputy Director Operations, Compliance and Enforcement Branch		
Record Approved By	Ben York Director, Compliance and Enforcement Branch		

INSPECTION DETAILS

Requirement 1:

Environmental Assessment Act section 6(2)

Despite any other enactment, if an environmental assessment certificate has been issued for a reviewable project, a person must not, except in accordance with the certificate,

- undertake or carry on any activity that is authorized by the certificate, or

(b) construct, operate, modify, dismantle or abandon all or part of the project facilities that are authorized by the certificate.

Inspection Details:

Amendment #3 (Appendix 2) to Environmental Assessment Certificate (Certificate) #E15-02 adds Project requirements specific to the housing of the construction workforce. These include:

- A floating worker accommodation facility (Floatel) added to the authorized infrastructure in the Certified Project Description (CPD)(Appendix 3) that must be located within the Certified Project Area prescribed by the CPD; and
- A requirement that any worker who did not reside in the District of Squamish prior to September 20, 2023, reside on the Floatel, unless that worker was granted an exception by the Holder because of extenuating circumstances, which may include place of residence being in the Sea-to-Sky Corridor, or Indigenous and cultural considerations.

Please see Appendix 2 for the complete wording of Amendment 3.

On June 7, 2024, the EAO CEB became aware that the Project may be housing workers contrary to the requirements of the Certificate and issued an information request to the Holder pursuant to section 49 of the Act on June 9, 2024.

The Certificate Holder provided a response to the information request on June 11, 2024 (Appendix 4), which identifies that Workers are being housed contrary to the requirements of the Certificate, including approximately 300 workers at a construction camp in Port Mellon and 30 workers in local hotel accommodations in Squamish. The response also identifies that 41 workers are housed in a leased building in Squamish and that these workers hold exemptions as per the provision in condition 29.1 of Amendment 3, and an additional 87 workers do not reside in the Port Mellon camp or Squamish.

The response notes that workers are currently housed in a manner contrary to the Certificate because a specific permit is required by the local government and that permit has not been issued. The response includes information specific to the Certificate Holder’s attempts to obtain that permit and comply with the requirements of the Certificate.

Amendment 3 to the Certificate added requirements to mitigate the potential adverse impacts of a large construction workforce residing within the local community. Those mitigations included the addition of the Floatel to the CPD and condition 29.1 of Amendment 3 requiring workers to reside on the Floatel and to not access the local community for recreation, entertainment or other non-work-related activities.

The Certificate Holder was provided an opportunity to review this record in order to identify any factual errors or omissions in the record. No factual errors or omissions were identified.

Section 6(2) of the Act requires that construction activities, including the housing of workers, be undertaken in accordance with the Certificate. The Certificate, via Amendment 3, requires that workers be housed on the Floatel (unless those workers have a specific exemption as per condition 29.1 of Amendment 3) and that the Floatel be located within the Certified Project Area. The information documented in this record confirms that workers are not housed on the Floatel or within the Certified Project Area. This confirms that the Certificate Holder is not compliant with section 6(2) of the Act.

Compliance Finding	Out
Enforcement Action	Order - Refer to Enforcement Summary

Actions Required by Certificate Holder & Additional Comments	
<i>None at this time</i>	
Enforcement Summary	
<p>WOODFIBRE LNG GENERAL PARTNER INC. IS NOT COMPLIANT SECTION 6(2) OF THE ENVIRONMENTAL ASSESSMENT ACT. SEE APPENDIX 5 FOR AN ORDER ISSUED UNDER SECTION 53 OF THE ENVIRONMENTAL ASSESSMENT ACT.</p> <p>THE EAO CEB MAY INSPECT TO DETERMINE IF THE WOODFIBRE LNG PROJECT HAS BEEN BROUGHT BACK INTO COMPLIANCE WITH THESE REQUIREMENTS. CONTINUED NON-COMPLIANCE WITH THESE REQUIREMENTS MAY RESULT IN ADDITIONAL ENFORCEMENT UNDER THE ENVIRONMENTAL ASSESSMENT ACT.</p>	
Regulatory Considerations	
The EAO CEB may conduct an inspection specific to the worker accommodation exemption provision in condition 29.1 of Amendment 3 at a later date.	
Inspection Record Version Dates	
Date Preliminary	2024-06-12
Date Finalized	2024-06-17
Appendices:	
<p>Appendix 1: Environmental Assessment Certificate # E15-02</p> <p>Appendix 2: Amendment #3 to Environmental Assessment Certificate #E15-02.</p> <p>Appendix 3: Schedule A to Environmental Assessment Certificate #E15-02 (Certified Project Description).</p> <p>Appendix 4: Certificate Holder response to information request.</p> <p>Appendix 5: Order WOOLNG_20240030_OR001.</p>	
Environmental Assessment Office - Compliance & Enforcement Branch	
<p>Mailing Address: PO Box 9426 Stn Prov Govt Victoria, BC V8W 9V1</p>	<p>Phone: 250-387-0131 Email: eao.compliance@gov.bc.ca Website: www.gov.bc.ca/eao</p>