

Dodge Cove – EAO Workshop #2 for the Aurora LNG Digby Island Project

Location: Dodge Cove

Date: February 9, 2017

Time: 6:00 to 9:00 PM

On December 7, 2015, EAO participated in a community tour and led a community workshop in Dodge Cove during the Pre-Application stage to provide information about the EA process, opportunities for public input and to better understand the community's interests, issues and concerns regarding the Aurora LNG Project.

The BC Environmental Assessment Office (EAO) visited Dodge Cove on February 9, 2017 for a second community workshop regarding the environmental assessment (EA) for the Aurora LNG Digby Island Project.

KEY WORKSHOP OBJECTIVES

- **EAO to directly engage with the community of Dodge Cove to:**
 - Describe and provide an update on the EA process for the Aurora LNG Digby Island Project
 - Describe and answer questions on how community members and the Dodge Cove Working Group representative can meaningfully participate in the Application Review stage
 - Understand community views on the key effects or conclusions in the Application in relation to their concerns and interests
 - Explore ideas on how to avoid or mitigate project effects on the community

UPDATE ON THE EA PROCESS AND OPPORTUNITIES FOR DODGE COVE INPUT

EAO provided an update on key EA timelines, highlighting details on how EAO reviews and considers the proponent's Application for an Environmental Assessment Certificate and information and input received by the EA Working Group and public; how EAO prepares its assessment report; the role of EAO in facilitating resolution of issues related to project effects through the EA process; and an overview of the package of documents that EAO prepares to support its assessment of the project to meet the requirements set out in the BC *Environmental Assessment Act*, as well as the *Canadian Environmental Assessment Act, 2012* under the Substitution MOU, to inform provincial and federal ministers in their respective EA decisions.

Opportunities for Dodge Cove Input

EAO noted that the Improvement District of Dodge Cove has a representative on the EA Working Group for the Aurora LNG project and can submit comments to EAO during Working Group review periods. EAO and participants discussed how Dodge Cove residents can provide meaningful comments to EAO during the Public Comment Period (January 16, 2017 – March 9, 2017), including opportunities to inform EAO's understanding of public views on how the Proponent has described the impacts in their Application, as well as how effective the mitigation measures, management plans and any monitoring and follow-up programs proposed by the Proponent will be in addressing the effects of the project. EAO suggested that further clarity of the community's views on the potential effects on "quality of life", "social cohesion", and "stress" (three key factors of concern noted by Dodge Cove) would help us better understand and characterize effects on these interests.

Participants asked EAO what Nexen must do for public consultation and response to public comments. EAO described the public consultation requirements outlined in its Initial Evaluation decision letter, dated December 14, 2016, which directed the Proponent to undertake reasonable efforts to work directly with potentially affected communities, and local government representatives to resolve issues, and clearly describe 1) the views of potentially affected communities on the extent to which the potential effects on their interests have been adequately characterized and addressed, 2) the views of potentially affected communities on the extent to which proposed mitigations and management plans will be effective, and 3) any additional mitigation steps the Proponent will take to address the issues and impacts identified through the public consultations and formal comment periods. EAO described how this fits into the Proponent's existing Public Consultation Plan and opportunities made available for the community of Dodge Cove to engage directly with the Proponent.

EAO noted that the Proponent offered to host a meeting with Dodge Cove to further explore ways to avoid or mitigate the potential residual adverse effects on the interests of Dodge Cove residents. EAO also pointed to the Proponent's [letter to EAO dated July 28, 2016](#) that included responses to key concerns raised by residents of Dodge Cove in EAO's December 7, 2015 workshop summary notes posted on [EAO's website](#).

SUMMARY OF WHAT WE HEARD

This section provides EAO's summary of the views shared by Dodge Cove residents who participated in the EA workshop on February 9, 2017.

To support the objectives of the workshop, EAO posed an open non-technical question, which framed much of the discussion: How do residents of Dodge Cove feel about the Aurora LNG Project based on what they have learned to date? The following key points provide a summary of the input EAO received:

- Upset, angry, frustrated, disappointed, worried, stressed about 1) the government-led processes for EA, Crown land tenure, and Investigative Use Permits which do not respect Dodge Cove's interests; 2) the Province ignoring the community's requests to meet, recognition of interests or offer any support; and 3) that this project may actually be built despite the impacts on Dodge Cove and the broader effects.
- Residents are angry at the government for suggesting the Digby Island location for an LNG facility in the first place, and for encouraging the Aurora LNG project at this location without first strongly considering the community's interests; Dodge Cove was never consulted on whether an LNG facility should be built on Digby Island.
- Dodge Cove residents expressed deep concerns that the BC government issued a Crown land tenure and approved Nexen's investigative use permits. Participants expressed that there was no consultation by FLNRO nor Nexen before their IUL was permitted. Participants indicated that letters were written to FLNRO and response letters directed residents to EAO's website without addressing concerns.
- Dodge Cove residents remain strongly opposed to an LNG facility on Digby Island; primarily due to increased health and safety risks as a result of the project, which are unacceptable to the community.
- Location of an LNG facility adjacent to the community contravenes SIGTTO and other global standards.
- Nexen's Application has a substantial information gaps on critical issues; these gaps further erode the credibility of the EA process or the studies undertaken.
- Participants expressed that the EA process favors the industry and its needs over citizen's rights and, regardless of the substantial range of impacts on the community of Dodge Cove, residents feel that the current government decision makers will approve the project.

- Project effects on Dodge Cove were not adequately assessed; most cannot be mitigated to acceptable levels of the community.
- Community concerns were identified from the beginning, however little has been done in the EA process to address concerns regarding the project's proximity and the serious effects to the community.
- Mitigation offered by Nexen has been "disingenuous"; many merely outlining how it will adhere to minimum regulatory requirements.
- Participants indicated that Nexen has not done sufficient baseline studies to address many of the community's concerns and it is up to the Province to make sure the studies are accurately addressing the social, economic and health effects on the community. The Province should be looking at other data and information available, not only what the proponent presents.
- Key concerns expressed during pre-application stage remain outstanding. Participants identified many serious issues related to the effects to air quality, noise, short- and long-term human health, water quality, effects to community drinking water supply, wildlife, freshwater and marine habitat, land and resource use, marine use and navigation; community health; concerns about on-site LNG; and accidents and malfunctions.
- The materials off-loading facility and floating temporary construction camp proposed in Casey Cove (the community's primary site of interest) would significantly affect many recreational activities, viewscape, and resource/food harvesting; Nexen has entirely mischaracterized all these effects in relation to Dodge Cove in its application.
- There are deep concerns regarding effects to salmon habitat in Delusion Bay and Casey Cove. DFO has stated this area is critical habitat within the Skeena River estuary.
- The Application does not accurately describe the history and heritage of Dodge Cove and Digby Island or their importance, and not only to the residents, but the region, province and the country.
- Participants expressed strong concern regarding Nexen's statements in the Application about the community of Dodge Cove being classified as a vulnerable and non-resilient population. Would like this statement removed, as it is offensive. The only reason the residents of Dodge Cove would be vulnerable is because Nexen and the BC government irresponsibly chose a site for an LNG facility that is too close to the community.
- Dodge Cove residents expressed that the Application's suggestion that they can "go elsewhere" to pursue their daily livelihood activities is extremely offensive. Generations of residents have worked hard to make the community of Dodge Cove a wonderful, nurturing and sustainable home. The function and health of the lands and waters of Digby Island are essential to maintaining residents' high quality of life. Participants expressed that Nexen could "go elsewhere" to build their LNG facility.
- Participants expressed concern that Nexen has not followed international safety standards for LNG projects (e.g. SIGTTO, SANDIA reports) to be located away from communities to protect public safety. According to international safety standards, Dodge Cove would be located within a hazard zone for accidents and malfunctions from an LNG facility. Residents of Dodge Cove would be the first to be affected. With no federal or provincial LNG response framework in place, residents are deeply concerned about Nexen's lack of an emergency response plan or an evacuation plan, including specific details on how residents would be notified and evacuated in the event of an emergency. Why is there no plan and why was the EA process not stopped until Nexen provided these and all the other late and missing data? Who will hold the proponent to task and review the plans and judge that these plans are sufficient to protect residents?

- Participants noted concerns that the potential effects specific to Dodge Cove are being lumped in with the effects on the general public. Dodge Cove must be specifically highlighted as it is the community that will be most greatly affected by the project.

In response to questions about how the community input matters in the EA process, EAO explained that EAO's assessment materials include consideration of public concerns and an assessment of potential effects on key values. EAO encouraged residents of Dodge Cove to engage in the EA process by submitting helpful comments during the public comment period that can inform our assessment.

In response to questions about why we are reviewing an application with information gaps and issues, EAO described how Nexen's Application was reviewed by EAO and the EA Working Group during the 30-day Screening/Initial Evaluation stage to determine if it met the Application Information Requirements (AIR). During this time, EAO considered input from the EA Working Group and determined the Application met the AIR and was sufficient to accept for detailed review. We continue to work through the complex issues and questions identified during the screening stage in the current Application Review stage. This includes review and consideration of further input from the Working Group, including Aboriginal Groups, and the public to inform EAO's analysis and conclusions in the Assessment Report that will be referred to Ministers at the end of the 180-day review period.

Participant ideas on how to avoid or mitigate project adverse effects on the community

EAO described that mitigation measures can be included in EA Certificate Conditions, which would become legally binding if an EA Certificate is issued. EAO challenged Dodge Cove to think about what mitigation measures they feel should be implemented to avoid or reduce effects if the project is referred to Ministers for decision. EAO posed the question to participants: If the project were to be built, what would Dodge Cove residents want to see in place to avoid or minimize effects to Dodge Cove? The discussion resulted in the following key points:

- Dodge Cove residents do not want the project built on Digby Island because the evidence provided in global standards and studies indicates that the increased health and safety risks, as well as numerous adverse effects outlined in the Application, as a result of the project are not acceptable to the community. As such, participants strongly expressed that the only reasonable mitigation measure is to not build the project on Digby Island adjacent to Dodge Cove.
- Participants were concerned that asking them to offer ideas on mitigation measures would be construed by decision makers or the proponent as accepting the project's impacts and the community's unresolved concerns; regardless of any moderate level of mitigations, the project would continue to have serious impacts on the community.
- It is obvious that the proposed industrial access road must be moved west, outside of the designated community drinking watershed: the increased health risks to their drinking water supply with movement of hazardous materials and risks of spills along the road is not acceptable.
- None of the facility components are appropriate near a community: Community is within a health and safety hazard zone as defined by numerous peer-reviewed studies and reports, which cannot be addressed with any technological fixes unless you move the project away from communities. Neither Nexen, nor the Province have followed international safety standards (e.g. SANDIA, SIGTTO reports) to mitigate serious risks to public safety.
- Nexen has been comparing its project to the Gladstone LNG facilities in Australia, siting those facilities as why the Aurora LNG project is suitable on Digby Island and close to Dodge Cove and Prince Rupert. Participants noted the many serious issues with the Australian LNG facilities]]]] and do not want that as the future for this region.

EAO understands Dodge Cove's continued opposition to the project and will capture those views in EAO's assessment report to Ministers. That said, EAO is trying to work with the community, Nexen and the Working Group to identify if there are any practical ways to further avoid or mitigate adverse effects of the project on Dodge Cove interests.

Overall, the community workshop re-emphasized the many specific issues and concerns expressed by the community during the pre-application stage of the EA process, and the community's opposition to an LNG facility adjacent to the community. There were few practical mitigation opportunities identified and no further clarity on how the effects of the project on Dodge Cove may be further addressed.