



**WORKER ACCOMMODATION STRATEGY
FOR THE
TRANS MOUNTAIN PIPELINE ULC
TRANS MOUNTAIN EXPANSION PROJECT
BC EAO CONDITION 23**

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Prepared for:



TRANSMOUNTAIN

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TABLE OF CONCORDANCE

The Table of Concordance describes how this worker accommodation strategy addresses the applicable British Columbia (BC) Environmental Assessment Office (EAO) Conditions.

CONCORDANCE WITH BRITISH COLUMBIA ENVIRONMENTAL ASSESSMENT OFFICE CONDITION 23 WORKER ACCOMMODATION STRATEGY

BC EAO CONDITION	LOCATION IN BC EAO STRATEGY	LOCATION IN NEB STRATEGY
BC EAO CONDITION 2: PLAN DEVELOPMENT		
Where a condition of this Certificate requires the Holder to develop a plan, program or other document, and such plan, program or other document must, at a minimum, include the following information:	Section 1.2 of this Strategy	Section 1.2 of NEB Worker Accommodation Strategy
a) Purpose and objectives of the plan, program or other document;		
b) Roles and responsibilities of the Holder, Project personnel and contractors;	Section 1.4 of this Strategy	--
c) Names and if applicable, professional certifications and professional stamps/seals, for those responsible for the preparation of the plan, program, or other document;	Section 9.0 of this Strategy	--
d) Schedule for implementing the plan, program or other document throughout the relevant Project phases;	Section 1.5 of this Strategy	--
e) Means by which the effectiveness of the mitigation measures will be evaluated, including a schedule for evaluating effectiveness;	Appendix A of this Strategy (see Section 1.3 of NEB Worker Accommodation Strategy)	Section 1.3 of NEB Worker Accommodation Strategy
f) Adaptive management plan to address effects of the Project if those effects: i) Are not mitigated to the extent contemplated in the Application; or ii) Are not predicted in the Application;	Appendix A of this Strategy (see Section 1.3 of NEB Worker Accommodation Strategy)	Section 1.3 of NEB Worker Accommodation Strategy
g) Schedules and methods for the submission of reporting to specific agencies, Aboriginal Group(s) and the public and the required form and content of these reports; and	N/A	N/A
h) Process and timing for updating and revising the plan, program or other document, including any consultation with agencies and Aboriginal Groups that would occur in connection with such updates and revisions.	Section 1.0 of this Strategy	Section 4.3, and Appendix A Section 3.4 of NEB Worker Accommodation Strategy
BC EAO CONDITION 23: WORKER ACCOMMODATION STRATEGY		
The Holder must prepare a worker accommodation strategy that must, in addition to meeting all of the requirements set out in NEB Condition 59:	Section 3.0 of this Strategy	Section 3.0 of NEB Worker Accommodation Strategy
a) Identify the construction camps the Holder plans to construct during the Construction of the Project;		
b) Identify the Aboriginal Groups – Terrestrial whose asserted or established traditional territory or treaty lands overlap with the locations of the construction camps identified in the plan;	Section 4.0 of this Strategy	--
c) Show the distance between Aboriginal communities and Indian Reserves and the construction camps;	Section 4.0 of this Strategy	--
d) Include a description of how the potential environmental and socio-economic impacts of construction camps on potentially impacted Aboriginal Groups – Terrestrial has been assessed, and a description of relevant mitigation measures; and	Section 5.0 of this Strategy	Section 4.1 of NEB Worker Accommodation Strategy
e) Include a plan for provision of medical and health services for employees and contractors using the construction camps.	Section 6.0 of this Strategy	--
The Holder must develop the plan in consultation with FLNRO, MOE, OGC, municipal governments, regional district governments, and Aboriginal Groups – Terrestrial, within whose boundary or asserted or established traditional territory or treaty lands a construction camp has been proposed, and submit it to EAO at least three months before the commencement of Construction.	Section 2.0 of this Strategy	Section 2.0 and Appendix A of NEB Worker Accommodation Strategy
The plan and any amendments thereto, must be implemented throughout Construction and to the satisfaction of EAO.	Section 1.5 of this Strategy	--

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1.0 INTRODUCTION

Trans Mountain Pipeline ULC (Trans Mountain) submitted a facilities application (the Application) to the National Energy Board (NEB) in December 2013 for the Trans Mountain Expansion Project (the Project or TMEP). On November 29, 2016, the Government of Canada concluded the Project was in the public interest of Canada. A Certificate of Public Convenience and Necessity and other authorizations allowing the Project to proceed were issued and became effective on December 1, 2016, subject to 157 conditions (the NEB Conditions). On January 11, 2017, the British Columbia (BC) Environment Minister and Natural Gas Development Minister issued an environmental assessment certificate to Trans Mountain for the BC portion of the Project, subject to another set of 37 conditions (the BC EAO Conditions).

The BC EAO worker accommodation strategy (BC EAO WAS or Strategy) addresses the requirements of BC EAO Condition 23. The BC EAO WAS builds upon the NEB Condition 59 worker accommodation strategy (NEB WAS) (which is attached as Appendix A of the BC EAO WAS) and should be read in conjunction with it. The Rev 3 NEB WAS in Appendix A was approved by the NEB on September 27, 2017.

The draft NEB WAS was posted on <https://www.transmountain.com/environmental-protection-plans> on February 8, 2017 for a 60-day review and comment period. The draft BC EAO WAS was posted on www.transmountain.com/environmental-plans on March 15, 2017 for a 45-day review and comment period. Invitations to review were sent to the appropriate government authorities and select Aboriginal groups, specifically:

- Ministry of Environment (MOE), BC Oil and Gas Commission (OGC), and Ministry of Forestry, Lands and Natural Resource Operations (FLNRO);
- municipal governments;
- regional district governments; and
- Aboriginal groups – terrestrial within whose boundary or asserted or established traditional territory or treaty lands a construction camp was proposed (Terrestrial Aboriginal Groups).

As camp locations have evolved, Trans Mountain has kept municipal and regional authorities, potentially affected Aboriginal groups, and affected landowners and tenants informed through in-person meetings, mail drop, email and phone. A revised version of the BC EAO WAS (Rev 3) was circulated for comment to pertinent Aboriginal groups and pertinent provincial agencies between the period of September 8 and October 4, 2017, to ensure information about final camp locations was shared and considered. This circulation inadvertently missed Little Shuswap Indian Band, and on January 25, 2018 Trans Mountain circulated the Strategy to Little Shuswap Indian Band for a 30 day review and feedback period.

1.1 Project Description

See NEB WAS Section 1.1 for a Project description.

1.2 Purpose and Objectives

The purpose of the BC EAO WAS is to provide additional information about Trans Mountain's worker accommodation approach that was not required by NEB Condition 59.

The BC EAO WAS identifies Aboriginal groups who have asserted or established traditional territory or treaty lands that overlap with the locations of the construction camps; the distance of Aboriginal home communities and/or Indian Reserves (IRs) to construction camps; a description of how the environmental and socio-economic impact of construction camps on potentially impacted Aboriginal groups has been assessed, including a description of relevant mitigation measures; and the plan for the provision of medical and health services for employees and workers using the construction camps.

The current version of the BC EAO WAS (Rev 5) has been updated based on November 30, 2017 feedback from the BC EAO requiring the Strategy to directly include Trans Mountain's approach to

monitoring the effectiveness of mitigations relating to the social impacts of worker camps; to describe how issues and effects related to the impacts of the worker camps on Indigenous communities including women, children and other vulnerable populations, will be identified and addressed; and identify opportunities to engage the Aboriginal engagement roundtables in the monitoring of social impacts. In response to this, Section 5.5 of the BC EAO WAS has been updated and the new Appendix E has been added to provide further details on the TMEP Socio-Economic Effects Monitoring Plan, including Project-specific indicators to be monitored, how the indicators relate to potential issues and impacts related to social impacts of worker camps (including via Aboriginal engagement roundtables), and the process of adaptive management to ensure mitigation effectiveness.

1.3 Links to other Trans Mountain Plans

See NEB WAS Section 1.3 for links to other Trans Mountain plans.

1.4 Roles and Responsibilities

The roles and responsibilities are provided in Appendix B. These are subject to change, and will be finalized with the development of NEB Condition 88 (Project Organizational Structure for Project Construction). The roles and responsibilities in Appendix B are relevant to the area of environmental compliance and reflect personnel who are responsible for compliance and environmental decisions.

With respect to camps, Trans Mountain is responsible for acquiring land and principal authorizations required for land access and the commencement of camp site development. general construction contractors (Contractors) will be responsible for other permits/authorizations related to camp structures/operations, operational details, camp construction and management of camps. Contractors will consult with local chambers of commerce, hoteliers and RV park managers with the aim of identifying interested local accommodation suppliers. The Contractors will prepare guidance and specifications for workers with respect to available accommodation venues.

1.5 Schedule for Implementing the Plan

This Strategy must be submitted to the BC EAO at least three months before the commencement of construction. Project planning and pre-construction activities (e.g., finalization of camp lease agreements and principal authorizations; further engagement with appropriate government authorities, Aboriginal groups and landowners on camps) will continue prior to the start of Project clearing and construction as per the latest Project schedule filed as NEB Condition 62 (at the time of submission, the most recent schedule is January 2, 2018, Filing ID [A88955](#)).

The accommodation plans for workers involved in clearing, construction and reclamation will be implemented during the applicable phase, beginning September 2017 and continuing into 2020 for final clean-up and reclamation. Camps will not be required at the start of Project construction activity, as the early activity manpower is relatively small in scale.

The BC EAO WAS is not pertinent to Project operations.

2.0 CONSULTATION AND ENGAGEMENT

Consultation and engagement activities related to worker accommodation completed between May 2012 and August 2017 with appropriate government authorities and other stakeholders are reflected in the NEB WAS (see Appendix A).

The draft BC EAO WAS (Rev 0) was provided to the following parties for a 45-day review and comment period starting March 15, 2017: FLNRO, MOE, OGC, appropriate municipal and regional governments, Terrestrial Aboriginal Groups.

Trans Mountain circulated a notification of the NEB WAS (Rev 1) to potentially affected Aboriginal groups in June 2017, which included an update on camp locations.

As identification of camp locations has evolved, Trans Mountain has kept municipal and regional authorities, potentially affected Aboriginal groups, and affected landowners and tenants informed through in-person meetings, mail drop, email and phone.

To bolster consultation specifically on the BC EAO WAS, Trans Mountain provided an updated copy of BC EAO Condition 23 (Rev 2) by email to potentially affected Terrestrial Aboriginal Groups on August 14, 2017. Feedback was requested, and a comment period of 30 days was provided for Aboriginal groups to respond. A further revised version of the BC EAO Condition WAS (Rev 3) was circulated for comment to potentially affected Terrestrial Aboriginal Groups and pertinent provincial agencies between the period of September 8 and October 4, 2017, to ensure information about final camp locations was shared.

Circulation of BC EAO WAS Rev 2 and Rev 3 was inadvertently missed for Little Shuswap Indian Band. Little Shuswap Indian Band did receive NEB WAS (Rev 1) showing the camp sites under consideration within their asserted traditional territory and no comment or feedback was received. On January 25, 2018, Trans Mountain circulated the Strategy to Little Shuswap Indian Band for a 30 day review and feedback period.

The BC EAO WAS considers and incorporates feedback received during the consultation periods, and provides a written explanation regarding how feedback has been addressed or why feedback has not been addressed. This is summarized in NEB WAS Appendix A (see also Appendix C and D of BC EAO WAS). The BC EAO WAS also considers feedback received during the comment period for the draft NEB WAS. Specific feedback received related to the circulation of the Rev 3 BC EAO WAS, which included the final camp locations, is summarized in Appendix D.

Trans Mountain and its Contractors will continue to work with municipal and regional governments and select BC provincial agencies (*i.e.*, MOE, FLNRO, and OGC) regarding camp site authorizations and permitting as detailed construction planning continues. Further, Trans Mountain will continue to engage with Terrestrial Aboriginal Groups within whose boundary or asserted or established traditional territory or treaty lands a construction camp is located.

3.0 CAMP LOCATIONS

Temporary full service camps will be used in Valemount, Blue River, Clearwater, Merritt and in the Fraser Valley/Cheam First Nation area west of Hope, BC.

See the NEB WAS Section 3.0 (Appendix A) for details on the five camp site locations.

4.0 ABORIGINAL GROUPS IN RELATION TO CAMP LOCATIONS

Table 1 summarizes Terrestrial Aboriginal Groups with asserted or established traditional territory or treaty lands that overlap with the locations of the final camp sites, noting the approximate distance between the community and each camp.

The Aboriginal groups listed in Table 1 are based on BC EAO's Aboriginal groups – terrestrial list and have been included in the consultation on the BC EAO WAS and camp locations. Trans Mountain also included other Aboriginal groups in consultation that were not on the BC EAO list where it was thought there could be an interest in camps and/or worker accommodation matters (see Appendix C).

Circulation of BC EAO WAS Rev 2 and Rev 3 was inadvertently missed for Little Shuswap Indian Band. On January 25, 2018, Trans Mountain circulated the Strategy to Little Shuswap Indian Band for a 30 day review and feedback period.

TABLE 1

LOCATION OF ABORIGINAL GROUPS – TERRESTRIAL IN RELATION TO CAMP SITES

Camp Name	Aboriginal Group - Terrestrial whose Asserted or Established Traditional Territory or Treaty Lands Overlap with the Camp Location ¹	Approximate Distance ² of Aboriginal Group - Terrestrial Community ³ to Camp
Valemount Camp, Office and Yard [VAL026.1]	Simpcw First Nation	175 km
	Canim Lake Indian Band ⁴	190 km
	Little Shuswap Indian Band	220 km
	Neskonlith Indian Band	230 km
	Lheidli T'enneh First Nation	260 km
	Adams Lake Indian Band	225 km
Blue River Camp [BLU007]	Simpcw First Nation	105 km
	Canim Lake Indian Band	150 km
	Little Shuswap Indian Band	140 km
	Neskonlith Indian Band	145 km
	Adams Lake Indian Band	145 km
Clearwater Camp 2 Road [CLE011]	Simpcw First Nation	40 km
	Canim Lake Indian Band	90 km
	Little Shuswap Indian Band	95 km
	Neskonlith Indian Band	95 km
	Adams Lake Indian Band	95 km
Merritt Camp and Office/Yard and Stockpile – Chutter Ranch [MER015]	Lower Nicola Indian Band	10 km
	Boothroyd Indian Band	60 km
	Oregon Jack Creek Band	80 km
	Lytton First Nation	65 km
	Skuppah Indian Band	65 km
	Spuzzum First Nation	80 km
	Boston Bar First Nation	60 km
	Upper Similkameen Indian Band	95 km
	Westbank First Nation	90 km
	Okanagan Indian Band	105 km
	Lower Similkameen Indian Band	115 km
	Penticton Indian Band	105 km
	Upper Nicola Band	30 km
	Ashcroft Indian Band	80 km
	Shackan Indian Band	5 km
	Nooaitch Indian Band	5 km
	Coldwater Indian Band	5 km
Cook's Ferry Indian Band	55 km	
Siska Indian Band	63 km	

TABLE 1 Cont'd

Camp Name	Aboriginal Group - Terrestrial whose Asserted or Established Traditional Territory or Treaty Lands Overlap with the Camp Location ¹	Approximate Distance ² of Aboriginal Group - Terrestrial Community ³ to Camp
Cheam Apple Road Camp [CHE053]	Skwah First Nation (Stó:lō)	15 km
	Union Bar First Nations (Stó:lō)	30 km ⁵
	Shxw'ow'hamel First Nation (Stó:lō)	15 km
	Leq'á:mel First Nation (Stó:lō)	20 km
	Aitchelitz First Nation (Stó:lō)	20 km
	Chawathil First Nation (Stó:lō)	25 km
	Kwantlen First Nation (Stó:lō)	60 km
	Kwaw-kwaw-Apilt First Nation (Stó:lō)	15 km
	Matsqui First Nation (Stó:lō)	45 km
	Scowlitz First Nation (Stó:lō)	20 km
	Skawahlook First Nation (Stó:lō)	20 km
	Skowkale First Nation (Stó:lō)	15 km
	Soowahlie Indian Band (Stó:lō)	20 km
	Squiala First Nation (Stó:lō)	20 km
	Sumas First Nation (Stó:lō)	35 km
	Tzeachten First Nation (Stó:lō)	20 km
	Yakweakwioose First Nation (Stó:lō)	15 km
	Yale First Nation (Stó:lō)	308 km
	Popkum First Nation (Stó:lō)	3 km
	Peters Band (Stó:lō)	10 km
Cheam First Nation (Stó:lō)	4 km	
Seabird Island Band (Stó:lō)	5 km	

Notes:

1. Traditional territory boundaries are based on Kinder Morgan Canada's dataset, which has been built from Aboriginal Affairs and Northern Development Canada Statement of Intent (2013) along with digitized data from publically available sources and shapefiles provided by some Aboriginal groups.
2. Distances calculated on aerial basis using Google Earth.
3. Distances are based on location of Aboriginal group's band or community office, if known.
4. In 100 Mile House, BC; specific location unknown.
5. In Hope, BC; specific location unknown.

5.0 ENVIRONMENTAL AND SOCIO-ECONOMIC IMPACT OF CAMPS ON ABORIGINAL GROUPS

5.1 How Impacts of Camps have been Assessed

The NEB WAS (see Appendix A of the BC EAO WAS) discusses how the environmental and socio-economic impacts of camps have been assessed, and notes that Trans Mountain's response to NEB Condition 60 includes an environmental and socio-economic assessment (ESA) for all temporary construction lands and infrastructure, including camps.

The NEB Condition 60 Temporary Construction Land and Infrastructure ESA was updated with the NEB in September 2017 (Filing ID [A85798](#)), and should be read for further ESA details.

Potential environmental and socio-economic effects of temporary construction lands and infrastructure were assessed in Volumes 5A and 5B (the original ESA) of the Application (Filing ID [A56004](#)) and related filings (ESA Update [Filing ID [A4F4Z3](#)] and responses to NEB IR No. 2.041 [Filing ID [A3Z4T9](#)] and NEB IR No. 3.025 [Filing ID [A4H1V2](#)]). Temporary facilities were not yet delineated at the time the original ESA was prepared; therefore, the original ESA assumed that temporary facilities would be located in previously disturbed areas or established industrial sites within the pipeline corridor. The temporary construction land and infrastructure ESA reviews all camp locations identified by Trans Mountain; it presents the findings of a review of the biophysical and socio-economic elements and evaluation of interactions, assessment indicators, potential residual effects, and significance conclusions compared to the original ESA and related filings. The original ESA considered the presence of camps and temporary workers as a driver of socio-economic effects.

5.2 How Impacts of Camps on Terrestrial Aboriginal Groups have been Assessed

Potential environmental, social and economic impacts of construction camps and temporary workers on potentially affected Terrestrial Aboriginal Groups, including Aboriginal women and children, were assessed and addressed in an integrated way throughout the original ESA.

The ESA approach considered the particular interests of Terrestrial Aboriginal Groups (and other potentially affected Aboriginal groups), ensuring that environmental and socio-economic issues and interests were identified, included and assessed.

Opportunity to identify Aboriginal interests and issues with respect to camps and temporary worker accommodation emerged through several research/issues-scoping mechanisms during the ESA. As noted and filed during the NEB proceedings, Trans Mountain facilitated traditional land and resource use (TLRU) studies with Aboriginal groups, and Trans Mountain provided funding to assist Aboriginal groups who preferred to conduct their own community-directed TLRU and/or socio-economic/cultural studies. All community-based studies were reviewed to identify any Aboriginal environmental and socio-economic interests.

During this process, a range of socio-economic interviews were also conducted with participating Aboriginal communities to specifically explore the socio-economic setting and interests including economic interests and capabilities, traditional livelihoods and culture, services and infrastructure, community health and overall community way-of-life and concerns/interests regarding the Project. Given the interconnection between traditional land use, livelihoods and culture in the Aboriginal context, information related to socio-economic elements was often provided during meetings and discussions associated with TLRU and traditional ecological knowledge.

As Project planning has progressed, ongoing Aboriginal engagement has also created opportunity to discuss general issues or interests related to camps or accommodation of temporary workers. Potential impacts/issues that were identified by Aboriginal groups specifically related to worker accommodation and camps during early stages of engagement include:

- increased public access may lead to increased pressure on resource-rich areas and potential or existing habitation sites;
- potential issues around drugs and alcohol in camps;
- the potential for camp workers to impact the safety of the local female population; and
- economic opportunities associated with locating camps on Aboriginal lands.

The social and environmental aspects of these interests are addressed by Trans Mountain through the various approaches described below, in particular the Trans Mountain Worker Code of Conduct for project workers. The interest in the economic opportunity associated with locating camps on Aboriginal lands has been evaluated on a case by case basis with interested Aboriginal groups. Trans Mountain is actively working with Cheam First Nation regarding the camp on Tseatah 2 Indian Reserve and has a letter of intent from Cheam First Nation stating desire to provide Trans Mountain access to land for a camp.

5.3 Environmental Considerations of Camps

From an environmental perspective, each camp site has been assessed to determine if there are any new or unique effects that were not considered in the original ESA and to identify specific environmental mitigation for each camp site (see NEB Condition 60 Filing ID [A85798](#)).

The temporary construction land and infrastructure ESA pursuant to NEB Condition 60 specifically evaluates each temporary camp site to examine site-specific effects on traditional land and resource use and heritage/cultural resources, as well as site-specific effects related to natural resources that underpin Aboriginal traditional experiences and practices (e.g., wildlife, vegetation).

The site-specific effects of the five TMEP camp locations are presented in Table 4 of the temporary construction land and infrastructure ESA (NEB Filing ID [A85798](#)), and key aspects are summarized in Table 2 below.

TABLE 2

SUMMARY OF SITE-SPECIFIC ASSESSMENTS OF CAMPS (FROM NEB CONDITION 60)

TMEP Camp	Environmental and Socio-Economic Setting	Studies Required or Completed	Site-Specific Mitigation Measures	Assessment
<p>Valemount Camp, Office and Yard [VAL026.1]</p>	<ul style="list-style-type: none"> • Located on mixed abandoned/overgrown golf course and recently cleared forested lands within the Village of Valemount. Access to the site adjacent to Highway 5. No new temporary access is required. • Desktop review identified a shrubby swamp with open water component onsite, associated with abandoned/overgrown golf course. • Native vegetation present onsite. A lodgepole pine/velvet-leaved blueberry/clad lichens have been observed on the Project nearby this site. Potential for rare ecological communities and rare plants. • There is a mapped, poorly defined non fish-bearing non-classified drainage (NCD) running through the site. • Located within the Robson Grizzly Bear Population Unit. • An archaeological desktop review will be conducted. • The camp is located in Valemount, BC. 	<p>Native vegetation should be surveyed prior to construction.</p> <p>An Archaeological Overview Assessment will be completed and submitted to the BC Archaeology Branch (at time of writing, Archeology Impact Assessment [AIA] has been completed and the reporting is underway).</p> <p>Wetland field studies will be conducted as warranted to confirm wetland status and boundaries. Field studies completed in August 2017 and no change from desktop assessment.</p>	<ul style="list-style-type: none"> • Confine all clearing/mowing within the staked/flagged site boundaries. Do not clear, mow or grade beyond the stakes. Clear vegetation from only those areas essential for construction. Implement additional mitigation measures for vegetation clearing in Section 7.0 of the EPP. • Salvage all available topsoil/root zone material where construction activities will take place. Refer to mitigation measures for soils handling provided in Section 8.0 of the EPP and the Soil Handling Contingency Plan (Appendix B of the EPP). • No permanent wetland loss will be associated with the site. Provincial permitting under the BC Water Sustainability Act will be completed for temporary disturbance to sites within wetlands as warranted. Field studies will be conducted as warranted to confirm wetland status and boundaries and appropriate mitigation measures will be implemented to ensure no net loss of wetland function. • Install drainage control measures, as approved by an Environmental Inspector. Implement structures and materials (e.g., cross ditches and berms), as outlined in the Soil Erosion and Sediment Control Contingency Plan (see Appendix B of the EPP) to ensure that sediment in surface water draining from the construction site does not adversely affect the surrounding terrain or any watercourses or wetlands (see Sediment Fence Dwg. 4 provided in Appendix C of the EPP). • Ensure that a 100 m separation distance is maintained between watercourses and wetlands and fuel or hazardous material storage sites, and oil change and refuelling areas, unless otherwise approved. Implement additional mitigation measures in Sections 5.0 and 7.0 of the EPP to avoid disturbance to watercourses and wetlands from Project activities. • Ensure that equipment arrives onsite clean and free of soil or vegetative debris. Clean equipment involved in topsoil/root zone material handling at weed infested sites prior to leaving the location, unless topsoil/root zone material has been salvaged from the entire construction site. Refer to Section 7.0 of the Temporary Construction Lands and Infrastructure EPP in the event that weeds are encountered during construction. • Refer to the Grizzly Bear Mitigation and Monitoring Plan: Robson, Wells Grey and Columbia Shuswap Grizzly Bear Populations Units (prepared for BC EAO Condition 19). • Schedule clearing and construction activities outside of the migratory bird nesting period (April 14 to August 19), where feasible. In the event that an active nest is found, it will be subject to site-specific mitigation measures (e.g., a clearly marked species-specific buffer around the nest or non-intrusive monitoring). • The appropriate mitigation measures will be approved by an Environmental Inspector, in consultation with a Wildlife Resource Specialist (see also the Wildlife Species of Concern Encounter and Discovery Contingency Plan provided in Appendix B of the EPP). Implement additional mitigation measures in Section 7.0 of the EPP to reduce disturbance to wildlife, including nesting birds. 	<p>Potential environmental and socio-economic effects are similar to those which have been addressed in Section 7.2 of Volume 5A and Volume 5B [NEB Filing IDs A3S1Q9 and A3S1S7]. The assessment team reviewed the temporary construction lands and infrastructure and determined that it will not change the effects assessment criteria or significance conclusions of the original ESA. The assessment concludes there are no significant residual effects.</p>

TABLE 2 Cont'd

TMEP Camp	Environmental and Socio-Economic Setting	Studies Required or Completed	Site-Specific Mitigation Measures	Assessment
Valemount Camp, Office and Yard [VAL026.1] (cont'd)			<ul style="list-style-type: none"> Following the desktop review, mitigation measures will be determined in consultation with the BC Archaeological Branch in accordance with all permit obligations under the Heritage Conservation Act. If heritage resources are discovered during construction, the Heritage Resources Discovery Contingency Plan in Appendix B of the EPP will be followed. Additional mitigation measures are also included in the Temporary Construction Lands and Infrastructure EPP. 	
Blue River Camp [BLU007]	<ul style="list-style-type: none"> Located on level, forested land with native vegetation. Access to the site is from Murtle Lake Road to an existing approach. No new temporary access is required. This site is located in an area of native vegetation. There are no wetlands located within 30 m of the site. The west edge of the camp site is located approximately 15m from a watercourse. Located within the Wells Grey Grizzly Bear Population Unit. An archaeological desktop review will be conducted. The nearest community is Blue River, BC. 	<p>Native vegetation should be surveyed prior to construction.</p> <p>An Archaeological Overview Assessment will be completed and submitted to the BC Archaeology Branch (at time of writing, AIA has been completed and the reporting is underway).</p>	<ul style="list-style-type: none"> Confine all clearing/mowing within the staked/flagged site boundaries. Do not clear, mow or grade beyond the stakes. Clear vegetation from only those areas essential for construction. Implement additional mitigation measures for vegetation clearing in Section 7.0 of the EPP. Salvage all available topsoil/root zone material where construction activities will take place. Refer to mitigation measures for soils handling provided in Section 8.0 of the EPP and the Soil Handling Contingency Plan (Appendix B of the EPP). Install drainage control measures, as approved by an Environmental Inspector. Implement structures and materials (e.g., cross ditches and berms), as outlined in the Soil Erosion and Sediment Control Contingency Plan (see Appendix B of the EPP) to ensure that sediment in surface water draining from the construction site does not adversely affect the surrounding terrain or any watercourses (see Sediment Fence Dwg. 4 provided in Appendix C of the EPP). Ensure that a 100 m separation distance is maintained between watercourses and fuel or hazardous material storage sites, and oil change and refuelling areas, unless otherwise approved. Implement additional mitigation measures in Sections 5.0 and 7.0 of the EPP to avoid disturbance to watercourses from Project activities. Ensure that equipment arrives onsite clean and free of soil or vegetative debris. Clean equipment involved in topsoil/root zone material handling at weed infested sites prior to leaving the location, unless topsoil/root zone material has been salvaged from the entire construction site. Refer to Section 7.0 of the Temporary Construction Lands and Infrastructure EPP in the event that weeds are encountered during construction. Refer to the Grizzly Bear Mitigation and Monitoring Plan: Robson, Wells Grey and Columbia Shuswap Grizzly Bear Populations Units (prepared for BC EAO Condition 19). Schedule clearing and construction activities outside of the migratory bird nesting period (April 4 to August 18), where feasible. In the event that an active nest is found, it will be subject to site-specific mitigation measures (e.g., a clearly marked species-specific buffer around the nest or non-intrusive monitoring). The appropriate mitigation measures will be approved by an Environmental Inspector, in consultation with a Wildlife Resource Specialist (see also the Wildlife Species of Concern Encounter and Discovery Contingency Plan provided in Appendix B of the EPP). Implement additional mitigation measures in Section 7.0 of the EPP to reduce disturbance to wildlife, including nesting birds. Following the desktop review, mitigation measures will be determined in consultation with the BC Archaeological Branch in accordance with all permit obligations under the Heritage Conservation Act. If heritage resources are discovered during construction, the Heritage Resources Discovery Contingency Plan in Appendix B of the EPP will be followed. Additional mitigation measures are also included in the Temporary Construction Lands and Infrastructure EPP. 	<p>Potential environmental and socio-economic effects are similar to those which have been addressed in Section 7.2 of Volume 5A and Volume 5B [NEB Filing IDs A3S1Q9 and A3S1S7]. The assessment team reviewed the temporary construction lands and infrastructure and determined that it will not change the effects assessment criteria or significance conclusions of the original ESA. The assessment concludes there are no significant residual effects.</p>

TABLE 2 Cont'd

TMEP Camp	Environmental and Socio-Economic Setting	Studies Required or Completed	Site-Specific Mitigation Measures	Assessment
Clearwater Camp (Camp 2 Road) [CLE011]	<ul style="list-style-type: none"> • Located on level, vegetated land. A new temporary access is required through disturbed land for approximately 130 m. • The site has low potential for rare plant species. • There are no wetlands located within 30 m of the site. • No watercourses present. • Located within the Wells Grey Grizzly Bear Population Unit. • An archaeological desktop review will be conducted. • The nearest community is Clearwater, BC. 	An Archaeological Overview Assessment will be completed and submitted to the BC Archaeology Branch. Desktop work is complete, and indicated low potential so no work required.	<ul style="list-style-type: none"> • Confine all clearing/mowing within the staked/flagged site boundaries. Do not clear, mow or grade beyond the stakes. Clear vegetation from only those areas essential for construction. Implement additional mitigation measures for vegetation clearing in Section 7.0 of the EPP. • Salvage all available topsoil/root zone material where construction activities will take place. Refer to mitigation measures for soils handling provided in Section 8.0 of the EPP and the Soil Handling Contingency Plan (Appendix B of the EPP). • Ensure that equipment arrives onsite clean and free of soil or vegetative debris. Clean equipment involved in topsoil/root zone material handling at weed infested sites prior to leaving the location, unless topsoil/root zone material has been salvaged from the entire construction site. Refer to Section 7.0 of the Temporary Construction Lands and Infrastructure EPP in the event that weeds are encountered during construction. • Refer to the Grizzly Bear Mitigation and Monitoring Plan: Robson, Wells Grey and Columbia Shuswap Grizzly Bear Populations Units (prepared for BC EAO Condition 19). • Schedule clearing and construction activities outside of the migratory bird nesting period (April 4 to August 18), where feasible. In the event that an active nest is found, it will be subject to site-specific mitigation measures (e.g., a clearly marked species-specific buffer around the nest or non-intrusive monitoring). • The appropriate mitigation measures will be selected by an Environmental Inspector, in consultation with a Wildlife Resource Specialist (see also the Wildlife Species of Concern Encounter and Discovery Contingency Plan provided in Appendix B of the EPP). Implement additional mitigation measures in Section 7.0 of the EPP to reduce disturbance to wildlife, including nesting birds. • Following the desktop review, mitigation measures will be determined in consultation with the BC Archaeological Branch in accordance with all permit obligations under the <i>Heritage Conservation Act</i>. If heritage resources are discovered during construction, the Heritage Resources Discovery Contingency Plan in Appendix B of the EPP will be followed. • Additional mitigation measures are also included in the Temporary Construction Lands and Infrastructure EPP. 	Potential environmental and socio-economic effects are similar to those which have been addressed in Section 7.2 of Volume 5A and Volume 5B [NEB Filing IDs A3S1Q9 and A3S1S7]. The assessment team reviewed the temporary construction lands and infrastructure and determined that it will not change the effects assessment criteria or significance conclusions of the original ESA. The assessment concludes there are no significant residual effects.
Merritt Camp, Office and Yard – Chutter Ranch [MER015]	<ul style="list-style-type: none"> • Located on pasture lands with sparse trees and existing borrow/gravel pit. Accessed via Highway 5A northeast along Berglund Road. Access upgrades may be required. • Pasture areas may include native grasses but the site does not meet the criteria of native grasslands as described in the Grassland Survey and Mitigation Plan (NEB Condition 42). • The site is within an area with a BC Conservation Data Centre (CDC) rare plant occurrence for an endangered species in an area of native vegetation. • Desktop review identified a potential shrubby swamp and wet meadow within the site. 	Native vegetation should be surveyed prior to construction. An Archaeological Overview Assessment will be completed and submitted to the BC Archaeology Branch (at time of writing, AIA has been completed and the reporting is underway).	<ul style="list-style-type: none"> • Salvage all available topsoil/root zone material where construction activities will take place. Refer to mitigation measures for soils handling provided in Section 8.0 of the EPP and the Soil Handling Contingency Plan (Appendix B of the EPP). • Assess the wind erosion hazard, competency of the sod and potential for soil pulverization due to droughty soils for the site, especially topsoil piles. Implement measures applicable to droughty, wind erodible soils to reduce the effect of soil pulverization and wind erosion (see the Soil Erosion and Sediment Control Contingency Plan and the Soil/Sod Pulverization Contingency Plan provided in Appendix B of the EPP). • Install drainage control measures, as approved by an Environmental Inspector. Implement structures and materials (e.g., cross ditches and berms), as outlined in the Soil Erosion and Sediment Control 	Potential environmental and socio-economic effects are similar to those which have been addressed in Section 7.2 of Volume 5A and Volume 5B [NEB Filing IDs A3S1Q9 and A3S1S7]. The assessment team reviewed the temporary construction lands and infrastructure and determined that it will not change the effects assessment criteria or significance conclusions of the original ESA.

TABLE 2 Cont'd

TMEP Camp	Environmental and Socio-Economic Setting	Studies Required or Completed	Site-Specific Mitigation Measures	Assessment
Merritt Camp, Office and Yard – Chutter Ranch [MER015] (cont'd)	<ul style="list-style-type: none"> • There are three mapped, non fish-bearing drainages crossing the site. One is named (Hamilton Creek), with two other unnamed features (likely NCDs) shown as tributaries to Hamilton Creek. At this location, Hamilton Creek is likely an NCD. • No specific wildlife concerns identified • An archaeological desktop review will be conducted. • The nearest community is Merritt, BC. 	Wetland field studies will be conducted as warranted to confirm wetland status and boundaries. Field studies completed in August 2017; delineation of wetland altered from desktop assessment but no change to mitigation.	Contingency Plan (see Appendix B of the EPP) to ensure that sediment in surface water draining from the construction site does not adversely affect the surrounding terrain or any watercourses or wetlands (see Sediment Fence Dwg. 4 provided in Appendix C of the EPP). <ul style="list-style-type: none"> • No permanent wetland loss will be associated with the site. Provincial permitting under the BC Water Sustainability Act will be completed for temporary disturbance to sites within wetlands as warranted. Field studies will be conducted as warranted to confirm wetland status and boundaries and appropriate mitigation measures will be implemented to ensure no net loss of wetland function. • Ensure that a 100 m separation distance is maintained between watercourses and wetlands and fuel or hazardous material storage sites, and oil change and refuelling areas, unless otherwise approved. Implement additional mitigation measures in Sections 5.0 and 7.0 of the EPP to avoid disturbance to watercourses and wetlands from Project activities. • Ensure that equipment arrives onsite clean and free of soil or vegetative debris. Clean equipment involved in topsoil/root zone material handling at weed infested sites prior to leaving the location, unless topsoil/root zone material has been salvaged from the entire construction site. Refer to Section 7.0 of the Temporary Construction Lands and Infrastructure EPP in the event that weeds are encountered during construction. • Schedule clearing and construction activities outside of the migratory bird nesting period (April 4 to August 18), where feasible. In the event that an active nest is found, it will be subject to site-specific mitigation measures (e.g., a clearly marked species-specific buffer around the nest or non-intrusive monitoring). The appropriate mitigation measures will be selected by an Environmental Inspector, in consultation with a Wildlife Resource Specialist (see also the Wildlife Species of Concern Encounter and Discovery Contingency Plan provided in Appendix B of the EPP). Implement additional mitigation measures in Section 7.0 of the EPP to reduce disturbance to wildlife, including nesting birds. • Following the desktop review, mitigation measures will be determined in consultation with the BC Archaeological Branch in accordance with all permit obligations under the Heritage Conservation Act. If heritage resources are discovered during construction, the Heritage Resources Discovery Contingency Plan in Appendix B of the EPP will be followed. • Additional mitigation measures are also included in the Temporary Construction Lands and Infrastructure EPP. 	The assessment concludes there are no significant residual effects.

TABLE 2 Cont'd

TMEP Camp	Environmental and Socio-Economic Setting	Studies Required or Completed	Site-Specific Mitigation Measures	Assessment
<p>Cheam Apple Road [CHE053]</p>	<ul style="list-style-type: none"> • Located on level agricultural land. Access to the site is along Apple Road. No new temporary access is required. • The site is located on previously disturbed lands (cultivated field). Low potential for rare plant habitat. • Desktop review identified a wet meadow located within the site boundary. • No specific wildlife concerns identified. • An archaeological desktop review will be conducted. • Located on the Tseatah 2 Indian Reserve (Cheam First Nation). 	<p>Wetland field studies will be conducted as warranted to confirm wetland status and boundaries.</p> <p>An Archaeological Overview Assessment will be completed and submitted to the BC Archaeology Branch (at time of writing, AIA has been completed and the reporting is underway)</p>	<ul style="list-style-type: none"> • No permanent wetland loss will be associated with the site. Provincial permitting under the BC <i>Water Sustainability Act</i> will be completed for temporary disturbance to sites within wetlands as warranted. Field studies will be conducted as warranted to confirm wetland status and boundaries and appropriate mitigation measures will be implemented to ensure no net loss of wetland function. • Install drainage control measures, as approved by an Environmental Inspector. Implement structures and materials (e.g., cross ditches and berms), as outlined in the Soil Erosion and Sediment Control Contingency Plan (see Appendix B of the EPP) to ensure that sediment in surface water draining from the construction site does not adversely affect the surrounding terrain or any watercourses or wetlands (see Sediment Fence Dwg. 4 provided in Appendix C of the EPP). • Ensure that a 100 m separation distance is maintained between watercourses and wetlands and fuel or hazardous material storage sites, and oil change and refuelling areas, unless otherwise approved. Implement additional mitigation measures in Sections 5.0 and 7.0 of the EPP to avoid disturbance to watercourses and wetlands from Project activities. • Ensure that equipment arrives onsite clean and free of soil or vegetative debris. Clean equipment involved in topsoil/root zone material handling at weed infested sites prior to leaving the location, unless topsoil/root zone material has been salvaged from the entire construction site. Refer to Section 7.0 of the Temporary Construction Lands and Infrastructure EPP in the event that weeds are encountered during construction. • Following the desktop review, mitigation measures will be determined in consultation with the BC Archaeological Branch in accordance with all permit obligations under the <i>Heritage Conservation Act</i>. If heritage resources are discovered during construction, the Heritage Resources Discovery Contingency Plan in Appendix B of the EPP will be followed. • Additional mitigation measures are also included in the Temporary Construction Lands and Infrastructure EPP. 	<p>Potential environmental and socio-economic effects are similar to those which have been addressed in Section 7.2 of Volume 5A and Volume 5B [NEB Filing IDs A3S1Q9 and A3S1S7]. The assessment team reviewed the temporary construction lands and infrastructure and determined that it will not change the effects assessment criteria or significance conclusions of the original ESA. The assessment concludes there are no significant residual effects.</p>

Section 4.1.3 of the NEB Condition 59 WAS (see Appendix of the BC EAO WAS) refers to key environmental mitigation measures that are pertinent to camps, as outlined in the temporary lands and infrastructure environmental protection plan (EPP) (filed in compliance with NEB Condition 78; Filing ID [A84142-3](#) including addendum Filing ID [A84762-5](#)). The temporary lands and infrastructure EPP presents a comprehensive list of mitigation measures for camps, including those related to general construction, site preparation and access roads.

Environmental effects of temporary workers themselves have also been included in the ESA, as noted in the original ESA, namely that there may be increased public access to traditional harvesting areas and increased pressure on environmental resources. A key mitigation, as noted and included in the NEB WAS, is the Trans Mountain Worker Code of Conduct, which contains reference to restrictions on hunting and fishing activities by non-Aboriginal workers in order to limit adverse effects on environmental resources near camps or other work locations. The Code of Conduct notes worker use and enjoyment of the environment when off-duty must be done in full compliance with all laws and regulations. It is noted that with the exception of Aboriginal workers practicing traditional use in their Aboriginal group's asserted or established traditional territory while not on shift, Project workers are prohibited from hunting, fishing and trapping and gathering plants within or along the right-of-way and at other construction sites. Fishing equipment, snowmobiles and all-terrain vehicles not used for work on the Project are prohibited at worksites and in work vehicles. The reference to restrictions to snowmobiles and all-terrain vehicles was made subsequent to the finalization of the NEB WAS, based on feedback from BC provincial agencies, and has been added to the guidance provided to workers. The most current version of the Trans Mountain Worker Code of Conduct at the time of submission has been filed with BC EAO in conjunction with the BC EAO WAS.

5.4 Social Considerations of Camps

With regard to non-land/resource-based socio-economic effects, the short-term influx of temporary workers in construction hub communities may contribute to a range of socio-economic effects, as discussed in the original ESA.

Trans Mountain understands the importance of ensuring the presence of temporary workers is managed and related social effects are minimized. Trans Mountain is aware of recent studies and public discussions about the particular vulnerabilities of Aboriginal communities and Aboriginal women and children; studies have noted that Aboriginal women and youth are at a higher risk of gender-based violence given the existing systemic challenges on IRs and few services and programs or opportunities to support them (Firelight Group 2017, Amnesty International 2016). Trans Mountain understands the possibility of issues related to temporary worker isolation, lack of support/connection and lack of cultural sensitivity, leading to adverse interactions with vulnerable community members. Trans Mountain understands the importance of ensuring mitigation is in place to limit Project-specific effects related to a temporary, largely-male workforce on vulnerable groups within construction communities.

The original ESA examined and evaluated a range of socio-economic interactions related to temporary workers, such as those related to social and cultural well-being, infrastructure and services, and community health. Aboriginal groups were considered throughout the socio-economic assessment in an integrated manner along with non-Aboriginal groups.

From a **social and cultural well-being** perspective, the ESA discusses (in Section 7.2.3, Filing ID [A3S1S7](#)) changes in population due to temporary workers, effects on community assets and values, changes in income patterns, the potential for community/worker interactions and effects on Aboriginal culture. The ESA also discusses Project effects related to **community health** (in Section 7.2.8 Filing ID [A3S1S7](#)), including the specific topic of Aboriginal health and socio-economic health effects (e.g., mental wellbeing, alcohol and drug misuse; mental health and addictions services; and sexually transmitted infection rates), many of which are related to the presence of a mobile workforce.

The ESA also discusses potential Project effects related to **access to housing, emergency, protective and social services** (Section 7.2.5 Filing ID [A3S1S7](#)), including discussion about how temporary workers can create demand and cost pressure that affect people on low-or-fixed incomes. It also discusses that temporary workers will likely not have family or regular community support in place during the period on

construction crews, and tend to be young males with higher than average disposable incomes, noting these factors can result in workers being more readily drawn into negative behaviours that lead to crime and social issues. While not specific to Aboriginal groups, it is noted that these effects are more likely to be perceptible in smaller communities. For example, the ESA discusses that in certain construction hubs some change in income patterns could emerge during the construction phase, particularly based on age, gender and cultural background. This could occur in any populated area within the socio-economic study area, though it is likely to be more perceptible in construction hubs with smaller populations. With regards to housing pressures, the ESA notes that Trans Mountain will use construction camps in certain locations to off-set pressure on housing markets. It is noted that the use of construction camps would reduce contribution to housing price inflation that could have implications for community residents with lower or fixed incomes or those not participating in the Project. As noted in the Strategy, the use of camps has been extended into more communities than originally projected, which will reduce Project-related pressure on housing and vulnerable groups.

5.5 Overview of Key Mitigation

The comprehensive siting and environmental and socio-economic assessment process associated with camp selection is a foundational underpinning that will minimize the impact of TMEP camps on neighboring Aboriginal and non-Aboriginal communities. Key mitigation that will be employed to minimize the environmental and socio-economic impacts of camps is summarized in NEB WAS Section 4.1.3, and is noted on a site-specific basis for each camp site considered in the temporary construction land and infrastructure ESA (NEB Condition 60) and summarized in Table 2 below. The temporary construction land and infrastructure EPP lists the extensive mitigation related to minimizing the environmental and socio-economic effects of camps (Filing ID [A84142-3](#), including addendum Filing ID [A84762-5](#)).

Camp locations and the ESA results related to camps have been shared with potentially affected Terrestrial Aboriginal Groups for review and feedback through the circulation and review of BC EAO WAS as well as the circulation of the Temporary Construction Lands and Infrastructure ESA (NEB Condition 60) and the draft temporary construction land and infrastructure EPP. The number of workers to be housed and Trans Mountain Worker Code of Conduct was shared with Aboriginal groups via the circulation for review and feedback regarding the NEB WAS.

Other key mitigation measures related to social effects of camps and temporary workers are found elsewhere in the Project commitments, policies and conditions, which address the important decision points for developing industrial camps and hosting a temporary workforce, as noted in recent literature (Firelight Group 2017); these key mitigations are summarized below.

Worker Conduct and Camp Culture

The Trans Mountain Worker Code of Conduct, as presented in Appendix E of the NEB WAS (and contained in Appendix A of the BC EAO WAS) and updated as filed with the BC EAO at the time of this submission, is a key mitigation resulting from the ESA that aims to reduce the potential for adverse social effects associated with the presence and behaviour of temporary workers, including effects on vulnerable groups.

The Trans Mountain Worker Code of Conduct applies to all Project workers, including camp residents and during off-duty hours. It includes requirements which are pertinent to supporting positive camp culture and reducing environmental and socio-economic effects of camps and a temporary workforce on Terrestrial Aboriginal Groups and Aboriginal women and children in particular, including the following:

- Workers must understand the nature of environmental protection plan commitments and must follow all requirements outlined in the Environmental and Compliance Education Program required prior to starting work.
- Trans Mountain has zero tolerance for use of, or being under the influence of, illicit drugs or alcohol during work hours, and workers must follow their employer's Drug and Alcohol Program which must meet or exceed Trans Mountain's Drug and Alcohol Policy.

- Workers are prohibited from harassing, discriminating against, threatening, bullying or intimidating other workers, visitors, community members, government officials, supervisors or managers in any way (and in particular from doing so on basis of race, national or ethnic origin, colour, religion, gender, age or mental or physical disability) at the workplace, in construction camps, and in local communities. This includes the utterance of threats of violence, real or implied, through any means (e.g., verbal, cyber).
- All workers must comply with the Project's Aboriginal Relations Policy, which states that Kinder Morgan Canada (KMC) is committed to working with Aboriginal communities in a spirit of cooperation and shared responsibility; and building and sustaining effective relationships based on mutual respect and trust to achieve respective business and community objectives.
- Workers are prohibited from engaging in acts of violence at any time while working on the Project (which includes both on and off work hours).
- Trans Mountain expects all Project workers to conduct themselves in an appropriate manner at all times, including during off hours. It is important that the people living in the vicinity of the Project are treated with respect and consideration.
- Worker use and enjoyment of the environment when off-duty must be done in full compliance with all laws and regulations. With the exception of Aboriginal workers practicing traditional use in their Aboriginal group's asserted or established traditional territory while not on shift, Project workers are prohibited from hunting, fishing and trapping and gathering plants within or along the right-of-way and at other construction sites.
- Violation of any of the rules and principles contained in the Trans Mountain Worker Code of Conduct, or any other Trans Mountain or KMC policies, will result in discipline which may include termination of employment or contract.

Environmental and Compliance Education Program for all Workers

All onsite workers are required to take Level 1 training within the Environmental and Compliance Education Program. This program covers a range of information important to ensuring workers are aware of the Project's environmental and social context and their responsibilities with respect to limiting environmental and social effects on communities. For example, the training covers Trans Mountain's environmental commitments; environmental responsibilities of Project workers; the local context associated with host communities and Aboriginal groups; health, safety and security matters; and the Trans Mountain Worker Code of Conduct.

The training addresses the importance of appropriate social conduct on and off duty as well as the importance of being aware of community context and how a large, mostly-male construction workforce may be experienced particularly in smaller communities, IRs and for women and children.

Cultural Awareness Training

Another key mitigation which will enhance cultural sensitivity toward Aboriginal workers and neighbouring Aboriginal communities is the requirement that all Project workers undertake the Trans Mountain Cultural Awareness Training Program. This program was developed by Trans Mountain and the Aboriginal HR Council (now Aboriginal Works) in collaboration with Aboriginal groups in proximity to the pipeline corridor. This training module will be provided during the orientation for all workers and covers content related to:

- History of Canada's Aboriginal Peoples (focus: Western Canada);
- traditional territory;
- IRs;
- Treaty and Aboriginal rights;

- the environment - shared stewardship by Aboriginal peoples and KMC, and current use by Aboriginal peoples within the Project area;
- location of the Project and proximity to Aboriginal groups;
- Aboriginal inclusion in the Project;
- partnerships; and
- shared opportunities and benefits.

Worker Health and Wellness in Camps

Other key mitigation stemming from the ESA is related to promoting worker wellness in camps, including opportunities for recreation and social connection, which is tied to reducing the potential for adverse behaviour of temporary workers. Mitigation includes:

- providing recreational amenities in camps (e.g., leisure/fitness areas);
- providing opportunities at Project camps for employees to connect electronically and/or by phone with family and friends;
- ensuring camp residents have access to information about worker assistance and social services support systems; and
- providing a community orientation to workers which includes outlining recreation guidelines and opportunities.

Worker wellness in camps is also supported by Trans Mountain's Camp Regulation and Standards Policy, which requires that camps must provide for an overall safe, quality experience for camp residents.

As noted in the Trans Mountain Worker Code of Conduct, Trans Mountain will also encourage workers to volunteer in the community, which will increase the positive interactions and sense of connection between temporary workers and host communities.

Further, as noted in Section 6.0 below, each camp will have an appropriately scaled camp-specific Health and Medical Services Plan which must promote good health protocols for camp residents and which will be developed in consultation with the local health authority.

Camp Security Plans

Camp security measures are important to ensuring camps are operated such that they are a safe and secure environment for all workers. Each Contractor is responsible for ensuring camp operators complete and implement a comprehensive Camp Security Plan which, at a minimum, is compliant with the Trans Mountain Security Plan, specific to the assets and functionality of the camp. Camp operator security plan(s) shall address topics such as security measures, fencing, gates access and control, vehicle safety, perimeter monitoring and response capacity as well as contraband detection and enforcement.

Project Complaints Process

Another key mitigation is the Project Complaints Process which has been developed to align with industry best practice, meet NEB condition requirements, and fulfill commitments made to intervenors and communities through the regulatory proceedings. The process builds on established Trans Mountain communication processes, resources and roles and will be supported by the Trans Mountain Construction Communications Plan. The goals of the process are to:

- address stakeholder questions and concerns in a timely manner;

- address questions and concerns from Aboriginal groups in a timely manner with specific sensitivity to the cultural uniqueness and cultural practices of the Aboriginal group bringing forward the complaint;
- integrate complaints from Aboriginal groups into the stakeholder complaint system where practicable but allow for the complaint received through the feedback mechanism to be brought into the existing relationships that each Aboriginal group has with the Aboriginal Engagement Team and into new relationships to be established with the Contractor; and
- meet regulatory requirements.

Traffic and Vehicle Safety

With respect to traffic and vehicle safety in relation to camps, Trans Mountain has a comprehensive Traffic Access and Control Management Plan (TACMP) designed to consider the preservation of mobility and safety to the travelling public and workers. The TACMP was prepared in respect of NEB Condition 73 (NEB Filing ID A84149). Pursuant to the TACMP, each Contractor will develop a Traffic Control Plan, which must address aspects such as (but not limited to):

- appropriately managing Project vehicle use to reduce the effects to public roadways, including the use of shuttles, buses, or carpooling in order to get staff to and from construction activity areas; and
- public protection measures.

As outlined in the Trans Mountain Health and Safety Management Plan, Contractors are also required to have a Safe Driving Program in their Project-Specific Safety Plan.

Regarding the specifics of personal vehicle use and parking at each camp, Section 4.2 of the NEB WAS (see Appendix A of the BC EAO WAS) discusses the operational requirements of camps. It notes that Contractors are developing camp specifications to ensure the appropriate level of service provision in the camp environment such that socio-economic impacts, in particularly service and infrastructure impacts, on host communities are limited. It notes that Contractors will continue to engage with the appropriate government authorities regarding camp operational details. Parking details are a required aspect of the camp specifications to be outlined in Contractors' Worker Accommodation Plans.

Socio-Economic Effects Monitoring

Another key mitigation is the establishment and implementation of the Socio-Economic Effects Monitoring Plan, or SEEMP, (as per NEB Condition 13, Filing ID A84618-3) to monitor and report on potentially adverse socio-economic effects of construction, including those associated with temporary workforce hosting and camps, including mitigation effectiveness.

While the SEEMP is distinct from the worker accommodation strategy, there are inherent links between the two plans. As noted in the NEB WAS, "worker accommodation" is a monitoring topic area within the SEEMP. Accommodation-related feedback received through socio-economic monitoring will be reviewed by Trans Mountain and may inform adaptive management with respect to worker housing and worker conduct, as appropriate, as construction progresses.

Another monitoring topic area included in the SEEMP is "Aboriginal and non-Aboriginal Community Way of Life" in specific consideration of Project-community interactions and worker behaviour non-compliance. During construction, Trans Mountain will gather information through qualitative indicators about Aboriginal social experiences during Project construction, including those related to worker accommodation and camps, worker conduct as well as Aboriginal social and cultural wellbeing. Aboriginal-specific adverse effects, including those related to camps and temporary workers, will be identified through qualitative data from Trans Mountain Aboriginal Engagement Field Advisors, Contractors' Aboriginal Relations Liaisons, the Project complaints phone line and email as well as through Aboriginal engagement roundtables.

The Aboriginal engagement roundtables will be one of the engagement mechanisms and opportunities to identify and explore qualitative feedback themes related to work camps that may specifically affect Aboriginal social and cultural well-being, including social effects of work camps related to Aboriginal women and girls, and to explore mitigation effectiveness. Through Aboriginal engagement roundtables, Trans Mountain will offer to engage with directly affected Aboriginal groups through a roundtable process to identify, listen, discuss, and respond to Project construction-related questions and issues. Aboriginal engagement roundtables may include participation by: Aboriginal group leaders, service providers (Aboriginal health and social services) and traditional knowledge holders (Aboriginal land keepers, Elders). It is proposed that such roundtables be based on a narrative inquiry approach encouraging community participants to tell stories about Project experiences. This approach will provide important information about mitigation effectiveness from an Aboriginal perspective as construction progresses and identify if adaptive management is needed to minimize effects on Aboriginal groups, including the social impacts of worker camps on Aboriginal communities and particularly Aboriginal women and children.

Appendix E provides further detail on the SEEMP monitoring process and Project-specific indicators that will be monitored during construction to identify the Project's contribution to socio-economic issues and outcomes and to review mitigation effectiveness. Discussion is included on how the indicators relate to monitoring potential social impacts of worker camps, including impacts on Aboriginal women and girls.

6.0 PLAN FOR MEDICAL AND HEALTH SERVICES IN CAMPS

Trans Mountain will ensure camp operators develop an appropriately-scaled Health and Medical Services Plan (HMSP) for construction camps. NEB Condition 64 Construction Safety Manuals requires the filing of an HSMP for the Project at least three months prior to commencing construction. Trans Mountain's HSMP will establish guidance for Contractors, including camp operators, to ensure that each adheres consistently to the standards set out by Trans Mountain.

It is expected that camp HMSPs developed by Contractors may vary to reflect the setting of each camp as appropriate, given the large geographic span of the Project.

All proposed camps are located in BC. As such, onsite health and safety programs at industrial camps will meet or exceed WorkSafeBC legislation.

Each camp HMSP will provide a summary of Project-related and camp information that is pertinent to local health providers, including:

- Contractor(s) responsible for delivering health care services and onsite initiatives;
- service providers responsible for the built camp environment components such as laundry, food, etc.;
- precise location and access routes to the camp;
- number of employees working at the site and housed at the camp (broken down over different time periods);
- information on worker turnover patterns and work shifts; and
- summary overview of key features of the camp's built environment such as; accommodation details (e.g. heating, egress, number of bedrooms, etc.); laundry services; drinking water systems; food services; liquid waste and solid waste disposal system; and recreational/leisure rooms.

Each camp HMSP will address a range of issues that include:

- requirements for medical personnel onsite;

- medical emergency response protocols (for different scenarios such as a medical emergency, automotive incident or other casualty, toxic exposure, etc.);
- communications in a medical emergency;
- communicable disease control protocols (including isolation, transport, notification, etc.);
- health promotion programming;
- incident investigation; and
- the methods by which the camp operator will work in collaboration with health authorities.

Camp HMSPs will be developed as camp operators are selected following the construction schedule, and will be developed in consultation with local health authorities pertinent to each camp location. As of early 2018, some camp HMSPs have been developed.

7.0 SUMMARY

The BC EAO WAS provides further information on Trans Mountain's worker accommodation approach, in addition to the information provided in the NEB WAS and, as such should be read together.

The BC EAO WAS provides information on potentially affected Terrestrial Aboriginal Groups and provides a description of how the environmental and socio-economic impact of construction camps on potentially impacted Aboriginal groups has been assessed, including a description of relevant mitigation measures, as well as information on the distance between each Terrestrial Aboriginal Group's understood home community and the relevant camp location.

Trans Mountain will ensure camp operators develop an appropriately-scaled HMSP for construction camps. Camp HMSPs will be developed as camp operators are selected following the construction schedule, and will be developed in consultation with local health authorities pertinent to each camp location. As of early 2018, some camp HMSPs have been developed. HMSPs for camps will include camp details pertinent to disease prevention and health promotion, as well as cover topics such as medical personnel onsite, communicable disease prevention, communications in a medical emergency, and the methods by which the camp operator will work in collaboration with health authorities.

8.0 REFERENCES

Amnesty International. 2016. Out of Sight, Out of Mind: Gender, Indigenous Rights, and Energy Development In Northeast British Columbia, Canada. 78 pp.

Firelight Group. 2017. Aboriginal Communities and Industrial Camps: Promoting Healthy Communities in Settings of Industrial Change. 77pp.

9.0 PROFESSIONAL AUTHENTICATION

This Worker Accommodation Strategy has been developed by Vista Strategy Corp., in collaboration with Trans Mountain. This individual is directly responsible for providing professional services and submitting accurate work as directed by Trans Mountain in support of the submission as required by the BC EAO.

VISTA STRATEGY CORP.

A handwritten signature in black ink that reads "Susan Dowse". The signature is written in a cursive style with a large initial 'S'.

Prepared by: Susan Dowse B.A., M.Sc.

APPENDIX A

**NEB CONDITION 59
WORKER ACCOMMODATION STRATEGY**



WORKER ACCOMMODATION STRATEGY FOR THE TRANS MOUNTAIN PIPELINE ULC TRANS MOUNTAIN EXPANSION PROJECT NEB CONDITION 59

September 2017

REV 3

01-13283-GG-0000-VST-RPT-0001

Prepared for:



TRANSMOUNTAIN

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TABLE OF CONCORDANCE

National Energy Board (NEB) Condition 59 is applicable to the following legal instruments: OC-064 (CPCN), AO-003-OC-2 (OC2), XO-T260-007-2016 (Temp), XO-T260-008-2016 (Pump 1), XO-T260-009-2016 (Pump 2) and XO-T260-010-2016 (Tanks). Table 1 describes how this Plan addresses the Condition requirements applicable to Project activities.

TABLE 1

LEGAL INSTRUMENT CONCORDANCE WITH NEB CONDITION 59: WORKER ACCOMMODATION STRATEGY

NEB Condition 59	(OC-064) CPCN	AO-003-OC-2) OC2	(XO-T260-007-2016) Temp	(XO-T260-008-2016) Pump1	(XO-T260-009-2016) Pump2	(XO-T260-010-2016) Tanks
Trans Mountain must file with the NEB for approval, at least 3 months prior to commencing construction, a worker accommodation strategy, developed in consultation with appropriate municipal or provincial authorities. The strategy must include: a) Final summary of all proposed accommodations, including location of any temporary camp(s)	Section 3.0 of this Plan	Section 3.0 of this Plan	Section 3.0 of this Plan	Section 3.0 of this Plan	Section 3.0 of this Plan	Section 3.0 of this Plan
b) Number of workers that will be housed	Section 3.0 of this Plan	Section 3.0 of this Plan	Section 3.0 of this Plan	Section 3.0 of this Plan	Section 3.30 of this Plan	Section 3.3 of this Plan
c) Description of how the strategy addresses any concerns or requests raised in consultation with municipal or provincial authorities.	Appendix A of this Plan	Appendix A of this Plan	Appendix A of this Plan	Appendix A of this Plan	Appendix A of this Plan	Appendix A of this Plan
In the event of temporary camps are to be used, the strategy must also include:	--	--	--	--	--	--
i) A description of how the potential environmental and socio-economic impacts have been assessed, and a description of all associated mitigation measures.	Section 4.1 of this Plan	Section 4.1 of this Plan	Section 4.1 of this Plan	Section 4.1 of this Plan	Section 4.1 of this Plan	Section 4.1 of this Plan
ii) Copies of, or reference to, any mitigation or operational plans that will be required or implemented for camps, including a description of how Trans Mountain has incorporated any additional mitigation measures into relevant Environmental Protection Plans	Section 4.1.3 and 4.2 of this Plan	Section 4.1.3 and 4.2 of this Plan	Section 4.1.3 and 4.2 of this Plan	Section 4.1.3 and 4.2 of this Plan	Section 4.1.3 and 4.2 of this Plan	Section 4.1.3 and 4.2 of this Plan
iii) Copies of any necessary municipal or provincial permits for any camp(s) that have been received 3 months prior to construction. If camp permits are not yet in place 3 months prior to commencing constructions, provide 1) a list of outstanding camp permits and a schedule for when these camp permits will be in place; and 2) copies of any outstanding camp permits prior to commencing construction.	Section 4.3 of this Plan	Section 4.3 of this Plan	Section 4.3 of this Plan	Section 4.3 of this Plan	Section 4.3 of this Plan	Section 4.3 of this Plan
iv) Copies or excerpts of all policies relating to rules of conduct for workers house at the camps	Section 4.4 and Appendix E of this Plan	Section 4.4 and Appendix E of this Plan	Section 4.4 and Appendix E of this Plan	Section 4.4 and Appendix E of this Plan	Section 4.4 and Appendix E of this Plan	Section 4.4 and Appendix E of this Plan
v) Confirmation that all policies relating to the camps will be provided to workers	Section 4.4 of this Plan	Section 4.4 of this Plan	Section 4.4 of this Plan	Section 4.4 of this Plan	Section 4.4 of this Plan	Section 4.4 of this Plan
vi) Confirmation that all policies relating to the camps were made available to all local communities and other relevant service providers in proximity to any camps that will be used for the Project	Section 4.4 of this Plan	Section 4.4 of this Plan	Section 4.4 of this Plan	Section 4.4 of this Plan	Section 4.4 of this Plan	Section 4.4 of this Plan
vii) A summary of its consultations with affected landowners/tenants where any camps will be located. Trans Mountain must provide: 1) a description of the information provided to local residents and landowners; 2) a summary of all issues and concerns raised and the steps Trans Mountain has taken or will take to address the issues or concerns.	Appendix A of this Plan	Appendix A of this Plan	Appendix A of this Plan	Appendix A of this Plan	Appendix A of this Plan	Appendix A of this Plan

EXECUTIVE SUMMARY

The Worker Accommodation Strategy (WAS or the Strategy) was prepared to address the requirements of National Energy Board (NEB) Condition 59 for the Trans Mountain Expansion Project (the Project or TMEP). The Strategy was released to Appropriate Government Authorities, landowners/tenants and Aboriginal groups on February 8, 2017 for a review and feedback period which concluded on April 12, 2017. As camp locations have evolved, Trans Mountain Pipelines ULC (Trans Mountain) has kept municipal and regional authorities, potentially affected Aboriginal groups and affected landowners and tenants informed through in-person meetings, by mail drop, email and phone. Trans Mountain incorporated any feedback into the final Strategy, or has provided rationale for why input has not been included, as summarized in Appendix A.

The WAS provides information regarding the accommodation strategy in construction hub communities along the Project route, based on revised construction execution schedule and workforce planning. The WAS also provides information on: the anticipated numbers of workers to be housed; the location of camps; and camp permitting and operational details.

The approach to worker accommodation employed by the Project has an important logistical purpose that enables management of socio-economic issues and opportunities associated with a temporary workforce, while at the same time ensuring the support of local communities and businesses and the ability to retain a skilled workforce. The geographic expanse of the Project and the construction schedule was also considered to ensure an adequate level of resourcing in accordance with the planned project execution.

Trans Mountain's approach to worker accommodation is multi-faceted and will vary along the Project route. Trans Mountain's approach considers:

- a) commercial accommodation capacities of local and regional communities along the Project route;
- b) the size of the anticipated non-local construction workforce in each construction hub, as estimated through detailed construction planning by Project staff with input from Engineering, Procurement, Construction Contractors and General Construction Contractors (Contractors);
- c) balancing the potential for adverse socio-economic effects associated with temporary workers, with the expressed desire to maximize economic opportunities in host communities for local commercial accommodation service providers and other businesses; and
- d) communicated preferences regarding worker accommodation from municipal and regional authorities in construction hub communities during engagement to-date.

The number of workers to be housed varies across the Project and is a factor of the size and capacity of the local and regional labour force, the estimated percentage of local workers (who will not require accommodation), and the Project components that will be undertaken in various regions. Across the Project as a whole, the total workforce is estimated to peak in October 2018 with approximately 5,500 workers engaged across all Project components. Trans Mountain's aim is to prioritize and maximize Aboriginal, local and regional hiring to the greatest extent practical, which will reduce worker accommodation needs.

The estimated number of workers to be housed, on a month-by-month basis, is provided by construction spread region in Section 3.0 of this document. The construction workforce information contained herein provides an estimate of the workers to be housed along the Project route based on current execution plans, schedules, and resource loading. All estimates are subject to further refinement as detailed construction planning continues.

The Project will have a mixed approach to worker accommodation, including the use of:

- temporary full service camps in five locations in British Columbia (BC) - Valemount, Blue River, Clearwater, Merritt and the Fraser Valley/Cheam First Nation area west of Hope, smaller communities where available accommodation would not fully meet the needs of the Project); and

- a mixture of commercial and rental accommodation options in other communities, and as needed in camp communities, including: hotels and motels; recreational vehicle (RV) parks; apartment style rental units; bed and breakfast (B&B) facilities; and lodging in private residences.

Camps will not be sized to the workforce peak, and communities will have economic opportunities related to hosting of non-local workers that exceed the designed camp capacity.

Camps will not be required at the start of Project construction activity, as the early activity manpower is relatively small in scale. For most Contractors, full camp accommodations and services will not be required until Q2-Q3 2018, the exceptions being the Valemount camp and Blue River camp which may be required in Q1 2018. The people who will be working on site during early activities (including tree clearing for approved sites under the s.58 order, XO-T260-007-2016) will be housed in locally available accommodation, such as hotels, before the camps are developed and operational.

Trans Mountain has identified final sites for the five camps. At the time of this submission, Trans Mountain confirms that lease agreements have been executed for the Valemount, Clearwater and Merritt camp sites. For the Blue River camp site (located on Crown land), an application for a Crown Licence of Occupation has been submitted and is under review by the BC Oil and Gas Commission. For the Fraser Valley/Cheam area camp, Trans Mountain is working closely with the Cheam First Nation on an identified site and leasing details, and Trans Mountain has received a Letter of Intent from Cheam First Nation stating the desire to lease land to Trans Mountain for a camp. Trans Mountain will update the Board when a lease agreement for the camp in the Fraser Valley/Cheam area is complete (anticipated by November 2017) and prior to commencing any camp site activity at this site.

Key permits pertinent to the WAS and the start of Project construction are the principal authorizations from local or provincial authorities required for land access and the commencement of camp site development. The three outstanding principal authorizations for camps and the anticipated schedule for when they will be in place are presented in Section 4.3 (Table 4) of the Strategy. This includes the Agricultural Land Commission authorization for the Clearwater camp site (anticipated end of September 2017); the Crown Licence of Occupation for the Blue River camp prior (anticipated in October 2017) and the Temporary Use Permit for the Valemount camp (anticipated in September 2017). Copies of these principal authorizations will be submitted to the NEB.

All camps will be required to have an appropriately scaled Health and Medical Services Plan, as well as plans for site-specific wastewater and sewer management; potable water; solid waste; utility or generators as the main source of power; and camp security. Trans Mountain will file the waste management plan for each camp with the NEB as they come available, which will include a description of the assessment of the potential impacts related to waste management and a description of all associated camp-specific mitigation measures.

In non-camp communities, and in camp communities where there may be non-local workers in excess of camp capacity, Contractors will conduct additional investigations with local chambers of commerce, hoteliers and RV park managers to identify interested suppliers. The Contractors will prepare guidance and specifications for workers with respect to which accommodation venues may be utilized.

Trans Mountain has developed a TMEP Worker Code of Conduct (see Appendix E of this document), which outlines expectations and requirements regarding worker conduct for all people engaged in work activity during construction of the Project. All workers are ambassadors of the Project and are expected to act accordingly. The Worker Code of Conduct outlines expectations with respect to compliance with the law; health, safety and environment; drug and alcohol use; possession of weapons; respectful behaviour; after-hours conduct, and other matters. All construction Contractors hired by Trans Mountain shall have a Worker Code of Conduct for its employees and subcontracted employees related to their work on the Project. Each Contractor's Worker Code of Conduct must include the principles, guidance and requirements in the TMEP Worker Code of Conduct. The Contractor's Worker Code of Conduct shall also apply to their subcontractors.

Trans Mountain confirms that all policies relating to camps will be provided to workers. Trans Mountain confirms the proposed TMEP Worker Code of Conduct was made available to all local communities and other relevant service providers in proximity to camp communities by way of issuance of the draft WAS for review. Trans Mountain confirms it will make the final TMEP Worker Code of Conduct similarly available to all local communities and other relevant service providers in proximity to camp communities.

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1.0 INTRODUCTION

The Worker Accommodation Strategy (WAS or the Strategy) was prepared to address the requirements of National Energy Board (NEB) Condition 59 for the Trans Mountain Expansion Project (TMEP or the Project). The Strategy was submitted to Appropriate Government Authorities, landowners/tenants and Aboriginal groups on February 8, 2017 for a review and feedback period which concluded on April 12, 2017. As camp locations have evolved, Trans Mountain Pipelines ULC (Trans Mountain) has kept municipal and regional authorities, potentially affected Aboriginal groups, and affected landowners and tenants informed through in-person meetings, by mail drop, email and phone. Trans Mountain incorporated any feedback into the final Strategy or has provided rationale for why input has not been included, as summarized in Appendix A.

The approach to worker accommodation employed by the Project has an important logistical purpose that enables management of socio-economic issues and opportunities associated with a temporary workforce, while at the same time ensuring the support of local communities and businesses and the ability to retain a skilled workforce. The geographic expanse of the Project and the construction schedule was also considered to ensure an adequate level of resourcing in accordance with the planned Project execution.

Trans Mountain's approach to worker accommodation is multi-faceted and will vary along the Project route. Trans Mountain's approach considers:

- a) commercial accommodation capacities of local and regional communities along the Project route;
- b) the size of the anticipated non-local construction workforce in each construction hub, as estimated through detailed construction planning by Project staff with input from Engineering, Procurement, Construction Contractors and General Construction Contractors (Contractors);
- c) balancing the potential for adverse socio-economic effects associated with temporary workers, with the expressed desire to maximize economic opportunities in host communities for local commercial accommodation service providers and other businesses; and
- d) communicated preferences regarding worker accommodation from host community authorities during Project-related engagement to-date.

1.1 Project Description

Trans Mountain filed its Application with the NEB in December 2013. In developing its Application, Trans Mountain commenced a program of extensive discussions with landowners, engagement with Aboriginal groups and consultation with affected stakeholders. This engagement was intended to gather input from these groups into the Application and to support the Environmental and Socio-economic Assessment (ESA), and to continue to assist Trans Mountain in the design and construction execution planning of the Project. Trans Mountain is also working with Appropriate Government Authorities to carry out the necessary reviews, studies and assessments required for the Project.

1.2 Objectives

The objective of the WAS is to:

- outline the workforce accommodation approach of the Project;
- provide information on the estimated number of workers to be housed in the various locations along the proposed Project route;
- provide information required by the NEB Condition 59 with respect to temporary construction camps; and
- demonstrate how issues raised during engagement regarding worker accommodation have been addressed and/or responded to by Trans Mountain.

1.3 Links to other Trans Mountain Plans

Information from the other plans prepared for the Project that are related to worker accommodation has been considered in this Strategy. The links between the WAS and other Trans Mountain plans is provided in Table 2.

TABLE 2

TRANS MOUNTAIN PLANS LINKED TO THE WORKER ACCOMMODATION STRATEGY

Plan	Description of the Plan	Linkage to this Plan
Socio-Economic Effects Monitoring Plan (SEEMP) (NEB Condition 13, Volume 6 of the Environmental Plans)	The SEEMP outlines Trans Mountain's plans for monitoring the adverse effects of the Project during the construction phase. The objectives of the SEEMP are to examine the effectiveness of proposed construction-phase socio-economic mitigation, identify strategies to adapt/enhance mitigation if needed, identify and respond to unanticipated socio-economic effect and issues during construction and provide information on socio-economic influences and outcomes related to construction of the Project.	The SEEMP includes indicators related to worker accommodation and temporary workforce hosting that will be tracked during the construction phase of the Project.
Environmental and Socio-economic Assessment - S.58 Temporary Construction Lands and Infrastructure (NEB Condition 60, Volume 1 of the Environmental Plans, part of Facilities Environmental Protection Plan))	NEB Condition 60 will include an environmental and socio-economic assessment for all temporary construction lands and infrastructure, including temporary camps.	The outcomes of NEB Condition 60 will inform Section 4.1.2 of the WAS and the requirement to describe how environmental and socio-economic impacts of temporary camps have been assessed and any associated mitigation measures.
List of Temporary Infrastructure Sites (NEB Condition 61)	NEB Condition 61 will include a complete list of all temporary infrastructure sites to be constructed for the Project. Updates to this list will be filed as they become available. The list must include information on each site's location, structures to be installed, the anticipated date for commencing construction, and activities involved in its construction. The initial list and any updates must also include the condition numbers (those under the "prior to commencing construction" phase heading) that are applicable to each site and an indication of whether each of those conditions has been or remains to be satisfied	The list provided for NEB Condition 61 will include temporary camp sites, which will also be referenced in the WAS.

Trans Mountain recognizes its construction activities will occur in a dynamic socio-economic environment, where other factors and activities (e.g., other projects, community activities, tourism, changing economic climate) will influence socio-economic outcomes including those related to housing capacity and utilization. As such, the implementation of Trans Mountain's WAS will be coordinated with the Socio-Economic Effects Monitoring Plan (SEEMP) as filed in accordance with NEB Condition 13 (Filing ID A84618-3). Worker accommodation is a monitoring topic area within the SEEMP (see SEEMP Table 2 in Section 1.6 Table 2, and Table 3 in Section 3.2). Accommodation-related feedback received through socio-economic monitoring will be considered by Trans Mountain and its Contractors, and may inform adaptive management with respect to worker housing, as appropriate, as the construction of the Project progresses.

1.4 Commitment Management

Trans Mountain made a number of commitments regarding the Project during the OH-001-2014 proceeding and engagement activities up to May 2016. Commitments were made to improve and optimize planning and mitigation measures. As Trans Mountain has consolidated its commitments into a Commitments Tracking Table in order to make it easier for interested parties to access and reference this information, the table of commitments in each plan has been removed.

The Commitments Tracking Table has been filed with the NEB and is available on Trans Mountain's web site at www.transmountain.com Trans Mountain continues to monitor and track compliance with its commitments and will update, post to its website and file with the NEB updated versions of the Commitments Tracking Table according to the timeframes outlined in NEB Condition 6. Commitments with specific relevance to this Plan have been considered and addressed.

2.0 CONSULTATION AND ENGAGEMENT

Consultation and engagement activities related to worker accommodation completed between May 2012 and August 2017 with Appropriate Government Authorities and other stakeholders are reflected in this document. Opportunities to discuss worker accommodation strategies and identify issues or concerns were provided to public stakeholders through the Trans Mountain website, workshops, meetings and ongoing engagement activities during the reporting period. Appendix A includes a comprehensive record of these engagement activities, stakeholder feedback and Trans Mountain responses.

The draft WAS was released on February 8, 2017 for review and feedback. Feedback was requested by April 12, 2017, although additional feedback was incorporated up until August 2017. As camp locations have evolved, Trans Mountain has kept municipal and regional authorities, potentially affected Aboriginal groups, and affected landowners and tenants informed through in-person meetings, by mail drop, email and phone. Trans Mountain incorporated feedback into the final WAS or has provided rationale for why input has not been included, as summarized in Appendix A.

3.0 SUMMARY OF PROPOSED ACCOMMODATION

This section presents information on the location of temporary camps, anticipated number of workers that will be housed and the proposed accommodation approach in each of the Project construction spreads.

The proposed accommodation approach will vary along the Project route, depending on the anticipated number of workers to be housed and the capacity of the commercial accommodation and food services markets in each construction hub. The approach also considers expressed community interests and concerns during Project engagement up to the date of this submission.

The WAS strives to achieve a balance between two opposing factors: a) the desire of communities for positive impact of economic benefits for local accommodation, retail, and service providers; and b) concerns about increasing demand on accommodation and housing that may impact non-Project users. No single solution addresses all issues. Trans Mountain has shared the proposed approach and workforce details early to allow the local communities to respond to opportunities related to hosting temporary workers, and for any shifts in approach to be explored in collaboration with appropriate municipal and provincial authorities.

The number of workers to be housed varies across the Project regions. It is a factor of the size and capacity of the local and regional labour force (who will not require accommodation), and the various Project components that will be undertaken in each region. Some Project regions will require pipeline construction alone; some require pipeline construction as well as pump station or terminal expansion. Some will not have pipeline construction but will include facilities expansion/upgrades or reactivation work.

Across the Project as a whole, construction activity will occur largely between August 2017 (initiation of work at the Westridge Marine Terminal and some early activities related to reactivation) and December 2019. Reclamation activities, with a reduced workforce, will continue through 2020, and Post Construction Monitoring for five years after in-service. The total workforce is estimated to peak in the month of October 2018 with approximately 5,500 workers/month engaged across all Project components. On average, across the full construction period, there will be approximately 2,500 workers/month engaged on the Project.

The Project is proposing a mixed approach to worker accommodation, including the use of:

- temporary full service work camps in five locations in BC - Valemount, Blue River, Clearwater, Merritt and the Fraser Valley/Cheam First Nation area west of Hope (Fraser Valley/Cheam area);
- extended stay hotels and motels;
- regional recreational vehicle (RV) parks;
- long term apartment style rental units;
- bed and breakfast (B&B) facilities; and
- private residences (e.g., lodging or renting rooms in private residences).

Camps will not be sized to the workforce peak, and communities will have economic opportunities related to hosting of non-local workers that exceed the designed camp capacity.

In non-camp communities, and in camp communities with additional non-local workers, Contractors will conduct additional investigations with local chambers of commerce, hoteliers and RV park managers to identify interested suppliers and capacity. Contractors will prepare guidance and specifications for workers with respect to which accommodation venues may be utilized. Contractors will also work with municipal authorities regarding unique accommodation arrangements during anticipated community events, and well as to understand accommodation protocols in the event of a municipal or regional (i.e., non-Project) emergency evacuation.

An overview of camp locations is provided in Section 3.1 (see Table 3). Details describing the number of anticipated workers to be housed (*i.e.*, non-local workers) and the proposed accommodation approach in each spread region are provided in Section 3.2, including detailed maps of camp site alternatives within each spread region. Figure 1 shows the Project construction spreads.

3.1 Camp Locations

The Project will have five temporary camps, located in the following areas in BC: Valemount, Blue River, Clearwater, Merritt and the Fraser Valley/Cheam area. Final camp sites have been identified in the five locations.

Trans Mountain will use full service camps in all five camp locations, to ensure appropriate services in light of community capacity.

The camp site locations for each of the five camps are summarized in Table 3, and further details are presented in the sections below. Further operational details of camps are discussed in Section 4.2, and camp authorizations pertinent to the commencement of construction are discussed in Section 4.3.

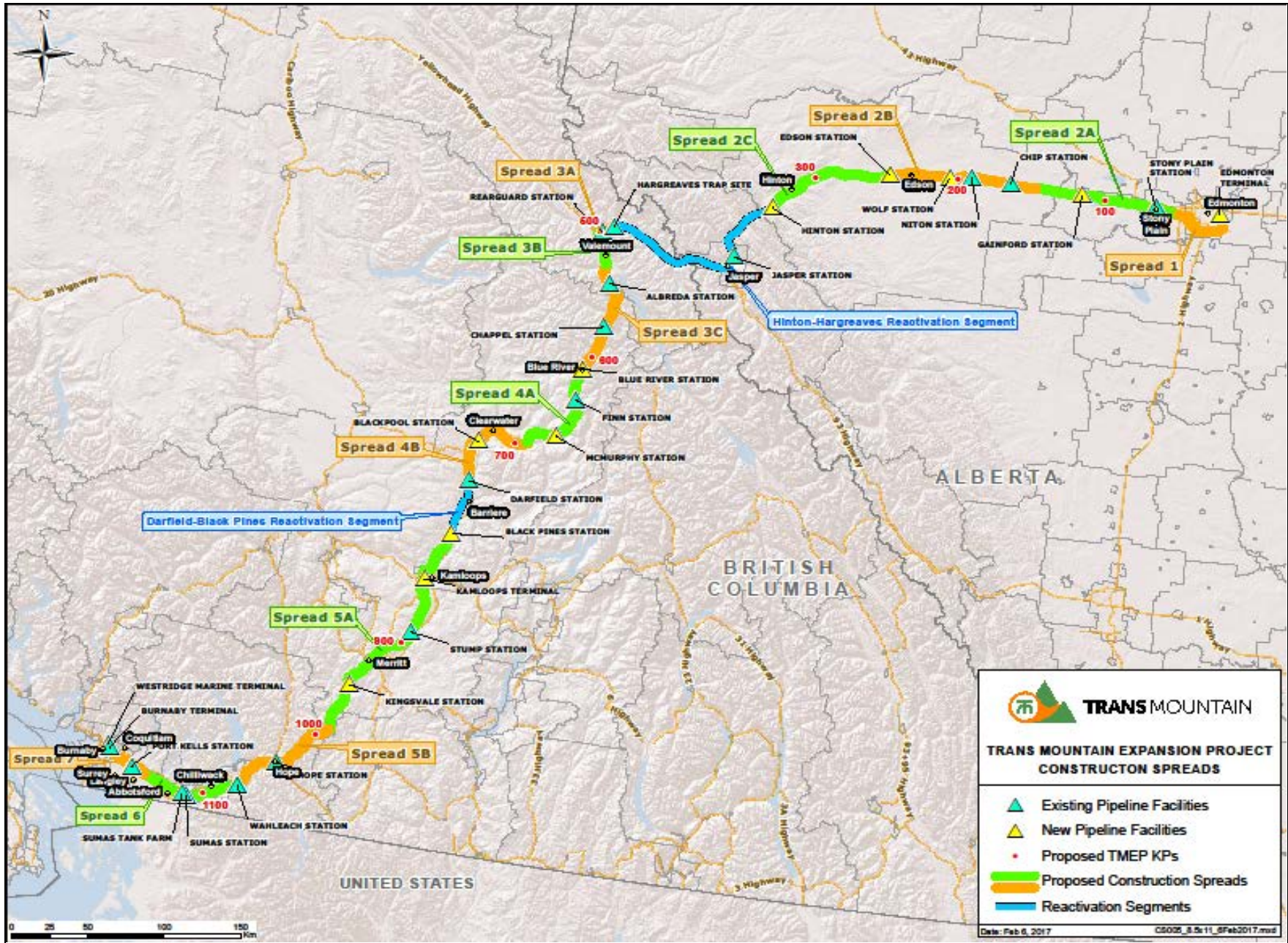
TABLE 3

CAMP LOCATIONS, SIZE AND TYPE

Location	TMEP Spread	Camp ID #	Approx. Location	Land Description	Description	Size (Beds)	Service Type
Village of Valemount	3	VAL026.1	0.4 km east of KP 520 (see Figure 6)	PID 012-173-908 PID 015-200-906	Valemount Camp, Stockpile and Office/Yard	600	Full service
Community of Blue River		BLU007	1.3 km west of KP 610 (see Figure 7)	DL 3285 KDYD	Blue River Camp	550	Full service
District of Clearwater	4	CLE011	1.6km north of KP 720.4 (see Figure 8)	PID 009-303-570	Clearwater Camp 2 Road (Option A)	550	Full service
City of Merritt	5A	MER015	3.1 km west of KP 924.5 (see Figure 11)	PID 012-979-007	Merritt Camp and Office / Yard and Stockpile - Chutter Ranch	400	Full service
Fraser Valley (Tseatah 2 Indian Reserve, Cheam First Nation)	5B	CHE053	2.6 km northwest of KP1075 (see Figure 13)	PIN 15273730 Plan Number: 12TRIR IR Yale Division	Cheam Apple Road Camp	350	Full service

PID = Premises Identification

Figure 1 Construction Spreads



3.2 Context

Trans Mountain's approach to worker accommodation is based on an understanding of existing accommodation/housing capacity in the socio-economic regions and in particular, construction hub communities, balanced against the anticipated non-local/regional workforce required during construction.

Trans Mountain documented extensive information regarding the private, rental and commercial accommodation capacity in construction hub communities in the Facilities Application (the Application), namely in Section 7.2.5 of the Socio-Economic Assessment in Volume 5B in relation to anticipated non-regional workforce for hub communities along the route (Table 7.2.5-4; Filing ID: [A3S1S7](#)). Further detail on housing capacity is found in Section 8.4 and associated Appendices of the Socio-Economic Technical Report in Volume 5D (Filing ID: [A3S2J5](#)) of the Application.

Trans Mountain has continued to monitor and update housing capacity information during the course of construction planning, particularly in smaller communities and in the context of changing economic conditions. Project Contractors who are on-boarding to manage the construction of spreads and facilities will refine workforce estimates and further examine accommodation capacity in the various spread locations along the Project route.

At the time of this submission, Contractors assisting Trans Mountain with construction planning have prepared refined workforce loading estimates, which informs the information provided in the WAS along with other Trans Mountain considerations. Other considerations include workers who may be in the field at any given point in time who would not be captured in the Contractors estimates (e.g., project management, construction management and inspection, etc.).

The construction workforce information contained herein provides an estimate of the workers to be housed along the Project route based on detailed execution plans, schedules and resource loading. All estimates are subject to further refinement as detailed construction planning continues.

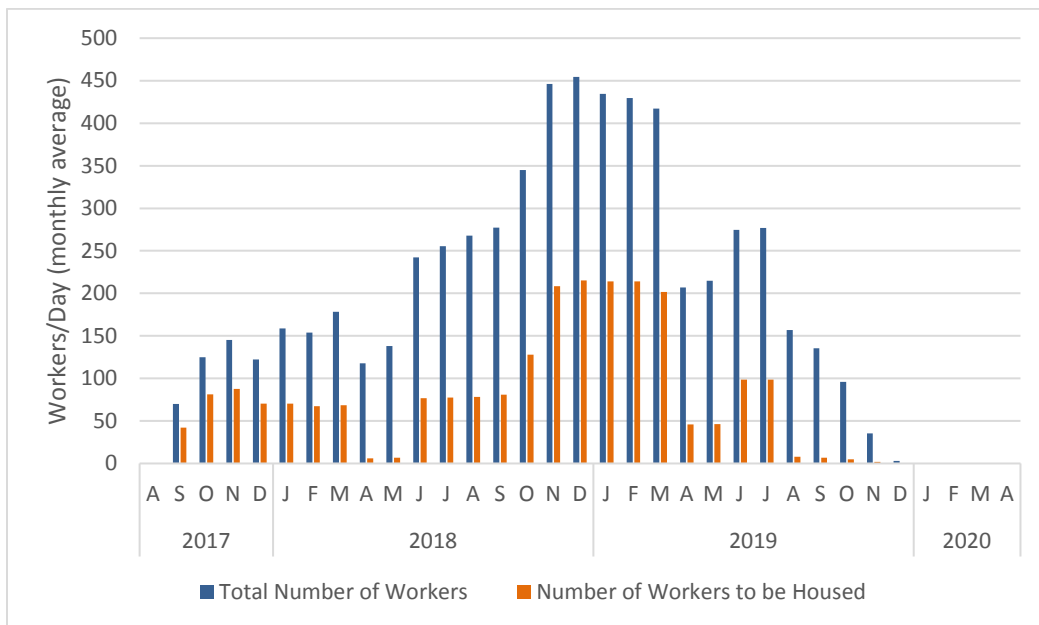
3.3 Spread 1 (Edmonton Region)

3.3.1 *Number of Workers to be Housed*

Over the construction period, there will be workers present in the Spread 1 region from September 2017 until December 2019. The total number of workers in the Spread 1 region during this period will range from a high of 454 workers/month in December 2018 to a low of 3 workers/month in December 2019. It is estimated that non-local workers (*i.e.*, workers to be housed) will be approximately 75% for pipeline construction and 5% for the Edmonton Terminal and Edmonton Pump Station. As such, over this period the number of non-local workers to be housed will range from a high of 215 workers/month in December 2018 to a low of 0 workers/month in December 2019.

Updated workforce loading for the Spread 1 region, indicating the anticipated number of non-local workers to be housed, is shown in Figure 2. This assessment considers workers associated with pipeline and facilities construction (pipeline Spread 1, Edmonton Terminal, Edmonton Pump Station).

Figure 2 Spread 1 – Estimated Number of Workers to be Housed



3.3.2 Proposed Accommodation Approach

For Spread 1, the Project will use a mix of existing accommodation (e.g., hotels, motels, campgrounds, rental units) given the range of housing available in the region.

Edmonton (population of approximately 1.3 million based on the 2016 federal census) has a large commercial accommodation market, with approximately 15,000 hotel rooms and over 10 campgrounds with over 1,100 sites in the surrounding area. There are over 62,000 rental units in the Edmonton area. Given the capacity of the local market and the opportunity to support local business, Contractors will be providing non-local workers a living-out allowance and workers will utilize existing commercial accommodations. Based on extensive rental or temporary accommodation capacity, and that execution of large construction projects is common in Edmonton and surrounding areas, Contractors will provide guidance to workers on availability of local accommodations.

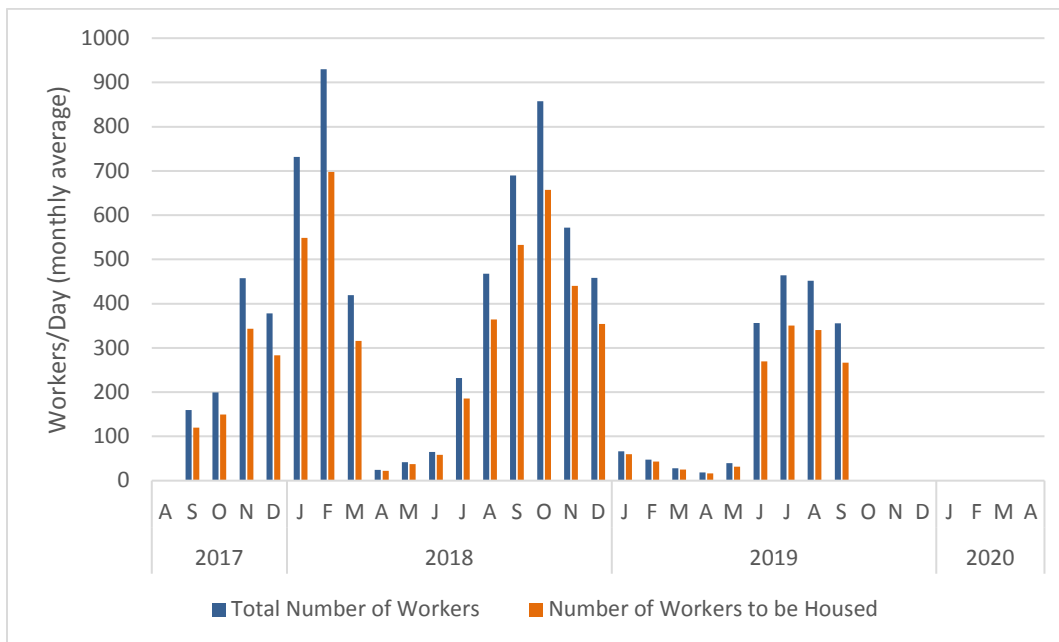
3.4 Spread 2 (Stony Plain, Edson, Hinton)

3.4.1 Number of Workers to be Housed

Over the construction period, there will be workers present in the Spread 2 region from September 2017 until September 2019. The estimated total number of workers in the Spread 2 region during this period will range from a high of 930 workers/month in February 2018 to a low of 18 workers/month in April 2019. It is estimated non-local workers (i.e., workers to be housed) will be approximately 75% of the workforce for pipeline construction and 90% for pump station construction. As such, over this period the number of non-local workers to be housed is anticipated to range from a high of 698 workers/month in February 2018 to a low of 16 workers/month in April 2019.

Updated workforce loading in the Spread 2 region indicating the anticipated number of non-local workers to be housed is shown in Figure 3. This Figure considers workers associated with pipeline and facilities construction (pipeline Spread 2, Gainford Pump Station, Wolf Pump Station, Edson Pump Station, Hinton Pump Station).

Figure 3 Spread 2 – Estimated Number of Workers to be Housed



3.4.2 Proposed Accommodation Approach

For Spread 2, the Project will use a mix of existing accommodation (e.g., hotels, motels, campgrounds, rental units) given the range of housing available in the region.

There are several accommodation hubs in the Spread 2 region - the Town of Stony Plain (population of approximately 17,190 based on the 2016 federal census), the Town of Edson (population 8,410) and the Town of Hinton (population 9,880). The Town of Stony Plain has 2 campgrounds/RV parks with a total of approximately 130 sites as well as approximately six hotels, motels or inns with approximately 800 rooms available. The Town of Edson has over 1,000 units in approximately 20 hotels, motels or inns, and over 20 campgrounds with more than 300 nearby outdoor camping and full hook-up sites in or close to the Town. The Town of Hinton has approximately 800 rooms and 1,200 beds available in hotels/motels.

Given the capacity of the local market and the opportunity to support local business, Contractors will be providing non-local workers a living-out allowance and workers will utilize existing commercial accommodations. As construction planning progresses, the Contractors will conduct additional investigations with local chambers of commerce, hoteliers, RV park managers with the aim of identifying interested suppliers and the Contractor will prepare guidance and specifications for workers with respect to available accommodation venues.

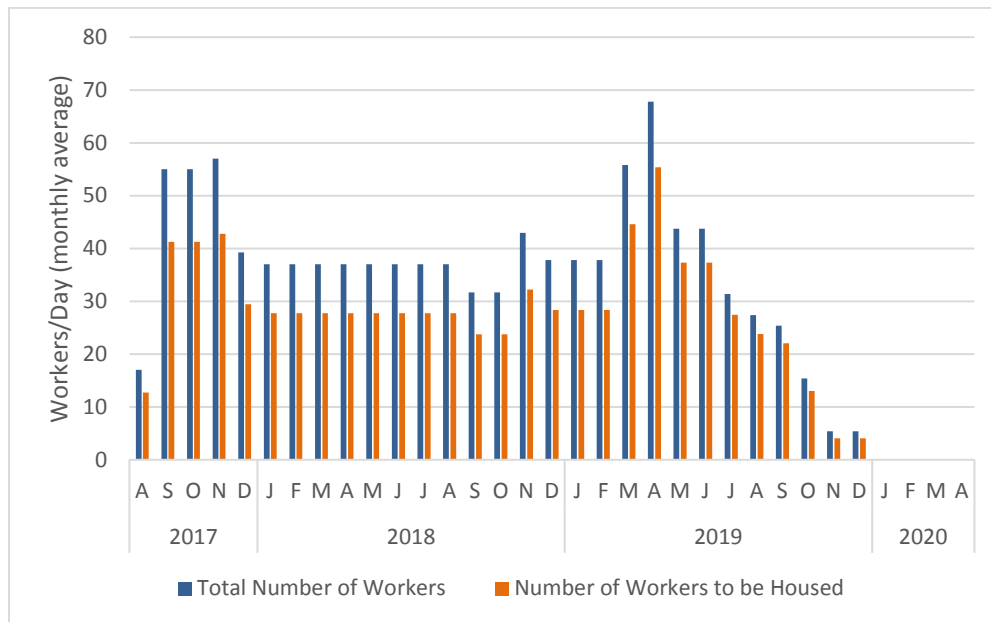
3.5 Hinton to Hargreaves Reactivation Segment (Jasper)

3.5.1 Number of Workers to be Housed

Over the construction period, there will be workers present in the Hinton to Hargreaves reactivation segment from August 2017 to December 2019. The total number of workers in the vicinity of this reactivation segment during this period will range from a high of 68 workers/month in April 2019 to a low of 5 workers/month from November and December 2019. It is estimated that non-local workers (i.e., workers to be housed) will be approximately 75% for reactivation work and 90% for pump station construction/upgrades. As such, over this period the number of non-local workers to be housed will range from a high of 55 workers/month in April 2019 to a low of 4 workers/month in November and December 2019.

Updated workforce loading for the Hinton to Hargreaves reactivation segment indicating the anticipated number of non-local workers to be housed is shown in Figure 4. This Figure considers workers associated with the reactivation of Hinton to Hargreaves pipeline segment, Jasper Pump Station, and the trap site in Hargreaves.

Figure 4 Hinton to Hargreaves Reactivation Segment – Estimated Number of Workers to be Housed



3.5.2 Proposed Accommodation Approach

For the Hinton to Hargreaves reactivation segment, the Project will use a mix of existing accommodation (e.g., hotels, motels, campgrounds, rental units) primarily in the Jasper area, with some workers travelling to Hinton or Valemount for accommodations. The Municipality of Jasper (population of approximately 4,590 based on the 2016 federal census) has approximately 20 hotels/motels and 1,500 rooms. Given the small size of the Project workforce, the capacity of the local markets and the opportunity to support local business, workers will utilize existing commercial accommodations. As construction planning progresses, the Contractors will conduct additional investigations with local chambers of commerce, hoteliers, RV park managers with the aim of identifying interested suppliers and the Contractor will prepare guidance and specifications for workers with respect to available accommodation venues.

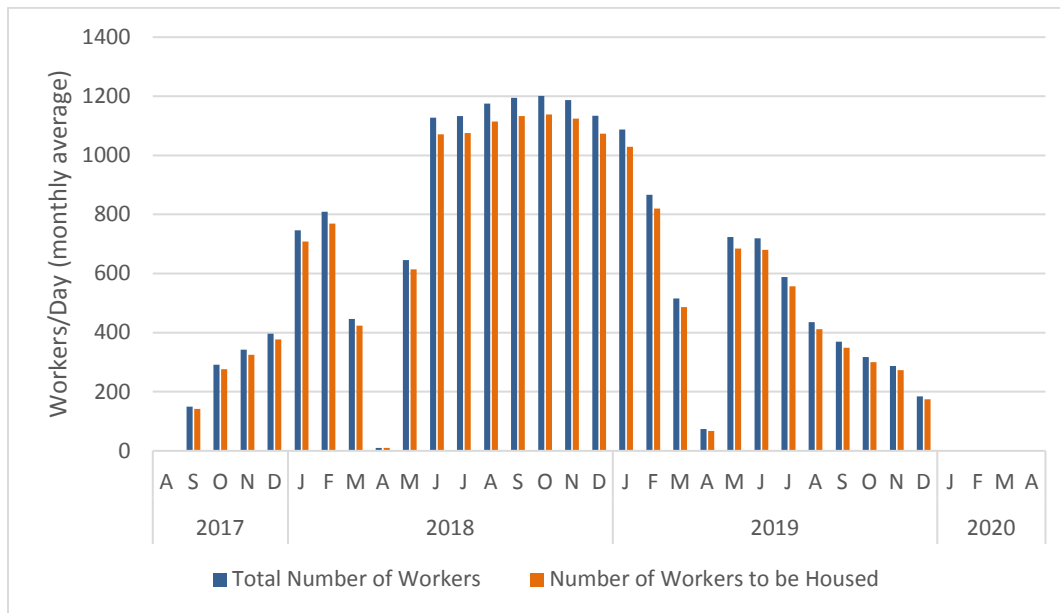
3.6 Spread 3 and 4 (Valemount, Blue River,

3.6.1 Clearwater) Number of Workers to be Housed

Over the construction period, there will be workers present in the Spread 3 and 4 regions from September 2017 until December 2019. Spreads 3 and 4 will be constructed by the same crews working on each spread at different times. The number of workers in the Spread 3 and 4 regions during this period will range from a high of approximately 1,201 workers/month in October 2018 to a low of 10 workers/month in April 2018. It is estimated non-local workers (i.e., workers to be housed) will be approximately 95% for pipeline construction and 90% for pump station construction/upgrades. As such, over this period the anticipated number of non-local workers to be housed will range from a high of approximately 1,138 workers/ month in October 2018 to a low of 10 workers/month in April 2018.

Updated workforce loading in the Spread 3 and 4 region indicating the anticipated number of non-local workers to be housed is shown in Figure 5. This Figure considers workers associated with pipeline construction and facilities construction/upgrades (pipeline Spread 3 and 4, Blue River Pump Station, McMurphy Pump Station, Blackpool Pump Station, electrical and instrumentation control work related to Rearguard Pump Station).

Figure 5 Spreads 3 and 4 – Estimated Number of Workers to be Housed



The anticipated workforce will not be all in one place at any one time (i.e., the peak of 1,201 workers will not occur in a particular community). The work will occur through the region at different times.

3.6.2 Proposed Accommodation Approach

For Spreads 3 and 4, the Project will use a mix of temporary camps and existing accommodation (e.g., hotels, motels, campgrounds, rental units) given the range of housing available in the region.

The Village of Valemount (population approximately 1,020 based on the 2016 federal census) has approximately 600 hotel/motel rooms and 10 campgrounds/RV parks (total 200 sites) as well as about 80 rental units. The community of Blue River (population of approximately 160) is small with limited commercial accommodation facilities (five hotels and one RV Park with 42 sites). The District of Clearwater (population of approximately 2,320) has approximately 230 hotel/motel rooms and 4 campgrounds/RV parks with approximately 330 sites. There is no known rental market in the District of Clearwater. The nearby community of Vavenby has no known hotels/motels or rental capacity.

Camps are planned in the Village of Valemount (with up to approximately 600 beds), the Community of Blue River (up to approximately 550 beds), and in the District of Clearwater (approximately 550 beds). It is important to note that camps will not be required at the start of Project construction activity in this Project region, as the early activity manpower is relatively small in scale compared to available commercial accommodation. Camp accommodations and services will not be required in Valemount and Blue River until Q1 2018 and will not be required in Clearwater until Q2 2018. The people who will be working on site during early activities (including tree clearing for approved sites under the s.58 order, XO-T260-007-2016) will be housed in locally available accommodation, such as hotels, rentals and RV sites, before the camps are developed and operational.

The Valemount Camp is located approximately 0.4 km east of KP 520.0 (as shown in Figure 6). The Blue River camp is located at approximately 1.3 km west of KP 610.0 (as shown in Figure 7). The Clearwater camp is located approximately 1.6 km north of KP 720.4 (as shown in Figure 8).

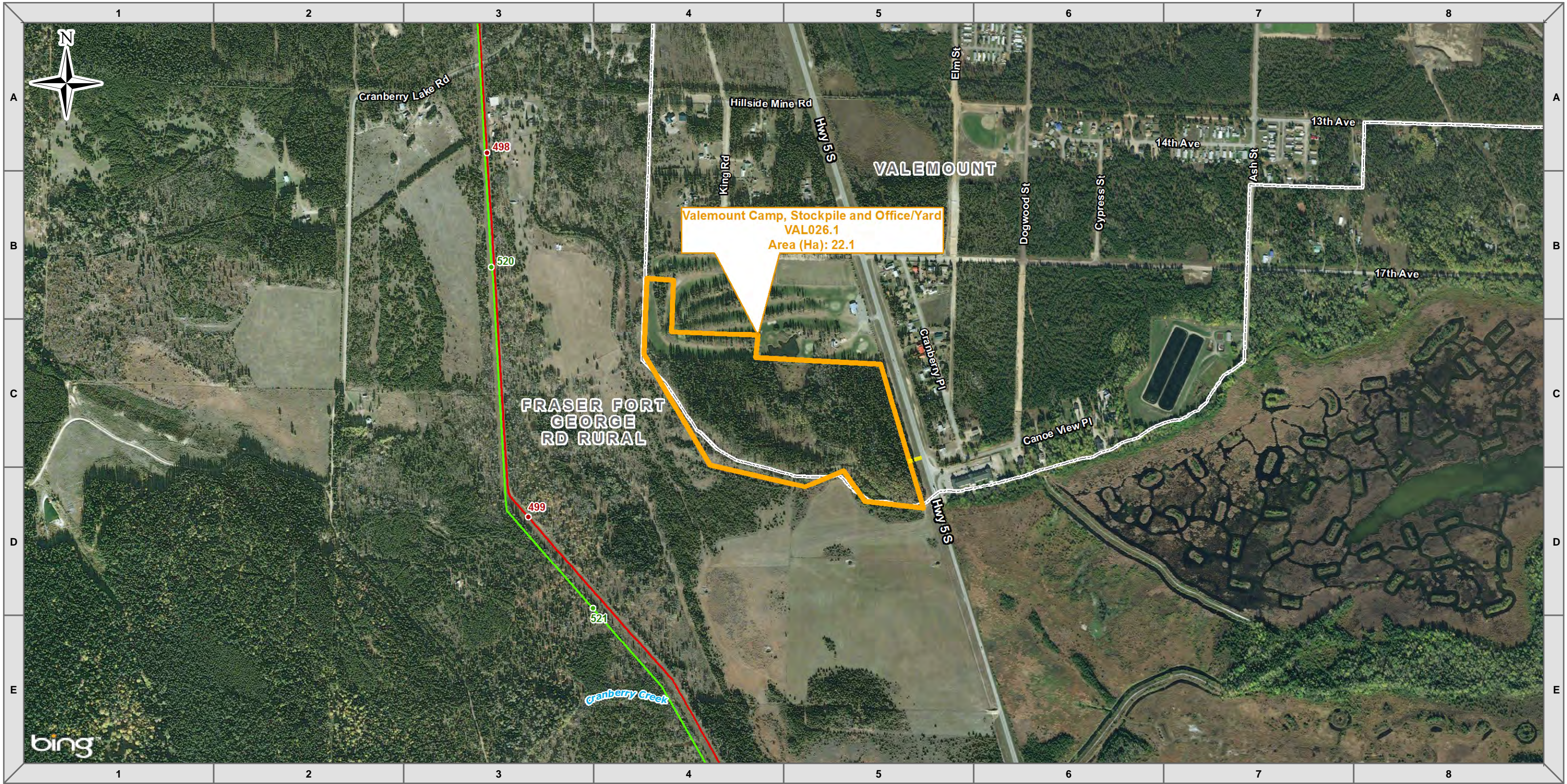
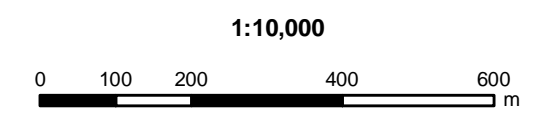


FIGURE 6: CAMP LOCATION - VILLAGE OF VALEMOUNT
TRANS MOUNTAIN EXPANSION PROJECT

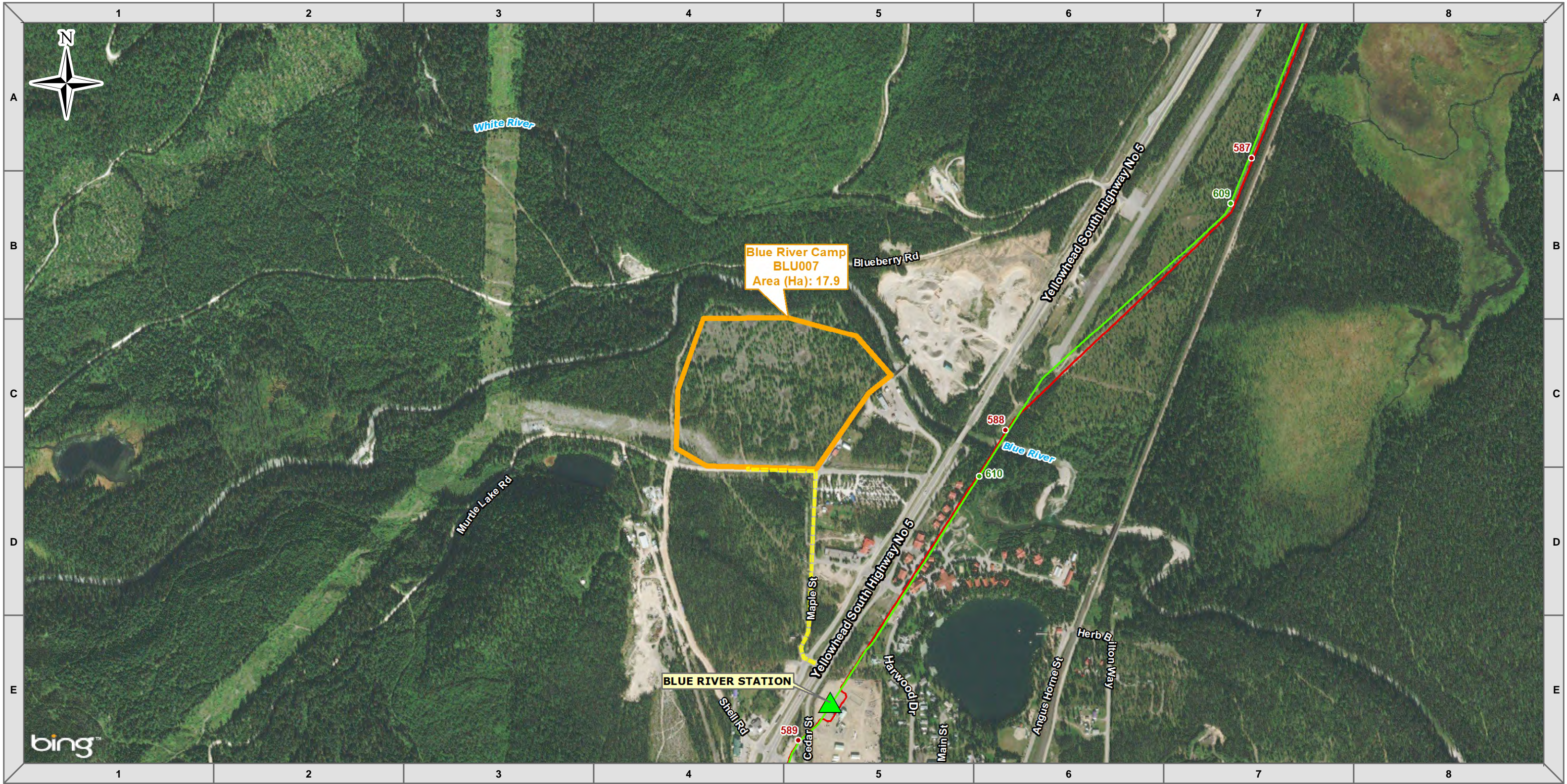
- | | | |
|-------------------------------|--------------------------------|-------------------------|
| Pipeline Facilities | Active Trans Mountain Pipeline | Proposed Camp Locations |
| TMPL Kilometer Posts | Proposed TMEP Centerline | Indian Reserves |
| Proposed TMEP Kilometer Posts | Access Roads | Municipal Boundaries |



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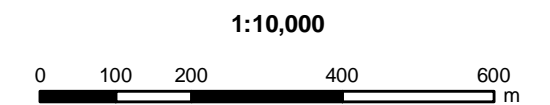


**FIGURE 7: CAMP LOCATION - COMMUNITY OF BLUE RIVER
TRANS MOUNTAIN EXPANSION PROJECT**

- | | | |
|-------------------------------|--------------------------------|-------------------------|
| Pipeline Facilities | Active Trans Mountain Pipeline | Proposed Camp Locations |
| TMPL Kilometer Posts | Proposed TMEP Centerline | Indian Reserves |
| Proposed TMEP Kilometer Posts | Access Roads | Municipal Boundaries |



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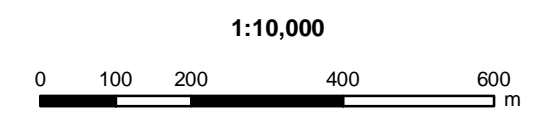


**FIGURE 8: CAMP LOCATION - DISTRICT OF CLEARWATER
TRANS MOUNTAIN EXPANSION PROJECT**

- | | | |
|-------------------------------|--------------------------------|-------------------------|
| Pipeline Facilities | Active Trans Mountain Pipeline | Proposed Camp Locations |
| TMPL Kilometer Posts | Proposed TMEP Centerline | Indian Reserves |
| Proposed TMEP Kilometer Posts | Access Roads | Municipal Boundaries |



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Trans Mountain and its Contractors will continue to work in collaboration with Appropriate Government Authorities and landowners/tenants on operational requirements and permits for the Valemount, Blue River and Clearwater camps.

Depending on the workflow of construction through the spreads, there will be times when there are non-local workers that exceed the temporary camp capacity in the vicinity of a community that will require local accommodation. In those instances, Contractors will be providing non-local workers guidelines on available existing commercial accommodations. As construction planning progresses, the Contractor will conduct additional investigations with local chambers of commerce, hoteliers and RV park managers with the aim of identifying interested suppliers and the Contractor will prepare guidance and specifications for workers with respect to available accommodation venues.

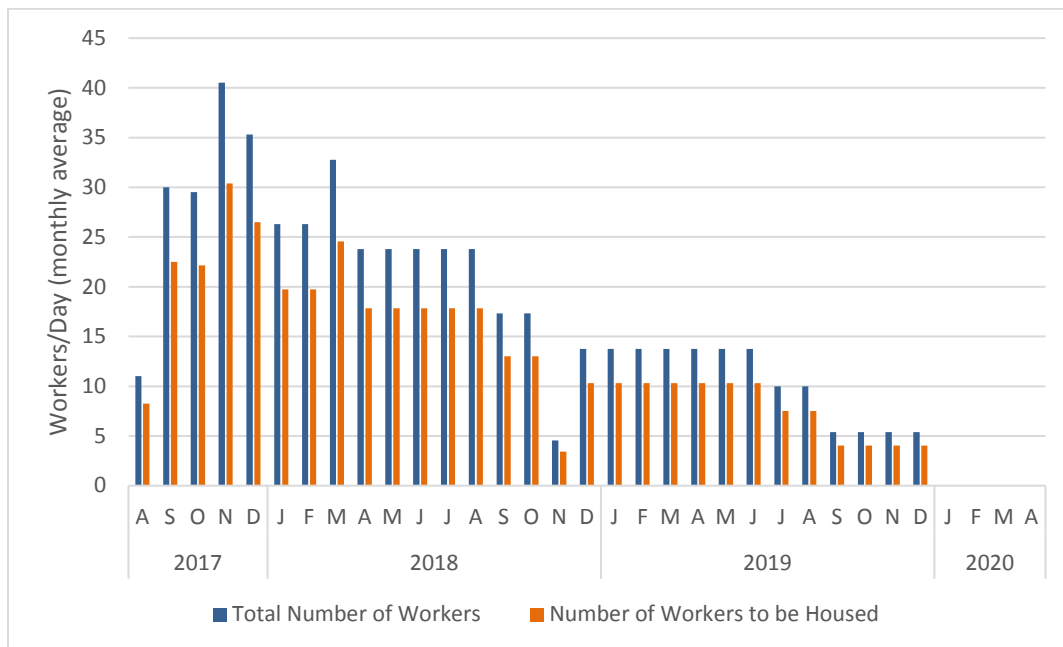
3.7 Darfield to Black Pines Reactivation Segment

3.7.1 Number of Workers to be Housed

Over the construction period, there will be workers present in Darfield to Black Pines reactivation segment from August 2017 until December 2019. The number of workers in this reactivation segment during this period will range from a high of approximately 41 workers/month in November 2017 to a low of 5 workers/month in November 2018 and September to December 2019. It is estimated non-local workers (*i.e.*, workers to be housed) will be approximately 75% for reactivation work and 90% for pump station upgrades. As such, over the period that workers will be in the vicinity of this reactivation segment, the total number of non-local workers to be housed will range from a high of 30 workers/month in November 2017 to a low of 3 workers/month in November 2018.

Updated workforce loading projections in the Darfield to Black Pines reactivation segment indicating the number of non-local workers to be housed is shown in Figure 9. This Figure considers workers associated with the reactivation of Darfield to Black Pines pipeline segment.

Figure 9 Darfield to Black Pines Reactivation Segment – Estimated Number of Workers to be Housed



3.7.2 Proposed Accommodation Approach

The Darfield area is close to the City of Kamloops, which has a large commercial accommodation market, as discussed below in Section 3.8. In addition, the District of Barriere (population of approximately 1,710 based on the 2016 federal census) has approximately two motels and over seven camping and RV sites. Given the capacity of the local market and the opportunity to support local business, workers will utilize existing commercial accommodations. As construction planning progresses, the Contractors will conduct additional investigations with local chambers of commerce, hoteliers, RV park managers with the aim of identifying interested suppliers and the Contractor will prepare guidance and specifications for workers with respect to available accommodation venues.

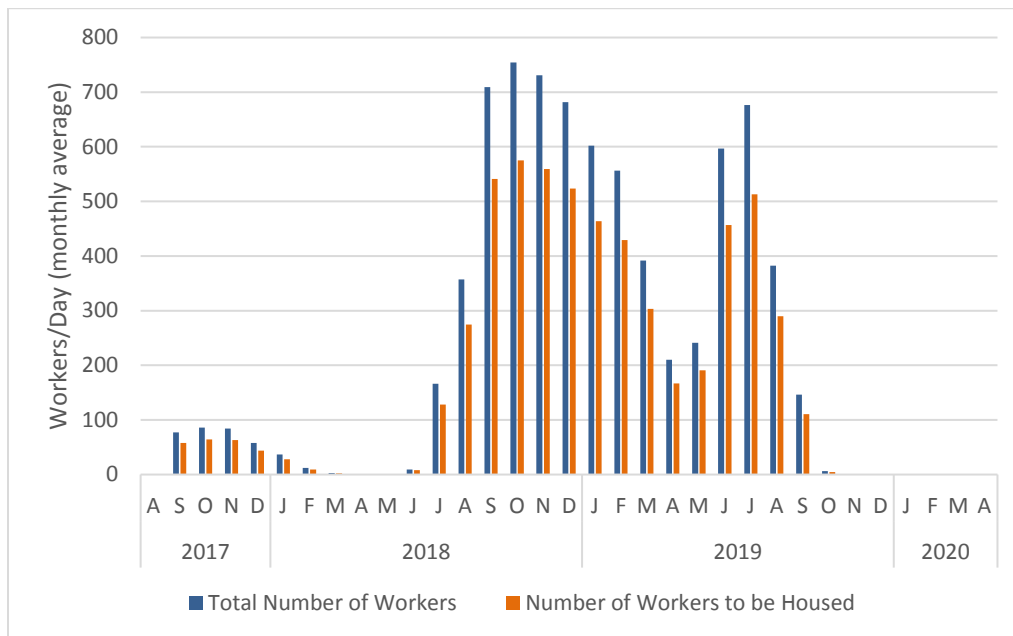
3.8 Spread 5A (Kamloops, Merritt)

3.8.1 Number of Workers to be Housed

Over the construction period, there will be workers present in the Spread 5A region from September 2017 until September 2019. The total number of workers in the Spread 5A region during this period will range from a high of approximately 754 workers/month in October 2018 to a low of 0 workers/month in April and May 2018. It is estimated that non-local workers (*i.e.*, workers to be housed) will be approximately 75% for pipeline construction and 90% for pump station construction. As such, over the period that workers will be in the Spread 5A region the total number of non-local workers to be housed will range from a high of approximately 575 workers/month in October 2018 to a low of 0 workers/month in April and May 2018.

Updated workforce loading in the Spread 5A region indicating the anticipated number of non-local workers to be housed is shown in Figure 10. This considers workers associated with pipeline and facilities construction (pipeline Spread 5A, Black Pines Pump Station [1], Black Pines Pump Station [2], Kamloops Pump Station and Kingsvale Pump Station).

Figure 10 Spread 5A – Estimated Number of Workers to be Housed



3.8.2 Proposed Accommodation Approach

For Spread 5A, the Project will use a mix of existing accommodation (e.g., hotels, motels, campgrounds, rental units) and a temporary camp in Merritt.

Within Spread 5A, the City of Kamloops (population of approximately 90,280 based on the 2016 federal census) has a larger commercial accommodation market than the City of Merritt (population of approximately 7,140). The City of Kamloops has approximately 50 hotels/motel (approximately 3,000 rooms) and 4 campgrounds/RV parks with over 180 sites. In the City of Kamloops and the surrounding area, there are approximately 3,450 rental units. The City of Merritt has commercial accommodation of approximately 300 rooms.

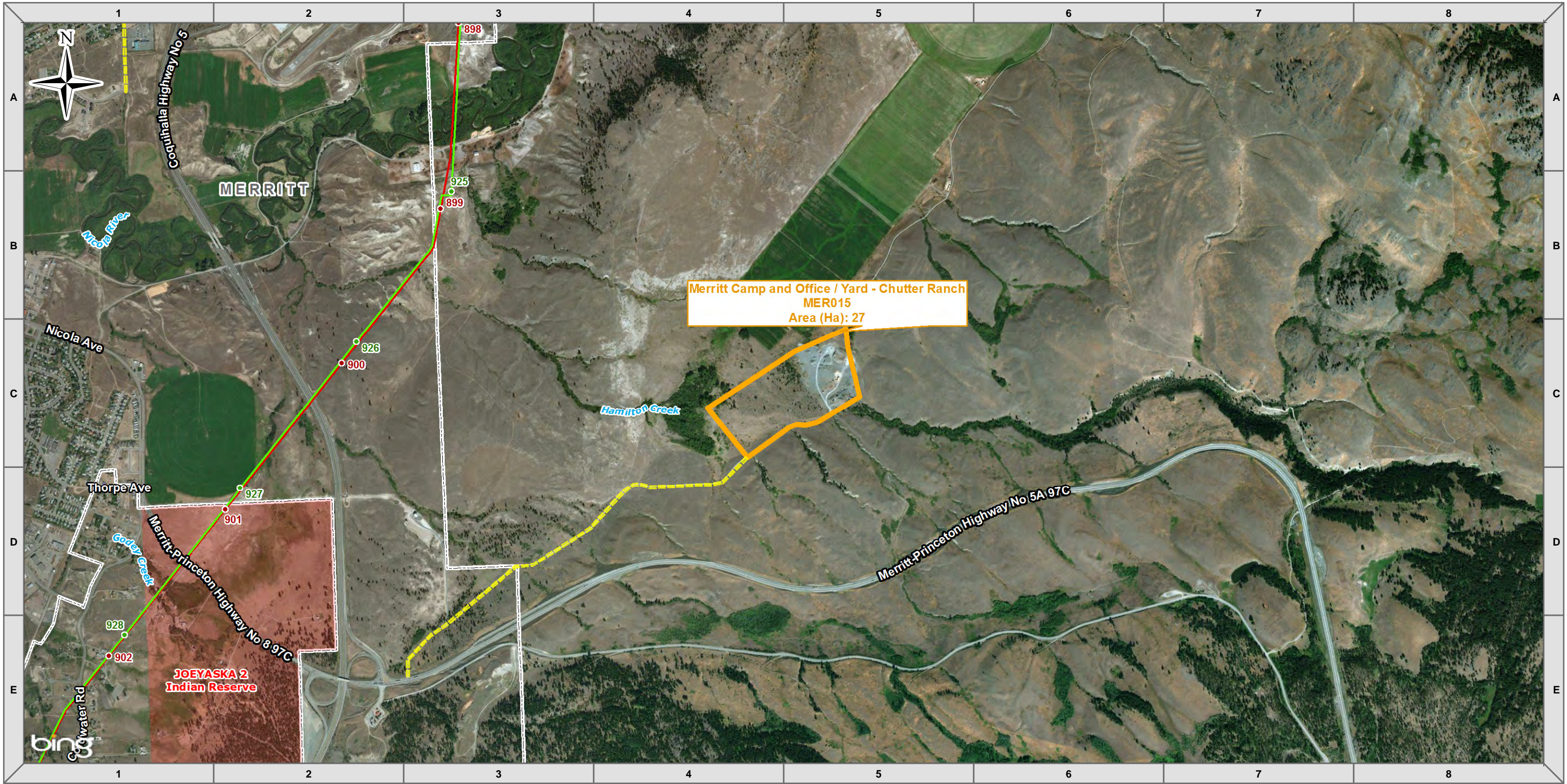
When in the City of Kamloops area of the Spread 5A region, given the capacity of the local market and the opportunity to support local business, workers will utilize existing commercial accommodations. As construction planning progresses, the Contractors will conduct additional investigations with local chambers of commerce, hoteliers, RV park managers with the aim of identifying interested suppliers and the Contractor will prepare guidance and specifications for workers with respect to available accommodation venues.

In vicinity of the City of Merritt, Trans Mountain is proposing to establish a camp designed to accommodate up to 400 workers. It is estimated non-local workers not staying in the camp and seeking accommodation could be approximately 200-300 workers at peak. For non-local workers not staying in camp, the Contractor will conduct additional investigations with the local chamber of commerce, hoteliers and RV park managers with the aim of identifying interested suppliers and the Contractor will prepare guidance and specifications for workers with respect to available accommodation venues.

The Merritt Camp and Office/Yard – Chutter Ranch is located approximately 3.1 km west of KP 924.5 (see Figure 11).

The Merritt camp will not be required at the start of Project construction activity, as the early activity manpower is relatively small in scale compared to available commercial accommodation. Camp accommodations and services will not be required in the Merritt area until Q3 2018. The people who will be working on site during early activities (including tree clearing for approved sites under the s.58 order, XO-T260-007-2016) will be housed in locally available accommodation, such as hotels, before the camp is developed and operational.

Trans Mountain and its Contractors will continue to work in collaboration with Appropriate Government Authorities and landowners/tenants on operational requirements and permits for the Merritt camp.

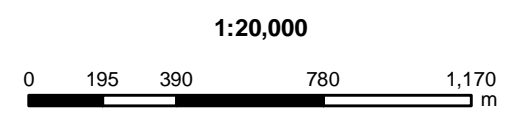


**FIGURE 11: CAMP LOCATION - CITY OF MERRITT
TRANS MOUNTAIN EXPANSION PROJECT**

- | | | |
|-------------------------------|--------------------------------|-------------------------|
| Pipeline Facilities | Active Trans Mountain Pipeline | Proposed Camp Locations |
| TMPL Kilometer Posts | Proposed TMEP Centerline | Indian Reserves |
| Proposed TMEP Kilometer Posts | Access Roads | Municipal Boundaries |



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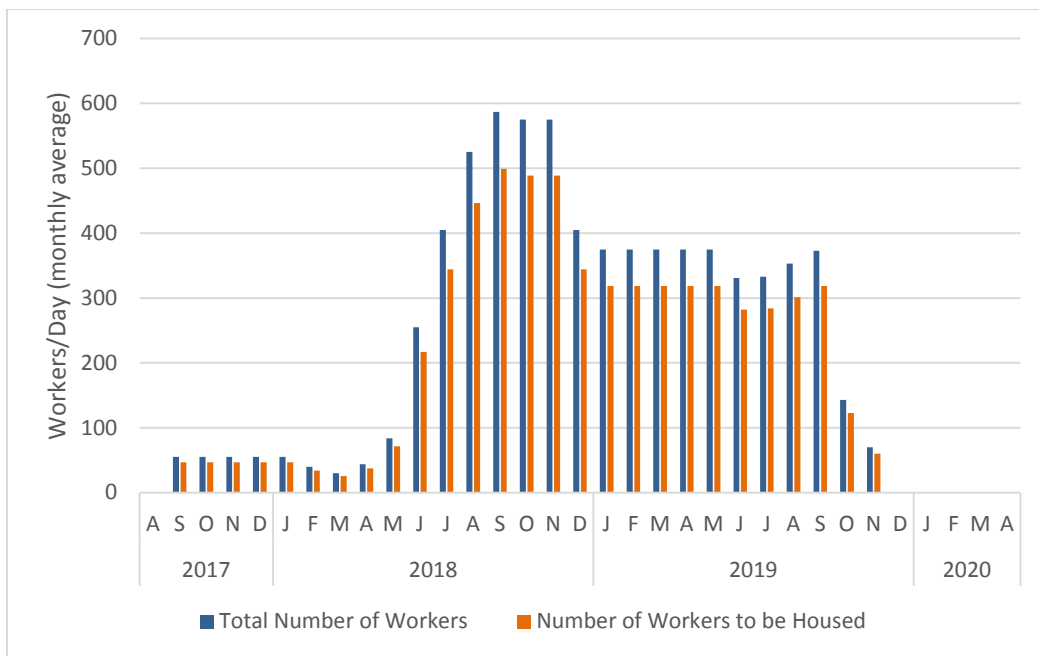
3.9 Spread 5B (Hope)

3.9.1 Number of Workers to be Housed

Over the construction period, there will be workers present in the Spread 5B region from September 2017 until November 2019. The total number of workers in the Spread 5B region during this period will range from a low of approximately 30 workers/month in March 2018 to a high of approximately 587 workers/month in September 2018. It is estimated non-local workers (*i.e.*, workers to be housed) will be approximately 85% for pipeline construction and 90% for pump station upgrades. As such, over the period that workers will be in the District of Hope, the total number of non-local workers to be housed will range from a low of approximately 26 workers/month in March 2018 to a high of approximately 499 workers/month in September 2018.

Updated workforce loading in the Spread 5B region indicating the approximate number of non-local workers to be housed is shown in Figure 12. This Figure considers workers associated with pipeline construction and facility upgrades (pipeline Spread 5B, and pressure control station work associated with the Hope Pump Station).

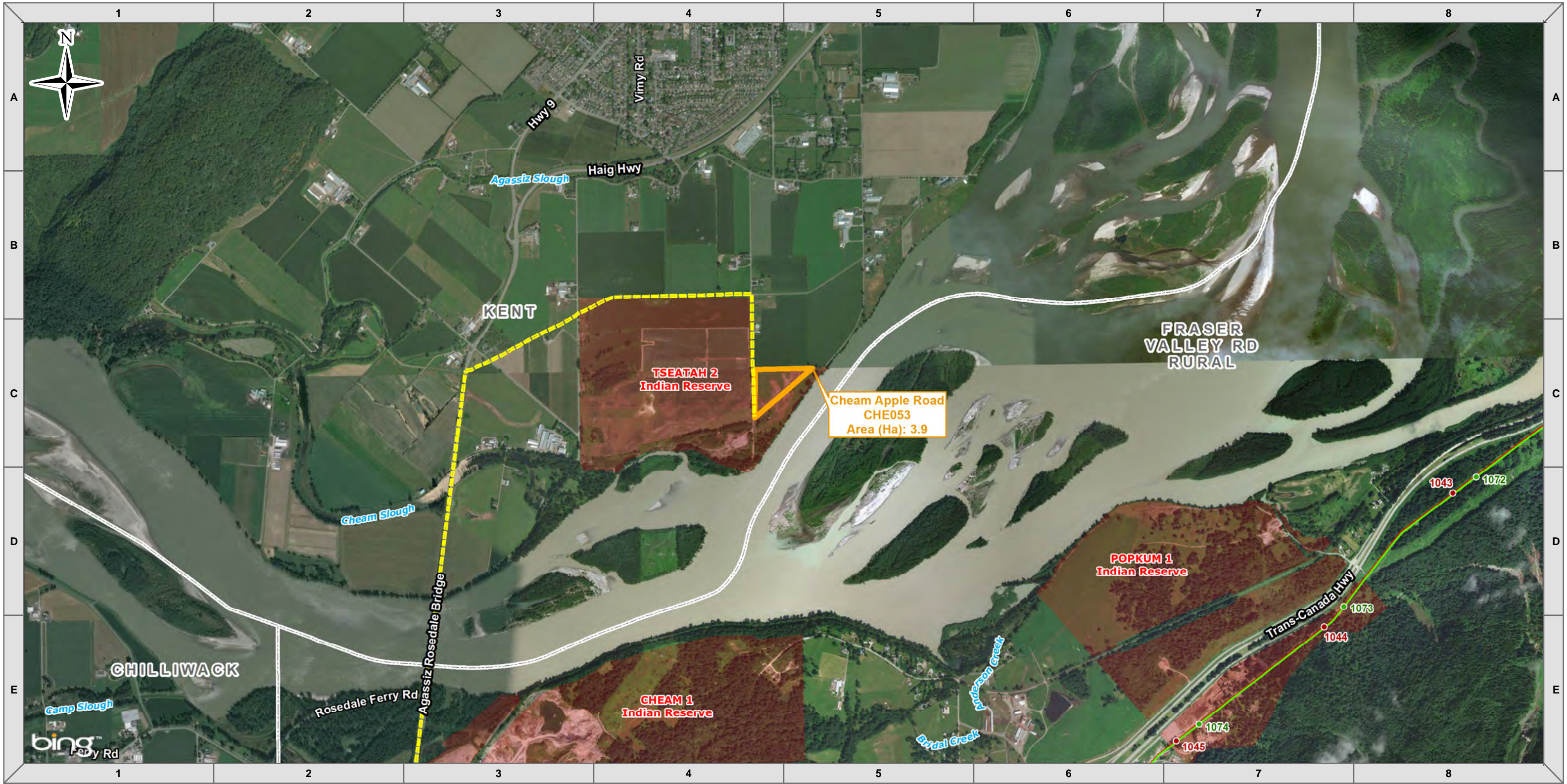
Figure 12 Spread 5B – Estimated Number of Workers to be Housed



3.9.2 Proposed Accommodation Approach

For Spread 5B, the Project will use a mix of existing accommodation (*e.g.*, hotels, motels, campgrounds, rental units) and a temporary camp west of the District of Hope on Cheam First Nation reserve land. The District of Hope (population of approximately 6,180 based on the 2016 federal census) and area have over 400 hotel/motel rooms and over 450 camping and RV sites. A camp with approximately 350 beds is proposed in the vicinity of Hope. The nearby community of Harrison Hotsprings is estimated to have an additional 500 hotel/motel units and 13 campgrounds.

The camp in the vicinity of Hope is the Cheam Apple Road site located approximately 2.6 km northwest of KP 1075 (see Figure 13). It is important to note that the Fraser Valley/Cheam area camp will not be required at the start of Project construction activity, as the early activity manpower is relatively small in scale compared to available commercial accommodation. The camp accommodations and services will not be required in Fraser Valley/Cheam area until Q2 2018. The people who will be working on site during early activities (including tree clearing for approved sites under the s.58 order, XO-T260-007-2016) will be housed in locally available accommodation, such as hotels, rentals and RV sites before the camp is developed and operational.

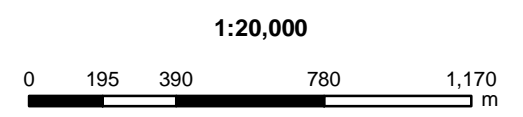


**FIGURE 13: CAMP LOCATION - FRASER VALLEY (CHEAM FIRST NATION)
TRANS MOUNTAIN EXPANSION PROJECT**

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|-------------------------------|--------------------------------|-------------------------|
| Pipeline Facilities | Active Trans Mountain Pipeline | Proposed Camp Locations |
| TMPL Kilometer Posts | Proposed TMEP Centerline | Indian Reserves |
| Proposed TMEP Kilometer Posts | Access Roads | Municipal Boundaries |



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Trans Mountain and its Contractors will continue to work in collaboration with the Cheam First Nation, Appropriate Government Authorities and landowners/tenants on camp site finalization, land acquisition, permitting and operational requirements of the Fraser Valley/Cheam area camp.

Given the capacity of the local market and the opportunity to support local business, for additional non-local workers will utilize existing commercial accommodations. As construction planning progresses, the Contractors will conduct additional investigations with the local chamber of commerce, hoteliers and RV park managers with the aim of identifying interested suppliers and the Contractor will prepare guidance and specifications for workers with respect to available accommodation venues. Consideration will also be given to using accommodation capacity in Chilliwack given its close proximity (within about 30-minute driving distance).

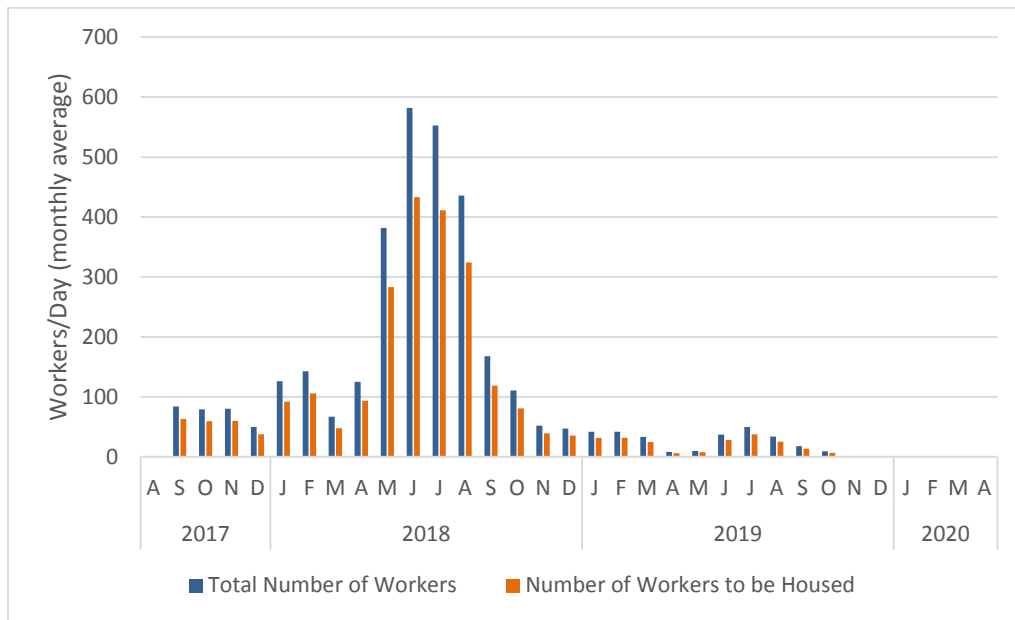
3.10 Spread 6 (Chilliwack, Abbotsford)

3.10.1 Number of Workers to be Housed

Over the construction period, there will be workers present in the Spread 6 region from September 2017 until October 2019. The total number of workers in the Spread 6 region during this period will range from a high of approximately 582 workers/month in June 2018 to a low of 8 workers/month in April 2019. It is estimated non-local workers (*i.e.*, workers to be housed) will be approximately 75% for pipeline construction and 15% for Sumas Terminal. As such, over the period that workers will be in the Spread 6 region the total number of non-local workers to be housed will range from a high of approximately 433 workers/month in June 2018 to a low of 6 workers/month in April 2019.

Updated workforce loading in the Spread 6 region indicating the approximate number of non-local workers to be housed is shown in Figure 14. This Figure considers workers associated with pipeline and facilities construction (pipeline Spread 6, Sumas Terminal).

Figure 14 Spread 6 – Estimated Number of Workers to be Housed



3.10.2 Proposed Accommodation Approach

For Spread 6, the Project will use a mix of existing accommodation (*e.g.*, hotels, motels, campgrounds, rental units) given the range of housing available in the region.

Accommodation hubs in the Spread 6 region include the City of Chilliwack (population of approximately 83,790 based on the 2016 federal census) and the City of Abbotsford (population of approximately 141,400 based on the 2016 federal census). In the City of Chilliwack, there are nine hotels and motels with over 400 units, and 15 campgrounds and RV parks with over 320 units. The City of Abbotsford has

nine hotels and motels with over 500 units. The nearby community of Harrison Hotsprings is estimated to have an additional 500 hotel/motel units and 13 campgrounds.

Given the capacity of the local market and the opportunity to support local business, workers will utilize existing commercial accommodations. As construction planning progresses, the Contractors will conduct additional investigations with local chambers of commerce, hoteliers and RV park managers with the aim of identifying interested suppliers and the Contractor will prepare guidance and specifications for workers with respect to available accommodation venues.

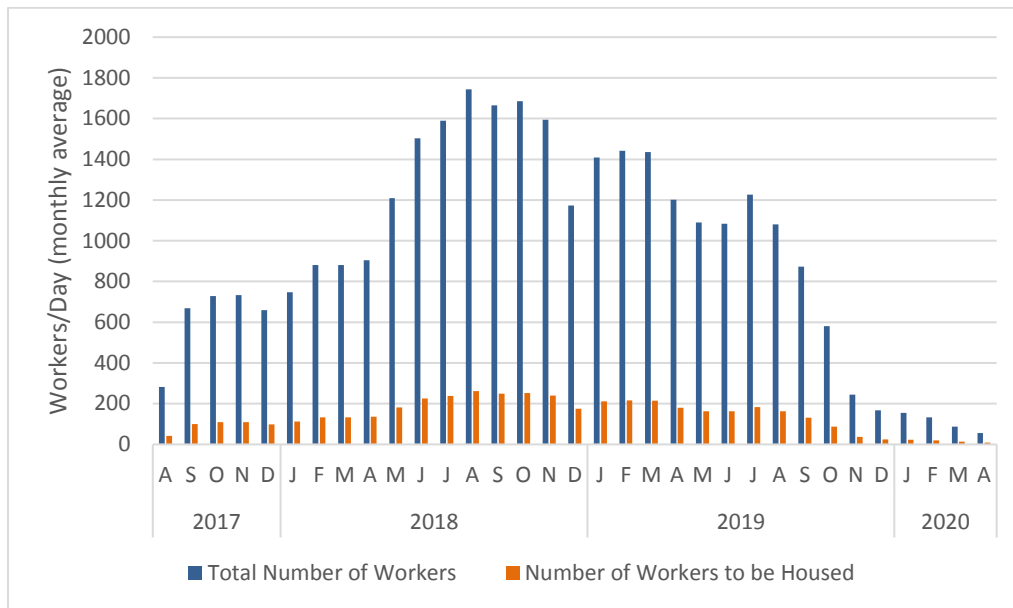
3.11 Spread 7 (Lower Mainland)

3.11.1 Number of Workers to be Housed

Over the construction period, there will be workers present in the Lower Mainland (Metro Vancouver) from August 2017 until April 2020. The total number of workers in Metro Vancouver during this period will range from a high of approximately 1,743 workers/month in August 2018 to a low of 55 workers/month in April 2020. It is estimated non-local workers (*i.e.*, workers to be housed) will be approximately 15%. As such, over the period workers will be in Metro Vancouver the total number of non-local workers to be housed will range from a high of approximately 261 workers/month in August 2018 to a low of 8 workers/month in April 2020.

Updated workforce loading in Metro Vancouver indicating the anticipated number of non-local workers to be housed is shown in Figure 15. This Figure considers workers associated with pipeline and facilities construction (pipeline Spread 7, Burnaby Terminal, Westridge Marine Terminal, Burnaby Mountain Tunnel) as well as management.

Figure 15 Spread 7 – Estimated Number of Workers to be Housed



3.11.2 Proposed Accommodation Approach

The Metro Vancouver area (population of approximately 2.5 million based on 2016 federal census) has a large commercial accommodation market with over 24,000 hotel rooms and approximately 15 campgrounds with over 650 sites in the surrounding area. Given the capacity of the local market and the opportunity to support local business, workers will utilize existing commercial accommodations. As construction planning progresses, the Contractors will conduct additional investigations with local chambers of commerce, hoteliers and RV park managers with the aim of identifying interested suppliers and the Contractor will prepare guidance and specifications for workers with respect to available accommodation venues.

4.0 TEMPORARY CAMPS

4.1 Impact Assessment and Mitigation

Trans Mountain has considered and assessed the environmental and socio-economic impacts of the temporary camps at several junctures, including during initial site selection and also with the context of NEB Condition 60 (Filing ID [A85798](#)), which requires an environmental and socio-economic assessment (ESA) for all temporary construction lands and infrastructure, including temporary camps.

4.1.1 Site-Selection Criteria

Preliminary camp locations, as with all temporary facilities and workspace, are guided by a range of principles in order to reduce environmental and socio-economic impacts. Key site selection criteria used to evaluate and select temporary facility sites, including camps, includes:

- locate temporary facilities that require the use of utilities at sites already serviced by roads and utilities, to the greatest extent possible;
- avoidance, to the extent practical, of areas of native vegetation by maximizing the use of previously cleared or broken lands, or lands currently under industrial land use;
- preferential selection of grassed areas over bush or wooded areas when temporary workspace is necessary on lands supporting native vegetation;
- avoidance, to the extent practical, of known locations that provide site-specific habitat for wildlife species of concern or apply special mitigation;
- avoidance, to the extent practical, of known sites that support vascular plant species of concern or apply special mitigation;
- avoidance, to the extent practical, of steep slopes, organic soils, poorly-drained areas and contaminated areas with health concerns;
- avoidance, to the extent practical, of known areas with heritage resource sites or apply special mitigation;
- avoidance of locations adjacent to a conflicting land use where potential noise, dust or visual concerns could not be readily mitigated;
- avoidance of parks and protected areas; and
- abide by requests of Aboriginal communities, landowners and regulatory authorities, to the extent feasible.

In addition to these criteria used for the sites selection, the following specific conditions are also applied to campsite selection.

- The field should be flat and level, and made of good material such as compacted granular. This type of material is found on former industrial sites.
- Access to and from the camps shall be easy and minimize disturbance to extent practical to local traffic. If possible, the camps will be situated outside towns but still within a reasonable distance, to ensure that local businesses can benefit from the commercial needs of the camp residents.
- The availability of key services such as potable water, or a power or wastewater treatment plant nearby, will be taken into account as secondary criteria.

- After completion of the Project, the site will be returned to its original condition or as per agreement with the owner or the local government.

4.1.2 Environmental and Socio-Economic Assessment

Temporary camps were included in the Environmental and Socio-Economic Assessment (ESA) submitted to the NEB in December 2013 as part of the Application. Trans Mountain provided details of the activities and temporary infrastructure it was proposing to undertake in advance of mainline construction in Volume 4B, Sections 2.1 and 3.0, of the Application (Filing ID: [A3S1K5](#)). At that time, Trans Mountain specified that early activity could include the development of camps, stockpile sites, construction yards, access roads, and clearing outside of the migratory birds restricted activity period. In Appendix A of Volume 4B (Filing ID: [A3S1L0](#)), Trans Mountain provided a proposed list of camp site locations (as well as other early activities such as stock pile site locations, and lists of proposed existing and new temporary and permanent access roads).

Although site-specific information on the camp locations was not confirmed at the time the ESA was prepared, it was assumed that temporary facilities, including temporary camps, would be located in previously disturbed areas within the proposed pipeline route, where possible. Mitigation pertaining to early activity was provided in the Pipeline Environmental Protection Plan (EPP) (Volume 6B, Filing IDs: [A3S2S3](#) and [A3S2S4](#)) and Facilities EPP (Volume 6C, Filing IDs: [A3S2S6](#) and [A3S2S7](#)), including sections for temporary construction camps. Potential residual effects of temporary facilities, including camps, on the biophysical and socio-economic elements were assessed. It was determined in Section 7.3 of Volumes 5A and 5B that the level of mitigation measures applied would ensure that any adverse residual environmental and socio-economic effects associated with temporary facilities, including camps, would be reduced to a level that is not significant.

In August 2015, Trans Mountain conducted an environmental constraints analysis on updated proposed early activity locations to augment the filed ESA, which including several possible camp locations under consideration including a former industrial site south of the Village of Valemount, BC and an industrial site in the community of Vavenby (the District of Clearwater, BC). In this 2015 update, the potential for site-specific interactions was identified with the following environmental and socio-economic elements: vegetation; wetlands; aquatics; wildlife; and heritage resources. No site-specific interactions with early activities, including temporary camp activities, were identified for the remaining biophysical and socio-economic elements. From an environmental assessment perspective, no new potential effects were identified with the preparation, installation and use of early activities, including camps. All temporary camp sites will comply with applicable provincial and federal guidelines and permitting requirements. As such, the conclusions of the significance evaluation of the effects of early activities on the environment remained unchanged. This update was not filed with the NEB; however, its conclusions informed the early works summary in Section 64 of Trans Mountain's reply evidence filed with the NEB (Filing ID: [A4S7F1](#)).

Additional ESA information related to camp locations is included in the Trans Mountain's response to NEB Condition 60, which requires a s.58 ESA (under the *NEB Act*) for all temporary construction lands and infrastructure. Please refer to Trans Mountain's ESA for Temporary Construction Lands and Infrastructure for more details.

4.1.3 Mitigation

Trans Mountain has committed to a range of mitigation measures to reduce and minimize the environmental and socio-economic impacts associated with the proposed temporary construction camps.

Key environmental mitigation, which is outlined in the Temporary Construction Lands and Infrastructure EPP (which is included as part of the NEB Condition 78 Facilities EPP, Filing ID [A84142](#)), specific to temporary construction camps includes the following activities.

- Locate new temporary construction camps on flat, well drained mineral soils (avoid gravel pits unless sewage will be contained), on previously disturbed areas and near existing infrastructure, where feasible.

- Install temporary fencing around construction camps to reduce and deter the attraction of wildlife and to provide security for the site.
- Ensure the wastewater disposal facilities are operated by qualified personnel.
- Collect, transport, store and dispose of solid waste in such a manner that:
 - insects and wildlife are not attracted;
 - disease vectors are eliminated;
 - health and safety hazards do not result;
 - unsightly conditions do not develop;
 - odour emissions are avoided or reduced; and
 - secondary pollution problems do not develop due to runoff, leachates or emissions.
- Ensure that wastes are recycled where practical.
- Store kitchen waste indoors prior to incineration.
- Burn combustible garbage in a camp incinerator designed and operated in accordance with applicable provincial requirements. Compact and haul non-combustible garbage to approved disposal sites.
- Process and dispose of sewage and grey water generated by construction camps in accordance with provincial legislation and requirements.
- Design and operate sewage facilities in accordance with the *BC Sewage Disposal Regulations* and the *BC Industrial Camp Regulations* under the *Public Health Act*. Sewage facilities in camps of more than 100 people are subject to requirements of a permit issued by the regional Health Authority.
- Storage of fuel at construction camps will be limited to quantities required only for the only several days of construction activities. Fuel, oil or hazardous materials required to be stored on-site will be stored within secondary containment that is to be located greater than 100 m from a watercourse, wetland or lake.
- Direct lighting downward and, where feasible, positioned to avoid or reduce interference of wildlife and, if applicable, annoyance of nearby residents and land users.
- Haul potable water to the construction camps or source from permitted wells in accordance with approval conditions.
- Follow the Water Withdrawal and Discharge Procedures Management Plan (see Section 8.6 in Volume 6 of the Environmental Plans).
- Deliver fuel to the storage site at the construction camps by truck from bulk fuel suppliers. Ensure that several days of fuel supply are in place for at least the camp and essential equipment to allow for road closure or slow deliveries due to weather or road conditions.
- Restrict or prohibit leisure hour access to areas where environmentally sensitive habitats, heritage resource sites, or other resources have been specifically identified and formalized in camp rules as areas not to be disturbed.

4.2 Operational Requirements

Contractors are developing camp specifications to ensure the appropriate level of service provision in the camp environment such that socio-economic impacts, in particularly service and infrastructure impacts, on host communities are limited. For example, camp suppliers shall:

- provide a health services room in close proximity to the camp office with emergency medical response supplies, a qualified paramedic or first aid attendant to aid in jobsite and camp emergencies;

- develop an appropriately-scaled Health and Medical Services Plan for construction camps, outlining: requirements for medical personnel onsite; medical emergency response protocols (for different scenarios such as a medical emergency, toxic exposure, etc.); communications in a medical emergency; communicable disease control protocols (including isolation, transport, notification, etc.); health promotion programming; and incident investigation;
- supply modern recreational facilities commensurate with the size and planned duration of the camps; considerations will include equipped workout room, and a games room and entertainment area with large screen TVs;
- ensure the dining area and kitchen meet general industry standards;
- provide laundry facilities as per industry standards;
- ensure camp rooms that meet industry standards (e.g., single sleeping units to include a comfortable single mattress, associated bedding and private or shared washroom/shower units, Wi-Fi, a modern TV and connection to entertainment system; each unit shall be soundproof with minimal room to room noise);
- identify plans for site-specific wastewater and sewer management. The supplier is encouraged to minimize impact on local facilities through the use of camp-specific sewage treatment plants;
- identify plans for site-specific solid waste management. The supplier is encouraged to minimize impact on local facilities through the use of incinerators or other camp-specific systems;
- identify plans for camp-specific supply of potable water, identifying the proposed supply locations, estimated per man day consumption, and the planned on-site storage;
- provide generator sets as the main source of power if connection to local utility grid is not available. The supplier shall identify proposed generator locations, estimated per man day consumption, and the planned on-site operation;
- ensure camp sites are free of any violence, illicit drugs or firearms in accordance with industry requirements and the TMEP Worker Code of Conduct; and
- ensure appropriate camp security, including uniformed security personnel.

Contractors will continue to engage with Appropriate Government Authorities regarding camp operational details, including waste management plans, emergency response protocols, health and medical services requirements and protocols and camp permit requirements.

With respect to waste management, potential impacts related to local and regional waste management services will be evaluated by Trans Mountain as part of the development of location-specific waste management plans for each camp. Trans Mountain will develop waste management plans for each camp, in consultation with Appropriate Government Authorities and in consideration of a location specific assessment of community facility capacities in light of anticipated Project needs. This will occur once Trans Mountain and its Contractors have secured camp suppliers to provide the supply, mobilization and operation of the camps at various locations. Trans Mountain will continue to collaborate with the local government authority in host communities regarding final options for camp waste/septic disposal.

The assessment of potential impacts of waste management services will involve typical industry benchmarking to calculate the initial waste requirements for each camp based on a worst case scenario to operate a self-sustained facility based on camp size.

This includes but not limited to the following assumptions:

- sewage waste export will be factored at 50 to 60 gallons per day per person;
- water import to support the camp will typically be within 5 to 10% greater than the sewage waste factor (55 to 66 gallons +/-); and
- garbage will be calculated at 2 kg per person per day.

Trans Mountain's evaluation will demonstrate consideration of efficiency opportunities that are currently available in today's industry related to reducing waste. This includes but is not limited to the following, which Trans Mountain anticipates would considerably reduce the waste stream compared to industry standards:

- use of low flow fixtures (toilets/sinks/showers);
- high efficiency industrial appliances (dishwashers, washing machines, water tanks etc.);
- recycling and solid waste separation program, including:
 - separate kitchen organics (this waste stream may be accommodated locally);
 - separate recyclables (linked to looking for opportunities to support local charities, e.g., bottle drives); and
 - use compactors to reduce the amount of space and trucks required to haul to other locations if local capacity cannot accommodate.

The evaluation will involve: working with responsible local authorities to compare up-to-date capacity information against waste stream projections, examining regional disposal options where local capacity is limited and examining other mutually-agreeable measures.

Trans Mountain will file the waste management plan for each camp with the NEB as it becomes available and prior to each camp's in-service date, which will include a description of the assessment of the potential impacts related to waste management and a description of all associated mitigation measures. In conjunction, Trans Mountain will also file a consultation update with the NEB on Trans Mountain's consultations with municipal and provincial authorities regarding its waste management plans for each camp.

4.3 Camp Permits

Key permits pertinent to the WAS and the start of Project construction are the principal authorizations from local or provincial authorities required for land access and the commencement of camp site development ("principal authorizations"). Table 4 outlines the status of lease agreements and principal authorizations for each of the five camp sites at the time of this submission.

As discussed previously for each camp site in the context of Section 3.0, camps will not be required at the start of Project construction activity, as the early activity manpower is relatively small in scale. For most Contractors, full camp accommodations and services will not be required until Q2 or Q3 of 2018, the exceptions being the Valemout camp and Blue River camp that may be required by Q1 2018. The people who will be working on site during early activities (including tree clearing for approved sites under the s.58 order, XO-T260-007-2016) will be housed in locally available accommodation, such as hotels, before the camps are developed and operational.

TABLE 4
CAMP AUTHORIZATIONS

Camp	Lease Agreement in Place	Principal Authorization from Local or Provincial Authority Required for Land Access and Commencement of Camp Site Development? If so, Anticipated Schedule	Anticipated Timing of Camp In-Service
Valemount	Yes	No authorization required for land access. Temporary Use Permit required for camp site development; anticipated September 2017.	Q1 2018
Blue River	n/a – Crown Land	Yes – submitted and under review with the BC Oil and Gas Commission; Licence of Occupation anticipated in October 2017.	Q1 2018
Clearwater	Yes	Yes - authorization from the BC Agricultural Land Commission; anticipated by end of September 2017.	Q2 2018
Merritt	Yes	No. Non-farm use approval from BC Agricultural Land Commission previously issued.	Q3 2018
Fraser Valley/Cheam	No, however Trans Mountain has received a Letter of Intent from Cheam First Nation to enter a lease agreement for the identified camp site. Lease agreement anticipated in November 2017.	No.	Q2 2018

As required by NEB Condition 59(iii), Trans Mountain will submit to the NEB:

- a copy of the Agricultural Land Commission authorization for the Clearwater camp site prior to commencing any camp site activity at this site;
- a copy of the Crown Licence of Occupation for the Blue River camp prior to commencing any camp site activity at this site; and
- a copy of the Temporary Use Permit for the Valemount camp upon receipt.

Trans Mountain will update the Board when a lease agreement for the camp in the Fraser Valley/Cheam area is complete and prior to commencing any camp site activity at this site.

Contractors are developing detailed permitting plans related to camp structures and operations and will continue to engage with local and provincial authorities on operational camp permits. Appendix B provides information on potential permits required for each of the five camp locations (Tables B-1 through B-5), noting that the final list of permits is dependent on the operational details of each camp and ongoing engagement with local and provincial authorities.

4.4 Worker Conduct Policies

Trans Mountain has developed a TMEP Worker Code of Conduct, which is attached in Appendix E. The TMEP Worker Code of Conduct outlines expectations and requirements regarding worker conduct for all people engaged in work activity during construction of the Project, including Trans Mountain direct employees and employees and subcontractors of companies contracted by Trans Mountain. This document applies to workers staying in temporary camps. The Worker Code of Conduct outlines expectations with respect to compliance with the law; health, safety and environment; drug and alcohol use; possession of weapons; respectful behaviour; after-hours conduct, etc.

All construction Contractors hired by Trans Mountain shall have a Worker Code of Conduct for employees and subcontracted individuals related to their work on the Project. Each Contractor's Worker Code of Conduct must include the principles, guidance and requirements in the TMEP – Worker Code of Conduct. The Contractor's Worker Code of Conduct shall also apply to their subcontractors. The requirements of workers, including the Worker Code of Conduct and associated policies, will be covered during the worker orientation program.

Trans Mountain confirms that all policies relating to the camps will be provided to workers.

Trans Mountain confirms that the proposed TMEP Worker Code of Conduct was made available to all local communities and other relevant service providers in proximity to camp communities by way of issuance of the draft WAS for review. Trans Mountain confirms it will make the final TMEP Worker Code of Conduct similarly available to all local communities and other relevant service providers in proximity to camp communities.

5.0 SUMMARY

TMEP will use a mixed approach to worker accommodation in response to the varying capacities and interests of communities and regions along the Project. This approach will balance the positive impact of economic benefits for local accommodation, retail, and service providers with concerns about increasing demand on accommodation and housing that may impact non-Project users.

Worker accommodation will include the use of:

- full service camps in the vicinity of Valemount, Blue River, Clearwater, Merritt and Fraser Valley/Cheam area of BC; and
- a mixture of accommodation options in other communities including: extended stay hotels and motels; RV parks; apartment style rental units; B&B facilities; and lodging in private residences.

In non-camp communities or where non-local workers will require accommodation, Contractors will conduct additional investigations with local chambers of commerce, hoteliers and RV park managers with the aim of identifying interested suppliers, and Contractors will prepare guidance and specifications for workers with respect to available accommodation venues.

All camps will be required to have an appropriately scaled Health and Medical Services Plan, as well as plans for site-specific wastewater and sewer management; potable water; solid waste, utility or generators as the main source of power; and camp security.

Trans Mountain has developed a TMEP Worker Code of Conduct, which outlines expectations and requirements regarding worker conduct for all people engaged in work activity during construction of the Project. All workers are ambassadors of the Project and are expected to act accordingly. The Worker Code of Conduct outlines expectations with respect to compliance with the law; health, safety and environment; drug and alcohol use; possession of weapons; respectful behaviour; after-hours conduct, and other matters.

APPENDIX A

CONSULTATION AND ENGAGEMENT

Consultation and engagement activities related to the Worker Accommodation Strategy (WAS) were completed with appropriate municipal and provincial authorities. Opportunities to discuss worker accommodation and identify issues or concerns were also provided to public stakeholders during meetings, workshops and ongoing engagement activities.

Consultation and engagement opportunities began in May 2012 with the Project announcement and are ongoing.

1.0 Consultation and Engagement Overview: Draft WAS Development

Reports on public consultation activities completed between May 2012 and June 30, 2015 were filed with the National Energy Board (NEB) and are available in the Application (Volume 3A: Stakeholder and Volume 3B: Aboriginal; Filing ID [A55987](#)) as well as in Consultation Update No. 1 and Errata, Technical Update No. 1 (Filing ID [A59343](#)) / Consultation Update 2 (Filing IDs [A62087](#) and [A62088](#)), Consultation Update 3 (Filing IDs [A4H1W2](#) through [A4H1W8](#)) and Consultation Update 4 (Filing ID [A72224](#)). These reports include results of consultation conducted to date, identification of issues and concerns as well as Trans Mountain's response and are included below. Where appropriate, Trans Mountain's response has been updated to reflect information developed since the original response was provided during the NEB proceeding for the Project.

Consultation and engagement activities completed between July 1, 2015 and June 2017 have not been filed on the public record with the NEB. Any new issues and concerns identified during this period, as well as Trans Mountain's response, are described below.

2.0 Consultation and Engagement Overview: Draft WAS

The draft WAS was released for review and feedback on February 8, 2017. The comment period closed on April 12, 2017, although additional municipal and provincial government authority feedback was incorporated up until June 2017. Email or mail notification regarding the Plan was sent to 43 public stakeholders, 16 Appropriate Government Authorities, 18 Aboriginal groups and all affected landowners. The notification included a summary description of the WAS, a request for review, the timing of the comment period and contact information. See Appendix C for a complete list of notified stakeholders and Appendix D for a list of notified Aboriginal groups.

The draft BC Environmental Assessment Office (EAO) WAS (as per BC EAO Condition 23) was also circulated for comment and feedback on March 15, 2017 for a 45-day comment period. The draft BC EAO WAS contained further information about camp locations, Aboriginal groups within whose boundary or asserted or established traditional territory or treaty lands a camp has been proposed, and distances between Aboriginal communities and camps. The draft BC EAO WAS was circulated to select provincial (BC), municipal and regional government authorities and select Aboriginal groups.

In addition to direct notification, the online posting of each Plan was promoted through Trans Mountain's weekly e-newsletter, Trans Mountain Today, which provides Project updates, regulatory information, stories and interviews to more than 6,000 subscribers. Each week Trans Mountain Today included a focus on a specific plan, or group of plans, as well as a reminder of all plans available for review.

2016

- September 22 - Wildlife Mitigation and Habitat Restoration Plans
- September 29 - Pipeline Environmental Protection Plans
- October 6 - Air Quality Management Plans
- October 13 - Watercourse and Water Ecosystems Plans
- October 20 - Vegetation Management Plans
- October 27 - Air Quality Plans

- November 3 - Socio-Economic Effects Monitoring Plan
- November 10 - Access Management Plan
- December 22 - General promotion all plans
- December 29 - General promotion all plans

2017

- January 5 - General promotion all plans
- January 12 - General promotion all plans

Trans Mountain is committed to ongoing engagement throughout the life of the Project. The start and end date for the review and comment period for each environmental management plan is defined. These timelines are required to allow time for preparation of the final Plan in order to meet regulatory requirements and NEB submission dates.

As camp locations have evolved, Trans Mountain has kept municipal and regional authorities, potentially affected Aboriginal groups, and affected landowners and tenants informed through in-person meetings, by mail drop, email and phone. Trans Mountain will notify potentially affected Aboriginal groups, local and regional governments, and landowners about the proposed final Fraser Valley/Cheam camp location, with the invitation to provide comments on the final location.

3.0 Consultation and Engagement: Activities and Feedback

Consultation and engagement activities completed with identified stakeholder groups are described below, including: public stakeholders (Section 3.1); Appropriate Government Authorities (Section 3.2); Aboriginal groups (Section 3.3); and landowners/tenants (Section 3.4).

Feedback on the draft WAS, Trans Mountain’s response, and where each issue or concern is addressed in the WAS has been outlined in each section according to stakeholder group.

3.1 Public Consultation

3.1.1 Public Consultation Summary – May 2012 to June 2015

Feedback regarding worker accommodation received during public consultation and engagement activities between May 2012 and June 30, 2015 is summarized in Table A-1.

TABLE A-1

SUMMARY OF PUBLIC CONSULTATION – MAY 2012 TO JUNE 30, 2015

Issues or Concern	Summary Trans Mountain Response	Where Addressed
Potential housing shortage in Valemount due to workers using local accommodation during construction. Request for Trans Mountain to consider request for investment in local low income housing.	The Project team continues to dialogue with the stakeholders regarding suggestions raised by the Mayor of Valemount. A temporary worker camp will be used in the Village of Valemount to offset Project-related accommodation demand.	Application Volume 5B – ESA Section 7.0: Socio-Economic Effects Assessment NEB Condition 59 Worker Accommodation Strategy (Section 3.0).
Consider letting the community (Valemount) develop a bid to collectively offer accommodation and meals rather than have a camp.	Trans Mountain’s Worker Accommodation Strategy considers a range of housing options, including temporary camps, use of hotels/motels, and working with regional organizations to identify/extend RV spaces. A camp will be used in Valemount of off-set demand for housing.	Application Volume 5B – ESA Section 7.0: Socio-Economic Effects Assessment NEB Condition 59 Worker Accommodation Strategy (Section 3.0).

TABLE A-1 Cont'd

Issues or Concern	Summary Trans Mountain Response	Where Addressed
Request for a better understanding of the size of the camp in Vavenby.	The camp proposed in the District of Clearwater (closest to Vavenby) is anticipated to have approximately 350 beds.	NEB Condition 59 Worker Accommodation Strategy (Section 3.0).
How will the communities participate in the discussion around accommodation?	Engagement and dialogue will continue with communities and stakeholders. Project update meetings in communities, which will include information and discussion on workforce hosting and accommodations, occurred in Q1 2017. Engagement with communities and municipal and provincial authorities around worker accommodation plans will continue through Q2 to Q4 2017 and beyond.	Application Volume 3A – Public Consultation Table 1.7.2 NEB Condition 59 Worker Accommodation Strategy (Appendix A).
How will TMEP deal with social challenges associated with hosting workers during construction?	Trans Mountain recognizes that the construction of the Project will require a large workforce and may exert an influence on socio-economic outcomes in nearby communities. The effects of an influx in temporary workers would primarily manifest in those communities acting as a construction hub for construction workers and in particular, those communities that have relatively small resident populations compared to the size of the temporary Project workforce. Trans Mountain has developed a Socio-Economic Effects Monitoring Plan to monitor and respond to adverse socio-economic effects that may occur during construction, including those associated with workforce hosting.	NEB Condition 13 Socio-Economic Effects Monitoring Plan
Socio-economic impacts of an influx of workers in Hope.	Trans Mountain has developed a Socio-Economic Effects Monitoring Plan to monitor and respond to adverse socio-economic effects that may occur during construction, including those associated with workforce hosting. Trans Mountain will use a temporary work camp in Hope to reduce Project-related demands on local accommodation. Trans Mountain also has a Worker Code of Conduct to guide appropriate conduct for all workers while on and off-duty.	NEB Condition 13 Socio-Economic Effects Monitoring Plan NEB Condition 59 Worker Accommodation Strategy (Section 3.9 and Appendix E)
Impacts of workers using local accommodation and the timing overlap with peak-capacity seasons.	Trans Mountain's approach to worker accommodation considers the accommodation capacities of the various communities along the Project route. Temporary camps will be used in select locations to offset Project-related demand on local accommodations. Camps will be used in Valemount, Blue River, Clearwater, Merritt and Hope. Trans Mountain is developing a Socio-Economic Effects Monitoring Plan to monitor and respond to adverse socio-economic effects that may occur during construction, including those associated with workforce hosting.	NEB Condition 59 Worker Accommodation Strategy (Section 3.0). NEB Condition 13 Socio-Economic Effects Monitoring Plan
Interest in community workforce accommodation for managers and inspectors.	The Project's approach to worker accommodation is outlined in the Worker Accommodation Strategy.	NEB Condition 59 Worker Accommodation Strategy
Temporary need for extra resources (<i>i.e.</i> , emergency and health services) as a result of workforce hosting.	Trans Mountain will ensure Camp Operators develop a Health and Medical Services Plan for construction camps and will ensure Pipeline Contractors include consideration for health and medical services within their Health and Safety Management and Emergency Management Planning. Trans Mountain has developed a Socio-Economic Effects Monitoring Plan to monitor and respond to adverse socio-economic effects that may occur during construction, including those associated with workforce hosting. This includes monitoring indicators related to the Project use of health and medical services.	NEB Condition 13 Socio-Economic Effects Monitoring Plan (Table 3)
Ensuring that community businesses and services are able to meet the needs for supplies (<i>i.e.</i> , information sharing with the pharmacy, so that insulin and other medications are available).	Trans Mountain is sharing its worker accommodation approach well in advance of construction to aid in community readiness. The draft worker accommodation strategy provided a basis for engagement with appropriate municipal or provincial authorities, communities and landowners/tenants, and to allow advancement of discussions about camp siting, permits and operational plans, as well as to facilitate business and use planning with local and regional accommodation and other service providers.	NEB Condition 59 Worker Accommodation Strategy
Added financial burden to communities due to workforce hosting.	Trans Mountain has developed a Socio-Economic Effects Monitoring Plan to monitor and respond to adverse socio-economic effects that may occur during construction, including those associated with workforce hosting. One of its objectives is to identify and respond to any unanticipated socio-economic issues that may arise during construction and ensure mitigation is working as planned.	NEB Condition 13 Socio-Economic Effects Monitoring Plan

TABLE A-1 Cont'd

Issues or Concern	Summary Trans Mountain Response	Where Addressed
<p>Accommodation capacity concerns and impact to the tourism sector as a result of workers staying in hotels and/or campgrounds.</p>	<p>Trans Mountain's proposed approach to worker accommodation considers the accommodation capacities of the various communities along the Project route. Temporary camps will be used in select locations to offset Project-related demand on local accommodations. Camps will be used in Valemount, Blue River, Clearwater, Merritt and Hope.</p> <p>Trans Mountain has developed a Socio-Economic Effects Monitoring Plan to monitor and respond to adverse socio-economic effects that may occur during construction, including those associated with workforce hosting.</p>	<p>NEB Condition 59 Worker Accommodation Strategy (Section 3.0)</p> <p>NEB Condition 13 Socio-Economic Effects Monitoring Plan</p>
<p>Rental property availability during construction.</p>	<p>Trans Mountain's proposed approach to worker accommodation considers the accommodation capacities of the various communities along the Project route. Temporary camps will be used in select locations to offset Project-related demand on local accommodations. Camps will be used in Valemount, Blue River, Clearwater, Merritt and Hope.</p> <p>Trans Mountain is developing a Socio-Economic Effects Monitoring Plan to monitor and respond to adverse socio-economic effects that may occur during construction, including those associated with workforce hosting.</p>	<p>NEB Condition 59 Worker Accommodation Strategy (Section 3.0)</p> <p>NEB Condition 13 Socio-Economic Effects Monitoring Plan</p>
<p>Potential housing price increases during construction will impact low income housing availability.</p>	<p>Trans Mountain's approach to worker accommodation considers the accommodation capacities of the various communities along the Project route. Temporary camps will be used in select locations to offset Project-related demand on local accommodations. Camps will be used in Valemount, Blue River, Clearwater, Merritt and Hope.</p> <p>Trans Mountain is developing a Socio-Economic Effects Monitoring Plan to monitor and respond to adverse socio-economic effects that may occur during construction, including those associated with workforce hosting.</p>	<p>NEB Condition 59 Worker Accommodation Strategy (Section 3.0)</p> <p>NEB Condition 13 Socio-Economic Effects Monitoring Plan</p>
<p>Cumulative impact of the number of workers in the local area given that other projects may be operating at the same time.</p>	<p>Trans Mountain's proposed approach to worker accommodation considers the accommodation capacities of the various communities along the Project route. Temporary camps are being proposed in select locations to offset Project-related demand on local accommodations. Temporary camps will be used in Valemount, Blue River, Clearwater, Merritt and Hope.</p> <p>Trans Mountain is developing a Socio-Economic Effects Monitoring Plan to monitor and respond to adverse socio-economic effects that may occur during construction, including those associated with workforce hosting.</p>	<p>NEB Condition 59 Worker Accommodation Strategy (Section 3.0)</p> <p>NEB Condition 13 Socio-Economic Effects Monitoring Plan</p>
<p>Stony Plain/Spruce Grove has limited resources to hotel/house workers and certain hotels are used to house vulnerable populations, which may be put at risk if hotels were to be used by workers.</p>	<p>Contractors in this area will conduct additional investigations with local chambers of commerce, hoteliers, RV park managers with the aim of identifying interested suppliers and the Contractor will prepare guidance and specifications for workers with respect to available accommodation venues.</p> <p>Trans Mountain is developing a Socio-Economic Effects Monitoring Plan to monitor and respond to adverse socio-economic effects that may occur during construction, including those associated with workforce hosting.</p>	<p>NEB Condition 59 Worker Accommodation Strategy (Section 3.0)</p> <p>NEB Condition 13 Socio-Economic Effects Monitoring Plan</p>
<p>From a policing perspective, the community would expect TMEP to be self-sufficient in terms of managing worker conduct.</p>	<p>Trans Mountain has developed a TMEP Worker Code of Conduct, which is attached in Appendix E. The TMEP Worker Code of Conduct outlines expectations and requirements regarding worker conduct for all people engaged in work activity during construction of the Project, including Trans Mountain direct employees and employees and subcontractors of companies contracted by Trans Mountain.</p> <p>All construction Contractors hired by Trans Mountain shall have a Worker Code of Conduct for its employees and subcontracted individuals related to their work on the Project. Each Contractor's Worker Code of Conduct must include the principles, guidance and requirements in the TMEP Worker Code of Conduct.</p> <p>Trans Mountain has developed a Socio-Economic Effects Monitoring Plan to monitor and respond to adverse socio-economic effects that may occur during construction, including those associated with workforce hosting and worker conduct.</p>	<p>NEB Condition 59 Worker Accommodation Strategy (Appendix E)</p> <p>NEB Condition 13 Socio-Economic Effects Monitoring Plan</p>

TABLE A-1 Cont'd

Issues or Concern	Summary Trans Mountain Response	Where Addressed
Community readiness regarding workforce hosting for community services	Trans Mountain is sharing its worker accommodation approach well in advance of construction to aid in community readiness. The draft worker accommodation strategy provided a basis for engagement with appropriate municipal and provincial authorities, communities and landowners/tenants, and to allow advancement of discussions about camp siting, permits and operational plans, as well as to facilitate business and use planning with local and regional accommodation and other service providers.	NEB Condition 59 Worker Accommodation Strategy.
The ability to staff local businesses to accommodate the needs of an influx of workers residing in the community when the unemployment rate in the community is zero.	Trans Mountain is sharing its worker accommodation approach well in advance of construction to aid in community readiness. The draft worker accommodation strategy provided a basis for engagement with appropriate municipal and provincial authorities, communities and landowners/tenants, and allowed advancement of discussions about camp siting, permits and operational plans, as well as to facilitate business and use planning with local and regional accommodation and other service providers. Trans Mountain recognizes the economic climate in many communities has changed since the Application has filed, particularly in Alberta and northern BC, which are facing an economic downturn.	NEB Condition 59 Worker Accommodation Strategy.
Jasper has an extreme shortage of service staff and there could be an additional strain on the food service industry.	Trans Mountain will communicate with municipalities well in advance of construction about updated anticipated construction workforce numbers and schedule so services can prepare for workforce hosting needs and opportunities. The size of the workforce associated with Project-related activities in Jasper National Park will be relatively small, as no new pipeline is being built. It is anticipated there will be on average about 30 non-local workers involved in reactivation and pump station work in this area over the construction period. TMEP has also developed a Socio-Economic Effects Monitoring Plan to monitor potentially adverse socio-economic effects of construction, including those associated with temporary workforce hosting.	NEB Condition 13 Socio-Economic Effects Monitoring Plan
Extra strain on grocery stores due to an influx of workers in the community and the availability of food for local residents.	Trans Mountain understands that the presence of temporary construction-phase workers in communities will increase demand for certain services and infrastructure. Trans Mountain will communicate with municipalities well in advance of construction about updated anticipated construction workforce numbers and schedule so services can prepare for workforce hosting needs and opportunities. The size of the workforce associated with Project-related activities in Jasper National Park will be relatively small, as no new pipeline is being built. It is anticipated there will be on average about 30 non-local workers involved in reactivation and pump station work in this area over the construction period. TMEP has also developed a Socio-Economic Effects Monitoring Plan to monitor potentially adverse socio-economic effects of construction, including those associated with temporary workforce hosting.	NEB Condition 13 Socio-Economic Effects Monitoring Plan
Both proposed camp locations are within the Valemount fire service protection area and will require both fire and building inspections. Building permit will be required from Regional District of Fraser Fort George (RDFFG).	The Contractor will work closely with the RDFFG on any permitting and service requirements related to the proposed camp in or near Valemount.	NEB Condition 59 Worker Accommodation Strategy (Section 4.3)
Sewer lagoon in Clearwater may need to be upgrade to handle an increase in volume due to an increase of workers in the community.	The Contractor will work closely with the District of Clearwater on any permitting and service requirements related to the Clearwater camp.	NEB Condition 59 Worker Accommodation Strategy (Section 4.3)

3.1.2 New Interests, Issues, Concerns and Response – July 2015 to June 2017

Table A-2 includes new interests, issues and concerns with respect to worker accommodation identified through public consultation and engagement activities between July 2015 and June 2017.

TABLE A-2

SUMMARY OF PUBLIC CONSULTATION – JULY 2015 TO JUNE 2017

Stakeholder Name	Method of Contact	Date of Consultation Activity	Issue or Concern	Trans Mountain Response	Where Addressed in the Plan
Hinton and District Chamber of Commerce	Email	June 17, 2016	Should Hinton expect hotel booking associated with temporary workers?	Yes, Hinton will be a construction hub community. Given the accommodation capacity, local commercial accommodation will be used by workers. Contractors will conduct additional investigations with local chambers of commerce, hoteliers and RV park managers to identify interested suppliers. The Contractors will prepare guidance and specifications for workers with respect to which accommodation venues may be utilized.	Section 3.0
Tourism Kamloops	Meeting	December 15, 2016	The potential impact to Municipal and Regional District Tax (MRDT) funding if workers exceed the 28-day limit in local accommodations. MRDT funding supports the Tourism Kamloops activities.	As construction planning progresses, General Construction Contractors will conduct additional investigations with local chambers of commerce, hoteliers, RV park managers with the aim of identified interested suppliers and pre-establishing corporate use agreements for Project workers. Contractors will prepare guidance and specifications for workers with respect to which accommodation venues may be utilized.	Section 3.0
			Workers staying in provincial campgrounds and blocking up campsites for tourists.	As construction planning progresses, Contractors will conduct additional investigations with local chambers of commerce, hoteliers, RV park managers with the aim of identified interested suppliers and pre-establishing corporate use agreements for Project workers. Contractors will prepare guidance and specifications for workers with respect to which accommodation venues may be utilized.	Section 3.0
Accommodation or lodging suppliers (various)	Various	Various	Interested in providing accommodation/lodging services to Project workers during construction	Trans Mountain will have a mixed approach to accommodation, which considers the various capacities of the communities along the Project route. The Project will use camps in some communities (i.e., Valemount, Blue River, Clearwater, Merritt and Hope), as well as available commercial accommodation in communities. Contractors will conduct additional investigations with local chambers of commerce, hoteliers and RV park managers to identify interested suppliers. The Contractors will prepare guidance and specifications for workers with respect to which accommodation venues may be utilized. All interested suppliers are encouraged to register in Trans Mountain's procurement database, which will be provided to Contractors.	Section 3.0

3.2 Appropriate Government Authority Consultation

3.2.1 Appropriate Government Authority Consultation Summary – May 2012 to June 2015

A summary of issues related to worker accommodation from engagement with Appropriate Government Authorities is provided in Table A-3.

TABLE A-3

**SUMMARY OF CONSULTATION WITH APPROPRIATE GOVERNMENT AUTHORITIES -
MAY 2012 TO JUNE 2015**

Stakeholder Issue/Concern	Municipal or Provincial Authority	Trans Mountain's Response	Where Addressed in the Strategy
Discourages camps, particularly within municipal limits; would prefer workers use local accommodations. Local businesses/hotels/motels would want the business. Economic opportunity is desired.	Town of Stoney Plain Town of Edson Town of Hinton Parkland County City of Kamloops City of Merritt District of Clearwater City of Surrey District of Hope Thompson Nicola Regional District	Camps are not proposed in the Town of Edson, Town of Hinton, City of Kamloops or City of Surrey. Given the accommodation capacity, local commercial accommodation will be used by workers. Contractors will conduct additional investigations with local chambers of commerce, hoteliers and RV park managers to identify interested suppliers. The Contractors will prepare guidance and specifications for workers with respect to which accommodation venues may be utilized. A camp is proposed in Merritt, Clearwater and Hope to offset some the Project-related demand, but it is anticipated that some workers will use commercial accommodation at peak times.	Section 3.0
Provision of fire services for camp.	Village of Valemount District of Clearwater City of Merritt	Contractors will continue to engage with municipal and regional authorities regarding camp operational details, including emergency response protocols.	Section 4.2 Operational Requirements
Interest in camp development partnership – provision of land, development of infrastructure.	Village of Valemount Village of Wabamun	Trans Mountain and its Contractors are engaging with the Village of Valemount and RDFFG on camp siting, and the Contractor will continue to work with authorities regarding permitting and service requirements related to the Valemount camp. No camp is proposed in or around the Village of Wabamun.	Section 3.0
Identification of specific location of camp within community/region.	City of Kamloops Village of Valemount District of Clearwater	Specific locations for the five camps are presented in Table 3. Trans Mountain and its Contractors will continue to engage with municipal and regional authorities regarding camp siting and operational details in Valemount and Clearwater. No camp is proposed in the Kamloops area.	Table 3 – Location of Camps; Section 4.3 Camp Permits
Potential community benefits associated with camp development.	Village of Wabamun Town of Hinton	Camps are not being proposed in the Wabamun area or in Hinton. However, non-camp hub communities will experience economic benefits associated with spending by temporary workers on commercial accommodation, meals and incidentals.	Non Hub community benefits not specifically addressed in Strategy
Negative social impacts of workforce hosting.	Village of Valemount City of Kamloops District of Clearwater City of Merritt Vancouver Coastal Health Authority	Trans Mountain has developed a Worker Code of Conduct regarding the appropriate behaviour of all Project workers. Trans Mountain is also proposing temporary camps in select locations to offset Project-related demand for accommodation (see Section 3.0 and Appendix E). Trans Mountain has developed a Socio-Economic Effects Monitoring Plan (NEB Condition 13) to monitor and respond to adverse socio-economic effects that may occur during construction, including those associated with workforce hosting and worker conduct.	Appendix E– Worker Code of Conduct. Use of temporary camps Section 3.0. See also NEB Condition 13 Socio-Economic Effects Monitoring Plan
Camp permitting.	BC Oil and Gas Commission Regional District of Fraser Fort George Village of Valemount	Contractors will continue to work closely with municipal and provincial authorities on camp permitting requirements. The WAS includes copies of principal authorizations in place and a schedule of outstanding authorizations required to commence camp site activity, as well as a list of other potential permits related to camp structures and operations.	Section 4.3 Camp Permits; also Appendix B
Camp traffic management – types of vehicles, traffic volume and marshaling procedures. Accident reporting.	BC Ministry of Transportation and Infrastructure Burnaby Board of Trade District of Clearwater Village of Valemount City of Kamloops City of Merritt Town of Edson Town of Jasper	Traffic management is addressed in NEB Condition 73 Traffic and Access Control Management Plan, which will present information on current and anticipated traffic volumes, predicted traffic flows at key Project locations, and an assessment of potential impacts of construction-related traffic and proposed mitigation. As part of the Socio-Economic Effects Monitoring Plan (NEB Condition 13), during construction, Trans Mountain will monitor motor vehicle collisions or reportable incidents that involve Project vehicles on public roads during work hours or Contractor-owned vehicles during off work hours	Not specifically addressed in WAS. See NEB Condition 73 Traffic and Access Control Management Plan See also NEB Condition 13 Socio-Economic Effects Monitoring Plan

TABLE A-3 Cont'd

Stakeholder Issue/Concern	Municipal or Provincial Authority	Trans Mountain's Response	Where Addressed in the Strategy
Community accommodation availability and seasonal variations, including impact of decreased accommodation availability on tourism.	District of Clearwater Town of Edson Village of Valemount City of Kamloops Fraser Valley Regional District Chilliwack Chamber of Commerce City of Abbotsford	Trans Mountain's approach to worker accommodation considers the accommodation capacities of the various communities along the Project route. Temporary camps will be used in select locations to offset Project-related demand on local accommodations. Camps will be used in Valemount, Blue River, Clearwater, Merritt and Hope. The Contractors will also work with municipal authorities regarding unique accommodation arrangements during anticipated community events. Trans Mountain has developed a Socio-Economic Effects Monitoring Plan (NEB Condition 13) to monitor and respond to adverse socio-economic effects that may occur during construction, including those associated with workforce hosting.	Use of temporary camps and consideration of community events discussed in Section 3.0. See also NEB Condition 13 Socio-Economic Effects Monitoring Plan
Worker code of conduct.	Village of Valemount District of Clearwater City of Merritt City of Kamloops Vancouver Coastal Health Authority	Trans Mountain's Worker Code of Conduct is in Appendix E.	Appendix E
Workforce loading and camp development timing.	City of Kamloops Village of Valemount District of Clearwater City of Merritt Thompson Nicola Regional District	Current estimates of workforce loading (month-to-month over construction) are presented in Section 3.0 of this Strategy. Contractors will continue to work closely with municipal and provincial authorities on camp permitting requirements and development timing. Camps are not needed in the early stages of construction as early activity crews are relatively small; camps are anticipated to be in service starting in Q1 2018 (Valemount and Blue River camps) and Q2 2018 (Clearwater, Hope camps) and Q3 2018 Merritt.	Section 3.0 and Section 4.3
Camp procurement and employment opportunities.	Village of Valemount District of Clearwater City of Merritt	Trans Mountain and its Contractors will continue to engage with municipal and regional authorities regarding camp operational details. More about camp procurement opportunities and needs will emerge during this timeframe. Interested suppliers are encouraged to provide their information to the TMEP on-line procurement database.	Section 4.2
Impact of workers on restaurants and meal availability; interruption to existing business.	Fraser Valley Regional District	The presence of temporary workers residing in construction communities is anticipated to result in increased local business opportunities related to worker spending on accommodation, meals and incidentals. Trans Mountain understands that the presence of temporary construction-phase workers in communities will increase demand for certain services and infrastructure. Trans Mountain and its Contractors are communicating with municipalities well in advance of construction about updated anticipated construction workforce numbers and schedule so services can prepare for workforce hosting needs and opportunities. Trans Mountain understands there may be effects related to demand pressures on certain services. Feedback related to experienced social effects during construction will be monitored through the Socio-Economic Effects Monitoring Plan (NEB Condition 13).	Feedback related to experienced social effects during construction will be monitored through the Socio-Economic Effects Monitoring Plan (NEB Condition 13).
Impact of decreased hotel availability on neighbouring communities (ripple effect).	Fraser Valley Regional District	Feedback related to experienced social effects during construction will be monitored through the Socio-Economic Effects Monitoring Plan (NEB Condition 13). In particular, Trans Mountain will seek qualitative feedback about Project use of local/regional commercial accommodation (e.g., hotels, motels, campgrounds).	Use of temporary camps to offset hotel demand – Section 3.0. See also NEB Condition 13 Socio-Economic Effects Monitoring Plan
Local regulations for work camps.	Vancouver Coastal Health Authority	Work camps will meet all the requirements of applicable laws and regulations.	Section 4.2 Operational Requirements

TABLE A-3 Cont'd

Stakeholder Issue/Concern	Municipal or Provincial Authority	Trans Mountain's Response	Where Addressed in the Strategy
Concerns about camp security and need for TMEP to provide own services.	Town of Stony Plain City of Merritt Village of Valemount District of Clearwater Town of Jasper	Camp suppliers will be responsible for ensuring that camp security is provided, including uniformed security personnel.	Section 4.2 Operational Requirements
Impact of hotel use on vulnerable populations (current use; affordability).	Town of Stony Plain City of Kamloops	Feedback related to experienced social effects during construction will be monitored through the Socio-Economic Effects Monitoring Plan (NEB Condition 13). In particular, Trans Mountain will seek qualitative feedback about Project use of local/regional commercial accommodation (e.g., hotels, motels, campgrounds).	Not specifically addressed in WAS. See also NEB Condition 13 Socio-Economic Effects Monitoring Plan
Concurrent effects with other major projects and worker accommodation.	Town of Stony Plain City of Kamloops District of Clearwater	Feedback related to experienced social effects during construction will be monitored through the Socio-Economic Effects Monitoring Plan (NEB Condition 13). In particular, Trans Mountain will seek qualitative feedback about Project use of local/regional commercial accommodation (e.g., hotels, motels, campgrounds).	Not specifically addressed in WAS. See also NEB Condition 13 Socio-Economic Effects Monitoring Plan
Support for worker use of community facilities and recreation – and volunteering.	Town of Edson Town of Jasper Village of Valemount	Community-specific preferences with regard to use of community recreation and other facilities will be incorporated into the mandatory worker orientation program, as noted in Worker Code of Conduct. As noted in the Worker Code of Conduct, Trans Mountain will encourage worker volunteering in the community, recognizing it is a personal choice to do so.	Appendix E – Worker Code of Conduct
Interest in receiving input from workers on community perceptions.	Town of Edson Village of Valemount	Trans Mountain will ensure that any feedback received from its workers regarding the host community is fed back to municipal leaders.	Not specifically addressed in the WAS
Income disparity between workers and residents.	Municipality of Jasper	Trans Mountain understands that the presence of temporary workers in communities may contribute to short-term income differentials, particularly in smaller communities. However, the size of the workforce associated with Project-related activities in Jasper National Park will be relatively small, as no new pipeline is being built. As such, it is not anticipated that Project construction work force will contribute to any sustained pattern of income disparity in Jasper at a community level. TMEP has also developed a Socio-Economic Effects Monitoring Plan (NEB Condition 13) to monitor potentially adverse socio-economic effects of construction, including those associated with temporary workforce hosting. If any unforeseen community issues arise in relation to the Project through monitoring, Trans Mountain will work to address them to the extent possible in collaboration with key community stakeholders.	Section 3.5 See also NEB Condition 13 Socio-Economic Effects Monitoring Plan
Tourism perception of workers in resort town (negative impact on tourism).	Municipality of Jasper	The size of the workforce associated with Project-related activities in Jasper National Park will be relatively small, as no new pipeline is being built. All workers will be required to follow the TMEP Worker Code of Conduct (see Appendix E). TMEP has also established a Socio-Economic Effects Monitoring Plan (NEB Condition 13) to monitor potentially adverse socio-economic effects of construction, including those associated with temporary workforce hosting.	Section 3.5 Appendix E See also NEB Condition 13 Socio-Economic Effects Monitoring Plan

3.2.2 Appropriate Government Authority Consultation Summary – May 2012 to June 2017

A summary of consultation feedback from Appropriate Government Authorities related to worker accommodation between July 2015 and June 2017, including that related to the draft WAS, is presented in Table A-4.

TABLE A-4

**SUMMARY OF APPROPRIATE GOVERNMENT AUTHORITY CONSULTATION ACTIVITIES
 RELATED TO WORKER ACCOMMODATION - JULY 2015 TO JUNE 2017**

Stakeholder Group/ Agency Name	Method of Contact	Date of Consultation Activity	Feedback/Stakeholder Response	Trans Mountain Response	Where Addressed in the Plan
RDFFG	Email	July 6, 2015	Management of solid waste from camp. Concern about capacity of Valemount Solid Waste Transfer Station.	Trans Mountain will require Contractors to develop detailed waste management plans for each camp, in consultation with Appropriate Government Authorities and in consideration of a location specific assessment of community facility capacities in light of anticipated Project needs. Trans Mountain will continue to collaborate with the local government authority in host communities regarding final options for camp waste/septic disposal.	Section 4.2
BC Ministry of Children and Family Development	Email	July 13, 2015	Influx of workers with respect to construction camps	The number of workers anticipated in various locations along the Project is provided in Section 3.0. The TMEP Worker Code of Conduct outlines expectations and requirements regarding worker conduct for all people engaged in work activity during construction of the Project (see Appendix E). TMEP has also established a Socio-Economic Effects Monitoring Plan (NEB Condition 13) to monitor potentially adverse socio-economic effects of construction, including those associated with temporary workforce hosting.	Section 3.0 and Appendix E See also Socio-Economic Effects Monitoring Plan (NEB Condition 13)
Fraser Valley municipalities and services representatives	Meeting	July 14, 2015	Pressure on hotel occupancy rates and eating establishments for community events during construction (for example, Abbotsford Airshow)	Trans Mountain's accommodation approach considers the accommodation capacities of the various communities along the Project route. A camp will be used in Hope to offset demands on local accommodations. As construction planning progresses, Contractors will conduct additional investigations with local chambers of commerce, hoteliers, RV park managers with the aim of identified interested suppliers and Contractors will prepare guidance and specifications for workers with respect to which accommodation venues may be utilized. Contractors will also work with municipal authorities regarding unique accommodation arrangements during anticipated community events.	Section 3.0, Section 3.9 and Section 3.10

TABLE A-4 Cont'd

Stakeholder Group/ Agency Name	Method of Contact	Date of Consultation Activity	Feedback/Stakeholder Response	Trans Mountain Response	Where Addressed in the Plan
Metro Vancouver municipality and services representatives	Meeting	July 15, 2015	Concern about worker behaviour and "wild west" attitude of workers.	Trans Mountain has developed a TMEP Worker Code of Conduct, which is attached in Appendix E. The TMEP Worker Code of Conduct outlines expectations and requirements regarding worker conduct for all people engaged in work activity during construction of the Project, including Trans Mountain direct employees and employees and subcontractors of companies contracted by Trans Mountain. This document applies to workers staying in temporary camps. The Worker Code of Conduct outlines expectations with respect to compliance with the law; health, safety and environment; drug and alcohol use; possession of weapons; respectful behaviour; after-hours conduct, etc.	Section 4.4 and Appendix E.
Village of Valemount RDEFG	Technical Working Group Meeting	July 16, 2015	<p>The camps and construction crews will need to develop solid waste management plans that align with the RDEFG capacity. The size of the workforce compared to the Anchor Loop project.</p> <p>Ensure that TMEP consults with the Valemount fire department when camp sites and details have been determined. Fire and building inspections will be required.</p> <p>Location of camp. The old airport may not be large enough for a camp. TMEP needs to consult with the regional district with regards to permitting for camps.</p>	<p>Trans Mountain will develop waste management plans for each camp, in consultation with Appropriate Government Authorities and in consideration of a location specific assessment of community facility capacities in light of anticipated Project needs. Trans Mountain will continue to collaborate with the local government authority in host communities regarding final options for camp waste/septic disposal.</p> <p>Trans Mountain and its Contractors will also continue to engage with municipal and regional authorities during Q2 to Q4 2017 regarding siting, as well as camp operational details, including emergency response protocols, health and medical services requirements and protocols and municipal or regional camp permit requirements. Revised workforce estimates by spread/region are provided in Section 3.0 of the Worker Accommodation Strategy.</p> <p>The final location of the Valemount camp is shown in Figure 6, Section 3.6.</p>	Section 3.6 and Section 4.2 and 4.3
District of Clearwater	Email	Oct. 7, 2016	Location of camp in Clearwater or Vavenby area.	A camp will be located in the Clearwater area; the final site is shown in Figure 8, (Clearwater Camp 2 Road).	Section 3.6 and Section 4.3
Northern Health Authority	Email	December 12, 2016	Northern health submitted their Draft Infection Control Best Management Guide for Industrial Camps as a guideline for camp accommodation.	<p>Trans Mountain appreciates this guidance. Trans Mountain will ensure camp operators develop a Health and Medical Services Plan for construction camps which will address communicable disease control protocols, including isolation, transport and notification.</p> <p>Trans Mountain has provided this guideline to the construction team that will be working in the jurisdiction of Northern Health (i.e., Valemount area).</p>	<p>Section 4.2.</p> <p>See also the BC EAO Worker Accommodation Strategy (BC EAO Condition 23), Section 6.0</p>

TABLE A-4 Cont'd

Stakeholder Group/ Agency Name	Method of Contact	Date of Consultation Activity	Feedback/Stakeholder Response	Trans Mountain Response	Where Addressed in the Plan
RDFFG	Email	December 16, 2016	Stakeholder provided permitting and construction planning information in response to invitation to review environmental plans. Information was forwarded to Project director and will be included in the Technical Working Group meeting in Q1 2017.	Trans Mountain and its Contractors will continue to engage with municipal and regional authorities regarding camp operational details, including waste management plans, emergency response protocols, health and medical services protocols and municipal or regional camp permit requirements	Section 4.1
Tony Hamilton, Large Carnivore Specialist, MoE	Webinar, Email, Telephone	February - March 2017	Is there precedence for the use of sleeper camps in Western Canada?	Trans Mountain has heard the concern expressed by some host communities about the lack of adequate dining/recreation capacity to host sleeper camps and other issues and has further evaluated the capacity of camp communities. In response to stakeholder feedback and capacity evaluations, and to ensure the operational needs of the Project and its workforce are met, Trans Mountain will build and utilize full service camps in all five camp locations.	Section 3.1
			Concerned about food, and availability of attractants for wildlife. People in sleeper camps still might have mini fridges, lunches, snacks after hours, regardless on no food allowed. This really questions whether sleeper camps can be attractant free for wildlife. Need to link Grizzly Bear Plan with respect to camps, for standards if electrification needed, at the Blue River site? Another catch 22 is in the code of conduct for bear interaction, promoting pepper spray for workers but it is a weapon. There is also another catch in the code of conduct for hunting and fishing, storage of weapons in TMEP camps and restrictions on hunting and fishing on the ROW, but there is a need for Aboriginal allowance to hunt and fish vs everyone associated. Concern that specifying no hunting/fishing in right-of-way invites workers to hunt and fish elsewhere. Should be discouraging hunting and fishing.	Trans Mountain will use full service camps in all five camp locations. Issues around grizzly bear management are addressed in BC EAO Conditions 18 and 19. Bear spray is permitted provided workers are trained in the storage, use and handling of the product including a review of Material Safety Data Sheets (Safety Data Sheets). Air horns are a preferred method of wildlife deterrence. Allowance for Aboriginal hunting and fishing within their traditional territory is specified in the Worker Code of Conduct. TMEP Worker Code of Conduct specifies that worker use and enjoyment of the environment when off-duty must be done in full compliance with all laws and regulations. Requirements regarding storage of hunting and fishing gear outlined in the Worker Code of Conduct will limit activity to a degree.	Section 3.0 See Appendix E

TABLE A-4 Cont'd

Stakeholder Group/ Agency Name	Method of Contact	Date of Consultation Activity	Feedback/Stakeholder Response	Trans Mountain Response	Where Addressed in the Plan
Ann Godon, Section Head, BC MoE LNG Team	Webinar	February 16, 2017	<p>Have you reviewed Ministry's industrial camp fact sheet? We've had this fact sheet over 2 years.</p> <p>The fact sheet deals with all sorts of waste from work camps. A campsite of over 100 people will need to consider registration under the municipal waste water regulation under the Environmental Management Act and administered through MoE as well. Error on page 21- with a permit needs on regional health authority- this incorrect; you will need to register under the municipal waste water regulation. This is a structured application process that takes time to put together and takes time for ministry to review it. If permit requirements for TMEP is in Q1/Q2, but conversations with Ministry have not started yet by TMEP, it is a serious concern. It was stated that TMEP was going to burn combustible garbage, but the Ministry views burning as the last resort for camps in remote location. Burning also requires an Air Permit under the Environmental Management Act as well, and that also needs time for a review. With regards to camp solid waste, what capacities are there available, are there discussions with the different districts?</p>	<p>At the time of the webinar, technical discussions about permitting and operational details of camps were not advanced, as Trans Mountain was in site selection process for camps. Details will be in the specific permit applications. Trans Mountain thanks MoE for forwarding the Industrial Camps Fact Sheet. Trans Mountain will develop waste management plans for each camp, in consultation with Appropriate Government Authorities and in consideration of a location specific assessment of community facility capacities in light of anticipated Project needs, which will be .filed with the NEB.</p> <p>A listing of anticipated camp permits related to camp operations is provided in Appendix B.</p>	Section 4.2 and Appendix B.
T. Thomson, MoE	Email	April 28, 2017	<p>Specific plans for addressing liquid waste generated by the proposed work camps should be prepared and presented for assessment. Proposed camps have a capacity of 350-500 workers and if on-site sewage treatment and disposal is under consideration, camps of this size will require registration under the Municipal Wastewater Regulation (MWR). Relevant requirements under the registration can then be referenced by the Health and Safety Management Plan (HSMP, EAO Condition 23, Section 6.0) for each camp as applicable.</p>	<p>Details will be in the specific permit applications, which will be applied for by the Contractors. Trans Mountain will require Contractors to develop detailed waste management plans for each camp, in consultation with Appropriate Government Authorities and in consideration of a location specific assessment of community facility capacities in light of anticipated Project needs.</p> <p>A listing of anticipated required camp permits related to camp operations is provided in Appendix B of the Strategy.</p>	Section 4.2 and Appendix B.

TABLE A-4 Cont'd

Stakeholder Group/ Agency Name	Method of Contact	Date of Consultation Activity	Feedback/Stakeholder Response	Trans Mountain Response	Where Addressed in the Plan
T. Thomson, MoE	Email	April 28, 2017	(NEB Condition 59) Mitigation, Operational Requirements, solid waste The location of the camps appears to be relatively close to populated areas and is not considered remote. Also, all proposed camps exceed 100 persons. As a result, solid waste disposal by means of incineration would require authorization under the Environmental Management Act in the form of an air discharge permit. Please note that MoE strongly discourages incineration as a waste disposal option for non-remote camps. In any case, some types of solid wastes cannot be incinerated and disposal by deposit in an authorized landfill is required. This option should be investigated including discussions with Regional District landfill operators. The resulting information on this disposal option should be included in the plan. For further information on waste disposal resulting from temporary work camps, please refer to the Industrial Camps Fact Sheet located here: http://www2.gov.bc.ca/assets/gov/environment/waste-management/sewage/mwr/workcampsfs.pdf	Appendix B of the Strategy lists the permits related to camp operations, including the need for a Waste Discharge Permit (Air Emissions - Waste Incineration Camp over 100 persons). Contractors will continue to engage with municipal and provincial authorities on camp operations permit requirements. Details will be provided in specific permit applications, as opposed to the Strategy.	Section 4.2 and Appendix B
District of Clearwater	Technical Working Group	January 16, 2017	All District residents are on septic. Camp will require hauling. Solid waste site is at over-capacity but grant application is underway to increase hours/capacity (opportunity for KMC to support additional hours). Summer tourism peak creates pressure on septic capacity in North Thompson Valley.	Trans Mountain will develop waste management plans for each camp, in consultation with Appropriate Government Authorities and in consideration of a location specific assessment of community facility capacities in light of anticipated Project needs. Trans Mountain will continue to collaborate with the local government authority in host communities regarding final options for camp waste/septic disposal.	Section 4.2
Thompson Nicola Regional District (TNRD)	Technical Working Group	January 17, 2017	Septic and sewer capacity is limited in the North Thompson Valley. There are 11 small water systems. The TNRD is interested in required utilities and if the camp will require support. Temporary camp permits are not required in TNRD if larger than 4 acres and not in residential areas.	Trans Mountain will develop waste management plans for each camp, in consultation with Appropriate Government Authorities and in consideration of a location specific assessment of community facility capacities in light of anticipated Project needs. Trans Mountain will continue to collaborate with the local government authority in host communities regarding final options for camp waste/septic disposal.	Section 4.2
Village of Valemount	Public Information Session	February 7, 2017	Attendees expressed interest in knowing camp location.	Potential camp locations were shared in the various draft Conditions made public for review and comment in mid-February 2017 or thereafter. Trans Mountain confirms the Valemount camp will be location near the south boundary of the Village at PID 012-173-908 and PID 015-200-906 (see Figure 6 in the Strategy).	Section 3.6
Community of Blue River	Public Information Session	February 8, 2017	Option A camp site in Blue River was proposed by local government representative as a preferred site.	Blue River Option A site is the final site selected for the Blue River Camp, which incorporates this feedback (see Figure 7).	Section 3.6

TABLE A-4 Cont'd

Stakeholder Group/ Agency Name	Method of Contact	Date of Consultation Activity	Feedback/Stakeholder Response	Trans Mountain Response	Where Addressed in the Plan
District of Clearwater	Public Information Session	February 9, 2017	Local government representative requested consideration of Camp 2 Road site for Clearwater Camp as preferred option.	Clearwater Camp 2 Road is the final camp site for Clearwater, which incorporates this feedback (see Figure 8)	Section 3.6
RDFFG	Technical Working Group	February 17, 2017	Camp location may require permitting - can be 3-month process and includes public consultation requirements. Concerns about solid waste management - landfill is at capacity. May need to truck waste to Prince George. Sewer system is operated by Valemount. Unsure about capacity.	<p>Trans Mountain confirms the Valemount camp will be located in the south end of the Village on PID # 012-173-908 and PID # 015-200-906 (see Figure 6 in the Strategy).</p> <p>Trans Mountain will develop waste management plans for each camp, in consultation with Appropriate Government Authorities and in consideration of a location specific assessment of community facility capacities in light of anticipated Project needs. Trans Mountain will continue to collaborate with the local government authority in host communities regarding final options for camp waste/septic disposal.</p> <p>Trans Mountain and its Contractors will continue to engage with Appropriate Government Authorities regarding camp permitting and operational requirements.</p>	Section 3.6 Section 4.2
District of Clearwater	Meeting	April 11, 2017	The District expressed concerns about the community's ability to support a sleeper camp - does not think there are enough food services available. Latent capacity does exist but still not enough to provide food services for peak workforce. Full camp model is preferred - lots of economic development opportunities related to camp spillover and management. District prefers Camp 2 Road camp location - water could be extended to that location and there is power to the site.	<p>Trans Mountain has heard the concern expressed by some host communities about the lack of adequate dining/recreation capacity to host sleeper camps and has further evaluated the capacity of camp communities. In response to stakeholder feedback and capacity evaluations, and to ensure the operational needs of the Project and its workforce are met, Trans Mountain will build and utilize full service camps in all five camp locations.</p> <p>Clearwater Camp 2 Road location for camp is Trans Mountain's site for the Clearwater camp. Trans Mountain and its Contractors will continue to engage with Appropriate Government Authorities regarding camp permitting and operational requirements.</p> <p>Trans Mountain will develop waste management plans for each camp, in consultation with Appropriate Government Authorities and in consideration of a location specific assessment of community facility capacities in light of anticipated Project needs.</p>	Section 3.0 Section 4.2

TABLE A-4 Cont'd

Stakeholder Group/ Agency Name	Method of Contact	Date of Consultation Activity	Feedback/Stakeholder Response	Trans Mountain Response	Where Addressed in the Plan
TNRD Area Services Administrator	Meeting	April 11, 2017	Supports Blue River Option A proposed camp location. Long term plans for site are for a parking lot or park/disk golf locations. Prefer to keep a buffer of trees along the river and preserve local fishing spots. Septic would have to be hauled; no water at site, solid waste would need to be hauled to transfer station.	Blue River Option A site is the final site selected for the Blue River Camp, which incorporates this feedback. Trans Mountain will develop waste management plans for each camp, in consultation with Appropriate Government Authorities and in consideration of a location specific assessment of community facility capacities in light of anticipated Project needs. Trans Mountain will continue to collaborate with the local government authority in host communities regarding final options for camp waste/septic disposal.	Section 3.6 Section 4.2
TNRD	Meeting	April 13, 2017	Blue River Option A Camp: TNRD has a license of occupation but does not own the land. No concerns about location. Zoned P1 which allows construction camps. The site includes a pump station and 2 weeks for Blue River residents. Water system is now at peak capacity. Will require a setback from the river for the riparian zone. No TNRD power to location. Solid waste will need to be trucked to Clearwater. TNRD is interested in partnering with KMC on purchase of solid waste compactor - leave as a community legacy. Septic will need to be trucked to Kamloops, waste can be hauled to Hefley Creek landfill (Valemount as well). Clearwater Option A Camp: some Agricultural Land Reserve parcels in the general location. Municipal road ends at corner before the camp. Solid waste capacity is good. Septic would be hauled to Kamloops. Power is available. One-way road to camp could be reverted back to two-way travel if required (would require widening). TNRD wants to ensure Trans Mountain has emergency evacuation plans for workers so they would not be a TNRD responsibility.	Blue River Option A camp is the final camp site selected for Blue River, which incorporates this feedback. Clearwater Camp 2 Road is the preferred final camp site for Clearwater, which incorporates this feedback. Trans Mountain has heard the concern expressed by some host communities about the lack of adequate dining/recreation capacity to host sleeper camps and has further evaluated the capacity of camp communities. In response to stakeholder feedback and capacity evaluations, and to ensure the operational needs of the Project and its workforce are met, Trans Mountain will build and utilize full service camps in all five camp locations. Trans Mountain will develop waste management plans for each camp, in consultation with Appropriate Government Authorities and in consideration of a location specific assessment of community facility capacities in light of anticipated Project needs. Trans Mountain will continue to collaborate with the local government authority in host communities regarding final options for camp waste/septic disposal.	Section 3.6 Section 4.2

TABLE A-4 Cont'd

Stakeholder Group/ Agency Name	Method of Contact	Date of Consultation Activity	Feedback/Stakeholder Response	Trans Mountain Response	Where Addressed in the Plan
City of Merritt	Meeting	May 3, 2017	<p>No concerns expressed regarding proposed camp locations. The City suggested the festival grounds as another potential option for a camp and inquired about how sewage would be dealt with. With regards to permitting, the current proposed camp locations are outside of the City limits and don't require city permits. The City indicated that there were no options to feed a maximum workforce breakfast or lunch in town.</p>	<p>Trans Mountain looked at the Merritt festival grounds as another potential option for the Merritt camp, but the site had limiting factors (e.g., distance, access and it would require notable levelling and then remediation) in comparison to the other options.</p> <p>Trans Mountain will develop waste management plans for each camp, in consultation with Appropriate Government Authorities and in consideration of a location specific assessment of community facility capacities in light of anticipated Project needs. Trans Mountain will continue to collaborate with the local government authority in host communities regarding final options for camp waste/septic disposal.</p> <p>Given no concerns regarding the proposed camp locations, the Merritt Camp, Office/Yard and Stockpile Site – Chutter Ranch is the final site selected for the Merritt camp.</p> <p>Trans Mountain has heard the concern expressed by some host communities about the lack of adequate dining/recreation capacity to host sleeper camps and has further evaluated the capacity of camp communities. In response to stakeholder feedback and capacity evaluations, and to ensure the operational needs of the Project and its workforce are met, Trans Mountain will build and utilize full service camps in all five camp locations.</p> <p>Trans Mountain and its Contractors will continue to engage with Appropriate Government Authorities regarding camp permitting and operational requirements.</p>	Section 3.8 Section 4.2
District of Hope	Meeting	May 16, 2017	<p>Potential camp locations were discussed. District indicated preference for the camp to be located on Flood Hope Road near the airport.</p>	<p>Trans Mountain's final site for the Hope camp is Hope Stockpile and Camp 6 St. Elmo Road as an agreement with the owner of the Flood Hope Road site could not be reached and thus the site is not available to Trans Mountain.</p> <p>Based on subsequent community feedback, the St. Elmo Road site for the Hope area camp is no longer being considered. Trans Mountain is working with the Cheam First Nation on a new final proposed site west of Hope.</p>	Section 3.9

TABLE A-4 Cont'd

Stakeholder Group/ Agency Name	Method of Contact	Date of Consultation Activity	Feedback/Stakeholder Response	Trans Mountain Response	Where Addressed in the Plan
Fraser Valley Regional District / District of Hope	Meeting	May 17, 2017	No concerns expressed regarding waste management. How will organic waste be separated and managed on-site?	Trans Mountain will develop waste management plans for each camp, in consultation with Appropriate Government Authorities and in consideration of a location specific assessment of community facility capacities in light of anticipated Project needs. Trans Mountain will continue to collaborate with the local government authority in host communities regarding final options for camp waste/septic disposal.	Section 4.2
District of Clearwater	Meeting	June 3, 2017	Operating hours for sewer lagoon in Clearwater may need to be upgraded to handle an increase in volume due to increase of workers in the community.	Trans Mountain will develop waste management plans for each camp, in consultation with Appropriate Government Authorities and in consideration of a location specific assessment of community facility capacities in light of anticipated Project needs. Trans Mountain will continue to collaborate with the local government authority in host communities regarding final options for camp waste/septic disposal.	Section 4.2
TNRD	In person	June 28, 2017	In the context of a broader meeting, TNRD staff provided information on zoning, permitting requirements as well as waste, septic, water and utility capacity at the proposed camp locations in Clearwater. Camp is a permitted use under zoning for both sites considered in Clearwater; no camp permit is required. Building permit will be required for structure (non-farm use).	Trans Mountain will consider this information in assessing potential camp locations. The Camp 2 Road camp site (CLE011) is the final site location for the Clearwater camp. Contractors will continue to engage with Appropriate Government Authorities regarding camp operational details, including waste management plans and permit requirements.	Section 3.6

3.2.3 Appropriate Government Authority Consultation Summary – June to August 2017

Consultation with Appropriate Government Authorities regarding temporary camps and worker accommodation is ongoing. Updates to the consultation record outlining issues/concerns identified and Trans Mountain’s response are provided in Table A-5

TABLE A-5

SUMMARY OF APPROPRIATE GOVERNMENT AUTHORITY CONSULTATION ACTIVITIES RELATED TO WORKER ACCOMMODATION - JULY TO AUGUST 2017

Stakeholder Group/ Agency Name	Method of Contact	Date of Consultation Activity	Feedback/Stakeholder Response	Trans Mountain Response	Where Addressed in the Plan
Local residents in proximity to St. Elmo Road proposed camp location (Hope)	Letter	July 5, 2017	Residents expressed concerns about use of agricultural lands, traffic and road impacts as well as impacts to quality of life related to the St. Elmo Road proposed camp location.	See response letter sent August 10, 2017 (entry below), which confirmed Trans Mountain was no longer considering the St. Elmo Road site as a camp location.	Section 3.9, where a different camp location is presented.

TABLE A-5 Cont'd

Stakeholder Group/ Agency Name	Method of Contact	Date of Consultation Activity	Feedback/Stakeholder Response	Trans Mountain Response	Where Addressed in the Plan
MLA Throness Fraser Valley Regional District (FVRD) Area D Director Dickie FVRD Area B Director Adamson FVRD Staff	In-person	July 6, 2017	FVRD expressed concerns regarding the proposed St. Elmo camp location for worker accommodation in Hope. Concern: <ul style="list-style-type: none"> • Traffic impacts • Dust • The land is agricultural and there is concern regarding reclamation and impacts to the farmer who usually leases the land for agriculture use. An alternative location within the FVRD was proposed by FVRD Director Adamson.	Based on the feedback received from stakeholders, Trans Mountain is no longer considering the St. Elmo Road site as a camp location. Trans Mountain reviewed the suggested location internally to assess against camp criteria. This site was not appropriate for camp development as it is truncated by the pipeline right-of-way.	Section 3.9, where a different camp location is presented.
FVRD M. Thornton Director of Planning and Development	Email – in-coming	July 7, 2017	M. Thornton emailed Team Member to provide information on the property recommended by Director Adamson for the proposed 350 worker accommodation camp and material storage area (Alternate to St. Elmo Road site). M. Thornton requested confirmation of the intended site and its use (camp and/or stockpile) in order for M. Thornton to confirm the permit applications required.	Trans Mountain reviewed the suggested location internally to assess against camp criteria. This site was not appropriate for camp development as it is truncated by the pipeline right-of-way.	N/A
Chief Administrative Officer (CAO), District of Hope	In person	July 27, 2017	Team member met with stakeholder to provide an update regarding potential Hope camp location indicating St. Elmo Road was under consideration as the landowner arrangement for Flood Hope Road location did not go through. CAO did not indicate any concerns but did express the St. Elmo Road location was further away from Hope and may impact the potential economic benefits Hope would get from workforce hosting.	The camp in this area is not sized to the workforce peak, and communities will have economic opportunities related to hosting of non-local workers that exceed the designed camp capacity. Trans Mountain's anticipates that commercial accommodation and services in Hope will be used by Project workers. Contractors will conduct additional investigations with the local chamber of commerce, hoteliers and RV park managers in Hope with the aim of identifying interested suppliers and the Contractor will prepare guidance and specifications for workers with respect to available accommodation venues.	Section 3.9, where a different camp location is presented.

TABLE A-5 Cont'd

Stakeholder Group/ Agency Name	Method of Contact	Date of Consultation Activity	Feedback/Stakeholder Response	Trans Mountain Response	Where Addressed in the Plan
MLA Throness	August 10, 2017	Email – outgoing Email - incoming	L. Throness emailed Team Member and inquired if L. Throness can pass along the information to the residents that have contacted L. Throness.	Team Member emailed L. Throness to provide an update regarding the St. Elmo Road location under consideration for temporary workspace and a worker accommodation camp. Team Member stated that the location has been removed from the list of temporary facilities, and Trans Mountain is investigating alternate locations. Team Member noted that Trans Mountain is sending a letter to the St. Elmo Road neighbours regarding the change.	Section 3.9, where a different camp location is presented.
Neighbours and local concerned residents	August 10, 2017	Letter	No response	Trans Mountain sent a letter in response to letter received on July 5, 2017 from residents outlining concerns regarding the proposed St. Elmo Road camp location. The letter was also sent to local elected officials. The response letter to neighbours confirmed Trans Mountain was no longer considering the St. Elmo Road site as a proposed camp location.	Section 3.9, where a different camp location is presented.

3.3 Aboriginal Groups

Since April 2012, Trans Mountain has engaged with Aboriginal groups who might have an interest in the Project or have Aboriginal interests potentially affected by the Project, based on the proximity of their community and their assertion of traditional and cultural use of the land along the pipeline corridor to maintain a traditional lifestyle. The objectives of Aboriginal engagement are to:

- have an open, transparent and inclusive process that seeks to exchange information in a respectful manner;
- address concerns shared by those who might have an interest in the Project or have Aboriginal interests potentially affected by the Project;
- incorporate feedback into Project planning and execution; and
- provide opportunities to maximize Project benefits to Aboriginal communities and Aboriginal groups.

A comprehensive Aboriginal engagement process is led by experienced engagement advisors in AB and BC, specialized in the areas of Aboriginal relations, law, economic development, education, training, employment and procurement. Trans Mountain’s engagement process for the Project is flexible, allowing each community and group to engage in meaningful dialogue in the manner they choose and in a way to meet their objectives and values.

Each community had the opportunity to engage with Trans Mountain, depending on Project interests and potential effects. The following opportunities to engage have been provided:

- Project announcement;
- initial contact with Aboriginal community or Aboriginal group;
- meetings with Chief and Council and meetings with staff;
- host community information session(s);

- conduct Traditional Land Use (TLU) studies and socio-economic interviews;
- identify interests and concerns; and
- identify mitigation options.

Trans Mountain continues to liaise with Indigenous and Northern Affairs Canada, the Government of Canada's Major Projects Management Office, the BC Ministry of Aboriginal Relations and Reconciliation, and the Alberta Ministry of Aboriginal Affairs to provide updates regarding Trans Mountain's engagement activities with Aboriginal groups.

3.3.1 Identifying Aboriginal Groups for Consultation

Appendix D lists the Aboriginal groups identified for consultation on the draft NEB WAS. Throughout regular engagement with TMEP, any Aboriginal groups would have been added to the list if they had identified the worker accommodation strategy as a concern.

3.3.2 Consultation Activities

A letter was sent to the Aboriginal groups listed in Appendix D with a copy of the draft Plan in February 2017. Where appropriate and upon request, a follow up meeting was arranged to discuss this Plan in more detail and address any concerns. No feedback was received on the WAS or through other engagement related to potential camp sites.

Trans Mountain provided email notification of an updated copy of NEB Condition 59 (as an Appendix of BC EAO Condition 23, which contains additional information about Aboriginal groups in relation to camps) to potentially affected Aboriginal groups on August 14, 2017. Feedback was requested, and a comment period of 30 days was provided for Aboriginal groups to respond. Other than the discussion noted with Cheam First Nation leasing the CHE053 site (see Section 3.4, Table A-6 of this Appendix), no concerns have been raised by, and no feedback has been received from, any of the Aboriginal groups thus far regarding camp locations.

The final WAS will be shared with the Aboriginal groups at the same time it is filed with the NEB in 2017.

3.4 Landowners/Tenants

Trans Mountain has implemented a comprehensive landowner engagement process for the TMEP to:

- ensure landowners are informed of the Project and how it may affect them;
- enable landowners to gain an understanding of their rights under the *NEB Act*, and the regulatory process and their opportunities for comment within the NEB regulatory process, and
- have a number of opportunities to discuss the Project, identify my concerns or questions they may have with the Project, and have those questions and concerns addressed by Trans Mountain.

In addition to these opportunities for engagement, Trans Mountain is required to provide formal notifications of landowners under Sections 87 and 34 of the *NEB Act*, and Trans Mountain has or will, at the appropriate time, provide such notices.

Individual landowners and tenants have different preferences with respect to communications, and Trans Mountain tailors its communications as requested. Land representatives working for Trans Mountain have been in discussions with landowners for over three years, and issues or concerns raised with land agents have been documented in the Project landowner database, addressed within site-specific construction plans and documented within the land rights agreements. Trans Mountain has filed reports with the NEB providing details on the landowner engagement program and results to date. In accordance with NEB Condition 99, records of engagement and consultation with landowners and tenants will be filed with the NEB at least two months prior to commencing construction and every six months thereafter until five years after commencing Project operations.

Trans Mountain's landowner/tenant consultation strategy includes the activities described below.

- Prior to Project approval - obtain landowner permission for survey, provide information on the project and landowner rights, provide copies of land agreement documents to the landowners for their review and consideration, dialogue with each landowner to answer questions and address concerns raised by landowners, provide Project updates, and disseminate any other information necessary to satisfy landowner requests and regulatory requirements. After addressing outstanding questions and issues, obtain land agreements from landowners voluntarily. Land agreements have and will address specific landowner concerns regarding construction and reclamation activity.
- After obtaining a CPCN from the NEB, Trans Mountain will provide Section 34 notices indicating the detailed route for the pipeline and the specific lands affected by the Project, and complete any additional regulatory procedures required prior to commencement of construction, including providing reasonable notice through land agents of commencement date and activities. Trans Mountain land representatives will continue to maintain contact with landowners through construction to answer questions and address any issues that may arise. Following construction, maintain communication with landowners to discuss reclamation activities and timing. Upon completion of reclamation, Trans Mountain will transition the Project land program to operations.

Respecting this report, Trans Mountain notified landowners by letter in September 2016 that NEB Condition plans were being released for consultation and feedback. The landowner notification letter requested that landowners review the reports available on the TMEP website, or alternatively contact their assigned land representative or Trans Mountain directly if they wished to receive hard copies of the reports to review. No responses or requests for copies of the reports were received by Trans Mountain and no concerns or questions about the reports were expressed by landowners.

Trans Mountain has been engaging with landowners as part of the camp site review and acquisition process. A summary of consultation activities with landowners/tenants regarding final camp locations to August 2017 is presented in Table A-6.

Trans Mountain will update the Board if any further consultation feedback resulting in outstanding issues and concerns is received regarding the final Clearwater camp site (CLE011). Trans Mountain will update the Board if any further consultation feedback resulting in outstanding issues and concerns is received regarding the Fraser Valley/Cheam camp site (CHE053).

TABLE A-6

SUMMARY OF CONSULTATION ACTIVITIES WITH LANDOWNERS/TENANTS REGARDING FINAL CAMP LOCATIONS

Landowner / tenant	Method of Contact	Date of Consultation Activity	Information Provided by TMEP	Landowner/Tenant Feedback, Issues and Concerns	Trans Mountain Response to Issues and Concerns	Description and Justification of how Trans Mountain Incorporated this into the Strategy	Summary of Outstanding Issues and Concerns Related to this Engagement
Valemount Camp							
H. Park	Phone	April 18, 2017	Phone call to owner to express interest in leasing properties and confirmation of availability.	n/a	n/a	n/a	n/a
H. Park	Email	April 24, 2017	Information on property areas of interest to TMEP. Provided Option to Lease document and the lease document to owner.	n/a	n/a	n/a	n/a
H. Park	Email	April 25, 2017	Revised sketch of proposed lease area.	Owner concerned with the area that intended for lease on the northern property as there is interest in developing that area. Owner provided a revised sketch of the area that is available	Reviewed the revised sketch that was provided by the owner and accepted the proposed changes. Drafted up a new plan to match the owner's suggestion.	n/a	n/a
H. Park	Email	April 30, 2017	n/a	Email received from the owner with changes to the Option to lease and the lease document.	Review and discussion of lease changes. Owner accepted the response given.	n/a	n/a
H. Park	Email	June 5, 2017	In preparation for meeting on June 6 th , TMEP provided a final copy of the Option to Lease and Lease agreement for review	n/a	n/a	n/a	n/a
H. Park	Meeting	June 6, 2017	Meeting with owner to execute the Option to Lease document.	n/a	n/a	n/a	n/a
H. Park	Meeting	July 31, 2017	Meeting with owner to sign lease agreement	n/a	n/a	n/a	n/a
Blue River Camp							
TNRD – Sherri Madden	Phone/Email	April 5, 2017	Phone conversation expressing the desire to lease the property for a Camp location. Followed up on the conversation with an email and a copy of the sketch plan.	Sherri will discuss internally	n/a	n/a	n/a
TNRD – Sherri Madden	Email	May 15, 2017	Email received from Sherri; they are still reviewing internally	n/a	n/a	n/a	n/a
TNRD – Sherri Madden	Email	May 15, 2017	Email to Sherri providing her with a letter on Intend to lease the lands, a copy of the Option to Lease document, and a copy of the Lease Document	n/a	n/a	n/a	n/a

TABLE A-6 Cont'd

Landowner / tenant	Method of Contact	Date of Consultation Activity	Information Provided by TMEP	Landowner/Tenant Feedback, Issues and Concerns	Trans Mountain Response to Issues and Concerns	Description and Justification of how Trans Mountain Incorporated this into the Strategy	Summary of Outstanding Issues and Concerns Related to this Engagement
TNRD – Allysa Gredling	Email	May 24, 2017	Received letter of consent from TNRD, with conditions	Create mitigation measures to protect the Blue River water system wells and pump house and a pioneer grave. The TNRD would like to have input into locations of certain improvements.	TMEP will conduct a survey of the land and identify the features mentioned. TMEP will work with the TNRD to ensure these features are protected. These concerns are outstanding and the TNRD and TMEP recognize that these issues will be addressed prior to entering into a formal lease document.	n/a	TMEP is creating a mitigation plan with the TNRD to ensure that the water wells, pump house and pioneer grave are protected. TMEP is working with the TNRD to discuss what improvements will be made to the lands and how TMEP may be able to leave some improvements upon completion as a benefit to the TNRD.
Various rights holders (forest recreation, commercial recreation, trap line, etc.)	Email, Registered mail	August 8, 2017	Notification and map regarding Blue River camp application	One trap line holder interested in discussing the trap line.	Follow-up discussion and mapping with interested trap line holder will occur likely in September 2017 when holder returns from vacation	n/a	n/a
Clearwater Camp							
TNRD – Sherri Madden	Email	April 27, 2017	Email to Sherri providing her with a letter of Intent to lease the lands, a copy of the Option to Lease document, and a copy of the Lease Document	n/a	n/a	n/a	n/a
TNRD – Sherri Madden	Email	May 15, 2017	n/a	Letter received from TNRD stating that they will be making a recommendation for the proposed camp that will go to (TNRD) Board Meeting on June 15, 2017.	n/a	n/a	n/a
TNRD – Sherri Madden	Email	June 5, 2017	As per a request by the TNRD, TMEP provided revised copies of the letter of intent, Option to Lease Document and sample copy of the lease document.	n/a	n/a	n/a	n/a

TABLE A-6 Cont'd

Landowner / tenant	Method of Contact	Date of Consultation Activity	Information Provided by TMEP	Landowner/Tenant Feedback, Issues and Concerns	Trans Mountain Response to Issues and Concerns	Description and Justification of how Trans Mountain Incorporated this into the Strategy	Summary of Outstanding Issues and Concerns Related to this Engagement
TNRD – Sherri Madden	Email	June 13, 2017	n/a	Received copy of the Board recommendation from the TNRD that will be presented at the board meeting on June 15, 2017. (Trans Mountain confirms by way of meeting minutes from the June 15, 2017 TNRD Board meeting that the motion for TNRD to enter into an Option of Lease agreement with Trans Mountain for the establishment of a self-sustained construction camp and ancillary purposes was Carried)	n/a	n/a	n/a
TNRD – Sherri Madden	Email	June 30, 2017	n/a	Received executed Option to Lease Agreement from the TNRD			
Merritt Camp							
D. Chutter	Email	March 14, 2017	n/a	Received email from Owner through the Project email that he has land available for lease and would like the opportunity to lease to TMEP.	Responded to Owner stating that we would take this location into consideration when reviewing the required sites	n/a	n/a
D. Chutter	Phone	April 21, 2017	Phone conversation with owner and expressed interest in the property. Obtained Codes to gate so project personnel can have a look at the site. Owner will be out of Province for the next week.	n/a	n/a	n/a	n/a
D. Chutter	Email	April 24, 2017	Provided copy of Option to Lease and Lease agreement along with sketch plan to the owner.	n/a	n/a	n/a	n/a
D. Chutter	Meeting	May 10, 2017	Meeting with owner to review the document package previously sent.	Owner has no immediate issues, but wants to speak with his contractor who is currently working on the site.	n/a	n/a	n/a

TABLE A-6 Cont'd

Landowner / tenant	Method of Contact	Date of Consultation Activity	Information Provided by TMEP	Landowner/Tenant Feedback, Issues and Concerns	Trans Mountain Response to Issues and Concerns	Description and Justification of how Trans Mountain Incorporated this into the Strategy	Summary of Outstanding Issues and Concerns Related to this Engagement
D. Chutter	Meeting	May 16, 2017	n/a	Owner provided TMEP with a revised sketch of the area to avoid a scale site and a gravel deposit being used by his contractor. Owner also provided alternate areas that we can use to make up for the areas removed. Owner was also concerned with liabilities associated with our work.	TMEP reviewed the revised areas proposed by the owner and determined that this suggestion will work for TMEP. TMEP notified the owner that the revised are is acceptable. TMEP went over the indemnification clauses in the agreements that satisfied his concerns on liabilities.	n/a	n/a
D. Chutter	Meeting	May 25, 2017	Provided final documentation and the parties entered into the Option to Lease	Owner expressed concerns with the state that the area will be in during the term of the lease; concerns with garbage and does not want it blowing off lease in the event of high winds.	After the site is surveyed and a lease agreement finalized, TMEP will add in conditions to the lease document that TMEP shall take measures to keep the leased area tidy and prevent waste from being released into the environment.	The Strategy notes that key mitigation in the Temporary Construction Land and Infrastructure EPP will address this concern. Key measures noted include: collecting all construction waste materials on a regular basis and disposing of them at an approved facility and in accordance with the Waste Management Plan. Another key measure is ensuring that the temporary construction lands and infrastructure construction sites (which include camps) are left in a tidy and organized condition at the end of each day. Further, all garbage is to be stored in wildlife proof containers.	TMEP will provide a response to the owner on garbage material will be managed at the camp site.
D. Chutter	Meeting	July 28, 2017	Presented and reviewed the Notice of Exercise option to lease; executed agreements	n/a	n/a	n/a	n/a
Fraser Valley/Cheam Area							
Cheam First Nation (via Aboriginal Capacity Builders)	Meeting, Phone, Letter	July 25, 2017 – August 15	Site visit, discussions and information sharing about site possibilities and Trans Mountain's interests/intentions for a camp.	Interest in clarifying Trans Mountain's interests/intentions for a camp	Trans Mountain shared a letter with Cheam First Nation outlining intention and interest in leasing land on the Cheam First Nation.	n/a	n/a

TABLE A-6 Cont'd

Landowner / tenant	Method of Contact	Date of Consultation Activity	Information Provided by TMEP	Landowner/Tenant Feedback, Issues and Concerns	Trans Mountain Response to Issues and Concerns	Description and Justification of how Trans Mountain Incorporated this into the Strategy	Summary of Outstanding Issues and Concerns Related to this Engagement
Cheam First Nation	Email, Phone	August 15-16, 2017	n/a	Indicated a positive meeting with Chief and Council had taken place about the camp, and formal reply will be coming. Confirmed Trans Mountain should be receiving a formal letter of intent from Chief and Council shortly.	n/a	n/a	n/a
Cheam First Nation	Letter	August 23, 2017 (dated August 15, 2017)	n/a	Letter of Intent received from Cheam First Nation stating desire to provide Trans Mountain land for a camp, as well as land for a laydown yard.	Trans Mountain and its Contractors will continue to work in collaboration with the Cheam First Nation on camp site finalization, land acquisition, permitting, and operational requirements of the Fraser Valley/Cheam Hope camp.	As noted in Section 3.9 of the Strategy, this is the proposed final location of the camp for the Hope/Fraser Valley area.	n/a

APPENDIX B

CAMP AUTHORIZATIONS

This appendix outlines for informational purposes (in Tables B1 through B5) permits that may be required for the structure(s) and operational aspects of each camp, with the caveat that final permits required will depend on the final camp operational details and on-going engagement with local and provincial authorities.

TABLE B-1
CAMP PERMITS OVERVIEW – VALEMOUNT

Jurisdiction	Region	Responsible Agency	Permit	Legislation
Provincial	British Columbia	BC Ministry of Environment	Management of Industrial Wastewater and Storm Water (Camp)	<i>Environment Management Act</i>
Provincial	British Columbia	BC Ministry of Environment	Permit under Open Burning Smoke Control Regulation (Camp)	<i>Environment Management Act</i>
Provincial	British Columbia	BC Ministry of Environment	Waste Discharge Permit (Air Emissions - Waste Incineration Camp > 100 person)	<i>Environmental Management Act Waste Discharge Regulation Section 3 (7)</i>
Provincial	British Columbia	BC Ministry of Environment	Hazardous Waste Generator registration and carrier, facility registration	<i>Environmental Management Act - Hazardous Waste Regulation</i>
Provincial	British Columbia	BC Ministry of Environment	Waste Storage	<i>Environment Management Act</i>
Provincial	British Columbia	BC Ministry of Environment	Operator Certification - under the Environmental Operators Certification Program (EOCP)	<i>Environmental Operators Certification Program</i>
Provincial	British Columbia	BC Ministry of Environment	Waste Discharge Regulation Compliance	<i>Environment Management Act</i>
Provincial	British Columbia	BC Ministry of Environment	Waste Discharge Permit (Camp)	<i>Environment Management Act</i>
Provincial	British Columbia	BC Oil and Gas Commission	Campsite (NEB Ancillary) - Site B Valemount Yellowhead Camp and Stockpile Site	--
Federal	Canada	Environment and Climate Change Canada	A facility which collects an average daily volume of 100m ³ and discharges to surface water may be applicable.	<i>Waste Water Systems Effluent Regulation</i>
Provincial	British Columbia	Emergency Management BC	Design standard for facilities	<i>Fire Services Act</i>
Regional	Fraser Ft. George Regional District	Fraser Fort George Regional District	Building Permit (any building greater than 10m ²)	Regional Permits
Regional	Fraser Ft. George Regional District	Fraser Fort George Regional District	Notification Sign	Development Applications Procedure Bylaw No. 2776, 2012
Regional	Fraser Ft. George Regional District	Fraser Fort George Regional District	Temporary Use Permit (Camp, Pipe lay down, construction of unattended utility under Bylaw 2892 (Or alternatively a bylaw amendment)	Regional Permits
Regional	Fraser Ft. George Regional District	Fraser Fort George Regional District	Works in a Riparian Area (Valemount and all unincorporated areas)	Fisheries Protection Act
Regional	Fraser Ft. George Regional District	Fraser Fort George Regional District	Liquid and Solid Waste Disposal Arrangements	<i>Negotiated Services</i>

TABLE B-1 Cont'd

Jurisdiction	Region	Responsible Agency	Permit	Legislation
Regional	Fraser Ft. George Regional District	Landfills	Solid waste landfill onsite	<i>Municipal landfill codes</i>
Provincial	British Columbia	Ministry of Forests, Lands and Natural Resource Operations	Heritage Inspection Permit - Clearance	<i>Heritage Conservation Act</i>
Provincial	British Columbia	Ministry of Health	Camp Construction Permits	<i>Public Health Act</i>
Provincial	British Columbia	Ministry of Health	Camp Operation Permit	<i>Public Health Act</i>
Provincial	British Columbia	Ministry of Health	Industrial Camps Regulation	<i>Public Health Act</i>
Provincial	British Columbia	Ministry of Health	Sewerage System Regulation	<i>Public Health Act</i>
Provincial	British Columbia	Ministry of Health -Northern Health Authority (Valemount)	Drinking Water Supply Construction or Operating Permit	<i>Drinking Water Protection Act</i>
Provincial	British Columbia	Ministry of Health -Northern Health Authority (Valemount)	Permit to Operate a Food Premise	<i>Food Premises Regulation</i>
Provincial	British Columbia	Ministry of Health -Northern Health Authority (Valemount)	Sewerage System Permit (Discharge to Ground or Water based on a slow rate). Not required when a holding tank is used.	<i>Public Health Act</i>
Provincial	British Columbia	Ministry of Transportation and Infrastructure	Sign Permit	<i>Transportation Act</i>
Provincial	British Columbia	Ministry of Transportation and Infrastructure	Access Permit	<i>Transportation Act</i>
Municipal	Fraser Ft. George Regional District	Valemount	Noise Bylaw	

TABLE B-2

CAMP PERMITS OVERVIEW – BLUE RIVER

Jurisdiction	Region	Responsible Agency	Permit	Legislation
Provincial	British Columbia	BC Ministry of Environment	Management of Industrial Wastewater and Storm Water (Camp)	<i>Environment Management Act</i>
Provincial	British Columbia	BC Ministry of Environment	Permit under Open Burning Smoke Control Regulation (Camp)	<i>Environment Management Act</i>
Provincial	British Columbia	BC Ministry of Environment	Waste Discharge Permit (Air Emissions - Waste Incineration Camp > 100 person)	<i>Environmental Management Act Waste Discharge Regulation Section 3 (7)</i>
Provincial	British Columbia	BC Ministry of Environment	Hazardous Waste Generator registration and carrier, facility registration	<i>Environmental Management Act - Hazardous Waste Regulation</i>
Provincial	British Columbia	BC Ministry of Environment	Waste Storage	<i>Environment Management Act</i>
Provincial	British Columbia	BC Ministry of Environment	Operator Certification - under the Environmental Operators Certification Program (EOCP)	<i>Environmental Operators Certification Program</i>
Provincial	British Columbia	BC Ministry of Environment	Waste Discharge Regulation Compliance	<i>Environment Management Act</i>
Provincial	British Columbia	BC Ministry of Environment	Waste Discharge Permit (Camp)	<i>Environment Management Act</i>

TABLE B-2 Cont'd

Jurisdiction	Region	Responsible Agency	Permit	Legislation
Federal	Canada	Environment and Climate Change Canada	A facility which collects an average daily volume of 100m ³ and discharges to surface water may be applicable.	<i>Waste Water Systems Effluent Regulation</i>
Provincial	British Columbia	Emergency Management BC	Design standard for facilities	<i>Fire Services Act</i>
Regional	Thompson-Nicola Regional District	Landfills	Solid waste landfill onsite	<i>Municipal landfill codes</i>
Regional	Thompson-Nicola Regional District	Thompson-Nicola Regional District	Liquid and Solid Waste Disposal Arrangements	<i>Negotiated Services</i>
Regional	Thompson-Nicola Regional District	Landfills	Solid waste landfill onsite	<i>Municipal landfill codes</i>
Provincial	British Columbia	Ministry of Forests, Lands and Natural Resource Operations	Heritage Inspection Permit - Clearance	<i>Heritage Conservation Act</i>
Provincial	British Columbia	Ministry of Health	Camp Construction Permits	<i>Public Health Act</i>
Provincial	British Columbia	Ministry of Health	Camp Operation Permit	<i>Public Health Act</i>
Provincial	British Columbia	Ministry of Health	Industrial Camps Regulation	<i>Public Health Act</i>
Provincial	British Columbia	Ministry of Health	Sewerage System Regulation	<i>Public Health Act</i>
Provincial	British Columbia	Ministry of Health - Interior Health Authority	Permit to Operate a Food Premise	<i>Food Premises Regulation</i>
Provincial	British Columbia	Ministry of Health - Interior Health Authority	Sewerage System Permit (Discharge to Ground or Water based on a slow rate). Not required when a holding tank is used.	<i>Public Health Act</i>
Provincial	British Columbia	Ministry of Health -Interior Health Authority	Drinking Water Supply Construction or Operating Permit	<i>Drinking Water Protection Act</i>
Provincial	British Columbia	Ministry of Transportation and Infrastructure	Sign Permit	<i>Transportation Act</i>
Provincial	British Columbia	Ministry of Transportation and Infrastructure	Access Permit	<i>Transportation Act</i>
Regional	Thompson-Nicola Regional District	Thompson-Nicola Regional District	Building Regulations (Bylaw No. 2066, 2005) (BP PS Only)	<i>Regional Permits</i>
Regional	Thompson-Nicola Regional District	Thompson-Nicola Regional District	Development Application - Component	<i>Provincial Riparian Areas Regulation</i>
Regional	Thompson-Nicola Regional District	Thompson-Nicola Regional District	Development Application - Component Statement of Contaminated Site Waiver Form.	<i>Provincial Contaminated Sites Regulation</i>
Regional	Thompson-Nicola Regional District	Thompson-Nicola Regional District	Floodplain Exemption (if required)	<i>Local Government Act; Development Approval Procedures Bylaw</i>
Regional	Thompson-Nicola Regional District	Thompson-Nicola Regional District	Invasive Plant Program Pest Management (Plan for Invasive Plants and Problem Vegetation)	<i>Regional Permits</i>
Regional	Thompson-Nicola Regional District	Thompson-Nicola Regional District	Solid Waste Management / Recycling (3P Agt)	<i>Regional Service Agreement</i>
Regional	Thompson-Nicola Regional District	Thompson-Nicola Regional District	Temporary Use Permit	<i>Local Government Act; Development Approval Procedures Bylaw</i>

TABLE B-3

CAMP PERMITS OVERVIEW – CLEARWATER

Jurisdiction	Region	Responsible Agency	Permit	Legislation
Provincial	British Columbia	BC Ministry of Environment	Management of Industrial Wastewater and Storm Water (Camp)	<i>Environment Management Act</i>
Provincial	British Columbia	BC Ministry of Environment	Waste Discharge Permit (Air Emissions - Waste Incineration Camp > 100 person)	<i>Environmental Management Act Waste Discharge Regulation Section 3 (7)</i>
Provincial	British Columbia	BC Ministry of Environment	Open Burning Smoke Control Regulation (Camp)	<i>Environment Management Act</i>
Provincial	British Columbia	BC Ministry of Environment	Hazardous Waste Generator registration and carrier, facility registration	<i>Environmental Management Act - Hazardous Waste Regulation</i>
Provincial	British Columbia	BC Ministry of Environment	Waste Discharge Regulation Compliance	<i>Environment Management Act</i>
Provincial	British Columbia	BC Ministry of Environment	Waste Storage	<i>Environment Management Act</i>
Provincial	British Columbia	BC Ministry of Environment	Operator Certification - under the Environmental Operators Certification Program (EOCP)	<i>Environmental Operators Certification Program</i>
Provincial	British Columbia	BC Ministry of Environment	Waste Discharge Permit (Camp)	<i>Environment Management Act</i>
Municipal	District of Clearwater	District of Clearwater	Building Permit (Bylaw No. 129, 2014)	Bylaw No. 129, 2014
Municipal	District of Clearwater	District of Clearwater	Development Application	<i>Municipal Permits</i>
Municipal	District of Clearwater	District of Clearwater	Development Variance Permit	Development Approval Procedures Bylaw No. 1948
Municipal	District of Clearwater	District of Clearwater	Noise Bylaw # 14 Exemption Permit	<i>Municipal Permits</i>
Municipal	District of Clearwater	District of Clearwater	Official Community Plan (Bylaw No. 93)	Bylaw No. 93
Municipal	District of Clearwater	District of Clearwater	Temporary Use Permit	Development Approval Procedures Bylaw No. 1948
Provincial	British Columbia	Emergency Management BC	Design standard for facilities	<i>Fire Services Act</i>
Federal	Canada	Environment and Climate Change Canada	A facility which collects an average daily volume of 100m ³ and discharges to surface water may be applicable.	<i>Waste Water Systems Effluent Regulation</i>
Regional	Thompson-Nicola Regional District	Landfills	Solid waste landfill onsite	<i>Municipal landfill codes</i>
Provincial	British Columbia	Ministry of Forests, Lands and Natural Resource Operations	Heritage Inspection Permit - Clearance	<i>Heritage Conservation Act</i>
Provincial	British Columbia	Ministry of Health	Camp Construction Permits	<i>Public Health Act</i>
Provincial	British Columbia	Ministry of Health	Camp Operation Permit	<i>Public Health Act</i>
Provincial	British Columbia	Ministry of Health	Industrial Camps Regulation	<i>Public Health Act</i>
Provincial	British Columbia	Ministry of Health - Interior Health Authority	Drinking Water Supply Construction or Operating Permit	<i>Drinking Water Protection Act</i>
Provincial	British Columbia	Ministry of Health - Interior Health Authority	Permit to Operate a Food Premise	<i>Food Premises Regulation</i>
Provincial	British Columbia	Ministry of Health - Interior Health Authority	Sewerage System Permit	<i>Public Health Act, Sewage System Regulation</i>
Provincial	British Columbia	Ministry of Health - Interior Health Authority	Sewerage System Permit (Discharge to Ground or Water based on a slow rate). Not required when a holding tank is used.	<i>Public Health Act</i>

TABLE B-3 Cont'd

Jurisdiction	Region	Responsible Agency	Permit	Legislation
Provincial	British Columbia	Ministry of Transportation and Infrastructure	Sign Permit	<i>Transportation Act</i>
Provincial	British Columbia	Ministry of Transportation and Infrastructure	Access Permit	<i>Section 62 (1) of the Transportation Act</i>
Regional	Thompson-Nicola Regional District	Thompson-Nicola Regional District	Building Regulations (Bylaw No. 2066, 2005) (BP PS Only)	<i>Regional Permits</i>
Regional	Thompson-Nicola Regional District	Thompson-Nicola Regional District	Development Application - Component	<i>Provincial Riparian Areas Regulation</i>
Regional	Thompson-Nicola Regional District	Thompson-Nicola Regional District	Development Application - Component Statement of Contaminated Site Waiver Form.	<i>Provincial Contaminated Sites Regulation</i>
Regional	Thompson-Nicola Regional District	Thompson-Nicola Regional District	Floodplain Exemption (if required)	<i>Local Government Act; Development Approval Procedures Bylaw</i>
Regional	Thompson-Nicola Regional District	Thompson-Nicola Regional District	Operational Standard, pre-Application	<i>Pest Management Plan for Invasive Plants and Problem Vegetation</i>
Regional	Thompson-Nicola Regional District	Thompson-Nicola Regional District	Solid Waste Management / Recycling (3P Agt)	<i>Negotiated Agreements</i>
Regional	Thompson-Nicola Regional District	Thompson-Nicola Regional District	Temporary Use Permit	<i>Local Government Act; Development Approval Procedures Bylaw</i>
Regional	Thompson-Nicola Regional District	Thompson-Nicola Regional District	Liquid and Solid Waste Disposal Arrangements	<i>Negotiated Services</i>
Regional	Thompson-Nicola Regional District	Landfills	Solid waste landfill onsite	<i>Municipal landfill codes</i>

TABLE B-4

CAMP PERMITS OVERVIEW – MERRITT

Jurisdiction	Region	Responsible Agency	Permit	Legislation
Provincial	British Columbia	BC Ministry of Environment	Management of Industrial Wastewater and Storm Water (Camp)	<i>Environment Management Act</i>
Provincial	British Columbia	BC Ministry of Environment	Waste Discharge Permit (Air Emissions - Waste Incineration Camp > 100 person)	<i>Environmental Management Act Waste Discharge Regulation Section 3 (7)</i>
Provincial	British Columbia	BC Ministry of Environment	Open Burning Smoke Control Regulation (Camp)	<i>Environment Management Act</i>
Provincial	British Columbia	BC Ministry of Environment	Waste Storage	<i>Environment Management Act</i>
Provincial	British Columbia	BC Ministry of Environment	Hazardous Waste Generator registration and carrier, facility registration	<i>Environmental Management Act - Hazardous Waste Regulation</i>
Provincial	British Columbia	BC Ministry of Environment	Operator Certification -under the Environmental Operators Certification Program (EOCP)	<i>Environmental Operators Certification Program</i>
Provincial	British Columbia	BC Ministry of Environment	Waste Discharge Regulation Compliance	<i>Environment Management Act</i>
Provincial	British Columbia	BC Ministry of Environment	Waste Discharge Permit (Camp)	<i>Environment Management Act</i>
Provincial	British Columbia	Emergency Management BC	Design standard for facilities	<i>Fire Services Act</i>
Federal	Canada	Environment and Climate Change Canada	A facility which collects an average daily volume of 100m ³ and discharges to surface water may be applicable.	<i>Waste Water Systems Effluent Regulation</i>

TABLE B-4 Cont'd

Jurisdiction	Region	Responsible Agency	Permit	Legislation
Provincial	British Columbia	Interior Health Authority	Drinking Water Supply Construction or Operating Permit	<i>Drinking Water Protection Act</i>
Provincial	British Columbia	Interior Health Authority	Permit to Operate a Food Premise	<i>Food Premises Regulation</i>
Provincial	British Columbia	Interior Health Authority	Sewerage System Permit	<i>Public Health Act, Sewerage System Regulation</i>
Regional	Thompson-Nicola Regional District	Landfills	Solid waste landfill onsite	<i>Municipal landfill codes</i>
Provincial	British Columbia	Ministry of Forests, Lands and Natural Resource Operations	Heritage Inspection Permit - Clearance	<i>Heritage Conservation Act</i>
Provincial	British Columbia	Ministry of Health	Camp Construction Permits	<i>Public Health Act</i>
Provincial	British Columbia	Ministry of Health	Camp Operation Permit	<i>Public Health Act</i>
Provincial	British Columbia	Ministry of Health	Industrial Camps Regulation	<i>Public Health Act</i>
Provincial	British Columbia	Ministry of Health - Interior Health Authority	Drinking Water Supply Construction or Operating Permit	<i>Drinking Water Protection Act</i>
Provincial	British Columbia	Ministry of Health - Interior Health Authority	Permit to Operate a Food Premise	<i>Food Premises Regulation</i>
Provincial	British Columbia	Ministry of Health - Interior Health Authority	Sewerage System Permit	<i>Public Health Act, Sewerage System Regulation</i>
Provincial	British Columbia	Ministry of Health - Interior Health Authority	Sewerage System Permit (Discharge to Ground or Water based on a slow rate). Not required when a holding tank is used.	<i>Public Health Act</i>
Provincial	British Columbia	Ministry of Transportation and Infrastructure	Sign Permit	<i>Transportation Act</i>
Provincial	British Columbia	Ministry of Transportation and Infrastructure	Access	<i>Section 62 (1) of the Transportation Act</i>
Regional	Thompson-Nicola Regional District	Thompson-Nicola Regional District	Building Regulations (Bylaw No. 2066, 2005) (BP PS Only)	<i>Regional Permits</i>
Regional	Thompson-Nicola Regional District	Thompson-Nicola Regional District	Development Application - Component	<i>Provincial Riparian Areas Regulation</i>
Regional	Thompson-Nicola Regional District	Thompson-Nicola Regional District	Development Application - Component Statement of Contaminated Site Waiver Form. For Black Pines only.	<i>Provincial Contaminated Sites Regulation</i>
Regional	Thompson-Nicola Regional District	Thompson-Nicola Regional District	Floodplain and Riparian Areas	<i>Regional Permits</i>
Regional	Thompson-Nicola Regional District	Thompson-Nicola Regional District	Floodplain Exemption (if required)	<i>Local Government Act; Development Approval Procedures Bylaw</i>
Regional	Thompson-Nicola Regional District	Thompson-Nicola Regional District	Invasive Plant Program	<i>Regional Permits</i>
Regional	Thompson-Nicola Regional District	Thompson-Nicola Regional District	Operational Standard, pre-Application	<i>Pest Management Plan for Invasive Plants and Problem Vegetation</i>
Regional	Thompson-Nicola Regional District	Thompson-Nicola Regional District	Solid Waste Management / Recycling (3P Agt)	<i>Service Agreements</i>
Regional	Thompson-Nicola Regional District	Thompson-Nicola Regional District	Temporary Use Permit	<i>Local Government Act; Development Approval Procedures Bylaw</i>

TABLE B-4 Cont'd

Jurisdiction	Region	Responsible Agency	Permit	Legislation
Regional	Thompson-Nicola Regional District	Thompson-Nicola Regional District	Liquid and Solid Waste Disposal Arrangements	<i>Negotiated Services</i>
Regional	Thompson-Nicola Regional District	Landfills	Solid waste landfill onsite	<i>Municipal landfill codes</i>
Municipal	Thompson-Nicola Regional District	Merritt	Noise Bylaw	

TABLE B-5

CAMP PERMITS OVERVIEW – FRASER VALLEY/CHEAM AREA

Jurisdiction	Region	Responsible Agency	Permit	Legislation
Federal	Canada	Environment and Climate Change Canada	A facility which collects an average daily volume of 100m ³ and discharges to surface water may be applicable.	<i>Waste Water Systems Effluent Regulation</i>
Federal	Canada	Environment and Climate Change Canada	A facility which collects an average daily volume of 100m ³ and discharges to surface water may be applicable.	<i>Waste Water Systems Effluent Regulation</i>
Provincial	British Columbia	Ministry of Transportation and Infrastructure	Sign Permit	<i>Transportation Act</i>
Provincial	British Columbia	Ministry of Transportation and Infrastructure	Access Permit	<i>Section 62 (1) of the Transportation Act</i>

Note: Specific permit requirements related to the operation of an industrial camp on reserve land will be explored with the Cheam First Nation.

APPENDIX C

RECORD OF STAKEHOLDER NOTIFICATIONS OF STRATEGY

TABLE C-1

RECORD OF NOTIFICATION

Regulator/Stakeholder Group	Contact Name (if applicable)	Date	Method of Contact
Landowners	N/A	September 11, 2016	Letter
Aboriginal groups (see Appendix D)	N/A	February 9, 2017	Letter
Vancouver Fraser Port Authority	Patrick Coates	February 14, 2017	Email
Jasper National Park of Canada	Mayabe Dia	February 14, 2017	Email
Alberta Environment and Parks	Corinne Kristensen	February 14, 2017	Email
Alberta Environment and Parks	Margot Trembath	February 14, 2017	Email
Alberta Environment and Parks	Dave Hugelschaffer	February 14, 2017	Email
Alberta Environment and Parks	Muhammed Aziz	February 14, 2017	Email
BC Parks	Ken Morrison	February 14, 2017	Email
BC Oil and Gas Commission	Brian Murphy	February 14, 2017	Email
Ministry of Natural Gas Development	Linda Beltrano	February 14, 2017	Email
Forests, Lands and Natural Resource Operations	Susan Fitton	February 14, 2017	Email
Ministry of Transportation and Infrastructure	Lisa Gow	February 14, 2017	Email
Ministry of Transportation and Infrastructure	Kristen Johnson	February 14, 2017	Email
FVAQC	Roger Quan	February 14, 2017	Email
ECCC	Phil Wong	February 14, 2017	Email
ECCC	Rachel Mayberry	February 14, 2017	Email
ECCC	Coral Deshield	February 14, 2017	Email
Village of Valemount	N/A	February 15, 2017	Email
Regional District Fraser Fort George	N/A	February 15, 2017	Email
Northern Health- Prince George	N/A	February 15, 2017	Email
District of Clearwater	N/A	February 15, 2017	Email
RCMP-Clearwater	N/A	February 15, 2017	Email
City of Merritt	N/A	February 15, 2017	Email
RCMP-Merritt	N/A	February 15, 2017	Email
City of Kamloops	N/A	February 15, 2017	Email
City of Kamloops	N/A	February 15, 2017	Email
RCMP Kamloops	N/A	February 15, 2017	Email
Kamloops Hotel Association	N/A	February 15, 2017	Email
Thompson Nicola Regional District	N/A	February 15, 2017	Email
Interior Health	N/A	February 15, 2017	Email
City of Surrey	N/A	February 15, 2017	Email
Township of Langley	N/A	February 15, 2017	Email
City of Coquitlam	N/A	February 15, 2017	Email
Surrey Board of Trade	N/A	February 15, 2017	Email
Greater Langley Chamber	N/A	February 15, 2017	Email
Stoney Creek Environment Committee	N/A	February 15, 2017	Email
Eagle Creek Streamkeepers	N/A	February 15, 2017	Email
Yorkson Streamkeepers	N/A	February 15, 2017	Email
Surrey Environmental Partners	N/A	February 15, 2017	Email
LEPS	N/A	February 15, 2017	Email
Burke Mountain Naturalists / BC Nature	N/A	February 15, 2017	Email
City of Burnaby	N/A	February 15, 2017	Email
Metro Vancouver Regional District	N/A	February 15, 2017	Email

TABLE C-1 Cont'd

Regulator/Stakeholder Group	Contact Name (if applicable)	Date	Method of Contact
City of New Westminster	N/A	February 15, 2017	Email
Sapperton Fish and Game Club	N/A	February 15, 2017	Email
Burnaby Board of Trade	N/A	February 15, 2017	Email
District of Hope	N/A	February 15, 2017	Email
City of Chilliwack	N/A	February 15, 2017	Email
City of Abbotsford	N/A	February 15, 2017	Email
Fraser Valley Regional District	N/A	February 15, 2017	Email
City of Edmonton	N/A	February 15, 2017	Email
City of Spruce Grove	N/A	February 15, 2017	Email
Parkland County	N/A	February 15, 2017	Email
Strathcona County	N/A	February 15, 2017	Email
Town of Edson	N/A	February 15, 2017	Email
Town of Hinton	N/A	February 15, 2017	Email
Town of Stony Plain	N/A	February 15, 2017	Email
Village of Wabamun	N/A	February 15, 2017	Email
Yellowhead County	N/A	February 15, 2017	Email
ACGI Shipping	N/A	February 15, 2017	Email
BC Chamber of Shipping	N/A	February 15, 2017	Email
BC Coast Pilots (BCCP)	N/A	February 15, 2017	Email
Canadian Pacific (CP) Rail	N/A	February 15, 2017	Email
Canexus - Erco-Newalta-Univar Community Advisory Panel (CAP)	N/A	February 15, 2017	Email
Canexus Chemicals	N/A	February 15, 2017	Email
Chevron	N/A	February 15, 2017	Email
CN Rail	N/A	February 15, 2017	Email
Council of Marine Carriers	N/A	February 15, 2017	Email
District of North Vancouver	N/A	February 15, 2017	Email
Empire Shipping	N/A	February 15, 2017	Email
First Nation Emergency Services Society (FNESS)	N/A	February 15, 2017	Email
First Nation Health Authority	N/A	February 15, 2017	Email
Inchcape Shipping	N/A	February 15, 2017	Email
Island Tug and Barge	N/A	February 15, 2017	Email
Ledcor Resources & Transportation Limited Partnership	N/A	February 15, 2017	Email
Mason Agency (Shipping Service)	N/A	February 15, 2017	Email
MLA - North Vancouver Seymour	N/A	February 15, 2017	Email
MP - North Vancouver	N/A	February 15, 2017	Email
North Shore NOPE	N/A	February 15, 2017	Email
North Vancouver Chamber of Commerce	N/A	February 15, 2017	Email
Pacific Pilotage Authority	N/A	February 15, 2017	Email
Pacific Wildlife Foundation	N/A	February 15, 2017	Email
Seaspan	N/A	February 15, 2017	Email
SMIT Marine	N/A	February 15, 2017	Email
UBC Stellar Sea Lion (Marine Mammal) Research Centre	N/A	February 15, 2017	Email
Vancouver Aquarium	N/A	February 15, 2017	Email
Vancouver Board of Trade	N/A	February 15, 2017	Email
Vancouver Coastal Health Authority	N/A	February 15, 2017	Email
Vancouver Pile and Dredge	N/A	February 15, 2017	Email
Westward Shipping	N/A	February 15, 2017	Email
Wild Bird Trust	N/A	February 15, 2017	Email

APPENDIX D

ABORIGINAL GROUPS CONSULTED ON STRATEGY

- Adams Lake Indian Band
- Alexander First Nation
- Alexis Nakota Sioux Nation
- Aseniwuche Winewak Nation
- Enoch Cree Nation
- Ermineskin First Nation
- Kelly Lake Cree Nation
- Lheidli-T'enneh First Nation
- Little Shuswap Indian Band
- Nakcowinewak Nation of Canada
- O'Chiese First Nation
- Paul First Nation
- Samson Cree Nation
- Shuswap Indian Band
- Shuswap Nation Tribal Council
- Simpcw First Nation
- Stoney Nakoda First Nation
- Whitefish (Goodfish) Lake First Nation #128

APPENDIX E
TMEP WORKER CODE OF CONDUCT

TRANS MOUNTAIN EXPANSION PROJECT

WORKER CODE OF CONDUCT

May 2017



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1.0 OVERVIEW

This document outlines expectations and requirements regarding worker conduct for all people engaged in work activity during construction of the Trans Mountain Expansion Project (TMEP or the Project), including Trans Mountain Pipeline ULC (Trans Mountain) direct employees and employees and sub-contractors of companies contracted (Contractors) by Trans Mountain. All workers are ambassadors of the Project and are expected to act accordingly.

All Contractors hired by Trans Mountain during the construction phase shall have a Worker Code of Conduct for its employees and sub-contracted individuals related to their work on the Project. Each Contractor's Worker Code of Conduct must address the requirements in this TMEP Worker Code of Conduct.

Violation of any of the rules and principles contained in the TMEP Worker Code of Conduct, or Trans Mountain or Kinder Morgan Canada Inc. (KMC) policies, will result in discipline up to and including possible termination of employment or contract. Trans Mountain reserves the right to deny access to the worksite by any worker at any time for violations of this Worker Code of Conduct.

2.0 COMPLIANCE WITH LAW

Workers must comply with all applicable laws and regulations in the Project locations, including pipeline right-of-way, facility sites, camps, and the general Project area and surrounding communities. No one will commit or condone an unlawful act under federal, provincial or municipal law or instruct another employee or Contractor to do so.

3.0 HEALTH, SAFETY AND ENVIRONMENT

Trans Mountain is committed to providing a safe working environment for its employees and Contractors and ensuring safety of the public. All workers are required to follow: the TMEP Health and Safety Management Program, which includes the KMC Health and Safety Policy; Part 126, Duties of Employees, of the Canada Labour Code; Part 2 of the Alberta *Occupational Health and Safety Act* "obligation of employers, workers", etc.; British Columbia's *Workers Compensation Act*, Part 3, Division 3, Section 116 "General Duties of Workers"; the Canadian *Human Rights Act* as it pertains to construction worksite; and KMC's Workplace Violence, Harassment and Bullying Policies.

Workers must understand the nature of the Environmental Plan commitments and must follow all requirements outlined in the Environmental and Compliance Education Program required prior to starting work.

4.0 DRUG AND ALCOHOL USE

Trans Mountain has zero tolerance for use of, or being under the influence of, illicit drugs or alcohol during work hours. Workers must know and follow the requirements outlined in KMC's Drug and Alcohol Policy.

5.0 RESPECTFUL BEHAVIOUR/HARASSMENT

Workers must comply with KMC's Workplace Violence and Respect in the Workplace Policies. As such, workers are prohibited from harassing, discriminating against, threatening, bullying or intimidating other workers, visitors, community members, government officials, supervisors or managers in any way (and in particular from doing so on basis of race, national or ethnic origin, colour, religion, gender, age or mental or physical disability) at the workplace, in construction camps, and in local communities. This pertains to the utterance of threats of violence, real or implied, through any means (e.g., verbal, cyber).

All workers must comply with the Project's Aboriginal Relations Policy.

6.0 WORKPLACE VIOLENCE AND POSSESSION OF WEAPONS

Workers must comply with KMC's Firearms and Other Weapons Policy. As such, workers are prohibited from engaging in acts of violence, including fighting, at any time while working on the Project. Workers are also prohibited from bringing onto the worksite or onto any Project-related premise, or being in possession of any weapon including but not limited to guns, knives with the exclusion of those required for work purposes, and other types of weapons. Any item used to injure another person will also be viewed as a weapon.

7.0 DRIVING STANDARDS

The conduct of drivers while operating Project-related vehicles is important to worker safety and the safety of community residents and other road users, and to minimizing effects on local protective services. Workers must follow the Project driving standards outlined in the TMEP Health and Safety Management Program and Contractors own standards.

8.0 AFTER-HOURS CONDUCT

Trans Mountain expects all Project workers to conduct themselves in an appropriate manner at all times, including during their off hours. It is important that the people living in the vicinity of the Project are treated with respect and consideration during the Project construction timeframe. Workers residing in camps must abide by camp policies, and those residing in commercial residences are guests of the community.

To minimize pressure on local and regional medical, emergency, and social services, workers are expected to make use of available medical and social support services provided by Contractors to the extent possible.

Workers' use of community facilities and services may be perceived as positive or negative depending on the desires of the host community. Guidance, prohibitions and/or opportunities related to workers' off-duty use of community services, recreational facilities and outdoor recreation areas in specific communities in each spread must be included in each Contractor's Worker Code of Conduct as part of the Community Orientation Package/Program. Trans Mountain will ensure the Contractors understand the community's interests with respect to workers' use of local or regional recreational amenities, outdoor recreation areas or other community services in Project locations. Trans Mountain encourages worker volunteering in the community, recognizing it is a personal choice to do so.

Worker use and enjoyment of the environment when off-duty must be done in full compliance with all laws and regulations. With the exception of Aboriginal workers practicing traditional use in their Aboriginal group's asserted or established traditional territory while not on shift, Project workers are prohibited from hunting, fishing and trapping and gathering plants within or along the right-of-way and at other construction sites.

Workers are prohibited from possessing or storing any firearm, bows, or crossbows, whether or not concealed, at a Project worksite, on any Project owned or leased premises (including construction camps), or in work vehicles. Fishing equipment is prohibited at worksites and in work vehicles.

9.0 AWARENESS AND ENFORCEMENT

Contractors' Worker Codes of Conduct are expected to include a description of the process by which Contractors will ensure all workers are aware of and understand the Code of Conduct and of consequences for not following the Worker Code of Conduct. It is expected that all workers will, at a minimum, sign off on the Worker Code of Conduct that is applicable to them and their worksite.

Contractors' Worker Codes of Conduct should include guidance, as part of the Contractor's overarching disciplinary policy, on how discipline will be determined and implemented for all conduct categories.

Trans Mountain and KMC reserve the right to amend, update, revise or otherwise change the Code of Conduct expectations and rules at any time. Contractors will be made aware of any changes, and Contractors will be expected to update their Contractor Worker Codes of Conduct accordingly and communicate any changes in an effective and timely manner to all Project-related workers.

10.0 SUMMARY OF REFERENCED LAWS, REGULATIONS, POLICIES AND PROGRAMS

- *Alberta Occupational Health and Safety Act, Part 2*
- *Alberta Occupational Health and Safety Act, Part 35*
- *British Columbia Workers Compensation Act, Part 3, Division 3, Section 116*
- *British Columbia Occupational Health and Safety Regulation, Section 3.12*
- *Canada Labour Code, Part 126*
- *Canadian Human Rights Act*
- *Criminal Code of Canada, Section 217.1*
- *KMC's Health and Safety Policy*
- *KMC's Drug and Alcohol Policy*
- *KMC's Workplace Violence Policy*
- *TMEP Environmental Protection Plans*
- *TMEP Health and Safety Management Program*
- *TMEP Aboriginal Relations Policy*
- *KMC's Respect in the Workplace Policy*
- *KMC's Firearms and Other Weapons Policy*

APPENDIX B

ROLES AND RESPONSIBILITIES

Role	Responsibilities
Role	Leadership Team
Project Vice President (VP)	<ul style="list-style-type: none"> Accountable for the execution of TMEP Ensure Project is undertaken in compliance with all applicable legal requirements, Environment, Health and Safety Policy, and applicable corporate procedures Ensure Trans Mountain has documented policies and goals, and continues to be committed to the ongoing use of the Kinder Morgan Canada (KMC) Integrated Safety and Loss Management System (ISLMS) Major Projects Program In coordination with legal services, responsible for the NEB application for Leave to Open (LTO) prior to putting the TMEP into service Demonstrate leadership and direction to the Project Endorse and sign off on the Project Compliance Management Plan (CMP)
Project Directors	<ul style="list-style-type: none"> Provide leadership and direction to the environmental programs for the Major Projects Group Assume ultimate authority for environmental performance for the Major Projects Group Ensure that all NEB and BC EAO conditions have been met and appropriate environmental authorizations are in place Ensure there are sufficient, qualified and trained personnel to construct the Project in an environmentally responsible manner compliant all with applicable legal requirements, regulations, permit conditions, approval conditions and all commitments made by Trans Mountain Ensure suitable environmental programs (inspection and compliance) are in place to support Project execution Ensure environmental compliance audits are implemented and action items for the Project are followed through Monitors environmental performance through review of compliance reports, environmental incidents and follow-up actions Ensure Management of Change (MOC) procedures are in place and followed Ensure compliance and environmental responsibilities are integrated in all levels of the Project organization Endorse and sign off on the Project CMP
Project Manager(s)	<ul style="list-style-type: none"> Assure Contractors are constructing the Project in an environmentally responsible manner compliant all with applicable legal requirements, regulations, permit conditions, approval conditions and all commitments made by Trans Mountain Ensure compliance with specifications, and construction contracts and applicable codes Ensure Contractors understand the EPPs and environmental sensitivities of the Project during contracting process Ensure that construction plans and modifications to Project activities, schedules and issues are communicated in a timely manner to the appropriate personnel by using the Project MOC process Ensure environmental performance and compliance of the Contractor is a topic of discussion at regularly scheduled meetings Resolve conflicts between construction and environmental considerations Review environmental and compliance reports including incident reports and ensure corrective actions are completed Responsible for maintaining an open dialog with the Chief EI and Contractor supervisor Work closely with the Environment Manager, Chief EI and Contractor supervisor to assess levels of compliance achieved, evaluate the effectiveness of processes and ensure areas of continuous improvements are being implemented
Role	Corporate
KMC Legal Department	<ul style="list-style-type: none"> The KMC Legal Department will commission environmental compliance audits, which will be coordinated by the Environment Health and Safety (EHS) Department using the services of a third-party consulting firm. Senior Director Aboriginal and Legal to endorse and sign off on the Project Compliance Management Plan
EHS Department	<ul style="list-style-type: none"> Review environment performance Participate in monthly safety and environmental stewardship meetings to facilitate timely discussion of joint environmental issues and expectations The KMC Legal Department will commission environmental compliance audits, which is coordinated by the EHS Department using the services of a third-party consulting firm.

Role	Responsibilities
Role	Regulatory and Compliance Team (RCT)
Regulatory and Compliance Lead	<ul style="list-style-type: none"> • Report to the Project VP on regulatory compliance • Has delegated authority for all processes and procedures enabling compliance performance in support of Project execution • Work closely with senior Project personnel in implementing Compliance Programs within the CMP • Provide advice and interpretation of regulatory requirements and ensure compliance with Project specifications, applicable legal requirements, regulations, permits, approval conditions, and commitments • Ensure that KMC policies and the CMP that have been adopted by Trans Mountain are available and adhered to • Provide overall regulatory and compliance coordination for the Project • Work with Senior Directors and the Project Manager to ensure sufficient, qualified and trained personnel are in place to implement the Compliance Program and CMP • Work closely with the Manager, Permitting to ensure that environmental approvals and permits for construction are acquired • Along with other RCT members act as primary point of contact for the Project with regulatory authorities • Oversee the work of the Senior Compliance Advisor, Compliance Advisors, Conditions and Compliance Analysts • Work closely with the Environmental Manager, Senior Compliance Advisor to evaluate processes to ensure that they are working effectively to ensure compliance • Help to resolve conflicts between construction activities and regulatory considerations • Participate in Trans Mountain's compliance audits and reviews • Accountable for the filing of NEB Conditions, variance applications, and the acquisition of federal permits in support of Project construction • Review the weekly compliance report from the Senior Compliance Advisor • Read and understand the CMP and provide written acknowledgement
Senior Compliance Advisor	<ul style="list-style-type: none"> • Report to the Regulatory and Compliance Lead regarding compliance issues • Report to the Environmental Manager regarding environmental compliance issues • Develop, maintain and implement the CMP • Oversee the development and implementation of CMP • Work closely with Owner and Contractor Teams to evaluate compliance processes ensuring that they are working effectively and achieving desired results which will include site visits Support compliance activities for the Project • Provide advice and interpretation of regulatory requirements and ensure compliance with Project specifications, applicable legal requirements, regulations, permits, approval conditions, and commitments • Liaise with regulatory authorities to address concerns, maintain positive and effective communications • Accompany regulatory authority representatives on field reviews and inspections, where warranted • Communicate and address compliance issues raised by regulatory authorities • Responsible for statutory reporting of incidents on behalf of the TMEP • Coordinate and facilitate regulatory and compliance inspections and audits • Review MOC to determine if regulatory approval(s) are necessary • Receive RAI non-compliance reports and relay information and response actions to internal parties • Responsible for the preparation of the weekly compliance report • Maintain compliance tracking data base which will include all non-compliance issues and agency inspections • Analyze compliance tracking database to identify trends and apply learnings for continuous improvement • Maintain Compliance dashboard and issue advisories • Work closely with the Environment Manager to assess levels of compliance achieved, evaluate the effectiveness of processes and ensure areas of continuous improvements are being implemented • Read and understand the CMP and provide written acknowledgement

Role	Responsibilities
Role	Regulatory and Compliance Team (RCT)
Compliance Advisor <i>(TBD)</i>	<ul style="list-style-type: none"> • Report to the Senior Compliance Advisor regarding compliance issues • Deliver compliance tasks and commitments within the Project execution timeframes • Act as a resource to Project Execution Team, supporting the assessment of Project compliance with applicable legal requirements, regulations, permits, approval conditions, commitments and requirements contained within the Project Application • Work closely with Manager, Permitting to ensure regulatory authorities and construction management team have access to permit binders, commitments and conditions at construction offices • Liaise with regulatory authorities to address concerns, maintain positive and effective communications • Communicate compliance issues raised by regulatory authorities to Senior Compliance Advisor • Assist with coordination and development of TMEP's responses to regulatory agencies' questions on compliance activities • Assist with statutory reporting of incidents on behalf of the TMEP • Document reportable incidents, condition, commitment and permit compliance activities on a daily basis and maintain for inclusion in weekly compliance report • Assist with coordination and development of corrective and preventative action plans and communicate lessons learned for continuous improvement across the Project • Review Contractor daily reports of reportable incidents, condition, commitment and permit compliance activities and maintain information for inclusion in the weekly compliance report • Assist Senior Compliance advisor with the preparation of the weekly compliance report • Maintain Compliance dashboard and issue compliance advisories • Work closely with construction Contractor representatives to discuss conditions, commitments and permit conditions that must be met • Keep track of issues not immediately resolved by entering them into the Issues Tracking List • Provide listed issues to the Contractors to resolve in an agreed timeline before they escalate into a non-compliance • Liaise with other Compliance Advisor(s) to ensure consistency and timely communication of issues • Read and understand the CMP and provide written acknowledgement
Commitment Compliance Analyst	<ul style="list-style-type: none"> • Work with the Senior Compliance Advisor to develop and maintain a Commitment Tracking Table pursuant to NEB Condition 6 • Develop a quality assurance, quality control process to ensure the Commitment Tracking Table is comprehensive and accurate • Liaise with other Compliance Analysts to maintain the commitment tracking table including assisting with QAQC and associated processes • Work with multiple teams within TMEP who are responsible for the technical content of commitments • Prepare reports to assist teams with implementation, monitoring and completion of commitments • Maintain documentation demonstrating commitment completion • Ensure the Commitment Tracking Table is updated, posted to TMEP website and filed on time with the NEB • Ensure all documentation to support TMEP compliance is retained as per regulatory requirements • Prepare regulatory reports by collecting, analyzing and summarizing information • Help develop tools, forms, templates required as part of the CMP • Prepare a monthly report for the Senior Compliance Advisor on the status of commitment compliance filings • Work with Permit Specialist to ensure access to the Commitments Tracking Table at construction offices as part of the Project permit binder • Read and understand the CMP and provide written acknowledgement
Conditions Compliance Analyst	<ul style="list-style-type: none"> • Work with the Senior Compliance Advisor to develop and implement the process to manage NEB and BC EAO condition tracking and compliance pursuant to NEB Condition 1 and BC EAO Condition 5 • Develop a quality assurance, quality control process to ensure TMEP meets all requirements imposed under each specific condition • Implement a condition tracking process to facilitate coordination and execution of conditions across Project teams • Coordinates conditions schedule and filing plan using phased filings to support Project execution schedule • Coordinates application for Condition Relief in the event that a condition or elements of a condition cannot be fulfilled • Work with multiple teams within TMEP who are responsible for the technical content of condition compliance filings • Ensuring that all documentation to support TMEP compliance are retained as per regulatory requirements • Prepare a weekly report for the Senior Compliance Advisor on the status of condition compliance filings • Where required, liaise with regulatory agencies on condition compliance filings • Maintain NEB condition tracking system on TM web page linking condition compliance to NEB filings • Work with Permit Specialist to ensure access to condition documents at construction offices as part of the Project permit binder • Read and understand the CMP and provide written acknowledgement

Role	Responsibilities
Role	Environment Team
Environmental Manager	<ul style="list-style-type: none"> • Report to the Project Director and Project Manager on environmental compliance • Provide overall environmental coordination and communication for the Project • Provide overall direction on environmental matters • Direct the development and implementation of the environmental components of the Project, including the reinforcement of Owner's ISLMS and Owner's environmental management objectives • Oversee the commitment to attain high standards of environmental compliance, which will include site visits. Implement and monitor a Project-specific internal environmental audit plan and schedule • Maintain regulatory authority contacts, and work with regulatory agencies on environmental matters • Direct environmental inspection services • Work closely with the Senior Compliance Advisor in implementing the CMP to ensure applicable legal requirements, regulations, permits, approval conditions, and commitments are met • Work closely with the Manager, Permitting to ensure that environmental approvals and permits for construction are acquired • Work with Senior Directors and Project Manager to ensure sufficient, qualified and trained personnel are in place to implement the Environmental Compliance Program and CMP • Review Environmental Inspection reports to evaluate Project resource needs and compliance issues • Develop and oversee the Environmental Compliance and Education Program for the Project • Oversee the work of the Chief Environmental Inspector (EI) and the Environmental Resource Manager • Monitor environmental incidents and oversee corrective actions • Review weekly compliance report from the Senior Compliance Advisor • Read and understand the CMP and provide written acknowledgement
Chief Environmental Inspector (EI)	<ul style="list-style-type: none"> • Have overall responsibility for the Environmental Inspection Team, which includes the Lead EIs, EIs, and Aboriginal Monitors (AbMs) • Work with the TMEP Construction Representative to resolve conflicts that may occur between Contractors, Technical Inspectors, and EIs regarding environmental issues • Communicate clearly and on a timely basis with the Environmental Manager and the Senior Compliance Advisor regarding environmental issues including non-compliance issues • Coordinate with the Environmental Manager to ensure that appropriate environmental resources are onsite • Receive copies of all Owner and Contractor environmental reports, incident reports, Contractor environmental action plans and corrective action plans for the Project. • Provide a daily summary report to the Project Manager, Environmental Manager, and Senior Compliance Advisor on contractor compliance with Project mitigation requirements, permit conditions and environmental specifications • Ensure consistency in environmental inspection and reporting across all spreads • Review all EI reports and enter issues into the issues tracking list • Work with Environment Manager to review and comment on proposed changes through the MOC process • Read and understand the CMP and provide written acknowledgement
Lead EI	<ul style="list-style-type: none"> • Oversee the mitigation implemented in the field to verify it is timely, effective, appropriate and is in line with all Environmental Reference Documents (ERDs) • Consult with the Chief EI, as needed, during review of Contractor environmental action plans and implementation of Contingency Plans or non-standard mitigation strategies in the field, and corrective action plans • Receive copies of all Owner and Contractor environmental reports, incident reports, Contractor environmental action plans and corrective action plans for the Project • Work collaboratively with the Contractor team to maintain compliance • Manage the EIs, the AbMs, onsite Resource Specialists, and other Owner environmental representatives within their respective work sites • Read and understand the CMP and provide written acknowledgement

Role	Responsibilities
Role	Environment Team
Environmental Inspectors	<ul style="list-style-type: none"> • Monitor Project construction activities to ensure mitigation and contingency plans are being implemented to minimize environmental disturbance • Document environmental compliance and environmental activities on a daily basis and maintain a photographic record • Responsible for environmental issues resolution, field decision-making and reporting • Coordination with the TMEP Construction Representative, Chief Inspector, construction Contractor representatives and Environmental coordinators • Ensure that the Project is constructed in compliance with environmental conditions and requirements contained within the Project Application, environmental specifications, standards and permits through inspection and documentation • Accompany regulatory authority representatives on field reviews and inspections • Have the authority, in consultation with the Chief Inspector, to halt construction during specific non-compliance activities that have potential to have adverse effects on the environment in accordance with the EPP's • Inform the lead Inspector (for each spread) daily of the environmental issues in their area • Work closely with construction Contractor representatives to discuss environmental sensitivities and commitments that must be met • Assess work areas ahead of construction noting concerns, site-specific issues and site conditions, and provide advance notice to the TMEP Construction Representative, Lead Activity Inspectors, and Contractor Environmental Coordinators to allow proactive planning of the work to avoid adverse effects • Enforce compliance with environmental legislation, commitments, approvals and permits • Keep track of issues not immediately resolved by entering them into the Issues Tracking List • Provide listed issues to the Contractors to resolve in an agreed timeline before they escalate into a non-compliance • Oversee the implementation of the EPPs during all phases of construction (<i>i.e.</i>, flagging/staking, vegetation removal, topsoil/root zone material salvage, grading, sedimentation control, water withdrawal and activities in watercourses and wetlands) • Monitor compliance with environmental and socio-economic commitments, undertakings and conditions of permits and approvals, as well as applicable environmental legislation, Trans Mountain's policies, procedures, industry-accepted standards, procedures and industry-accepted standards. An EI may designate responsibility for environmental and socio-economic compliance monitoring in certain cases based on the nature of the activity and the availability of appropriate alternative personnel (<i>e.g.</i>, the Activity Inspector) • Review the Contractor's plan for site grade and site preparation to ensure that resource-specific features (<i>e.g.</i>, rare plants and rare ecological communities, archaeological sites, paleontological sites, wetlands, watercourses, wildlife and wildlife habitat sites, and Traditional Land Uses [TLUs]) are protected and not knowingly compromised as a result of construction activities • Provide advice on decisions or courses of action to deal with unexpected environmental matters (<i>e.g.</i>, a decision to shut down or modify construction due to wet/thawed soils) • Prepare, collect, organize and disseminate all environmentally-related information and documentation that arises during construction and will be responsible for the preparation of daily EI reports • Liaise with Appropriate Government Authorities and the Aboriginal Monitors assigned to the Project in co-operation with the TMEP Construction Representative and the Project Environmental Manager • Work with Resource Specialists that may be required to support the Project • Organize onsite meetings in consultation with the TMEP Construction Representative, as the need arises, to address resource-specific issues as well as review construction methodologies. • Read and understand the CMP and provide written acknowledgement
Resource Management Specialist	<ul style="list-style-type: none"> • Coordinate the work of the Resource Specialists to handle specific environmental sensitivities • Plan environmental specialist participation in the construction program • Ensure that schedule windows for wildlife are met • Ensure that appropriate equipment and materials are onsite to assess compliance with commitments • Read and understand the CMP and provide written acknowledgement
Resource Specialists (Archaeology, Aquatic, Reclamation etc.)	<ul style="list-style-type: none"> • Confirm if mitigation objectives have been met and provide feedback to the Environmental Inspection Team and TMEP Construction Representative • Provide input to work plans of specific activities such as deterring wildlife from the work area and soil handling • Provide input in the event of an unanticipated discovery of valued resources such as a cultural resource site that was not previously mapped • Assist the EIs as needed • Provide advice on mitigation measures for field issues and environmental resource features based on their specific areas of specialized training and experience • Read and understand the CMP and provide written acknowledgement
Aboriginal Monitors	<ul style="list-style-type: none"> • Work with the EIs and Resource Specialists to provide traditional knowledge to the construction program to ensure protection of the environment and heritage resources • Discuss traditional and western science elements with the EIs to ensure protection and monitoring • Monitor mitigation success in protecting the environment and heritage resources • Review and become familiar with the TLU and Traditional Ecological Knowledge (TEK) information in the area • Read and understand the CMP and provide written acknowledgement

Role	Responsibilities
Role	Permitting Team
Manager, Permitting	<ul style="list-style-type: none"> • Oversee all elements of permit acquisition and compliance • Confirm understanding of provincial and municipal permit requirements with regulatory authorities and handle any permit-related issues • Determine if regulatory approval is necessary for substantial changes to mitigation measures • Work with construction and engineering teams to determine and gather the information necessary to resolve environmental issues and to acquire new permits or permit revisions • Ensure that permit binders are kept up-to-date in the construction offices • Read and understand the CMP and provide written acknowledgement
Permit Specialist	<ul style="list-style-type: none"> • Manages permit development projects with internal teams and multiple disciplines and sub-contractors • Liaises with regulators to operationalize planning and receive and implement feedback on permit and plan drafts • Coordinates internal Information Request process on all permits from Provincial Regulators • Coordinate the Permit Amendment planning process with regulators, Contractors and consultants • Manage a Crown permit tracking system • Work closely with Manager, Permitting to ensure permit binders are kept up to date at construction offices • Read and understand the CMP and provide written acknowledgement
TMEP Construction Representative	<ul style="list-style-type: none"> • Ensure compliance with company specifications, permit conditions, construction contracts and applicable codes • Notify the Project Manager and the Environmental Manager of changes to the Project work schedule as defined in the application or permit using the MOC process • Actively participate with the Environmental Manager and the Senior Compliance Advisor to evaluate and improve environmental compliance • Coordinate with Chief Inspectors on work schedules, environmental sensitivities, environmental resource needs and permit conditions • Accompany regulatory authority representatives on field reviews and inspections • Conduct Project construction meetings to ensure that environmental compliance requirements are coordinated in daily activities • Read and understand the CMP and provide written acknowledgement
Chief Activity Inspector/QA Lead	<ul style="list-style-type: none"> • Ensure that the construction site is marked and flagged, as required, prior to construction • Liaise with regulatory authorities to address concerns, maintain positive and effective communications with regulatory authority representatives and facilitate agreement in the field • Communicate clearly and on a timely basis with the Lead EI regarding environmental issues and non-compliance issues • Have the authority, in consultation with the EI, to halt construction during specific non-compliance activities that have potential to have adverse effects on the environment in accordance with the EPP's • Communicate with the Environmental Resource Manager on Resource Specialists, as required, for specific activities and environmentally sensitive areas • Coordinate with the Permitting and Regulatory and Compliance team, as needed, on interpretation of permits and compliance issues throughout the Project • Inspect and document Contractor compliance with Project mitigation requirements, permit conditions and environmental specifications on a daily basis • Oversee environmental training activities for the construction spread • At the daily construction meeting, discuss issues or trends noted in the weekly Environmental Compliance Report • Read and understand the CMP and provide written acknowledgement
Activity Inspectors	<ul style="list-style-type: none"> • Understand the environmental commitments associated with construction activities they are tasked with supervising • Provide support in inspecting and ensuring compliance with the environmental requirements of their construction activity • Verify that environmental requirements and requests from the EIs are carried out by their assigned crews • Accompany regulatory authority representatives on field reviews and inspections • Read and understand the CMP and provide written acknowledgement

Role	Responsibilities
Role	Construction Team
Contractor (Supervisors, Foreman and Environmental Coordinators)	<ul style="list-style-type: none"> • Comply with all applicable legal requirements, regulations, permits, approval conditions, and commitments made by Trans Mountain • Demonstrate compliance and continual improvement through monitoring, reporting and training activities throughout the Project lifecycle • Monitor and report on compliance performance to RCT • Verify that all construction personnel attend the appropriate level of Environmental and Compliance Education training specified for the level of role and responsibility prior to work on the construction site • Assist with delivery of the Level I Environmental and Compliance Education Training • Ensure Project personnel have adequate experience in conducting their work so as to avoid or minimize environmental impacts • Understand the requirements of the EPPs and execute construction accordingly • Hold Construction Pre-job meetings • Provide site orientation and ensure all visitors are escorted by authorized personnel • Review compliance requirements including relevant permits and approval conditions and commitments prior to work occurring at the subject locations, update as required • Review environmental documentation to ensure complete understanding of environmental commitments related to the work prior to initiating work. Work with the EIs to ensure full understanding. Hold tailgate meetings to discuss environmental issues • Responsible for conducting the Project in an environmentally responsible manner and incorporating all Project environmental requirements into daily construction activities • Report observations of non-compliance to supervisory level personnel and the Senior Compliance Advisor as per the CMP • Report Incidents as per the Construction Health and Safety Management Plan • Record all spills immediately and provide copies to KMC in accordance with the spill reporting requirements for the appropriate jurisdiction • Report and discuss any deviation of work plans from those committed to in approved environmental documentation (EPPs, Environmental Assessment, etc.) with the Environmental Lead, EIs and/or Resident TMEP Construction Representative • Respond to any issued environmental incident investigation forms within 24 hours • Ensure adequate equipment is onsite and available to respond to environmental incidents • Ensure appropriate equipment is onsite to minimize environmental impacts • Ensure Project schedules are developed and maintained to allow timely regulatory/landowner notifications and to allow site-specific environmental plans to be developed at sensitive locations such as watercourse crossings • Assist KMC Construction and EIs with development of construction plans to deal with sensitive activities or areas • Co-operate with environmental compliance audits by Kinder Morgan's corporate EHS group • Implement EPP mitigation measures during construction • Respond to Environmental and Lead Activity Inspector requests during construction to ensure compliance with Project environmental requirements • Read and understand the CMP and provide written acknowledgement

APPENDIX C

ABORIGINAL GROUPS CONSULTED ON THE BC EAO WORKER ACCOMMODATION STRATEGY

- Adams Lake Indian Band
- Aitchelitz First Nation (Stó:lō)
- Ashcroft Indian Band (N'laka'pamux Nation)
- Boothroyd Indian Band (N'laka'pamux Nation)
- Boston Bar First Nation (N'laka'pamux Nation)
- Canim Lake Indian Band (Tsq'escenemc')
- Chawathil First Nation (Stó:lō)
- Cheam First Nation (Stó:lō)
- Coldwater Indian Band (N'laka'pamux Nation)
- Cook's Ferry Indian Band (N'laka'pamux Nation)
- Cowichan Tribes
- Halalt First Nation
- Hwlitsum First Nation
- Kwantlen First Nation (Stó:lō)
- Kwaw-kwaw-Apilt First Nation (Stó:lō)
- Lake Cowichan First Nation
- Leq'á:mel First Nation (Stó:lō)
- Lheidli-T'enneh First Nation
- Little Shuswap Indian Band*
- Lower Nicola Indian Band (N'laka'pamux Nation)
- Lower Similkameen Indian Band
- Lyackson First Nation
- Lytton First Nation (N'laka'pamux Nation)
- Matsqui First Nation (Stó:lō)
- Nicola Tribal Association
- Nlaka'pamux Nation Tribal Council
- Neskonlith Indian Band
- Nooaitch Indian Band (N'laka'pamux Nation)
- Okanagan Indian Band
- Okanagan Nation Alliance
- Oregon Jack Creek Band (N'laka'pamux Nation)
- Penelakut First Nation

- Penticton Indian Band (Okanagan Nation Alliance)
- Peters Band (Stó:lō)
- Popkum First Nation (Stó:lō)
- Scowlitz First Nation (Stó:lō)
- Seabird Island Band (Stó:lō)
- Shackan Indian Band (Nicola Tribal Council)
- Shxw'owhamel First Nation (Stó:lō)
- Simpcw First Nation
- Siska Indian Band (N'laka'pamux Nation)
- Skawahlook First Nation (Stó:lō)
- Skowkale First Nation (Stó:lō)
- Skuppah Indian Band (N'laka'pamux Nation)
- Skwah First Nation (Stó:lō)
- Soowahlie Indian Band (Stó:lō)
- Spuzzum First Nation (N'laka'pamux Nation)
- Squiala First Nation
- Stó:lō Collective
- Sts'ailes Band (Chehalis Indian Band) (Stó:lō)
- Sumas First Nation (Stó:lō)
- Tzeachten First Nation (Stó:lō)
- Union Bar Indian Band (Stó:lō)
- Upper Nicola Band (N'laka'pamux Nation)
- Upper Similkameen Indian Band (Okanagan Nation Alliance)
- Westbank First Nation (Okanagan Nation Alliance)
- Yakwekwioose First Nation (Stó:lō)
- Yale First Nation (Stó:lō)

**At time of submission, engagement is still in progress. Circulation of BC EAO WAS Rev 2 and Rev 3 was inadvertently missed for Little Shuswap Indian Band. Little Shuswap Indian Band did receive NEB WAS (Rev 1) showing the camp sites under consideration within their asserted traditional territory and no comment or feedback was received. On January 25, 2018, Trans Mountain circulated the Strategy to Little Shuswap Indian Band for a 30 day review and feedback period.*

APPENDIX D

CONSULTATION UPDATE (SEPTEMBER-DECEMBER 2017)

A summary of consultation feedback from Appropriate Government Authorities and Aboriginal groups between September and December 2017 related to the BC EAO WAS is presented in Table D-1.

TABLE D-1

**SUMMARY OF CONSULTATION FEEDBACK RELATED TO WORKER ACCOMMODATION STRATEGY
(SEPTEMBER TO DECEMBER 2017)**

Group/ Agency Name	Method of Contact	Date of Consultation Activity	Feedback/Stakeholder Response	Trans Mountain Response	Where Addressed in the Plan
Aboriginal Groups					
Nooaitch Indian Band	Email, Telephone	September 13 & 14, 2017	The Worker Code of Conduct is extremely short 2 pages in total and does not explicitly address concerns related to abuse or harassment of Aboriginal Women and Girls. As these types of After Hours Conduct are not always reported to the RCMP a no tolerance approach should be outlined in the awareness and enforcement requirements for contractors. Violations such as this should result in immediate dismissal. Also, mandatory reporting to the RCMP, for any unlawful act, abuse or harassment, use of drugs or alcohol, violence or possession of weapon - should be included in the Workers Code of Conduct and should be included in Contractual Agreements with General contractors and sub-contractors.	<p>Trans Mountain responded in writing to these concerns on September 18, 2017. Trans Mountain understands the importance of ensuring the presence of temporary workers is managed and related social effects are minimized. Trans Mountain is aware of recent studies and public discussions about the particular vulnerabilities of Aboriginal communities and Aboriginal women and children; studies have noted that Aboriginal women and youth are at a higher risk of gender-based violence given the existing systemic challenges on reserves and few services and programs or opportunities to support them (Firelight Group 2017). Trans Mountain understands the importance of ensuring mitigation is in place to limit Project-specific effects related to a temporary, largely-male workforce on vulnerable groups within construction communities.</p> <p>The Worker Code of Conduct, as presented in the Worker Accommodation Strategy, is a key mitigation that aims to reduce the potential for adverse social effects associated with the presence and behaviour of temporary workers, including effects on vulnerable groups. The issues of harassment, respectful behaviour (including on the basis of ethnicity and gender), lawfulness, drugs and alcohol, violence and possession of weapons are directly and overtly covered in the Code of Conduct.</p> <p>The Code of Conduct is a requirement of all Project workers and will be strictly enforced. Owner's policies are included in all contractual agreements. All General Construction Contractors are required to have and adhere to corresponding Codes of Conduct and have processes for enforcement and discipline.</p>	Section 5.4 and 5.5 Appendix A – NEB WAS, Appendix E
Neskonlith Indian Band	Email	September 20, 2017	Neskonlith Indian Band provided a copy of a letter dated September 19, 2017 addressed to Premier Horgan regarding their opposition to the Blue River Campsite Application. Key concerns included: displacing Indigenous use of the land; Aboriginal rights and title; long-term effects on land, water and the community; safety of land users and Indigenous women; violence against Indigenous women.	<p>Kinder Morgan Canada (KMC) sent a letter in response to Chief Wilson's September 19, 2017 letter to Premier Horgan. The letter confirmed the intent to continue engagement to better understand the concerns related to the Blue River Camp. The letter noted the Blue River Camp had been selected as a potential site for a temporary construction camp. The letter advised information on temporary camps had been included in the National Energy Board (NEB) application and BC Environmental Assessment Office (BCEAO) condition plans. The letter noted Thompson Nicola Regional District (TNRD) had confirmed support for the use of the site as a temporary camp. The letter provided information on the mitigation measures and remediation plans to reduce impacts of the site. The letter noted a meeting could be coordinated to discuss further.</p> <p>Related to the WAS in particular and regarding the environmental and social impacts of the Blue River camp, each camp site has been assessed to determine if there are any new or unique effects that were not considered in the original ESA and to identify specific environmental mitigation for each camp site (see NEB Condition 60 Filing ID A85798). The Temporary Construction Land and Infrastructure ESA pursuant to NEB Condition 60 specifically evaluates each temporary camp site to examine site-specific effects on traditional land and resource use and heritage/cultural resources, as well as site-specific effects related to natural resources that underpin Aboriginal traditional experiences and practices (e.g., wildlife, vegetation).</p>	Section 5.3 Section 5.4 Section 5.5

TABLE D-1 Cont'd

Group/ Agency Name	Method of Contact	Date of Consultation Activity	Feedback/Stakeholder Response	Trans Mountain Response	Where Addressed in the Plan
Neskonlith Indian Band (cont'd)				<p>Trans Mountain understands the importance of ensuring the presence of temporary workers is managed and related social effects are minimized. Trans Mountain is aware of recent studies and public discussions about the particular vulnerabilities of Aboriginal communities and Aboriginal women and children. Trans Mountain understands the possibility of issues related to temporary worker isolation, lack of support/connection and lack of cultural sensitivity, leading to adverse interactions with vulnerable community members. Trans Mountain understands the importance of ensuring mitigation is in place to limit Project-specific effects related to a temporary, largely-male workforce on vulnerable groups within construction communities. Trans Mountain has a range of mitigation in place to minimize the potential for adverse effects such as:</p> <ul style="list-style-type: none"> • Worker Code of Conduct and associated policies; • Environmental Compliance and Education Program for workers • Cultural Awareness Training for workers • Worker health and wellness supports • Camp security plan; • Project complaints process; and • Socio-economic effects monitoring plan, which will include opportunities to engage in an Aboriginal engagement roundtable process to discuss actual impacts and mitigation effectiveness as construction progresses. 	
Nicola Tribal Association Shackan Indian Band Nicomen Indian Band	In-person	September 27, 2017	<p>Feedback included concerns about</p> <ul style="list-style-type: none"> • the temporary workcamp in Merritt; • cultural effects along the highway • impact to women • shortage of doctors in the area; • effects of more people on the land (concentrated in an area of use). 	<p>On October 19, 2017 Trans Mountain provided a copy of the Worker Accommodation Strategy, and provided a summary of the mitigations for the impacts to Aboriginal women and children due to the temporary camp.</p> <p>Trans Mountain understands the importance of ensuring the presence of temporary workers is managed and related social effects are minimized. Trans Mountain is aware of recent studies and public discussions about the particular vulnerabilities of Aboriginal communities and Aboriginal women and children; studies have noted that Aboriginal women and youth are at a higher risk of gender-based violence given the existing systemic challenges on reserves and few services and programs or opportunities to support them (Firelight Group 2017). Trans Mountain understands the importance of ensuring mitigation is in place to limit Project-specific effects related to a temporary, largely-male workforce on vulnerable groups within construction communities.</p>	Section 5.4 Section 5.5 Section 6.0

TABLE D-1 Cont'd

Group/ Agency Name	Method of Contact	Date of Consultation Activity	Feedback/Stakeholder Response	Trans Mountain Response	Where Addressed in the Plan
Nicola Tribal Association; Shackan Indian Band; Nicomien Indian Band (cont'd)				<p>The Worker Code of Conduct, as presented in the Worker Accommodation Strategy, is a key mitigation that aims to reduce the potential for adverse social effects associated with the presence and behaviour of temporary workers, including effects on vulnerable groups. The issues of harassment, respectful behaviour (including on the basis of ethnicity and gender), lawfulness, drugs and alcohol, violence and possession of weapons are directly and overtly covered in the Code of Conduct.</p> <p>The Code of Conduct is a requirement of all Project workers and will be strictly enforced. Owner's policies are included in all contractual agreements. All General Construction Contractors are required to have and adhere to corresponding Codes of Conduct and have processes for enforcement and discipline.</p> <p>Trans Mountain will ensure camp operators develop an appropriately-scaled Health and Medical Services Plan (HMSP) for construction camps. HMSPs will be developed in consultation with the local health authority.</p> <p>Another key mitigation to reduce the effects of more people on the land is the Environmental Compliance and Education Program Level 1, which is required for all workers. This program covers a range of information important to ensuring workers are aware of the Project's environmental and social context and their responsibilities with respect to limiting environmental and social effects on communities. For example, the training covers Trans Mountain's environmental commitments; environmental responsibilities of Project workers; the local context associated with host communities and Aboriginal groups; health, safety and security matters; and the TMEP Worker Code of Conduct.</p>	
Alexander First Nation	Email	October 25, 2017	Inquired about support for a potential sleeper camp in Edson, Alberta.	<p>Trans Mountain is not planning a camp in Edson, as there is adequate commercial accommodation capacity to meet the needs of the Project.</p> <p>On October 30, 2017 Trans Mountain responded via email that the Project was committed to exploring any potential options to ensure there were no unnecessary challenges for accommodations for qualified Aboriginal workers, and advised TMEP, Midwest Pipeline and Alexander First Nation (AFN) would work together to identify potential accommodation gaps for Aboriginal workers and develop solutions that align with the Project execution plan.</p>	Appendix A – NEB WAS, Section 3.4
Nlaka'pamux Nation Tribal Council	Phone	October 26, 2017	Requested shapefiles for work camps	Trans Mountain provided shapefiles of camp locations to Nlaka'pamux Nation Tribal Council on October 27, 2017.	N/A
Neskonlith Indian Band	Email	November 29, 2017	Provided a copy of a letter dated November 29, 2017 addressed to Premier Horgan regarding the consultation process for the Blue River Campsite Application.	Please see Trans Mountain's response regarding the September 19, 2017 letter from Neskonlith Indian Band, noted above.	Section 5.3 Section 5.4 Section 5.5

TABLE D-1 Cont'd

Group/ Agency Name	Method of Contact	Date of Consultation Activity	Feedback/Stakeholder Response	Trans Mountain Response	Where Addressed in the Plan
Simpcw First Nation	Phone	December 8, 2017	Inquired whether consultation for the Blue River Campsite application had closed.	Trans Mountain confirmed the consultation window for the Blue River Campsite application had closed and noted availability for a follow up call to further discuss if necessary. Trans Mountain will continue to engage with Aboriginal groups – Terrestrial within whose boundary or asserted or established traditional territory or treaty lands a construction camp is located.	Section 2.0
Appropriate Government Authorities					
MOE	Conference Call	September 12, 2017	Request for Trans Mountain to include restrictions on snowmobiles in the Worker Code of Conduct in similar fashion to hunting and fishing equipment.	Trans Mountain augmented in the Code of Conduct provided to workers to note that snowmobiles and all-terrain vehicles not used for work on the Project are prohibited at worksites and in work vehicles	Section 5.2
FLNRO	Email	October 16, 2017	For Code of Conduct, requested that ATVs and snowmobiles are included in the list of equipment restricted at worksites and in work vehicles. The Code of Conduct does not adequately address the potential incremental environmental impacts that off-site recreation could have on environmental values or adequately inform employees of those risks and the specific regulations that would apply to them. The plan should do a better job of ensuring that employees are at least not naïve about the regulatory context and potential risk to various environmental values as well as restricting additional equipment that have the potential to have an impact on environmental values.	Trans Mountain augmented information in the Code of Conduct provided to workers to note that snowmobiles and all-terrain vehicles not used for work on the Project are prohibited at worksites and in work vehicles. Guidance, prohibitions and/or opportunities related to workers' off-duty use of community services, recreational facilities and outdoor recreation areas in specific communities in each spread will be included in each Contractor's Worker Code of Conduct as part of the Community Orientation Package/Program. Trans Mountain will ensure the Contractors understand the community's interests with respect to workers' use of local or regional recreational amenities, outdoor recreation areas or other community services in Project locations. Environmental effects of temporary workers themselves have also been included in the ESA, as noted in the Application ESA, namely that there may be increased public access to traditional harvesting areas and increased pressure on environmental resources. The Worker Code of Conduct contains reference to restrictions on hunting and fishing activities by non-Aboriginal workers in order to limit adverse effects on environmental resources near camps or other work locations. The Code of Conduct notes worker use and enjoyment of the environment when off-duty must be done in full compliance with all laws and regulations. It is noted that with the exception of Aboriginal workers practicing traditional use in their Aboriginal group's asserted or established traditional territory while not on shift, Project workers are prohibited from hunting, fishing and trapping and gathering plants within or along the right-of-way and at other construction sites. Fishing equipment, snowmobiles and all-terrain vehicles not used for work on the Project are prohibited at worksites and in work vehicles. The importance of such issues and areas of local sensitivity are addressed during mandatory worker training prior to site access in the Environmental and Compliance Education Program.	Section 5.2
BC OGC	Email, Phone	September 1, 6, 11, 25, 27, October 2, 2017	On-going discussion, information sharing and coordination regarding the referral of OGC Blue River camp application to Aboriginal groups for consultation.	See above Trans Mountain responses to Aboriginal group feedback.	N/A

TABLE D-1 Cont'd

Group/ Agency Name	Method of Contact	Date of Consultation Activity	Feedback/Stakeholder Response	Trans Mountain Response	Where Addressed in the Plan
Village of Valemount	In Person	September 12, 2017	As part of public hearing for TMEP camp Temporary Use Permit (TUP) application with Village of Valemount, three written submissions from residents were presented by village staff and one oral submission given by a citizen. Public concerns were related to the potential for increased traffic on a residential street (King Road). The camp does not border King Road and there will be no changes to traffic flow. The Village requested a secondary access for emergency use.	All concerns raised by the Village were addressed within the TUP application. Motion was passed by Council to approve the TUP for camp location. Contractors will continue to engage with Appropriate Government Authorities regarding camp operational details, including waste management plans, emergency response protocols, health and medical services requirements and protocols and camp permit requirements.	Appendix A – NEB WAS, Section 4.2
Village of Valemount	Email	September 26, 29, October 13, 27, November 20, 2017	On-going information exchange regarding operational aspects of camps, including: <ul style="list-style-type: none"> • fire suppression requirements • emergency response plan review prior to occupancy • snow load management emergency access road requirements	Contractors will continue to engage with Appropriate Government Authorities regarding camp operational details, including waste management plans, emergency response protocols, health and medical services requirements and protocols and camp permit requirements. Contractors are developing detailed permitting plans related to camp structures and operations and will continue to engage with local and provincial authorities on operational camp permits.	Appendix A – NEB WAS, Section 4.2, 4.3
BC OGC	Email	September 13, October 27, 30, 2017	Further explanation was sought regarding camp impact to recreation features and caribou mitigation and management.	Trans Mountain provided written responses to the BC OGC's Information Request for Blue River Camp on October 27, 2017 (OGC IR Blue River Camp AMS #100102935).	Addressed via direct information exchange with the OGC.
Fraser Valley Regional District	Email	September 13, 2017	Regarding the camp proposal on Cheam lands, Trans Mountain should be working with the District of Kent with respect to potential off-site impacts, traffic control, emergency response etc.	Trans Mountain sent an information package and a copy of the BC EAO WAS to the District of Kent, with opportunity for questions and feedback. Trans Mountain and its Contractors will continue to work with municipal and regional governments regarding camp site authorizations and permitting details as detailed construction planning continues.	Section 2.0
FLNRO	Email	September 15, 20 & 26, 29, 2017	Information exchanged related to a possible disturbance to a recreational trail related to the construction of the Blue River camp and the section 16 authorization process.	Trans Mountain has been working with the Thompson-Nicola Regional District and Project Contractor to identify and define site mitigations. FLNRO Sec. 16 authorization for trail (REC4602) was issued to Trans Mountain on September 29, 2017.	Addressed via direct information exchange with FLNRO
Thompson-Nicola Regional District	Email	October 12 & 30, 2017	Information provided on the relevant sections from both Thompson-Nicola Regional District and Clearwater bylaws on temporary construction camps. Clearwater site are located in the Agricultural Land Reserve and cannot be developed unless the ALR applications are approved. Information provided regarding building code requirements of camp structures.	Trans Mountain is aware of this and is working through the approval process with the Agricultural Land Commission. Contractors will continue to engage with Appropriate Government Authorities regarding camp operational details, including waste management plans, emergency response protocols, health and medical services requirements and protocols and camp permit requirements.	Appendix A – NEB WAS, Section 4.2

TABLE D-1 Cont'd

Group/ Agency Name	Method of Contact	Date of Consultation Activity	Feedback/Stakeholder Response	Trans Mountain Response	Where Addressed in the Plan
Thompson-Nicola Regional District	Email	October 4, 12 & 18, 2017	Information exchange regarding requirements to build and operate camps and office yards in both Clearwater and Blue River.	Contractors will continue to engage with Appropriate Government Authorities regarding camp operational details, including waste management plans, emergency response protocols, health and medical services requirements and protocols and camp permit requirements.	Appendix A – NEB WAS, Section 4.2
BC OGC	Email	November 9 & 10, 2017	Clarification was sought regarding camp boundaries and distances in relation to Blue River, as well as site drainage.	Trans Mountain provided clarification that the polygon of camp extent is approximately 15 m from the top of bank from the Blue River, and that site inspections did not identify any natural drainage patterns that would affect site development. Written response was provided to OGC on November 7, 2017 (OGC IR Blue River Camp AMS #100102935).	Addressed via direct information exchange with the OGC.

APPENDIX E

SOCIO-ECONOMIC EFFECTS MONITORING PLAN - OVERVIEW

Overview

Socio-economic effects monitoring is a tool to evaluate the effectiveness of socio-economic mitigation measures, to manage unintended socio-economic impacts of a project, to optimize positive project impacts, and as a means of communicating with affected stakeholders and Aboriginal groups in an ongoing manner.

Trans Mountain's Socio-Economic Effects Monitoring Plan (SEEMP) provides a pragmatic and meaningful way to monitor the potential adverse socio-economic effects of the Trans Mountain Expansion Project (TMEP or the Project) during construction, to examine mitigation effectiveness related to such potential effects, and to help identify the need and strategies for adaptive socio-economic management as Project construction progresses.

Trans Mountain's SEEMP is focused on monitoring factors or indicators that are reflective of the Project's contribution to socio-economic outcomes during the two-year construction window; that is, indicators of the social or economic stressors directly attributable to the Project. These "Project-specific indicators" will be used in pinpointing where and when a Project mitigation, policy or program intended to reduce potential adverse socio-economic effects during construction is working as planned or may need improvement or adaptation. Project-specific indicators will be the key tool that Trans Mountain uses to identify adverse effects of the Project in a timely manner and to develop adaptive social performance management strategies, where needed, in parallel, and in consideration of select stakeholder and Aboriginal group feedback during engagement,

Trans Mountain will also track and present data on broader socio-economic environment relevant to the Project area. While not meeting the criteria as "monitoring" indicators for the purposes of this Project-specific SEEMP, these "context indicators" will reflect the socio-economic backdrop in which construction is occurring and will assist in understanding the relative resiliency or vulnerability of different communities and regions in the context of Project-specific stressors.

Adaptive Management Process

Project-specific indicators have established management objectives and thresholds for action, which are used to guide decisions about mitigation review and adaptive management.

In general, adaptive management will address uncertainty related to the effectiveness of mitigation measures, and the possible occurrence of unexpected effects, both positive and negative. Adaptive management is a cycle in which the effectiveness of mitigation measures are evaluated based on monitoring results, and adjusted if needed, to achieve desired objectives.

Each quarter, Trans Mountain will compile socio-economic effects monitoring information and do an evaluation of emerging issues and themes related to socio-economic effects of the Project (as specifically as possible with respect to pipeline spread/facility and community location).

While adaptive management will be a continual process (*i.e.*, response will often happen in the short-term as an issue emerges in real-time), each SEEMP assessment and reporting period becomes an opportunity for reflection and course correction. The examination of issues and themes, in addition to a reporting of adaptations/improvements made during the monitoring cycle, allows for a process of continuous assessment and application of lessons learned across other regions or components of the Project or for the next wave of TMEP construction activity in a particular region.

Should unexpected effects occur, they will be reviewed with the appropriate Project personnel, with Project subject matter experts as needed, and with appropriate input/engagement by the affected community/stakeholder representative, so that locally-appropriate and scenario-specific adaptive

management opportunities can be explored and implemented. Any adverse effects during construction that trigger mitigation review will be escalated to the Trans Mountain Project Manager (for local issues) or Project Director (for Project-wide issues) to implement the mitigation review process.

Issue or incident-specific adaptive management reviews and outcomes conducted by Contractors will be reviewed and key changes in mitigation/management approaches that have occurred during each monitoring cycle will be documented. If an adverse effect escalates beyond being a specific local issue that cannot be quickly resolved with the correct implementation of an existing measure, it could lead to a revision of the appropriate Construction Execution Policies, Procedures and Plans or other construction-related plans. If response to an effect or issue requires modification to the Construction Execution Plans or other construction-related plan, the required changes will be communicated to the Contractor.

Public Reporting and Engagement

Trans Mountain will aggregate the monthly data collected internally, via Contractors and via other data mechanisms, including any updated information on context indicators that maybe available through external agencies. Trans Mountain will prepare regional Socio-Economic Monitoring Reports every three months (*i.e.*, quarterly) during construction, with the first Socio-Economic Monitoring Reports to be published within four months after the commencement of construction. A final Socio-Economic Effects Monitoring Report will be published within six months of the Project being in service. Along with the indicator data, the Socio-Economic Monitoring Reports will also provide discussion of any adaptive management strategies Trans Mountain and/or its Contractors have undertaken to improve socio-economic performance during construction as a response to the monitoring feedback.

Trans Mountain will publish each Socio-Economic Monitoring Report on the TMEP website. Trans Mountain will send notification to Appropriate Government Authorities (*i.e.*, local and regional governments, service providers) and Aboriginal groups with a web link to the pertinent regional Socio-Economic Effects Monitoring report. Trans Mountain will follow-up on stakeholder and Aboriginal group inquiries and questions about Socio-Economic Effects Monitoring Reports.

Project-Specific Indicators

Table E-1 summarizes the 14 Project-specific indicators in the SEEMP, including management objectives and thresholds for action. Discussion has been added (see Rationale for Indicator column) to note if and how each indicator relates to the management and reduction of potential social effects associated with worker accommodation. Where applicable, this discussion notes if and how each indicator pertains specifically to monitoring the social impacts of worker camps on Terrestrial Aboriginal Groups including Aboriginal women and children and other vulnerable groups.

TABLE E-1

SEEMP PROJECT-SPECIFIC INDICATORS AND HOW THEY RELATE TO SOCIAL IMPACTS OF WORKER CAMPS

Indicator	Applicable Monitoring Topic Area	Concern/Issue	Rationale for Indicator	Management Objective(s)	Threshold for action / mitigation evaluation	Action to be taken
<p>1. Number of worker-days¹ (by location) related to Project construction in field communities categorized by:</p> <p>a. Aboriginal status²: Aboriginal v. non-Aboriginal</p> <p>b. Geographic origin: Local v. regional v. non-regional or local³</p>	<ul style="list-style-type: none"> Community Way-of-Life Worker Accommodation Regional Infrastructure and Services 	<p>Project-Community Interactions</p>	<p>Provides indication of Project demand for local/regional labour. Provides indication of demographic make-up of labour force. Provides indication of number of workers being brought in from outside the Socio-economic Regional Study Area (RSA) that may create pressure points or opportunities for host communities.</p> <p>Worker Accommodation Strategy (WAS) notes: This indicator reflects the scale of the temporary workforce and Aboriginal make-up of the workforce – both residing in and out of camps - which may interface with the host community residents. This provides an indication of the possibility for social impacts related to temporary workers/work camps when considered in the context of the size of the local and regional population.</p>	<p>To provide timely information to affected communities and stakeholders about numbers and accommodation of non-local Project workers (<i>i.e.</i>, labour influx) in hub communities. To limit adverse effects related to the presence of non-local Project workers.</p>	<p>Number of non-local/regional workers by region/spread is +/- 20% different than estimated in Worker Accommodation Strategy NEB Condition 59 (Filing ID A85812).</p>	<p>Contractors work with Trans Mountain to provide revised forward construction workforce estimates to:</p> <ul style="list-style-type: none"> Municipal or regional government authorities health authorities social services police hotel / tourism associations chambers of commerce
<p>2. Number of worker-days (by location) related to construction in field communities categorized by accommodation arrangements:</p> <p>a. Non-local, staying in TMEP camps</p> <p>b. Non-local, not staying in TMEP camps</p> <p>c. Local or regional residing at home</p>	<ul style="list-style-type: none"> Worker Accommodation Regional Infrastructure and Services 	<p>Worker accommodation strategy (<i>e.g.</i>, housing demand pressure, opportunities for commercial accommodations and other local businesses)</p>	<p>Provides an indication of Project-related demand for local/regional housing and accommodation. Also provides indication of extent to which Project workers are supporting business opportunities for local/regional commercial accommodation and other retail service providers.</p> <p>WAS notes: This indicator reflects the scale of the temporary workforce and Aboriginal make-up of the workforce – both residing in and out of camps - which may interface with the host community residents. This provides an indication of the possibility for social impacts related to temporary workers/work camps when considered in the context of the size of the local and regional population.</p>	<p>Balance minimizing adverse impacts on local accommodation providers and infrastructure/services providers, with also providing positive opportunities for local businesses</p>	<p>Less than 75% of non-local workers are staying in camps (indicator #2a)</p> <p>and</p> <p>Qualitative feedback received about adverse issue or concern from local authority or tourism /hotel association representative.</p>	<p>Contractor to evaluate mechanisms to achieve the balance of accommodation mix desired by the local community. Report to Trans Mountain on any adaptive management measures identified.</p>

TABLE E-1 Cont'd

Indicator	Applicable Monitoring Topic Area	Concern/Issue	Rationale for Indicator	Management Objective(s)	Threshold for action / mitigation evaluation	Action to be taken
3. Living out allowance or related stipend ⁴ : a. Number of worker days paid b. Total value (\$)	<ul style="list-style-type: none"> Worker Accommodation 	Worker accommodation strategy (e.g., housing demand pressure, opportunities for commercial accommodations and other local businesses)	<p>Living out allowance, along with any similar stipend to cover incidentals for camp workers, are a reflection of economic benefit to local/regional business community, as this money is likely to be spent in local/regional communities during the construction period.</p> <p>WAS notes: The number of worker-days paid provides indication of Project use of local and regional commercial accommodation and/or /services and contribution to accommodation pressures.</p>	Balance minimizing adverse impacts on local accommodation providers and infrastructure/services providers, with also providing positive opportunities for local businesses	<p>An increase in the value of indicator 3(a) from the previous reporting cycle</p> <p>and</p> <p>Qualitative feedback received about adverse issue from local authority or tourism /hotel association</p>	Contractor to follow up with local authority or tourism/hotel association to identify underlying concern and intersection with accommodation approach. Report to Trans Mountain on any adaptive management measures identified.
4. Qualitative feedback about Project use of local/regional commercial accommodation (e.g., hotels, motels, campgrounds).	<ul style="list-style-type: none"> Worker Accommodation 	Worker accommodation strategy (e.g., housing demand pressure, opportunities for commercial accommodations and other local businesses)	<p>WAS notes: This provides indication of Project use of hotel/motel accommodation and feedback about associated benefits and issues. This indicator will provide information about any adverse use patterns within commercial accommodation by workers.</p>	Balance minimizing adverse impacts on local accommodation providers and infrastructure / services providers, with also providing positive opportunities for local businesses	Qualitative feedback received about adverse issue from local authority, tourism /hotel association or hotel used by Contractor	Contractor to evaluate and identify corrective action. Report to Trans Mountain on any adaptive management measures identified.
5. Number of full-time workers related to Project construction in field communities anticipated in next business quarter.	<ul style="list-style-type: none"> Community Way-of-Life Worker Accommodation Regional Infrastructure and Services 	Project-Community Interactions Worker Accommodation Strategy	<p>WAS notes: Provides an indication of anticipated number of workers present in next business cycle so that communities/agencies are aware of future Project activity and the anticipated number of temporary workers. This will aid in community readiness and planning.</p>	Provide timely information to affected communities and stakeholders about numbers and accommodation of non-local Project workers in hub communities.	N/A - this is a forward, informational indicator to assist stakeholders and Aboriginal groups in community readiness.	N/A

TABLE E-1 Cont'd

Indicator	Applicable Monitoring Topic Area	Concern/Issue	Rationale for Indicator	Management Objective(s)	Threshold for action / mitigation evaluation	Action to be taken
<p>6. Motor vehicle collisions or reportable incidents that involve Project vehicles on public roads during work hours or Contractor-owned vehicles during off work hours specifying:</p> <ul style="list-style-type: none"> a. total; b. how many involved injuries; and c. how many involved fatalities. 	<ul style="list-style-type: none"> • Traffic • Worker Health 	<p>Driving behaviour Vehicle monitoring Traffic safety</p>	<p>Available data that provides an indication of unsafe driving practices by Project-related vehicles in context of increased traffic volumes. This will provide an indication of effectiveness of traffic safety protocols, which could influence public safety.</p> <p>WAS notes: This indicator will reflect the effectiveness of traffic safety protocols by all workers, including temporary workers residing at camps, which could influence public safety for host community residents.</p>	<p>Minimize Project-related traffic on local roads and Project-related traffic safety incidents.</p>	<p>No minimum threshold; all incidents/accidents investigated</p>	<p>The Contractor must investigate all accidents/incidents that result in, or have the potential to result in, injury or illness, property damage, process/product loss or harm to the environment. Investigative process must include the identification of root causes or causal factors that contributed to the occurrence. The Contractor must determine the necessary corrective actions and report back to Trans Mountain.</p>
<p>7. Total workers transported from staging areas per day (average).</p>	<ul style="list-style-type: none"> • Traffic 	<p>Worker transportation</p>	<p>Provides indication of use of shuttle services to reduce Project-related vehicles on public roadways. Provides indication of Project-workers' vehicles not travelling independently to work sites.</p> <p>WAS notes: It is of benefit to host communities to reduce Project-related traffic and worker vehicles; this applies to all community members, as well as to vulnerable groups such as Aboriginal women and girls specifically in smaller host communities or where camps are located near to Aboriginal communities. While mitigation such as shuttle service for workers are important to reducing traffic incidents and volume/delays, this mitigation is anticipated to also reduce potential for other vehicle-related practices by workers that may affect more vulnerable community members including Aboriginal women and children (e.g., reduce the potential for hitch-hiking).</p>	<p>Minimize Project-related traffic on local roads and Project-related traffic safety incidents.</p>	<p>Number, when calculated as a % of total workers on site (average during the month of the count) is less than 75%</p>	<p>Contractor to evaluate measures to reduce use of Project vehicles. Report to Trans Mountain on any adaptive management measures identified.</p>

TABLE E-1 Cont'd

Indicator	Applicable Monitoring Topic Area	Concern/Issue	Rationale for Indicator	Management Objective(s)	Threshold for action / mitigation evaluation	Action to be taken
8. Personal vehicles in staging area per day (average)	<ul style="list-style-type: none"> Traffic 	Worker transportation	<p>Provides approximate indication of Project-workers' vehicles travelling on public roads at times and number of vehicles not travelling to work sites. It is noted that this will not consider site-inspector vehicles, which are allowed on the work-sites.</p> <p>WAS notes: see above</p>	Minimize Project-related traffic on local roads and Project-related traffic safety incidents.	<p>Number is 10% or more of AADT values at locations nearest to staging yards.</p> <p>and</p> <p>Qualitative feedback received about adverse traffic volume issues via indicators #11 and #12</p>	Contractor to evaluate and identify possible methods to reduce workers use of personal vehicles. Report to Trans Mountain on any adaptive management measures identified.
<p>9. Number of times (by location) a non-local "captive" Project worker (e.g., in camp, on work-site):</p> <p>a) was referred or sent to local health facilities (specifying urgent/non-urgent, and occupational/non-occupational);</p> <p>b) required ambulance or other emergency transport.</p>	<ul style="list-style-type: none"> Worker Health Regional Infrastructure and Services 	Burden on local health and emergency services	<p>Provides an indication of the absolute and relative burden of the non-local workforce on local health services</p> <p>WAS notes: This indicator will provide insight into the extent to which onsite medical services at camps are adequate for supporting the camp residents or if there are emerging issues with respect to worker health or level of health services at camps. Any Project-related burden on local health services may inadvertently affect vulnerable community members who rely on these services.</p>	Minimize Project burden on local health facilities and services	Qualitative feedback from local health authority regarding capacity concerns.	The Contractor must investigate incidents or occurrences that led to a referral to local health authorities or use of ambulance or emergency transport. Investigative process must include the identification of root causes or causal factors that contributed to the medical occurrence itself. The Contractor must determine the necessary corrective actions to limit the need for medical assistance beyond the Project-provided medical services, and report back to Trans Mountain.
10. Number of medical visits to Project onsite medical facilities (occupational vs. non-occupational).	<ul style="list-style-type: none"> Worker Health 	Worker health and potential burden on local health services	<p>Indicator suggested by Northern Health. It demonstrates the success of the Project health and safety protocols by showing the number of workers who are being seen through the Project's private care structure as opposed to placing a burden on the local health care services.</p> <p>WAS notes: see above</p>	Minimize Project burden on local health facilities and services	Number, when calculated as % of average number of workers per month (indicator #1), rises from previous reporting cycle.	The Contractors to evaluate with onsite medical personnel if onsite services need to be adapted. Report to Trans Mountain on any adaptive management measures identified.

TABLE E-1 Cont'd

Indicator	Applicable Monitoring Topic Area	Concern/Issue	Rationale for Indicator	Management Objective(s)	Threshold for action / mitigation evaluation	Action to be taken
<p>11. Number and types of calls/complaints received through TMEP feedback line (by Aboriginal versus non-Aboriginal, by location, by topic), for example:</p> <ul style="list-style-type: none"> • Access limitations • Road closures • Business impacts • Pressure on housing/accommodations • Burden on local services/infrastructure • Dust/air quality • Noise/Sensory Disturbance • Pollution/emissions • Other environmental concerns • Traffic and driving • Worker conduct • Compliments/positive feedback • Traditional Land and Resource Use/Traditional Marine Resource Use and cultural sites 	<ul style="list-style-type: none"> • Traffic • Worker Accommodation • Worker Health • Human Occupancy and Resource Use (including marine-related) • Sensory Disturbance • Emergency Management Planning • Regional Infrastructure and Services • Navigation and Navigation Safety • Aboriginal and non-Aboriginal Community Way-of-Life 	<p>Any</p>	<p>Provides direct indication of issues/concerns /perceptions related to socio-economic effects of Project construction, on an Aboriginal and non-Aboriginal basis.</p> <p>WAS notes: This indicator will reflect any unique construction effect themes that may emerge in communities hosting or near to TMEP camps with respect to worker conduct, on or off duty, or presence of camps, including social impacts related to inappropriate worker conduct with respect to local women including Aboriginal women and girls.</p>	<p>Minimize and respond to grievances related to adverse socio-economic effects related to Project construction.</p>	<p>All grievances will be responded to (no minimum threshold).</p>	<p>Trans Mountain will ensure all inquiries and complaints receive timely complaint resolution and response proportional to level of urgency. Track resolution, or rationale for non-completion, including any adaptive management measures identified.</p>

TABLE E-1 Cont'd

Indicator	Applicable Monitoring Topic Area	Concern/Issue	Rationale for Indicator	Management Objective(s)	Threshold for action / mitigation evaluation	Action to be taken
12. Qualitative feedback themes about community concerns and experienced social effects	<ul style="list-style-type: none"> Traffic Worker Accommodation Worker Health Human Occupancy and Resource Use Sensory Disturbance Emergency Management Planning Regional Infrastructure and Services Navigation and Navigation Safety Community Way-of-Life 	Any	<p>Provides indication of community concerns and experienced social effects, as reported by community members.</p> <p>WAS notes: This indicator will reflect any unique social effect themes that may emerge in communities near to TMEP camps or hosting temporary workers with respect to inappropriate worker conduct, including impacts related to local women or specifically Aboriginal women and girls.</p> <p>The Aboriginal Engagement Roundtables will be one of the engagement mechanisms and opportunities used to identify and explore qualitative feedback themes related to work camps that may specifically affect Aboriginal social and cultural well-being, including social effects of work camps on Aboriginal women and girls.</p>	Ensure ongoing consultation with affected stakeholders; ensure opportunity to understand experienced social effects during construction	Adverse socio-economic issue or concern from appropriate government authority or service provider or community organization	Contractor discuss and evaluate the cause of the adverse issue with the stakeholder to identify any Project-specific corrective measures. Report back to Trans Mountain.
13. Qualitative feedback themes about effects on the quality and abundance of traditional harvesting resources, or ability of Aboriginal people to harvest resources, within the Project footprint	<ul style="list-style-type: none"> Aboriginal social and cultural wellbeing 	Disruption to Aboriginal cultural practices and places	<p>Provides indication of community concerns and experienced Aboriginal-specific social and cultural wellbeing effects, as reported by Aboriginal groups.</p> <p>WAS notes: This indicator is specific to effects on traditional harvesting resources; however as noted above, any unique social effect themes that may emerge in communities near to TMEP camps or hosting temporary workers with respect to worker off-duty conduct, including impacts related to worker conduct or unique to Aboriginal women and girls, will be captured via indicator #12.</p>	Minimize disruption and disturbance to traditional harvesting and Aboriginal cultural practices	Qualitative feedback from Aboriginal group leader/administrator regarding reports of adverse effects on quality and abundance of traditional harvesting resources, or ability of Aboriginal people to harvest their resources or access cultural sites, within the Project footprint	Contractor to evaluate the circumstances, with input from the Aboriginal Field Advisor and Aboriginal Monitor as required. Report back to Trans Mountain.

TABLE E-1 Cont'd

Indicator	Applicable Monitoring Topic Area	Concern/Issue	Rationale for Indicator	Management Objective(s)	Threshold for action / mitigation evaluation	Action to be taken
14. Number of people affected by a notifiable disease ⁵ in a work camp	<ul style="list-style-type: none"> Worker health Regional infrastructure and services 	Worker health and burden on local health services	<p>Provides an indication of extent to which presence of camp and temporary workers are contributing to infectious disease outcomes in communities. Indication of Project contribution to community health outcomes and burden on local health services.</p> <p>WAS notes: This indicator reflects the extent to which presence of camps and temporary workers are contributing to infectious disease outcomes in communities. It will help understand mitigation effectiveness with respect to worker wellness protocols within the camp population. Effective disease control amongst workers in camps is key to ensuring the Project does not contribute to disease outbreaks in host communities which in turn may have potential for health effects in community members that are more vulnerable to infectious diseases.</p>	<p>Minimize Project burden on local health facilities and services.</p> <p>Minimize Project-related community health impacts associated with disease transmission.</p>	No minimum threshold; all notifiable diseases reported to the local health authority	All notifiable diseases presenting to the medical facility in a camp or at the worksite will be reported to the appropriate local health authority. Contractor to have follow-up discussion with the health authority about containment and actions to be taken. Provide report back to Trans Mountain.

- Notes:**
- "Workers" include TMEP direct employees, Contractors and sub-contractors. It does not include existing TMPL operations workers.
 - Aboriginal status:** self-identified by the worker.
 - Local:** Municipalities, counties or regional districts that are crossed by the Project Footprint. The Footprint of the Project is defined as the area directly disturbed by surveying, construction and clean-up of the pipeline and associated physical works and activities (including, where appropriate, the permanent right-of-way, pump stations, terminals, Westridge Marine Terminal, temporary construction workspace, temporary stockpile sites, temporary staging sites, camps, access routes, and power lines).
Regional: Municipalities, counties or regional districts that are not crossed by the Project Footprint, but that are within the Socio-economic RSA as defined in the Application (see Section 5.0 of Volume 5B), and thus could be a source of labour or services within reasonable commuting distance from the Project.
 - Living out allowance refers to payment or reimbursement to non-local/regional, non-camp workers to cover travel expenses such as accommodation, meals and incidentals. Related stipends may also be considered and monitored depending on level of camp services, for example per-diem for camp residents to cover cost of incidentals.
 - Notifiable diseases are infectious respiratory, gastrointestinal or sexually transmitted diseases (e.g., measles, meningitis, salmonella, e.coli.), where occurrences are required to be reported to health authorities in order to limit their transmission in the community.

In summary, there are six SEEMP indicators that will be central to identifying and managing potential social impacts of worker camps, which are summarized in Table E-2.

TABLE E-2

PROJECT-SPECIFIC MONITORING INDICATORS KEY TO SOCIAL IMPACTS OF WORKER CAMPS

SEEMP Indicator	Rationale Specific to Social Impacts of Worker Camps and Mobile Workers
2. Number of worker-days (by location) related to construction in field communities categorized by accommodation arrangements: <ul style="list-style-type: none"> • Non-local, staying in TMEP camps • Non-local, not staying in TMEP camps • Local or regional residing at home 	This indicator reflects the scale of the temporary workforce and Aboriginal make-up of the workforce – both residing in and out of camps - which may interface with the host community residents. This provides an indication of the possibility for social impacts related to temporary workers and work camps when considered in the context of the local and regional population.
7. Total workers transported from staging areas per day (average).	While mitigation such as shuttle service for workers are important to reducing traffic incidents and volume/delays, this mitigation is anticipated to also reduce potential for other vehicle-related practices by workers that may affect more vulnerable community members including Aboriginal women and children (e.g., reduce the potential for hitch-hiking).
9. Number of times (by location) a non-local “captive” Project worker (e.g., in camp, on work-site): <ol style="list-style-type: none"> a) was referred or sent to local health facilities (specifying urgent/non-urgent, and occupational/non-occupational); b) required ambulance or other emergency transport. 	This indicator will provide insight into the extent to which onsite medical services at camps are adequate for supporting the camp residents or if there are emerging issues with respect to worker health or level of health services at camps. Any Project-related burden on local health services may inadvertently affect vulnerable community members who rely on these services.
11. Number and types of calls/complaints received through TMEP feedback line (by Aboriginal versus non-Aboriginal, by location), by socio-economic topic.	This indicator will reflect any unique effect themes that may emerge in communities hosting or near to TMEP camps with respect to worker off-duty conduct or presence of camps, including social impacts related to inappropriate worker conduct with respect to local women including Indigenous women and girls.
12. Qualitative feedback themes about community concerns and experienced social effects	This indicator will reflect any unique social effect themes that may emerge in communities near to TMEP camps or hosting temporary workers with respect to inappropriate worker conduct, including impacts related to local women or specifically Aboriginal women and girls. The Aboriginal Engagement Roundtables will be one of the engagement mechanisms and opportunities to identify and explore qualitative feedback themes related to work camps that may specifically affect Aboriginal social and cultural well-being, including social effects of work camps related to Aboriginal women and girls.
14. Number of people affected by a notifiable disease ⁵ in a work camp	This indicator reflects the extent to which the presence of camps and temporary workers are contributing to infectious disease outcomes in communities. It will help understand mitigation effectiveness with respect to worker wellness protocols within the camp population. Effective disease control amongst workers in camps is key to ensuring the Project does not contribute to disease outbreaks in host communities which in turn may have potential for health effects in community members that are more vulnerable to infectious diseases.