

<b>Project Name</b>	Woodfibre LNG Project	<b>Inspection Status</b>	Final
<b>EA Certificate #</b>	E15-02	<b>Inspection No.</b>	20250054_IR001
<b>Project Status</b>	Certified - construction	<b>Inspection Start</b>	2025-08-27
<b>Inspection Type</b>	Field and Administrative	<b>Initiation</b>	Planned Inspection
<b>UTM</b>	10U 481915E 5501445N		
<b>Project Description</b>	The Woodfibre LNG Project (Project) is a liquefied natural gas export facility that will have a storage capacity of 250,000 cubic metres and production capacity of up to 2.1 million tonnes per year of liquefied natural gas, currently under construction.		
<b>Location Description</b>	The Project is located on the previous Woodfibre Pulp and Paper Mill site located approximately seven kilometres west-southwest of the urban centre of Squamish, British Columbia.		
<b>Inspection Summary</b>	<p>On August 27, 2025, the Environmental Assessment Office (EAO) Compliance and Enforcement Branch (CEB) conducted a field inspection of the Project to verify compliance against EAC E15-02. The inspection also includes an administrative component which was initiated on August 6, 2025. The Project was in Construction at the time of the inspection. The EAO CEB provided an on-site post inspection debrief to Project representatives on August 27, 2025, at 1400.</p> <p>The following requirements were inspected against:</p> <ol style="list-style-type: none"> <li>1. Condition 6 with respect to in water work silt control measures;</li> <li>2. Condition 8 with respect to in water work timing and approval from Squamish Nation, Tsleil-Waututh Nation, and Fisheries and Oceans Canada;</li> <li>3. Condition 8 with respect to salvage of non-mobile and less mobile fish species;</li> <li>4. Condition 8 with respect to monitoring of juvenile salmonids;</li> <li>5. Condition 9 with respect to stationed Marine Mammal Observers.</li> </ol> <p>On November 17, 2025, the EAO CEB issued the inspection record to the Certificate Holder. On November 27, 2025, the Certificate provided comments pertaining to the inspection record. These comments were reviewed, and edits were made to the record by the EAO CEB to correct identified errors of fact or omission.</p> <p>Additional details regarding these findings may be found in the sections below.</p> <p>The compliance findings in this report reflect the analysis based on the information obtained during the inspection commenced on the date noted above. These findings can change at any time upon information gathered through future inspections or if new information is obtained by the EAO CEB.</p>		
<b>In Attendance</b>	Compliance Manager – Woodfibre LNG Environmental Manager- Woodfibre LNG Permitting Manager- Woodfibre LNG Environmental Monitor - Squamish Nation Indigenous Monitor Program Manager- Squamish Nation		

<b>Certificate Holder</b>	Woodfibre LNG
<b>Mailing Address</b>	Woodfibre LNG General Partner Inc
<b>Inspecting Officer(s)</b>	Shayla Frechette Senior Compliance & Enforcement Officer
<b>Record Prepared By:</b>	Shayla Frechette Senior Compliance & Enforcement Officer
<b>Record Approved By</b>	Chris Parks Deputy Director, Compliance & Enforcement

**INSPECTION DETAILS**

**Requirement 1: Condition 6 of the EAC requires a Marine Staḱw (Water) Quality Management and ínexwantas (Monitoring) Plan for Construction**

The Holder must develop, in consultation with MOE, MOH, DFO, OGC, VCH and Aboriginal Groups, a marine water quality management and monitoring plan for Construction. The Holder must implement the plan to the satisfaction of EAO.

*\*This is an expert of Condition 6.*

**Marine Staḱw (Water) Quality Management and ínexwantas (Monitoring) Plan for Construction (October 2023)**

**7.2 General Marine Works Management and Timing Windows**

Silt control measures will be installed within marine staḱw (waters) around in-staḱw (water) construction activities (such as dredging and excavation activities along the shoreline) with the potential to adversely affect staḱw (water) quality (i.e., to contain suspended sediment).

*\*This is an expect from the Marine Staḱw (Water) Quality Management and ínexwantas (Monitoring) Plan for Construction.*

**Inspection Details:**

During the inspection, the EAO CEB observed silt control measures had been installed in the water adjacent to in water construction areas, including locations of riprap removal along the shoreline (Photo 1). The installed measures appeared to be functioning effectively at the time of the inspection.

The observations indicate that appropriate silt control measures have been properly implemented. These findings demonstrate compliance with the applicable environmental protection and sediment control requirements.



Photo 1: Yellow silt control booms located next to rip rap removal activities.

<b>Compliance Finding</b>	In
<b>Enforcement Action</b>	Not Applicable

**Requirement 2: Condition 8 of the EAC requires a Marine Fish and Fish Habitat Management and Monitoring Plan**

The Holder must develop, in consultation with DFO and Aboriginal Groups, a marine fish and fish habitat management and monitoring plan. A Qualified Professional must develop the plan and supervise the implementation of the plan. The Holder must implement the plan to the satisfaction of EAO.

*\*This is an expert of Condition 8.*

**Marine Fish and Fish Habitat Management and Monitoring Plan (August 2023)**

**7.3 General Marine Works Management and Timing Windows**

If in-water works are required to be completed outside of the timing window of least risk, the work will be reviewed by a QEP and supplemental mitigation will be developed and agreed to with Squamish Nation, Tsleil-Waututh Nation, and Fisheries and Oceans Canada prior to executing any in-water works outside to the timing window of least risk.

*\*This is an expert from the Marine Fish and Fish Habitat Management and Monitoring Plan.*

**Inspection Details:**

On August 6, 2025, the EAO CEB requested the Certificate Holder to provide documentation outlining the Qualified Environmental Professional’s (QEP) supplemental mitigation measures implemented for in-water works conducted between July 15 and July 31, 2025—activities that occurred outside of the approved fisheries timing window. In addition, the EAO CEB requested evidence of approval or consent for these measures from the Squamish Nation, Tsleil-Waututh Nation (TWN), and Fisheries and Oceans Canada (DFO).

On August 13, 2025, the Certificate Holder responded, stating:

*“The Keystone Environmental Ltd. Supplemental Aquatic Effects Assessment (SAEA) for limited construction activities outside of the marine least risk window is provided in the link above. The Squamish Nation letter of*

*consent to the requested amendment contained in the SAEA submitted to DFO is provided in the link above. Woodfibre LNG did not seek approval from Tsleil-Waututh Nation as the SAEA was developed directly with Squamish Nation. Section 3 of the SAEA outlines the engagement completed with Tsleil-Waututh Nation and other Indigenous Groups through the development of the application. The DFO letter and reissuance of authorization 22-HPAC-01346 is provided in the link above.”*

*On November 27, 2025, the Certificate Holder stated “Tsleil-Waututh Nation was consulted with on this work in multiple meetings from March to August 2025 and had the opportunity to, but did not, raise concerns with moving forward with this work. As is our routine protocol with Tsleil-Waututh Nation, the absence of expressed concern indicates agreement and our ability to move forward. Following the receipt of the Inspection Record WOOLNG\_20250054\_IR001, Woodfibre LNG sought, and received, verbal confirmation from the Tsleil-Waututh Nation concerning this protocol. This confirmation was received from the Tsleil-Waututh Nation through a regularly scheduled interface meeting on November 20, 2025.”*

On December 10, 2025, the EAO CEB received confirmation from Tsleil-Waututh Nation that the Certificate Holder’s description of consultation protocols and interactions was accurate.

Based on the information provided, the EAO CEB determined that there is evidence of compliance related to the implementation of supplemental mitigation measures for in-water works conducted outside the approved timing window.

<b>Compliance Finding</b>	In
<b>Enforcement Action</b>	Not Applicable

**Requirement 3: Condition 8 of the EAC requires a Marine Fish and Fish Habitat Management and Monitoring Plan**

The Holder must develop, in consultation with DFO and Aboriginal Groups, a marine fish and fish habitat management and monitoring plan. A Qualified Professional must develop the plan and supervise the implementation of the plan. The Holder must implement the plan to the satisfaction of EAO.

*\*This is an expert of Condition 8.*

**Marine Fish and Fish Habitat Management and Monitoring Plan (August 2023)**

**7.3 General Marine Works Management and Timing Windows**

Salvage of non-mobile and less mobile sts’úkwí7 (fish) species (e.g., starfish, sea urchins, crabs) will be completed in the intertidal by the Environmental Monitor, or in the subtidal by an approved dive team prior to the commencement of marine Construction activities such as infilling/dewatering, dredging or marine blasting activities

*\*This is an expert from the Marine Fish and Fish Habitat Management and Monitoring Plan.*

**Inspection Details:**

On August 6, 2025, the EAO CEB requested the Certificate Holder to provide records of salvage activities for non-mobile and less mobile sts’úkwí7 (fish) species between July 15 and July 31, 2025.

On August 13, 2025, the Certificate Holder provided the following response: *“No marine salvage activities were conducted until August 1, 2025, as all construction activities took place within the M07/14 casing pile and remained isolated from the surrounding marine environment. The ROE Environmental Inc. Weekly Wildlife Monitoring Report #70 for the period July 27 to August 2, 2025, includes records of salvage activities under the section titled “Marine Life Management Summary” which is provided in the link above. On August 1, 2025, the marine contractor completed pile drilling within the M07/14 casing and planned to unbolt and remove the casing and therefore a marine salvage was conducted prior to this activity commencing.”*

The Marine Life Management Summary section of the Weekly Wildlife Monitoring Report noted one molted Sea Star on August 1, 2025. Additionally, the summary provided the following notes: *“Salvage of marine invertebrates*

around M7/14 pile. Divers examined the pile and area around. One mottled sea star was salvaged and relocated to an appropriate release site.”

The information and evidence provided by the Certificate Holder provides evidence of compliance with respect to salvage of non-mobile and less mobile sts’úkwi7 (fish) species.

<b>Compliance Finding</b>	In
<b>Enforcement Action</b>	Not Applicable

**Requirement 4: Condition 8 of the EAC requires a Marine Fish and Fish Habitat Management and Monitoring Plan**

The Holder must develop, in consultation with DFO and Aboriginal Groups, a marine fish and fish habitat management and monitoring plan. A Qualified Professional must develop the plan and supervise the implementation of the plan. The Holder must implement the plan to the satisfaction of EAO.

*\*This is an expert of Condition 8.*

**Marine Fish and Fish Habitat Management and Monitoring Plan (August 2023)**

**7.3 General Marine Works Management and Timing Windows**

**7.3.4 Juvenile Salmonid Protection Measures**

During in-water works when juvenile salmonids may be present (approximately February 1 to August 15) the environmental monitor will record daily observations of juvenile salmon. Since juvenile salmon may not always be visible from the surface (e.g., due to rainfall or windy conditions) an underwater camera (e.g., drop camera) will be utilized to look for juvenile salmon in addition to observations from above the water surface.

*\*This is an expert from the Marine Fish and Fish Habitat Management and Monitoring Plan.*

**Inspection Details:**

On August 6, 2025, the EAO CEB requested the Certificate Holder to provide records of daily juvenile salmon observations and evidence of underwater camera use for the period of July 15 to July 31, 2025.

On August 13, 2025, the Certificate Holder submitted three Weekly Marine Mammal Observation and Hydroacoustic Monitoring Reports covering the period between July 27 and August 2, 2025, along with the following response:

*“The ROE Environmental Inc. Weekly Marine Mammal Observation and Hydroacoustic Monitoring Reports (Reports) include records of daily pre-work fish scans using SONAR to identify high-density presence of fish, including juvenile salmonids, and are included for the period requested in the link above. Sea-surface turbidity within Howe Sound, which is naturally influenced by turbid Squamish River discharge, was prohibitive for visual detection (underwater camera use) of juvenile salmonids over the period requested.”*

Upon review, the Reports indicated that “Pre-work SONAR scan for fish presence in work area conducted” had occurred; however, no records of visual observations—either above or below the water surface—were provided. Additionally, the Certificate Holder did not provide documentation demonstrating that adaptive management measures were implemented or approved to account for the change in monitoring methodology.

During the EAO CEB field inspection on August 27, 2025, Project Representatives confirmed that the SONAR equipment identifies areas of high fish density but does not verify species.

Based on the information provided, the EAO CEB determined that there is evidence of non-compliance with respect to the requirement for maintaining daily visual observation records of juvenile salmon.

<b>Compliance Finding</b>	Out
<b>Enforcement Action</b>	Notice of Non-compliance

**Requirement 5: Condition 9 of the EAC requires a Marine Mammals Plan**

A Qualified Professional must develop the plan and supervise the implementation of the plan. The Holder must provide the plan to EAO no less than 60 days prior to the Holder’s planned date to commence Construction in the marine environment. The Holder must provide the plan to EAO, DFO, OGC and Aboriginal Groups no less than 30 days prior to the Holder’s planned date to commence Construction in the marine environment. The Holder must implement the plan to the satisfaction of EAO.

*\*This is an expert of Condition 9.*

**Marine Mammals Plan (MMP) (August 2023)**

**5.2 General Mitigation Measures**

**Table 5: Mitigation Measures for Marine Mammals During Construction and Operations- General**

Stations may be located on land, a small vessel, or on a barge in proximity to the noise-producing activity being monitored. A minimum of 3 boats will be used at the outset of inewxantas (monitoring) to allow coverage of the entire exclusion zone; this may be modified, as required, following in-field hydrophone verification

*\*This is an expert from the MMP.*

**Inspection Details:**

During the field inspection on August 27, 2025, the EAO CEB observed three small vessels positioned outside the established exclusion zone. Two vessels were stationary, while the third operated as a rover to support ongoing monitoring activities as well as hydrophone monitoring, all of which were identifiable with a small orange flag (Photo 2).

The EAO CEB also spoke with two Marine Mammal Observers (MMO’s) stationed near Mooring Structure One. The MMOs confirmed that a 30-minute pre-work scan for marine mammals is conducted prior to the commencement of any in-water works each day from both land and water.

Based on the information provided by the MMOs and the observations made during the inspection, the EAO CEB determined that the Project was in compliance with the requirements related to marine mammal monitoring at the time of inspection.



Photo 2: Marine Mammal Observer vessels.

<b>Compliance Finding</b>	In
<b>Enforcement Action</b>	Not Applicable

<b>Actions Required by Certificate Holder and Additional Comments</b>
None at this time.
<b>Enforcement Summary</b>
<b>WOODFIBRE LNG IS NOT COMPLIANT WITH CONDITION #8 OF EAC# E15-02. WOODFIRE LNG HAS BEEN ISSUED A NOTICE OF NON-COMPLIANCE. SEE REQUIREMENTS 4 FOR FURTHER INFORMATION.</b>
<b>Regulatory Considerations</b>
None at this time.
<b>Inspection Record Version Dates</b>
<b>Date Preliminary</b>
Not applicable.
<b>Date Finalized</b>
<b>2025-12-19</b>
<b>Environmental Assessment Office - Compliance &amp; Enforcement Branch</b>

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