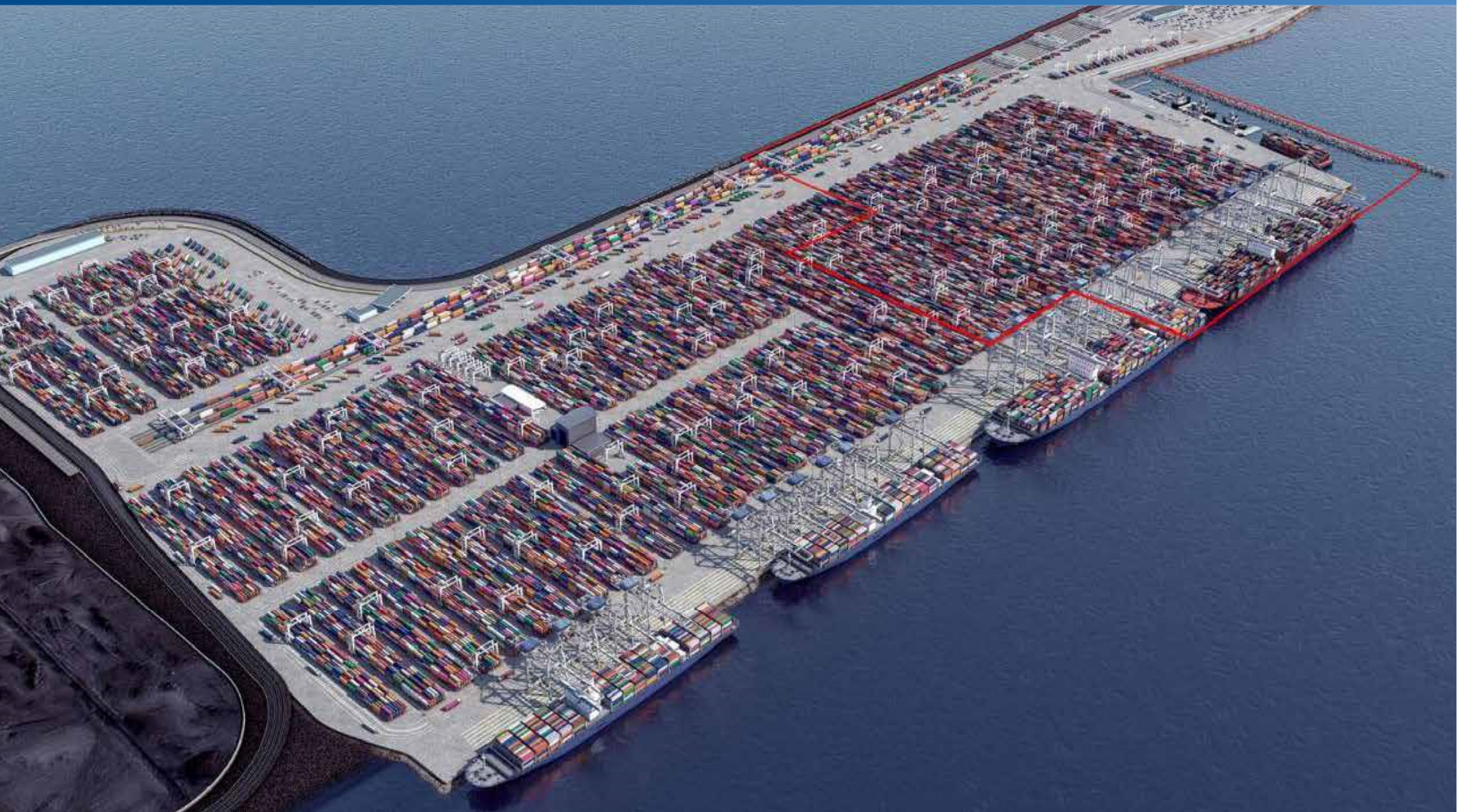


# GLOBAL CONTAINER TERMINALS DELTAPORT EXPANSION BERTH FOUR PROJECT (DP4)



## Detailed Project Description

JULY 2021

Submission to the BC Environmental Assessment Office



Submitted by GCT with expert input provided from its advisors

## ACRONYMS AND ABBREVIATIONS

ACRONYM/ ABBREVIATION	DEFINITION
ALR	Agricultural Land Reserve
AIA	Archaeological Impact Assessment
AOA	Archaeological Overview Assessment
BC	British Columbia
BCEAA	British Columbia Environmental Assessment Act
BCEAO	British Columbia Environmental Assessment Office
BCI	British Columbia Investment Management Corporation
BNSF	Burlington Northern and Santa Fe
CAC	Criteria Air Contaminants
CAGR	Compound Annual Growth Rate
CEBP	Coastal Environmental Baseline Program
CHE	Container Handling Equipment
CNA	Cowichan Nation Alliance
DFO	Fisheries and Oceans Canada
DP3	Deltaport Third Berth Project
DP4	GCT Deltaport Expansion, Berth Four Project (the Project)
DPD	Detailed Project Description
DPW	Dubai Ports World
DWT	Deadweight tonnage
ECCC	Environment and Climate Change Canada
ECHO Program	Enhancing Cetacean Habitat and Observation Program
EMS	Environmental Management System
EMSP	Environmental Management System Procedures
EOP	Environmental Operating Procedures
ESG	Environmental, Social and Governance
FLNRORD	BC Ministry of Forests, Lands, Natural Resource Operations and Rural Development
FPIC	Free Prior and Informed Consent
FREMP	Fraser River Estuary Management Plan
FTE	Full Time Equivalent
FSC	Food, Social and Ceremonial
GBA+	Gender-Based Analysis Plus
GCT	Global Container Terminals Canada Limited Partnership

ACRONYM/ ABBREVIATION	DEFINITION
GCT Deltaport	Global Container Terminals Deltaport Container Terminal
GDP	Gross Domestic Product
GHG	Greenhouse Gas
IAA	Impact Assessment Act
IAAC	Impact Assessment Agency of Canada
IBA	Important Bird Area
IFM	IFM Investors
IK	Indigenous Knowledge
ILWU	International Longshore and Warehouse Union
IPD	Initial Project Description
ISC	Indigenous Services Canada
Joint Guidelines	Tailored Impact Statement Guidelines/ Application Information Requirements
LED	Light-Emitting Diode
MOU	Memorandum of Understanding
OPP	Oceans Protection Plan
OTPP	Ontario Teachers' Pension Plan Board
PID	Property Identifier
PIN	Participating Indigenous Nation
RBRC	Roberts Bank Rail Corridor
RBTA	Roberts Bank Trade Area
RBT2	Roberts Bank Terminal 2 Project
RMG	Rail Mounted Gantry Cranes
RTG	Rubber Tired Gantry Cranes
SSIGA	Salish Sea Indigenous Guardians Association
SRKW	Southern Resident Killer Whale
SSI	Salish Sea Initiative
TLU	Traditional Land Use
TMX	Trans-Mountain Expansion Project
ULCV	Ultra Large Container Vessel
UNDRIP	United Nations Declaration on the Rights of Indigenous Peoples
USA	United States of America
VCs	Valued Components
VFPA	Vancouver Fraser Port Authority
WCMRC	Western Canada Marine Response Corporation
WMA	Wildlife Management Area (Provincial)

## SYMBOLS AND UNITS OF MEASURE

SYMBOL/UNIT OF MEASURE	DEFINITION
%	percent
cm	centimetre
CAD	Canadian Dollars
ha	hectare
km	kilometre
km <sup>2</sup>	square kilometre
m	metre
m <sup>2</sup>	square metre
TEU	twenty-foot equivalent unit

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- Appendix B BCEAO Concordance Table for Detailed Project Description Requirements
- Appendix C Responses to Summary of Issues
- Appendix D Species at Risk
- Appendix E Greenhouse Gases Memo

# 1 INTRODUCTION

## 1.1 Project Status and History

The Deltaport Expansion, Berth Four Project (DP4 or the Project) is being proposed by Global Container Terminals Canada Limited Partnership (GCT), the long-term operator of GCT Deltaport Terminal. As proposed, DP4 is an expansion to the existing marine terminal primarily on federal lands in Delta, British Columbia (BC). Project construction and operation activities may also overlap Tsawwassen First Nation and Government of BC water lots.

The Project involves the expansion of the existing terminal container storage and handling area, the addition of a fourth berth on the east side of the Roberts Bank Causeway, the expansion of the existing Intermodal rail yard, and the relocation of several buildings and related services. The Project will require dredging to provide safe access for ships, and the relocation of the existing tug basin to the north end of the new berth four area. Consideration is also being given to a new short sea shipping berth in response to government initiatives and potential business feasibility of distributing currently trucked goods in containers via barge services. If it is determined that short sea shipping capability is not required, the terminal footprint will remain unchanged as the area currently identified as being required for a short sea shipping berth would be used for terminal operations, such as container storage and/or the (un)loading of container trucks, however, the area of dredging may be reduced. In addition, a proposed new marina for fishing and crabbing vessels is being considered as a mitigation measure, in response to feedback from Tsawwassen First Nation (Figure 1).

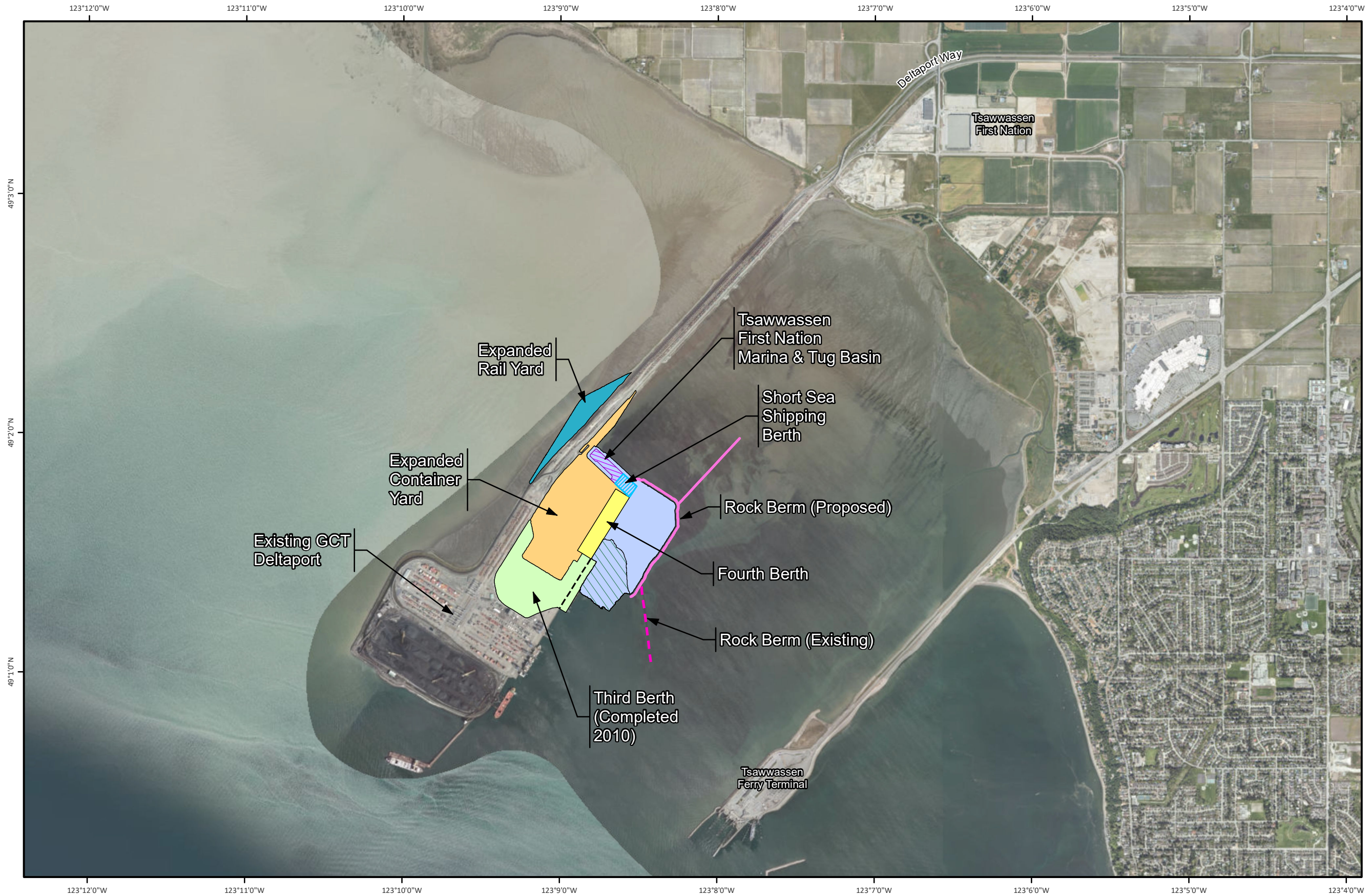
GCT currently holds all required permits, tenures, and approvals to operate at the GCT Deltaport Terminal. A federal impact assessment and/or provincial environmental assessment may be required prior to securing any additional permits or approvals necessary to advance DP4. The Project has not been previously assessed by the provincial or federal governments. Currently, this Project is subject to a coordinated approach by the federal Impact Assessment Agency of Canada (IAAC) and the British Columbia Environmental Assessment Office (BCEAO) to align their respective process. Based on this approach, the term “Impact Assessment” will be applied henceforth to describe both the impact assessment and the environmental assessment processes for the Project.

The Project is intended to be funded entirely by GCT and private investment and operated by GCT thereby ensuring that the assessment, approval, funding, development, and operation of the Project are fully integrated.

The Initial Project Description (IPD) was completed by GCT and submitted to the IAAC and BCEAO on September 18, 2020. The IPD was published on the Canadian Impact Assessment Registry and the BCEAO EPIC website, and a public engagement period on this document was held from October 13 to November 27, 2020. On December 23, 2020, the agencies issued a Joint Summary of Issues and Engagement document (JSOIE) to GCT which reflected the comments received by the IAAC during the public engagement period and provided an outline of the key issues specific to the Project. The Early Engagement Plan for the Project was also completed by GCT and submitted to BCEAO and published on their provincial registry on September 28, 2020.

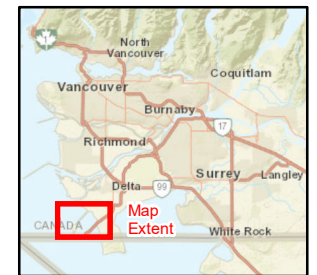
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Figure 1: GCT Deltaport Expansion, Berth Four Project Area.



- Legend**
- Third Berth
  - Fourth Berth
  - Expanded Container Yard
  - Expanded Rail Yard
  - Fourth Berth Dredge Area
  - Existing Third Berth Dredged Area
  - Marina and Tug Basin
  - Short Sea Shipping Berth
  - Rock Berm (Existing)
  - Rock Berm (Proposed)

National Topographic System (NTS) map number: 092G03



0 200 400 600 800 m  
Scale: 1:30,000

Projection: NAD 1983 UTM Zone 10N

Data Sources:  
a) Project area and components, Ausenco 2021.  
b) GeoEye-1 50 cm, 17 July 2018, Esri Online Service.



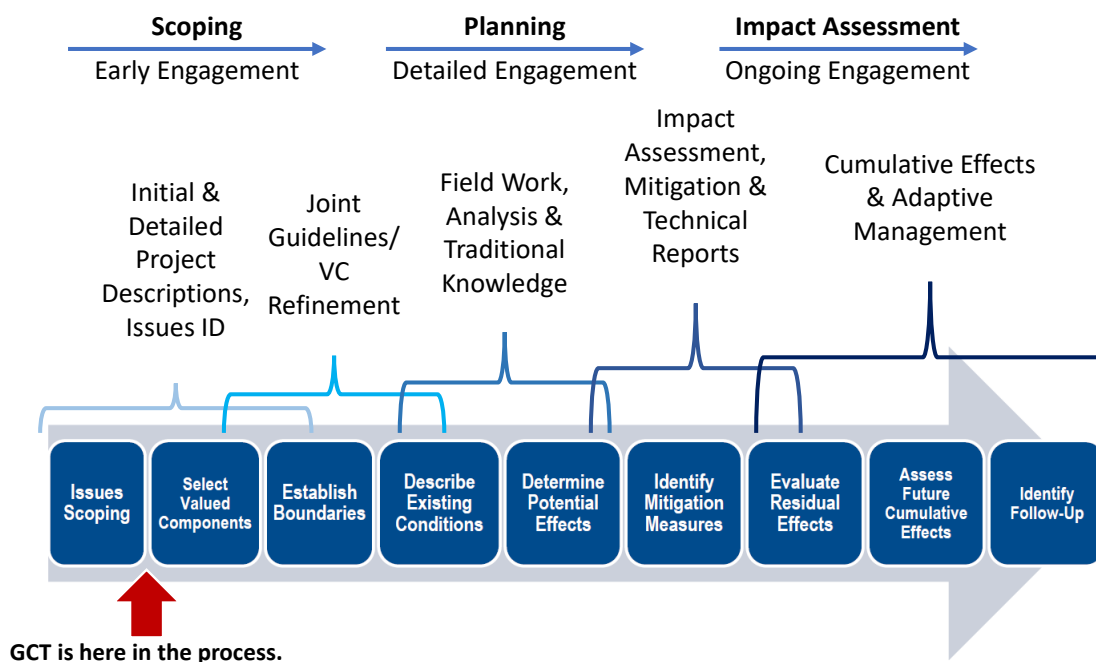
This Detailed Project Description (DPD) builds on the information provided in the IPD, with updates, revisions and further details reflecting ongoing engagement with Indigenous nations, the public, municipalities, provincial and federal government agencies and stakeholders. It also describes how engagement contributed to the changes to the Project and provides GCT's responses to the issues identified in the JSOIE document. The DPD was prepared in accordance with the IAAC's Information and Management of Time Limits Regulations under the *Impact Assessment Act* (IAA 2019) and the BCEAO's Early Engagement Policy guidance. The inclusion of such information in this DPD represents preliminary project design information and is subject to further studies and design as the Project progresses through the review process. A table of concordance documenting compliance with IAAC and BCEAO information requirements is provided in Appendix A and Appendix B respectively.

Following the filing of the DPD, the BCEAO will enter into the consensus-seeking phase with Participating Indigenous Nations (PIN) before making a recommendation regarding the Project's Readiness Decision. The Readiness Decision is a recommendation by the Chief Executive Assessment Officer on whether or not the Project should proceed to an assessment that evaluates the effects of the Project. Under the IAA, a determination will also be made as to whether an impact assessment is required after acceptance of the DPD.

The Project is currently in the Early Engagement Phase and with the DPD submission and subsequent outcome of the Readiness Decision, the Project will move into the Process Planning Phase with the BCEAO, dependent on Readiness Decision. The Project will also continue through the Planning Phase dependent on the IAAC determination (hereinafter the BCEAO Process Planning and the IAAC Planning Phase will collectively be referred to as Planning Phase). These phases will establish the scope, procedures, and methods for the Impact Assessment. The Project is jointly regulated by the BCEAO and IAAC and as a result, the requirements of these agencies will be included in the Tailored Impact Statement Guidelines/Application Information Requirements document (Joint Guidelines) for the Project. Figure 2 is a modification of BCEAO's figure in the User Guide to show where GCT is currently at in the assessment process and highlighting the ongoing and additional opportunities for input and feedback.

In anticipation of the Planning Phase, GCT is currently engaging with Indigenous nations and government agencies and authorities to inform the Impact Assessment approach (to be defined in the Joint Guidelines by the BCEAO and IAAC). A first draft of the Joint Guidelines was prepared by GCT and submitted to IAAC and BCEAO who will further tailor the document to DP4 and consult on it with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuance of the final Joint Guidelines to GCT. The Joint Guidelines will specify the scope, procedures, and methods for the Impact Assessment. Requirements will be fulfilled by GCT in the Impact Statement/Application to be submitted in early 2023. Engagement with interested parties, Indigenous nations and Regulatory Authorities will continue throughout the development of the Impact Statement/Application.

**Figure 2: Project Effects Assessment Process<sup>1</sup>.**



## 1.2 Proponent Information

GCT, a majority Canadian-owned and operated company with headquarters in Vancouver, has operated on the west coast of Canada since 1907. Under long-term leases, GCT is responsible for operating both GCT Vanterm and GCT Deltaport which first opened in 1997 as a two-berth container terminal operating on Pod 4 at the site. Increased volume subsequently necessitated expansion to Pod 3 in 2003, and the development of the GCT Deltaport Third Berth (DP3) on Pod 5 opening in 2010. These two state-of-the-art west coast container terminals provide customers and carriers with reliable and convenient access to all major Asia-Pacific trade lanes and are representative of GCT’s considerable involvement in the development and operation of Canada’s Asia-Pacific Gateway.

GCT’s two East Coast United States of America (USA) facilities, GCT Bayonne (formerly Global Terminal & Container Services) and GCT New York (formerly New York Container Terminal) were established in 1972 and 1995, respectively.

Since 1997, GCT has remained a long-term Canadian port infrastructure investor with a history of completed investments for the Third Berth Expansion Project (CAD 180 million) and the 2018 Yard Expansion and Densification Project (CAD 300 million). GCT is also actively investing in GCT Vanterm (CAD 160 million) and the DP4 Project will represent a key future investment in Canadian port infrastructure (GCT 2019).

<sup>1</sup> Figure modified from Figure 3 (The effects assessment steps), BCEAO – Effects Assessment Policy Version 1.0 ([https://www2.gov.bc.ca/assets/gov/environment/natural-resource-stewardship/environmental-assessments/guidance-documents/2018-act/effects\\_assessment\\_policy\\_v1\\_-\\_april\\_2020.pdf](https://www2.gov.bc.ca/assets/gov/environment/natural-resource-stewardship/environmental-assessments/guidance-documents/2018-act/effects_assessment_policy_v1_-_april_2020.pdf)).

GCT has three major pension fund investors: British Columbia Investment Management Corporation (BCI); Ontario Teachers’ Pension Plan Board (OTPP) and IFM Investors (IFM), which support nearly one million Canadian public sector employees and retirees. With a combined portfolio value of CAD 361 billion, our shareholders are long-term, experienced infrastructure investors committed to GCT and the overall growth and servicing of Canada’s marine shipping sector.

All three of GCT’s shareholders are signatories to the United Nations Principles for Responsible Investment (PRI 2021). As signatories, OTPP, IFM, and BCI each adhere to responsible investing principles considering environmental, social, and governance (ESG) factors in all its portfolio companies, as reflected in their investment and strong support in GCT.

In 2014, GCT joined Green Marine, a voluntary, environmental certification program for the North American Marine Industry. As a participant, GCT has individually certified its facilities with a commitment to strengthen the North American marine sector’s environmental performance through continuous improvement, stronger relations with stakeholders, and increased overall awareness of the marine industry’s activities and environmental benefits. Full certification of facilities came into effect in 2015 and remains in place today. In 2018, GCT joined the VFPA-endorsed Climate Smart Program, aimed at achieving reductions in greenhouse gas (GHG) emissions. GCT was also honoured with the prestigious Clean50 Top 15 clean projects award. As its terminals continue to expand and increase capacity, sustainability and environmentally-responsible practices remain a core focus, both locally and globally. GCT is committed to supporting and protecting the communities where the company operates and continuously evaluates initiatives that will contribute to sustainability through the Global Commitment initiative<sup>1</sup>.

**Table 1: Proponent Information.**

PROJECT	
Proposed Project Name	GCT Deltaport Expansion, Berth Four Project (DP4)
Project Location	Roberts Bank, Delta, BC, Canada
Project Industrial Sector and Type	Marine Shipping
Proponent Name	GCT Canada Limited Partnership 1285 Franklin Street, Vancouver, BC, Canada V6A 1J9
PRIMARY CONTACT INFORMATION	
Name	Mike McLellan, Vice President, Project Development
Mailing Address	Suite 610, The Landing, 375 Water Street, Vancouver, BC, Canada
Phone	604 267 5195
Email	<a href="mailto:mmclellan@globalterminals.com">mmclellan@globalterminals.com</a>
Website	<a href="https://globalterminals.com/">https://globalterminals.com/</a>
SECONDARY CONTACT INFORMATION	
Name	Marko Dekovic, Vice President, Public Affairs
Mailing Address	Suite 610, The Landing, 375 Water Street, Vancouver, BC, Canada
Phone	604 267 5276
Email	<a href="mailto:mdekovic@globalterminals.com">mailto:mdekovic@globalterminals.com</a>
Website	<a href="https://globalterminals.com/">https://globalterminals.com/</a>

<sup>1</sup> <https://globalterminalsCanada.com/globalcommitment/>



## 1.3 Project Purpose, Need, and Rationale

### 1.3.1 Purpose

The purpose of DP4 is to provide timely container handling capacity to Canadian exporters and importers based on GCT's historical experience and projected demand growth on the west coast of Canada. The Project's purpose also aligns with the objectives of the *Canada Marine Act*, including helping to ensure that Canada is provided with the marine infrastructure that it needs to support and promote its economic and social competitiveness and trade objectives.

### 1.3.2 Need for the Project and Rationale

The Port of Vancouver terminals are Canada's largest port complex, handling the most diversified range of cargo of any port in North America. In direct and indirect terms, the terminal operators in Port of Vancouver are a major contributor to employment and the economy of Canada. The provinces of BC, Alberta, Saskatchewan and Manitoba rely on the Port of Vancouver operations for market access and to help them meet their trade and economic objectives across Canada, as well as those dependent on USA destined gateway cargo. Private sector investment by marine terminal operators is a critical component to the Port of Vancouver's growth, competitiveness and sustainability. Attracting investment into operations and infrastructure maintains the competitiveness of the Vancouver Gateway, ensures high-performance standards, and positions Canadian exporters and importers effectively to gain access to international markets, secure new growth opportunities, and remain cost-competitive.

Container volumes in the Pacific North West Market (Seattle/Tacoma/BC) have grown by a CAGR of 2.5% between 2005-2019. Since 2005, Canada's west coast container volumes have continued to outgrow the Seattle/Tacoma area at a much faster pace. Between 2008-2020, since the Port of Prince Rupert opened its container terminal, BC has enjoyed a CAGR of 4.6%, including the economic decline in 2009. The recent long-term forecast has the BC market growing at a base case CAGR of 2.3% between 2020 and 2060. Based on a similar forecast, the need for additional container terminal capacity in BC will be required by the late 2020s or early 2030s in order to keep up with the demand for Canadian Exporters and Importers. DP4 represents an approach of incremental expansion of west coast container terminal capacity aimed at timely, efficiently and competitively delivering container capacity to Canadian exporters, consumers, and supply chain partners. The development of DP4 is timed to meet forecasts for growth, while an incremental approach accommodates for market fluctuations in container terminal demand and is designed to effectively facilitate increasing vessel size. Global marine shipping industry consolidation is resulting in fewer, but larger vessels, making fewer port terminal stops, and placing greater competition on terminal operators for their business. DP4 is the right-sized approach to deliver Canada's and our trading partners' needs for the upcoming thirty years through 2050.

GCT commissioned an independent study of demand for container capacity on the west coast of Canada (Black Quay Consulting 2021). Low, medium, and high growth scenarios were analyzed to 2050. These scenarios were then compared to existing and anticipated capacity at the five west coast container terminals: GCT Deltaport, Dubai Ports World (DPW) Centerm, GCT Vanterm and DPW Fraser Surrey, and DPW Fairview in Prince Rupert, as defined in Table 2.

**Table 2: Existing and Anticipated Capacity at West Coast Canada Terminals, Not Including DP4.**

Terminal	Operator	Existing Capacity (Million TEU/yr)	Planned or Proposed Expansion	Additional Proposed Capacity (Million TEU/yr)	Anticipated Capacity (Million TEU/yr)
GCT Deltaport**	GCT	2.40	-	-	2.40
DPW Centerm	DPW	0.85	Centerm Expansion Project	0.60	1.45
GCT Vanterm	GCT	0.84	GCT Vanterm Phase 1	0.20	1.04
DPW Fraser Surrey	DPW	0.60	-	-	0.60
DPW Fairview (Prince Rupert)	DPW	1.35	DPW Fairview Phase 2 Expansion	0.45*	1.80
<b>Total</b>		<b>6.04</b>		<b>1.25</b>	<b>7.29</b>

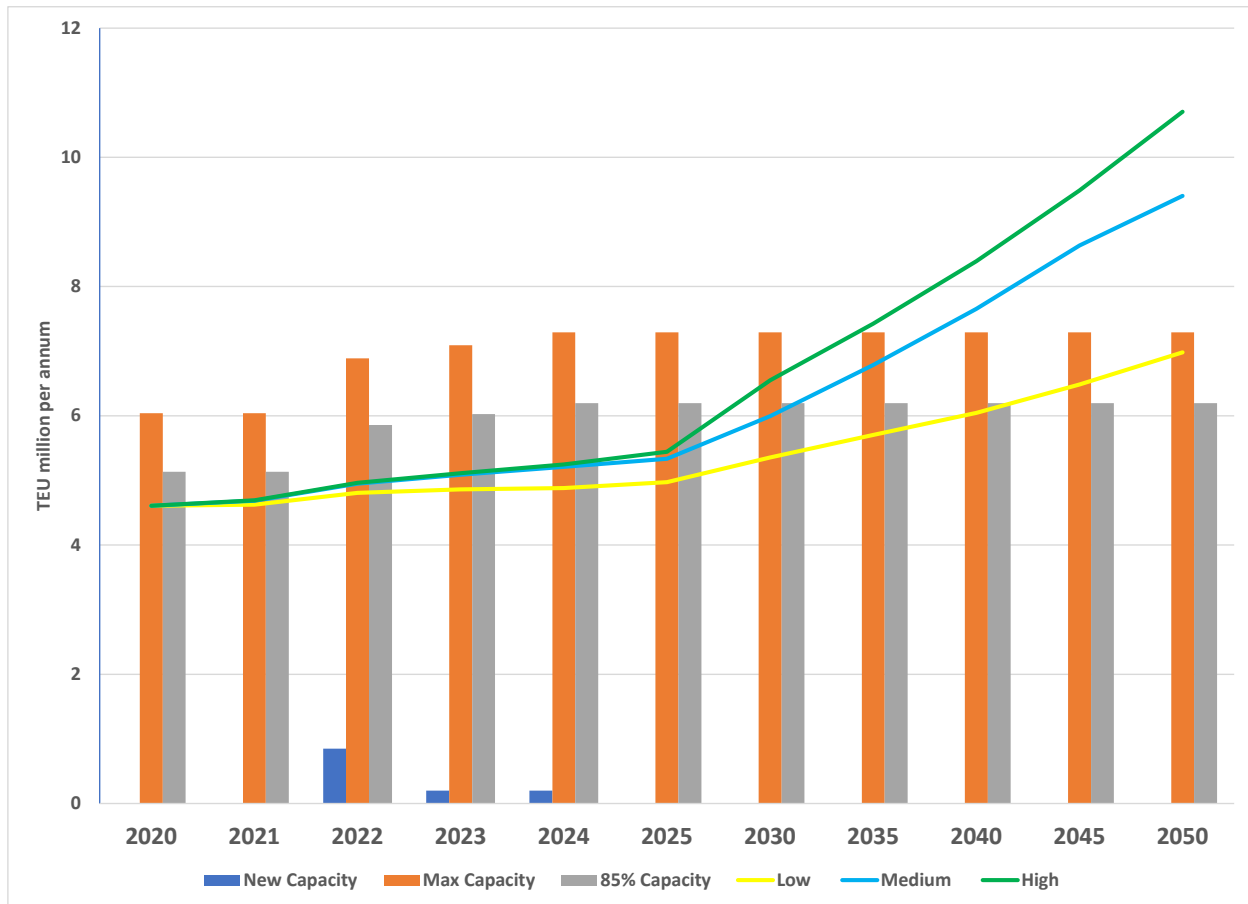
\* Prince Rupert Port Authority (PRPA) had previously indicated that they would like to expand container capacity at Fairview terminal from the existing capacity of 1.35 million TEU to 2.70 million TEU by 2025. In 2019, PRPA issued a press release explaining that Master Planning and capacity improvements at DPW Fairview would be limited to 1.8 million TEU by 2022, with the potential for a second container terminal in Prince Rupert with a capacity of 2.5 million TEU per annum. This potential capacity increase is not reflected in Table 2, as the proposed second terminal has not entered the Canadian environmental process at this time.

\*\* The VFPA is proposing the construction of the Roberts Bank Terminal 2 Project (RBT2), which has a planned capacity of 2.4 million TEU per annum. This potential capacity increase is not reflected in Table 2 since the viability of the proposed RBT2 project is pending environmental assessment regulatory approvals, establishment of a sustainable business case and procurement of a terminal operator. Based on the demand forecast, both the RBT2 and DP4 projects would not be required at the same time. GCT is advancing the DP4 project pursuant to assessments that it can be the first to address market demands through a more sustainable and financially viable project.

GCT has used the medium-growth scenario as its base case Project rationale, which is the industry standard used for project planning. GCT is also guided by the generally accepted port planning principle of ensuring new capacity is planned once 85% capacity utilization is approached.

A comparison of capacity, as defined in Table 2, and demand, under the low-, medium- and high-growth scenarios, is provided in Figure 3. Under the base-case medium-growth scenario and assuming the planned expansions at DPW Fairview, DPW Centerm, and GCT Vanterm that are presented in Table 2 are delivered, the analysis demonstrates a potential requirement for additional capacity sometime in the 2030s. The original analysis was completed before the impacts of the COVID-19 pandemic impacted global trade and demand. Annual growth in 2020 dipped below the average compound annual growth rate and posted only 2% growth, largely due to the COVID-19 pandemic. The COVID-19 pandemic during 2021 has had no negative impact on actual West Coast of Canada volumes.

**Figure 3: Predicted Demand vs Capacity of West Coast Canada Container Ports.**



GCT has a long history and experience operating leading container terminals on Canada’s west coast and the US east coast. GCT has a track record of collaboration with port authorities where it operates, and a unique perspective on delivering competitive facility capacity and services relevant to specific trade lanes. This experience underpins the capability of GCT to forecast, design, permit, deliver, construct and operate facilities in partnership with local port authorities or independently. At GCT Deltaport, GCT has engaged and developed long-standing working relations with local governments, businesses, its local workforce and union, various non-profit organizations and senior levels of government. GCT has engaged all these groups to share information about the development of DP4 and is well-positioned to work more formally with stakeholders in an organized program of engagement and consultation at the time DP4 enters the assessment process.

As an established marine terminal operator in the region, GCT has working relations with its shipping customers and the VFPA, which means that GCT will be able to deliver on its commitments and obligations, including those related to environmental protection. GCT has established long-standing engagement and working relationships with some of the local Indigenous nations and is committed to continuing to work in collaboration for the ongoing protection of the environment and Indigenous Interests.

### 1.3.3 Project Benefits

GCT's long history and experience in terminal operations within the Port of Vancouver allows the company to be uniquely positioned to meet the national demand for new container terminal capacity through the construction of this Project. The Project is expected to provide market-driven capacity that will meet the future needs of Canadian trade. The Project also aligns with the objectives of the VFPA Port 2050 Plan to accommodate Canada's trade needs, but at the same time maintaining a healthy environment and enabling thriving communities.

A preliminary assessment of project effects associated with DP4 compared against potential effects of RBT2 suggests that the Project may also have a smaller adverse environmental effect at Roberts Bank. DP4 would increase capacity by 2.0 million TEU compared to 2.4 million TEU for RBT2, but in a much smaller footprint and with the addition of only one berth compared to three for RBT2. This disproportionate gain in capacity from the Project results from more efficient utilization of the existing berths, yard, and rail infrastructure and having existing Deltaport infrastructure already in place with less redundancy in terminal support areas than would result from operating two separate discrete terminals in the event RBT2 were developed. The preliminary assessment reviewed issues including total habitat loss, crab closure areas, air quality, vehicle noise and night-time light associated with DP4 compared to RBT2 (PGL Environmental Consultants, 2017).

The preliminary capital cost estimate that GCT will invest is estimated at up to CAD 1.6 billion in capital and construction expenditures for the Project. This estimate will be refined during the Project's development and final design, and is expected to generate significant economic benefits in the Metro Vancouver region, the province of BC, and Canada.

GCT will provide an independent and objective assessment of the Project's economic impacts as part of the Impact Assessment, including measures of economic activity such as GDP, employment, labour income, and government tax revenues. Based on Project information known to date and current and anticipated GCT Deltaport operations, the following is projected for the DP4 Project:

- As identified in Section 3.6, construction of DP4 is estimated to create total employment of 10,000 full-time equivalent (FTE) jobs in Canada, consisting of direct employment of 4,700 FTEs in B.C., indirect and induced employment of 3,700 FTEs in B.C. and indirect and induced employment of 1,600 FTEs in the rest of Canada over the approximately 4 years of construction.
- The operation of DP4 is expected to require an increase in the current GCT Deltaport workforce of approximately 1,000 additional permanent jobs when at capacity.
- Based on the latest forecasted projections, GCT anticipates that the projected annual operation costs of Deltaport will average in excess of CAD 800 million over the first 5 years of operations and grow exponentially until at capacity.
- It is estimated that in excess of 90% of these annual operating costs will be incurred in B.C.

Positive economic benefits are also projected for the City of Delta given GCT's large capital investment in the Project. In addition, according to the VFPA, Port activities annually provide 4,800 well-paying family-supporting jobs, CAD 1 billion in economic activity and nearly CAD 8 million in annual municipal property taxes paid by port tenants (Port of Vancouver 2020). These benefits would increase dramatically if the Project were to proceed.

The Project will contribute economic benefits for BC and Canada through direct, indirect, and induced employment growth (see Section 3.6), gains in economic output/gross domestic product (GDP) and increased government revenues during the construction period and throughout the Project's operating term. The tax revenues from trade activities will support essential programs such as health care, education, and other social and environmental priorities. Although the majority of the expenditures are projected to occur in BC, the intended investment will impact the overall Canadian economy through the expenditures on goods and services, the employment of construction and support staff, the operation of the terminal, and the generation of various tax revenues.

Positive economic outcomes for Indigenous nations will also include training, employment and contracting opportunities. GCT is also committed to ensuring inclusiveness through its engagement activities and supporting economic opportunities, social needs and community well-being in a manner that is consistent with the principles of a Gender-Based Analysis Plus (GBA+) informed analysis.

Further Project benefits and attributes include:

- A cost-effective and timely way to address near-term container demand on the west coast.
- New investment in a physical area of operation where there are precedents of successful and recent container terminal development.
- Financing by institutional investor capital, thus removing financial risk to or demand upon the VFPA's or Federal government's financial capacity and fiscal frameworks.
- Involvement of an experienced terminal operator with a track record in operating similar infrastructure at Roberts Bank.
- Scalable delivery design that reflects changing industry trends and preserves optionality.
- Leverage of GCT Deltaport's existing footprint and infrastructure to build upon strong working relations with labour, customers, railways, and beneficial cargo owners as well as employment and economic benefits shared with the surrounding Indigenous nations, communities, and stakeholders. Leverage more efficient utilization of the existing berths, yard, and rail infrastructure and having existing Deltaport infrastructure already in place with less redundancy in terminal support areas than would result from operating two separate discrete terminals.
- Four contiguous berths future-proofing Port of Vancouver's ability to receive upsized vessels.
- A new marina for Tsawwassen First Nation to support fishing and other activities, where access to deeper water is not tide-bound.
- The option to accommodate short sea shipping in the future to move containers locally by barge, thereby reducing truck traffic in the region.
- GCT is also focused on maintaining sustainable and environmentally-responsible practices including the development of green infrastructure, examples of which are identified in Metro Vancouver's Regional Green Infrastructure Network Resource Guide<sup>1</sup>.

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<sup>1</sup> <http://www.metrovancouver.org/services/regional-planning/PlanningPublications/ConnectintheDots.pdf>

- Expansion of Canada’s largest on-dock marine terminal rail yard to become more effective in making Port of Vancouver a competitive destination for gateway cargoes.
- GCT’s approach to incremental, environmentally responsible growth through the DP4 Project is in line with the Government of Canada’s development of a blue economy strategy which is a key component for a more sustainable future to “build back bluer.” In the case of marine transport, growing a sustainable blue economy requires an approach to create jobs in coastal communities while considering the rate of growth for shipping and ocean health.

### 1.4 Environmental Assessment Regulatory Requirements

The Project may require assessment under both the federal *IAA* and the BC *Environmental Assessment Act* (BCEAA). Under the *IAA*, the Project meets the criteria for a designated project in the Physical Activities Regulations, and under the *BCEAA*, the Project meets the criteria for a reviewable project under the Reviewable Projects Regulation (Table 3).

**Table 3: Federal and Provincial Environmental Assessment Regulations Criteria.**

Section	Physical Activity	Relevant Project Component
IAA Physical Activities Regulation		
53 (Transport)	The expansion of an existing marine terminal, if the expansion requires the construction of a new berth designed to handle ships larger than 25 000 deadweight tonnage (DWT) and, if the berth is not a permanent structure in the water, the construction of a new permanent structure in the water.	The Project includes the construction of a new berth that will handle ships larger than 25,000 DWT and is a permanent structure.
BCEAA Reviewable Projects Regulation		
Transportation Projects (Table 13,4)	Modification of an existing project, other than a ferry terminal, if the modification of the project results in dredging, filling or other direct physical disturbance of: <ul style="list-style-type: none"> <li>• &gt;1,000 m of linear shoreline; or</li> <li>• &gt;2 ha of foreshore or submerged land, or a combination of foreshore and submerged land, below the natural boundary of a marine coastline or marine estuary.</li> </ul>	The Project will require the physical disturbance of over 2 ha of foreshore and submerged land at Roberts Bank.

As stated in Section 7.4.3, the Project is not expected to have operational emissions of 10, 000 tCO<sub>2</sub>e/yr or higher, and will not require reporting under the *Greenhouse Gas Industrial Reporting and Control Act* and the *Greenhouse Gas Emissions Reporting Regulation*.

In accordance with Section 95 of the *IAA*, the Project will incorporate Environment and Climate Change Canada (ECCC) information requirements for the Strategic Assessment on Climate Change (ECCC 2020). A key factor for consideration in the Strategic Assessment of Climate Change is the extent to which the effects of a project contribute or hinder the Government of Canada’s ability to meet its commitments to climate change and net-zero emissions by 2050. The Strategic Assessment of Climate Change requires quantification of GHG emissions from a project, assessment of upstream emissions if emissions exceed 500 kt CO<sub>2</sub>e, proponent’s net zero-emission plan, and includes a new requirement for information regarding GHGs mitigation measures and climate change resilience assessment.

GCT supports the principles of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). The processes set out in the IAA and BCEAA align fundamentally with the objectives of UNDRIP, including the processes to achieve Free Prior and Informed Consent (FPIC). Therefore, through participation in the Impact Assessment, Indigenous nations can provide their FPIC in relation to the Project. On June 21, 2021, the *United Nations Declaration on the Rights of Indigenous Peoples Act* came into force in Canada which is a legislative framework to implement UNDRIP in Canada. The government of BC, in November 2019, passed the *Declaration on the Rights of Indigenous Peoples Act* which established UNDRIP as the province's framework for reconciliation and mandates that the government brings provincial laws in alignment with UNDRIP.

## 1.5 Applicable Agreements and Policies

The Impact Assessment Cooperation Agreement between Canada and BC provides for cooperation before, during, and after the Impact Assessment (Government of Canada 2019). The agreement contains the administrative processes to support the principle of "one-project, one-assessment" that will be followed by provincial and federal agencies for projects subject to assessment by both jurisdictions such as DP4. Currently, a coordinated approach has been adopted by the IAAC and BCEAO to align their respective process and avoid delays and duplication of effort.

The Tsawwassen First Nation Final Agreement (the Treaty), a tri-partite agreement between Canada, BC and Tsawwassen First Nation provides Tsawwassen First Nation with certain rights and benefits regarding land and resources, and self-government over its lands and resources and its members (AECOM 2009). The Treaty became effective on April 3, 2009. It provides certainty with respect to ownership and management of lands and resources and the exercise of federal, provincial and Tsawwassen governmental powers and authorities, including requirements for the assessment of proposed projects that could adversely affect Tsawwassen First Nation lands and rights.

A *Species at Risk Act* Section 11 Conservation Agreement to Support the Recovery of the Southern Resident Killer Whale (SRKW) was signed by the Government of Canada, VFPA, Pacific Pilotage Authority and five marine transportation industry partners to support the recovery of the SRKW (A *Species at Risk Act* Section 11 Conservation Agreement 2019).

## 2 ENGAGEMENT SUMMARY

Early and ongoing engagement is a key focus for GCT in order to share Project-specific information and work collaboratively to find solutions that address issues and concerns. Early engagement is also a requirement of the BCEAO and IAAC's assessment process for major projects, including formal engagement on the IPD. GCT has welcomed the opportunity to further engage Indigenous nations, the public, government agencies and stakeholders, and since the IPD initially submitted to the BCEAO and IAAC in mid-September 2020, more than 500 interactions have been logged. These interactions have included individual e-mails to provide Project updates or coordinate meetings, conference calls and virtual meetings to share Project information, and numerous letters and phone calls to keep the lines of communication open and to build meaningful relationships. The following section provides a brief introduction to GCT's early engagement activities and where describe additional information can be found in Sections 8 and 9.

GCT also shared the draft DPD with Indigenous nations and government agencies and authorities to solicit further input to inform the DPD. As noted in Section 1, further details regarding the scope, procedures, and methods for the Impact Assessment will be developed in the Joint Guidelines and associated plans. A number of the comments that were provided to GCT on the draft DPD were related to the scope of the DP4 assessment, including the factors to be considered in the Joint Guidelines for the Project. GCT has tracked all the comments provided to date and identified those for further consideration and discussion during the development of the Joint Guidelines. A first draft of the Joint Guidelines will be prepared by GCT and submitted to IAAC and BCEAO who will tailor the document and consult on it with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuances of the final Joint Guidelines.

### 2.1 Indigenous Engagement

Meaningful engagement and collaboration with Indigenous nations are core values for GCT. GCT recognizes that ongoing engagement that is transparent, collaborative and meaningful is an important aspect of incorporation of Indigenous nations' concerns and input throughout the Impact Assessment and review process. GCT is committed to developing and maintaining strong, mutually respectful relationships with all Indigenous groups involved in the Project.

GCT's engagement with Indigenous nations has focused on providing information about the Project and any associated recent updates, considering input, and maintaining outlets to provide feedback and participate throughout the Impact Assessment and review process. GCT will continue to consider Indigenous nations' input to shape engagement and inform the Project design to avoid, mitigate and address potential adverse effects.

GCT has engaged with Indigenous nations and organizations through virtual meetings, phone calls, emails, and visits to administrative offices. GCT has inquired with each potentially affected Indigenous nation or their respective representative organization regarding their preferred methods of engagement and adopted those methods when applicable. GCT is also working to support Indigenous nations with appropriate levels of capacity funding and resourcing to participate in the engagement and assessment process.

The Project and associated marine shipping activities are either within or near the established or asserted traditional territories of 33 Indigenous nations and organizations which are identified in the Consultative Areas Database and the JSOIE report by IAAC and BCEAO (BCEAO EPIC 2020). Sixteen of the potentially affected Indigenous nations submitted notices to engage as PINs, which affords them procedural rights under the BCEAA including "capacity



funding, consensus-seeking processes, a procedure to communicate consent or withhold consent at specific decision points, and access to facilitated dispute resolution” (BCEAA 2019). IAAC guidance also asks proponents to indicate Indigenous nations that have self-identified as potentially affected by the Project (IAA 2019).

GCT’s ongoing engagement with Indigenous nations is described in Section 8. Section 8.3 describes the 33 Indigenous nations’ locations (reserves, treaty lands, offices, and established and asserted Indigenous territory) relative to the Project and its associated operational activities, affiliation with other Indigenous nations or organizations which pertain to the Project, Treaty status, status of forestry or other agreements, and status of implementation of the *First Nations Lands Management Act*.

GCT’s engagement with Indigenous nations to date, including the Indigenous Interests and issues they raised, and GCT’s responses to the issues raised in the JSOIE and through subsequent engagement, are summarized in Section 8.4. GCT has heard from many Indigenous nations regarding the importance of engagement and the development of Project assessment processes and documents which rely on both Indigenous Knowledge (IK) and western science. Tsawwassen First Nation has identified four pillars of life and nine principles which they recommend using to assess both the Project setting and potential Project effects on Tsawwassen First Nation’s Rights and Indigenous Interests, see Section 8.4.30. Several other Indigenous nations have also identified values and Indigenous Interests which will inform both the structure and content of the Impact Assessment, see the Indigenous nation specific Summary of Indigenous Interests and Issues Raised tables within Section 8.4 below. GCT has and will continue to work with Indigenous nations on how to best reflect and apply this information in both Project documents and processes.

The Project’s preliminary understanding of potential effects on Indigenous Interests is summarized in Section 7.8. The current status of agreements GCT has signed with Indigenous nations is presented in Section 8.5, while Section 8.6 summarizes how GCT has, to date, considered Indigenous Interests and issues in Project design. Section 8.7 summarizes GCT’s planned engagement activities and opportunities for GCT, Indigenous nations, IAAC, and BCEAO to work together throughout the Impact Assessment and review process.

GCT’s response to the issues identified by Indigenous nations in the JSOIE report, issued in December 2020 are provided in Appendix C: Responses to Issues and Indigenous Interest Raised in the Joint Summary of Issues and Engagement. In a review of the comments in the JSOIE, some were considered outside of the care and control of GCT and as such have been redirected to IAAC and the BCEAO (e.g., public confidence in the assessment process, scoping of marine shipping, road and rail and re-establishment of the Fraser River Estuary Management Plan) as noted in Appendix C.

## **2.2 Government, Public and Stakeholder Engagement**

Since 2016, GCT has engaged with municipalities, provincial and federal governments, the public and other stakeholders on DP4. The learnings from the engagements as part of each of these processes have informed the development of the IPD and continued engagement has further informed the DPD.

In developing the DPD, GCT is guided by the principles of meaningful, transparent, timely, and responsive engagement. GCT recognizes the importance of meaningful engagement and strives to develop and maintain strong, mutually respectful relationships with all Indigenous nations and stakeholders. GCT will also continue to maintain

and strengthen relationships developed during its previous engagements, primarily with those located near the facility including but not limited to the City of Delta and the VFPA.

Governments, the public and other parties identified in Section 9 include all those that GCT engaged with in the development of the Engagement Plan and following the submission of the IPD. Appendix C includes a summary of the results of engagement undertaken with jurisdictions or other parties, including a description of how GCT intends to address the issues raised in the summary referred to in subsection 14(1) of the IAA (Summary of Issues) and the BCEAA. In addition to the comments received in the JSOIE, details of feedback from these groups were tracked by GCT, including the dates of the engagement, correspondence and document exchanges, who was present from each organization, and the feedback received in relation to the Project.

Section 9.1.2 highlights the key interests or issues identified from this early public and stakeholder engagement and Section 9.2.2 highlights the government input and key interest or issues identified to date on the Project. These sections have been updated in the DPD to reflect the additional input since receiving the JSOIE. As noted above, a lot of the comments received were related to scoping of the Project and the Impact Assessment related to recommended studies, marine shipping, road and rail, climate change and related sea-level rise, cumulative effects, marine spills and spill response. In addition, there were comments received highlighting the importance of engagement and creation of opportunities for Indigenous nations and under-represented groups, as well as the consideration of gender and age aspects during future engagement.

Documents, including the IPD, Early Engagement Plan and detailed presentations regarding the proposed Project, were made accessible to government, the public and stakeholders by posting the documents online and providing electronic copies directly to groups. When requested, GCT also provides hard copies of the documents for review.

## 3 PROJECT DESCRIPTION

### 3.1 Project Updates and Changes

Since the September 2020 submission of the IPD, GCT has continued to advance the design of the Project, including updates to Project activities, schedule, alternative means of carrying out the Project, and options to reduce the overall Project footprint based on feedback received through early engagement. Recent updates are described below:

- Updated information on Project construction activities including their sequencing to inform potential spatial and temporal interactions with various valued components (VCs) which will be further evaluated through the development of the Joint Guidelines, as described in Section 1. Engineering design and sequencing refinement will progress in parallel with the assessment process to further inform how the Project will interact with VCs and the changes that will result.
- Additional detail on potential Project components including consideration of a short sea shipping berth for the future movement of containerized goods, amongst other reasons, as an alternative to trucks due to its environmental benefits
- Clarity on the area that will require dredging to support the various Project components, including dredging within the existing DP3 dredge pocket that will be required to accommodate larger vessels.
- Clarity on the location of the rock berm structure to provide crest protection on the seabed to mitigate against dendritic channel formation.
- Updated information on timelines for the Project's assessment and permitting processes, including submission dates for key regulatory documents.
- Updates to the Project's operations phase workforce estimate, including additional detail on the workforce environment, and annual operational and maintenance costs.
- Additional information on alternative means of carrying out the Project to address DPD requirements and ECCC's Strategic Assessment of Climate Change requirements.

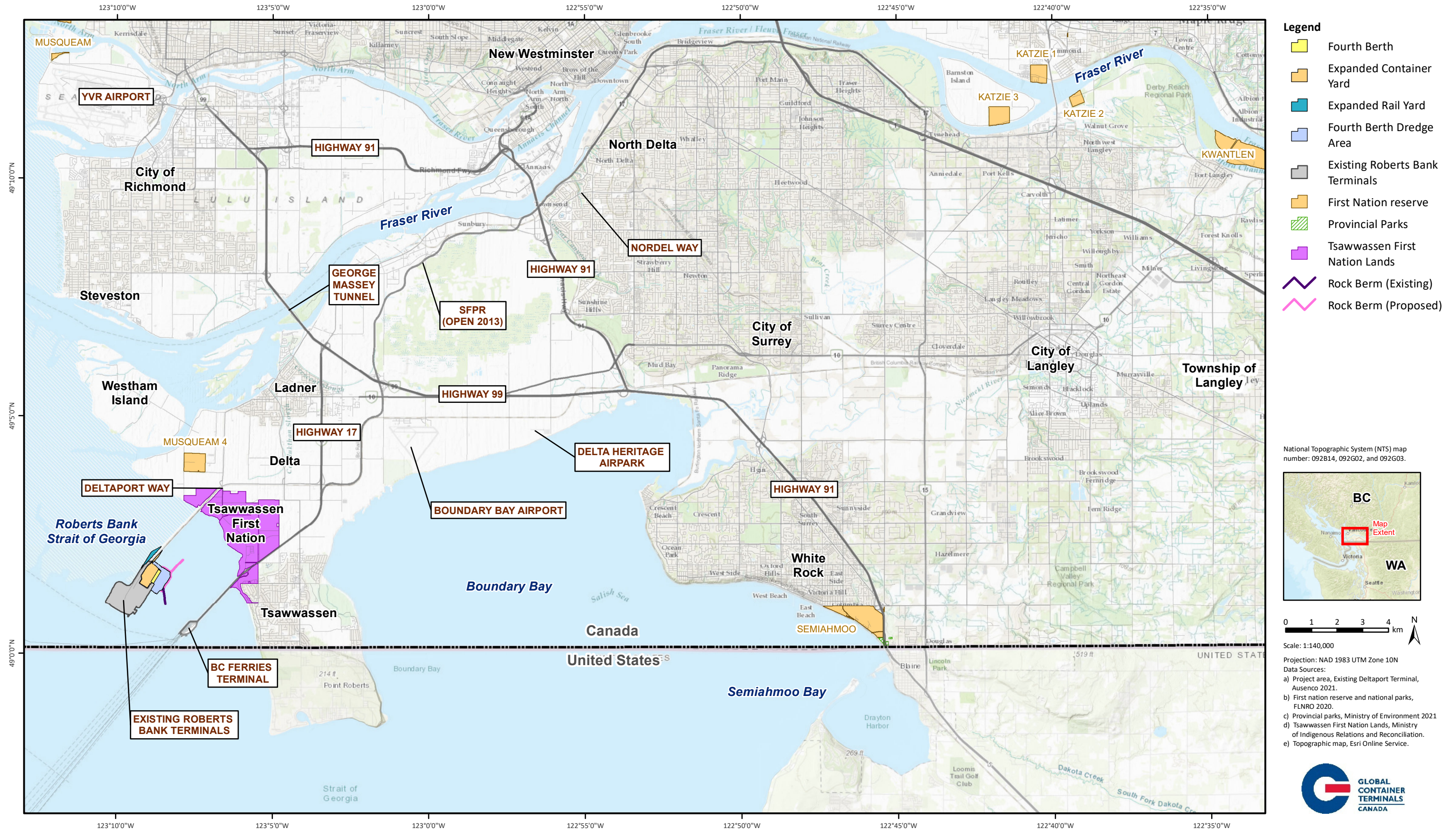
GCT will continue to advance the design as the Project navigates the assessment process and will focus on evaluating various technically feasible and financially viable options to address key issues raised during the early engagement.

### 3.2 Project Location

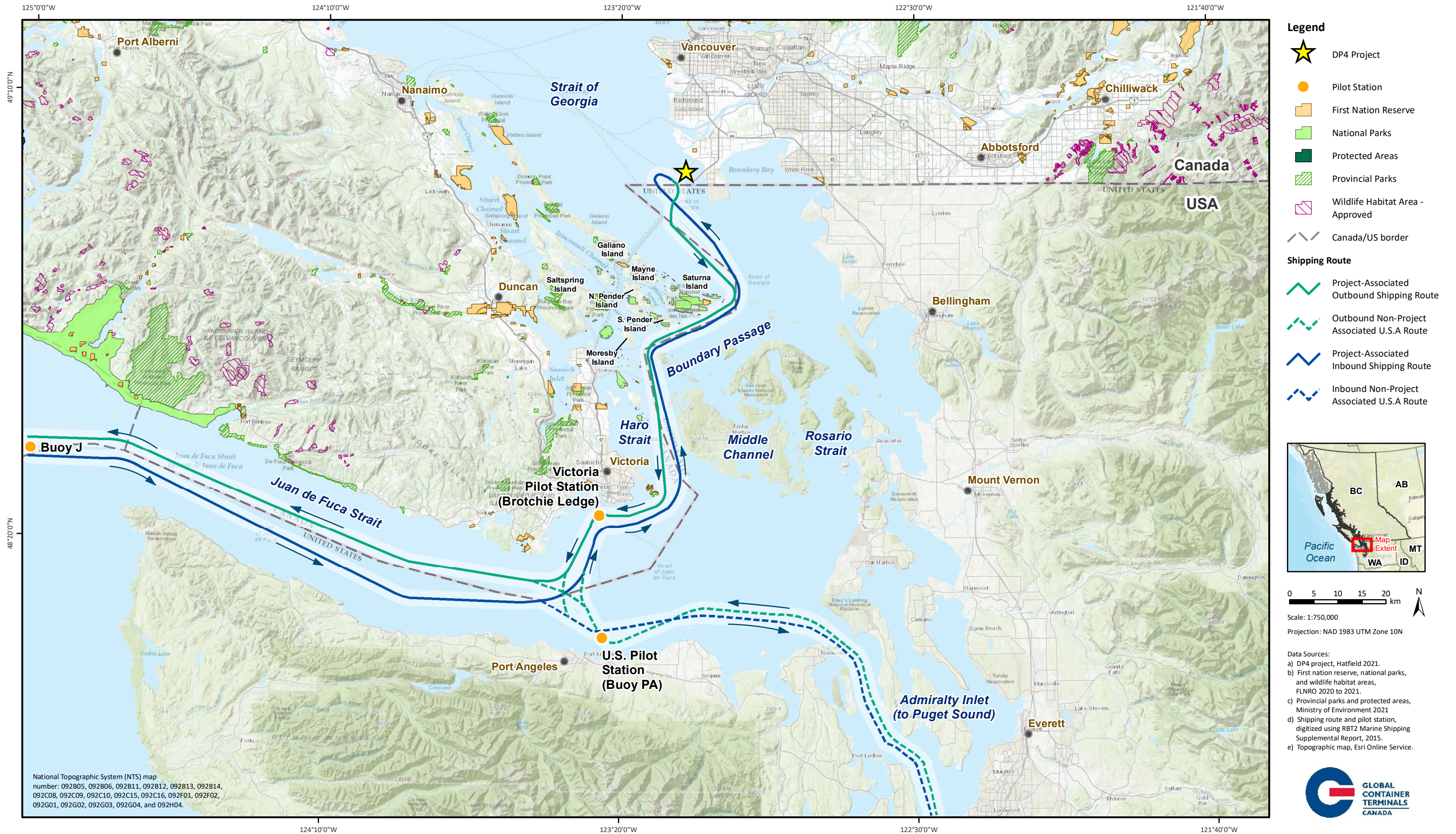
The DP4 Project is located to the northeast of the existing GCT Deltaport Container Terminal in Roberts Bank. The Project is located within the boundaries of the City of Delta. The nearest residential communities to the Project within the City of Delta include the communities of Ladner (9 km distance), Tsawwassen (9 km distance) and North Delta (28 km distance). No seasonal or temporary residences are located in the vicinity of the Project (see Section 6.4.2).

The coordinates for the center of the DP4 expansion are approximately 49°01'25" N 123°09'10" W (Figure 4). The coordinates for the proposed endpoint of the marine shipping route (Buoy J) that is incidental to the Project are 48°29'45" N, 124°59'29" W (Figure 5).

Figure 4: GCT Deltaport Expansion, Berth Four Project Location.



**Figure 5: Marine Shipping Routes for Container Ships.**



### 3.3 Project Overview and Components

The DP4 Project is an expansion of the existing GCT Deltaport Container Terminal to add a fourth berth and additional land-based container storage and handling to increase capacity by 2 million TEU per annum. It would also include the expansion of a portion of the existing causeway to accommodate a larger on-terminal intermodal rail yard, a barge berth to accommodate anticipated future demand for short sea shipping, a Tsawwassen First Nation marina and the relocation of the existing tug basin. Dredging will be required to accommodate the various Project components (Table 4).

#### ***Terminal Expansion***

The Project proposes an expansion of the terminal footprint by approximately 56 ha to achieve the increase in capacity. This equates to a terminal footprint approximately two-thirds larger than existing. To provide the fourth berth and access for the larger container ships that are expected to call at the terminal, the berth face will be extended by approximately 560 meters.

Construction of the container and storage handling area would be made operational in two stages. The first would be approximately 15 ha of additional container storage and handling capacity west of the existing third berth. The second would involve the remainder of the container and storage handling area expansion and the other Project components.

#### ***Intermodal Rail Yard Expansion***

The Project includes an expansion of approximately 12 of the 56 ha along the west side of the causeway. Of the 12 ha, 7 ha are for the expansion of the length of on-dock rail tracks to add rail-handling capacity and 5 ha are for the expansion to buildings, truck gates, truck interchange area and roadways. The expansion would increase the width of the causeway at the location where the causeway alignment deflects due to an anecdotal survey error that occurred during the original 1960's construction.

#### ***Short Sea Shipping Berth***

Optionality to include infrastructure that may support a new barge berth is proposed as part of the project to accommodate future potential demand for short sea shipping capability.

Short sea shipping, or the local movement of containers by barge, is an alternative to truck transportation within Metro Vancouver. The VFPA and Transport Canada are working with industry stakeholders to advance short sea shipping in the Port of Vancouver, to increase the sustainable movement of containers through the Port of Vancouver (VFPA 2020). Short sea shipping is estimated to be 3.7 times more fuel-efficient than transportation by truck (Metro Vancouver 2020a) which in turn leads to reduced fuel costs and consumption, reduced GHG emissions, less noise and air pollution. Currently, the only two active examples of short sea shipping container barge service in the region are from DPW Centerm to/from the DPW Duke Point terminal (Port of Nanaimo), due to the fact that under prevailing conditions, the movement of containers by short sea shipping further inland upstream along the Fraser River is not competitive with transportation by truck. DPW has also recently trialed a short sea shipping run between their DPW Fraser Surrey Docks located on the Fraser River to DPW Centerm in the inner harbour of Vancouver.

GCT is pursuing the inclusion of infrastructure for a short sea shipping berth in anticipation that governments may mandate alternatives to trucking in the future, or dynamics in the market may change. If it is determined that short sea shipping capability is not required, the terminal footprint would remain the same, and the area would be used for

terminal operations, such as container storage and/or the (un)loading of container trucks. The bulkhead at the short sea shipping berth would still be required for the terminal expansion and therefore the inclusion of the short sea shipping berth makes little difference to the Project design. Construction techniques would also be similar, with the exception of a slightly larger dredge footprint of approximately 3 ha to accommodate the safe movement of short sea shipping vessels.

### ***Tsawwassen First Nation Marina***

Based on GCT's engagements with Tsawwassen First Nation, a marina may be incorporated into the Project design that can support access to fishing vessels and other activities, where access to deeper water is not tide-bound. As a result, the Project includes provision for such a facility and may include floating dock facilities for crabbing and fishing boats, a boat ramp for trailer launching, a floating dock for temporary mooring of launched boats, and parking for vehicles and trailers. The facility may be adjacent to or located within the water lot or portion thereof which is proposed to be transferred to Tsawwassen First Nation pursuant to a memorandum of agreement between Tsawwassen First Nation and VFPA. This is in line with GCT's commitment to work in collaboration with Indigenous nations and to identify potential mitigation measures and to find opportunities for mutual benefit. The nature of the use (commercial, recreational, etc.) will be determined by Tsawwassen First Nation, and the results will be included in the assessment of marine traffic incidental to the Project.

### ***Tug Basin Relocation***

The terminal expansion overlaps with the existing tug basin and therefore a new tug basin will be required to support operations. Based on the preliminary design of berth four, the existing tug basin would be temporarily relocated at some point during the progress of dredging and landfilling so as to be accessible directly from the Roberts Bank causeway in the vicinity of the future Tsawwassen First Nation marina, within the proposed Project footprint. Ultimately, the new tug basin would be permanently located at the north end of berth four and the area temporarily used as a tug basin converted to the Tsawwassen First Nation marina.

### ***Dredging***

Dredging will be required for ships to access the fourth berth as an extension to the existing dredge pocket, and to accommodate the new Tsawwassen First Nation marina, relocation of the tug basin and short sea shipping berth. Dredging may also be required beneath the expanded container storage and handling area to achieve seismic stability requirements, depending on the construction methodology selected. The size of the dredge pocket for the Project is anticipated to be approximately 30 ha. Additional dredging equivalent to approximately 13 ha will also be required within the existing dredge pocket for DP3 to accommodate larger vessels. GCT will explore options to reuse the dredged material for causeway and terminal land reclamation, and/or the creation of new habitat, as an alternative to disposal at sea at an approved location. If re-use material is limited, there may be potential for disposal at sea at an approved location, however, the disposal at sea requirement has not yet been determined and therefore a disposal site has not been identified. There is an existing ECCC approved disposal site at Point Grey. If at any point as the Project progresses, disposal at sea becomes a requirement, GCT will engage the ECCC and other relevant authorities and Indigenous nations.

The intertidal zone in the inter-causeway area is historically known to be sensitive to the formation of dendritic channels (Hemmera Envirochem Inc. 2015). The Project design is being developed with consideration for such erosion/ scour and broader geomorphological concerns. Consequently, this will require the replacement of existing and installation of new crest protection, e.g., rock berms or other mitigation along new and transverse to proposed

seabed slopes to mitigate against the development of dendritic channels and to stabilize and protect against other geomorphological changes that may result from the Project.

### **Other Upgrades, Improvements and Services**

Upgrades to the existing wastewater treatment facility will be required to accommodate the increased terminal area, as well as upgrades and extensions to underground stormwater, water, sanitary, electric, and data utilities within the Project area. Existing roads on the causeway will also require upgrades, including the relocation of the existing Westshore overpass. New Administration, Operation and Security buildings will also be required, plus an additional workshop to service and maintain new container handling equipment (CHE), including storage areas for spare parts. No additional expansions to the terminal will be required to accommodate these upgrades, and no new work camps or housing requirements are anticipated to support the Project construction or operations. It is anticipated that the majority of the workforce will be drawn primarily from the Metro Vancouver area.

**Table 4: Project Components.**

Component	Description based on Project Design
Marine berth	560 m berth extension. The berth will require crane rail, fenders, mooring bollards, ship-to-shore power and safety rails.
Mitigation for coastal morphology (crest protection)	Crest protection potentially consisting of rock berm structure or alternative mitigation on the seabed, to address the risk of dendritic channel formation.
Container handling and storage area	44 ha expansion of the existing terminal for container handling and storage.
Intermodal rail yard expansion	7 ha expansion to expand the existing intermodal rail yard and 5 ha to accommodate truck gates, buildings and ancillary roadways, all to balance the expanded container storage and marine berth capacity.
Causeway road improvements	Upgrades to the existing causeway roads and relocation of the Westshore overpass. No additional expansion of the causeway to the mainland is required.
Utilities	Underground stormwater, water, sanitary, electric, and data utilities to service expanded terminal area
Wastewater treatment facility	Upgrades to the existing wastewater treatment facility to accommodate the increased terminal area.
Offices and buildings	New building for Administration/Operation/Security. Additional workshop to service and maintain new CHE, including storage area for spare parts.
Container handling equipment (CHE)	Additional loaded and empty CHE, yard and rail gantry cranes, and ship-to-shore crane or mobile crane at the new berth.
Short sea shipping infrastructure	Infrastructure for a barge berth to accommodate future potential demand for short sea shipping capability including fendering and mooring system and a barge to shore rail-mounted crane.
Tug basin	Relocated tug basin with floating dock moorage and ramp system for shore access at the north end of berth 4.



**Table 4: (Cont'd.)**

Component	Description based on Project Design
Tsawwassen First Nation marina	A fishing boat marina may be incorporated into the Project during the early engagement with Tsawwassen First Nation. The marina would include a floating dock facility and harbour to support year-round in-water fishing vessels as well as smaller vessels via a boat launch ramp and include vehicle parking.

Table 5 compares the size of the existing infrastructure and components at GCT Deltaport with the estimated size of those key components that require expansion as a result of the Project. Project components that require upgrades or relocation (i.e., causeway road improvements and tug basin relocation) with no expansion in size are not included.

**Table 5: Estimated Size Comparison of Existing and Proposed Project Infrastructure and Components.**

Facility Areas	Existing Deltaport Facility	Proposed DP4 Expansion	Deltaport including DP4
Container handling and storage	40 ha	44 ha	<b>84 ha</b>
Intermodal rail yard	12 ha	7 ha <sup>1</sup>	<b>19 ha</b>
Buildings, truck gates, misc. other areas	33 ha	5 ha	<b>38 ha</b>
<b>Total areas:</b>	<b>85 ha</b>	<b>56 ha</b>	<b>141 ha</b>
<b>Other key components</b>			
Marine berth	1100 m	560 m	<b>1660 m</b>
CHE	34 Yard Rubber Tired Gantry Cranes (RTGs) 12 Ship to Shore Cranes 8 Rail Rail Mounted Gantry Cranes (RMGs) Misc. support CHE	58 RTGs or RMGs 8 Ship to Shore Cranes 6 Rail RMGs Misc. support CHE	<b>92 RTGs or RMGs</b> <b>20 Ship to Shore cranes</b> <b>14 Rail RMGs</b> <b>Misc. support CHE</b>
Tsawwassen First Nation marina	N/A	12 fishing boats Boat ramp Truck-trailer parking	<b>12 Fishing boats</b> <b>Boat ramp</b> <b>Truck-trailer parking</b>
Capacity-TEUs	2.4m TEU	2.0m TEU	<b>4.4m TEU</b>

The spatial boundaries associated with the assessment of the Project, including the local and regional study areas specific to each VC, will be defined in the separate Joint Guidelines, following acceptance of the DPD by the IAAC and confirmation that the Project is ready to formally enter the assessment process by BCEAO. A first draft of the Joint Guidelines was prepared by GCT and submitted to IAAC and BCEAO who will tailor the document and consult on it prior to the issuances of the final Joint Guidelines. GCT continues to evaluate and engage on the selection of appropriate VCs, which will be subject to formal engagement led by the IAAC and BCEAO after the readiness decision.

<sup>1</sup> The rail intermodal yard area is the estimated area of the seven rail tracks only. The proposed expansion of the rail intermodal yard area is actually only two hectares (as compared to seven hectares) as the expansion is in an existing rail yard operated by the railways.

## 3.4 Project Activities

### 3.4.1 Construction

Construction activities include preparation of the existing site to accommodate the expansion, fabrication, and installation of concrete structures, and handling of material, including rock, sand and sediment via dredging and filling. A majority of the construction materials would be moved to the Project site via marine shipping (i.e., fill and dredgeate, caissons, steel piles, concrete, paving via barge), whereas other materials such as utilities, site and building improvements will likely be trucked to the site. Transportation corridors for the movement of materials and whether the Project will require off-site staging or laydown areas are unknown at this time and will be further explored through the Project's assessment. However, major roads for truck transportation in the vicinity of the Project include the South Fraser Perimeter Road, Highway 17A, Highway 99, Highway 91, and Deltaport Way.

Construction activities associated with the development of land reclamation for DP4 will be conducted in a controlled sequence to efficiently handle and minimize the rehandling of both dredgeate and imported fill materials. Construction planning will be further developed and will change as a result of future design phases, additional consultation and the Impact Assessment process. These are based on preliminary engineering designs to date using knowledge and experience associated with the recent development of the DP3 project. Specific structural details, dredge slope stability, and crest protection alignment will be confirmed based on further geotechnical testing and geophysical modelling during detailed design. Detailed construction activity scheduling will also be done during the scoping of construction contract procurement work packages. These activities will occur in parallel with the Project Assessment such that sufficient information is available to input into technical studies, including modelling, and to assess the effects of the Project.

#### ***Dredging and Land Reclamation for Terminal Expansion***

Construction activities for dredging and land reclamation of the two terminal expansion areas, namely, the area on the east side of the causeway for container yard expansion and the area on the west side of the causeway for intermodal yard expansion, are similar. Both require the construction of perimeter containment dykes using a combination of imported rock materials delivered via barge.

Containment dykes would be first constructed along the east and north side of the land reclamation area for the container yard expansion and along the west and north side of the land reclamation area for the intermodal yard expansion to isolate these terminal expansion areas from the surrounding marine environment. These containment dykes become the exterior shoreline protection for the expanded areas to protect against erosion by wave action and contain sediment transport of any fine materials in suspension during subsequent dredging and filling within the perimeter. A variety of imported rock fill materials would be transported to the Project site via barge from existing quarries.

Foreign debris will be removed using barge-mounted cranes for disposal prior to dredging soft, loose seabed materials from within the containment dyke areas. Dredging will be performed using hydraulic cutter-suction dredge equipment.

Suitable dredge material would be re-used to the greatest extent possible for construction and habitat offsetting. This material would be placed at lower elevations within the land reclamation areas. Imported sand fill material is expected to be supplied by the annual Fraser River maintenance dredging program and would be brought to the site by barge. GCT does not intend to transport fill material to the site by truck.

A fleet of site-bound construction equipment will likely be mobilized via road delivery as construction stages advance above high tide elevation. This equipment would remain on site until construction nears completion and then be demobilized via road again.

Following placement of dredgeate and imported sand fill within the interior of the containment dykes to the desired final elevation of the land reclamation areas, grids of vertical wick drains would be installed prior to placing additional imported sand fill placed to higher elevations as a surcharge material to induce advanced settlement of the landfill materials prior to constructing below grade utilities and surface improvements such as pavements. The surcharge program will be designed to reduce post-construction settlements to tolerable amounts.

After settlement and removal of the excess surcharge material, the pavement subgrade may be further densified using dynamic compaction if deemed necessary based on monitoring surveys during construction.

### ***Dredging for Berth 4 Expansion***

Dredging will be required outside of the perimeter containment dykes to construct the deep-water channel extension, berthing area, and foundation for the wharf caisson structures. Dredgeate removed from these areas that are suitable for re-use in terminal construction will be placed within the land reclamation areas surrounded by the perimeter containment dykes. The remaining dredgeate will be barged offsite to areas of habitat offsetting or for disposal at sea.

The north end of the existing Berth 3 caissons will require strengthening and temporary works prior to dredging the foundation area for Berth 4 caissons. This will involve a combination of compaction grouting by barge-mounted equipment to densify the underlying material and potentially temporary sheet piling by land-based equipment, to provide additional lateral confinement of the existing caissons.

Soft, loose seabed materials will be dredged from the foundation area for the wharf caisson structures concurrently while dredging the deep-water channel extension. Underlying soils remaining within the Berth 4 foundation area will be improved using one more means of ground improvement such as vibro-densification or vibro-replacement via barge-mounted equipment. The ground improvement method will depend on the required strength needed to support the wharf caisson structures.

A layer of larger-sized mattress rock will be placed on the improved foundation area for the wharf caisson structures, followed by a layer of smaller-sized levelling rock, prior to placement of the caissons.

Prefabricated concrete caissons constructed at an offsite location will be towed to the Project site and placed within the foundation area starting at the north end of existing Berth 3 and continuing northward. Once the caissons are placed into horizontal and vertical alignment, internal cells will be filled with imported rock transported via barge to increase the mass and stability of the caisson structure.

The caisson cells will then be capped with precast concrete slabs grouted together to create a continuous surface behind a cast-in-place concrete cope wall which becomes the exterior Berth 4 wharf face and support for the waterside leg of the ship-to-shore cranes. Electric supply to power the ship-to-shore cranes will be integrally cast into the cope wall construction. Ship fenders, mooring bollards, ladders, and safety rails are then mounted to the side and top of the cope wall.

Imported rock fill will be placed along the landward side of the wharf caisson structure and the containment dyke previously placed around the perimeter of the container yard expansion area up to the level to the caisson capping slabs. Imported sand fill will then be used to raise the elevation of the Berth 4 wharf to the desired final elevation of the adjacent container yard expansion land reclamation area.

Cast-in-place concrete grade beams will be constructed along the landward side of the Berth 4 caisson structure to support the landside leg of the ship-to-shore cranes.

### ***Shallow Water Access Channel serving Short Sea Shipping, Relocated Tug Basin, Tsawwassen First Nation Marina***

A shallow-water access channel will be dredged along the north side of the terminal expansion area to create a shallow water access channel to serve a potential short sea shipping berth, relocated tug basin, and Tsawwassen First Nation marina. Construction activities associated with these project components will include dredging the shallow water access channel from the north end of the Berth 4 deep-water access channel to the east side of the existing Roberts Bank causeway.

Scour protection will be placed on the seabed slopes in the shallow-water channel and new crest protection constructed along the top of the slope. Barge mounted pile driving equipment will be mobilized to construct mooring anchorage for floating dock platforms in the relocated tug basin and Tsawwassen First Nation marina.

### ***Site Improvements for Terminal Expansion***

Following completion of dredging and land reclamation construction for the terminal expansion, below-ground utilities and surface improvements can then be constructed for the container yard expansion, intermodal yard expansion, and causeway road improvements.

Imported pavement subbase materials transported to the site via barge will be placed and compacted prior to final surface paving. Pavement and concrete materials will be transported by barge as either pre-batched materials at off-site plants or pre-mixed materials for final batching on site.

Domestic water needed for on-site construction activities, such as concrete preparation, will likely be supplied through the existing municipal water service to the existing GCT Deltaport terminal depending upon the quantity of water needed. No water discharges to the ocean are expected from these construction activities.

A new overpass will be constructed further north on the causeway, outside of what is anticipated to be GCT's new lease boundary to allow the intermodal rail expansion and maintain grade-separated road access to Pod 3 and the Westshore coal facility. The existing overpass will then be demolished.

Railway materials such as ties, rail, switches, ballast, will be delivered by water via barge or by rail cars via train. Cast-in-place concrete grade beams will also be constructed in the intermodal yard as extensions of existing beams used to support both the near side and far side of the cantilevered rail-mounted gantry cranes.

## **Utilities**

Underground stormwater, water, sanitary, electric, and data utilities to service the expanded terminal area will be constructed following completion of the land reclamation work. The existing wastewater treatment facility at Deltaport will be upgraded to accommodate the increased terminal area.

The existing Deltaport facility is powered by BC Hydro overhead transmission lines located the entire length of the Roberts Bank causeway. Electric power for the Project site will be transformed and distributed via a network of underground ducts and vaults. Data will be transmitted via a similar network of underground fibre optics, as well as wireless technology.

The closest existing point of diversion for irrigation is approximately 3.5 km to the north, located along Canoe Passage. There are no irrigation water intakes located within the Project area.

## **Container Handling Equipment**

Additional loaded and empty CHE, yard and rail gantry cranes, and ship-to-shore cranes will be installed at the new berth. Equipment will be delivered partially or fully assembled to the Project site via special ocean-going vessels. Equipment will be offloaded from the vessels for final testing and commissioning prior to being put into operation.

In summary, the following sequence of construction activities have been identified (also discussed in Section 3.4.1) and are presented in the approximate order that they will occur:

- Mobilize heavy marine equipment for dredging work.
- Transport aggregate, rock, and fill via barge for marine construction.
- Undertake strengthening and temporary works at the end of the existing DP3 terminal caissons to permit dredging adjacent to the north end of the caissons. This will involve a combination of compaction grouting by barge-mounted equipment to densify the underlying material and potentially temporary sheet piling by land-based equipment, to provide additional lateral confinement of the existing caissons.
- Dredge loose top seabed layer materials in Stage 1 fill area. If contaminated sediments have been identified they will likely be dredged using mechanical dredging equipment fitted with environmental buckets, isolated within sealed barges for transportation to an approved on-land disposal facility. Reuse uncontaminated dredge material, as far as possible for construction and habitat offsetting, and dispose of the remainder. Debris to be removed by barge-mounted crane for disposal.
- Place reused dredge material and imported fill (likely Fraser River sand) into Stage 1 fill area.
- Install wick drains in Stage 1 fill area to encourage settlement and place additional fill as required to maintain level grade.
- Place slope protection material on the north end. Rip-rap placed by barge-mounted crane.
- Dredge temporary tug basin and install sheet pile wall for temporary tug berths.
- Dredge loose top seabed layer materials in Stage 2 fill area, as described for Stage 1 above.
- Dredge basin for DP4 using hydraulic dredging equipment. Material for reuse will be transported by submerged pipe as an alternative to disposal at sea, however, if reuse material is limited there may be

potential for disposal at sea at an approved location. No disposal at sea location has been defined as the requirement for disposal at sea has not yet been determined.

- Construct crest protection structure at top of dredge basin slope. This will likely be rock placement by a barge-mounted crane.
- Dredge area where caissons will be located within Stage 2 fill area to provide structural stability.
- Install structural replacement fill to bottom of mattress layer.
- Densify replacement fill layer to depths indicated and place additional fill as required to maintain level grade. Densification will involve pre-loading, using a combination of wick drains and surcharge material. More advanced soil densification methods will be considered in specific areas, such as the building footprints, overpass foundation abutments, and the landward side of DP4. Vibro-densification may be necessary for areas where the wharf caissons will be installed.
- Install mattress layer of varying grades of rock. Densify mattress. Top-up mattress material as required.
- Place final level coarse material onto the mattress layer under the footprint of the caissons.
- Install precast concrete caissons using marine heavy lift equipment and infill rock material into caissons. Caissons will be fabricated off-site and floated to DP4 using tugs.
- Place fill material in Stage 2 fill area up to edge of caissons. Re-use dredge material, as far as possible. Install rock berm behind caissons.
- Install wick drains as described for Stage 1.
- Install slope protection on the north end as required.
- Install caisson cover slabs, cast concrete cope beam, cast concrete rail beam and wall extensions and place structural fill over caissons to indicated grades.
- Complete fill to final elevation and place asphalt or other grade surfacing.
- Cast concrete grade beams for rail-mounted gantry cranes and rear rail support for container cranes.
- Mobilize pile driving equipment for marine pile driving. Construct tug berth: drive piles, cast concrete pile cap, install fenders and mooring points.
- Construct docks for Tsawwassen First Nation marina. Drive piles, cast concrete caps, install mooring and berthing elements.
- Place scour protection on seabed slopes as required in the shallow water access channel to the short sea shipping berth, tug basin, and Tsawwassen First Nation marina.
- Install high tower lighting for the yard including foundations.
- Construct building foundations and buildings, such as sub-station, admin building, etc.
- Install all civil utilities throughout the yard and to the berth area.
- Install berthing and mooring points on DP4 container berth.
- Install all bull rails, railings, ladders, etc. around the berth edge as applicable.

- Install rails for rail-mounted equipment, including gantry cranes and container cranes.
- Install fire suppression equipment.
- Paint lines on the pavement for parking, etc.
- Install and commission cranes.

### 3.4.2 Operations

The operation of DP4 will be very similar to the container handling operations within the existing GCT Deltaport facility. Full container imports unloaded from the ocean-going container vessels will be unloaded on the Berth 4 wharf and stored on the ground in container stacks located in the expanded yard area. A majority of these full import containers will be loaded onto outbound trains, and the remaining full containers delivered to outside trucks for distribution. Conversely, full export containers and empty containers unloaded from the expanded intermodal rail area as well as full export containers and empty containers delivered to the terminal by outside trucks will be stored on the ground in container stacks located in the expanded yard area before being loaded from the Berth 4 wharf onto ocean-going container vessels.

DP4 operations are planned for efficiency and sustainability, while supporting quality well-paying jobs and community benefits.

The logistics of moving import and export containers through DP4 will consist of the following:

- Containers arrive and leave the terminal via large capacity container vessels which moor at the berth;
- Ship-to-shore container cranes, mounted on the berth rail system, pick up or store the container at any point on the vessel;
- Containers arriving at the berth are removed and stored for inspection and then sorted for either pick up on-site or loaded onto railcars or trucks within the terminal for onward transportation;
- Containers for export undergo a similar process involving offloading from truck, railcar and inspection and sorting before loading onto container vessels;
- Ongoing maintenance of the terminal and equipment and tug operations to support the berthing of vessels. Maintenance dredging of the existing dredge pocket has not been necessary at GCT Deltaport to date; and
- Tug assisted berthing and de-berthing of vessels.

Many of the existing operations, maintenance, safety and security functions in place at the existing GCT Deltaport facility now will be amended for the expanded Project area in compliance with all regulatory requirements, including the requirements of GCT's existing Environmental Management System (EMS). This system has been designed to capture, organize and manage vessel, rail, yard, gate, and maintenance operations so that environmental risks are controlled and environmental protection is integrated into daily terminal operations. The EMS is divided into several components, including:

- GCT's Environmental Policy;
- A list and hazard ranking of terminal and office (administrative) activities that have potential environmental impacts;

- Environmental Management System Procedures (EMSPs) to achieve environmental management policies;
- Specific Environmental Operating Procedures (EOPs) to ensure that activities are carried out in a systematic manner to avoid adverse impacts on the environment; and
- A list of forms that are completed by GCT staff and contractors to support the EMSPs and EOPs.

Operational activities of DP4 will be similar to existing operations and therefore the EMS will only require updates to cover the additional capacity and reconfiguration of some areas of the terminal. The GCT's EMSPs and EOPs are regularly reviewed and updated even without expansion.

Potable water will be supplied from the City of Delta's water system and distributed throughout the site for domestic supply to terminal buildings. Hydrants will also be located throughout the site for fire water supply. This system is currently operational at the existing GCT Deltaport and will be expanded to meet the additional needs of the Project.

Operational activities associated with short sea shipping are unknown at this time, as the market does not currently exist, as described in Section 3.3. As such, it is also not possible to define where short sea shipping terminals, and therefore routes, will be located, or predict the number of vessel movements that may or may not take place in the future.

### 3.4.3 Decommissioning

The Project will result in the creation of new land area. Project infrastructure will be designed for 100+ years of service life. Similar to GCT's other terminals, plans include ongoing maintenance, refurbishment and replacement to ensure the assets will continue to function in perpetuity. Therefore, there is no intention to decommission and abandon the Project. The land will remain in perpetuity and its future use will be subject to applicable permitting, regulatory requirements and lease conditions, such as removal of container handling equipment and returning the facility in good working order at the end of the lease, if not renewed.

### 3.4.4 Physical Activities Incidental to the Project

The Project will cause various operational phase activities that are incidental to the Project since they fall outside of GCT's care and control and are operated by third parties that are not directed by GCT. This includes the movement of container ships, short sea shipping barges and tugs, vessels associated with the Tsawwassen First Nation marina, and road and rail activities that take place outside of GCT's lease boundary. These activities are highly regulated by various federal and/or provincial authorities. Concerns have been raised through early engagement that these activities could result in adverse effects, including adverse cumulative effects. The BC EAO and IAAC will ultimately be responsible for defining the scope of the DP4 assessment.

Building on the preliminary study of shipping traffic Black Quay completed for GCT, and in collaboration with the local Indigenous nations who have expressed significant interest in better understanding expected marine traffic, GCT will conduct additional marine traffic studies. This may include an assessment of marine activities associated with marine shipping and the Tsawwassen First Nation marina. Offsite increased truck and rail traffic associated with Project operations may also be assessed (Figure 6). The BC EAO and IAAC will ultimately be responsible for defining the scope of the DP4 assessment.



## Marine Shipping

The independent study of demand for container capacity on the west coast of Canada commissioned by GCT (Black Quay Consulting 2021), included a preliminary study of vessel calls at the expanded GCT Deltaport, including DP4. The results are provided in Table 6. While DP4 will result in an increase in capacity of 2 million TEU per annum at GCT Deltaport, there will only be a small increase in the number of vessels calling. This is due to the expected increase in the size of vessels, which will be facilitated by GCT Deltaport’s four contiguous berths, and a greater proportion of containers loaded/unloaded at GCT Deltaport from each vessel. Currently, there are seven shipping services calling at GCT Deltaport each week. This is predicted to increase to eight following the construction of DP4. GCT Deltaport is currently able to handle vessels up to the size of Very Large Container Vessel (VLCV) but current vessels calling are predominantly Post-Panamax. It is expected by 2035, the mix of shipping service vessels is projected to be 75% New Panamax size and 25% VLCV size.

**Table 6: GCT Deltaport Vessel Calls and Size.**

Year	Smallest Vessel Size	Largest Vessel Size	Calls per annum
Current 2020	~4,500 TEU – Panamax	~18,000 TEU – VLCV*	364
DP4 at Capacity	~10,000 TEU – Post-Panamax	~18,000 TEU – ULCV	416

\* Berth 3 is capable of handling 18,000 TEU vessels under certain tide conditions. At present, there are no 18,000 TEU vessels calling in Vancouver. The largest ship to have called GCT Deltaport at this time is approximately 14,000 TEU.

For marine shipping of containers via international waters, the Impact Assessment may extend from GCT Deltaport through the international shipping lanes to Buoy J, which marks the western entrance to Juan de Fuca Strait from the Pacific Ocean (Figure 5). The assessment may include potential environmental effects of malfunctions or accidents and any cumulative environmental effects.

It is rare for container vessels to go to anchorage prior to arriving or departing GCT Deltaport. Occasionally a container vessel will anchor at one of the designed anchorages within the VFPA jurisdiction, for example to take on bunkers. Anchorages are predominantly used for bulk vessels waiting for cleaning or cargo at a terminal. As a result, new anchorages will not be required due to DP4 and the increase in use will be minimal. Anchorages are also outside of GCT’s care and control.

Figure 6: Container Transportation Routes.



- Legend**
- DP4 Project
  - Existing Rail Station
  - CP Rail (RBRC)
  - CNR Rail (RBRC)
  - Truck Routes (Common)

National Topographic System (NTS) map number: 092B14, 092G01, 092G02, 092G03, 092G06, 092G07, and 092G08



0 1 2 3 4 km  
 Scale: 1:250,000  
 Projection: NAD 1983 UTM Zone 10N

Data Sources:  
 a) DP4 Project, Hatfield 2021,  
 b) Rail and existing rail station, FLNRO 2020.  
 c) Roads, Digital Road Atlas 2013.  
 d) Topographic map, Esri Online Service.



### Truck and Rail Traffic

The Project will result in an increase in truck and rail traffic. GCT does not have care and control over the roads or rail outside of its lease boundary. However, GCT is already collaborating with municipal governments, Indigenous nations, the BC Ministry of Transport and Infrastructure, and the rail companies, amongst others, through the Gateway Transportation Collaboration Forum to confirm any improvements that may be required to the network as a result of the proposed container terminal expansion projects at Roberts Bank. GCT will continue this collaboration throughout the DP4 assessment process identifying Indigenous nations and local community concerns raised regarding access, potential impacts on surrounding agricultural lands and potential traffic and safety impacts through participation in the Gateway Transportation Collaboration Forum. GCT has not yet undertaken a detailed analysis of road and rail transportation requirements specifically for DP4. However, the Roberts Bank Trade Area (RBTA) study undertaken by the Gateway Transportation Collaboration Forum has examined road and rail traffic impacts from terminal expansions at Roberts Bank, including increased trade through GCT Deltaport Container Terminal and the Westshore Coal Terminal. Table 7 provides initial estimates of increased rail and road traffic for the Project.

**Table 7: Average Rail and Road Traffic Volumes to/from Roberts Bank Terminal. <sup>1</sup>**

Scenario	Rail movements per day	Truck movements per day	Other road movements per day
GCT Deltaport	8	3,500	2,000
Westshore (Delcan 2015)	13	N/A	350
<b>Total excl. DP4</b>	<b>21</b>	<b>3,500</b>	<b>2,350</b>
Estimated DP4	8	2,900	1,700
<b>Estimated Total</b>	<b>29</b>	<b>6,400</b>	<b>4,050</b>

DP4 is just one part of a larger and more complex network of infrastructure improvements intended to meet the Gateway Transportation Collaboration Forum’s goal of ensuring Vancouver is ready to manage growing trade. The Greater Vancouver Gateway 2030 Program is guided by the Government of Canada’s commitment to strengthen transportation corridors to increase trade and access to global markets. GCT is proposing to advance DP4 concurrently as infrastructure projects and studies are being advanced by the Greater Vancouver 2030 Program to expand existing off terminal road and rail infrastructure. Identification and mitigation of road, rail and other potential network constraints will be essential to the national supply chain, the local economy, and the quality of life for residents who live along the transportation corridor.

<sup>1</sup> Information in Table 7 is derived from the 2015 RBT2 Environmental Impact Statement (Appendix 4-D of the Roberts Bank Traffic Data Matrix). The actual table numbers have been adjusted to reflect to the lower capacity of 2.0 million TEUs for the DP4 Project compared to 2.4 million TEU for RBT2 and the current traffic volumes to/from GCT Deltaport. The increase in throughput and associated traffic can be accommodated through the addition of one berth, due to efficiencies of expanding an existing terminal.

Furthermore, as the VFPA pre-funds and collects [the Gateway Infrastructure Fee](#) from the terminal operators, GCT is already contributing towards the following projects that improve road and rail traffic [announced in March of 2017](#):

#### **Highway 91/Nordel Way Interchange**

- Construction of two new two-lane off-ramps for Highway 91 traffic into Surrey;
- Construction of 4.9 kilometres in new acceleration and deceleration lanes;
- Construction of a two-lane overpass on Nordel Way for westbound traffic over Highway 91 that will parallel the existing overpass.

#### **Highway 91 Connector /Nordel Way Intersection**

- Removal of the current signalized intersection that connects Nordel Way North and the Highway 91 Connector, as well as the construction of a new, grade-separated intersection and overpass further north of the existing one;
- Construction of 3.2 kilometres in new lanes for access roads and ramps;
- Construction of a new intersection on Highway 91 Connector that features access-management improvements such as right in/right out turning lanes; and
- Improved access to the Commercial Vehicle Safety and Enforcement weigh scale and Nordel overnight truck parking area.

#### **Highway 91 Connector/Highway 17/River Road (Sunbury) Interchange**

- Construction of a new interchange replacing the existing traffic signal at Highway 17 and Highway 91 Connector;
- Removal of the signalized railway crossing on 96 street connection over the Burlington Northern and Santa Fe (BNSF) rail tracks;
- Construction of 5.6 kilometres in new lanes for ramps and municipal connector roads (multi-lane); and
- Construction of three new overpass structures: Highway 91 Connector going over Highway 17, as well as eastbound and westbound lanes of Highway 17 going over the BNSF Railway track.

#### **Highway 17 at 80th Street (Tilbury) Intersection Upgrade**

- Replace a right turn with a westbound highway on-ramp.

#### **Deltaport Way/27B Avenue Improvements**

Under the funding agreement, the governments of Canada and BC, the Tsawwassen First Nation, and the VFPA on behalf of the industry, are collectively contributing up to CAD 245 million. Of this, the federal government will contribute up to a maximum of CAD 82 million for these projects. The Government of BC is contributing approximately CAD 80 million. The Tsawwassen First Nation is contributing CAD 5.2 million. The VFPA is contributing ~CAD 8 million and the remaining ~CAD 70 million is a contribution from the industry in the RBTA, including GCT and its customers, via the Gateway Infrastructure Fee. Additional information on estimated truck and rail traffic associated with the Project will be provided during the assessment process once additional analysis is completed.

CP and CN are the two railway companies that service Deltaport for inbound and outbound international container trains. All international container trains destined to/from Deltaport travel along the 70-km Roberts Bank Rail Corridor (RBRC) that connects with the North American rail network and is a critical link between Canadian industry and Asia-Pacific economies. The RBRC traverses five Greater Vancouver municipalities and crosses several at-grade public roads. The RBRC connects with both the CP and CN mainlines where both railways use their respective lines to move container trains across Canada into Central Canada, Ontario and Quebec as well into the US Midwest to destinations like Chicago, Minneapolis and Detroit.

Truck traffic leaving/arriving at Deltaport uses Highway 17 and then branches off onto other lower mainland roads to their final destination or collection points. Typically, traffic routes will take trucks throughout the lower mainland and depending on their destination, trucks will use Highways 17, 99, 91, 10 and 1. Traffic destined to the USA will utilize Highway 17 to 99 and then to the USA border. Trucks moving containers to other parts of BC or other provinces will typically utilize Highway 17 to Highway 1 eastbound to their destinations. Figure 6 provides an overview of road and rail container shipping routes associated with Deltaport.

### ***Short Sea Shipping***

The construction of infrastructure to support a potential short sea shipping berth within DP4 would introduce short sea shipping to and from GCT Deltaport. Currently, the only two active examples of short sea shipping container service in the region are from DPW Centerm in Burrard Inlet to/from the DPW Duke Point Terminal (Port of Nanaimo), due to the fact that under prevailing conditions, the movement of containers by short sea shipping is not competitive with transportation by truck. DPW has also recently trialed a short sea shipping run between their DPW Fraser Surrey Docks located on the Fraser River to DPW Centerm in the inner harbour of Vancouver. GCT is pursuing a Project design that may accommodate a future short sea shipping berth in anticipation that governments may mandate alternatives to trucking in the future, or dynamics in the market may change. To GCT's knowledge, no other short sea shipping services are currently being planned outside of GCT Deltaport. As such, it is not possible at this stage to ascertain if, when or where such facilities outside of GCT Deltaport would be constructed. It is therefore impossible to make predictions about the volumes of marine traffic associated with short sea shipping, or shipping routes, which are not clearly defined unlike shipping routes for traditional container vessels.

If plans for off-terminal short sea shipping facilities are progressed during the Impact Assessment, it may be possible to define vessel operational requirements associated with barging to that facility, and incorporate them into the Project assessment at that time.

If it is determined that short sea shipping capability is not required, the terminal footprint would remain the same, and the area would be used for other terminal operations, such as container storage and/or the (un)loading of container trucks. The inclusion of the short sea shipping berth in the Project design makes little difference to the design because the bulkhead is required for the terminal expansion regardless. Construction techniques would also be similar, with the exception of a slightly larger dredge footprint of approximately 3 ha to accommodate the safe movement of short sea shipping vessels.

## Habitat Offsetting

The Project will require an authorization under the *Fisheries Act*, which will require the development of habitat offsetting. Through the Project Assessment and subsequent permitting, the extent of habitat offsetting required and the offsetting projects to meet this requirement will be determined. GCT has undertaken an initial review of habitat offsetting options. GCT will be undertaking further engagement with Indigenous nations, regulators and other groups on offsetting measures, including on the development of offsetting plans. The habitat offsetting may be developed as part of the Project or as a separate project, depending on the location, and delivery model of the offsetting, for example it may be off-site and/or developed in collaboration with Indigenous nations and/or a third-party with funding from GCT.

### 3.5 Project Timing

A detailed schedule will be provided as the Project progresses through detailed design and the assessment process.

#### 3.5.1 Project Schedule

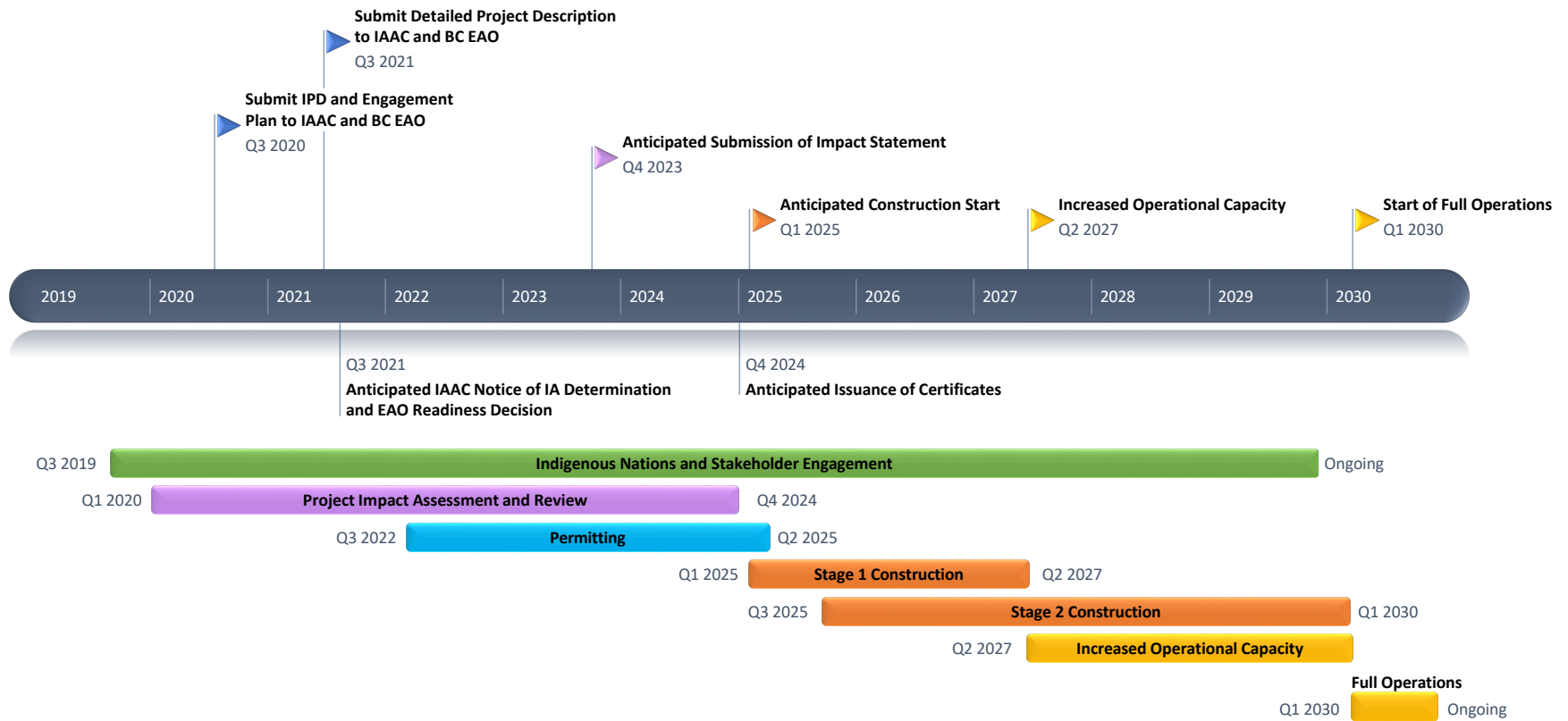
The Project will consist of three key phases with preliminary durations outlined in Table 8. There are no plans to decommission or abandon the Project as the land will remain in perpetuity and its future use will be subject to applicable permitting and regulatory requirements, consistent with other similar infrastructure development projects.

**Table 8: Project Phases.**

Project Phase	Preliminary Duration
Construction (Stage 1)	2-3 years
Construction (Stage 2)	4-5 years overlapping construction of stage 1
Operations	Ongoing

Figure 7 provides the preliminary schedule for the Project. This schedule includes milestones for the submission of key Impact Assessment and permitting deliverables and is subject to change based on Federal and Provincial regulatory timelines and engagement with Indigenous nations. Constraints such as activity-based timing windows to protect fish, birds and marine mammals may also influence the schedule, such as Fisheries and Oceans Canada’s (DFO) least risk window for the area covering Roberts Bank which runs from August 16 to February 28. GCT is aware of sensitive life history windows related to other biota (e.g., salmon outmigration in spring, Dungeness crab settlement in summer, shorebird migration in late summer and spring), which will be investigated during the Assessment. Mitigation measures related to the timing of various construction activities to avoid these sensitive life stages will be developed through the Impact Assessment and permitting processes. Indigenous knowledge will also be incorporated into the project schedule, including with the determination of mitigation measures for timing windows related to cultural practices. Further discussions with Indigenous groups through the Impact Assessment and permitting processes will help inform the construction schedule, including identifying sensitive timing windows.

**Figure 7: Preliminary Project Schedule.**



### 3.6 Project Capital Costs

The preliminary capital cost estimate for the Project is up to CAD 1.60 billion in capital and construction expenditures. This estimate will be refined during the Project's development and final design and is expected to generate significant economic benefits in the Metro Vancouver region, the province of BC, and Canada, as stated in Section 1.3.3.

The capital cost estimate of CAD 1.60 billion includes the construction costs and expenses for project components such as the container handling and storage area, marine berth, intermodal rail yard expansion and offices and buildings. As stated in Section 3.4.3, GCT has no plans to decommission the Project, as a result, no decommissioning costs are included in the DPD.

### 3.7 Project Workforce

Health Canada had deemed port workers to be essential service providers due to the role that the movement of containerized goods has in the economic welfare of Canada. Both the World Health Organization and Health Canada expect that with the implementation of ongoing vaccination programs, the pandemic can be managed. GCT does not expect the pandemic to have any negative effect on trade once the Project is completed and operational. The Project workforce is not expected to be affected by COVID-19.

Based on GCT's existing operations and future anticipated GCT Deltaport operations, the following workforce is anticipated for the Project.

#### 3.7.1 Construction Workforce

The Project construction workforce is estimated at 10,000 FTE jobs in Canada, consisting of direct employment of 4,700 FTEs in BC., indirect and induced employment of 3,700 FTEs in BC and indirect and induced employment of 1,600 FTEs in the rest of Canada over the approximately 4 years of construction.

GCT will hire multiple contractors to complete the construction of the Project. Each contractor will be responsible for defined areas of work at various phases throughout the Project. Contractors would furnish specialized equipment and skilled labour to perform different construction activities. Construction trades common to heavy civil work would be employed by these contractors on an as-needed basis to meet daily and peak workforce requirements.

#### 3.7.2 Operational Workforce

Project operation is expected to require an increase in the current GCT Deltaport staff and International Longshoremen's and Warehousemen's Union (ILWU) workforce of approximately 1,000 additional permanent jobs when at capacity.

In 2018, GCT paid an estimated CAD 300 million towards annual wages and benefits and this is projected to triple by the time DP4 is operating at its additional capacity.



### 3.7.3 Workforce Environment

GCT's goal will be to employ as many local people as possible during Project construction and operations. For construction, GCT will work with Project contractors to ensure a diverse and local workforce is employed. For operations, given that much of the existing ILWU workforce live south of the Fraser River, GCT will consult with the ILWU during the Project design and the resulting operations workforce. Based on information from the BC Maritime Employers Association, a total of 2,126 longshore workers currently live south of the Fraser River, with the highest percentages residing in Surrey (55%) and Delta (18%). GCT is committed to continuing to work closely with and consulting the ILWU on future operations, similar to previous terminal expansion projects.

GCT is also committed to diversity, equity and inclusion within our staff and will provide new employees training such as cultural sensitivity and awareness training during their onboarding program. This type of training will foster greater diversity in our company and lead to better protection for all employees, including women, visible minorities, LGBTQIA2+, and persons with disabilities.

### 3.8 Alternatives to the Project

GCT is committed to playing a key role in meeting the expected demands for container capacity, as discussed in Section 1.3.2. GCT has reviewed the alternatives to support the continued growth in capacity to meet this requirement.

Based on GCT's analysis, there are limited alternatives to DP4 due to the following factors:

- Terminals on the Fraser River have limited growth capacity as they cannot accommodate Post-Panamax and larger container vessels, because they cannot safely navigate the river; and
- Road and rail connections to terminals on the north shore of Burrard Inlet are not adequate to handle container volumes.

GCT considered a further expansion at the GCT Vanterm terminal in Burrard Inlet. However, GCT has undertaken additional analysis and determined that DP4 is preferable, for similar reasons of accessibility to those cited above, in addition to consideration of the limitation on vessel size imposed by the Lions Gate Bridge and increased tanker traffic from the Westridge Terminal, and has therefore now focused its efforts on DP4. Based on this assessment and professional judgement, the expansion of GCT Deltaport or the development of a new terminal are the only technically and economically feasible alternatives to meet Project's need and achieve its purpose described in Section 1.3.1.

GCT considered a further expansion of the GCT Deltaport terminal at Roberts Bank on the west side of the causeway as an expansion of the existing terminal. However, GCT rejected this alternative location for numerous reasons.

- A potential expansion on the west side of the causeway contiguous to the existing terminal would marginalize full utilization of existing terminal infrastructure concentrated on the east side of the causeway and inhibit full operational efficiency of the expanded footprint resulting in a lower density of container storage on a larger terminal footprint;
- Developing a fourth berth on the west side of the causeway contiguous to the existing terminal would require duplicative ship to shore cranes and other CHE which would have a lower utilization and potentially higher emissions than by co-locating a fourth berth on the east side of the causeway as an extension of the Third Berth;
- Developing a fourth berth on the west side of the causeway continuous to the existing terminal would require substantially more volume of dredging to develop a deep draft channel to serve the fourth berth. Co-locating

a fourth berth on the east side of the causeway as an extension of the Third Berth reduces the volume of dredging required by extending the existing deep draft channel currently used to access berths 1, 2, and 3; and

- Avoiding adverse impacts to biofilm which has historically been shown to have higher densities on the west side of the causeway by the expansion of the existing terminal on the east side of the causeway.

The VFPA is proposing the construction of the RBT2 which has a planned capacity of 2.4 million TEU per annum. The proposed RBT2 project could meet the predicted demand in container capacity should it receive approvals, establish a sustainable business case, obtain governmental borrowing limit increase, and identify a terminal operator. However, GCT believes that DP4 can achieve a similar increase in capacity through expansion of the existing berth, compared to the new construction of three berths for RBT2, and approximately 56 ha of land reclamation: one-third the size of RBT2. Even with the dredging footprint that will be required, DP4, as proposed, will have a much smaller footprint. DP4 is an efficient and effective use of the existing GCT Deltaport infrastructure that provides the fullest optimization of the entire port complex. GCT believes that the Project location and design will result in a lower overall impact on the environment and provide more cost-competitive capacity compared to RBT2. Therefore, GCT is advancing the DP4 project pursuant to assessments that it can be the first to address market demands through a more sustainable and financially viable project. If RBT2 obtains environmental and other regulatory approvals, and the VFPA subsequently: (1) obtains approval from the Federal Government to increase its borrowing limits, (2) establishes a sustainable business case, and (3) contracts with a terminal operator, then GCT will evaluate the business case for DP4 at each such event and proceed accordingly.

### 3.9 Alternative Means of Carrying out the Project

Further to the Project updates and changes described in Section 3.1, this section provides an update to the alternative means of carrying out the Project to address DPD information requirements and those associated with ECCC's Strategic Assessment of Climate Change. The following factors were considered when analyzing alternatives during the development of the design for DP4:

- Use of Best Achievable Technologies;
- Technical feasibility;
- Economic feasibility; and
- Potential effects, risks, and uncertainties of alternatives.

The Project design was informed in part by the analysis of alternatives that was prepared for the DP3 environmental assessment and historical marine terminal development at Roberts Bank, and elsewhere in BC, since the 1950s. A detailed analysis of alternative means of carrying out the project will be prepared specifically for DP4, once further engagement and baseline study has taken place, as part of the Project's assessment.

The technical and economic feasibility of the terminal configuration and construction methods employed are driven by physical location, water depth, geotechnical and seismic considerations, and operability. These are all inextricably linked to the environmental constraints and mitigations that will be implemented. Project designs have benefitted from an increased understanding of site conditions, including soils and their behaviour during seismic events. Existing biophysical studies and local and IK also have identified environmental constraints, issues, and increased understanding of effective mitigations.

Identification of alternative means of carrying out the Project was discussed through early engagement with Indigenous nations, government agencies, and community stakeholders. In particular, engagement with Tsawwassen First Nation regarding the initial design of the Project resulted in the inclusion of a marina on the east side of the causeway for which Tsawwassen First Nation could launch fishing and crabbing vessels and other watercraft. Studies indicated that the east side of the causeway would have lower impacts on no float zones at Roberts Bank, and on the crab fishery, compared to project locations to the west of the causeway in deeper water.

Specific feedback from stakeholders such as Bird Studies Canada, the Boundary Bay Conservation Committee and Fraser Voices highlighted the need to consider the alternative design of night-time lighting from the terminal to minimize the impact on bird populations. By leveraging existing light-emitting diode (LED) lighting infrastructure and the expansion of the existing terminal instead of a separate terminal, GCT light pollution may be reduced. Minimizing construction on the west side of the causeway was also important for these groups to limit the impact on biofilm in the region.

Alternative means of carrying out the Project considered within the Project design process include:

- Marine terminal orientation and configuration of container storage and handling area;
- Construction methodology;
- Intermodal rail yard configuration;
- Dredge pocket configuration for the deep water access channel extension for Berth 4 and the shallow water access channel for configuration of the short sea shipping berth, tug basin, and marina; and
- Mode of operations.

### ***Orientation and Configuration of Container Storage and Handling Area***

Due to the configuration of the existing GCT Deltaport terminal, the neighbouring Westshore coal terminal and the existing dredge pocket, the only option for DP4 that is believed to be technically and economically feasible is to expand the terminal north (towards the shore) along the existing causeway by maintaining a continuous linear berth. The northern limit was adjusted to correspond to the proposed transference of the water lot on the east side of the existing causeway associated with the Property Identifier (PID) 029-139-759 to Tsawwassen First Nation.

GCT has investigated expansion seaward into the neighbouring Westshore terminal. This is a multi-user coal loading facility that serves Canadian and U.S. shippers of metallurgical and thermal coal. The terminal began operating in 1970 and Westshore owns all of the facilities, upgrades and operating equipment at the terminal and has an existing property lease with the VFPA with options that extend to 2066. Westshore is a very strong and viable business that handles approximately 30 million tonnes per year and has made a significant capital investment over recent years. In addition, there would need to be substantial upgrades to the terminal to support the storage and transportation of containers due to the loads created by the stacking and density of containers. It is therefore not a feasible alternative at this time.

GCT continues to assess the Best Achievable Technologies for container storage and handling configuration to maximize terminal operating efficiency. This includes the stacking of containers and maintaining a continuous linear berth for efficiency.

### ***Construction Methodology***

Three alternative methodologies were reviewed during the design process for the construction of the terminal:

- A mass gravity wall using precast concrete caissons (caisson);
- A revetment slope with pile and deck structure (pile and deck); or
- A bulkhead wall of cylindrical and sheet piles (bulkhead wall).

Due to the deep layer of soft sediments in the area, piles need to be driven a significant depth below the seabed and ground improvements are required to meet geotechnical and seismic requirements. As a result of this and the heavy marine equipment required for installation, the cost of the pile and deck and bulkhead wall options, which both have steel piles as their primary structural support, will be higher than the caisson method and might be economically unfeasible. This was found to be the case for DP3, but further investigation is required for DP4. There are also advantages of the caisson method in terms of reliability during and after an earthquake. The caisson method has been proven to be economically and technically feasible on multiple occasions at this site and within the BC region.

From an environmental perspective, there are advantages and disadvantages to the alternatives. For example, the caisson method requires additional dredging but avoids pile driving and has a relatively short construction duration on-site. These environmental considerations will be at the core of the analysis of alternative means presented in the Impact Assessment and will incorporate feedback received during engagement and consultation.

### ***Intermodal Rail Yard Configuration***

The Project design includes an expansion of the existing intermodal rail yard along the west side of the causeway by maintaining a continuous linear alignment. GCT is aiming to minimize expansion to the west of the causeway due to environmental concerns expressed by local community-based environmental organizations, in particular as it relates to shorebirds and biofilm. However, alternatives were reviewed and given the current configuration of the linear orientation of the existing rail yard at GCT Deltaport, it is not expected to be technically or economically feasible to avoid extending the intermodal rail yard to the west of the causeway. This will be assessed further through the analysis of alternatives in the Impact Assessment and later phases of engineering design and further engagement with local environmental organizations and Indigenous nations.

Although outside the care and control of GCT, there is potential for off-site upgrades to the railway to affect the Agricultural Land Reserve (ALR), specifically the Provincial ALR Option Lands recently purchased by the VFPA along Deltaport Way that have already been designated for a future rail right-of-way. The rail upgrades required to support DP4 have not yet been assessed. GCT will continue to liaise with the rail companies, who would be responsible for the environmental assessment, construction and operation of any upgrades. Considerations for upgrades and feedback provided to GCT regarding these off-site upgrades will be provided to the rail companies.

### ***Deep Water Access Channel Extension for Berth 4***

Dredging to extend the deep water access channel is required to support construction activities and enable ships to access the expanded terminal. The orientation of the dredge pocket is driven by the berth configuration and the existing dredge channel servicing berths 1 to 3. As a result, no other technically- or economically-feasible alternatives for the orientation of the dredge pocket were identified during the development of the Project design.

The Project design minimizes the dredge footprint and therefore minimizes the total dredge volume. However, the depth of the dredge pocket is driven by vessel draft and under keel clearance requirements, the width by safe berthing procedures and the clearance required by ships entering and exiting the terminal. GCT will undertake a detailed assessment, working with Indigenous nations, regulators and stakeholders, including the BC Pilotage Authority, to minimize the dredging required. There is no requirement for a turning basin at GCT Deltaport, which reduces the size of the dredge pocket required.

### ***Shallow Water Access Channel for Short Sea Shipping Berth, Tug Basin and Marina***

Alternatives for the location of the short sea shipping berth, tug basin and marina are limited at the site. To minimize the additional marine structures required, the Project design has these located along the north face of the proposed container storage and handling expansion, but outside of the water lot on the east side of the existing causeway associated with PID 029-139-759 that is proposed for transfer to Tsawwassen First Nation. This requires additional dredging of a shallow water access channel to provide access, but to a shallower depth than the deep water access channel to Berth 4. The short sea shipping berth infrastructure would be constructed with lower height caisson structures founded at shallower depths than the caisson structured proposed for Berth 4. Revetments protected with armour stone would be placed along the remainder of this northern boundary.

If it is determined that short sea shipping is not economically viable, the terminal footprint and construction techniques would remain the same, as the area would be required for container storage expansion and the increase in the transfer of containers between ocean-going vessels and inland road transportation. However, there could be a reduction in the dredge footprint, if the Short Sea Shipping berth is not required. An initial estimate for the reduction in dredge footprint is approximately 3 ha but this would depend on the reconfiguration of the Tsawwassen First Nation marina and the tug basin. The lower-height caissons structures in the area of the short sea shipping berth would also not be required and would be replaced by extending the revetments protected with armour stone along the entire northern boundary. No other technical and economically feasible alternatives have been identified during Project design, but this will be evaluated further through engagement, the Impact Assessment, and later phases of engineering design.

### ***Mode of Operation***

There are multiple alternatives relating to the mode of operations. The starting point is to operate DP4 consistent with the current GCT Deltaport, which is partially semi-automated with fully electric-powered cranes and with shore power available at Berth 3 to provide electrical power to a ship while it's docked, thereby allowing auxiliary engines to be turned off and the burning of diesel fuel to cease. GCT is evaluating alternatives to reduce environmental effects, including Best Achievable Technologies to minimize GHGs and other emissions and will continue to work closely and consult with ILWU on modes of operation.

## 4 LAND AND WATER USE

### 4.1 Land Ownership and Tenures

GCT Deltaport is within the City of Delta. The proposed DP4 expansion is approximately 3 km southwest of Tsawwassen First Nation Lands and 2 km north of the international border with the USA.

GCT holds a long-term lease arrangement with VFPA for the GCT Deltaport terminal.

The DP4 Project will be within federal lands and waters. Based on the current Project design, the required dredging may extend into provincial aquatic crown land which is designated as a provincial WMA (as shown in Figure 8). Distances to Indigenous nations' reserves are provided in Section 8.3. Other terrestrial federal lands, consisting of national parks, in the vicinity of the Project and associated marine shipping route are identified in Figure 4, Figure 5 and Figure 8.

The Tsawwassen First Nation currently holds a 99-year agreement to lease two water lots that lie on either side of the Tsawwassen Ferry Terminal causeway and include a total area of approximately 456 ha, as set out under the Tsawwassen First Nation Final Agreement. The required dredging may extend into one of these Tsawwassen First Nation water lot leases.

The federal lands are purported to be managed lands by the VFPA and within their purported navigational jurisdiction.<sup>1</sup> Under section 44(6) of the *Canada Marine Act*, a port authority may manage, occupy or hold only the real property and immovables set out in its letters patent. There is no exclusion with respect to section 44(6). PID number 029-139-759 which underlies a significant portion of the DP4 Project is not listed in the letters patent.

Tsawwassen First Nation has entered into a Memorandum of Agreement with the VFPA<sup>2</sup>, which would provide Tsawwassen First Nation with additional water lots on either side of the Roberts Bank Causeway. If granted, DP4 may extend into one of these water lots.

Activities associated with the expansion of the intermodal railyard will extend into land on the causeway that is held by the BC Railway Company and potentially Tsawwassen First Nation industrial lands.

No existing seasonal or temporary residences are located in the vicinity of the Project, such as seasonal trappers' cabins, wilderness resorts or housing for seasonal farmworkers (Section 6.4). As the Project proceeds, information will be updated if such residences are identified.

A general overview of land ownership and tenures in the Project area is summarized in Table 9 and shown in Figure 8.

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<sup>1</sup> The VFPA's administrative, permitting and other powers with respect to the DP4 Project, including those related to port operations, are currently the subject of judicial review.

<sup>2</sup> CEAR DOC 1995, TFN, and VPA Roberts Bank Development, Memorandum of Agreement

<sup>2</sup> CEAR DOC 1995, TFN, and VPA Roberts Bank Development, Memorandum of Agreement.

**Table 9: Land Ownership and Tenure.**

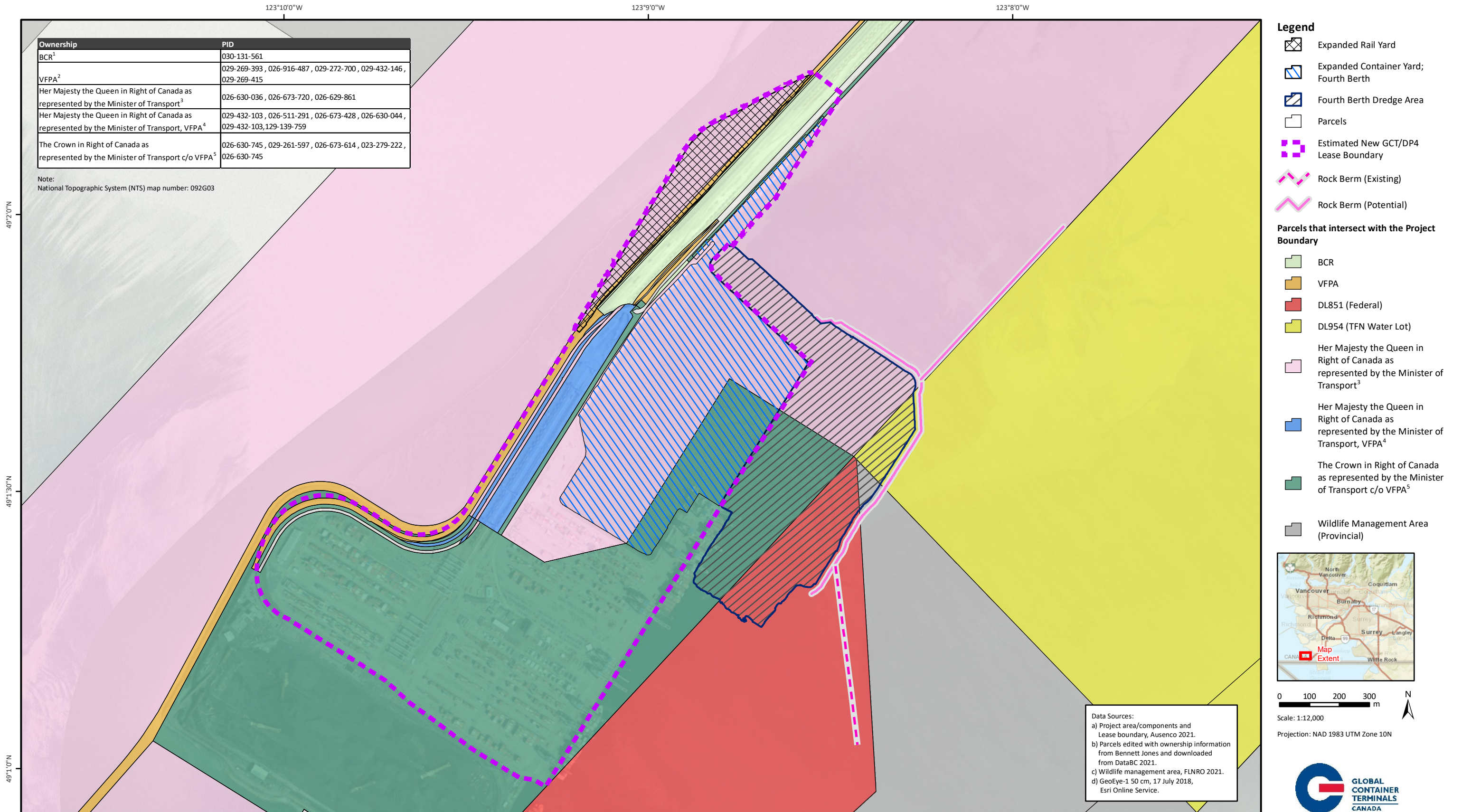
Registered Owner	PID	Parcel Class	Legal Description/District Lot
Crown Agency (Crown/Minister of Transport c/o VFPA)	023-279-222	Subdivision	Lot A, Except Portions in Plan BCP22579, Bed of the Strait of Georgia Group 2 New Westminister District Plan LMP25402 Except Plan EPP32975 Legal notations and encumbrances currently on title: Annexed Easement BA378186 over Parcel M Plan BCP23856 SRW BJ296338 (Corporation of Delta) Possibility of Reverter BJ296345 (Federal Crown and transferred to BC Rail) Easement BA378187
Crown Agency (Crown/Minister of Transport c/o VFPA)	029-139-759	Subdivision	Lot 1 of the Bed of Georgia Strait Group 2 New Westminister District Plan EPP28116 Legal notations and encumbrances currently on title: Title may be affected by Permit under part 29 of <i>Municipal Act</i> , BJ258329 SRW G99253 BC Hydro
Crown Agency (Crown/Minister of Transport c/o VFPA)	026-630-745	Subdivision	Parcel A, Except: Part in Parcel B (PlanBCP27391); Bed of the Strait of Georgia Group 2 New Westminister District Plan BCP22581 Legal notations and encumbrances currently on title: Right of Entry BB501289 (Federal Crown)
VFPA	029-272-700	Subdivision	Lot C Bed of the Strait of Georgia Group 2 New Westminister District Plan EPP32972 Except Plan EPP64031 Legal notations and encumbrances currently on title: SRW CA6656283 (BC Rail)
BCR	030-131-561	Subdivision	Lot D Bed of the Strait of Georgia Group 2 New Westminister District Plan EPP64031 Legal notations and encumbrances currently on title: SRW CA6656285 (VFPA)
Crown Waters	-	-	Roberts Bank WMA. Plan 12 Tube 1993.

DP4 is an expansion of an existing terminal and therefore components and activities of the Project will overlap with existing use for port-related activities, including the existing dredge pocket. The remainder and much of the DP4 footprint is within the natural undeveloped foreshore that has been used for fishing and other marine activities.

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**Figure 8: Land Ownership and Tenures.**



## 4.2 Planning Context and Zoning

DP4 is contained within Planning Area 6 (Roberts Banks) of the VFPA's Land Use Plan. The VFPA's Land Use Plan designates the Roberts Bank terminal for use as a Port Terminal (Port Metro Vancouver 2014). Typically, each year, to satisfy the intent of the *Canada Marine Act*, the VFPA produces yearly amendments to the Land Use Plan to update any acquired or divested land and designations of such land. The overall Land Use Plan is currently being updated as part of a five-year review and based on feedback from engagement conducted in 2019. An updated draft of the VFPA's Land Use Plan was provided for the second phase of engagement in December 2020.

The proposed DP4 expansion falls within the Roberts Bank area and is designated for Port Terminal land use. The VFPA has stated that in planning for future capacity within the guidelines of the Land Use Plan, one of the principles includes increasing the capacity and efficiency of existing container terminals. DP4 meets this principle.

The existing GCT Deltaport and therefore a portion of the area planned for DP4 is designated as Industrial under the Metro Vancouver Regional Growth Strategy, titled Metro 2040 Shaping our Future (Metro Vancouver 2017). The remaining area of DP4 is not designated within the strategy. Tidal flats and wetlands are identified as natural features in the area. Similarly, much of DP4 would fall within land designated industrial within the City of Delta Official Community Plan, with the remainder not designated (The Corporation of Delta 2019). These plans are consistent with the objective to preserve industrial lands, while supporting sustainable transportation choices and protecting and enhancing natural features and their connectivity.

The Tsawwassen First Nation Land Use Plan covers the water lots that are under lease or Memorandum of Agreement to Tsawwassen First Nation as described in Section 4.1. It describes the importance of the tidal marsh and water lots to Tsawwassen First Nation, for traditional and recreational use, and to wildlife (AECOM 2009).

GCT is aware that other land use plans relevant to the Project area may exist and if any additional relevant land use plans become aware to GCT in the future they will continue to engage with Indigenous nations and others to better understand how they can be incorporated into the Impact Assessment.

## 4.3 Proximity to Parks and Protected Areas

Table 10 describes the proximity of the Project to parks and protected areas. Approximate distances have been calculated as a direct line map distance from the Project to the nearest border of the park or protected area. The Project does not overlap with any lands outside of BC or Canada.

**Table 10: Parks and Protected Areas Located Within the Vicinity of the Project.**

Parks and Protected Areas	Approximate Distance to DP4 (km)	Location Description
Regional Parks		
Boundary Bay Regional Park	7	Located in Delta, BC.
Deas Island Regional Park	10	Located in Delta, BC.
Burns Bog Ecological Conservancy Area	14	Located in Delta, BC.

**Table 10: (Cont'd.)**

Parks and Protected Areas	Approximate Distance to DP4 (km)	Location Description
<b>Wildlife Management Areas<sup>1</sup></b>		
Roberts Bank Wildlife Management Area (WMA)	0.3	The tip of the WMA is located approximately 300 m from the new berth face and may be overlapped by dredging activities pending finalization of the Project design.
Boundary Bay WMA	9	Located east of the Project Area.
South Arm Marshes WMA	9	Located north of the Project Area, within the Fraser River.
Sturgeon Bank WMA	13	Located north of the Project Area, in the Fraser River Estuary.
<b>Federally Protected Areas</b>		
Fraser River Estuary Important Bird Area (IBA)	<1	This IBA <sup>2</sup> encompasses private and public land and overlaps with legally protected sites in the region.
Fraser River Delta	9	A 20,682 ha Ramsar Site <sup>3</sup> formed by six components (Burns Bog, Sturgeon Bank, South Arm Marshes, Boundary Bay, Serpentine and the Alaksen Ramsar Site).
Alaksen National Wildlife Area	9	Located on Westham Island and designated as an IBA and a Ramsar Site. Also located within the Fraser River Estuary Western Shorebird Reserve Network Site.
Western Hemispheric Shorebird Reserve Network	<1	31,648 ha within the Fraser River Estuary. The Western Hemispheric Shorebird Reserve Network designation applies to the intertidal portions of the entire Fraser River Estuary and upriver to the South Arm marshes.
George C. Reifel Migratory Bird Sanctuary	8	Overlaps with the Alaskan National Wildlife Area and part of the Fraser River Estuary Western Shorebird Reserve network.
SRKW critical habitat <sup>4</sup>	<1	The southern Strait of Georgia.

<sup>1</sup> Established to conserve critical and internationally significant habitat for fish, marine mammals, and migrating birds.

<sup>2</sup> Designated by Birdlife International.

<sup>3</sup> Designated under the Ramsar Convention.

<sup>4</sup> The critical habitat of southern resident killer whales within Canadian waters meets the definition of critical habitat as described in the Species at Risk Act.

## 5 REGULATORY CONTEXT

### 5.1 Permits, Licenses, Approvals, and Authorizations

Federal and provincial permits, approvals and authorizations will be required for this Project as presented in Table 11. Table 11 is not intended to be an exhaustive list of Project permits. Permit requirements will be confirmed throughout the Impact Assessment process, in relation to Project design, construction and operational requirements and in consultation with regulatory authorities. As discussed in Section 1.4, the Project may require reviews and potential permits or certificates under both the federal IAA and the BCEAA.

**Table 11: Anticipated Key Permits and Approvals.**

Permit	Legislation	Regulator	Trigger(s)
<b>Federal</b>			
Impact Assessment Decision Statement	IAA	IAAC	Required for projects that exceed thresholds in the Physical Activities Regulation
<i>Fisheries Act</i> Authorization	<i>Fisheries Act</i>	DFO	An authorization is required if the Project will result in the harmful alteration, disruption or destruction of fish habitat or death of fish.
Agreement or permit authorizing an activity affecting listed wildlife species, any part of its critical habitat or the residences of its individuals	<i>Species at Risk Act</i>	DFO	Project within SRKW critical habitat.
Navigable Waters Approval	<i>Canadian Navigable Waters Act</i>	Transport Canada	For works that take place within navigable waters that do not meet works established under the Minor Works Order and which may interfere with navigation.
Disposal at Sea Permit	<i>Canadian Environmental Protection Act</i> ; Disposal at Sea Regulations	ECCC	For disposal at sea of dredged material, if it cannot be reused.
Amendment to Existing Lease Agreement	<i>Canada Marine Act</i>	VFPA <sup>1</sup>	Updated Operational Lease Agreement for works covered under the VFPA managed federal lands and water.

<sup>1</sup> The VFPA's administrative, permitting and other powers with respect to the DP4 Project, including those related to port operations, are currently the subject of judicial review.

**Table 11: (Cont'd.)**

Permit	Legislation	Regulator	Trigger(s)
<b>Federal (Cont'd.)</b>			
Radio License	<i>Radio Communication Act</i>	Industry Canada	Required for use of radio frequencies and communication use/methods
Project and Environmental Review Permit	<i>Canada Marine Act</i> <i>Impact Assessment Act</i>	VFPA <sup>1</sup>	Works and activities on federal lands and waters within the VFPA managed federal lands and water. Potentially required for field investigations and the Project.
<b>Provincial</b>			
Environmental Assessment Certificate	BCEAA	BCEAO	Required for projects that exceed thresholds stated in the Reviewable Project Regulations
Wildlife Management Area Authorization	<i>Wildlife Act</i>	Ministry of Forests, Lands, Natural Resource Operations and Rural Development (FLNRORD)	For use of land within a WMA.
License/Lease Agreement	<i>Land Act</i>	FLNRORD	Potential license for field investigations, if within provincial crown land. Lease for expansion of terminal into provincial crown land.
Heritage Inspection Permit	<i>Heritage Conservation Act</i>	FLNRORD	If an Archaeological Overview Assessment (AOA) for the Project during the Impact Assessment phase identifies further archaeological assessment is required, the heritage inspection permit will be required. It is not anticipated at this time but if a known archaeological site cannot be avoided by the Project, an investigation and alteration permit would be required for construction.
Amendment to Waste Discharge Permit (Water)	<i>Environmental Management Act</i>	BC Ministry of Environment	Required to discharge waste into the environment

In addition, Metro Vancouver has delegated authority under the BC *Environmental Management Act* to regulate and enforce air quality emissions within the airshed.

<sup>1</sup> The VFPA’s administrative, permitting and other powers with respect to the DP4 Project, including those related to port operations, are currently the subject of judicial review.

Various Indigenous nations may also have protocols for archaeological investigations conducted in their territory. Identification of the protocols required for archaeological investigations in the Project footprint will be confirmed through ongoing engagement with identified Indigenous nations. In addition to these protocols, ongoing engagement with Tsawwassen First Nation will identify any additional permits or approvals that may be required for the Project related to the potential use of Tsawwassen Lands or Water Lots. GCT, through further engagement with other Indigenous nations, will identify any other Project permits that may be required subject to a modern-day treaty or comprehensive land claim agreement.

Table 12 provides a preliminary overview of the potential environmental, social and economic effects that may result in Canada from the issuance of federal permits, authorizations and licenses. Additional effects may result from the issuance of federal permits and will be further explored through the specific permitting process.

**Table 12: Potential Effects Resulting from the Issuance of Federal Permits, Authorizations and Approvals.**

Permit	Legislation	Regulator	Potential Environmental, Social or Economic Effects
<i>Fisheries Act</i> Authorization	<i>Fisheries Act</i>	DFO	Harmful alteration, disruption or destruction of fish habitat or death of fish. Effects on wetlands and wetland function. Changes in harvested foods and community health and wellness. Changes in marine food quality.
Navigable Waters Approval	<i>Canadian Navigable Waters Act</i>	Transport Canada	Changes in harvested foods and community health and well-being.
Disposal at Sea Permit	<i>Canadian Environmental Protection Act</i> ; Disposal at Sea Regulations	ECCC	Changes in marine water quality and marine habitat. Changes in navigation and access for fishing and other marine uses. Changes in harvested food quality.
Amendment to Existing Lease Agreement	<i>Canada Marine Act</i>	VFPA <sup>1</sup>	Changes to air quality, greenhouse gas emissions, sound levels and marine water quality. Changes in visual quality, community health, marine navigation, marine recreational activities, and fishing.

<sup>1</sup> The VFPA’s administrative, permitting and other powers with respect to the DP4 Project, including those related to port operations, are currently the subject of judicial review.

**Table 12: (Cont'd.)**

Permit	Legislation	Regulator	Potential Environmental, Social or Economic Effects
Agreement or permit authorizing an activity affecting listed wildlife species, any part of its critical habitat or the residences of its individuals	<i>Species at Risk Act</i>	DFO	Changes to the underwater acoustic environment. Physical disturbance such as vessel strike. Changes in prey availability. Cultural heritage effects due to impacts on culturally important species. Changes and effects on current and traditional use due to changes in the abundance of listed species.
Project and Environmental Review Permit	<i>Canada Marine Act</i> IAA	VFPA <sup>1</sup>	Changes to air quality, greenhouse gas emissions, sound levels and marine water quality. Changes in visual quality, community health, marine navigation, marine recreational activities, and fishing.

<sup>1</sup> The VFPA’s administrative, permitting and other powers with respect to the DP4 Project, including those related to port operations, are currently the subject of judicial review.

## 6 ENVIRONMENTAL SETTING

This section was developed to provide a general description of the natural and human environment setting and initial information regarding known previous and ongoing studies in the region. The Project baseline and existing conditions will be developed and established later in the assessment process.

Indigenous nations have lived and sustained themselves and their way of life within their territory, which includes the Project area and marine shipping route, since time immemorial. IK is critical to the development of the Impact Assessment, GCT will engage with Indigenous nations to develop Project related documents and processes that rely on both IK and western science. This includes the development of baseline and existing conditions. GCT's engagement with Indigenous nations is discussed in Section 8.4.

### 6.1 Past and Present Environmental Studies in the Region

The Project is not located in an area that has been subject to a regional assessment under section 92 or 93 of the IAA. The Government of Canada's Strategic Assessment of Climate Change (Government of Canada 2020a) guidance document has informed the approach GCT has used to estimate the Project's GHG emissions (in CO<sub>2</sub> equivalent units) for this DPD, as described in Section 7.4.3.

As part of the Government of Canada's CAD 1.5 billion Oceans Protection Plan and national strategy to create a world-leading marine safety system while protecting the coastline, the Cumulative Effects of Marine Shipping initiative is intended to create a shared approach to better understand coastal ecosystems and the possible effects that ships have on the environment. More specifically linked to this program, the Salish Sea Initiative responds to cumulative effects, including impacts on the SRKW and creating new critical habitat areas. It is a long-term investment approach to develop and support the capacity of Indigenous nations along the Salish Sea to monitor and evaluate the impact of human activities on their local ecosystems. The Coastal Environmental Baseline Program (CEBP) is also part of the Oceans Protection Plan. Launched in 2016, the CEBP provides CAD 50.8 million over 5 years to collect comprehensive data on the state of 6 marine ecosystems in Canada, including in the Port of Vancouver, through the Fraser River Estuary Eulachon Migration Study being conducted by Tsawwassen First Nation, and the Port of Vancouver's ecosystem characterization program being conducted by the Tsleil-Waututh Nation.

The Fraser River Estuary has been the subject of numerous environmental studies over the past few decades, and the Project is therefore supported by a large body of contemporary information that will inform the Impact Assessment. A summary of some of these studies is provided in Table 13.



**Table 13: Environmental Studies and Programs.**

Project/Program	Study	Summary	Year
DP3	Environmental Assessment (VFPA 2005)	The environmental assessment process conducted for the DP3 Project was robust and included numerous studies, including the identification of habitats at Roberts Bank that required mitigation and protection.	2006
	Adaptive Management Strategy (Hemmera Envirochem Inc. 2015)	A science-based program to monitor and manage the ecosystem of the Roberts Bank inter-causeway area has concluded after eight years of monitoring that the ecosystem has not suffered any significant negative impacts due to the construction of a third berth at the GCT Deltaport container terminal, which began in 2007.	2007 – 2014
Deltaport Road and Rail Improvement Project – Intermodal Yard Reconfiguration at Roberts Bank	VFPA Project Environmental Review – Category C	The environmental review considered potential adverse environmental and social effects of the project on 16 environmental components (e.g., species with special status, aquatic species and their habitat, recreational interests, etc.) and malfunctions and accidents. These environmental components are aspects of the biophysical and socio-economic environment considered to have ecological, economic, social, cultural, archaeological, or historical importance.	2015
Government of Canada’s Oceans Protection Plan	Cumulative Effects of Marine Shipping	A shared approach to better understand coastal ecosystems and the possible effects that ships have on the environment in order to create a national strategy and world-leading marine safety system that gives economic opportunities to Canadians.	2017 – Ongoing
Government of Canada’s Oceans Protection Plan	CEBP	The program provides CAD 50.8 million over 5 years to collect comprehensive data on the state of 6 marine ecosystems in Canada that are deemed to have existing or potential high vessel traffic, including the Port of Vancouver.	2016 – Ongoing
Salish Sea Initiative	Funding available for Indigenous Nation led studies	The Salish Sea Initiative is a long-term investment strategy to support eligible Indigenous nations in monitoring and evaluating the impacts of human activities on local marine ecosystems. The accommodation measure for the Trans-mountain Pipeline was created in response to concerns about the cumulative effects on valued ecosystem components. Through the initiative, DFO is co-developing processes with eligible Indigenous nations to ensure long-term funding to support capacity building, monitoring, research, systems infrastructure and knowledge acquisition, integration and sharing to inform adaptive management.	2020 – Ongoing

**Table 13: (Cont'd.)**

Project/Program	Study	Summary	Year
Metro Vancouver's Integrated Air Quality and Greenhouse Gas Management Program	Integrated Air Quality and Greenhouse Gas Management Plan	A comprehensive action-oriented plan that aims to protect public health and the environment, improve visual air quality and minimize the region's contribution to global climate change through an adaptive management approach.	2011 – Ongoing
Robert Bank Terminal 2 Project	Environmental Assessment (Port Metro Vancouver 2015)	The RBT2 project is currently undergoing a federal environmental assessment under the previous <i>Canadian Environmental Assessment Act</i> 2012. It included baseline field surveys, scientific studies and environmental effects assessment. Information is available from engagement with Indigenous nations, communities, regulators and academics. Technical Advisory Groups were established to gather expert advice on the Roberts Bank ecosystem. There was also a recently released federal review panel report (Review Panel 2020).	2011 – Ongoing
Sturgeon Bank Marsh Recession Project	Scientific Study	An investigation by FLNRORD, ECCC, and the VFPA into the cause of approximately 250 ha of tidal marsh recession throughout the Fraser River delta front WMAs since 1989.	2019
Lower Fraser River Salmon Conservation Program	Scientific Studies	Raincoast Foundation is working with its partners, including UVic's Baum Lab, UBC's Salmon Conservation & Ecology Lab, UBC's Conservation Decisions Lab, to characterize the use of the estuary by different species of juvenile salmon.	2016 - Ongoing
Trans-Mountain Expansion Project (TMX) and other Marine Terminal Projects	Environmental Assessment Marine Shipping Studies	An extensive body of knowledge has resulted from the assessment and permitting of TMX and other marine terminal projects within the Strait of Georgia, including studies focused on underwater noise, SRKW and malfunctions and accidents.	N/A
Parks Canada National Marine Conservation Areas	Feasibility Study for the Proposed Southern Strait of Georgia National Marine Conservation Area Reserve	A feasibility assessment was launched in 2004 by Canada and the Province of BC to assess the feasibility of creating a new national marine conservation area reserve in the southern Strait of Georgia. The assessment includes the results of numerous consultations and technical studies analyzing ecological, cultural and socio-economic information.	2004 – Ongoing

**Table 13: (Cont'd.)**

Project/Program	Study	Summary	Year
Songhees Nation	Tl'ches Marine Use Plan	The Marine Use Plan documents community knowledge of Tl'ches (also known as the Discovery and Chatham Islands) and a vision for the future. It is intended to limit, reduce and mitigate negative impacts with regulation, enforcement and continued monitoring. The Marine Use Plan will be a living document guiding the Songhees Nation's efforts to protect and govern the Islands.	2019
<i>A Species at Risk Act</i> Section 11 Conservation Agreement to Support the Recovery of the Southern Resident Killer Whale ( <i>A Species at Risk Act</i> Section 11 Conservation Agreement 2019)	Agreement signed by the Government of Canada, VFPA, Pacific Pilotage Authority and five marine transportation industry partners.	Agreement of the parties to participate in the VFPA-led Enhancing Cetacean Habitat and Observation (ECHO) Program and further develop understanding and management of the impact of shipping activities on at-risk whales throughout the southern coast of BC.	2019 – Ongoing

Additional relevant studies have been undertaken by organizations, such as Lower Fraser Fisheries Alliance, the Pacific Salmon Foundation and historically under the now disbanded Fraser River Estuary Management Program. Tsawwassen First Nation has also undertaken independent studies, such as the Dungeness Crab Abundance and Movement Study in the RBT2 Project Area (LGL 2017). The City of Delta and other municipalities have developed coastal flooding and climate change adaptation studies and strategies that are relevant to this Project. Habitat offsetting projects such as the VFPA's Tsawwassen Eelgrass Project will also provide useful data and information for the Impact Assessment. GCT will also be seeking access to various studies undertaken by Federal Authorities and members of the Technical Advisory Committee to help inform the Project assessment.

In response to the calls to action voiced by many Indigenous leaders, in 2020 [GCT established a CAD 200,000 fund to support Indigenous-led initiatives](#) aimed at collaboration and fully supporting increased Indigenous-led research on cumulative effects. The funding has facilitated the creation of the Salish Sea Indigenous Guardians Association (SSIGA), aimed at increasing both participation and collaboration in the cumulative-effects assessment of the south Salish Sea off BC's coast. The funding initiative is not specific to the DP4 Project but may inform the assessments of projects in the area.

Table 14 provides a list of preliminary baseline studies that may be undertaken to support an understanding of current baseline conditions in order to inform the Impact Assessment. GCT continues to advance desktop studies to evaluate the wealth of publicly available information and is committed to working with academia, stakeholders, Indigenous nations and others to continue to build on the extensive body of knowledge that exists for Roberts Bank and surrounding areas. Future studies will be prepared in accordance with relevant guidance and standards and may change as the Project progresses into the assessment phase. GCT is committed to engaging with regulators and Indigenous nations on the scope and methods used to conduct future studies, the results of which will be presented in the Project's assessment. Where available and with permission, traditional use information and IK, including information related to Indigenous rights and interests will be incorporated into the Impact Assessment.

**Table 14: List of Anticipated Baseline Studies for the Project.**

Discipline	Study for 2021 – 2023
Air Quality	<ul style="list-style-type: none"> <li>• Baseline air quality inventory</li> <li>• Air dispersion modelling</li> </ul>
Noise	<ul style="list-style-type: none"> <li>• Low-frequency monitoring</li> <li>• Noise and vibration survey</li> </ul>
Wildlife	<ul style="list-style-type: none"> <li>• Coastal waterbird survey</li> <li>• Marine bird survey</li> <li>• Great blue heron survey</li> <li>• Migration shorebird survey</li> <li>• Overwintering shorebird survey</li> </ul>
Fish and Fish Habitat	<ul style="list-style-type: none"> <li>• Fish surveys including juvenile salmon (chinook)</li> </ul>
Marine	<ul style="list-style-type: none"> <li>• Marine vegetation (e.g., saltmarsh, biofilm, eelgrass, and macroalgae) intertidal and subtidal surveys</li> <li>• Marine habitat surveys/mapping</li> <li>• Marine invertebrates and marine fish</li> <li>• Adult and juvenile Dungeness Crab surveys</li> <li>• Intertidal and subtidal marine infauna</li> <li>• Geomorphological modelling</li> </ul>
Marine Water and Sediment	<ul style="list-style-type: none"> <li>• Sediment quality</li> <li>• Marine water quality survey</li> </ul>
Marine Mammals	<ul style="list-style-type: none"> <li>• Salish Sea marine mammal abundance, density and habitat use survey</li> <li>• Marine mammal behavioural response study</li> <li>• Underwater noise modelling study for DP4 construction and operations phases</li> </ul>
Marine Sediment/ Human Health	<ul style="list-style-type: none"> <li>• Baseline marine shellfish survey, tissue sampling and co-located sediment sampling</li> <li>• Baseline marine crab survey, tissue sampling and co-located sediment sampling</li> </ul>
Socio-Economic	<ul style="list-style-type: none"> <li>• Key Informant Interviews</li> <li>• Economic Impact Analysis</li> <li>• Data collection for GBA+ requirements</li> </ul>
Indigenous Knowledge (IK)	<ul style="list-style-type: none"> <li>• Ongoing engagement with Indigenous nations will continue to better understand the exercise of Indigenous Interests within the Project area and potential baseline studies needed to support this.</li> </ul>

## 6.2 Previous Disturbances

The history of development at Roberts Bank dates to the late 1950s with the construction of the Tsawwassen Ferry Terminal and subsequent construction of the Roberts Bank coal terminal and container terminal expansions over several decades. Key infrastructure developments include:

- 1958–1960: Construction of the Tsawwassen Ferry Terminal;
- 1968–1970: Construction of the 20 ha Roberts Bank coal terminal and causeway;
- 1981–1984: Expansion of the 20 ha Roberts Bank coal terminal to a 50 ha coal terminal and the creation of 65 ha of undeveloped land to the north;
- 1991–1995: 8 ha expansion of the Tsawwassen Ferry Terminal;
- 1994–1996: Development of GCT Deltaport on a portion of the land northeast of the coal terminal (approximately 35 ha);
- 2000–2003: Expansion of GCT Deltaport onto the portion of land northwest of the coal terminal (total area 65 ha);
- 2007–2010: Expansion of GCT DP3 (20 ha);
- 2014: Completion of the Roberts Bank Rail Corridor Project infrastructure improvements (nine new overpasses);
- 2014: Completion of the Roberts Bank Causeway Overpass;
- 2015–2020: Deltaport Terminal, Road and Rail Improvement Project; and
- 2019–2020: Construction of the Deltaport Truck Staging Facility.

Past studies have shown that there are no appreciable sediment contamination issues in the Project area (Review Panel 2020). Elevated copper, cadmium and inorganic arsenic concentrations greater than the Canadian Interim Sediment Quality Guidelines are known to exist and are attributed to naturally occurring conditions at Roberts Bank (Review Panel 2020). Elevated sediment concentrations of polychlorinated biphenyls have also been observed in the Project area, related to regional historical releases of those compounds.

## 6.3 Biological Setting

The Project is located on Roberts Bank, which is part of a larger complex of interconnected marine, estuarine, freshwater, and agricultural habitats that form the Fraser River estuary. Marine shipping will occur through the southern Georgia Strait and Juan de Fuca Strait, within the Salish Sea.

The climate is strongly influenced by the surrounding mountains. During winter, low-pressure systems move in from the Pacific Ocean and lead to heavy precipitation; long periods of warm, sunny weather typically occur from April to September. The marine and terrestrial environments in Delta are widely acknowledged for having rich ecological significance that includes marine mammals, fish, and migratory birds. The climate and soil characteristics of the estuary make it an attractive location for agricultural and residential development and as such, much of the terrestrial environment has been highly modified.

Roberts Bank consists of salt marshes, near the high-tide level, that give way to gently sloping mudflats divided by tidal channels and hydraulic bedforms. Near the high tide level, Roberts Bank consists of intertidal salt and estuarine marsh habitats that give way to gently sloping sand and mud flats. The mudflats at Roberts Bank possess macroalgae, biofilm, and biomat, which are important sources of primary production in estuarine environments (Port Metro Vancouver, 2015b, Worley Parsons, 2015). Intertidal and subtidal marine vegetation assemblages include native eelgrass (*Zostera marina*) and non-native eelgrass (*Z. japonica*) beds, which host a diversity of epifauna that are an important food source for fish and sequester carbon. Outside of the bedforms, marine vegetation and other habitats have developed. Roberts Bank, including the inter-causeway area, supports extensive native eelgrass beds (Hemmera Envirochem Inc. 2015).

The marine and terrestrial environments in Delta are widely acknowledged for having rich ecological significance that includes marine mammals, fish, and migratory birds. The Project occurs within the Salish Sea, one of the world's largest and biologically rich inland seas with an estimated 37 species of mammals, 172 species of birds, 253 species of fish, and more than 3,000 species of invertebrates (Gaydos and Brown 2011). Of these, 113 species are listed as threatened, endangered or are candidates for listing (Gaydos and Brown 2011). The Fraser River Estuary has been designated an IBA, where Boundary Bay, Roberts Bank, and Sturgeon Bank form one of the richest and most important ecosystems for migrant and wintering waterbirds in Canada (IBA Canada 2020). In 2005, the intertidal portions of the Fraser River Estuary were designated as a Western Hemisphere Shorebird Reserve Network site of hemispheric importance.

The Fraser River Estuary provides valuable habitat for waterbirds, shorebirds, and raptors, with an annual use estimated at 1.4 million birds (Butler and Campbell 1987). The IBA supports significant populations of fifteen species of waterbirds, as well as nationally significant populations of barn owl (*Tito alba*) and peregrine falcon (*Falco peregrinus*) (IBA Canada 2020). The estuary provides a key stop-over point on the Pacific Flyway during northward and southward migrations, where shorebirds can replenish energy and fat reserves by foraging on the mudflats for benthic infauna (e.g., polychaetes) and nutrient-rich biofilm (Ydenburg 2014). During northward migration, an average of 600,000 western sandpiper (*Calidris mauri*) and 200,000 Pacific dunlin (*Calidris alpina pacifica*) use habitat at Roberts Bank (Hemmera Envirochem Inc. 2014).

Roberts Bank neighbours one of the main entry channels into the Fraser River for the largest salmon run in BC. All five species of Pacific salmon use the tidal marshes and eelgrass habitats for food, shelter and acclimatization to saltwater. Juvenile salmon use the Fraser River Estuary during outmigration to the ocean and have been documented utilizing habitat along both sides of the Roberts Bank causeway and nearshore intertidal areas in the inter-causeway (Archipelago 2014). The abundance of Pacific salmon populations in BC has declined in the past decade (Grant et al. 2020). In the Fraser River, 2019 returns of sockeye salmon were the lowest on record (PSC 2021) and returns of Chum, Chinook, and Coho were generally poor (Grant et al. 2020).

Other fish drawn to Roberts Bank include white sturgeon, green sturgeon, steelhead and anadromous cutthroat trout. Visiting herring, eulachon, flounders and sculpins are food sources for diving and wading birds. Marine mammals are important components of the Fraser River Estuary and Roberts Bank ecosystem. The overall health of the marine environment is reflected through the presence of top predators, including toothed whales such as SRKW, baleen whales such as humpback whales, and seals and sea lions (Port Metro Vancouver 2014). The Project occurs within designated SRKW critical habitat, where the presence of SRKW is strongly correlated with the timing of salmon migration through these waters (DFO 2018).

Environment Canada, Metro Vancouver and the Fraser Valley Regional District operate a network of air quality monitoring stations in the Lower Fraser Valley. The pollutants monitored at these stations include particulate matter, ozone, sulphur dioxide, nitrogen oxides, carbon monoxide, ammonia and volatile organic compounds (FVRD 2020). Metro Vancouver's GIS Airmap indicates that the nearest air quality monitoring station to the Project area is located in Tsawwassen.

Table 10 in Section 4.3 provides an overview of parks and protected areas in the vicinity of the Project.

## 6.4 Human Environment Setting

### 6.4.1 Socio-economic Setting

The Project is located within the boundaries of the City of Delta which includes three urban communities: Ladner (administrative centre), Tsawwassen and North Delta. Other communities include Boundary Bay and Tsawwassen First Nation. Tsawwassen First Nation is the closest community occupying the foreshore and lands between the Deltaport causeway on Roberts Bank and the BC Ferries Tsawwassen Terminal causeway. The communities of Ladner and Tsawwassen are approximately 9 km away by road although the line-of-sight distance to Tsawwassen is only approximately 3 km over mostly open water. North Delta is significantly further away to the east (28 km). The proximity of the Tsawwassen First Nation community and other Indigenous nations is described in Section 8.1. The City of Delta is bordered by the Fraser River to the North and the Canada-USA border to the south. Land use in Delta is a mixture of urban and industrial (28%), conservation and recreation (21%), and agricultural land (51%) (Metro Vancouver 2020b).

In 2016 the population of Delta was estimated at 102,000 people of whom 22,193 resided in Ladner, 21,588 in Tsawwassen and 60,000 in North Delta. In 2016, the median age was 45.3 years and seniors (defined as adults aged 65 years and older) made up 20% of the population. The population is ageing rapidly and, if current trends continue, the percentage of seniors is expected to double to 41% by 2024. Over the five years from 2011 to 2016, the population grew by 2.3% or approximately 0.48% annually. Over the same period, the labour force registered similar growth of 2.5%, reaching 54,370 persons in 2016 with a labour force participation rate of 64%. In 2016, the unemployment rate in Delta was 5.3%, lower than that of the rest of the Metro Vancouver area (5.8%). Over 12.6% of the labour force was self-employed. On average, the level of educational attainment is high, with over 40% of adults possessing a university degree, 26% college degree or diploma and 26% high school diploma (Statistics Canada 2016).

Delta has one of the fastest rates of industrial growth in the Greater Vancouver Area (Delta 2020; Statistics Canada 2016). Average household income is 30% higher than the Canadian average and most census respondents occupied single-family detached homes in 2016 (Statistics Canada 2016). Leading industries and major employers include aerospace, manufacturing, construction, energy, transportation, deep sea and river shipping, communications and tourism. The local and regional economy is largely driven by the activities at Deltaport – the largest container terminal in Canada (Trade and Invest British Columbia 2020).

The RBRC runs out to the existing GCT Deltaport Container Terminal and connects to the BC Rail Line. Major roads in the vicinity include the South Fraser Perimeter Road, Highway 17A, Highway 99, Highway 91, and Deltaport Way. BC Ferries' Tsawwassen Terminal is located approximately 2 km to the south of the DP4 Project. Ferry service from Tsawwassen Terminal runs to Vancouver Island (Swartz Bay and Duke Point) and several ports of call in the southern Gulf Islands. The Canada-USA border, separating Delta from the small USA community of Point Roberts, defines the southern boundary for Delta. Services in Delta are concentrated in Ladner and Tsawwassen.

While outside of GCT's care and control, the Project's marine shipping may affect the communities located within the Southern Gulf Islands and the coast of Vancouver Island. These communities include Sidney, Victoria, Sooke and Port Renfrew.

Vancouver Island is the second most populous economic region in BC. It has experienced a steady population and economic growth. The population grew 1% in 2016, 1.3% in 2017 and 1.3% in 2018. The largest employers are the health care and social assistance sector (59,400 people), wholesale and retail trade (56,000) and construction (36,000) (BC Stats 2018).

Indigenous and coastal communities are closely connected to the marine environment and rely on marine resources to sustain their livelihoods. They depend on the Salish Sea for its marine biodiversity, culturally significant marine mammals and fish species and economic opportunities, primarily in tourism and commercial fishing, and recreation.

Approximately 11,000 large cargo vessels transit the Salish Sea annually. With major resource development and infrastructure projects underway, the vessel traffic in the Salish Sea is expected to increase. Through the environmental assessment processes for such projects and organizations such as the Islands Trust, coastal and Indigenous communities have expressed concerns over the increased levels of marine shipping activity, and anchorage activity within the Salish Sea.

#### 6.4.2 Human Health Setting

Delta residents have access to high-quality health care, community services and recreational facilities which are reflected in the above-average level of population health. A healthy community is a priority identified in the City's Community Development Plan and includes the allocation of funds and support to services, such as mental health, drug use and addiction, poverty, and food security (City of Delta 2017).

The Deltaport container terminal is located approximately 3.5 km away from the nearest residence. Noise and vibration from ships, machinery, and existing road and rail traffic entering and exiting the terminal have long been a concern for Tsawwassen and Delta residents (City of Delta 2019).

A desktop assessment of publicly available documents revealed no existing seasonal or temporary residencies in the vicinity of the Project, such as seasonal trappers' cabins, wilderness resorts or housing for seasonal farmworkers. As the Project proceeds, information will be updated if such residencies are identified.

The light and visual landscape out into the Georgia Strait is dominated by Westshore, GCT Deltaport and the BC Ferries terminal. These facilities have been part of the visual landscape for residents of Delta and Tsawwassen since the 1950s.

Air quality in Delta is generally good as the area is flat and is exposed to ocean breezes from the Strait of Georgia. Delta is an urban-agricultural community, therefore residents are sometimes exposed to farming-related odours. Air emissions from trucks, trains, ships, and equipment are largely associated with the operation of the Roberts Bank and BC Ferries terminals.



### 6.4.3 Heritage Setting

There have been several archaeological studies in the area (Arcas 2008; Vancouver Port Authority 2005; Millennia Research Limited 2004), resulting in limited archaeological resource discovery. An Archaeological Impact Assessment (AIA) conducted as part of the DP3 environmental assessment found no archaeological sites in the Project area (Vancouver Port Authority 2005).

An AOA, conducted as part of the RBT2 environmental assessment, recorded three archaeological sites in proximity of the RBT2 project area. One site (DgRs-2) consists of a large shell midden and is located on Tsawwassen Lands, approximately 3.5 km southeast of Deltaport Way at 41B Street. The second site (DgRs-9) is located 4.3 km to the south of Deltaport Way and consists of shell midden deposits. Several artifacts and various human remains were encountered at this site, suggesting it was a burial ground ca. 900 before the present. The third site (DgRs-11) is located approximately 50 m northeast from DgRs-9 and consists of disturbed shell midden deposits (Millennia Research Limited 2004).

GCT recognizes that the assessment of heritage resources is not limited to known archeological and cultural sites. GCT will conduct an AOA to evaluate archaeological potential. The AOA results will be used to determine if an AIA is required. GCT will continue to work with Indigenous nations to ensure cultural and heritage resources are assessed and protected under the *Heritage Conservation Act* and in accordance with the requirements of Parks Canada for federal lands, including federal lands under water.

## 7 POTENTIAL EFFECTS OF THE PROJECT

As per the federal requirements for the DPD, this section describes the potential for changes caused as a result of the Project to fish and fish habitat and marine plants as defined in the *Fisheries Act*, aquatic species as defined in the *Species at Risk Act*, and migratory birds, as well as potential changes to the environment on federal lands, in a province other than the province in which the Project is proposed to be carried out, or outside Canada. Section 7.8 and 8 discusses the potential effects of environmental changes on Indigenous peoples.

### 7.1 Project Updates and Changes

In accordance with the Federal and Provincial DPD requirements, Section 7 is updated to reflect the following project updates and changes:

- Updates to the description and management of emissions, discharges, and wastes based on Project phases to address DPD requirements;
- Additional information on GHG emissions, carbon sinks, methodology and approach to net-zero plan to address the ECCC guidance for Strategic Assessment of Climate Change (2020) and DPD requirements;
- Additional details on the scope of the socio-economic studies to reflect GBA+ as required under Federal and Provincial requirements;
- Additional information provided on potential effects on fish and fish habitat, aquatic species and migratory birds;
- Additional information related to public and environmental safety as per the DPD requirements;
- Updates to the malfunctions and accidents section to address DPD requirements;
- Additional information on the approach to proposed mitigation measures and a list of potential monitoring programs for potential inclusion in the Impact Assessment; and
- Incorporation of additional information related to issues and concerns provided from Indigenous groups through the JSOIE report and further engagement activities as it relates to the preliminary understanding of potential effects on Indigenous interest from Project activities.

### 7.2 Potential Effects in Relation to *Impact Assessment Act* Requirements

Potential effects that relate to IAA requirements have been identified based on the past environmental studies described in Section 6.1. These relate to the following:

- Fish and fish habitat, as defined in subsection 2(1) of the *Fisheries Act*;
- Aquatic species, as defined in subsection 2(1) of the *Species at Risk Act*; and
- Migratory birds, as defined in subsection 2(1) of the *Migratory Birds Convention Act, 1994*.

A summary of the potential effects is presented in Table 15 with further information in the following subsections. As a result of the biological setting in the marine environment on Roberts Bank, as described in Section 6.3, these potential effects are expected to be at the core of the Impact Assessment.

### 7.2.1 Fish and Fish Habitat and Aquatic Species

The Project footprint overlaps with the range of some Species at Risk (e.g., steller sea lions and SRKW), as stated in Appendix D, and is also within the SRKW's critical habitat. Effects on marine mammals, fish, and fish habitat may result from activities associated with Project construction and operation. Mudflat habitat and native and non-native eelgrass beds may be impacted by infill (i.e., burial) and dredging (i.e., removal) within the Project footprint. Any loss of these habitats would be compensated by the creation of new habitats. As identified in Sections 7.8 and 8.4, this habitat supports fish and aquatic species which have cultural, social, spiritual and economic significance for Indigenous nations. Filling and dredging might potentially harm other organisms living on or near the seabed (e.g., flatfish, crabs, sea stars), however, construction mitigations will be developed during the Impact Assessment process to ensure mobile species are not directly impacted by these activities. Construction activities will also be timed to avoid key marine mammal and fish life stages and migrations. Vessel strikes to marine mammals during construction and operation are addressed in Section 7.9. Some dredged material will be reused in the Project design and options for reuse (e.g., to support habitat offsetting) are being investigated by GCT. If material remains, it will be disposed of at sea and may affect benthic fauna.

The presence of additional structures around the terminal and causeway may have the potential to change the movement patterns of fish, which use inter-causeway habitats (e.g., eelgrass) for feeding and nursery grounds. DP4 is an expansion of the existing terminal, which creates a smaller footprint by sharing infrastructure with the adjacent terminal, compared to constructing a separate new terminal. It also does not extend any further out onto Roberts Bank than the existing terminal, reducing any additional barrier effects. Further studies will be conducted to study the potential effects on fish movement as the Project progresses through the Impact Assessment process (Section 6.1). Factors to be considered and the scope of the fish assessment will be described in the Joint Guidelines for the Project and will be confirmed through additional engagement with Indigenous nations, stakeholders, the public, Federal and Provincial regulators.

Additional dredging of the seabed could affect coastal geomorphology in the inter-causeway area by changing the natural contour of the seabed and the way currents flow over it. This has the potential to change flow patterns on neighbouring intertidal flats that could result in the creation of dendritic channels. However, comprehensive studies following DP3 construction showed that there was little influence of the project on channel development and that seasonal and annual tidal patterns were the main structuring force (Hemmera Envirochem Inc. 2015). GCT has incorporated crest protection into project design to mitigate against dendritic channels and will continue to assess and engage on these measures and alternatives during the Project assessment process.

Temporary construction and operational activities could also indirectly affect nearby saltmarsh, eelgrass beds and other biota such as SRKW via changes to water and sediment quality. For example, infilling, dredging, accidental spills from ships, and increased stormwater runoff could increase levels of sediment and contaminants in seawater. GCT will employ mitigation measures if deemed necessary to minimize indirect effects and develop emergency response plans and stormwater management plans. GCT has existing stormwater management systems and emergency response plans which have been successfully implemented during previous construction and operational activities. These plans would be updated as necessary to incorporate the Project.

During construction and operations, underwater noise and vibration have the potential to affect marine fish and mammals. Temporary construction activities such as pile driving and operational increases in ship traffic will increase underwater noise and vibration (discussed further in Section 7.4.2), which has been shown to disrupt marine

mammal, fish, and invertebrate behaviour (Hawkins and Popper 2017). Studies conducted during the Impact Assessment will determine whether an increase in noise is expected and how that might affect marine biota (Section 6.1). Construction noise mitigations will be employed if levels exceed DFO-defined sound thresholds. Additional shipping traffic is expected through the Salish Sea, and poses one of the highest risks to SRKW. Though outside of GCT's care and control, measures are in place, such as voluntary ship speed restrictions, through the VFPA ECHO program, to reduce vessel noise and the chance of marine mammal strikes.

Temporary work lighting during construction and additional permanent lights installed on the new berth have the potential to affect fish mortality around the terminal since mammal and fish predation can increase with increased nighttime lighting (Becker et al. 2013). During the Impact Assessment process, GCT will study whether light levels are expected to increase and whether effects to biota can be expected (Section 7.4.2).

### 7.2.2 Migratory Birds

The Project may have direct and indirect effects on migratory birds during construction and operation, including habitat loss and degradation, sensory disturbance, and increased risk of mortality. Expansion of the existing terminal and causeway will potentially result in the direct loss of estuarine habitat that supports internationally significant populations of coastal shorebird and waterbird species, some of which are at risk (Appendix D). Habitat degradation may result from indirect effects that extend beyond the Project footprint and influence the abundance and distribution of biofilm, eelgrass beds, and intertidal marsh. Sensory disturbance from increased levels of noise, vibration, and light emissions within the Project footprint and associated transportation corridors could result in habitat avoidance. Impacts to birds could result from Project-related increases in road, rail, and marine vessel traffic, if not appropriately mitigated.

Mitigation measures and standard practices to reduce potential effects on birds will be developed and described during the Impact Assessment process. Habitat loss can be minimized by considering the spatial extent required during the final design. The distribution and abundance of biofilm, eelgrass beds, and marsh habitat at Roberts Bank will be evaluated and measures to mitigate degradation or loss will be implemented. Construction activities will be scheduled to minimize potential effects to breeding and migrating birds, reducing the possibility of habitat avoidance. Restoration and offsetting will be considered for habitat loss that cannot be avoided. Mitigation measures developed for other Project components (e.g., atmospheric emissions) will likely mitigate potential effects on migratory birds.

Table 15 presents the potential effects in relation to federal assessment requirements specific to fish habitat, fish, aquatic species at risk, and migratory birds.

**Table 15: Potential Effects in Relation to Impact Assessment Requirements.**

Component	Potential Effect	Activities and Anticipated Pathway of Effect	Potential Mitigation and Offsetting
Fish Habitat	Changes in fish habitat (Harmful Alteration, Disruption or Destruction), e.g., eelgrass and intertidal marsh, although no intertidal marsh identified within the DP4 footprint, surveys to be updated (Hemmera Envirochem Inc. 2015).	Terminal and railyard expansion construction, dredging, infilling and potential disposal at sea: leading to direct destruction or secondary effects (e.g., change in water quality, sedimentation) leading to alteration of fish habitat. During operations: direct effects (e.g., propeller wash or dendritic channel formation), or secondary effects (e.g., changes in water quality due to an increase in wastewater discharge and propeller wash).	<ul style="list-style-type: none"> <li>• DP4 is an expansion of the existing terminal which has allowed a smaller footprint than building a new terminal.</li> <li>• Scour protection and control structures to reduce the risk of dendritic channels.</li> <li>• Minimize dredging footprint within engineering design.</li> <li>• Habitat offsetting.</li> <li>• Reuse of dredged material as an alternative to disposal at sea, as far as possible.</li> </ul>
Fish	Effects on fish, e.g., crab, salmon.	Terminal construction and railyard expansion, dredging, infilling, potential disposal at sea and associated marine transportation: leading to underwater noise, burial/crushing, reduced water quality, negative effects on migration. During operations: changes in water quality or underwater noise, including marine shipping. Light infiltration to the marine environment.	<ul style="list-style-type: none"> <li>• Operational requirements of ships at berth to avoid discharge of deleterious substances.</li> <li>• Stormwater management to reduce impacts on water quality.</li> <li>• Voluntary ship speed restrictions and routing to reduce vessel noise and risk of marine mammal strike (outside GCT care and control).</li> <li>• Lighting plan that reduces light pollution beyond the Project footprint.</li> </ul>
Aquatic Species at Risk	Harm or disturbance of listed species, e.g., SRKW, stellar sea lion. Changes in critical habitat.	Terminal construction and railyard expansion, dredging, infilling, potential disposal at sea and associated marine transportation: leading to underwater noise, potential for dust and particulate matter, reduced water quality, destruction of critical habitat, and reduction in prey species like juvenile salmon. Shipping: leading to underwater noise or vessel strike.	<ul style="list-style-type: none"> <li>• Construction timing windows to avoid species-at-risk.</li> <li>• Mitigations and offsetting for fish habitat.</li> <li>• Voluntary ship speed restrictions and routing to reduce vessel noise and risk of marine mammal strike (outside GCT care and control). Implementing measures that result from the Section 11 Conservation Agreement to support the recovery of SRKW (outside GCT care and control; A Species at Risk Act Section 11 Conservation Agreement 2019).</li> </ul>

**Table 15: (Cont'd.)**

Component	Potential Effect	Activities and Anticipated Pathway of Effect	Potential Mitigation and Offsetting
Migratory Birds	Harm or disturbance during construction and operations. Changes in habitat (e.g., eelgrass) and food sources (e.g., biofilm).	Terminal construction, and railyard expansion, dredging and infilling: change in habitat availability and avoidance, changes in predator/prey dynamics, sensory disturbance (e.g., noise, light, and vibration) resulting in changes to migration or movement patterns, or mortality due to collisions. Operations: change in habitat availability and avoidance, changes in predator/prey dynamics, and sensory disturbance (noise and light), or mortality due to increased traffic (road, rail, and shipping).	<ul style="list-style-type: none"> <li>• Project location.</li> <li>• Avoidance of biofilm.</li> <li>• Construction timing windows to avoid bird nesting and migrations.</li> <li>• Habitat offsetting.</li> <li>• Measures to reduce noise, light and vibration (see Section 7.4.2).</li> </ul>

Through the Impact Assessment and other permitting processes, GCT is committed to assessing these changes, and either avoiding, mitigating or offsetting the Project effects. As identified in Section 3.4.4, through the Impact Assessment process, as more information becomes available, other physical activities associated and incidental to the Project with potential effects may be considered.

### 7.3 Potential Environmental Effects on Federal Lands in a Province Other than the Province in which the Project is Proposed to be Carried Out or Outside Canada

The Project footprint is predominantly on federal lands. No changes to the environment are anticipated in a province other than the province of BC, in which the Project is proposed.

Potential Project effects in relation to federal IAA requirements are discussed in Section 7.2. Potential Project effects relating to the following components are discussed in Sections 7.4 to 7.7:

- Air and Noise;
- Waste;
- Socio-economic;
- Human Health; and
- Heritage and cultural importance.

Potential Project effects relating to malfunctions and accidents are presented in Section 7.9.2. Other potential Project effects that do not relate to these components are presented in Table 16. All of these Project effects may occur within or outside of federal lands.

**Table 16: Other Potential Effects of the Project.**

Component	Potential Effect	Activities and Anticipated Pathway of Effect	Potential Mitigation and Offsetting
Wetlands	Changes in wetland habitat, although no intertidal marsh identified within the DP4 footprint (Hemmera Envirochem Inc. 2015)	Terminal construction, dredging leading to direct destruction or secondary effects, e.g., change in water quality, leading to effects of wetlands. During operations secondary effects, e.g., changes in water quality.	Expansion of the existing terminal to minimize footprint. Scour protection and control structures to reduce the risk of dendritic channels. Habitat offsetting.
Wildlife	Effects on terrestrial wildlife	Terminal construction and operations, e.g., noise, light.	Shore Power. Use of electric and/or high-efficiency cranes and other equipment. Auto decoupling tractor-trailers.

The Impact Assessment will evaluate the potential environmental effects stated in Table 15 and Table 16 and will characterize such effects. Mitigation measures including best management practices will be incorporated into the Impact Assessment and will be subject to development in concordance with applicable federal, provincial and permit requirements.

GCT also looks forward to meaningful engagement with Indigenous nations on the Impact Assessment including mitigation measures. The Project could contribute cumulatively to potential effects on the environment and other pillars (economic, social, heritage and health) associated with past, present or future projects in the surrounding area. A cumulative effects assessment will be completed in the Impact Assessment.

The Project is approximately 2 km from the USA border, and ancillary activities beyond GCT’s care and control associated with marine shipping will transit through USA waters. Table 17 provides a list of changes that, as a result of carrying out the Project may occur outside of Canada. These potential changes will be further explored through the assessment process.

**Table 17: Changes that May Occur Outside of Canada Due to the Project.**

Component	Potential Project Related Changes Outside of Canada
Air Quality	<ul style="list-style-type: none"> <li>Increases in some criteria air contaminants (CACs) during operations due to marine shipping.</li> </ul>
Noise and Vibration	<ul style="list-style-type: none"> <li>Increases in perceptible noise levels during construction and operations due to material handling and shipping.</li> </ul>
Light	<ul style="list-style-type: none"> <li>Increases in light trespass and sky glow levels during construction and operations.</li> </ul>
Marine Sediment and Water Quality	<ul style="list-style-type: none"> <li>Temporary increase in turbidity and sediment deposition during construction following sediment re-suspension (dredging and potential disposal at sea).</li> </ul>
Underwater Noise	<ul style="list-style-type: none"> <li>Increased underwater noise during operations due to marine shipping.</li> </ul>

## 7.4 Emissions, Discharges and Waste

Project emissions, discharges and wastes will be managed in accordance with applicable Federal and Provincial regulations, guidelines, and policies. The following are expected emissions, discharges, and waste to be generated during Project construction and operations:

- Atmospheric emissions – air quality, GHG, noise, vibration, and light; and
- Solid, liquid, and hazardous wastes.

### 7.4.1 Air Emissions

Project activities associated with construction and operation phases will produce and release air emissions in the form of CACs and dust which have the potential to change atmospheric conditions. CACs include Particulate Matter (PM<sub>10</sub> and PM<sub>2.5</sub>), Carbon Monoxide (CO), Nitrogen Oxides (NO<sub>2</sub>), Sulphur Oxides (SO<sub>2</sub>), Volatile Organic Compounds (VOCs) and Ammonia (NH<sub>3</sub>). Construction equipment, vehicles, power supply (e.g., diesel generators), fossil fuel combustion equipment and fugitive dust are expected to contribute to CACs emissions during Project construction. Air emissions from Project construction will include dust and particulate matter that may be generated during site preparation, transport of materials, crews and equipment, soil transfer, infilling, and wind erosion from stockpiles of fill materials. Potential exposure pathways include dust from roads, soil stockpiles and site preparation activities, vehicle and equipment exhausts, and handling and stockpiling of debris and soils. Air quality and dust-related issues are expected to be local, temporary, and limited to working hours, with the exception of exposed soils, which could potentially generate dust if left uncovered under dry conditions. Dust emissions will be limited to the extent of the site boundaries and major haul roads. The Project's air emissions during construction activities will be mitigated through standard mitigation measures which shall be detailed in the Construction Environmental Management Plan, e.g., measures such as road watering during dry conditions to limit the spread of dust beyond the Project boundaries and prevent any potential impacts to surrounding areas such as nearby agricultural operations.

During operations, the movement of marine vessels, cargo handling equipment and vehicle movements will contribute to air emissions. Project emissions sources during operations will be managed through adherence to best management practices, regulatory requirements, and guidelines. Operational activities and emission sources of DP4 will be similar to existing operations and therefore the EMS will only require updates to cover the additional capacity and reconfiguration of some areas of the terminal, and to incorporate additional activities. GCT's EMS contains procedures for managing ozone-depleting substances and plans are regularly reviewed and updated to ensure compliance with environmental regulatory requirements. Given the expanded terminal footprint area for the handling and storage of containers will be paved, dust generation during operation is not anticipated.

As stated in Section 3.4.3., GCT has no plans to decommission the Project once constructed.

GCT and the VFPA introduced a shore power system at GCT Deltaport Berth 3 in November 2019. This technology allows vessels to plug into the electrical power grid (which is hydroelectric based) at GCT Deltaport and turn off their auxiliary diesel engines while docked. This reduces fuel consumption and eliminates up to 95 tonnes of air pollutants per vessel – equivalent to removing 20 vehicles off the road for one year. The proposed terminal expansion at DP4 will facilitate further shore power connections.



Changes in air quality due to construction and operational activities may interact with Indigenous health, social or economic conditions, as described in Section 7.8.

The Project falls under Metro Vancouver’s Integrated Air Quality and Greenhouse Gas Management Plan, described in Table 13. Table 18 provides an initial list of potential effects of atmospheric emissions.

**Table 18: Summary of Potential Atmospheric Emissions.**

Atmospheric Emissions	Activities and Anticipated Pathway of Effect	Potential Mitigation
CACs	Construction: Increased emissions associated with fossil fuel-powered vehicles and equipment. Dust through soil transfer, infilling and wind erosion from stockpiles of fill material. Operations: Increased emissions associated with fossil-fuel-powered equipment, shipping, road and rail.	<ul style="list-style-type: none"> <li>• Shore Power.</li> <li>• Use of electric and/or high-efficiency cranes and other equipment.</li> <li>• Auto decoupling tractor-trailers.</li> </ul>
GHGs	Construction and operation: Increased emissions from fossil fuel-powered vehicles and equipment (including non-road diesel engines, generators and light plants), site clearing activities, infilling activities, dredging, terminal and railyard expansion construction activities.	
Light	Construction and operation: Increased lighting to support Project activities, primarily during nighttime operations.	
Noise and Vibration	Construction: Increased noise and vibration resulting from activities, such as pile driving and compaction. Operations: rail operations, container handling adjacent to the Project. Increased noise from the re-location of the new overpass. Increased noise from shipping, road and rail.	

### 7.4.2 Noise, Vibration and Light Emissions

Increased levels of noise and vibration are anticipated to result primarily from temporary construction activities such as pile driving and soil compaction and operational activities associated with rail shunting, cargo handling and marine ship movements. The environment surrounding Roberts Bank is already influenced by noise and vibration from the existing Roberts Bank terminals, the BC Ferries terminal, road and rail traffic, and the Project would contribute to daily noise levels. Furthermore, as stated in Section 3.3, the construction of the new overpass as part of the causeway road improvements may also potentially result in changes to noise. The Project has the potential to affect both people through sensory disturbances and wildlife within the marine shipping area and within communities closest to the Project, such as Delta and the Tsawwassen First Nation. Given the distance of the Project area from nearby agricultural land, it is not anticipated that noise and vibration levels will affect livestock.

GCT will explore opportunities to reduce effects associated with increased noise and vibration by developing plans prior to the start of construction that limit construction noise, regularly maintaining equipment, carrying our noise effects awareness training for staff, and notifying local residents of construction activities.

Temporary lighting during Project construction and operations from building and work area lighting, construction equipment, and marine vessels may affect the atmospheric environment and operational will be 24 hours per day so and may result in light trespass and sky glow. This will include new high mast lights on the expanded terminal and

lighting installed on the new ship-to-shore gantry cranes. The effects of lighting from marine ships are expected to be less than operational activities as container ships have a temporary and lower luminous output and generally move during the day.

Light pollution will be managed by engaging affected parties and developing designs and plans to address light trespass and sky glow, including best management practices associated with minimizing the number of light installations, LED lights, and orientating lights away from residential and marine areas. Site lighting levels are regulated by federal and ILWU safety work requirements to ensure employee safety and meeting ILWU and federal requirements.

GCT has no plans for a decommissioning phase for the Project, as stated in Section 3.4.3.

A Construction Environmental Management Plan will be developed prior to construction which will specify mitigation measures, best management practices and regulatory requirements to be followed related to noise, vibration and light emissions.

### 7.4.3 Greenhouse Gas Emissions

A GHG is any atmospheric gas that absorbs and re-emits infrared radiation resulting in warming of the lower levels of the atmosphere (IPCC 2013). GHG emissions will be emitted directly by the Project from construction and operational activities such as power supply (e.g., fuel combustion, diesel generators), on-road vehicles, site clearing, and may include the following GHGs; Carbon Dioxide (CO<sub>2</sub>), Methane (CH<sub>4</sub>), Nitrous Oxide (N<sub>2</sub>O) converted into CO<sub>2</sub> equivalent units (tCO<sub>2</sub>e).

GCT has a proven track record of excellence towards sustainability and GHG emissions reductions which will extend to the DP4 Project design and operations. GCT's achievements include achieving high marks in the Green Marine certification system for all its terminals and achieving an average annual reduction of 3.7% in GHG emissions intensity (per TEU) across its Canadian operations. GCT also measures its carbon footprint and calculates emissions as per the GHG Protocol Corporate Accounting and Reporting Standard and is Climate Smart Certified.

The ECCC's Strategic Assessment of Climate Change (ECCC 2020) guidance document has informed GCT's preliminary approach to estimate the Project's GHG emissions (in CO<sub>2</sub> equivalent units) for this DPD, as detailed in Appendix E.

Appendix E estimates net emissions from the Project and what would occur in the absence of the Project (i.e., a base case or business as usual scenario). The base case represents the GHG emissions scenario that would take place in the absence of the Project. As the expansion in terminal capacity provided by the Project is necessary to meet growing demand in western Canada, a reasonable scenario in the absence of the Project is that another expansion project will be constructed to meet growing demand. This selection is conservative, as it is the most economical and lowest emission method of adding terminal capacity. Base case emissions are modelled using actual GHG emissions from the existing Deltaport facilities, including forecasted emissions reductions. Choosing this modelling approach aligns with GHG quantification principles: conservativeness by using a modern, efficient site for the base case; accuracy by using real, not estimated data; and consistency, by aligning conditions and boundaries of the Project and base case.

The approach used to establish the Project and base case boundaries and emissions estimates are consistent with the Climate Lens<sup>1</sup>, the guidance referred to in the Strategic Assessment of Climate Change, ISO 14064-2:2019<sup>2</sup>, and the GHG Protocol for Project Accounting<sup>3</sup>. GHG emission sources, sinks and reservoirs include direct emissions (scope 1) and indirect energy emissions (scope 2). The approach follows the principles of GHG Project Accounting as recommended by the Climate Lens, which is used to ensure the inventory represents a faithful, true and fair account of total and net GHG emissions.

Emissions or removals that are of consequence to the Project but occur at GHG sources or sinks not owned or controlled by GCT (scope 3) including marine shipping, truck and rail locomotives emissions, are not included in the scope of the GHG quantification specified by the Strategic Assessment of Climate Change.

Further details regarding the scope, procedures, and methods for the GHG assessment will be developed in the Joint Guidelines and associated plans. A number of the comments that were provided to GCT on the draft DPD were related to the scope of the GHG assessment. GCT has tracked all the comments provided to date and identified those for further consideration and discussion during the development of the Joint Guidelines. A first draft of the Joint Guidelines was prepared by GCT and then submitted to IAAC and BCEAO who will tailor the document and consult on it with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuances of the final Joint Guidelines.

Appendix E shows the preliminary GHG estimates for the Project and base case and the net GHG emissions between them. Net GHG emissions, the emissions reduced by the Project relative to the base case, are evaluated in the assessment. In this assessment, all emissions from the Project and base case occur within Canada.

Based on the assessment completed for the DPD, the Project is anticipated to:

- Generate 230,869 tCO<sub>2</sub>e total emissions including construction, operations and decommissioning, equivalent to 9,620 tCO<sub>2</sub>e per year over the life of the Project up to 2050.
- Produce 87,866 tCO<sub>2</sub>e less total emissions relative to an alternative project required to meet increasing container terminal demand among Canadian west coast ports, equivalent to 3,561 tCO<sub>2</sub>e per year over the life of the Project up to 2050.

GCT is committed to reducing and avoiding GHG emissions where possible throughout the advancement of the Project. The use of low carbon fuels, hybrid and electric equipment and reduced energy consumption through efficient operations and management systems are some of the key opportunities GCT will consider as the Project design progresses. Initial estimates from these measures have been included in the preliminary Project's GHG emissions profile, including:

- Electrified yard cranes;
- Continued use of propane-fueled light-duty vehicles; and
- Possible adoption of hybrid, electric or battery-powered light-duty vehicles.

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<sup>1</sup> <https://www.infrastructure.gc.ca/pub/other-autre/cl-occ-eng.html>

<sup>2</sup> ISO 14064-2:2019 – Greenhouse gases – Part 2: Specification with guidance at the project level for quantification, monitoring and reporting of greenhouse gas emission reductions or removal enhancements

<sup>3</sup> The Greenhouse Gas Protocol for Project Accounting (World Resources Institute/World Business Council - Revised Edition)

The Project is also assumed to lessen emissions from GHG sources not owned or controlled by GCT (scope 3), including marine shipping, truck and rail emissions. While not included in the scope of this DPD, the Project is also forecasted to reduce indirect emissions from the following activities:

- Offer ships access to shore power, reducing the need to burn fuel while at berth;
- Accommodate larger ships to use the terminal, reducing the number of ships needed to transport goods;
- Layout and configuration improvements to reduce travel distances for container transport equipment;
- Market greater capacity to load containers onto rail as opposed to road, thereby reducing emissions required to transport goods via over-the-road-trucks to and from the terminal;
- Reduce truck idling time by improving truck flows and travel distances and managing an improved and robust container reservation system; and
- Adding ship capacity through the fourth berth will further optimize the rail yard and will be an attractive proposition to global shipping alliances (bigger ships, fewer calls).

Further details used on the assumptions included to support the GHG emissions are provided in Appendix E.

GCT will continue to refine and report on GHG emissions as the Project progresses through detailed design and the Impact Assessment process to include but not limited to the following:

- Presenting complete results including annual GHG forecasts through construction and 2050;
- Refining GHG calculations as more detailed Project design information becomes available;
- Systematically reviewing additional GHG mitigating technologies and approaches for design, construction and operations; and
- Exploring the potential for achieving net-zero emissions by 2050 through on-site reduction measures and purchasing offsets.

In accordance with the BC Climate Change Accountability Act, (previously known as the GHG Reduction Targets Act), GHG reduction targets for BC require a 40% reduction by 2030 (38,800,000 tCO<sub>2</sub>e/ year) below the 2007 level. Further reductions will follow with a 60% decrease for 2040 (25,900,000 tCO<sub>2</sub>e/year) and an 80% decrease by the year 2050 below 2007 levels (Government of BC 2018a). As stated above, the Project's total GHG emissions are estimated to be 9,620 tCO<sub>2</sub>e per year which represents a negligible proportion of the 2030, 2040 and 2050 reduction targets for the Climate Change Accountability Act. GCT will continue to explore the potential for achieving net-zero emissions by 2050. In the future, the Project can aim to further reduce emissions where possible by:

- Increasing electrification of equipment - currently the GHG estimate models partial electrification and fuel switching. Full electrification would reduce on-site GHG emissions to ultra-low levels;
- Investigating the use of best achievable technologies and project alternatives to reduce emissions;
- Planning to replace capital equipment at end of life with best achievable technologies at the time of replacement; and
- Purchasing local and high-quality offsets to compensate for remaining emissions.

#### 7.4.4 Solid, Liquid and Hazardous Waste

During the construction of the Project, wastes produced will either be disposed of or will be reused or recycled where feasible in accordance with applicable regulations.

As described in Section 3.4.2, GCT has an EMS for GCT Deltaport that will be updated to incorporate DP4. The EMS includes EOPs specifically for the management of wastes, including designated roles and responsibilities and instructions for the safe, environmentally responsible and economical storage and disposal of hazardous and non-hazardous waste streams. Waste streams from DP4 will be very similar to existing waste streams in the Port managed by GCT for which all the necessary procedures and permits are already in place to manage and comply with waste requirements during operations. Accidental release of any wastes will be managed through a spill response and emergency response procedure in accordance with regulatory requirements and GCT policies.

There will be no discharge or offloading of waste from vessels at the new berth, consistent with the existing EMS and GCT Canada Vessel Manual.

As the Project design evolves, further clarity on the quantity of water the Project is expected to utilize will be determined and such information will be included in the Impact Assessment.

Solid, liquid and hazardous waste generated during the life of the Project is summarized in Table 19.

**Table 19: Potential Solid, Liquid and Hazardous Waste for the Project.**

Waste Type	Waste Examples	Potential Mitigation	Project Phase
Solid Waste	<ul style="list-style-type: none"> <li>Packing materials from the shipping of Project components for construction.</li> <li>Materials from overpass demolition.</li> <li>Construction waste, including wood, metal and concrete.</li> <li>Municipal waste, including paper, plastics and glass during both construction and operations.</li> <li>Soil and material excavated from the Project footprint</li> <li>Non-hazardous solid waste</li> <li>Dredge Waste</li> </ul>	<p>Waste management plan for segregation and recycling schemes during construction.</p> <p>Waste management requirements under existing GCT Deltaport EMS.</p>	<ul style="list-style-type: none"> <li>Construction</li> <li>Operations</li> </ul>
Liquid Waste	<ul style="list-style-type: none"> <li>Domestic wastewater from office and terminal facilities, including washrooms, during operations.</li> </ul>	<p>Treated and effluent discharged under the existing <i>Environmental Management Act</i> waste discharge permit (PE-14865), which will be amended for an increase in volume, as required.</p> <p>There is no liquid waste discharge from vessels berthed at GCT Deltaport.</p>	<ul style="list-style-type: none"> <li>Operations</li> </ul>

**Table 19: (Cont'd.)**

Waste Type	Waste Examples	Potential Mitigation	Project Phase
Hazardous Waste	<ul style="list-style-type: none"> <li>Waste oils, petroleum products and solvents.</li> <li>Batteries.</li> <li>Oil filters.</li> <li>Chemical cleaning fluids.</li> <li>Paints.</li> <li>Antifreeze.</li> </ul>	<p>Hazardous waste management within Waste Management Plan for construction, including storage, transportation and disposal requirements.</p> <p>Waste management requirements under existing GCT Deltaport EMS, including reduction.</p>	<ul style="list-style-type: none"> <li>Construction</li> <li>Operations</li> </ul>
Stormwater	<ul style="list-style-type: none"> <li>Discharges of stormwater resulting from precipitation.</li> </ul>	<p>Stormwater management system and discharge as per the existing EMS. The system will be upgraded for an increase in area and flow, as required.</p> <p>Additional mitigations to avoid increased contaminant or sediment concentrations in stormwater discharge during construction will be detailed in the Construction Environmental Management Plan.</p>	<ul style="list-style-type: none"> <li>Construction</li> <li>Operations</li> </ul>

## 7.5 Potential Socio-economic Effects

The economic effects of the Project are expected to be mostly beneficial, as the Project will generate new employment and contracting opportunities. Direct employment opportunities are anticipated in trades and related occupations, with some opportunities in professional occupations such as engineering. Indirect employment and contracting opportunities will be generated through businesses that supply goods and services to the Project. Situated within a mixed urban economy with a large, diverse, and dynamic labour market the Project is unlikely to cause adverse (i.e., upward) pressure on wages or rents for local businesses in Delta. GCT had an initial economic study conducted in 2020 to examine the projected economic impacts of the construction and operation of DP4 (MNP 2020). A further economic analysis will be completed to better assess the Project’s contribution to the local and regional economy as the Project progresses.

Increased road and marine traffic, as well as construction-induced closures and detours, may impact access to land and marine areas outside of the existing GCT Deltaport secured site area, which may limit the public’s ability to use these areas for social, cultural, and/or economic purposes.

Although outside the care and control of GCT, increased road, rail and marine traffic, as well as construction-induced closures and detours, may temporarily impact access to land and marine areas, outside of the existing GCT Deltaport secured site area, used for recreational and commercial activities. Tsawwassen First Nation and Delta residents have expressed concerns over traffic congestion due to the road and rail (crossings) traffic associated with the Roberts Bank terminals. A traffic impact assessment will be conducted to better understand changes in traffic volumes, identify mitigation measures, and determine the required improvements to transportation infrastructure, in collaboration with municipal governments, Indigenous nations, the BC Ministry of Transport and Infrastructure, and the rail companies. Traffic management plans will be developed for construction and operations.

The Project supports the National Trade and Transportation Corridor Initiative to build stronger, more efficient transportation corridors to international markets, and is aligned with the Provincial commitment through supporting guidance and policies to continually improving western trade corridors and encouraging investments that will help importers and exporters get goods to market, quickly and efficiently. The proposed DP4 Project is also aligned with Metro Vancouver’s Regional Growth Strategy, the economic development objectives of the City of Delta, and the general directions set out in the Tsawwassen First Nation Land Use Plan for industrial lands. According to the Greater Vancouver Board of Trade, the Pacific Gateway is estimated to support over CAD 32 billion in Canadian GDP, including nearly CAD 3 billion for BC alone, and notes that adequate port capacity is of national importance.

Potential socio-economic effects are summarized in Table 20.

**Table 20: Potential Socio-economic Effects.**

Component of Human Environment	Potential Effect	Activities and Anticipated Pathway of Effect	Potential Mitigation
Employment, and economy	<ul style="list-style-type: none"> <li>Change in the local labour force.</li> <li>Change in local levels of employment and income.</li> <li>Change in levels of local business activity and business revenue.</li> </ul>	<ul style="list-style-type: none"> <li>Project expenditures, employment and contracting during construction and operation will result in increased levels of local employment and income, as well as local business growth.</li> </ul>	<ul style="list-style-type: none"> <li>Develop an employment and procurement plan to prioritize local employment and contracting.</li> <li>Conduct livelihood assessment as part of GBA+. Develop an employment and procurement plan that considers temporary alternative livelihood strategy and maximizes Indigenous employment and business opportunities.</li> </ul>
Resource use	<ul style="list-style-type: none"> <li>Changes in access to resources and levels of income for Indigenous peoples.</li> </ul>	<ul style="list-style-type: none"> <li>Project activities may temporarily restrict access to marine resources that act as a source of income and household sustenance.</li> </ul>	<ul style="list-style-type: none"> <li>Temporarily restrict access only to those areas that present a risk to public health and safety.</li> </ul>
Infrastructure and services	<ul style="list-style-type: none"> <li>Change in access to areas used for recreational and commercial activities, e.g., crab fishing.</li> <li>Changes in land transportation related activities.</li> </ul>	<ul style="list-style-type: none"> <li>Transportation and navigational closures and detours during construction may temporarily limit access to marine areas used for recreational and commercial activities.</li> </ul>	<ul style="list-style-type: none"> <li>Develop a traffic management plan to monitor and control traffic.</li> <li>Temporarily restrict access only to those areas that present a risk to public health and safety.</li> </ul>

**Table 20: (Cont'd.)**

Component of Human Environment	Potential Effect	Activities and Anticipated Pathway of Effect	Potential Mitigation
Infrastructure and services (Cont'd.)	<ul style="list-style-type: none"> <li>Changes in access to critical infrastructure (e.g., major highway).</li> <li>Changes in demand for and access to social infrastructure and services.</li> </ul>	<ul style="list-style-type: none"> <li>May temporarily restrict free movement.</li> <li>May temporarily impact the movement of goods and access to essential services (e.g., school, hospital).</li> </ul>	

As part of the socio-economic assessment, GCT will also work to identify interests and factors for discussion towards inclusion to the potential social impacts of the Project as per the GBA+. The GBA+ is an intersectional analytical process for examining how various intersecting identity factors impact the effectiveness of government initiatives. It involves examining disaggregated data and research, and considering social, economic, and cultural conditions and norms. GCT will review culturally relevant research and consultation will be conducted to obtain inclusive quantitative and qualitative data, disaggregated, at minimum, by sex, gender, age and disability. As part of this analysis, linkages between inequalities at different community levels may be examined, including vulnerable populations and inequalities across several domains (e.g., employment, access to health care, etc.). Results of the GBA+ can be used to a) develop a more comprehensive and inclusive characterization of socio-economic conditions (baseline); b) develop a more fulsome characterization of potential impacts, ensuring that impacts on vulnerable groups are understood and addressed throughout the assessment process; c) design more targeted mitigation and enhancement measures, that take into consideration potential socio-economic participation barriers and ensure equitable distribution of economic benefits and opportunities generated by the Project; and d) enable a more inclusive and meaningful engagement.

Although outside the care and control of GCT, there is a potential for upgrades to the railway that could affect the ALR, specifically the ALR Option Lands along Deltaport Way that have already been designated for future rail right-of-way. The rail upgrades required to support DP4 have not yet been assessed. GCT will continue to liaise with the rail companies, who would be responsible for the construction and operation of any upgrades.

Further details of these effects and potential mitigations strategies are discussed in Section 7.4 (atmospheric emissions), Section 7.9 (public and environmental safety) and Section 7.11 (potential cumulative effects).

## 7.6 Potential Effects on Human Health and Community Wellbeing

Human health values include air quality, drinking water quality, soil quality, noise and vibration, light pollution and accidents or malfunctions (DFO and Environment Canada 2006). The Project may result in adverse effects on human health through increased levels of air contamination, increased presence of dust and particles, and increased levels of noise, vibration and night-time lighting. The latter may result in rest and sleep disruptions which can be associated with increases in stress levels and adverse impacts on mental health. Malfunctions and accidents could potentially impact worker and public health and safety. Sensitive receptors will be identified as part of the noise assessment which will be completed in accordance with relevant Health Canada criteria, provincial and federal Guidelines and municipal bylaws.



A determinants of health approach may be used to conduct the health impact assessment (HIA), as part of the socio-economic impact assessment, informed by the findings of the GBA+. Health impacts may be examined under human health (focusing on biophysical aspects of health and human health risk assessment) and social determinants of health (focusing on socio-cultural aspects).

Potential human health effects are summarized in Table 21.

**Table 21: Potential Effects on Human Health and Community Wellbeing.**

Component of Human Environment	Potential Effect	Activities and Anticipated Pathway of Effect	Potential Mitigation
Human health	<ul style="list-style-type: none"> <li>Changes in physical health risks</li> <li>Change in mental health risks</li> <li>Change to public health and safety</li> </ul>	<ul style="list-style-type: none"> <li>Exposure to air emissions during DP4 construction and operation and through incidental activities, such as marine shipping and rail and road transportation, may affect human health and a general sense of well-being.</li> </ul>	<ul style="list-style-type: none"> <li>Develop environmental management and monitoring plan to monitor and control emissions and discharges to soil and water.</li> <li>Develop an occupational health and safety plan and a public health and safety plan to monitor and control levels of noise and light emissions.</li> <li>Develop protocols and procedures to prevent and manage malfunctions and accidents.</li> <li>Collaborate with municipal governments, Indigenous nations, BC Ministry of Transport and Infrastructure, and the rail companies to implement infrastructure upgrades and operational plans to manage increases in shipping, rail, and road transportation.</li> </ul>
Visual	<ul style="list-style-type: none"> <li>Change in viewscape</li> </ul>	<ul style="list-style-type: none"> <li>Expansion of terminal and additional infrastructure equipment, (e.g., cranes) and changes to the causeway overpass improvements.</li> </ul>	<ul style="list-style-type: none"> <li>Expansion of the existing terminal reduces the change in viewscape.</li> <li>Selection of equipment and infrastructure design to further reduce effects on viewscape.</li> </ul>

**Table 21: (Cont'd.)**

Component of Human Environment	Potential Effect	Activities and Anticipated Pathway of Effect	Potential Mitigation
Social determinants of health	<ul style="list-style-type: none"> <li>Changes in mental health and sense of well-being</li> <li>Changes in income and financial stability and well-being</li> <li>Changes in lifestyle and behaviour</li> <li>Changes in social cohesion and support networks</li> </ul>	<ul style="list-style-type: none"> <li>Increased levels of noise and vibration, traffic congestion and night-time light pollution may cause disturbance and disrupt rest and sleep, which, in turn, may affect mental and physical wellness.</li> <li>Construction may temporarily restrict and/or disrupt freedom of movement, impacting routine activities, access to neighbours, recreational areas and community facilities and services outside of the existing GCT Deltaport secured site area.</li> <li>Availability of new employment and business opportunities and an increased level of income may exacerbate existing socio-economic inequalities.</li> </ul>	<ul style="list-style-type: none"> <li>Develop an occupational health and safety plan and a public health and safety plan to monitor and control levels of noise and light emissions.</li> <li>Develop construction management and monitoring plan, and traffic management plan to monitor and control the movement of materials and equipment and minimize blockage and congestion.</li> <li>Based on findings of GBA+, develop an equitable hiring plan.</li> </ul>

## 7.7 Potential Effects on Heritage Resources

Project activities, e.g., excavation or dredging, during construction may result in disturbance and/or destruction of heritage resources. Potential effects to Heritage Resources are summarized in Table 22.

GCT is committed to working with Indigenous nations and regulators to develop appropriate mitigation and monitoring plans to address potential Project effects, including those related to physical and cultural heritage resources.

Management plans, chance-find procedures, crew training and qualified monitors will be in place in accordance with requirements of the Archaeology Branch of FLNRORD and Parks Canada, as appropriate, to ensure no unintentional destruction or disturbance of heritage resources. Although not anticipated, if an archaeological site is encountered within the proposed DP4 Project footprint, the Project will proceed, at minimum, with procedures in accordance with conditions of a Section 12.4 Alteration permit under the *Heritage Conservation Act*. Any permitted alteration or mitigation of the site will be done with appropriate levels of consultation and collaboration with Tsawwassen First

Nation, the Musqueam Indian Band, the Tsleil-Waututh Nation, Semiahmoo First Nation and other Indigenous nations, to develop appropriate mitigations to address potential heritage effects. The Project will also comply with the requirements of the City of Delta’s bylaws for Designated Heritage Properties, as appropriate.

**Table 22: Potential Effects on Heritage Resources of the Project.**

Heritage and Culture Component	Potential Effect	Activities and Anticipated Pathway of Effect	Potential Mitigation
Physical and cultural heritage	<ul style="list-style-type: none"> <li>Damage, disturbance or destruction of sites or materials.</li> </ul>	<ul style="list-style-type: none"> <li>Construction activities (e.g., excavation or dredging) may impact the integrity of sites or materials pertaining to physical and cultural heritage.</li> </ul>	<ul style="list-style-type: none"> <li>Avoid sites with potential physical and cultural heritage value.</li> <li>Conduct AOA in accordance with the Guidelines and Objectives set forth in AOA as General Land Use Planning Tools – Provincial Standards and Guidelines (2009) and measures presented by Parks Canada, as appropriate.</li> <li>Influenced by AOA findings and if deemed necessary, conduct AIA.</li> </ul>
Any structure, site or thing that is of historical, archaeological, paleontological or architectural significance	<ul style="list-style-type: none"> <li>Damage, disturbance or destruction of structure, site or thing of significance.</li> </ul>	<ul style="list-style-type: none"> <li>Construction activities (e.g., excavation or dredging) may impact the integrity of any structures of importance</li> </ul>	<ul style="list-style-type: none"> <li>Conduct AOA to determine the presence of structure, site or thing of potential cultural significance. If presence is detected, avoid structure, site or thing. Conduct AIA, if deemed necessary.</li> </ul>

### 7.8 GCT’s Preliminary Understanding of Potential Effects on Indigenous Interests from Project Activities

This section identifies the updated potential effects the Project may have on Indigenous Interests. The term Indigenous Interests is used in accordance with both provincial and federal regulations. As outlined in section 22 (1)(c) of the *Impact Assessment Act*, an assessment is required on the impact that a Project may have "on any Indigenous group and any adverse impact that the designated project may have on the rights of the Indigenous peoples of Canada recognized and affirmed by section 35 of the *Constitution Act, 1982* (Government of Canada 2019, 19)." Section 2(2)(b) of the *Environmental Assessment Act* (British Columbia) requires an assessment on "those interests related to an Indigenous nation and their rights recognized and affirmed by Section 35 of the Constitution Act, 1982, including Treaty rights and Aboriginal rights and title, that may be impacted by a proposed project (BCEAO 2020, p. 48)."

GCT drew its updated understanding of the Project’s potential effects on Indigenous Interests from the information provided by Indigenous nations during Project-specific engagement activities, from regulatory guidance, the JSOIE, and the potential Project effects which Indigenous nations identified in their notices to engage as PINs. GCT’s Impact Assessment will assess the Project’s potential effects on Indigenous Interests identified by Indigenous nations. The potential effects listed in Table 23 are presented in aggregate. Specific information relating to the ways each Indigenous nation has identified and understands the Indigenous Interests will be presented in the Joint Guidelines.

Incidental Project activities (i.e., marine shipping, and road/rail transportation) may also affect health, social and economic conditions for Indigenous nations and will be further explored through the Impact Assessment. GCT is committed to continued engagement and consultation with Indigenous nations, including to better understand how they may be affected through all phases of the Project. A cumulative effects assessment will also be completed as stated in Section 7.11 with consideration to the effects of Indigenous rights and interests to be informed by further engagement with Indigenous groups.

**Table 23: Preliminary Identification of Potential Effects to Indigenous Interests Resulting from Project Activities.**

Indigenous Interest	Potential Effect	Project Phase	
		Construction	Operations
Harvesting and Subsistence Activities	Effects of the Project on Indigenous rights to harvesting enshrined in historical and modern treaties and the Constitution.	X	X
	Effects on harvesting for Food, Social, and Ceremonial purposes.	X	X
	Effects on historical and contemporary preferred harvesting sites and accessibility of culturally important harvesting sites.	X	X
	Changes to the abundance, distribution or quality of resources relied upon to engage in harvesting and subsistence activities.	X	X
	Effects of the Project on current and future availability, quality, and quantity of country foods.	X	X
Cultural Use Sites and Areas	Effects of Project activities on the cultural and ceremonial use of areas in and around the Project area.	X	X
	Physical disturbance of cultural, heritage, archaeological, paleontological, and architectural sites, including through changes to: <ul style="list-style-type: none"> <li>Physical and cultural heritage;</li> <li>Access to physical and cultural heritage;</li> <li>Cultural value, spirituality, or importance associated with physical and cultural heritage; and</li> <li>Sacred, ceremonial culturally important places, objects, or things, including languages, stories and traditions.</li> <li>Visual aesthetics over the life of the Project and post-Project abandonment or decommissioning.</li> </ul>	X	X

**Table 23: (Cont'd.)**

Indigenous Interest	Potential Effect	Project Phase	
		Construction	Operations
Cultural Use Sites and Areas (Cont'd.)	Effects of increased marine traffic on the access and use of culturally important marine environments.	X	X
	Effects of the Project on the use of travel ways, navigable waterways, and water bodies.	X	X
Cultural Continuation	Increased disruption to the protection, and persistence of Indigenous culture.	X	X
	Effects on the cultural practice of distributing food to community members and Elders.	X	X
	Effects of Project activities on the interruption of intergenerational transmission of IK.	X	X
	Changes to the ability to fish, hunt, trap and gather for cultural or ceremonial activities and practices.	X	X
	Effects on the cultural continuation of food sovereignty.	X	X
	Effects on Indigenous culture and teachings linked to the health and persistence of culturally important species, including SRKW.	X	X
Indigenous Governance Systems	Effects of Project-related shipping traffic on Indigenous Interests.		X
	Effects on Indigenous nations' ability to govern and safely access Indigenous marine territory	X	X
	Changes in the ability to manage and make decisions in accordance with traditions, cultures, governance, and/or practices, now and in the future.	X	X
	Effects on Indigenous nations' ability to practice Indigenous law.	X	X
Economic Activities	Effects on Indigenous and economic rights to marine fisheries and commercially licensed fishing, hunting, trapping, and gathering.	X	X
	Economic losses from Project effects on harvesting.	X	X
	Economic benefits from the Project through business opportunities and employment.	X	X
Indigenous Health and Wellbeing	Changes to the experience when exercising an Indigenous Interest, including the presence of visual disturbances, changes in air quality, effects of vibrations, and acoustic disruption.	X	X
	Effects on Indigenous health due to: <ul style="list-style-type: none"> <li>• Changes in harvesting and subsistence activities;</li> <li>• Changes in air quality and water quality; and</li> <li>• Effects of vibrations and acoustic disturbance.</li> </ul>	X	X

As summarized above, changes to the environment that may affect traditional activities of Indigenous nations in the area include changes to the terrestrial and marine environment and associated resources. Construction of DP4 could alter nearby marine habitats not previously impacted by current and past port or ferry facilities. Nearby vegetation may be altered or affected by site activities. This could, in turn, impact mammals, birds, or fish traditionally or currently used for food. Noise and light from the site could impact nearby animal populations, which in turn, could affect Indigenous nations' right to hunt or fish. Light and sound from the site, while a historic disturbance, may also affect the cultural uses of nearby sites by Indigenous nations. GBA+ will also be considered in the potential effects on Indigenous Peoples.

Continued urbanization and increased trade, the driving forces behind the global expansion in container port activity, may place health pressures on Indigenous nations. Sources of diet and access to traditional subsistence foods could be placed under increased stress if not properly managed. Only by working with Indigenous nations can GCT identify these effects and work to minimize the effects on the communities. As identified in Section 8, GCT has undertaken a focused effort during the early engagement phase in reaching out to the 33 identified Indigenous nations potentially affected by the Project to provide Project information and better understand their interests and concerns and how GCT can best work with Indigenous nations throughout the Impact Assessment.

GCT's understanding of the Projects' potential effects on Indigenous Interests will evolve as GCT continues to engage with Indigenous nations throughout the Impact Assessment process. GCT is committed to continued engagement with Indigenous nations and consideration of their input as it relates to Project design, mitigation and management, and potential opportunities. The incorporation of a fishing boat marina, identified as a Project component in Section 3.4 is an example of working with Indigenous nations to identify ways to accommodate fishing and other activities, where access to deeper water is not tide-bound, which is currently a limiting factor.

## **7.9 Public and Environmental Safety**

GCT is a majority-owned Canadian company and as a leader in the shipping industry, GCT is committed to making sustainability a priority — this is the foundation of our Global Commitment Program, which reflects our dedication to the environment, safety, and community and the development of best practices in ESG performance. GCT has operated the GCT Deltaport since it first opened in 1997. No major malfunctions or accidents have occurred during operation including the last DP3 construction completed in 2010. GCT acknowledges the proposed Project must consider the potential effects of malfunctions and accidents that may occur in connection with the proposed Project and outline the preventative measures, response plans, mitigations and resources in place to respond to an incident.

GCT will provide additional details on potential malfunctions or accidents which could occur in connection with the Project, the potential environmental effects of a project related to a malfunction or accident, and mitigation measures that can be implemented as part of the Project design.

### **7.9.1 Project Updates and Changes**

Early engagement feedback opportunities provided by GCT as well as the Joint Summary of Issues Engagement report provided by the IAAC and the BCEAO on December 23, 2020, identified issues related to malfunctions, accidents and public safety. The issues raised include collisions, grounding, allision and spills from vessel fuel or containers in the marine environment, as well as accidents related to road and rail transport, operation of land-based machinery and land-based spills. Issues identified during early engagement activities and the proposed related Project decisions are provided in Appendix C.

GCT recognizes the great interest in the marine shipping aspects of the proposed Project. Early engagement opportunities have highlighted key concerns related to the scope of the assessment and consideration of factors surrounding potential malfunctions and accidents. These factors will be described in the Joint Guidelines for the Project as noted in previous Sections 1 and 2, and additional consultation opportunities on the Joint Guidelines will also be provided by GCT, IAAC and BCEAO.

The following sections provide updates in accordance with the BCEAO’s DPD guidelines for information regarding Public and Environmental Safety. This includes a description of potential Project-related scenarios where there is a real or perceived risk of a malfunction or accident, and an identification of moderate to high-risk potential malfunctions or accidents associated with the proposed Project as well as a preliminary assessment of how they will be managed.

The Impact Assessment will consider the potential malfunctions and accidents that may occur due to the construction and operational aspects of the Project at GCT Deltaport, the potential effects of such incidents, and the implementation of mitigation measures specific to the design of the project.

### 7.9.2 Accident or Malfunction Scenarios

Table 24 provides a preliminary summary of potential project-related scenarios where there is a real or perceived risk of a malfunction or accident, potential effects, and initial identification of which malfunctions or accidents have a moderate to high-risk potential with the proposed Project. Initial identification of the moderate to high-risk potential is based on GCT’s experience from existing operations since 1997 and experience through previous construction activities, such as the DP3 Project.

For the purposes of the DPD, risks were considered qualitatively and categorized according to the probability of occurrence and impact. As part of the Impact Assessment, the potential malfunction and accident list, approach and outcomes will be further quantified and evaluated and as such the ratings below may change.

**Table 24: Preliminary Project Accident or Malfunction Scenarios.**

Accident or Malfunction	Potential Effect	Risk <sup>1</sup>
Fuel or other spill or leak during construction or operations that enters the marine environment.	<ul style="list-style-type: none"> <li>Effects on fish, fish habitat, migratory birds, (e.g., reduction in water quality or smothering) and current use of lands and resources for traditional purposes.</li> </ul>	Moderate (During construction) Low (During operations)
Fuel or other spill or leak during construction or operations to land.	<ul style="list-style-type: none"> <li>Effects to soils (during construction) and potential effects to marine sediments, fish, fish habitat, migratory birds and current use of lands and resources for traditional purposes in the event that a spill reaches the storm drainage systems.</li> </ul>	Low

<sup>1</sup> Risk is the evaluation of likelihood and consequence.

**Table 24: (Cont'd.)**

Accident or Malfunction	Potential Effect	Risk <sup>1</sup>
Vessel grounding, foundering, allision, or collision during construction or operations	<ul style="list-style-type: none"> <li>Effects to fish, fish habitat, migratory birds, (e.g., reduction in water quality or smothering) and current use of lands and resources for traditional purposes, either from physical destruction or compaction or release of fuel or other spill.</li> </ul>	Low
Vessel strike during construction or operations	<ul style="list-style-type: none"> <li>Effects (injury or death) on cetaceans (whale, dolphin or porpoise).</li> </ul>	Low
Land-based fire or explosion	<ul style="list-style-type: none"> <li>Effects on human health (injury) and short-term changes to air quality and effects to fish and fish habitat.</li> </ul>	Low
Vessel fire or explosion	<ul style="list-style-type: none"> <li>Effects on air and fish, fish habitat and potential for human injury.</li> </ul>	Low
Container handling accident resulting in a spill	<ul style="list-style-type: none"> <li>Effects on marine sediments, fish, fish habitat, migratory birds and current use of lands and resources for traditional purposes in the event that a spill reaches the storm drainage systems.</li> </ul>	Low
Motor vehicle or equipment accident	<ul style="list-style-type: none"> <li>Resulting in human injury or spill</li> </ul>	Low (during construction) Moderate (during operation)
Train collision or derailment	<ul style="list-style-type: none"> <li>Resulting in human injury or spill</li> <li>Effects on fish and fish habitat</li> </ul>	Low (during construction) Low (during operation)

### 7.9.3 Potential Accidents and Malfunctions Scenarios and Mitigation

As noted above, this is a preliminary list of Project-related scenarios where there is a real or perceived risk of a malfunction or accident based on GCT’s history and experience as an operator and previous construction activities at GCT Deltaport and is not intended to be an exhaustive list. As the Project proceeds through the Impact Assessment process, a more detailed analysis of the risks of malfunctions and accidents will be undertaken.

#### ***Fuel or Other Spill to Land or Water***

During construction, various potential malfunctions or accidents could occur resulting in fuel or other spills to land or water. These include, but are not limited to, spills during refuelling, equipment malfunction resulting in the release of petroleum products (e.g., fuel, oil, lubricant or hydraulic fluid), or improper storage or poor materials handling. The Construction Environmental Management Plan will include detailed mitigation measures and emergency response procedures in the event of a spill or unauthorized release during construction.

<sup>1</sup> Risk is the evaluation of likelihood and consequence.



The supply and transfer of fuel, lube oil, diesel, gasoline or any other petroleum product (bunkering or fueling) are not permitted for ocean-going vessels or support tugs at Roberts Banks (VFPA 2021). Potential accidents during operations are related to the fueling of terminal equipment, equipment malfunction resulting in the release of petroleum products (e.g., fuel, oil, lubricant or hydraulic fluid) or spills resulting from storage and handling. As noted below, GCT has an existing Emergency Response Plan for the operational aspects of GCT Deltaport which is reviewed and updated annually. In addition, GCT has contracts with Quantum Murray Environmental (Emergency Response) and contracts with Western Canada Marine Response Corporation (WCMRC) for 24- hour response, mitigation and clean-up.

### ***Vessel Grounding, Foundering, Allision, or Collision***

In GCT's experience, based on the similar construction activities that occurred for DP3, the likelihood or probability of a vessel grounding, foundering (taking on water or sinking) allision (one vessel runs into another or an object) or collision (two vessels colliding) during construction is low. The Project's Construction Environmental Management Plan and Emergency Response Plan will be implemented by all contractors. In addition, each contractor will be required to provide the Canadian Coast Guard with a Notice to Mariners in advance of their work to reduce the potential of an accident between Project-related and non-Project-related vessels.

During operations, the potential for an allision or grounding event near the DP4 berth with minor consequences has a higher likelihood of occurrence than an accident with more serious consequences. This generally occurs during berthing or de-berthing and typically involves a type of engine failure, equipment malfunction or human error. Practices and procedures pursuant to the *Canada Marine Act* to promote safe and efficient navigation within VFPA navigational jurisdiction<sup>1</sup> are documented within the Port Information Guide (VFPA 2021). Under the *Pilotage Act*, every commercial vessel over 350 gross tonnes must have a certified BC Coast Pilot on board while operating within the port. The proximity of the tug basin at the GCT terminal provides further readily available assistance to prevent or minimize the impact of an allision should a vessel encounter issues.

The federal government, led by Transport Canada, has the legislative jurisdiction over navigation and shipping for the marine shipping route identified for the DP4 Project, while the VFPA has jurisdiction in the immediate area around the GCT Deltaport terminal. The *Canada Shipping Act* regulates marine transportation and incorporates international shipping conventions developed by the International Maritime Organization. Regulations under the act that support safe navigation within Canadian waters include the Vessel Traffic Services Zones Regulations, Collision Regulations, Navigation Safety Regulations, Vessel Pollution and Dangerous Chemical Regulations, and Ballast Water Control and Management Regulations. In 2016, the Prime Minister announced the Government of Canada's Ocean Protections Plan initiative. The initiative covers many coastal aspects, including improving Canada's marine safety system and response strategies in collaboration with various Indigenous communities on the West Coast of Canada. Transport Canada is the overall federal leading agency of the plan.

Although GCT does not directly have responsibility or care and control of potential shipping-related incidents after vessels leave the facility, as noted earlier, they have existing contacts with WCMRC to respond to marine-related incidents in the vicinity of the DP4 Project area. GCT's existing operational Emergency Response Plan, in particular,

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<sup>1</sup> The VFPA's administrative, permitting and other powers with respect to the DP4 Project, including those related to port operations, are currently the subject of judicial review.

the spill prevention and response will be updated in accordance with relevant legislation and regulatory requirements and in alignment with relevant initiatives in the DP4 Project area.

### ***Motor Vehicle or Equipment Accidents***

As noted in Section 3.4.4 and 3.8, Project-related traffic (vehicles, trucks) is anticipated to increase over the construction and operational periods of the Project, therefore it is anticipated the potential for overall vehicle collision rates may increase. Onsite, GCT's existing safety protocols and procedures, such as a speed limit of 20 km/h, reduces the risk of worst-case scenario vehicle and equipment accidents. All contractors will be required to develop a health and safety plan for their component of work, in accordance with GCT's Health and Safety Policies and Procedures and applicable legislation.

As noted below, GCT's Emergency Response Plan also considers major vehicle or equipment accidents during operations and was developed in coordination with local emergency services (fire, police and ambulance).

### **7.9.4 Mitigation and Management**

GCT Deltaport currently has a comprehensive Emergency Response Plan that encompasses potential major malfunctions and accidents, including defined strategies to prevent and mitigate environmental impacts associated with emergency events. The Emergency Response Plan was developed in conjunction with the site safety committee, Delta Fire, Delta Police, the VFPA and covers all applicable Federal, Provincial, and Municipal regulations. The Emergency Response Plan is reviewed and updated annually. In November 2019, GCT also participated in the first of several workshops hosted by the VFPA aimed at improving port-wide response to emergency situations involving container ships. GCT remains committed to participating, as appropriate, in initiatives and workshops related to marine shipping and emergency response.

The design, construction and ongoing operation and maintenance of the Project will meet all stringent codes, regulatory standards and requirements. Hazard identification, hazard and operability studies, and safety integrity studies will be conducted during each phase of engineering and design. Prior to the construction of the Project, all contractors will also be required to develop their own Emergency Response Plans that are aligned with and approved by GCT.

As per GCT's Emergency Response Plan, ongoing training, drills and practice emergency exercises are carried out with the site workforce, safety committees and emergency responders to ensure plans are understood and effective. Additionally, GCT has a contract with Quantum Murray Environmental (Emergency Response) and contacts with WCMRC (Transport Canada's Certified Marine Spill Response Organization) for 24- hour response, mitigation and clean-up in circumstances where there is potential for a hazardous spill or leak.

While there may be a risk of an accident or malfunction associated with the Project, the track record of the existing operations, augmented by the spill containment design of the proposed Project suggests that procedures to guard against such malfunctions and accidents will be effective.

## 7.10 Effects of the Environment on the Project

Through the Impact Assessment, the potential effects of the environment on the Project will be considered. This includes both short-term, potentially weather-related construction effects and long-term climate change and associated sea-level rise potential effects.

The selection of Project-specific VCs will take into consideration comments collected during early engagement activities and are summarized in the Joint Summary of Issues. Engagement activities are summarized in Section 2. These concerns and the Project decisions relating to them are summarized and provided in Appendix C.

### ***Seismic activity***

Seismic activity on the west coast of Canada is common and each year the Geological Survey of Canada records more than 1,000 earthquakes in western Canada. The Pacific Coast is the most earthquake-prone region of Canada. The Project area is located in one of the areas of higher seismic risk designations in BC (Natural Resources Canada 2018). Seismic activity in the Lower Mainland is primarily related to the interaction between the Juan de Fuca Plate and the North American Plate. The largest type of earthquake-related plate movement is called a subduction quake where, in this case, the Juan de Fuca Plate is moving toward and underneath (or subducting) the North American Plate along the Cascadia Subduction Zone.

The Cascadia Subduction Zone is located approximately 100 km west of Vancouver Island. The last subduction earthquake in this zone was in January 1700. The range of recurrence, however, varies from 300 years to 800 years.

Design parameters and mitigation measures for the Project will include consideration of potential seismic effects. The assessment will consider seismic design criteria and site geology for Project construction and structure and component design. Past work and studies in the area have resulted in a great depth of knowledge of existing conditions within the Project area.

### ***Tsunamis***

The risk of Tsunamis for the Lower Mainland and Roberts Bank from seismic events that occur off the coast of Vancouver Island is low. However, there is a risk of tsunamis generated as a result of an undersea landslide occurring within the Salish Sea due to the presence of unconsolidated sediments in the vicinity of Roberts Bank. There have been five such events since 1970 (Hemmera Envirochem Inc. 2012). The existing Roberts Bank Port facilities, including Westshore Terminals and the GCT Deltaport Container Terminal, have been in operation during the reported five previous undersea landslides at Roberts Bank, and no large waves have been recorded that have overtopped these terminals. Regardless, the Project will assess the potential effects of tsunamis regarding design, construction and operation.

### ***Climate change and related sea-level rise***

An increase in average global temperatures due in part to climate change is resulting in rising sea levels around the globe. In BC, sea level rise has occurred at a slower rate than the global average of 17 cm/century but is still observed to be 2.0 cm/50 years (The Arlington Group Planning + Architecture Inc., EBA, a Tetra Tech Company, DE Jardine Consulting, Sustainability Solutions Group October 2013).

A 2011 study for the Government of BC recommended sea level rise planning levels of 0.5 m (50 cm) to the year 2050, 1.0 m to the year 2100 and 2.0 m to the year 2200 (Ausenco Sandwell, 2011) These global values should also be adjusted for local vertical land motion (FLNRO 2018).

The Project's assessment will consider requirements such as design parameters in relation to potential sea-level rise, within the context of the existing GCT Deltaport terminal, GCT's ESG strategy and annual Enterprise Risk Management planning.

### ***Extreme weather and weather-related events***

Canada and the Lower Mainland have been experiencing more frequent and higher magnitude extreme weather-related events. Given the coastal location of the Project, increased precipitation, windstorms and storm surges along with predicted sea-level rise can lead to delays and issues for the Project both during construction and operations.

Storm surge is one of the more common coastal hazards associated with sea-level rise. A storm surge refers to a temporary increase in the seawater level during a storm due to extreme meteorological conditions such as low atmospheric pressure and/or strong winds. A storm surge is independent of tide levels, but the impact may be magnified if it occurs during high tide.

It is anticipated that climate change will cause more intense and frequent storms in the northern hemisphere and that sea-level rise will increase the coastal areas at risk from these events. The assessment for the Project will consider both design and construction aspects in relation to potential storms and extreme weather events.

## **7.11 Potential Cumulative Effects**

A cumulative effects assessment will be completed that considers the potential for residual effects of the Project on specific VCs (e.g., environmental, social, economic, cultural), combined with the effects of other past, current or reasonably foreseeable projects that overlap with the Project study areas. Other projects to be included in the cumulative effects assessment will be informed through additional engagement and may include, but are not limited to the following:

- BURNCO Aggregate Project, Gibsons, BC;
- VFPA's DPW Centerm Terminal Expansion, Vancouver, BC;
- Delta Grinding Facility Project, Delta, BC;
- George Massey Tunnel Replacement Project, Richmond and Delta, BC;
- Kinder Morgan Pipeline Expansion Project (a.k.a. Transmountain Pipeline), Burnaby, BC;
- Lehigh Hanson Aggregate Facility, Richmond, BC;
- Lions Gate Wastewater Treatment Plant Project, District of North Vancouver, BC;
- North Shore Trade Area Project - Western Lower-level Route Extension, West Vancouver, BC;
- Pattullo Bridge Replacement Project, Surrey and New Westminister, BC;
- Southlands Development, Delta, BC;
- Fortis Tilbury Phase 2 LNG Expansion and Marine Jetty Projects, BC

- Vancouver Airport Fuel Delivery Project, Richmond, BC; and
- Woodfibre LNG Project, Squamish, BC.

The cumulative effects assessment will incorporate the available information from these other projects and activities, and their anticipated effects. The assessment may also include potential trans-BC boundary effects, such as those associated with air quality or GHG emissions.

A detailed methodology for conducting the cumulative effects assessment and a rationale for the selection of other projects will be described in the Impact Assessment.

The proposed RBT2 project could meet the predicted demand in container capacity should it receive approvals, establish a sustainable business case, obtain a governmental borrowing limit increase, and identify a terminal operator. However, GCT is advancing the DP4 project pursuant to assessments that it can be the first to address market demands through a more sustainable and financially viable project. Therefore, the RBT2 project is not expected to be considered as part of the cumulative effects assessment for DP4 as both projects would not be required at the same time.

GCT also recognizes the interests raised through the early Engagement process regarding Indigenous interest in informing the scope of the cumulative effects assessment and will continue further engagement to better understand these interests. Further details regarding the scope will be provided in the Joint Guidelines.

## 7.12 Determination of Potential Effects

The determination of potential effects will be detailed as the Project progresses through detailed design and into the Impact Assessment process. The final determination of potential effects will be described in accordance with the guidance from the Effects Assessment Policy (BCEAO 2020). The following categories will be included in the determination of potential effects:

- Indirect Effects – Occur because of a change that a project may cause often produced away from or as a result of a complex effects pathway and are at least one step removed from a project activity in terms of cause-effect linkages.
- Direct Effects – Consequence of a cause-effect relationship between a project and specific VC.
- Positive Effects – Desirable or beneficial effects of the Project on environmental, social, economic, cultural and health attributes in the surrounding area.
- Negative Effects – Undesirable or adverse effects of the Project on environmental, social, economic, cultural and health attributes in the surrounding area.

## 7.13 Mitigation and Management Approaches

Mitigation measures and management approaches will be considered on the basis of technical and economic feasibility with the objective to avoid, minimize, restore, or otherwise offset potential effects within the Impact Assessment. GCT is committed to meaningful engagement with Indigenous groups, regulators, municipalities and with local agricultural businesses and the public for proposed mitigation measures as the Project progresses through the Impact Assessment process. Given the early stage of the Project, GCT has yet to begin determining detailed

mitigation measures but will consider implementing measures that have been shown to be effective in previous projects and are capable of integration into project design, compliance and best management practices such as:

- Developing design plans to minimize dredging activities;
- Consolidating construction activities to reduce the noise, light, air (including dust), marine mammal disturbances; and
- Adaptive management approaches.

## 7.14 Monitoring

Monitoring, follow-up reporting and adaptive management requirements will be determined as the Project progresses through the assessment process and is generally required as a condition associated with project approvals to ensure mitigation is effective. All monitoring will adhere to regulatory reporting and monitoring frequency requirements. Examples of monitoring plans may include, but will not be limited to the following:

- Marine Mammal Monitoring Plan
- Construction Environmental Management Plan
- Noise, vibration and light Management Plan
- Greenhouse Gas Management Plan
- Air Quality Management Plan
- Traffic Management Plan
- Habitat Offsetting Plan
- Emergency Response Plan
- Fish Habitat Offsetting Plan
- Dredge Management Plan
- Marine Access Management Plan
- Wildlife Management Plan
- Spill Prevention and Response Plan
- Operational Health and Safety Plan
- Marine Activities Management Plan

Additional Management Plans will be developed as required as the Project progresses through the regulatory process and detailed design.

## 8 INDIGENOUS ENGAGEMENT AND CONSULTATION

This section of the DPD describes GCT's engagement with Indigenous nations. The section details Project updates and changes (Section 8.1), provides an introduction to Indigenous engagement (Section 8.2), and describes the locations of Indigenous nations (Section 8.3).

### 8.1 Project Updates and Changes

Since the release of the IPD in September 2020, GCT made the following changes to expand and update the Indigenous engagement section of the DPD, respond to issues raised in the JSOIE, and meet BCEAO and IAAC requirements:

- Identification and information for the 33 Indigenous nations and organizations with potential interests in the Project has been consolidated in Section 8.3 to include the information provided in the IPD as well as any updates that were identified in the early engagement phase;
- Addition of Individual Sections 8.4.1 to 8.4.34, to summarize GCT's engagement, issues and Indigenous Interests raised by each of the 33 Indigenous nations or organizations identified in the JSOIE or through Project engagement activities;
- Section 8.5, summarizes the agreements GCT has made with Indigenous nations;
- Section 8.6, identifies GCT's preliminary consideration of Indigenous Interests in Project design; and
- Opportunities for GCT, Indigenous nations, IAAC, and the BCEAO to work together have been added to Section 8.7, which summarizes GCT's planned engagement activities moving forward.

### 8.2 Introduction

This section of the DPD describes GCT's engagement with Indigenous nations on the Project. In keeping with the language applied in the IAA, the term "Indigenous" has the meaning assigned by the definition of Aboriginal peoples of Canada in subsection 35(2) of the *Constitution Act, 1982*: "aboriginal peoples of Canada" includes Indian, Inuit, and Métis peoples of Canada (Legislative Services Branch, 2019).

Section 8.3 describes which Indigenous nations have been identified as having potential effects on their Indigenous Interests as a result of the proposed Project. In response to the issues identified in the JSOIE report, GCT has provided responses in Appendix C. Section 8.4 describes engagement to date with identified Indigenous nations, including key issues related to Indigenous Interests in the proposed Project.

Section 8.5 summarizes the agreements GCT has made with Indigenous nations. Section 8.6 summarizes GCT's preliminary consideration of Indigenous interests in Project design. Section 8.7 provides an overview of upcoming engagement activities and opportunities for collaboration with identified Indigenous nations.

### 8.3 Indigenous Nations

GCT has engaged with 33 Indigenous nations and organizations, which are listed below (BCEAO EPIC 2020).

As mentioned in Section 2.1, 16 of the 33 Indigenous nations and organizations identified in the JSOIE have submitted notices to engage as a PIN to the BCEAO (BCEAO EPIC 2020). Those nations have been indicated below with an asterisk.

- |   |   |
|---|---|
| 1. Cowichan Tribes*   | 20. Seabird Island First Nation   |
| 2. Ditidaht First Nation*   | 21. Semiahmoo First Nation  |
| 3. Esquimalt Nation (No'ilung Si'em 'i' sche'le'chu)*   | 22. Shxw'owhamel First Nation   |
| 4. First Nations of the Maa-nulth Treaty Society, which represents Huu-ay-aht First Nation, Ka:'yu:'k't'h'/Che:k'tles7et'h First Nations, Toquaht Nation, Uchucklesaht Tribe, and Yuuʔuʔiʔath Government* | 23. S'ólh Téméxw Stewardship Alliance, which includes member nations Aitchelitz First Nation, Chawathil First Nation, Cheam First Nation, Kwaw-kwaw-Apilt First Nation, Sumas (Semá:th) First Nation, Shxwhá:y Village, Skowkale First Nation, Skwah First Nation, Soowahlie First Nation, Skawahlook (Sq'ewá:lwx) First Nation, Sq'ewlets First Nation, Squiala First Nation, Tzeachten First Nation, Yakweakwioose First Nation, and Yale First Nation* |
| 5. Halalt First Nation*   | 24. Songhees First Nation   |
| 6. Katzie First Nation  | 25. Squamish Nation   |
| 7. Kwantlen First Nation  | 26. Stz'uminus First Nation*  |
| 8. Kwikwetlem First Nation  | 27. Tsartlip First Nation   |
| 9. Leq'á:mél First Nation   | 28. Tsawout First Nation  |
| 10. Lyackson First Nation*  | 29. Tsawwassen First Nation*  |
| 11. Malahat First Nation*   | 30. Tseycum First Nation  |
| 12. Matsqui First Nation  | 31. Tsleil-Waututh Nation*  |
| 13. Métis Nation British Columbia   | 32. T'Sou-ke First Nation*  |
| 14. Musqueam Indian Band*   | 33. Ts'uubaa-asatx (Lake Cowichan) First Nation   |
| 15. Pacheedaht First Nation*  |   |
| 16. Pauquachin First Nation*  |   |
| 17. Penelakut Tribe   |   |
| 18. Popkum First Nation   |   |
| 19. Sci'anew (Beecher Bay) First Nation*  |   |

An overview of each of the 33 Indigenous nations and organizations whose interests could reasonably be expected to be affected by the Project is provided below in subsections 8.3.1 to 8.3.34. The Indigenous nations and organizations are listed in alphabetical order for ease of readership. The nation-by-nation overview in Section 8.3 covers the following topics:



- Location of the nation;
- Location of traditional territory (where available);
- Location of reserves/treaty lands;
- Distance of administrative office to the Project location;
- Affiliations with other Indigenous nations and organizations for the purposes of the Project;
- Treaty status;
- Status of forestry agreements; and
- Status of implementation of the *First Nations Lands Management Act*.

### 8.3.1 Cowichan Tribes

The Cowichan Tribes are an Indigenous nation who, along with Halalt First Nation, Lyackson First Nation, Penelakut Tribe, and Stz'uminus First Nation, descends from the Cowichan Nation (Cowichan Tribes 2020). The traditional territory of the Cowichan Tribes includes the region around Cowichan Lake, the Cowichan and Koksilah River drainages, the areas around Shawnigan Lake, Maple Bay, and Cowichan Bay, the southern Gulf Islands, and the region of the South Arm and mouth of the Fraser River (Cowichan Tribes 2020).

GCT is engaging with Cowichan Tribes to determine areas where traditional activities are practiced relative to the Project location.

The Cowichan Tribes have nine reserves (Cowichan 1, Cowichan 9, Est Patrolas 4, Kakalatza 6, Kil-Pah-Las 3, Skutz 7, Skutz 8, Theik 2, and Tzart-Lam 5) (Indigenous and Northern Affairs Canada 2019). Cowichan 1, (2,291.3 ha) (located in the Cowichan and Quamichan districts), Cowichan 9 (17.9 ha) (located near the mouth of Koksilah River at the head of Cowichan Bay), Est-Patrolas 4 (27.8 ha) (located to the south of Cowichan Bay), Kil-Pah-Las 3 (20.6 ha) and Theik 2 (30.3 ha) (located on the south shore of Cowichan Bay), Kakalatza 6 (8 ha) and Tzartlam 5 (6.5 ha) (located on the Cowichan River), Skutz 7 (7.3 ha) (located on the Cowichan River at Skutz Canyon), and Skutz 8 (14.9 ha) (located at the head of Skutz Canyon) (Indigenous and Northern Affairs Canada 2019). Cowichan 1, the main community, is in Duncan. The administrative office is approximately 45 km from the Project.

The Cowichan Nation communities of Cowichan Tribes, Halalt First Nation, Lyackson First Nation, Penelakut Tribe, and Stz'uminus First Nation formed the Cowichan Nation Alliance (CNA) to pursue legal action to reclaim the historic Cowichan Nation village site of Tl'uqtinus and other nearby lands in areas that are now called Richmond and Delta (Woodward & Company 2019). This legal action also includes the right to fish in the South Arm of the Fraser River. The trial, which began in 2019, is ongoing (Ronson 2020).

For the purpose of treaty negotiations, Cowichan Tribes is a member of the Hul'qumi'num Treaty Group (Cowichan Tribes, 2020), which is currently in Stage 5 of the BC treaty process (BC Treaty Commission 2020). The Hul'qumi'num Treaty Group Statement of Intent consists of core territory, along with a marine territory (Cowichan Tribes 2020). Core traditional territory land of the Hul'qumi'num Treaty Group includes a part of southern Vancouver Island from Duncan north to Ladysmith, west to Lake Cowichan, and east to the Gulf Islands. The marine traditional territory of the Hul'qumi'num Treaty Group stretches across the Strait of Georgia to include a number of the Gulf Islands and a narrow corridor up the Fraser River to Yale on the mainland (BC Treaty Commission 2020).

Cowichan Tribes has signed a framework agreement under the *First Nations Lands Management Act* (First Nations Land Management Resource Centre 2021). For information on engagement with Cowichan Tribes, and on Indigenous Interests and concerns that were raised during early engagement, see Section 8.4.1.

### 8.3.2 Ditidaht First Nation

Ditidaht First Nation is an Indigenous nation on southern Vancouver Island in BC (BC Assembly of First Nations 2020). The traditional territory of the Ditidaht First Nation stretches inland from Cowichan Lake, down through Nitinaht Lake, and out to the coast between Bonilla Point and Pachena Point (Nitinaht 2016).

GCT is engaging with Ditidaht First Nation to determine areas where traditional activities are practiced relative to the Project location.

Ditidaht First Nation has a total of 17 reserves: [Ahuk 1](#) (53.4 ha), [Carmanah 6](#) (64.1), [Cheewat 4a](#) (3.8 ha), [Chuchummisapo 15](#) (35.1 ha), [Claoose 4](#) (100.6 ha), [Doobah 10](#) (5.3 ha), [Homitan 8](#) (202 ha), [Iktuksasuk 7](#) (68 ha), [Ilclo 12](#) (31.2 ha), [Malachan 11](#) (52.1 ha), [Opatseeah 13](#) (28.7 ha), [Oyees 9](#) (42.3 ha), [Saouk 16](#) (70.8 ha), [Sargue 5](#) (10.4 ha), [Tsuquanah 2](#) (95.1 ha), [Wokitsas 14](#) (16.2 ha) and Wyah 3 (53.4 ha) (Government of Canada 2020b). Malachan 11 is the main community and is located on the northwest shore of Nitinaht Lake (Indigenous and Northern Affairs Canada 2019). The administrative office is approximately 125 km from the Project.

Ditidaht First Nation is part of the Nuuchahnulth Tribal Council, a 14-member grouping of Indigenous nations that provides common services and supports for its Nations and their members (Nuuchahnulth Tribal Council, n.d.)

Ditidaht First Nation has been negotiating a treaty with BC at a common table with Pacheedaht First Nation since 1996 and is currently at Stage 5 of negotiations (Nitinaht 2020). Completed agreements include the Ditidaht and Pacheedaht Agreement-in-Principle – 2019, and the Ditidaht Incremental Treaty Agreement – 2013 (Government of BC 2020b). The Ditidaht First Nation signed a framework agreement in 2019 under the *First Nations Land Management Act* (First Nations Land Management Resource Centre 2021).

For information on engagement with Ditidaht First Nation, and on Indigenous Interests and concerns that were raised during early engagement, see Section 8.4.2.

### 8.3.3 Esquimalt Nation

The Esquimalt Nation is an Indigenous nation of southern Vancouver Island. Members of the Esquimalt Nation are part of the Lək̓ʷəŋən (Lekwungen) Peoples, belonging to the Coast Salish language group (Esquimalt Nation n.d.). The Esquimalt Nation's territory extends throughout greater Victoria and the San Juan Islands (Indigenous and Northern Affairs Canada 2019).

GCT is engaging with Esquimalt Nation to determine areas where traditional activities are practiced relative to the Project location.

Esquimalt Nation has one reserve, with a total reserve land area of 18.90 ha (Indigenous and Northern Affairs Canada 2019). Historically, the Esquimalt Nation's village was located closer to Victoria proper, but today their reserve is on the north shore of Esquimalt Harbour adjacent to the Town of View Royal (BC Assembly of First Nations 2020). The administrative office is approximately 68 km from the Project.

Esquimalt Nation ancestors signed a treaty in 1850 with the British (under James Douglas), which provided for continued access to fishing and hunting, and maintenance of the Esquimalt Nation’s spiritual relationship with the land, the resources, and ancestors (Esquimalt 2020). This agreement, one of the Douglas Treaties, documented signatory nations’ rights to fish and hunt as formerly and retain existing village lands and fields for their use (Isaac 2016). The Douglas Treaties are discussed in Section 8.3.34 below.

Esquimalt Nation is currently working with the Province on land and resource issues outside of the treaty process (BC Treaty Commission 2020). Esquimalt Nation signed a framework agreement in November 2020 under the *First Nations Land Management Act* (First Nations Land Management Resource Centre 2021).

For information on engagement with Esquimalt Nation, and on Indigenous Interests and concerns that were raised during early engagement, see Section 8.4.3.

### 8.3.4 First Nations of the Maa-nulth Treaty Society

The First Nations of the Maa-nulth Treaty Society, are five self-governing Nuu-chah-nulth nations from Vancouver Island: Huu-ay-aht First Nations, Ka:'yu:k't'h'/Che:k'tles7et'h' First Nations, Toquaht Nation, Uchucklesaht Tribe, and Yuuʔuʔiʔatʰ Government.

The First Nations of the Maa-nulth Treaty Society villages/territories are located on the west coast of Vancouver Island surrounding Barkley Sound and Kyuquot Sound (Maa-nulth First Nations 2021).

GCT is engaging with the First Nations of the Maa-nulth Treaty Society to determine areas where traditional activities are practiced relative to the Project location.

The Maa-nulth Treaty, signed in 2011, is among the first Treaties reached in BC under the provincial treaty process (Maa-nulth First Nations 2021). The Maa-nulth Treaty provided for 24,550 ha of fee simple land, which includes the following:

- Huu-ay-aht First Nations: 1,077 hectares of former reserves and 7,181 hectares of additional lands;
- Ka:'yu:k't'h'/Che:k'tles7et'h' First Nations: 379 hectares of former reserves and 5,920 hectares of additional lands;
- Toquaht Nation: 196 hectares of former reserves and 1,293 hectares of additional lands;
- Uchucklesaht Tribe: 233 hectares of former reserves and 2,834 hectares of additional lands; and
- Yuuʔuʔiʔatʰ Government: 199 hectares of former reserves, 5,147 hectares of additional lands, and a further 92 hectares of land acquired by Canada and BC. (Government of BC 2020b).

The distance from the Project to the administration office has been removed at the request of the First Nations of the Maa-nulth Treaty Society.

The governance of the First Nations of the Maa-nulth Treaty Society is based on the *Maa-nulth First Nations Final Agreement Act*. With the exception of determining Indian status, after a transition period, the *Indian Act* no longer applies to the First Nations of the Maa-nulth Treaty Society, their lands or members. Instead, constitutionally protected self-government provisions enable each of the First Nations of the Maa-nulth Treaty Society to make its

own decisions about matters related to the preservation of its culture, the exercise of its Treaty rights, and the operation of its government (Maa-nulth First Nations 2021).

For information on engagement First Nations of the Maa-nulth Treaty Society, and on Indigenous Interests and concerns that were raised during early engagement, see Section 8.4.4.

### 8.3.5 Halalt First Nation

The Halalt First Nation is an Indigenous nation who, along with Cowichan Tribes, Lyackson First Nation, Penelakut Tribe, and Stz'uminus First Nation, descends from the Cowichan Nation (Halalt 2021).

GCT is engaging with Halalt First Nation to determine areas where traditional activities are practiced relative to the Project location.

Halalt First Nation has two reserves (Halalt Island 1 and Halalt 2) (Indigenous and Northern Affairs Canada 2019). Halalt 2, the main community, is located on southeast Vancouver Island near the town of Chemainus, while Halalt Island 1 is located on Willy Island, east of Vancouver Island at the mouth of the Chemainus River. Halalt 1 was the site of a village, abandoned in the 1920s. Residents moved to Halalt 2 (Halalt 2020). The administrative office is approximately 46 km from the Project location.

As a Cowichan Nation community, Halalt First Nation is a member of the Cowichan Nation Alliance, which was formed to pursue legal action to reclaim the historic village of Tl'uqtinus and other nearby lands. Refer to Section 8.3.1 for additional details.

Halalt First Nation is part of the Hul'qumi'num Treaty Group, which is currently in Stage 5 of the BC treaty process (BC Treaty Commission 2020). The Hul'qumi'num Treaty Group Statement of Intent consists of core territory, as well as marine territory. The core traditional territory includes a portion of southern Vancouver Island that spans from Duncan, north of Ladysmith, west to Lake Cowichan, and east to the Gulf Islands. The marine traditional territory of the Hul'qumi'num Treaty Group stretches across the Strait of Georgia to include a number of the Gulf Islands and a narrow corridor up the Fraser River to Yale on the mainland (BC Treaty Commission 2020).

Halalt First Nation is also a member of the Naut'sa mawt Tribal Council, along with Malahat Nation, Stz'uminus First Nation, Tsawwassen First Nation, and Tseil-Waututh Nation (Naut'sa mawt Tribal Council 2020). The Naut'sa mawt Tribal Council, founded in 1983, provides shared services to 11 member nations, clustered around the themes of economic development; financial management; community planning; technical services; and governance (Naut'sa mawt Tribal Council 2020).

For information on engagement with Halalt First Nation and on Indigenous Interests and concerns that were raised during early engagement, see Section 8.4.5.

### 8.3.6 Katzie First Nation

Katzie First Nation is an Indigenous nation located in the Fraser Valley, with administrative offices in Pitt Meadows, BC (BC Assembly of First Nations n.d.). Katzie First Nation asserts rights within its traditional territory, which includes Pitt Meadows, Maple Ridge, Coquitlam, Surrey, Langley, and New Westminster (BC Treaty Commission 2020).

GCT is engaging with Katzie First Nation to determine areas where traditional activities are practiced relative to the Project location.

Katzie First Nation has five reserves located in Pitt Meadows, Langley, and Barnston Island: Barnston Island 3, Graveyard 5, Katzie 1, Katzie 2, and Pitt Lake 4 (Indigenous and Northern Affairs Canada 2019). Katzie 1 is the main community. The administrative office is approximately 40 km from the Project location.

Katzie First Nation is in Stage 4 of the BC treaty process, negotiating an Agreement in Principle with Canada and the province (BC Treaty Commission 2020). Katzie First Nation signed a First Nation Forest Agreement with the province of BC in 2005. It signed Forest and Range Consultation and Revenue Sharing Agreements with the province of BC effective 2014-2017, 2017-2020, and 2020-2022 (BC Treaty Commission 2020). Katzie First Nation recently signed a framework agreement under the *First Nations Land Management Act* (First Nations Land Management Resource Centre 2021).

For information on engagement with Katzie First Nation and on Indigenous Interests and concerns that were raised during early engagement, see Section 8.4.6.

### 8.3.7 Kwantlen First Nation

Kwantlen First Nation is an Indigenous nation located primarily on McMillan Island near Fort Langley, BC. Kwantlen First Nation traditional territory extends from Richmond and New Westminster in the west, to Surrey and Langley in the south, east to Mission, and to the northernmost reaches of Stave Lake (Kwantlen First Nation 2020).

GCT is engaging with Kwantlen First Nation to determine areas where traditional activities are practiced relative to the Project location.

In 2016 Kwantlen First Nation signed a three-year Kwantlen Forest Consultation and Revenue Sharing Agreement (BC Treaty Commission 2020). Kwantlen First Nation has signed a framework agreement under the *First Nations Land Management Act* (First Nations Land Management Resource Centre 2021).

For information on engagement with Kwantlen First Nation and on Indigenous Interests and concerns that were raised during early engagement, see Section 8.4.7.

### 8.3.8 Kwikwetlem First Nation

Kwikwetlem (kʷikʷəɬ əm) First Nation (“red fish up the river”) is an Indigenous nation situated along the Coquitlam River in Coquitlam, BC (Kwikwetlem First Nation 2021). Ethnographic and traditional use information indicates a close connection between the Kwikwetlem First Nation and the Coquitlam watershed, an area that includes Coquitlam Lake, the Coquitlam River above and below Coquitlam Lake, the lower Pitt River, and the adjacent north and south banks of the Fraser River (Kwikwetlem First Nation 2021).

GCT is engaging with Kwikwetlem First Nation to determine areas where traditional activities are practiced relative to the Project location.

Kwikwetlem First Nation has two reserves: Coquitlam Indian Reserve 1 and Coquitlam Indian Reserve 2, both in the District of New Westminster near the confluence of the Coquitlam and Fraser Rivers (Government of BC 2020b). Kwikwetlem First Nation’s on-reserve community members live on Coquitlam 1, the ancient village site of slakəya’nc.

Coquitlam 2, setłama'kmən, is located 2.5 km upstream (Kwkwetlem First Nation 2021). Coquitlam 1 is 2.6 ha and Coquitlam 2 is 81.9 ha (Government of BC 2020b). The administrative office is approximately 35 km from the Project location.

In 2015, Kwkwetlem First Nation signed a three-year Forest and Range Consultation and Revenue Sharing Agreement, which was extended in 2019 (BC Treaty Commission 2020). Kwkwetlem First Nation recently signed a framework agreement under the *First Nations Land Management Act* (First Nations Land Management Resource Centre 2021). They are currently working to ratify the Kwkwetlem First Nation Land Code (Kwkwetlem First Nation 2021).

For information on engagement with Kwkwetlem First Nation and on Indigenous Interests and concerns that were raised during early engagement, see Section 8.4.8.

### 8.3.9 Leq'á:mel First Nation

[Leq'á:mel](#) First Nation is an Indigenous nation located near Deroche across the Fraser River from Chilliwack, 22 km east of Mission, BC. [Leq'á:mel](#) First Nation is culturally Stó:lō, with a territory that is part of S'olh Téméxw, the traditional territory of the Stó:lō people (Sto:lo Service Agency, 2018). [Leq'á:mel](#) First Nation traditional territory includes a land area south to the Nooksack River (Washington State), east to the Harrison knob, northwest to the north shore of Stave Lake, southwest to the northern shores of Alouette Lake and down the west side of Silver Creek (Leq'á:mel First Nation 2019).

GCT is engaging with [Leq'á:mel](#) First Nation in an effort to determine areas where traditional activities are practiced relative to the Project location.

[Leq'á:mel](#) First Nation has 11 reserves: Aylechootlook 5, Holachten 8, Lackaway 2, Lakahahmen 11, Lakway Cemetery 3, Papekwatchin 4, Pekw'xe:yles, Skweahm 10, Sumas Cemetery, Yaalstrick 1, and Zaitscullachan 9 (Indigenous and Northern Affairs Canada 2019). Holachten 8 is the main community and is located in Deroche, which is 22 km east of Mission in the Fraser Valley. The administrative office is approximately 85 km from the Project location.

[Leq'á:mel](#) First Nation is a member of the Stó:lō Nation. They participate in the BC treaty process as part of the Stó:lō Xwexwilmexw Treaty Association, which is negotiating in the BC treaty process on behalf of 6 of 11 bands in the Stó:lō Nation. Stó:lō Xwexwilmexw Treaty Association is in Stage 5 of the Treaty process (Government of BC 2020b). From April 2014 to April 2019, [Leq'á:mel](#) First Nation was part of the Stó:lō Strategic Engagement Agreement, which is a consultation and accommodation agreement between Stó:lō Nation members and the Government of BC.

[Leq'á:mel](#) First Nation signed a Forest and Range Consultation and Revenue Sharing Agreement in 2017, and signed a forest agreement in 2005 (BC Treaty Commission 2020). [Leq'á:mel](#) First Nation has signed a framework agreement under the *First Nations Land Management Act* (First Nations Land Management Resource Centre 2021).

For information on engagement with [Leq'á:mel](#) First Nation and on Indigenous Interests and concerns that were raised during early engagement, see Section 8.4.9.

### 8.3.10 Lyackson First Nation

Lyackson First Nation is an Indigenous nation located near Chemainus, BC who, along with Cowichan Tribes, Halalt First Nation, Penelakut Tribe, and Stz'uminus First Nation, descend from the Cowichan Nation. Lyackson First Nation's core traditional territory includes a portion of southern Vancouver Island from north of Ladysmith, west to Lake Cowichan, east to the Gulf Islands, including the southern Gulf Islands, and the region of the South Arm and mouth of the Fraser River. The marine traditional territory spans across the Strait of Georgia to include a narrow corridor on the mainland (Lyackson First Nation n.d.).

The ancestral territory of Lyackson First Nation is Valdes Island, which lies between Gabriola Island to the north and Galiano Island to the south, directly opposite the mouth of the Fraser River in the Strait of Georgia. Lyackson First Nation continues to engage in traditional land use (TLU) practices on Valdes Island on a seasonal basis (Lyackson First Nation n.d.).

GCT is engaging with Lyackson First Nation to determine areas where traditional activities are practiced relative to the Project location.

Lyackson First Nation has three reserves, which comprise a third of Valdes Island: Lyackson 3 (710.60 ha, near the north end of Valdes Island), Portier Pass 5 (2 ha, situated at the south tip of Valdes Island), and Shingle Point 4 (32 ha located on the west shore of Valdes Island) (Indigenous and Northern Affairs Canada 2019). Shingle Point 4 is the main community. The administrative office is approximately 42 km from the Project location.

As a Cowichan Nation community, Lyackson First Nation is a member of the Cowichan Nation Alliance, which was formed to pursue legal action to reclaim the historic village of Tl'uqtinus and other nearby lands. Refer to Section 8.3.1 for additional details.

Lyackson First Nation is also part of the Hul'qumi'num Treaty Group, which is currently in Stage 5 of the BC treaty process (BC Treaty Commission 2020). The Hul'qumi'num Treaty Group Statement of Intent covers both core territory and marine territory. The core traditional territory includes a portion of southern Vancouver Island that extends from north of Ladysmith, west to Lake Cowichan and east to the Gulf Islands. The marine traditional territory stretches across the Strait of Georgia, and also includes a narrow corridor on the Fraser River (BC Treaty Commission 2020).

For information on engagement with Lyackson First Nation and on Indigenous Interests and concerns that were raised during early engagement, see Section 8.4.10.

### 8.3.11 Malahat Nation

Malahat Nation is a Coast Salish Indigenous community located on southeastern Vancouver Island, BC. Malahat Nation is a descendant of the W̱SÁNEĆ (Saanich) People, along with Pauquachin First Nation, Tsawout First Nation, Tsartlip First Nation, and Tseycum First Nation. These nations share a common history and territory. The traditional territory of the W̱SÁNEĆ People stretches from the Saanich Peninsula in the west, through the Gulf Islands and the San Juan Islands, and east to Boundary Bay (W̱SÁNEĆ n.d.).

GCT is engaging with Malahat Nation to determine areas where traditional activities are practiced relative to the Project location.

Malahat Nation has reserve lands located on the western shore of Saanich Inlet, south of the village of Mill Bay, about 40 km north of Victoria. Malahat Nation has two reserves: Goldstream 13 (shared reserve 8.9 ha) and Malahat 11 (239 ha) (Malahat Nation 2020). The total reserve land is 247.9 ha (Government of BC 2020b). The administrative office is approximately 53 km from the Project location.

The Malahat Nation is also a member of the Naut'sa mawt Tribal Council, along with Halalt Nation, Stz'uminus First Nation, Tsawwassen First Nation, and Tseil-Waututh Nation (Naut'sa mawt Tribal Council, 2020). The Naut'sa mawt Tribal Council, founded in 1983, provides shared services to 11 member nations, clustered around the themes of economic development; financial management; community planning; technical services; and governance (Naut'sa mawt Tribal Council, 2020).

Malahat Nation is a member of the Te'mexw Treaty Association, which is negotiating with Canada and BC in the treaty process on behalf of its five member-bands: Malahat Nation, Sc'ianew (Beecher Bay) First Nation, Songhees Nation, Snaw-aw-as (Nanosee) and T'Sou-ke Nations. They are in Stage 5 (Final Agreement Negotiations). Completed agreements include the Te'mexw Treaty Association Agreement-in-Principle – 2015 and Malahat Nation Incremental Treaty Agreement – 2013 (BC Treaty Commission 2020).

Malahat Nation recently signed a framework agreement in 2014 under the *First Nations Land Management Act* (First Nations Land Management Resource Centre 2021).

Malahat Nation ancestors signed a treaty in 1850 with the British (under James Douglas), which provided for continued access to fishing and hunting, and maintenance of the Malahat Nation's spiritual relationship with the land, the resources, and ancestors. This agreement, one of the Douglas Treaties, documented signatory nations' rights to fish and hunt as formerly and retain existing village lands and fields for their use (Isaac and Isaac 2016). The Douglas Treaties are discussed in Section 8.3.34 below.

For information on engagement with Malahat Nation and on Indigenous Interests and concerns that were raised during early engagement, see Section 8.4.11.

### 8.3.12 Matsqui First Nation

Matsqui First Nation is an Indigenous nation located in the Central Fraser Valley region of BC. Matsqui First Nation is culturally Stó:lō, with a territory that is part of S'olh Téméxw, the traditional territory of the Stó:lō people (Sto:lo Service Agency, 2018). The core traditional territory of Matsqui First Nation stretches along the Fraser River from Crescent Island to Sumas Mountain, and southward beyond the Canada-USA border (BC Assembly of First Nations 2020).

GCT is engaging with Matsqui First Nation to determine areas where traditional activities are practiced relative to the Project location.

Matsqui First Nation has five reserves: Matsqui 4 (24.3 ha), [Matsqui Main 2](#) (129.7 ha), [Pekw'xe:Yles \(Peckquaylis\)](#) (shared reserve 10.3 ha), [Sahhacum 1](#) (20.2 ha) and [Three Islands 3](#) (246.3 ha). The reserve land area totals 430.80 ha (Government of BC 2020b). The administrative office is approximately 60 km from the Project location.

Matsqui First Nation is one of 11 Stó:lō Nation bands negotiating land and resource issues outside the BC treaty process (BC Treaty Commission 2020).



In 2019, Matsqui First Nation filed a claim against the federal government for the sale of nearly their entire reservation land over 150 years ago by the Colony of BC. The claim states 99 percent of the 9,600 acres administered to the Matsqui by the colonial government in 1864 were sold out from under them to incoming settlers in the Fraser Valley. The claim is being made under Canada's Specific Claim Policy which states that Indigenous bands who historically suffered under colonial government treaty breaches are entitled to compensation from today's federal government (CBC 2019).

Stó:lō recently signed a framework agreement in 2019 under the First Nations Land Management Act (First Nations Land Management Resource Centre 2021).

For information on engagement with Matsqui First Nation and on Indigenous Interests and concerns that were raised during early engagement, see Section 8.4.12.

### 8.3.13 Métis Nation British Columbia

Métis Nation British Columbia represents about 90,000 self-identified Métis people throughout the province, including 18,000 provincially-registered Métis citizens (Métis Nation British Columbia 2021). It also represents 39 Métis chartered communities, including six in the Lower Mainland (Chilliwack Métis Association, Fraser Valley Métis Association, Golden Ears Métis Society, North Fraser Métis Association, Nova Métis Heritage Association, Waceyá Métis Society) and three in south Vancouver Island (Cowichan Valley Métis Association, Mid-Island Métis Nation Association, and the Métis Nation of Greater Victoria Association) (Métis Nation British Columbia 2021).

GCT is engaging with Métis Nation British Columbia to determine areas where traditional activities are practiced relative to the Project location.

The Federal and Provincial governments, as well as the Métis National Council, recognize the Métis Nation British Columbia as the governing nation for Métis in the province. Métis Nation British Columbia established its constitution in 2003 that implemented a self-governance and legislative structure, as well as a citizenship process (Métis Nation British Columbia 2021).

The Métis Nation British Columbia is not involved in treaty negotiations (Métis Nation British Columbia 2021). In 2006, the Métis Nation of British Columbia and the Province of BC signed the Métis Nation Relationship Accord to signify a positive working relationship for the self-identified Métis in BC (Métis Nation British Columbia 2021).

For information on engagement with Métis Nation British Columbia, and on Indigenous Interests and concerns that were raised during early engagement, see Section 8.4.13.

### 8.3.14 Musqueam Indian Band

Musqueam Indian Band is an Indigenous nation located in the Delta and Richmond areas of the Lower Mainland, BC. Musqueam Indian Band's ancestors have lived in the Fraser River Estuary for thousands of years. Today, portions of Musqueam Indian Band's traditional territory include Vancouver, North Vancouver, South Vancouver, Burrard Inlet, New Westminster, Burnaby, and Richmond (Musqueam 2020). The Musqueam Declaration of 1976 asserts Indigenous rights to the lands from Howe Sound eastward to the height of land, including the watershed draining into English Bay, Burrard Inlet, and Indian Arm; south including the Coquitlam River to the Fraser River; across to the

south bank of the Fraser River and proceeding downstream in the South Arm to the sea (Musqueam First Nation 1976).

GCT is engaging closely with Musqueam Indian Band to understand Musqueam Indian Band's Indigenous Interests and the Project's potential effects on them. These discussions are further described in Section 8.4.14 below.

Musqueam Indian Band has three reserves located along the west coast of the Lower Mainland: Musqueam 2, Musqueam 4, and Sea Island 3 (Indigenous and Northern Affairs Canada 2019). The main community, Musqueam 2, is located at the mouth of the North Arm of the Fraser River, within the City of Vancouver. Musqueam 4 is located near Canoe Pass on the South Arm of the Fraser River. Sea Island 3 is located in Delta, BC. The administrative office is approximately 23 km from the Project location.

Musqueam Indian Band is currently negotiating an Agreement in Principle with Canada and the Province and is in Stage 4 of the BC treaty process (BC Treaty Commission 2020). Musqueam Indian Band has signed a collaborative management agreement with the Province that sets out a framework for land and water authorization and stewardship in the estuary and lower sections of the Fraser River (BC Treaty Commission 2020).

Musqueam Indian Band has signed a framework agreement under the *First Nations Land Management Act* (First Nations Land Management Resource Centre 2021).

For information on engagement with Musqueam Indian Band, and on Indigenous Interests and concerns that were raised during early engagement, see Section 8.4.14.

### 8.3.15 Pacheedaht First Nation

The Pacheedaht First Nation is an Indigenous nation located on the southwest coast of Vancouver Island, BC (Pacheedaht First Nation, 2013). Pacheedaht First Nation territory includes the lands and waters along the southwest coast of Vancouver Island between Bonilla Point and Sheringham Point (Pacheedaht First Nation 2013).

GCT is engaging with Pacheedaht First Nation to determine areas where traditional activities are practiced relative to the Project location.

Pacheedaht First Nation has four reserve lands totalling 179.6 ha: Pacheena 1 (61.9 ha), Gordon River 2 (69.2h), Cullite 3 (38.4 ha), and Queesidaquah 4 (10.1 ha) (BC Assembly of First Nations 2020) (Government of BC 2020b). The administrative office is approximately 105 km from the Project location.

Pacheedaht First Nation has been negotiating a treaty with BC at a common table with Ditidaht First Nation since 1996 and is currently at Stage 5 of negotiations (BC Treaty Commission 2020). Completed agreements are the Ditidaht and Pacheedaht Agreement-in-Principle (2019) and Pacheedaht Incremental Treaty Agreement (2013) (BC Treaty Commission 2020).

For information on engagement with Pacheedaht First Nation, and on Indigenous Interests and concerns that were raised during early engagement, see Section 8.4.15.

### 8.3.16 Pauquachin First Nation

Pauquachin First Nation is an Indigenous Nation whose traditional territories include the Greater Victoria area of Vancouver Island, BC. Pauquachin First Nation is a descendant of the the W̱SÁNEĆ (Saanich) People, along with Malahat Nation, Tsawout First Nation, Tsartlip First Nation, and Tseycum First Nation. These nations share a common history and territory. The traditional territory of the W̱SÁNEĆ People stretches from the Saanich Peninsula in the west, through the Gulf Islands and the San Juan Islands, and east to Boundary Bay (W̱SÁNEĆ, n.d.).

GCT is engaging with Pauquachin First Nation to determine areas where traditional activities are practiced relative to the Project location.

The Pauquachin First Nation has three reserves totaling 330.40 ha: Coles Bay 3 (284.7 ha), Goldstream 13 (8.9 ha, shared reserve), and Hatch Point 12 (36.8 ha) (Government of BC, 2020b). All on-reserve Pauquachin members reside in Coles Bay 3, which is largely residential with some cultural and administrative amenities. Pauquachin holds a shared claim to Goldstream 13 along with the Malahat, Tsartlip, Tsawout, and Tseycum First Nations for traditional fishing purposes. These reserves were established as part of the 14 Douglas Treaties, a colonial policy that recognized Aboriginal possession of land (Pauquachin First Nation, n.d.), as well as signatory nations' rights to fish and hunt as formerly, and retain existing village lands and fields for their use (Isaac 2016). The Douglas Treaties are discussed in Section 8.3.34. The administrative office is approximately 50 km from the Project location.

For information on engagement with Pauquachin First Nation, and on Indigenous Interests and concerns that were raised during early engagement, see Section 8.4.16.

### 8.3.17 Penelakut Tribe

Penelakut Tribe is an Indigenous nation who, along with Cowichan Tribes, Halalt First Nation, Lyackson First Nation, and Stz'uminus First Nation, descends from the Cowichan Nation. Penelakut Tribe's main community is located on Penelakut Island, off the coast of Vancouver Island near Chemainus, BC (Penelakut Tribe n.d.). The traditional core territory of the Penelakut Tribe includes land on southern Vancouver Island, stretching from Ladysmith in the north, west to Lake Cowichan, and east to the Gulf Islands. Its marine territory stretches across the Strait of Georgia, as well as up the Fraser River to Yale, BC (Penelakut Tribe n.d.).

GCT is engaging with Penelakut Tribe to determine areas where traditional activities are practiced relative to the Project location.

Penelakut Tribe has four reserves along the southeastern coast of Vancouver Island, which comprise 635.70 ha of land. These include Galiano Island 9, Penelakut Island 7, Tent Island 8, and Tsussie 6 near Chemainus (Government of BC, 2020b). The reserves are located directly opposite the mouth of the Fraser River in the Strait of Georgia (Indigenous and Northern Affairs Canada 2019). Penelakut Island 7 is the main community. The administrative office is approximately 37 km from the Project location.

The Cowichan Nation communities of Cowichan Tribes, Halalt First Nation, Lyackson First Nation, Penelakut Tribe, and Stz'uminus First Nation formed the Cowichan Nation Alliance to pursue legal action to reclaim the historic Cowichan Nation village site of Tl'uqtinus and other nearby lands in areas that are now called Richmond and Delta (Woodward & Company 2019). This legal action also includes the right to fish in the South Arm of the Fraser River (Woodward & Company 2019). The trial began in 2019 and is ongoing (Ronson 2020).

Penelakut Tribe is part of the Hul'qumi'num Treaty Group, which is currently in Stage 5 of the BC treaty process (BC Treaty Commission 2020).

Penelakut Tribe signed a framework agreement in 2020 under the *First Nations Land Management Act* (First Nations Land Management Resource Centre 2021).

For information on engagement with Penelakut Tribe, and on Indigenous Interests and concerns that were raised during early engagement, see Section 8.4.17.

### 8.3.18 Popkum First Nation

Popkum First Nation is an Indigenous nation whose main community is located near Bridal Falls, close to the Fraser River, northeast of Chilliwack, BC. (BC Assembly of First Nations 2021). Popkum First Nation is culturally Stó:lō, with a territory that is part of S'ólh Téméxw, the traditional territory of the Stó:lō people (Sto:lo Service Agency, 2018). The traditional territory of Popkum First Nation, a Hul'qumi'num-speaking people, is located west of Chilliwack, south to the Chilliwack River, up to the northwest end of Harrison Lake and east to Spuzzum and the Coquihalla Summit (Indigenous and Northern Affairs (INAC), 2019).

GCT is engaging with Popkum First Nation to determine areas where traditional activities are practiced relative to the Project location.

Popkum First Nation has three reserves: Popkum 1 (141.1 ha), Pekw'xe:yales (10.3 ha - shared reserve), and Popkum 2 (8.6 ha) (Government of BC 2020b). The administrative office is approximately 87 km from the Project location.

Popkum First Nation signed a Framework Agreement in November 2020 under the *First Nations Land Management Act* (First Nations Land Management Resource Centre 2021). Popkum First Nation signed a Forest Consultation and Revenue Sharing Agreement with the Province of BC in 2016 (BC Treaty Commission 2020).

For information on engagement with Popkum First Nation, and on Indigenous Interests and concerns that were raised during early engagement, see Section 8.4.18.

### 8.3.19 Sc'ianew (Beecher Bay) First Nation

Sc'ianew First Nation, also known as Beecher Bay, is an Indigenous nation located on southern Vancouver Island. Sc'ianew First Nation's main community is located near Beecher Bay in East Sooke, 30 km southwest of Victoria (Scia'new First Nation (Beecher Bay) 2020). Sc'ianew First Nation's asserted traditional territory includes an area from west of the Saanich Inlet to the southern tip of Vancouver Island (BC Assembly of First Nations 2020).

GCT is engaging with Sc'ianew First Nation to determine areas where traditional activities are practiced relative to the Project location.

Sc'ianew First Nation has eight reserves: [Becher Bay 1](#) (202.7 ha), [Becher Bay 2](#) (95.1 ha), [Fraser Island 6](#) (5.7 ha), [Lamb Island 5](#) (0.2 ha), [Long Neck Island 9](#) (1.6 ha), [Twin Island 10](#) (0.4 ha), [Village Island 7](#) (1.2 ha) and [Whale Island 8](#) (0.8 ha) for a total of 307 ha (Government of BC 2020b). The main community is Beecher Bay 1, located in East Sooke (Indigenous and Northern Affairs Canada 2019). The administrative office is approximately 84 km from the Project location.

Sc'ianew First Nation was a signatory to one of the Douglas Treaties, late-19th-century treaties that documented signatory nations' rights to fish and hunt as formerly and retain existing village lands and fields for their use. The Douglas Treaties are discussed in Section 8.3.34 below.

Sc'ianew First Nation participates in the BC treaty process as part of the Te'mexw Treaty Association, along with Malahat Nation, Snaw-Naw-As (Nanoose) Nation, Songhees Nation, and T'Sou-ke Nation. They are currently in Stage 5 of the BC treaty process (BC Treaty Commission 2020). Completed agreements include the Te'mexw Treaty Association Agreement-in-Principle – 2015 and Sc'ianew First Nation Incremental Treaty Agreement – 201 (BC Treaty Commission 2020).

Sc'ianew First Nation has signed a framework agreement under the *First Nations Land Management Act*. Sc'ianew First Nation has been operating under the *First Nations Land Management Act* since the ratification and has been operating under their Land Code since August 1, 2003 (Scia'new First Nation (Beecher Bay) 2020).

For information on engagement with Sc'ianew First Nation, and on Indigenous Interests and concerns that were raised during early engagement, see Section 8.4.19.

### 8.3.20 Seabird Island Band

Seabird Island Band is an Indigenous nation of Stó:lō people whose main community is on Sea Bird Island in the Upper Fraser Valley region. Their territory lies within S'olh Téméxw, the traditional territory of the Stó:lō people, near Agassiz, BC and extends from Langley east to Yale (Seabird Island Band n.d.; Sto:lo Resource and Research Management 2016).

GCT is engaging with Seabird Island Band to determine areas where traditional activities are practiced relative to the Project location.

Seabird Island Band has two reserves: Peckw'xe:yles and Seabird Island (Indigenous and Northern Affairs Canada 2019). The main community is Seabird Island, which is located on the Fraser River and 3 km east of Agassiz in the District of Kent. The administrative office is approximately 107 km from the Project location.

Seabird Island Band is negotiating land and resource agreements outside of the BC treaty process (BC Treaty Commission 2020). Seabird Island Band's Aboriginal Rights and Title Department supports the cultural significance of its traditional territory through preserving and protecting areas of interest (Seabird Island Band n.d.).

Seabird Island Band signed a framework agreement in 2020 under the *First Nations Lands Management Act* (First Nations Land Management Resource Centre 2021).

For information on engagement with Seabird Island Band, and on Indigenous Interests and concerns that were raised during early engagement, see Section 8.4.20.

### 8.3.21 Semiahmoo First Nation

Semiahmoo First Nation is an Indigenous nation located near Boundary Bay, BC. Semiahmoo First Nation's traditional territory extends around Boundary Bay and includes sections of Point Roberts, the Serpentine and Nicomekl Rivers, and Lake Terrell (Brown 2014).

GCT is engaging with Semiahmoo First Nation to determine areas where traditional activities are practiced relative to the Project location.

Semiahmoo First Nation is primarily located today on the 12-acre Semiahmoo Indian Reserve between White Rock, BC and the Canada–USA boundary (Government of BC 2020b). Semiahmoo First Nation has one reserve that faces Semiahmoo Bay at the Canada-USA border. The administrative office is approximately 28 km from the Project location.

For information on engagement with Semiahmoo First Nation, and on Indigenous Interests and concerns that were raised during early engagement, see Section 8.4.21.

### 8.3.22 Shxw’ōwhámél First Nation

The Shxw’ōwhámél First Nation is an Indigenous nation located in the Upper Fraser Valley region near Hope, BC. Shxw’ōwhámél people are culturally Stó:lō, with a territory that is part of S’ólh Téméxw, the traditional territory of the Stó:lō people (Sto:lo Service Agency 2018). Areas in Shxw’ōwhámél territory of importance to the Shxw’ōwhámél First Nation includes the watersheds of Jones, Lorenzetti, and Hunter Creeks (Shxw’ōwhámél First Nation n.d.).

GCT is engaging with Shxw'ow'hamel First Nation to determine areas where traditional activities are practiced relative to the Project location.

Shxw’ōwhámél First Nation has four reserves: Kuthlath 3, Ohamil 1, Peckw’xe:yles, and Wahleach Island 2 (Indigenous and Northern Affairs Canada 2019). Ohamil 1, the main community, is 13 kilometres west of Hope BC along the Trans-Canada Highway on the left bank of the Fraser River, 7 km north of Laidlaw. Shxw’ōwhámél First Nation has three other reserves: Wahleach 2, along the Lougheed Highway; Xelhálh (kuth-lath) 3, north of Yale, BC along Highway 1; and Pekw’xe:yles, a shared reserve located on the north bank of the Fraser River within the District of Mission (Shxw’ōwhámél First Nation n.d.). The total reserve land is 372.1 ha (Government of BC 2020b). The administrative office is approximately 120 km from the Project location.

Shxw’ōwhámél First Nation is currently negotiating land and resource agreements with the Province of BC outside of the BC treaty process (BC Treaty Commission 2020). Shxw’ōwhámél First Nation was a signatory member of the Strategic Engagement Agreement (SEA) between Stó:lō First Nations and the Province of BC (Stó:lō SEA) from April 1, 2014, to March 31, 2019. As of April 1, 2019, they are no longer members. The Stó:lō SEA is managed by S’ólh Téméxw Stewardship Alliance /People of the River Referral Office.

Shxw’ōwhámél First Nation recently signed a framework agreement in 2020 under the *First Nations Land Management Act* (First Nations Land Management Resource Centre 2021).

For information on engagement with Shxw’ōwhámél First Nation, and on Indigenous Interests and concerns that were raised during early engagement, see Section 8.4.22.

### 8.3.23 S’ólh Téméxw Stewardship Alliance/People of the River Referral Office

The S’ólh Téméxw Stewardship Alliance is a group of 15 Stó:lō Nations in the Fraser Valley: Aitchelitz, Chawathil, Cheam, Kwaw Apilt, Shxwà:y Village, Skawahlook, Skowkale, Skwah, Soowahlie, Sq’éwlets, Squiala, Sumas, Tzeachten, Yakweawioose, and Yale. The traditional territory of the Stó:lō Nations is known as S’ólh Téméxw, and extends east towards Manning Park and north to the Coquihalla Summit, west through Spuzzum, the north end of

Harrison Lake and above Pitt River Hot Springs. Heading southeast of the Sea to Sky Highway and entering the Salish Sea east of Horseshoe Bay. The southern border follows the Canada-USA border south of Manning Park to Boundary Bay and follows the shoreline out to the Salish Sea (Sto:lo Resource and Research Management 2016).

GCT is engaging with S'ólh Téméxw Stewardship Alliance to determine areas where traditional activities are practiced relative to the Project location. GCT initiated engagement with Sq'éwlets before the S'ólh Téméxw Stewardship Alliance submitted its notice to engage as a PIN. GCT is therefore continuing to engage with Sq'éwlets individually as well as through the S'ólh Téméxw Stewardship Alliance.

The People of the River Referral Office was formed on June 12, 2012. People of the River Referral is an office of technical staff from Stó:lō Nation (Stó:lō Research and Resource Management Centre) and the Ts'elxweyeqw Tribe (Sto:lo Resource and Research Management, 2016). The People of the River Referral Office is an operational arm of the S'ólh Téméxw Stewardship Alliance which provides administrative, research, and technical support throughout the referrals review process to several Stó:lō communities within S'ólh Téméxw (Sto:lo Resource and Research Management, 2016). The administrative office of the People of the River Referral Office (the administration office) is approximately 87 km from the Project location. The People of the River Referral Office is authorized to receive and respond to referrals on behalf of the Stó:lō First Nations in accordance with the Strategic Engagement Agreement (Sto:lo First Nation and Government of BC, 2019). The Province of BC and the Stó:lō Nations signed this agreement in 2019 in an effort to increase consultation effectiveness and efficiency, and to lead to greater certainty for land and resource decisions. The Strategic Engagement Agreement sets out the process for review and advising the province on adverse effects that a project may have on Stó:lō Nations and sets out timeframes for each party to respond (Sto:lo First Nation and Government of BC 2019).

For information on engagement with S'ólh Téméxw Stewardship Alliance, and on Indigenous Interests and concerns that were raised during early engagement, see Section 8.4.23.

### 8.3.24 Songhees Nation

The Songhees, or Songish, are a Ləkʷəŋən (Lekwungen) People who are located on southeastern Vancouver Island, BC in the Greater Victoria area. Historically, the Songhees Nation occupied the area from Albert Head to Cordova Bay to the San Juan Islands in Washington state (Songhees Nation 2020). [Songhees Nation](#) is a member of the [Te'mexw Treaty Association](#) and the [Naut'sa Mawt Tribal Council](#). The Songhees Nation is now located in the Township of Esquimalt on Vancouver Island, five kilometres from Victoria. Their traditional language is Ləkʷəŋən (Lekwungen), a dialect of the [North Straits Salish language](#) (Songhees Nation, 2020).

GCT is engaging with Songhees Nation to determine areas where traditional activities are practiced relative to the Project location.

The main Songhees Nation community is on the New Songhees 1A Reserve (66.1 ha). This is one of four reserves: the others are [\(Deadman's\) Halkett Island 2](#) (0.2 ha), [Chatham Islands 4](#) (35.4 ha), and [Discovery Island 3](#) (36.4 ha), for a total of 138.1 hectares (Government of BC 2020b). The administrative office is approximately 65 km from the Project location.

Songhees Nation was a signatory to one of the Douglas Treaties, late-19th-century treaties that documented signatory nations' rights to fish and hunt as formerly and retain existing village lands and fields for their use (Isaac 2016). The Douglas Treaties are discussed in Section 8.3.34 below.

Songhees Nation is involved in negotiations through the Te'mexw Treaty Association, which is negotiating with Canada and BC in the BC treaty process on behalf of its five member-bands: Malahat Nation, Sc'ianew (Beecher Bay) First Nation, Snaw-aw-as (Nanoose) First Nation, and T'Sou-ke First Nation. They are in Stage 5 (Final Agreement Negotiations) (BC Treaty Commission 2020). Completed agreements include the Te'mexw Treaty Association Agreement-in-Principle – 2015 (Songhees Nation 2020).

Songhees Nation has signed a framework agreement under the *First Nations Land Management Act* (First Nations Land Management Resource Centre 2021) and the Songhees Land Code was passed in 2010 (Songhees Nation 2020).

For information on engagement with Songhees Nation, and on Indigenous Interests and concerns that were raised during early engagement, see Section 8.4.24.

### 8.3.25 Squamish Nation (Skwxwú7mesh stelmexw)

The Squamish Nation (Skwxwú7mesh stelmexw) is an Indigenous nation comprised of descendants of the Coast Salish peoples. Squamish Nation's traditional territory encompasses approximately 692,100 ha from Point Grey in the south; to Roberts Creek in the west; north to the Elaho River headwaters, including the islands of Howe Sound and the Squamish Valley; southeast to the confluence of the Soo and Green Rivers; south to Port Moody, and west to Point Grey (Squamish Nation, 2020). This territory includes some of the present-day cities of Vancouver, Burnaby, and New Westminster, all of the cities of North Vancouver, West Vancouver, Port Moody and all of the District of Squamish and the Municipality of Whistler (Squamish Nation 2020).

GCT is engaging with Squamish Nation to determine areas where traditional activities are practiced relative to the Project location.

Squamish Nation has 24 reserves dispersed between the Squamish-Lillooet Regional District and Metro Vancouver Regional District. The reserves are located in an area stretching from southwest of Whistler to Vancouver, including Gibson's Landing and north of Howe Sound (Indigenous and Northern Affairs Canada 2019). The largest proportion of Squamish Nation members reside on several urban reserves in the City of Vancouver, North and West Vancouver, and the District of Squamish (Squamish Nation 2020). The administrative office is approximately 34 km from the Project location.

Squamish Nation is seeking a resolution for its long outstanding claim to its traditional territories. Squamish Nation is currently in Stage 3 of the BC treaty process, negotiation of a framework agreement (Squamish Nation 2020) (BC Treaty Commission 2020). In 1993, they submitted a Statement of Intent to begin negotiating Aboriginal rights, which are Indigenous rights protected under s. 35 of the *Constitution Act, 1982*, and title to the lands, waters, and resources within their traditional territory (Squamish Nation 2020).

For information on engagement with Squamish Nation, and on Indigenous Interests and concerns that were raised during early engagement, see Section 8.4.25.

### 8.3.26 Stz'uminus First Nation

Stz'uminus First Nation is an Indigenous nation who, along with Cowichan Tribes, Halalt First Nation, Lyackson First Nation, and Penelakut Tribe, descends from the Cowichan Nation. Stz'uminus First Nation's main community is located near Ladysmith, BC (Stz'uminus First Nation, 2020). Stz'uminus First Nation's traditional territory



encompasses the waters of the Salish Sea into Puget Sound, the Strait of Georgia including the lower portion of Quadra Island, and the Fraser River up to Yale, and includes a portion of southeastern Vancouver Island inland to Cowichan Lake, as well as the area that is now Richmond, Burnaby, and Delta (Stz'uminus First Nation 2020).

GCT is engaging with Stz'uminus First Nation to determine areas where traditional activities are practiced relative to the Project location.

The four reserves of the Stz'uminus First Nation on Vancouver Island comprise more than 1,200 ha of land, much of it bordering the Strait of Georgia and Ladysmith Harbour (Stz'uminus First Nation 2020). The reserves include Chemainus 13 (1,082.30 ha), Oyster Bay 12 (106.90 ha), near Ladysmith Harbour; Squaw-Hay-One 11 (31 ha), located southeast of the community of Chemainus; and Say-La-Quas 10 (6 ha), located on the Chemainus River (Indigenous and Northern Affairs Canada 2019). Chemainus 13 is the main community and is located on southeast Vancouver Island directly opposite the mouth of the Fraser River in the Stuart Channel. The administrative office is approximately 45 km from the Project location.

The Cowichan Nation communities of Cowichan Tribes, Halalt First Nation, Lyackson First Nation, Penelakut Tribe, and Stz'uminus First Nation formed the Cowichan Nation Alliance to pursue legal action to reclaim the historic Cowichan Nation village site of Tl'uqtinus and other nearby lands in areas that are now called Richmond and Delta (Woodward & Company 2019). The trial began in 2019 and is ongoing (Ronson 2020).

Stz'uminus First Nation has engaged in the Treaty Process both as a member of the Cowichan Nation Alliance and with the Hul'qumi'num Treaty Group. The Hul'qumi'num Treaty Group is at Stage 5 of the BC treaty process (Government of BC 2020b).

Stz'uminus First Nation sits on the Naut'sa mawt Tribal Council, along with Halalt First Nation, Tsawwassen First Nation, and Tseil-Waututh Nation (Naut'sa mawt Tribal Council 2020). The Naut'sa mawt Tribal Council, founded in 1983, provides shared services to 11 member nations, clustered around the themes of economic development; financial management; community planning; technical services; and governance (Naut'sa mawt Tribal Council, 2020). Stz'uminus First Nation was previously a part of the Hul'qumi'num Treaty Group but departed in 2014.

Stz'uminus First Nation has signed a framework agreement under the *First Nations Land Management Act* (First Nations Land Management Resource Centre 2021).

For information on engagement with Stz'uminus First Nation, and on Indigenous Interests and concerns that were raised during early engagement, see Section 8.4.27.

### 8.3.27 Tsartlip First Nation

Tsartlip First Nation is located on the Saanich Peninsula, Vancouver Island, BC. Tsartlip First Nation are descendants of the W̱SÁNEĆ (Saanich) People, along with Malahat Nation, Pauquachin First Nation, Tsawout First Nation, and Tseycum First Nation. These nations share a common history and territory. The traditional territory of the W̱SÁNEĆ People stretches from the Saanich Peninsula in the west, through the Gulf Islands and the San Juan Islands, and east to Boundary Bay (W̱SÁNEĆ n.d.).

GCT is engaging with Tsartlip First Nation in an effort to determine areas where traditional activities are practiced relative to the Project location.

Their main community is South Saanich Indian Reserve 1, located near the town of Brentwood Bay. The Tsartlip First Nation has four reserves, Goldstream 13 (8.9 ha – shared reserve), Mayne Island 6 (130.7 ha), Senanus Island 10 (1.6 ha), and South Saanich 1 (192.6 ha) for a total of 333.8 ha (Indigenous and Northern Affairs Canada 2019). The administrative office is approximately 55 km from the Project location.

Tsartlip First Nation is an original signatory of the Douglas Treaties in 1852, which provides protection for their village sites, as well as hunting and fishing rights (CRD 2021). The Douglas Treaties are discussed in Section 8.3.34 below.

Tsartlip First Nation is not currently pursuing a modern-day treaty through the BC process but is negotiating land and resource issues with the province through separate means (BC Treaty Commission 2020). The Province of BC and Tsartlip First Nation signed an Interim Reconciliation Agreement on March 23, 2017. Tsartlip First Nation is noted as “short-term inactive” regarding a framework agreement under the *First Nations Land Management Act* (First Nations Land Management Resource Centre 2021).

Tsartlip First Nation is also part of the W̱SÁNEĆ Leadership Council Society, which also includes the Tsawout First Nation and Tseycum First Nation (W̱SÁNEĆ n.d.)

For information on engagement with Tsartlip First Nation, and on Indigenous Interests and concerns that were raised during early engagement, see Section 8.4.28.

### 8.3.28 Tsawout First Nation

Tsawout First Nation is an Indigenous nation located on the Saanich Peninsula in southern Vancouver Island, BC. Tsawout First Nation is a descendant of the W̱SÁNEĆ (Saanich) People, along with Malahat Nation, Pauquachin First Nation, Tsartlip First Nation, and Tseycum First Nation. These nations share a common history and territory. The traditional territory of the W̱SÁNEĆ People stretches from the Saanich Peninsula in the west, through the Gulf Islands and the San Juan Islands, and east to Boundary Bay (W̱SÁNEĆ n.d.).

GCT is engaging with Tsawout First Nation to determine areas where traditional activities are practiced relative to the Project location.

Tsawout First Nation has six reserves encompassing a total of 423.4 ha (Indigenous and Northern Affairs Canada 2019). These include Bare Island 9 (10.5), East Saanich 2 (237.7 ha), Fulford Harbour 5 (17.4 ha), Goldstream 13 (8.9 ha), Pender Island 8 (3.2 ha), and Saturna Island 7 (145.7 ha) (Indigenous and Northern Affairs Canada 2019). The main community is East Saanich 2, on the west side of the Saanich Peninsula. The Tsawout First Nation has three reserves that it shares with Tseycum First Nation: Bare Island 9, Pender Island 8, and Saturna Island 7. The administrative office is approximately 51 km from the Project location.

Tsawout First Nation was a signatory to one of the Douglas Treaties, late-19th-century treaties that documented signatory nations’ rights to fish and hunt as formerly and retain existing village lands and fields for their use (Isaac 2016). The Douglas Treaties are discussed in Section 8.3.34 below.

Tsawout First Nation is also part of the W̱SÁNEĆ Leadership Council Society, which also includes the Tsartlip First Nation and Tseycum First Nation (W̱SÁNEĆ n.d.)

Tsawout First Nation has signed a framework agreement under the *First Nations Land Management Act* (Tsawout First Nation n.d.).

For information on engagement with Tsawout First Nation, and on Indigenous Interests and concerns that were raised during early engagement, see Section 8.4.29.

### 8.3.29 Tsawwassen First Nation

Tsawwassen First Nation is an Indigenous nation located in Tsawwassen, BC. They have direct control and ownership over approximately 724 ha of land, exercise rights to 10,000 km<sup>2</sup> of traditional territory, and inhabit the lands nearest to the Project but have used traditional lands over a much wider area (Minister of Public Works and Government Services Canada, 2010). According to the Tsawwassen First Nation website:

“Our land base is deeply connected to our identity. Our traditional territory is bordered on the northeast by the watersheds that feed into Pitt Lake, down the Pitt River to the city of Pitt Meadows, where they empty into the Fraser River. It includes Burns Bog and part of New Westminster, following the outflow of the Fraser River just south of Sea Island. From Sea Island, it cuts west across the Salish Sea to Galiano Island and includes all of Saltspring, Pender and Saturna Islands. From there, our territory continues northeast to include the Point Roberts Peninsula and the watersheds of the Serpentine and Nicomeckl rivers (Tsawwassen First Nation, 2020).”

GCT and the Tsawwassen First Nation have had a Memorandum of Understanding (MOU) since 2010 that outlines the commitment to meaningful engagement and collaboration. GCT’s engagement with Tsawwassen First Nation was formulative of the Project’s early design and location. GCT is committed to ongoing engagement to determine areas where traditional activities are practiced relative to the Project location.

Tsawwassen First Nation is the Indigenous nation closest to the Project. The Project is located adjacent to the lands and water lots owned by the Tsawwassen First Nation as part of the Tsawwassen First Nation Final Agreement (Tsawwassen First Nation 2020). The Project also falls within, or adjacent to, water bodies considered for traditional and economic use by the Tsawwassen First Nation in the Tsawwassen First Nation Harvest Agreement, which forms part of the Final Agreement. The Tsawwassen First Nation Final Agreement, signed in 2007, is a comprehensive tripartite agreement between Canada, BC, and Tsawwassen First Nation, which transfers land and self-government jurisdiction to Tsawwassen First Nation. The Final Agreement took effect in 2009 (Tsawwassen First Nation 2020; BC Treaty Commission 2020). The administrative office is less than 5 km from the Project location.

Tsawwassen First Nation sits on the Naut'sa mawt Tribal Council, along with Halalt First Nation, Stz'uminus First Nation, and Tsleil-Waututh Nation (Naut'sa mawt Tribal Council 2020). The Naut'sa mawt Tribal Council, founded in 1983, provides shared services to 11 member nations, clustered around the themes of economic development; financial management; community planning; technical services; and governance (Naut'sa mawt Tribal Council 2020).

For information on engagement with Tsawwassen First Nation, and on Indigenous Interests and concerns that were raised during early engagement, see Section 8.4.30.

### 8.3.30 Tseycum First Nation

Tseycum First Nation (W̱SÍKEM) is an Indigenous nation located on southern Vancouver Island near Victoria, BC (Tseycum First Nation n.d.). Tseycum First Nation is descended from the W̱SÁNEĆ (Saanich) People, along with Malahat Nation, Tsawout First Nation, and Tsartlip First Nation. These nations share a common history and territory. The traditional territory of the W̱SÁNEĆ People stretches from the Saanich Peninsula in the west, through the Gulf Islands and the San Juan Islands, and east to Boundary Bay (W̱SÁNEĆ n.d.).

GCT is engaging with Tseycum First Nation in an effort to determine areas where traditional activities are practiced relative to the Project location.

Tseycum First Nation has five reserves: Bare Island 9, Goldstream 13, Pender Island 8, Saturna Island 8, and Union Bay 4 (Indigenous and Northern Affairs Canada 2019). Union Bay Indian Reserve No.4 (28 ha) is one of the four Saanich villages of southern Vancouver Island, located at the center of Patricia Bay on the Saanich Peninsula (BC Assembly of First Nations 2020). The Tseycum First Nation has three other reserves that it shares with Tsawout First Nation. These include Bare Island 9 (10.5 ha), Pender Island 8 (3.2 ha), and Saturna Island 7 (145.7 ha). Tseycum First Nation shares Goldstream 13 (8.9 ha) with four other First Nations: Malahat Nation, Pauquachin, Tsartlip and Tsawout First Nations. The total reserve land held by Tseycum First Nation is 196.3 ha (Indigenous and Northern Affairs Canada 2019). The administrative office is approximately 45 km from the Project location.

Tseycum First Nation is negotiating with BC on land and resource issues outside of the BC treaty process (BC Treaty Commission 2020).

Tseycum First Nation recently signed a framework agreement in 2019 under the *First Nations Land Management Act* (First Nations Land Management Resource Centre 2021). Tseycum First Nation is an original signatory of the Douglas Treaties in 1852, which provides protection for their village sites, as well as hunting and fishing rights (Isaac 2016). The Douglas Treaties are discussed in Section 8.3.34.

They are also part of the W̱SÁNEĆ Leadership Council Society, which also includes the Tsartlip and Tsawout Nations.

For information on engagement with Tseycum First Nation, and on Indigenous Interests and concerns that were raised during the engagement, see Section 8.4.31.

### 8.3.31 Tsleil-Waututh Nation

Tsleil-Waututh Nation is an Indigenous Nation whose traditional territory includes areas of modern-day North Vancouver, Vancouver, Burnaby, Richmond, and Delta (Tsleil-Waututh Nation n.d.). The Tsleil-Waututh traditional territory encompasses approximately 190,000 ha, reaching from the Fraser River in the south to Mamquam Lake (east of Whistler) in the north, Coquitlam Lake in the east, and Howe Sound to the west. The heart of the Tsleil-Waututh community is now centred on Burrard Inlet, between Maplewood Flats and Deep Cove in North Vancouver, but traditional use studies and archaeological evidence show occupation of about 1,865 km<sup>2</sup> (190,000 hectares) (Tsleil-Waututh Nation n.d.).

GCT is engaging with Tsleil-Waututh Nation to determine areas where traditional activities are practiced relative to the Project location.

Tsleil-Waututh Nation has three reserves: Burrard Inlet 3, Inlailawatash 4, and Inlailawatash 4A (Indigenous and Northern Affairs Canada 2019). Burrard Inlet 3, the main community, is on the shore of the Burrard Inlet in North Vancouver. It is home to approximately half of its population (Indigenous and Northern Affairs Canada 2019). Tsleil-Waututh Nation also has two smaller reserves, Inlailawatash 4 and Inlailawatash 4A, which are located at the mouth of the Indian River and head of the Indian Arm of the Burrard Inlet (Tsleil-Waututh Nation n.d.). The Project location falls within Tsleil-Waututh Nation's consultation area and is thus subject to the conditions of the Tsleil-Waututh Nation Stewardship Policy (2009). The distance from the project to the administration office has been removed at the request of Tsleil-Waututh Nation.

References to the Treaty process have been removed at the request of Tsleil-Waututh Nation.

Tsleil-Waututh Nation sits on the Naut'sa mawt Tribal Council, along with Halalt First Nation, Stz'uminus First Nation, and Tsawwassen First Nation (Naut'sa mawt Tribal Council 2020). The Naut'sa mawt Tribal Council, founded in 1983, provides shared services to 11 member nations, clustered around the themes of economic development; financial management; community planning; technical services; and governance (Naut'sa mawt Tribal Council 2020).

Tsleil-Waututh Nation developed the 2009 Stewardship Policy in response to the high volume of referrals that Tsleil-Waututh Nation receives for various development projects within their territory. The Stewardship Policy is based on Tsleil-Waututh Aboriginal rights, title, and relationship to the land and applies to all surface, subsurface, air, land, water cultural and other resources within the Tsleil-Waututh Nation Consultation Area. The policy asserts laws and obligations around consultation and accommodation that project proponents are expected to follow.

Tsleil-Waututh Nation signed a framework agreement in 2019 under the *First Nations Land Management Act* (First Nations Land Management Resource Centre 2021).

For information on engagement with Tsleil-Waututh Nation, and on Indigenous Interests and concerns that were raised during early engagement, see Section 8.4.32.

### 8.3.32 T'Sou-ke Nation

T'Sou-ke Nation is a Coast Salish nation located on Vancouver Island, BC. T'Sou-ke Nation traditional territory includes an area from west of the Saanich Inlet to the southern tip of Vancouver Island but also includes the traditional territory claimed by the Te'mexw Treaty Association, which includes land from Port Alberni east to Parksville and marine and land areas south into Washington State (T'Sou-ke Nation, 2018; Indigenous and Northern Affairs Canada 2019).

GCT is engaging with T'Sou-ke Nation to determine areas where traditional activities are practiced relative to the Project location.

T'Sou-ke Nation has two reserves around the Sooke Basin on the Strait of Juan de Fuca at the southern end of Vancouver Island, T'Sou-ke 1 (26.3 ha) and T'Sou-ke 2 (40.9 ha), with a total area of 67.2 ha (Indigenous and Northern Affairs Canada 2019). T'Sou-ke 1 is located at the mouth of the Sooke River near the head of Sooke Harbour, T'Sou-ke 2 is the main community and is located on Sooke Bay on the South End of Vancouver Island. The administrative office is approximately 82 km from the Project location.

T'Sou-ke Nation was a signatory to one of the Douglas Treaties, late-19th-century treaties that documented signatory nations' rights to fish and hunt as formerly and retain existing village lands and fields for their use (Isaac 2016). The Douglas Treaties are discussed in Section 8.3.34.

T'Sou-ke Nation is a member of the Te'mexw Treaty Association, which is negotiating with Canada and BC in the BC Treaty Process on behalf of its five member-bands: Sc'ianew (Beecher Bay) First Nation, Malahat Nation, Snaw-Naw-As Nation, Songhees Nation, and T'Sou-ke Nation. They are currently in Stage 5 of the BC treaty process and have negotiated an Agreement in Principle (BC Treaty Commission 2020). T'Sou-ke Nation recently signed a framework agreement in 2020 under the *First Nations Land Management Act* (First Nations Land Management Resource Centre 2021).

For information on engagement with T'Sou-ke Nation, and on Indigenous Interests and concerns that were raised during early engagement, see Section 8.4.33.

### 8.3.33 Ts'uubaa-asatx Nation

Ts'uubaa-asatx Nation is near Cowichan Lake on Vancouver Island, BC. The asserted traditional lands of the Ts'uubaa-asatx Nation are in the Lake Cowichan area, the Salish Sea, the South Arm of the Fraser River, and up to Squamish Nation areas (Ts'uubaa-asatx n.d.). Ts'uubaa-asatx Nation has always made its primary home on Cowichan Lake.

GCT is engaging with Ts'uubaa-asatx Nation to determine areas where traditional activities are practiced relative to the Project location.

Ts'uubaa-asatx First Nation has one reserve, Cowichan Lake Reserve, on the north shore of Cowichan Lake (Indigenous and Northern Affairs Canada 2019). The administrative office is approximately 70 km from the Project location.

Ts'uubaa-asatx First Nation is part of the Hul'qumi'num Treaty Group, together with five other member bands, which together are negotiating with Canada and the Province of BC in the BC treaty process. In 2019, the Hul'qumi'num Treaty Group moved into the final stage of the BC treaty process (BC Treaty Commission 2020).

In 2006, Ts'uubaa-asatx Nation signed a letter of intent toward a forestry revenue-sharing agreement. In 2017, a Forest and Range Consultation and Revenue Sharing Agreement was finalized (BC Treaty Commission 2020). Ts'uubaa-asatx Nation has signed a framework agreement under the *First Nations Land Management Act* (First Nations Land Management Resource Centre 2021).

For information on engagement with Ts'uubaa-asatx Nation, and on Indigenous Interests and concerns that were raised during the engagement, see Section 8.4.34.

### 8.3.34 Douglas Treaty First Nations

The Douglas Treaties, also known as the Vancouver Island Treaties, were 14 treaties signed 1850-1854 by James Douglas, chief factor of Fort Victoria and governor of the colony of Vancouver Island, and Indigenous peoples around Victoria, Saanich, Sooke, Nanaimo, and Port Hardy, BC. The 14 Douglas Treaties cover approximately 927 square kilometres (Government of Canada 2015).

Nine of the Douglas Treaty First Nations are included in the engagement for the Project: Esquimalt Nation, Malahat Nation, Songhees Nation, Tsawout First Nation, Tsartlip First Nation, Pauquachin First Nation, Tseycum First Nation, Sc'ianew (Beecher Bay) First Nation, and T'Sou-ke Nation.

Under the Douglas Treaties, First Nations have retained the right to fish and hunt as formerly and retain existing village lands and fields for their use.

## 8.4 Summary of Preliminary Engagement with Indigenous Nations

Prior to engaging Indigenous nations and organizations, GCT undertook a comprehensive review of relevant agreements, MOUs, assessment protocols, treaties, and other publicly available information about potentially affected Indigenous nations. Where information was available, GCT used assessment protocols or assessment bodies identified by Indigenous nations to initiate early engagement through the appropriate avenues.

GCT began early engagement with Indigenous nations and organizations that GCT had identified as having established or asserted traditional territories, which encompass or are near the Project area, in the fall of 2016. GCT has communicated with the Indigenous nations and organizations through virtual meetings, phone calls, emails, and visits to administrative offices to confirm receipt of information and to answer any preliminary questions. Where contact information was not available, GCT made requests to the Indigenous nations and organizations for appropriate contacts regarding engagement on the Project. GCT will continue to seek feedback on topics of interest, point-of-contact and identify nation-specific consultation policies, protocols or preferences to better inform their engagement efforts. To support this work, GCT will verify an appropriate level of internal resourcing required and provide support, including capacity funding, to Indigenous nations and organizations when requested, that meet the needs of each Indigenous nation and organization.

In accordance with IAAC and BCEAO guidance, this section provides a summary of the engagement activities that have occurred and a summary of Indigenous Interests and issues raised by the Indigenous nations and organizations with respect to the Project during the early engagement phase. It provides a description of how GCT intends to address the issues, including the perspective of Indigenous nations on potential Project effects and a description of how Indigenous nations plan to engage with GCT moving forward. Although GCT is engaging with Indigenous nations to determine areas where Indigenous interests are exercised relative to the Project location, issues raised by the Indigenous nations also refer to interests and activities outside of the Project area. The following Summary of Key Engagement tables include areas where Indigenous interests are exercised both within and outside of the Project area.

GCT is committed to engaging identified Indigenous nations and organizations throughout the Impact Assessment process and beyond to identify appropriate information needs and requirements and to incorporate IK both in the identification and assessment of potential Project effects.

### 8.4.1 Cowichan Tribes

This section describes GCT's engagement with Cowichan Tribes during the Early Engagement Phase and includes information regarding its notice to engage as a PIN. Detailed records of engagement activities, key interests and issues raised by Cowichan Tribes are provided in Table 25 and Table 26.

GCT has engaged with Cowichan Tribes with letters, emails, phone calls, an in-person visit and a conference call. GCT has requested Cowichan Tribes identify their preferred methods of engagement for the Project. As engagement progresses, GCT is prepared to modify the methods of engagement should that be requested by Cowichan Tribes. In the meantime, GCT will continue to engage Cowichan Tribes through various methods.

GCT initiated engagement with Cowichan Tribes via an introductory letter and a follow-up phone call on March 3, 2020. On April 27, 2020, Cowichan Tribes indicated to GCT that it would be appropriate for GCT to discuss the Project with the Cowichan Nation communities, as Cowichan Tribes, Halalt First Nation, Lyackson First Nation, Penelakut

Tribe, and Stz'uminus First Nation have a mutual interest in the Project. GCT met with the Cowichan Nation communities of Cowichan Tribes, Halalt First Nation, Lyackson First Nation, and Stz'uminus First Nation on November 19, 2020, to discuss engagement, capacity funding, and drafting MOUs. GCT and Cowichan Tribes signed a Capacity Funding Agreement on February 9, 2021. GCT met with Cowichan Tribes, Halalt First Nation, and Lyackson First Nation between April and June 2021 to discuss capacity funding, updates to the draft DPD, VCs, the Joint Guidelines and Cowichan Tribes' Indigenous Interests.

Cowichan Tribes submitted their notice to engage as a PIN to the BCEAO on November 27, 2020. In their notice, Cowichan Tribes stated that along with their fellow Cowichan Nation communities (Halalt First Nation, Lyackson First Nation, Penelakut Tribe, and Stz'uminus First Nation), Cowichan Tribes asserts and maintains their right to fish and harvest within the Project area.

**Table 25: Summary of Key Engagement with Cowichan Tribes.**

Dates	Subject	Interaction Type	Summary of Engagement
March 3, 2020	Introduction	Email and Phone Call	<ul style="list-style-type: none"> <li>GCT called and emailed Cowichan Tribes to initiate engagement and inquire as to Cowichan Tribes' engagement preferences.</li> </ul>
March 9, 2020	Introduction	Phone Call	<ul style="list-style-type: none"> <li>GCT left a message with Cowichan Tribes providing a brief overview of the Project and advising that an introductory letter had been provided.</li> </ul>
March 17, 2020	Introduction	In-person	<ul style="list-style-type: none"> <li>GCT visited the Cowichan Tribes office and left a presentation about the Project with Cowichan Tribes.</li> </ul>
April 27, 2020	Formal table for engagement	Email	<ul style="list-style-type: none"> <li>Cowichan Tribes recommended GCT engage the Cowichan Nation communities jointly as they have a mutual interest in the Project. Members of the Cowichan Nation include:               <ul style="list-style-type: none"> <li>Cowichan Tribes</li> <li>Halalt First Nation</li> <li>Stz'uminus First Nation</li> <li>Penelakut Tribe</li> <li>Lyackson First Nation.</li> </ul> </li> </ul>
May 22, 2020	Capacity Funding	Email	<ul style="list-style-type: none"> <li>GCT contacted Cowichan Tribes to enquire about interest in accessing federal capacity funding.</li> </ul>
July 29, 2020	Presentation	Email	<ul style="list-style-type: none"> <li>GCT sent an updated Project presentation in preparation for the upcoming meeting.</li> </ul>



**Table 25: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
July 29, 2020	Presentation	Video call	<ul style="list-style-type: none"> <li>GCT held a meeting with Cowichan Tribes, Halalt First Nation, Lyackson First Nation, Penelakut, Tribe and Stz'uminus First Nation.</li> <li>GCT gave a presentation on the Project and discussed questions and concerns about the Project.</li> </ul>
September 25, 2020	Capacity Funding	Email	<ul style="list-style-type: none"> <li>GCT provided Cowichan Tribes with additional information on IAAC capacity funding.</li> </ul>
September 29, 2020	IPD	Email	<ul style="list-style-type: none"> <li>GCT provided an update on regulator approval of the IPD.</li> </ul>
September 29, 2020	Transport Canada	Email	<ul style="list-style-type: none"> <li>Cowichan Tribes provided information about their work on a Transport Canada initiative.</li> </ul>
October 15, 2020	Comment Period	Email	<ul style="list-style-type: none"> <li>GCT informed Cowichan Tribes about the comment period for IAAC.</li> </ul>
November 19, 2020	Assessment Process	Meeting	<ul style="list-style-type: none"> <li>GCT held a Virtual Open House meeting with Cowichan Tribes, Halalt First Nation, Lyackson First Nation and Stz'uminus First Nation to discuss the assessment process.</li> </ul>
November 19, 2020	Virtual Open House	Email	<ul style="list-style-type: none"> <li>GCT provided a presentation that was given at a recent Virtual Open House to Cowichan Tribes.</li> </ul>
December 10, 2020	IPD Comments	Email	<ul style="list-style-type: none"> <li>Cowichan Tribes, Halalt First Nation, Lyackson First Nation, Penelakut First Nation, and Stz'uminus First Nation submitted their comments on the IPD to the BC EAO.</li> </ul>
January 28, 2021	IPD Comments,	Meeting	<ul style="list-style-type: none"> <li>GCT met with Cowichan Tribes, Halalt First Nation, Lyackson First Nation, Penelakut First Nation, and Stz'uminus First Nation to discuss:               <ul style="list-style-type: none"> <li>Past studies</li> <li>Project timeline</li> <li>DPD comments.</li> </ul> </li> </ul>
January 29, 2021	JSOIE	Email	<ul style="list-style-type: none"> <li>GCT sent Cowichan Tribes the final Joint Summary of Issues and Engagement.</li> </ul>
January 29, 2021	IAAC Funding	Email	<ul style="list-style-type: none"> <li>GCT provided Cowichan Tribes with additional information on IAAC capacity funding.</li> </ul>

**Table 25: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
February 8, 2021	Capacity Funding Agreement	Email	<ul style="list-style-type: none"> <li>Cowichan Tribes sent GCT a signed copy of the Capacity Funding Agreement.</li> </ul>
February 9, 2021	Capacity Funding Agreement	Email	<ul style="list-style-type: none"> <li>GCT sent Cowichan Tribes the executed copy of the Capacity Funding Agreement.</li> </ul>
February 10, 2021	Project Schedule	Email	<ul style="list-style-type: none"> <li>GCT provided a detailed Project schedule for the Cowichan Tribes' review of the DPD and Joint Guidelines.</li> </ul>
February 24, 2021	Draft DPD Update	Email	<ul style="list-style-type: none"> <li>GCT informed Cowichan Tribes it was drafting the DPD and asked them to provide feedback on the types of studies and VCs they would like included in the DPD.</li> </ul>
April 7, 2021	Draft DPD Feedback Request	Email	<ul style="list-style-type: none"> <li>GCT sent Cowichan Tribes a copy of the draft DPD and requested feedback by May 7, 2021.</li> <li>GCT asked for a meeting to discuss the DPD, studies that Cowichan Tribes considers necessary in the review of the Project, and VCs.</li> </ul>
April 14, 2021	Draft DPD Follow up	Email	<ul style="list-style-type: none"> <li>GCT emailed Cowichan Tribes confirming receipt of the DPD and requesting that they provide feedback on the draft DPD by May 7, 2021, and to schedule a meeting.</li> </ul>
April 29, 2021	Impact Assessment Engagement	Meeting	<ul style="list-style-type: none"> <li>GCT met with Cowichan Tribes, Halalt First Nation, and Lyackson First Nation to discuss:               <ul style="list-style-type: none"> <li>Project update</li> <li>DPD</li> <li>Issues raised by Nations</li> <li>VC selection</li> <li>Indigenous Interests.</li> </ul> </li> </ul>
May 6, 2021	Draft DPD Feedback Extension	Email	<ul style="list-style-type: none"> <li>Cowichan Tribes requested an update on additional capacity funding, draft DPD, and access to the proposed Tsawwassen First Nation marina.</li> <li>Cowichan Tribes requested additional time to review the draft DPD.</li> </ul>

**Table 25: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
May 6, 2021	Feedback Extension and Capacity Funding	Email	<ul style="list-style-type: none"> <li>GCT inquired whether additional capacity funding was required at this time and the purpose of the funding. GCT provided updates on DPD changes.</li> <li>GCT agreed to a timeline extension for DPD feedback.</li> </ul>
May 7, 2021	Workshop Invitation	Email	<ul style="list-style-type: none"> <li>GCT invited Cowichan Tribes to an upcoming DPD workshop and provided a Project activity summary.</li> </ul>
May 11, 2021	Updated Issues Table Feedback	Email	<ul style="list-style-type: none"> <li>GCT provided an updated draft of DPD Chapter 8 which included content which Cowichan Tribes had requested be included on April 29, 2021. GCT requested feedback on the updates.</li> </ul>
May 19, 2021	Indigenous Interests Workshop Agenda	Email	<ul style="list-style-type: none"> <li>GCT proposed an agenda for the Indigenous Interests workshop which included discussing Indigenous Interests and VCs.</li> </ul>
June 4, 2021	Draft DPD Comments	Email	<ul style="list-style-type: none"> <li>Cowichan Tribes sent GCT their comments on the draft DPD.</li> </ul>
June 15, 2021	VCs and Indigenous Interests Workshop	Meeting	<ul style="list-style-type: none"> <li>GCT met with Cowichan Tribes, Halalt First Nation, Penelakut Tribe, and Lyackson First Nation to discuss:               <ul style="list-style-type: none"> <li>Project update</li> <li>Progress and refinement of VC selection</li> <li>Preliminary understanding of Cowichan Tribes Indigenous Interests potential project effects</li> <li>Cowichan Tribes identified issues and concerns and GCT provided responses to comments on the revised DPD.</li> </ul> </li> </ul>

During the Early Engagement Phase, Cowichan Tribes raised various issues related to the Project. These issues, along with Indigenous Interests raised by Cowichan Tribes and the corresponding GCT responses, are summarized in Table 26.

**Table 26: Summary of Indigenous Interests and Issues Raised by Cowichan Tribes.**

Indigenous Interests and Issues Raised	GCT Response
Use of area of Food, Social and Ceremonial (FSC) purposes and economic opportunities including Aboriginal Communal Fishing Licenses.	The Impact Assessment is required to assess the potential Project effects on marine use and Indigenous Interests. GCT will continue to engage with Cowichan Tribes on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Cowichan Tribes' Indigenous Interests identified in the draft Joint Guidelines.
Aboriginal title and fishing and harvesting rights to Tl'uqtinus village site.	The Impact Assessment is required to assess the potential Project effects on Indigenous Interests. GCT will continue to engage with Cowichan Tribes on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Cowichan Tribes' Indigenous Interests identified in the draft Joint Guidelines.
Recognition of other Indigenous nations' Rights & Title in the area.	The Impact Assessment is required to assess potential Project effects on Indigenous Interests and rights. GCT will continue to engage with Cowichan Tribes on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Cowichan Tribes' Indigenous Interests identified in the draft Joint Guidelines.
Principles of UNDRIP and of FPIC should be reflected in the document.	As noted in Section 1.4, GCT supports the principles of UNDRIP and FPIC. Further to this, the Federal and Provincial governments have taken various steps to incorporate UNDRIP principles into the new Impact Assessment. GCT will be following this process during the Project planning and assessment phase.
Questions and concerns about initial habitat inventory, cumulative impact assessment and past studies around sediment, coal dust, disposal at sea, eelgrass, and intertidal marsh mapping, water quality, noise, and fish habitat offsetting.	GCT will continue to engage with Cowichan Tribes to identify specific Project-related data gaps, and where further information and studies are potentially required.
Concerns and questions about mitigation and offsetting measures for fish/fish habitat, WMA, migratory birds, shellfish, marine flora, water quality, SRKW, scour protection, dust and noise control during construction and spill response.	GCT is committed to meaningful engagement for proposed mitigation and offsetting measures as the Project progresses through the Impact Assessment. GCT looks forward to engaging with Cowichan Tribes to address specific questions and concerns regarding mitigation and offsetting measures during construction, and spill response planning.

**Table 26: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>Concerns about the efficacy and efficiency of the Oceans Protection Plan and the impacts of Short Sea Shipping, including its impacts on fish, fish habitat and fishing rights in the Fraser River and its interference with the ability of Cowichan Tribes to exercise harvesting rights in the area. The cumulative impacts of Short Sea Shipping must be considered in the context of multiple proposed projects in the South Arm area.</p>	<p>The Impact Assessment is required to assess marine use, and marine navigation, wildlife, marine resources, the environment and Indigenous Interests and rights, including traditional use activities. GCT appreciates the importance of the Fraser River and supports the concept of re-establishing something similar to the Fraser River Estuary Management Plan (FREMP) by the relevant governments and agencies. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines for the Project and will be confirmed through additional engagement with Indigenous nations, stakeholders, the public, federal and provincial regulators. GCT will continue to engage with Cowichan Tribes on this concern during the Project planning and Impact Assessment phase.</p>
<p>Concerns about using current accommodations and programs (i.e., TMX accommodations) to ensure a favourable Impact Assessment. Those programs are meant to be specific to the TMX pipeline and should not be relied on in other projects, only referenced as additional measures occurring in/adjacent to the Project area.</p>	<p>Project-specific mitigations will be required for the Project. GCT will continue to engage with Cowichan Tribes on this issue during upcoming engagement activities.</p>
<p>Inclusion and accessibility of communities in environmental and heritage monitoring.</p>	<p>GCT will continue to engage with Cowichan Tribes during the Project planning and assessment phase about opportunities for them to be included in future environmental and heritage monitoring plans.</p>
<p>Request for job opportunities, accommodations for workers from outside Metro Vancouver, and for GCT to provide information and assistance to Indigenous individuals who are interested in operational employment.</p>	<p>GCT is committed to providing information and assistance to Cowichan Tribes members who are interested in operational employment and facilitating engagement with the BC Maritime Employers Association. GCT will engage with Cowichan Tribes about possible job opportunities and accommodation options during the Project planning and assessment phase of the Project.</p>
<p>Concerns that GCT has not outlined any commitments to work with our communities as to what specific benefits would best support our diverse needs and interests. Specifically in regard to the impacts a project of this magnitude would produce.</p>	<p>GCT has signed a Capacity Funding Agreement with Cowichan Tribes that provides for the development of a Memorandum of Understanding (MOU) that could lead to mutual benefit agreements with Cowichan Tribes.</p>

**Table 26: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>Concern with GCT’s approach that appears to privilege Treaty Rights over Aboriginal Rights. Despite documented strong fishing rights proximal to the Project area and the use of multiple Fishing Areas for Food, Social and Ceremonial quotas directly adjacent to the Project, Cowichan Tribes has not been provided with the opportunity to work in collaboration on marine harvesting access in the Project area. This has been raised on three occasions and GCT has failed to provide a satisfactory response. Cowichan Tribes seeks the same opportunities, funding, support, and benefits as afforded to other communities with rights in the Project area, including, amongst others, the opportunity for a new vessel marina and boat launch to support harvesting.</p>	<p>GCT will continue to engage with Cowichan Tribes to better understand the potential number and size of vessels Cowichan Tribes is proposing to have and accessibility to the area. GCT is committed to working towards potential solutions.</p>
<p>Concerns about increase in vessel traffic and increase in the size of vessels. Request that the impacts of larger vessels be fully considered in the assessment and expect GCT to commit to a maximum number of vessels per annum and base their impact assessment on this maximum number of vessels.</p>	<p>GCT plans to assess larger vessels and the maximum number of vessels expected to call at GCT. Container vessels call at GCT Deltaport on a fixed schedule and through many years of operating GCT Deltaport, there is an excellent understanding of the shipping lines. GCT has also commissioned independent studies of expected vessel calls (size and frequency) in the future, as described in the DPD.</p>
<p>Concerns about the lack of information provided to Cowichan Tribes about the Salish Sea Indigenous Guardians Association.</p>	<p>GCT is not involved in the ongoing operations of SSIGA, however, having heard of this concern GCT followed up and now understands that SSIGA and Cowichan Tribes representatives were in contact regarding an Indigenous-led cumulative effects initiative in October 2020.</p>
<p>Concerns about the fragile state of salmon. Request that GCT include a discussion about the currently deteriorating state of the Fraser River salmon run. Given the poor health of this run and the subsequent impacts to the Cowichan Tribes’ communities’ Food, Social, and Ceremonial quota, Cowichan Tribes have incredibly low risk tolerance for Project impacts that could further deteriorate the state of the Fraser River salmon run, its ability to provide needed subsistence and cultural resources for Indigenous communities, and the ability to exercise the Indigenous right to fish.</p>	<p>GCT acknowledges Cowichan Tribes’ concerns regarding salmon. Potential effects to salmon are acknowledged in the DPD, will be discussed in the Joint Guidelines that will describe the assessment methodology, and will be a key part of the Impact Assessment. We appreciate the importance of the states of the Fraser River salmon runs to the biological setting and have added such a statement to Section 6.3 of the DPD, as requested.</p>

**Table 26: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
Cowichan Tribes is unsatisfied with all the responses provided by GCT to date. The Cowichan Tribes require deeper engagement and meaningful responses to the concerns raised than has been provided by GCT thus far.	GCT acknowledges that there are unresolved concerns at this early stage of the assessment process. GCT will continue to engage with Cowichan Tribes on this issue during the Project planning and assessment phase. This will include discussions around the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8, and list of potential effects on Cowichan Tribes Indigenous Interests identified in the draft Joint Guidelines.
Concerns that GCT is using the lower number of transit from the estimate rather than the higher number to base the assessment off. Request that GCT base its assessment on the maximum number of transits.	GCT will use the maximum number of transits (1560 transits) in the assessment of potential effects. GCT will continue to engage with Cowichan Tribes on this issue during the Project planning and assessment phase.

Table 27 summarizes issues and concerns raised by Cowichan Tribes in relation DP4 project. At the request of the Cowichan Nations in order to support their review of the DPD, the table also includes issues raised in response to another proposed project in the Roberts Bank area, and which GCT understands may also be applicable to DP4.

**Table 27: Summary of Indigenous Interests and Issues Raised by Cowichan Tribes which may also be Applicable to the Project.**

Indigenous Interests and Issues Raised	GCT Response
Concerns about the increased vessel traffic due to the project and its effects on Cowichan Tribes hunting, fishing and harvesting grounds. This includes the disruption to migratory fish pathways (i.e., salmon) and birds dependent upon the river system in perpetuity.	The Impact Assessment is required to assess potential Project effects of the project on marine resources, fish, wildlife and Indigenous Interests. GCT will continue to engage with Cowichan Tribes on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8, and list of potential effects on Cowichan Tribes' Indigenous Interests identified in the draft Joint Guidelines.
Concerns about the Project-specific and cumulative impact of the erosion of intertidal and foreshore areas from vessel wake and the subsequent impacts on critical foreshore and intertidal habitats that support Cowichan Tribes' community through resources.	Alterations to coastal geomorphology will be considered in the assessment. This may include vessel wake. Alterations in coastal geomorphology may inform the effect pathway for the assessment of effects to VCs, such as, but not limited to, Fish and Fish Habitat, and Archaeology. GCT will continue to engage with Cowichan Tribes on this issue during the Project planning and assessment phase.
Concerns that the assessment of vessel wake should address wave period, cumulative effects, and shoreline topography, all of which are critical factors in assessing the potential erosion impacts of vessel wake.	The assessment of potential effects on coastal geomorphology may include an assessment of the effects of vessel wakes. The assessment could be focused on the maneuvering of vessels in the vicinity of the proposed Project and consider the potential wake effects from ship traffic in the shipping corridors. GCT will continue to engage with Cowichan Tribes on this issue during the Project planning and assessment phase.

**Table 27: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>Concern that the proposed project area is within the area of Cowichan Tribes' communal fishing license for conducting fishing for FSC purposes.</p>	<p>The Impact Assessment is required to assess potential Project effects on marine use and Indigenous interests. GCT will continue to engage with Cowichan Tribes on this issue during the project planning and assessment phase, including how the preliminary list of potential effects on Indigenous Interests identified in the Joint Guidelines can incorporate Cowichan Tribes' communal fishing license for conducting fishing for FSC purposes.</p>
<p>Concerns about the project imposing further damage to intertidal resources which will impact Cowichan Tribes' quantity and quality of marine harvest.</p>	<p>The Impact Assessment is required to assess potential Project effects on Indigenous Interests. GCT will continue to engage with Cowichan Tribes on this issue during the Project planning and assessment phase, including how the preliminary list of potential effects on Indigenous Interests identified in the Joint Guidelines can incorporate Cowichan Tribes' marine harvest of intertidal resources.</p>
<p>Concerns about project-related shipping effects on the reefs at Tumbo Island, as these reefs are of particular importance for fishing and for refuge.</p>	<p>The Impact Assessment will include an assessment of the vessels travelling in the shipping channels, including the ship traffic corridors near Tumbo Island. GCT will continue to engage with Cowichan Tribes on this issue during the Project planning and assessment phase.</p>
<p>Concerns about project effects on waterfront areas, as waterfront areas are areas of high archaeological potential, with burials being unearthed on shorelines due to erosion. This further alienates Indigenous nations from their cultural places.</p>	<p>The Impact Assessment is required to assess potential Project effects on physical and cultural heritage. GCT will continue to engage with Cowichan Tribes on this issue during the Project planning and assessment phase, including on how the preliminary list of potential effects on Indigenous Interests identified in the Joint Guidelines can incorporate effects on areas of high archaeological potential and use of cultural places.</p>
<p>Concerns about the threat of this project on biofilm and the subsequent effects on shore birds including the Western Sandpiper.</p>	<p>Biofilm will be considered in the assessment of potential Project effects including as a pathway to potential effects to shore birds including the Western Sandpiper.</p> <p>The presence of biofilm in proximity to the Project is understood to be limited in comparison to the RBT2 project footprint. GCT plans to complete field surveys to better understand existing biofilm conditions and potential Project effects. GCT will continue to engage with Cowichan Tribes on this issue during the Project planning and assessment phase.</p>
<p>Concerns about invasive species being brought into the area by project vessels and the inadequacy of the current invasive species inspection system. Invasive species brought into the area negatively affects native ecosystems, which subsequently leads to further loss of access and opportunities that are integral to Indigenous rights and how they are exercised.</p>	<p>GCT acknowledges Cowichan Tribes' concerns related to the introduction of invasive species and the current inspection system administered under Canadian legislation. GCT abides by all regulatory requirements for ships that are berthed at Deltaport but has no ability to direct or influence vessels at sea. GCT encourages Cowichan Tribes to communicate its concerns to Transport Canada who regulates activities such as ballast water exchange that could lead to the introduction of invasive species.</p>



**Table 27: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>Concerns related to accidents and malfunctions:</p> <ul style="list-style-type: none"> <li>Concerns about the potential for spills in the Salish Sea and the subsequent effects on Cowichan Tribes' way of life and Aboriginal Rights.</li> <li>Concerns and questions about container vessel casualty measures including emergency tub rescue, salvage capabilities, planning and collaborating on places of refuge, sea conditions and response gaps and worst-case vessel causality assessments.</li> <li>Concerns and questions about spill response to heavy bunker fuel oil including the fate of heavy bunker oils if spilled and extra measures to manage stranded and weathered bunker oil.</li> <li>Concerns and questions about shoreline cleanup measures, workforce and logistics for bunker oil and container-debris, shoreline response to Hazardous Noxious Substances (HNS), waste management of oily wastes, and container vessel loss exercises and planning.</li> </ul>	<p>As part of the Impact Assessment process, GCT will be required to complete an analysis of the risks of malfunctions and accidents in order to determine the potential effects of the risks, and present measures to be used in the case of an emergency. The Project-specific characteristics, GCT's capacity to impose mitigation, and the level of concern expressed by the public and Indigenous groups, among other factors, will be considered when conducting the risk analysis.</p>
<p>Concerns about potential gaps in the assessment methodology including the project-related marine shipping geographic scope of 12 nautical mile limit.</p>	<p>The spatial scope of the Impact Assessment will be determined by the IAAC and the BCEAO. Notwithstanding this determination, GCT will work with Indigenous nations to determine potential options to assess Project-related marine shipping effects in their traditional territory, which may extend beyond the spatial scope determined by the IAAC and the BCEAO. Such assessment will explore opportunities to partner with regulators and Indigenous nations on potential mitigation options and wider management initiatives.</p>

**Table 27: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>Concerns about the comprehensiveness of the cumulative effects assessment. Cowichan Tribes recommends that:</p> <ul style="list-style-type: none"> <li>Assessment should consider all the impacts on the Salish Sea, including contamination from point and diffuse land-based sources, the multiple impacts on salmon and other fish stocks, and the impacts from all vessel traffic;</li> <li>Proper co-development of “short-, medium-, and long-term targets for addressing cumulative effects, including consideration of the feasibility of reducing total underwater noise, strike/collision risk of vessels with marine species, and key contaminant levels over time.”</li> </ul>	<p>The Impact Assessment is required to assess potential cumulative effects from past, present and reasonably foreseeable projects in combination with potential residual effects resulting from DP4. Details of the Impact Assessment methodology have not yet been established for assessing potential cumulative changes to items such as underwater noise, strike/collision risk of vessels with marine species, and key contaminant levels over time. GCT will continue to engage with Cowichan Tribes through process planning when determining the specific methodology for the cumulative effects assessment.</p>
<p>Overall concern that the project will obstruct the exercise of Cowichan Tribes’ constitutionally protected fishing rights and prevent the passing down of cultural practices and Traditional Knowledge to the younger generation.</p>	<p>The Impact Assessment is required to assess the potential effects of the Project on Indigenous Interests, rights, and marine use. GCT will continue to engage with Cowichan Tribes on this issue during the Project planning and assessment phase, including how the preliminary list of potential effects on Indigenous Interests identified in the Joint Guidelines can incorporate Cowichan Tribes constitutionally protected fishing rights.</p>

### 8.4.2 Ditidaht First Nation

This section describes GCT’s engagement with Ditidaht First Nation during the Early Engagement Phase, and includes information regarding its notice to engage as a PIN. Detailed records of engagement activities, key interests and issues raised by Ditidaht First Nation are provided in Table 28 and Table 29.

GCT has engaged with Ditidaht First Nations through letters, emails, an in-person visit, and a conference call. GCT has asked Ditidaht First Nation to identify their preferred methods of engagement. As engagement progresses, GCT is prepared to modify the methods of engagement should that be requested by Ditidaht First Nation. In the meantime, GCT will continue to engage Ditidaht First Nation through various methods.

GCT initiated engagement with Ditidaht First Nation via an introductory letter on February 25, 2020. GCT and Ditidaht First Nation signed an initial funding agreement on December 21, 2020. GCT engaged with Ditidaht First Nation in May 2021 regarding the VC selection workshop, the draft DPD, and identifying Indigenous Interests for the Joint Guidelines.

Ditidaht First Nation submitted their notice to engage as a PIN to the BCEAO on December 17, 2020. In their notice, Ditidaht First Nation stated that they are committed to protecting the resources in their traditional territorial marine waters for future generations (Ditidaht, 2020).

**Table 28: Summary of Key Engagement with Ditidaht First Nation.**

Dates	Subject	Interaction Type	Summary of Engagement
February 25, 2020	Introduction	Letter	<ul style="list-style-type: none"> <li>GCT informed Ditidaht First Nation about the Project and requested input on the IPD and about Ditidaht First Nation’s engagement and participation preferences.</li> </ul>
March 16, 2020	Introduction	In-person	<ul style="list-style-type: none"> <li>GCT provided background information and a presentation package about the Project.</li> </ul>
September 9, 2020	Capacity Funding	Email	<ul style="list-style-type: none"> <li>GCT emailed Ditidaht First Nation with information on IAAC capacity funding.</li> </ul>
September 29, 2020	IPD	Email	<ul style="list-style-type: none"> <li>GCT provided Ditidaht First Nation with an update on regulator approval of the IPD.</li> </ul>
October 15, 2020	Comment Period	Email	<ul style="list-style-type: none"> <li>GCT informed Ditidaht First Nation about the comment period for IAAC.</li> </ul>
October 19, 2020	Presentation	Video Call	<ul style="list-style-type: none"> <li>GCT gave a presentation on the Project and discussed the following issues with Ditidaht First Nation:               <ul style="list-style-type: none"> <li>o Cumulative effects</li> <li>o Vessel traffic</li> <li>o Vessel encroachment on fishing grounds.</li> </ul> </li> </ul>
October 29, 2020	Capacity Funding	Email	<ul style="list-style-type: none"> <li>GCT provided Ditidaht First Nation information about federal government capacity funding opportunities relating to the Project.</li> </ul>
November 2, 2020	Virtual Open House	Email	<ul style="list-style-type: none"> <li>GCT invited Ditidaht First Nation to attend a Virtual Open House regarding the Project.</li> </ul>
December 21, 2020	Capacity Funding	Email	<ul style="list-style-type: none"> <li>GCT provided Ditidaht First Nation with a copy of the Executed initial funding agreement.</li> </ul>
February 8, 2021	Next Steps	Video call	<ul style="list-style-type: none"> <li>GCT discussed employment, monitoring, and the next steps in the Impact Assessment process with Ditidaht First Nation.</li> </ul>
February 8, 2021	Next Steps	Video call	<ul style="list-style-type: none"> <li>GCT discussed capacity funding, employment, monitoring, and the next steps in the Project assessment process with Ditidaht First Nation.</li> </ul>

**Table 28: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
February 10, 2021	Project Schedule	Email	<ul style="list-style-type: none"> <li>GCT provided a detailed Project schedule for Ditidaht First Nation’s review of the DPD and Joint Guidelines.</li> </ul>
February 18, 2021	Follow-Up	Phone Call	<ul style="list-style-type: none"> <li>GCT and Ditidaht First Nation discussed the DPD timeline.</li> </ul>
April 07, 2021	Draft DPD Feedback Request	Email	<ul style="list-style-type: none"> <li>GCT sent Ditidaht First Nation a copy of the draft DPD and requested feedback by May 7, 2021.</li> <li>GCT asked for a meeting to discuss the DPD, studies that Ditidaht First Nation considers necessary in the review of the Project, and VCs.</li> </ul>
April 15, 2021	Draft DPD Follow up	Email	<ul style="list-style-type: none"> <li>GCT emailed Ditidaht First Nation confirming receipt of the DPD and requesting that they provide feedback on the draft DPD by May 7, 2021, and to schedule a meeting.</li> </ul>
May 07, 2021	DPD Workshop Request	Email	<ul style="list-style-type: none"> <li>GCT requested a workshop with Ditidaht First Nation to discuss the following:               <ul style="list-style-type: none"> <li>Draft DPD feedback</li> <li>VC selection</li> <li>Indigenous Interests</li> <li>Joint Guidelines.</li> </ul> </li> </ul>
May 18, 2021	Workshop Request	Email	<ul style="list-style-type: none"> <li>GCT requested confirmation of Ditidaht First Nation’s interest in a workshop, or submitting comments on the draft DPD linked in the email.</li> </ul>
June 24, 2021	Workshop cancellation	Email	<ul style="list-style-type: none"> <li>Ditidaht First Nation cancelled the meeting due to a loss in the community.</li> </ul>

During early engagement, Ditidaht First Nation raised various issues related to the Project. These issues, along with Indigenous Interests raised by Ditidaht First Nation and the corresponding GCT responses, are summarized in Table 29.

**Table 29: Summary of Indigenous Interests and Issues Raised by Ditidaht First Nation.**

Indigenous Interests and Issues Raised	GCT Response
<p>Concerns about marine emergency and spill response and the effects of shipping traffic on member fishermen and species at risk, notably the Southern Resident Killer Whale. Ditidaht First Nation has consistently raised these concerns with the federal agencies in previous shipping comments, concerns with the Impact Assessment Agency of Canada, Transport Canada, Fisheries and Ocean Canada and the Coast Guard etc. Interest in participating in recovery planning for the SRKW.</p>	<p>The Impact Assessment is required to assess the potential for malfunctions and accidents including spill response and the potential Project environmental effects including changes to marine use.</p> <p>GCT is planning a risk-based approach for the assessment of malfunctions and accidents that could affect VCs and Indigenous Interests identified for the Project. This could include assessment of the consequence of incidents and consider potential environmental, economic, social, cultural and health effects and effects to Indigenous Interests.</p> <p>SRKW are critical species and their protection and conservation are important to GCT. Marine mammals including SRKW will be included in the Impact Assessment, and if the Project proceeds to permitting, the Project will also require a permit under the <i>Species at Risk Act</i>. GCT will engage with Indigenous nations including Ditidaht First Nation to co-determine how IK and Indigenous views will inform the Impact Assessment of potential effects where we have permission from Ditidaht First Nation to do so. The assessment of potential effects may include effects on tourism and the broader ecosystem. GCT looks forward to further engagement with Ditidaht First Nation on this issue as the Impact Assessment progresses and VC selections are defined.</p>
<p>Ditidaht First Nation expressed concern about the impacts of shipping on the safety of its fishermen near Swiftsure Bank and requested modern gear for fishers to ensure they can safely fish in proximity to transiting large container vessels.</p>	<p>The Impact Assessment is required to assess potential Project effects of marine use and marine navigation. GCT will continue to engage with Ditidaht First Nation on this issue during the Project planning and assessment phase.</p>
<p>Concern about the cumulative effects of marine shipping and other marine activities within Ditidaht Traditional Territories on the quality and quantity of food, and ceremonial fishing near Swiftsure Bank and Ditidaht First Nation aboriginal rights, title and culture.</p>	<p>The Impact Assessment is required to assess the potential Project effects on Indigenous Interests, including traditional use activities and culture. The assessment is also required to assess potential cumulative effects. GCT will continue to engage with Ditidaht First Nation on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 of the DPD, and list of potential effects on Ditidaht First Nations' Indigenous Interests identified in the Draft Joint Guidelines.</p>
<p>Interest in economic opportunities and Project benefits.</p>	<p>GCT will engage with Ditidaht First Nation about possible economic opportunities and Project benefits during the Project planning and assessment phase.</p>
<p>Concern about the potential effects on eelgrass and crabs.</p>	<p>The Impact Assessment is required to assess potential effects on the environment from the Project. GCT will continue to engage with Ditidaht First Nation in an effort to avoid and mitigate negative effects on the environment.</p>

**Table 29: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
Questions about the differences between the RBT2 project and the Project.	GCT provided information and available studies outlining the differences between the two projects.
Interest in learning more about Green Marine.	GCT provided information to Ditidaht First Nation regarding Green Marine.
Concern about marine management now and into the future, as the cumulative effects are currently unknown from the shipping traffic volume in the Strait of Juan de Fuca and other activities. Ditidaht First Nation treaty negotiation team is currently discussing co-management of Ditidaht traditional lands, waters and traditional food resources and the restoration, protection of salmon-bearing streams and rivers in Ditidaht Traditional Territory.	GCT is committed to meaningful engagement for proposed mitigation and offsetting measures as the Project progresses through the Impact Assessment. The Impact Assessment is required to assess marine use, and marine navigation, wildlife, marine resources and Indigenous Interests and rights, including traditional use activities. Details of the Impact Assessment methodology have not yet been established for assessing potential cumulative changes to items such as underwater noise, strike/collision risk of vessels with marine species, and key contaminant levels over time. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines for the Project and will be confirmed through additional engagement with Indigenous nations, stakeholders, the public, federal and provincial regulators. GCT will continue to engage with Ditidaht First Nation on this concern during the Project planning and assessment phase.
Need for long-term annual funding to develop their stewardship capacity and ensure the protection of all their cultural resources for future generations of the Ditidaht Membership.	GCT will continue discussions with Ditidaht First Nation on adequate funding for Ditidaht First Nation to develop its stewardship capacity.

### 8.4.3 Esquimalt Nation

This section describes GCT’s engagement with Esquimalt Nation during the Early Engagement Phase, and includes information regarding its notice to engage as a PIN. Detailed records of engagement activities, key interests and issues raised by Esquimalt Nation are provided in Table 30 and Table 31.

GCT engaged with Esquimalt Nation with letters, emails, and video calls. GCT has asked Esquimalt Nation to identify their preferred methods of engagement. As engagement progresses, GCT is prepared to modify the methods of engagement should that be requested by Esquimalt Nation. In the meantime, GCT will continue to engage Esquimalt Nation through various methods.

GCT initiated engagement with Esquimalt Nation via an introductory letter on February 25, 2020. GCT and Esquimalt Nation signed and executed an Initial Funding Agreement on November 23, 2020. GCT sent Esquimalt Nation a revised draft Framework Agreement on May 21, 2021. GCT met with Esquimalt Nation on June 15, 2021, to discuss coming to a mutually agreed to initial approach to Indigenous Knowledge sharing

Esquimalt Nation submitted its notice to engage as a PIN to the BCEAO on December 16, 2020. In their notice, Esquimalt Nation provided the information requested by the BCEAO, including information regarding representation, governance role, and preliminary interests.

**Table 30: Summary of Key Engagement with Esquimalt First Nation.**

Dates	Subject	Interaction Type	Summary of Engagement
February 25, 2020	Introduction	Letter	<ul style="list-style-type: none"> <li>GCT informed Esquimalt Nation about the Project and requested input on the IPD and about Esquimalt First Nation’s engagement and participation preferences.</li> </ul>
March 19, 2020	Introduction	Email	<ul style="list-style-type: none"> <li>GCT sent Esquimalt Nation a presentation about the Project and a request for a conference call to discuss further.</li> </ul>
July 2, 2020	Reports	Email	<ul style="list-style-type: none"> <li>As requested, GCT provided reports to Esquimalt Nation, including:               <ul style="list-style-type: none"> <li><i>Analysis of Capacity Options on the West Coast of Canada</i> by Black Quay Consulting</li> <li><i>GCT Deltaport Expansion: Offsetting Outline and Approach</i> by Hemmera Envirochem</li> <li><i>Preliminary Environmental Impacts Comparison: RBT2 &amp; DP4</i> by PGL Environmental Consultants</li> <li><i>Assessment of Policy Options to Satisfy Canadian West Coast Container Port Capacity Needs</i> by Transport Canada</li> <li><i>Global Container Terminals Conceptual DFO Fisheries Offset Plan</i> by Amec Foster Wheeler.</li> </ul> </li> </ul>
July 13, 2020	Presentation	Video Call	<ul style="list-style-type: none"> <li>GCT provided a presentation on the Project and answered questions related to capacity funding and the Impact Assessment.</li> </ul>
July 30, 2020	Due Diligence Funding	Video Call	<ul style="list-style-type: none"> <li>GCT and Esquimalt Nation discussed the initial budget for developing a work plan and the negotiation of a benefits agreement.</li> </ul>
September 23, 2020	Reports	Email	<ul style="list-style-type: none"> <li>GCT provided Esquimalt Nation with a report titled:               <ul style="list-style-type: none"> <li><i>Economic Impact Study of the Proposed GCT Deltaport Expansion, Berth Four Project (DP4)</i> by MNP</li> </ul> </li> </ul>
September 29, 2020	IPD	Email	<ul style="list-style-type: none"> <li>GCT provided an update on regulator approval of the IPD.</li> </ul>

**Table 30: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
October 15, 2020	Comment Period	Email	<ul style="list-style-type: none"> <li>GCT informed Esquimalt Nation about the comment period for IAAC.</li> </ul>
October 30, 2020	Capacity Funding	Email	<ul style="list-style-type: none"> <li>GCT sent Draft Initial Funding Agreement to Esquimalt First Nation.</li> </ul>
November 23, 2020	Capacity Funding	Email	<ul style="list-style-type: none"> <li>Finalized Initial Funding Agreement signed.</li> </ul>
December 31, 2020	Report	Email	<ul style="list-style-type: none"> <li>GCT provided Esquimalt Nation with a copy of the Federal Court of Appeal decision concerning the VFPA.</li> </ul>
January 22, 2021	DPD	Meeting	<ul style="list-style-type: none"> <li>GCT met with Esquimalt Nation to discuss:               <ul style="list-style-type: none"> <li>Process and timeline for DPD.</li> <li>Addressing initial comments on DPD.</li> <li>Draft Negotiation Framework Agreement.</li> </ul> </li> </ul>
January 26, 2021	Reports	Email	<ul style="list-style-type: none"> <li>GCT provided Esquimalt Nation with information pertaining to:               <ul style="list-style-type: none"> <li>Federal announcement about capacity funding provided through IAAC</li> <li>Participant Funding Program Application Form for the Planning Phase of Impact Assessments</li> <li>GCT announcement of contribution to seed funding to facilitate indigenous communities' participation in cumulative effects initiative</li> <li>Salish Sea Initiative Grant and Contributions</li> <li>Fisheries and Oceans Salish Sea Initiative</li> <li>Salish Sea Initiative Presentation</li> </ul> </li> </ul>
January 29, 2021	JSOIE	Email	<ul style="list-style-type: none"> <li>GCT sent Esquimalt Nation the final Joint Summary of Issues and Engagement.</li> </ul>
February 10, 2021	Project Schedule	Email	<ul style="list-style-type: none"> <li>GCT provided a detailed Project schedule for Esquimalt Nation's review of the DPD and Joint Guidelines.</li> </ul>
April 7, 2021	Draft DPD Feedback Request	Email	<ul style="list-style-type: none"> <li>GCT sent Esquimalt Nation a copy of the draft DPD and requested feedback by May 7, 2021.</li> <li>GCT requested a meeting to discuss the DPD, studies that Esquimalt Nation considers necessary in the review of the Project, and Esquimalt Nation's VCs.</li> </ul>



**Table 30: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
April 15, 2021	Draft DPD Follow up	Email	<ul style="list-style-type: none"> <li>GCT emailed Esquimalt Nation confirming receipt of the DPD and requesting that they provide feedback on the draft DPD by May 7, 2021, and to schedule a meeting.</li> </ul>
May 7, 2021	Workshop Request	Email	<ul style="list-style-type: none"> <li>GCT requested a workshop with Esquimalt First Nation to discuss the following:               <ul style="list-style-type: none"> <li>Draft DPD feedback</li> <li>VC selection</li> <li>Indigenous Interests</li> <li>Joint Guidelines.</li> </ul> </li> </ul>
May 14, 2021	Draft Framework Agreement	Email	<ul style="list-style-type: none"> <li>Esquimalt provided GCT with the revised draft Framework Agreement.</li> </ul>
May 21, 2021	Revised Framework Agreement	Email	<ul style="list-style-type: none"> <li>GCT emailed Esquimalt Nation with a revised Framework Agreement</li> </ul>
June 1, 2021	Indigenous Knowledge Sharing Agreement	Email	<ul style="list-style-type: none"> <li>GCT sent Esquimalt First Nation the proposed Indigenous Knowledge Sharing Agreement, noting it would be part of the Framework Agreement.</li> </ul>
June 15, 2021	Indigenous Knowledge Sharing	Meeting	<ul style="list-style-type: none"> <li>GCT met with the Esquimalt Nation to discuss coming to a mutually agreed to initial approach to Indigenous Knowledge sharing.</li> </ul>

During early engagement, Esquimalt Nation raised various issues related to the Project. These issues, along with Indigenous Interests raised by Esquimalt Nation and the corresponding GCT responses, are summarized in Table 31.

**Table 31: Summary of Indigenous Interests and Issues Raised by Esquimalt Nation.**

Indigenous Interests and Issues Raised	GCT Response
Interest in economic opportunities and Project benefits. Specifically, Esquimalt Nation noted interests in exploring opportunities related to clean up in Victoria and Esquimalt harbours, shipyard and the Salish Seaside RV Haven-related partnerships and business opportunities.	GCT will engage with Esquimalt Nation about possible economic opportunities and Project benefits during the Project planning and assessment phase, and, specifically, explore opportunities related to the shipyard and the Salish Seaside RV Haven.

**Table 31: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>Concern about the effects of Project construction, operation and marine shipping on water quality, fish/fish habitat (including Sockeye, Chinook and Coho salmon), migratory birds, shellfish, aquatic plants, marine mammals, wildlife, the propagation of invasive species, the health of the ocean and the subsequent effects to resources.</p>	<p>The Impact Assessment is required to assess potential Project effects on water quality, fish, vegetation, wildlife, marine resources, and Indigenous Interests. GCT will continue to engage with Esquimalt Nation on these issues during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in Section 7.8.</p>
<p>Concerns about the cumulative effects of this and other projects using or seeking to use Esquimalt Nation's Traditional Territories and Esquimalt Nation's ability to participate meaningfully in the management of those effects. The cumulative effects associated with the Project should be thoroughly assessed.</p>	<p>The Impact Assessment is required to assess potential cumulative effects and effects to Indigenous interests from the Project. To assess the cumulative effects on a given VC, the residual effects of the Project will be assessed in combination with the potential effects of other past, present and reasonably foreseeable projects (projects that are either proposed (public disclosure) or have been approved to be built but are not yet built) and activities that overlap with the effects of the Project. The factors to be considered, and the scope of those factors, will be described in the Project Joint Guidelines. The IAAC and BCEAO will engage with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuance of the final Joint Guidelines.</p> <p>While not related to the Project specifically, GCT also informed the Esquimalt Nation about the SSIGA initiative related to cumulative effects, and provided contact information if they have any interest in collaborating.</p>
<p>Effective monitoring throughout the life of the Project.</p>	<p>GCT will continue to engage with Esquimalt Nation during the Project planning and assessment phase about monitoring plans.</p>
<p>Avoidance and mitigation of negative impacts to the greatest extent possible with rehabilitation in areas where harm is caused.</p>	<p>The Impact Assessment is required to assess potential effects on the environment from the Project. GCT will continue to engage with Esquimalt Nation during the Project planning and assessment in an effort to avoid and mitigate adverse effects to the environment.</p>
<p>The Project must not unreasonably interfere with Esquimalt Nation's traditional practices and their deep connection to the ocean and its resources. If harm is done to the ocean and its resources, it is harming Esquimalt Nation's culture. Where harm is done, action must be taken to address the harm and compensation must be provided to Esquimalt Nation for any adverse Project impacts, including any cultural interference or loss caused as a result of the Project.</p>	<p>GCT will engage with Esquimalt Nation to avoid potential cultural interference or loss associated with the Project. Where potential interactions occur between the Project and culture, GCT will engage with Esquimalt Nation to develop and apply mitigation measures.</p>

**Table 31: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
Share of wealth generated as a result of the Project, with preferential access to jobs, training and business opportunities.	GCT will engage with Esquimalt Nation about possible job opportunities and other potential economic benefits during the Project planning and Impact Assessment phase.
Impact assessments should be properly scoped and completed to ensure that the Project does not unjustifiably infringe on Aboriginal or treaty rights and title, including resource harvesting and other traditional practices.	The Impact Assessment is required to assess the potential effects of the Project on Indigenous Interests and rights. GCT will continue to engage with Esquimalt Nation on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Esquimalt Nation’s Indigenous Interests identified in the draft Joint Guidelines.
Interest and concern about the impacts of Project construction, operation and marine shipping on Esquimalt First Nation’s cultural and heritage sites, member safety, and economic interests.	The Impact Assessment is required to assess the potential effects of the Project on Indigenous Interests and safety. GCT will continue to engage with Esquimalt Nation on these issues during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Esquimalt Nation’s Indigenous Interests identified in the draft Joint Guidelines. To facilitate discussion regarding some concerns around marine shipping, GCT has offered to invite the BC Chamber of Shipping to a future meeting.
Concerns about the accuracy of market projections for shipping containers and the assessment of Project alternatives.	GCT has engaged with Esquimalt Nation about the shipping container market and the assessment of Project alternatives. GCT has provided Esquimalt Nation with a copy of the study that examines the levels of cargo that are destined for the USA vs. Canada ( <a href="#">Mercator Analysis of BC Ports Container Volume by Origin and Destination</a> )
Concerns about the impacts of accidents and malfunctions on water quality, fish, migratory birds, shellfish, aquatic plants, marine mammals, wildlife, the health of the ocean and resources, the land, cultural and heritage sites, and the physical, mental, and economic health of Esquimalt Nation people.	The Impact Assessment is required to assess the risk of and response to malfunctions and accidents and the potential effects to fish, wildlife, vegetation, human health, marine resources and Indigenous Interests., GCT will be required to complete an analysis of the risks of malfunctions and accidents in order to determine the potential effects of the risks, and present measures to be used in the case of an emergency. The Project-specific characteristics, GCT’s capacity to impose mitigation, and the level of concern expressed by the public and Indigenous groups, among other factors, will be considered when conducting the risk analysis.
Assessment should extend beyond the 12 nautical mile limit to 200 nautical miles. Impacts outside Esquimalt waters can impact Esquimalt too.	The spatial scope of the Impact Assessment will be determined by the IAAC and the BCEAO. Notwithstanding this determination, GCT will work with Indigenous nations to determine potential options to assess Project-related marine shipping effects in their traditional territory, which may extend beyond the spatial scope determined by the IAAC and the BCEAO. Such assessment will explore opportunities to partner with regulators and Indigenous nations on potential mitigation options and wider management initiatives.

**Table 31: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>Concerns about emergency preparedness and response and the need for sufficient government, organization, and volunteer capacity to respond to an accident or malfunction at the project site or with a container ship.</p>	<p>The Impact Assessment is required to assess the potential for malfunctions and accidents, including emergency preparedness and response. GCT will be required to complete an analysis of the risks of Project-related malfunctions and accidents, in order to determine the potential effects of the risks, and present mitigation measures to be used in the case of an emergency. The Project-specific characteristics, GCT's capacity to impose mitigation, and the level of concern expressed by the public and Indigenous groups, among other factors, will be considered when conducting the risk analysis. GCT will continue to engage with Esquimalt Nation on this issue during the Project planning and assessment phase.</p>
<p>Concerns about invasive species being brought into the area from ballast water and travelling ships.</p>	<p>GCT acknowledges Esquimalt Nation's concerns related to the introduction of invasive species from ships' ballast water. GCT abides by all regulatory requirements for ships that are berthed at Deltaport but has no ability to direct or influence vessels at sea. GCT encourages Cowichan Tribes to communicate its concerns to Transport Canada who regulates activities such as ballast water exchange that could lead to the introduction of invasive species.</p>
<p>Concerns about the clarity of the terms in which the short sea shipping berth is being assessed/approved. If construction or operation of the berth is materially different than estimated or there are unanticipated impacts from short sea shipping, the Project conditions must trigger additional consultation with Esquimalt Nation and other impacted Indigenous groups.</p>	<p>GCT is pursuing a Project design that accommodates a short sea shipping berth in anticipation that governments may mandate alternatives to trucking in the future, or dynamics in the market may change. To GCT's knowledge, only two examples of short sea shipping exist in the region, and no other short sea shipping services are currently being planned outside of GCT Deltaport. As such, it is not possible at this stage to ascertain if, when or where such facilities outside of GCT Deltaport would be constructed. It is similarly not feasible to make predictions about the volumes of marine traffic associated with short sea shipping, or shipping routes, which are not clearly defined unlike shipping routes for traditional container vessels (which GCT will be assessing, along with potential impacts associated with the construction of the short sea shipping berth).</p>
<p>Concerns about disposing dredged material at sea. If proposed, Esquimalt Nation seeks further engagement on the location and impacts.</p>	<p>GCT understands the requirements for a waste prevention audit and assessment of alternatives for Disposal at Sea under the Canadian Environmental Protection Act and as highlighted in the DPD, alternatives will be assessed with a view to avoiding or minimizing Disposal at Sea within the Impact Assessment. If Disposal at Sea is required, it will be assessed within the Impact Assessment and GCT commits to further engagement with Esquimalt Nation on the potential locations for and effects of Disposal at Sea.</p>

**Table 31: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>Concerns and questions about where construction material will be sourced, how many vessels will be transporting construction material, if any hazardous materials will be transported and what precautions will be taken to ensure the hazardous materials are not released into the environment.</p>	<p>The majority of the material used for infilling during the Project will consist of dredgeate sourced from within the disturbance area of the Project footprint and will also be generated from the Fraser River annual maintenance dredge program. Specifications for handling dredgeate, fill, and the remaining finishing materials for the Project will be developed during detailed design. Alternative logistics for sourcing and transporting these finishing materials will be assessed during the Impact Assessment.</p>
<p>Concerns about GCT’s statement that marine shipping impacts are “beyond GCT’s care and control”. GCT can ensure these and other marine shipping-related measures are implemented through contractual relationships with the shipping industry and terminal acceptance standards.</p>	<p>GCT acknowledges Esquimalt Nation’s concerns related to marine shipping impacts. GCT will engage with Esquimalt Nation to better understand which marine shipping impacts Esquimalt Nation wants to have addressed, and examine what could potentially be included in contracts. The VFPA, which has regulatory powers, is already implementing marine shipping related initiatives including the ECHO program and Blue Circle Awards.</p>
<p>Concern about the trustworthiness of studies used by GCT that support the claim that there is no appreciable sediment contamination within Roberts Bank area due to industrialization. Esquimalt Nation would like GCT to walk them through the studies that support this claim and suggest any proposed mitigation measures relating to sediment contamination.</p>	<p>GCT acknowledges Esquimalt Nation’s concern about sediment contamination. The statements in the DPD are based on previous studies and only provide the setting for the Project at this early stage. GCT is planning additional studies and to consider sediment quality within the Impact Assessment. Based on regulatory requirements and engagement with Indigenous nations, GCT is drafting Joint Guidelines to define the Project assessment scope, including in relation to potential sediment contamination. After GCT provides the draft Joint Guidelines to BC EAO and IAAC, they will consult with Indigenous Nations and determine the final scope. GCT looks forward to further engagement with Esquimalt Nation on this issue.</p>
<p>Concerns that GHG emissions are not being assessed beyond 2050, since the Project is not planning on being decommissioned. Interest in understanding GHG emissions from the marine shipping component of the Project and further exploring measures to minimize those emissions.</p>	<p>It was not GCT's intent to imply that the project would be decommissioned in 2050. As per the guidelines for GHG assessment, a project life is required to calculate total project emissions, however, GHG emissions are also provided on an annual basis in the DPD. The worst case is that these emissions would continue beyond 2050. However, GCT is continuing to explore the potential for achieving net-zero emissions by 2050 and has a history of successful emissions reduction at GCT Deltaport.</p> <p>GCT acknowledges Esquimalt Nation's interest in understanding GHG emissions from marine shipping. Based on regulatory requirements and engagement with Indigenous nations, GCT is drafting Joint Guidelines to define the Project assessment scope. After we provide the draft Joint Guidelines to BC EAO and IAAC, they will consult Esquimalt Nation and determine the final scope.</p>

**Table 31: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
Concerns that Esquimalt Nation rights in relation to other species, beyond crabs, are not adequately considered and assessed.	Sections 7.2-7.7 of the DPD broadly discuss the different aspects of effects that were used to inform potential VCs. A preliminary list of Indigenous Interests in Section 7.8 is based on input from Indigenous Nations. Specific interests of the Esquimalt Nation will be further detailed in the Esquimalt Nation portion of the draft Joint Guidelines.
Concerns about marine shipping noise on SRKW. Request that underwater acoustic equipment be turned down or off to reduce underwater noise around the terminal.	GCT appreciates Esquimalt’s concern regarding underwater noise from marine shipping. GCT understands that the primary source of underwater noise from shipping is from the propellers. Underwater noise generated at the terminal will be considered in the assessment and mitigations implemented to minimize underwater noise.
Concerns that the potential for containers falling overboard is not listed as a potential accident and malfunction. Questions about the types of goods and materials that are transported in containers, how those goods and services are managed depending on potential risks, the frequency in which containers are lost at sea and how the loss of a container with hazardous goods or materials would be responded to.	GCT is planning a risk-based approach for the assessment of malfunctions and accidents that could impact VCs and Indigenous Interests and looks forward to further engagement with Esquimalt Nation on the scope of this important component of the Impact Assessment. Based on regulatory requirements and engagement with Indigenous nations, GCT is drafting Joint Guidelines to define the Project assessment scope. After GCT provides the draft Joint Guidelines to BC EAO and IAAC, they will consult Esquimalt Nation and determine the final scope.
Mitigation measures should be put in place to minimize the risk of a vessel capsizing, grounding, or colliding with another vessel due to an earthquake and resulting tsunami.	GCT acknowledges Esquimalt Nation’s request to implement mitigation for tsunami risk on vessels, although recognizing GCT does not own or operate vessels. The effects of the environment on the Project will be assessed in the Impact Assessment and mitigation measures will be described. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines and will be confirmed through additional engagement with Indigenous nations, stakeholders, the public, federal and provincial regulators. .
Interests in exploring ways in which GCT can build or use capacity for Project-related monitoring, reporting and adaptive management.	GCT will continue to engage with Esquimalt Nation to explore opportunities for Esquimalt Nation to participate in Project-related monitoring, reporting, and adaptive management.

#### 8.4.4 First Nations of the Maa-nulth Treaty Society

This section describes GCT’s engagement with the First Nations of the Maa-nulth Treaty Society during the Early Engagement Phase and includes information regarding their notice to engage as a PIN. Detailed records of engagement activities, key interests and issues raised by the First Nations of the Maa-nulth Treaty Society are provided in Table 32 and Table 33.

GCT is engaging with the five First Nations of the Maa-nulth Treaty Society: the Yuułu?i?ath Government, Huu-ay-aht First Nations, Toquaht Nation, Ka:'yu:'k't'h'/Che:k'tles7et'h' First Nations, and Uchucklesaht Tribe via the First Nations of the Maa-nulth Treaty Society. GCT has engaged with the First Nations of the Maa-nulth Treaty Society through letters, emails, phone calls, video calls and an in-person visit.

GCT initiated engagement with the First Nations of the Maa-nulth Treaty Society via an introductory letter on February 25, 2020. GCT signed an Initial Funding Agreement with the First Nations of the Maa-nulth Treaty Society on November 4, 2020, which provided funding for the First Nations of the Maa-nulth Treaty Society to participate in the Impact Assessment process and negotiate subsequent agreements. GCT and the First Nations of the Maa-nulth Treaty Society met between November and December 2020 to discuss the draft Framework Agreement and the process and timeline for IAAC/BCEAO consultations. An additional meeting was held in March 2021 where discussions took place about studies to be included in the Impact Assessment, GCT and First Nations of the Maa-nulth Treaty Society's initial work on the selection of VCs, fish habitat and invasive species. GCT met with First Nations of the Maa-nulth Treaty Society between April and June 2021 to discuss their comments on the DPD, VC selection, the Joint Guidelines, and capacity funding.

First Nations of the Maa-nulth Treaty Society submitted their notice to engage as a PIN to the BCEAO on November 27, 2020. In their notice, First Nations of the Maa-nulth Treaty Society stated that they represent their five-member First Nations in the Project engagement process, namely: Huu-ay-aht First Nations; Ka:'yu:'k't'h'/Che:k'tles7et'h' First Nations; Toquaht Nation; Uchucklesaht Tribe; and Yuułu?i?ath Government.

**Table 32: Summary of Key Engagement with the First Nations of the Maa-nulth Treaty Society.**

Dates	Subject	Interaction Type	Summary of Engagement
February 25, 2020	Introduction	Letter	<ul style="list-style-type: none"> <li>GCT provided information about the Project, requested input from the First Nations of the Maa-nulth Treaty Society on the IPD and about engagement and participation preferences.</li> </ul>
March 16, 2020	Introduction	In-person	<ul style="list-style-type: none"> <li>GCT visited the First Nations of the Maa-nulth Treaty Society offices and dropped off a presentation package about the Project.</li> </ul>
June 25, 2020	Presentation	Video Call	<ul style="list-style-type: none"> <li>GCT provided a presentation on the Project</li> <li>GCT met with the First Nations of the Maa-nulth Treaty Society to discuss:               <ul style="list-style-type: none"> <li>Issues and concerns raised</li> <li>Agreements that GCT should be aware of that may impact First Nations of the Maa-nulth Treaty Society engagement with GCT</li> </ul> </li> </ul>

**Table 32: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
July 2, 2020	Reports	Email	<ul style="list-style-type: none"> <li>• As requested, GCT provided the First Nations of the Maa-nulth Treaty Society with the following reports:               <ul style="list-style-type: none"> <li>○ Analysis of Capacity Options on the West Coast of Canada by Black Quay Consulting</li> <li>○ GCT Deltaport Expansion: Offsetting Outline and Approach by Hemmera Envirochem</li> <li>○ Preliminary Environmental Impacts Comparison: RBT2 &amp; DP4 by PGL Environmental Consultants</li> <li>○ Assessment of Policy Options to Satisfy Canadian West Coast Container Port Capacity Needs by Transport Canada</li> <li>○ Global Container Terminals Conceptual Fisheries Offsetting Plan by Amec Foster Wheeler.</li> </ul> </li> </ul>
September 18, 2020	Report	Email	<ul style="list-style-type: none"> <li>• GCT provided an update on regulator approval of IPD and shared a copy of the IPD.</li> </ul>
September 23, 2020	IPD	Email	<ul style="list-style-type: none"> <li>• GCT sent the following to the First Nations of the Maa-nulth Treaty Society:               <ul style="list-style-type: none"> <li>○ Economic Impact Study of the Proposed GCT Deltaport Expansion, Berth Four Project (DP4) by MNP</li> </ul> </li> </ul>
October 15, 2020	Comment Period	Email	<ul style="list-style-type: none"> <li>• GCT provided an update on regulator approval of IPD.</li> </ul>
October 16, 2020	Capacity Funding	Email	<ul style="list-style-type: none"> <li>• GCT informed the First Nations of the Maa-nulth Treaty Society about the comment period for IAAC.</li> </ul>
November 2, 2020	Virtual Open House	Email	<ul style="list-style-type: none"> <li>• GCT invited the First Nations of the Maa-nulth Treaty Society to attend Virtual Open Houses.</li> </ul>
November 4, 2020	Initial Funding Agreement	Agreement	<ul style="list-style-type: none"> <li>• GCT and the First Nations of the Maa-nulth Treaty Society signed an initial funding agreement, which provided them with funding to participate in the assessment and to negotiate a framework agreement and potential MBA.</li> </ul>



**Table 32: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
November 18, 2020	Draft Framework Agreement	Conference call	<ul style="list-style-type: none"> <li>GCT met with the First Nations of the Maa-nulth Treaty Society to discuss:               <ul style="list-style-type: none"> <li>Framework Agreement</li> <li>IAAC Planning Phase Engagement</li> </ul> </li> </ul>
December 31, 2020	Report	Email	<ul style="list-style-type: none"> <li>GCT met with the First Nations of the Maa-nulth Treaty Society to discuss:               <ul style="list-style-type: none"> <li>Update on IAAC/BCEAO Consultations</li> </ul> </li> </ul>
January 11, 2021	DPD	Meeting	<ul style="list-style-type: none"> <li>GCT met with the First Nations of the Maa-nulth Treaty Society to discuss:               <ul style="list-style-type: none"> <li>Process and timeline for DPD</li> <li>Addressing initial comments on IPD</li> </ul> </li> </ul>
January 12, 2021	Reports	Email	<ul style="list-style-type: none"> <li>GCT provided reports to the First Nations of the Maa-nulth Treaty Society including:               <ul style="list-style-type: none"> <li>Analysis of Capacity Options on the West Coast of Canada by Black Quay Consulting</li> <li>Analysis of BC Ports Container Volume by Origin/Destination by Mercator</li> </ul> </li> </ul>
January 26, 2021	Reports	Email	<ul style="list-style-type: none"> <li>GCT provided reports to the First Nations of the Maa-nulth Treaty Society including:               <ul style="list-style-type: none"> <li>Participant Funding Program</li> <li>Application Form for the Planning Phase of Impact Assessments</li> <li>IAAC Participant Funding Announcement</li> <li>Salish Sea Initiative Grant and Contributions</li> <li>Salish Sea Initiative Presentation</li> <li>DFO Arms-Length Fund</li> <li>Draft National Framework for Assessing the Cumulative Effects of Marine Shipping.</li> </ul> </li> </ul>
February 25, 2021	VC Selection, DPD	Meeting	<ul style="list-style-type: none"> <li>GCT met with the First Nations of the Maa-nulth Treaty Society to discuss VC Selection, DPD, and EA methods, as well as the next steps for a framework agreement.</li> </ul>

**Table 32: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
March 3, 2021	Report	Email	<ul style="list-style-type: none"> <li>GCT provided the First Nations of the Maa-nulth Treaty Society with a report titled Vessel Traffic in Canada’s Pacific Region.</li> </ul>
March 5, 2021	News Story	Email	<ul style="list-style-type: none"> <li>GCT provided the First Nations of the Maa-nulth Treaty Society with a news story about shipping containers lost at sea.</li> </ul>
March 5, 2021	Impact Assessment Studies, VCs	Meeting	<ul style="list-style-type: none"> <li>GCT met with the First Nations of the Maa-nulth Treaty Society to discuss VC selection and EA studies.</li> <li>First Nations of the Maa-nulth Treaty Society provided GCT with confidential material to support ongoing discussions with GCT.</li> </ul>
March 15, 2021	Reports	Email	<ul style="list-style-type: none"> <li>GCT provided the First Nations of the Maa-nulth Treaty Society with two reports about juvenile salmon completed for the RBT2 project:               <ul style="list-style-type: none"> <li>Roberts Bank Terminal 2 Follow-up Program: Juvenile Salmon Density Annual Data Report – 2020 by VFPA</li> <li>Technical Data Report: Roberts Bank Terminal 2 Project Marine Fish Juvenile Salmon Surveys by Archipelago Marine Research</li> </ul> </li> </ul>
March 16, 2021	Impact Assessment Studies, VCs, Fish Habitat, Invasive Species	Meeting	<ul style="list-style-type: none"> <li>GCT met with the First Nations of the Maa-nulth Treaty Society to discuss EA studies, both GCT and First Nations of the Maa-nulth Treaty Society’s VC selection, fish habitat and invasive species.</li> </ul>
March 25, 2021	VC Selection	Email	<ul style="list-style-type: none"> <li>GCT requested an update on VC selection, and First Nations of the Maa-nulth Treaty Society indicated they would check the status.</li> </ul>
March 25, 2021	Draft Framework Agreement	Email	<ul style="list-style-type: none"> <li>First Nations of the Maa-nulth Treaty Society provided a draft Framework Agreement for discussion.</li> </ul>

**Table 32: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
April 7, 2021	Draft DPD Feedback Request	Email	<ul style="list-style-type: none"> <li>GCT sent First Nations of the Maa-nulth Treaty Society a copy of the draft DPD and requested feedback by May 7, 2021.</li> <li>GCT asked for a meeting to discuss the DPD, studies that First Nations of the Maa-nulth Treaty Society considers necessary in the review of the Project, and VCs.</li> </ul>
April 7, 2021	Technical Meeting Charts	Email	<ul style="list-style-type: none"> <li>GCT provided charts to First Nations of the Maa-nulth Treaty Society including:               <ul style="list-style-type: none"> <li>Cooperative Planning and Early Engagement Phase chart</li> <li>DP4 Coordinated Assessment Process chart</li> </ul> </li> </ul>
April 8, 2021	DPD, Engagement Process, VC Selection, and Framework Agreement	Meeting	<ul style="list-style-type: none"> <li>GCT met with First Nations of the Maa-nulth Treaty Society to discuss:               <ul style="list-style-type: none"> <li>DPD updates</li> <li>Early engagement processes</li> <li>VC selection</li> <li>Framework Agreement</li> </ul> </li> </ul>
May 10, 2021	Draft Work Plan	Email	<ul style="list-style-type: none"> <li>GCT provided a draft Work Plan, Schedule, and Budget for the Framework Agreement.</li> </ul>
June 2, 2021	Indigenous Knowledge Sharing Agreement	Email	<ul style="list-style-type: none"> <li>GCT sent First Nations of the Maa-nulth Treaty Society the proposed Indigenous Knowledge Sharing Agreement, noting it would be part of the Framework Agreement.</li> </ul>
June 7, 2021	Draft DPD Comments	Email	<ul style="list-style-type: none"> <li>First Nations of the Maa-nulth Treaty Society sent GCT their draft DPD comments, noting more may emerge pending further review by the First Nations of Maa-nulth Treaty Society.</li> </ul>
June 10, 2021	VCs and Indigenous Interests Workshop	Meeting	<ul style="list-style-type: none"> <li>GCT met with First Nations of the Maa-nulth Treaty Society to discuss:               <ul style="list-style-type: none"> <li>Project update</li> <li>Progress and refinement of VC selection</li> <li>Further use of the confidential material which First Nations of the Maa-nulth Treaty Society provided to GCT in March 2021</li> </ul> </li> </ul>

**Table 32: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
(Cont'd.)	(Cont'd.)	(Cont'd.)	<ul style="list-style-type: none"> <li>(Cont'd.) GCT met with First Nations of the Maa-nulth Treaty Society to discuss:               <ul style="list-style-type: none"> <li>First Nations of the Maa-nulth Treaty Society's issues, concerns, and comments following review of the draft DPD</li> </ul> </li> </ul>
June 15, 2021	Indigenous Knowledge Sharing Agreement	Meeting	<ul style="list-style-type: none"> <li>GCT met with the First Nations of the Maa-nulth Treaty Society to discuss coming to a mutually agreed to approach for Indigenous Knowledge sharing.</li> </ul>

During early engagement, the First Nations of the Maa-nulth Treaty Society raised various issues related to the Project. These issues, along with Indigenous Interests raised by the First Nations of the Maa-nulth Treaty Society and the corresponding GCT responses, are summarized in Table 33.

**Table 33: Summary of Indigenous Interests and Issues Raised by the First Nations of the Maa-nulth Treaty Society.**

Indigenous Interests and Issues Raised	GCT Response
Concerns about the increased commercial marine traffic and shipping containers lost at sea.	The Impact Assessment is required to assess issues relating to marine use and marine navigation. GCT will continue to engage with First Nations of the Maa-nulth Treaty Society on this issue during the Project planning and Impact Assessment phase. To facilitate discussion regarding concerns around marine shipping GCT has offered to invite the BC Chamber of Shipping to a future meeting.
Concerns about the cumulative effects of this and other projects using or seeking to use First Nations of the Maa-nulth Treaty Society's Traditional Territories and First Nations of the Maa-nulth Treaty Society's ability to participate meaningfully in the management of those effects. The cumulative effects associated with the project should be thoroughly assessed.	<p>The Impact Assessment is required to assess potential cumulative effects and effects to Indigenous interests from the Project. To assess the cumulative effects on a given VC, the residual effects of the Project will be assessed in combination with the potential effects of other past, present and reasonably foreseeable projects (projects that are either proposed (public disclosure) or have been approved to be built but are not yet built) and activities that overlap with the effects of the Project. The factors to be considered, and the scope of those factors, will be described in the Project Joint Guidelines. The IAAC and BCEAO will consult with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuance of the final Joint Guidelines.</p> <p>While not related to the Project specifically, GCT also informed the First Nations of the Maa-nulth Treaty Society about the SSIGA initiative related to cumulative effects, and provided contact information if they have any interest in collaborating.</p>

**Table 33: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
Effective monitoring throughout the life of the Project. Interest in building or using capacity for Project-related monitoring, reporting and adaptive management.	GCT will continue to engage with First Nations of the Maa-nulth Treaty Society during the Project planning and assessment phase to discuss monitoring plans. GCT will discuss post-construction and operations monitoring with the First Nations of the Maa-nulth Treaty Society as the project proceeds.
Avoidance and mitigation of negative impacts to the greatest extent possible with rehabilitation in areas where harm is caused.	The Impact Assessment is required to assess potential effects on the environment from the Project. GCT will continue to engage with First Nations of the Maa-nulth Treaty Society in an effort to avoid and mitigate adverse effects to the environment during the Project planning and assessment phase.
The Project must not unreasonably interfere with Maa-nulth Treaty Society's traditional practices and their deep connection to the ocean and its resources. Compensation must be provided to Maa-nulth Treaty Society for any adverse Project impacts, including any cultural interference or loss caused as a result of the Project.	GCT will engage with First Nations of the Maa-nulth Treaty Society to avoid potential cultural interference or loss associated with the Project. Where potential interactions occur between the Project and culture, GCT will engage with First Nations of the Maa-nulth Treaty Society to develop and apply appropriate mitigation measures.
Share of wealth generated as a result of the Project, with preferential access to jobs, training and business opportunities.	GCT will continue discussions on Indigenous training, jobs and business opportunities for the construction and operation of the Project. To facilitate that process GCT has entered into discussions with the First Nations of the Maa-nulth Treaty Society on developing a related Framework Agreement to advance discussions related to economic opportunities.
Assessment should be completed to ensure that the Project does not unjustifiably infringe on Aboriginal or Treaty Rights and title, including resource harvesting and other traditional practices.	The Impact Assessment is required to assess the potential effects of the Project on Indigenous Interests. GCT will continue to engage with First Nations of the Maa-nulth Treaty Society to understand their Aboriginal and/or Treaty rights and title within the Impact Assessment process.
Concerns about invasive species being brought into the area from travelling ships. Interest in exploring GCT's role in addressing the gaps in the regulatory regime for invasive species.	GCT acknowledges concerns related to the introduction of invasive species from travelling ships. GCT abides by all regulatory requirements for ships that are berthed at Deltaport but has no ability to direct or influence vessels at sea. GCT encourages the First Nations of the Maa-nulth Treaty Society to communicate its concerns to Transport Canada who regulates activities such as ballast water exchange that could lead to the introduction of invasive species.
Concerns about the overall impact on the ocean and associated marine resources, specifically to species that are important to Maa-nulth Treaty Society including Sockeye salmon, Chinook salmon, Coho salmon, and sea urchins.	The Impact Assessment is required to assess potential Project effects on marine resources, fish, and Indigenous Interests. GCT encourages the First Nations of the Maa-nulth Treaty Society to work with the Government of Canada on their Oceans Protection Plan which is intended to create a "shared approach to better understand coastal ecosystems and the possible effects that ships have on the environment".

**Table 33: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
(Cont'd.)	(Cont'd.) GCT will continue to engage with First Nations of the Maa-nulth Treaty Society on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on First Nations of the Maa-nulth Treaty Society's' Indigenous Interests identified in the draft Joint Guidelines.
Assessment should extend beyond the 12 nautical miles limit to 200 nautical miles. Scoping the assessment to include First Nations of Maa-nulth Treaty Society's territorial waters is necessary to adequately assess impacts of the Project on First Nations of Maa-nulth Treaty Society and to adequately consider the interconnectedness of all things. Having GCT advocate for such a scope is important to First Nations of Maa-nulth Treaty Society's early relationship with GCT. If GCT is indeed agreeable to an expanded scope, this needs to be reflected in regulatory documents.	The spatial scope of the Impact Assessment will be determined by the IAAC and the BCEAO. Notwithstanding this determination, GCT will ask regulators and work with Indigenous nations to determine potential options to assess Project-related marine shipping effects in their traditional territory, which may extend beyond the spatial scope determined by the IAAC and the BCEAO. Such assessment will explore opportunities to partner with regulators and Indigenous nations on potential mitigation options and wider management initiatives.
Concerns about impacts to the Marine Highway which includes the canyons located off the West Coast of Vancouver Island in the continental shelf within Maa-nulth territories.	GCT understands that the marine highway is an important migratory pathway for various marine species and is used traditionally for navigation. GCT will evaluate the potential for Project interactions with these canyons and will engage further with First Nations of Maa-nulth Treaty Society on this issue in upcoming engagement activities.
Concerns that an increase in ship size will result in increased emissions and a larger impact on climate change. GHG emissions beyond 2050 should be included in the calculations.	As per the guidelines for GHG assessment, the assessment is required to calculate total project emissions, however, GHG emissions are also provided on an annual basis in the DPD. The worst case is that these emissions would continue beyond 2050. However, GCT is continuing to explore the potential for achieving net-zero emissions by 2050 and has a history of successful emissions reduction at GCT Deltaport.  GCT is committed to addressing the issue of climate change and reducing and avoiding GHG emissions where possible throughout the advancement of the Project. The Impact Assessment will describe the Project's contribution to best achievable technologies to mitigate GHG emissions and other potential sources of climate change from the Project and address the extent to which the effects of the Project hinder or contribute to BC and Canada's environmental obligations and climate change commitments.

**Table 33: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
(Cont'd.)	(Cont'd.) GCT acknowledges First Nations of Maa-nulth Treaty Society's interest in understanding GHG emissions from marine shipping. Based on regulatory requirements and engagement with Indigenous nations, GCT is drafting Joint Guidelines to define the Project assessment scope. After we provide the draft Joint Guidelines to BC EAO and IAAC, they will consult First Nations of Maa-nulth Treaty Society and determine the final scope.
Ensure that proper protocols are followed to protect First Nations of Maa-nulth Treaty Society's IK.	GCT recognizes the importance of maintaining confidentiality and will respect the protocols that First Nations of the Maa-nulth Treaty Society identifies. GCT and First Nations of the Maa-nulth Treaty Society have agreed to work together to find a mutually agreeable process for sharing IK.
Concerns about Project construction, operation and marine shipping due to the Project and its effects on water quality, fish, birds, aquatic plants, shellfish, marine mammals, wildlife, cultural and heritage sites, safety, economic interests and the health of the ocean and resources.	The Impact Assessment is required to review and evaluate potential Project effects on water quality, fish, vegetation, wildlife, marine resource, marine use and Indigenous Interests for inclusion in the Impact Assessment. GCT will continue to engage with First Nations of Maa-nulth Treaty Society on these issues during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on First Nations of the Maa-nulth Treaty Society's Indigenous Interests identified in the draft Joint Guidelines. To facilitate discussion regarding concerns around marine shipping, GCT has offered to invite the BC Chamber of Shipping to a future meeting.
Concerns about the impacts of accidents and malfunctions, including concerns related to contamination from containers being lost at sea and washing up on the shore in First Nations of Maa-nulth Treaty Society territory, on water quality, fish, birds, shellfish, marine mammals, aquatic plants, wildlife, cultural and heritage sites, safety, the health of the ocean and resources, the physical and mental health of Maa-nulth Treaty Society members, the land, and economic interests.	The Impact Assessment is required to assess the potential for malfunctions and accidents, the potential Project environmental effects including effects on marine use, wildlife, vegetation, fish, marine resource, human health and indigenous interests. GCT is planning a risk-based approach for the assessment of malfunctions and accidents that could impact VCs and Indigenous interests identified for the Project. This may include assessment of the consequence of incidents and consider potential environmental, economic, social, cultural and health effects and effects to Indigenous interests. GCT will continue to engage with First Nations of Maa-nulth Treaty Society on this issue during the project planning and assessment phase.
Concerns about emergency preparedness and response and the need for sufficient government, organization, and volunteer capacity to respond to an accident or malfunction at the project site or with a container ship.	The Impact Assessment is required to assess the risk and response for malfunctions and accidents. GCT will continue to engage with First Nations of Maa-nulth Treaty Society on this issue during the Project planning and assessment phase.

**Table 33: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>Concerns about the accuracy of market projections and how alternatives to the Project have been and will be assessed.</p>	<p>GCT has engaged with First Nations of Maa-nulth Treaty Society about the shipping container market and the assessment of Project alternatives. GCT has provided First Nations of Maa-nulth Treaty Society with a copy of the study that examines the levels of cargo that are destined for the USA vs. Canada: <i>Analysis of Capacity Options on the West Coast of Canada</i> by Black Quay (<a href="#">Report on Capacity options for West Coast Canada V6.docx (ceaa-acee.gc.ca)</a>).</p>
<p>Concerns about the short sea shipping assessment and the economic viability, especially with the Nanaimo Dubai World Ports expansion. The assessment lacks clarity of the terms in which the short sea shipping berth is being assessed/ approved. If construction or operation of the berth is materially different than estimated or there are unanticipated impacts from short sea shipping, the Project conditions must trigger additional consultation with First Nations of Maa-nulth Treaty Society and other impacted Indigenous groups.</p>	<p>GCT is pursuing a Project design that accommodates a short sea shipping berth in anticipation that governments may mandate alternatives to trucking in the future, or dynamics in the market may change. To GCT's knowledge, only two examples of short sea shipping exist in the region, and no other short sea shipping services are currently being planned outside of GCT Deltaport. Before pursuing this, GCT will be assessing the viability of this option. As such, it is not possible at this stage to ascertain if, when or where such facilities outside of GCT Deltaport would be constructed. It is similarly not feasible to make predictions about the volumes of marine traffic associated with short sea shipping, or shipping routes, which are not clearly defined unlike shipping routes for traditional container vessels (which GCT will be assessing, along with potential impacts associated with the construction of the short sea shipping berth).</p>
<p>Concerns about disposing dredged material at sea. If proposed, the First Nations of Maa-nulth Treaty Society seek further engagement on the location and impacts.</p>	<p>GCT understands the requirements for a waste prevention audit and assessment of alternatives for Disposal at Sea under the Canadian Environmental Protection Act and as highlighted in the DPD, alternatives will be assessed with a view to avoiding or minimizing Disposal at Sea within the Impact Assessment. If Disposal at Sea is required, it will be assessed within the Impact Assessment and GCT commits to further engagement with the First Nations of the Maa-nulth Treaty Society on the potential locations for and impacts of Disposal at Sea.</p>
<p>Concerns and questions about where construction material will be sourced, how many vessels will be transporting construction material, if any hazardous materials will be transported and what precautions will be taken to ensure the hazardous materials are not released into the environment.</p>	<p>A majority of the construction materials used to develop the expanded landfill for the project consists of dredgeate sourced from within the disturbance area of the project footprint and fill generated from the Fraser River annual maintenance dredge program. Specifications for handling dredgeate, fill, and the remaining finishing materials for the Project will be developed during detailed design. Alternative logistics for sourcing and transporting these finishing materials will be assessed during the Impact Assessment.</p>



**Table 33: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>Concerns about GCT’s statement that marine shipping impacts are “beyond GCT’s care and control”. GCT can ensure these and other marine shipping-related measures are implemented through contractual relationships with the shipping industry and terminal acceptance standards.</p>	<p>GCT acknowledges First Nations of Maa-nulth Treaty Society’s concerns related to marine shipping impacts. GCT will engage with First Nations of Maa-nulth Treaty Society to better understand which marine shipping impacts First Nations of Maa-nulth Treaty Society want to have addressed and examine what could potentially be included in contracts. The VFPA, which has regulatory powers, is already implementing marine shipping related initiatives including the ECHO Program and Blue Circle Awards.</p>
<p>Concern about the trustworthiness of studies used by GCT that support the claim that there is no appreciable sediment contamination within Roberts Bank area due to industrialization. First Nations of Maa-nulth Treaty Society would like GCT to walk them through the studies that support this claim and suggest any proposed mitigation measures relating to sediment contamination.</p>	<p>GCT acknowledges First Nations of Maa-nulth Treaty Society’s concern about sediment contamination. The statements in the DPD are based on previous studies and only provide the setting for the Project at this early stage. GCT is planning additional studies and to consider sediment quality within the Impact Assessment. Based on regulatory requirements and engagement with Indigenous nations, GCT is drafting Joint Guidelines to define the Project assessment scope, including in relation to potential sediment contamination. After GCT provides the draft Joint Guidelines to BC EAO and IAAC, they will consult with Indigenous Nations and determine the final scope. GCT looks forward to further engagement with the First Nations of Maa-nulth Treaty Society on this issue.</p>
<p>Concerns that the Project impacts to the environment and resources within First Nations of Maa-nulth Treaty Society territories impacts culture as a whole. Cultural impacts should be broadened from impacts to cultural sites, objects and activities.</p>	<p>Sections 7.2-7.7 of the DPD broadly discuss the different aspects of impacts that were used to inform potential Valued Components, and the preliminary lists of Indigenous Interests is provided in Section 7.8 based on input from Indigenous Nations. Specific interests of the First Nations of the Maa-nulth Treaty Society will be further detailed in the First Nations of the Maa-nulth Treaty Society portion of the draft Joint Guidelines.</p>
<p>Concerns that the First Nations of Maa-nulth Treaty Society’s rights in relation to other species, beyond crabs, are not adequately considered and assessed.</p>	<p>Sections 7.2-7.7 of the DPD broadly discuss the different aspects of impacts that were used to inform potential Valued Components, and the preliminary list of Indigenous Interests is provided in Section 7.8 based on input from Indigenous Nations. Specific interests of the First Nations of the Maa-nulth Treaty Society will be further detailed in the First Nations of the Maa-nulth Treaty Society portion of the draft Joint Guidelines.</p>
<p>Concerns about the adequacy of the assessment of First Nations of the Maa-nulth Treaty Society members health and well-being, including the consideration of health impacts due to the inability to harvest for cultural and traditional practices. Interested in broadening the scope of the health assessment to include the above consideration.</p>	<p>The Impact Assessment is required to assess potential Project impacts on human health and Indigenous Interests, including traditional use activities. GCT will continue to engage with the First Nations of the Maa-nulth Treaty Society on this issue during the Project planning and assessment phase including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on First Nations of the Maa-nulth Treaty Society’s Indigenous Interests identified in the draft Joint Guidelines.</p>

**Table 33: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>Mitigation measures should be put in place to minimize the risk of a vessel capsizing, grounding or colliding with another vessel due to an earthquake and resulting tsunami.</p>	<p>GCT acknowledges First Nations of the Maa-nulth Treaty Society’s request to implement mitigation for earthquake and tsunami risk on vessels, although GCT does not own or operate vessels. The effects of the environment on the Project will be assessed in the Impact Assessment and mitigation measures will be described. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines and will be confirmed through additional engagement with Indigenous nations, stakeholders, the public, federal and provincial regulators.</p>
<p>Ensuring First Nations of the Maa-nulth Treaty Society’s sacred principles are adhered to should be recognized as an interest in this process.</p>	<p>GCT recognizes the importance of adhering to the sacred principles of the First Nations of the Maa-nulth Treaty Society. GCT will continue to work with the First Nations of the Maa-nulth Treaty Society to further its understanding of the protocols and how best to adhere to them throughout the Project planning and assessment phase.</p>
<p>Concerns about marine shipping noise on SRKW, juvenile fish and ocean fauna species. Request that underwater acoustic equipment be turned down or off to reduce underwater noise around the terminal.</p>	<p>GCT appreciates the Maa-nulth Treaty Society’s concern regarding underwater noise from marine shipping. GCT understands that the primary source of underwater noise from shipping is from the propellers. Underwater noise generated at the terminal will be considered in the assessment and mitigations implemented to minimize underwater noise.</p>
<p>Concerns about the lack of consideration of causeway breaching as a potential design measure to mitigate effects on juvenile salmon.</p>	<p>GCT appreciates the potential benefits of breaching the causeway and is supportive of the concept. GCT notes that the design of DP4 within the inter-causeway area does not increase the barrier effect. The causeway is beyond GCT’s care and control and therefore a plan to breach the causeway would have to be developed with others. GCT looks forward to continued engagement on design and mitigation.</p>
<p>Concerns about the segregation of the VCs and the ability for the Impact Assessment to adequately reflect the interconnectedness of the VCs and of the Maa’nulth First Nations values (e.g., Hišuk ma cáwak where “Maa-nulth cannot separate the physical, social, cultural, and economic values from one another, as they are all connected.”).</p>	<p>GCT acknowledges First Nations of the Maa-nulth Treaty Society’s concern about the segregation of Valued Components to be assessed. GCT is actively trying to address this by weaving the parts into themes and showing the interdependencies and cross-linkages. One of the themes is the Ecosystem approach, from the 1992 UN Convention on Biological Diversity. This approach ties things together in an interdisciplinary manner and includes humans as a part of the ecosystems. GCT will continue to engage and collaborate with the First Nations of the Maa-nulth Treaty Society on how to best assess the impacts on an interconnected system.</p>
<p>Concerns about the increased risk of spills and the subsequent effects on sea urchins and sea urchin harvesting.</p>	<p>The Impact Assessment is required to assess the potential for malfunctions and accidents, the potential Project impacts on wildlife and marine resource. GCT will continue to engage with the First Nations of the Maa-nulth Treaty Society on these issues during the Project planning and assessment phase.</p>

**Table 33: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
(Cont'd.)	GCT is planning a risk-based approach for the assessment of malfunctions and accidents that could impact VCs and Indigenous Interests identified for the Project. This could include assessment of the consequence of each incident and consider potential environmental, economic, social, cultural and health effects and effects to Indigenous Interests. GCT will continue to engage with the First Nations of the Maa-nulth Treaty Society on this issue during the Project planning and assessment phase.

### 8.4.5 Halalt First Nation

This section describes GCT’s engagement with Halalt First Nation during the Early Engagement Phase, and includes information regarding their notice to engage as a PIN. Detailed records of engagement activities, key interests and issues raised by Halalt First Nation are provided in Table 34 and Table 35.

GCT has engaged with Halalt First Nation by email, letter, phone calls, and virtual meetings. GCT has asked Halalt First Nation to specify their preferred methods of engagement. As engagement progresses, GCT is prepared to modify the methods of engagement should that be requested by Halalt First Nation. In the meantime, GCT will continue to engage Halalt First Nation through various methods.

GCT initiated engagement with Halalt First Nation via an introductory letter on February 25, 2020. GCT met with the Cowichan Nation communities of Cowichan Tribes, Halalt First Nation, Lyackson First Nation, and Stz’uminus First Nation on November 19, 2020, to discuss engagement. GCT and Halalt First Nation signed a Capacity Funding Agreement on December 7, 2020. GCT met with Cowichan Tribes, Halalt First Nation, and Lyackson First Nation between April and June 2021 to discuss capacity funding, updates to the draft DPD, VCs, the Joint Guidelines and Cowichan Tribes’ Indigenous Interests.

Halalt First Nation submitted its notice to engage as a PIN to the BCEAO on December 7, 2020. In their notice, Halalt First Nation stated that along with their fellow Cowichan Nation communities (Cowichan Tribes, Lyackson First Nation, Penelakut Tribe, and Stz’uminus First Nation), Halalt First Nation asserts and maintains their right to fish and harvest within the Project area. An initial funding agreement with Halalt First Nation was signed and executed on December 7, 2020.

**Table 34: Summary of Key Engagement with Halalt First Nation.**

Dates	Subject	Interaction Type	Summary of Engagement
February 25, 2020	Project Introduction	Email	<ul style="list-style-type: none"> <li>GCT informed Halalt First Nation about the Project and requested input on the IPD and about Halalt First Nation’s engagement and participation preferences.</li> </ul>
February 28, 2020	Introduction	Phone Call	<ul style="list-style-type: none"> <li>GCT provided Project information and requested a meeting.</li> </ul>

**Table 34: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
March 17, 2020	Introduction	In-person	<ul style="list-style-type: none"> <li>GCT visited the Halalt First Nation office and left a presentation about the Project with Halalt First Nation staff.</li> </ul>
April 8, 2020	Follow-Up	Email	<ul style="list-style-type: none"> <li>GCT emailed Halalt First Nation an electronic copy of the presentation about the Project and inquired to have a call to discuss the Project.</li> </ul>
April 7, 2021	Draft DPD Feedback Request	Email	<ul style="list-style-type: none"> <li>GCT sent Halalt First Nation a copy of the draft DPD and requested feedback by May 7, 2021.</li> <li>GCT asked for a meeting to discuss the DPD, studies that Halalt First Nation considers necessary in the review of the Project, and VCs.</li> </ul>
July 29, 2020	Presentation	Video Call	<ul style="list-style-type: none"> <li>GCT met with Cowichan Tribes, Halalt First Nation, Lyackson First Nation, Penelakut, Tribe and Stz'uminus First Nation to provide a presentation on the Project and discuss questions and concerns about the Project.</li> </ul>
August 4, 2020	Engagement Plan	Email	<ul style="list-style-type: none"> <li>GCT emailed Halalt First Nation to:               <ul style="list-style-type: none"> <li>Inform them that the Project was entering the Early Engagement and Planning phase of project development.</li> <li>Request information about engagement protocols and communication preferences.</li> <li>Identify activities that can be included in capacity funding.</li> </ul> </li> </ul>
September 29, 2020	IPD	Email	<ul style="list-style-type: none"> <li>GCT provided an update on regulator approval of IPD.</li> </ul>
September 29, 2020	Capacity Funding, Transport Canada Underwater Noise Funding	Email	<ul style="list-style-type: none"> <li>GCT provided information on near-term capacity funding and Transport Canada's Underwater Noise Reduction Initiative.</li> </ul>
October 15, 2020	Comment Period	Email	<ul style="list-style-type: none"> <li>GCT informed Halalt First Nation about the comment period for IAAC.</li> </ul>
November 2, 2020	Virtual Open House	Email	<ul style="list-style-type: none"> <li>GCT emailed Halalt First Nation a reminder of the virtual open house.</li> </ul>
November 19, 2020	Virtual Open House	Email	<ul style="list-style-type: none"> <li>GCT provided Halalt First Nation with a copy of the presentation given at the virtual open house.</li> </ul>

**Table 34: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
November 19, 2020	Impact Assessment	Meeting	<ul style="list-style-type: none"> <li>Meeting with Cowichan Tribes, Halalt First Nation, Lyackson First Nation and Stz'uminus First Nation to discuss capacity funding and MOUs which address the assessment process.</li> </ul>
December 7, 2020	Capacity Funding	Email	<ul style="list-style-type: none"> <li>GCT emailed an executed copy of the Capacity Funding Agreement to Halalt First Nation.</li> </ul>
December 10, 2020	IPD Comments	Email	<ul style="list-style-type: none"> <li>Cowichan Tribes, Halalt First Nation, Lyackson First Nation, Penelakut First Nation, and Stz'uminus First Nation submitted their comments on the IPD to the BC EAO.</li> </ul>
January 28, 2021	IPD Comments	Meeting	<ul style="list-style-type: none"> <li>GCT met with Cowichan Tribes, Halalt First Nation, Lyackson First Nation, Penelakut First Nation and Stz'uminus First Nation to discuss:               <ul style="list-style-type: none"> <li>○ Past studies</li> <li>○ Project timeline</li> <li>○ Addressing comments in the DPD</li> </ul> </li> </ul>
January 29, 2021	IAAC Funding	Email	<ul style="list-style-type: none"> <li>GCT provided Information on Capacity Funding from IAAC to Halalt First Nation.</li> </ul>
January 29, 2021	JSOIE	Email	<ul style="list-style-type: none"> <li>GCT sent Halalt First Nation the final JSOIE.</li> </ul>
February 10, 2021	Project Schedule	Email	<ul style="list-style-type: none"> <li>GCT provided a detailed Project schedule for Halalt First Nation's review of the DPD and Joint Guidelines.</li> </ul>
April 7, 2021	Draft DPD Feedback Request	Email	<ul style="list-style-type: none"> <li>GCT sent Halalt First Nation a copy of the draft DPD and requested feedback by May 7, 2021.</li> <li>GCT asked for a meeting to discuss the DPD, studies that Halalt First Nation considers necessary in the review of the Project, and VCs.</li> </ul>
April 13, 2021	Draft DPD Follow up	Email	<ul style="list-style-type: none"> <li>GCT emailed Halalt First Nation confirming receipt of the DPD and requesting that they provide feedback on the draft DPD by May 7, 2021, and to schedule a meeting.</li> </ul>

**Table 34: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
May 6, 2021	Draft DPD Feedback Extension	Email	<ul style="list-style-type: none"> <li>Halalt First Nation requested an update on additional capacity funding, draft DPD, and Tsawwassen First Nation marina access.</li> <li>Halalt First Nation requested additional time to review the draft DPD.</li> </ul>
May 6, 2021	Feedback Extension and Capacity Funding	Email	<ul style="list-style-type: none"> <li>GCT inquired whether additional capacity funding was required at this time and the purpose of the funding.</li> <li>GCT provided updates on DPD changes.</li> <li>GCT agreed to an extension for DPD feedback.</li> </ul>
May 7, 2021	Workshop Invitation	Email	<ul style="list-style-type: none"> <li>GCT invited Halalt First Nation to an upcoming DPD workshop and provided a summary of upcoming Project activities.</li> </ul>
May 11, 2021	DPD Updates	Email	<ul style="list-style-type: none"> <li>GCT provided an updated draft of DPD Chapter 8, which included content that Halalt First Nation had requested be included on April 29. GCT requested feedback on the updates.</li> </ul>
May 14, 2021	Meeting Availability	Email	<ul style="list-style-type: none"> <li>GCT requested Halalt First Nation provide availability for a meeting within the proposed dates.</li> </ul>
May 18, 2021	Workshop Request	Phone Call	<ul style="list-style-type: none"> <li>GCT phoned Halalt First Nation to request a workshop on Indigenous Interests, and Halalt First Nation was not available to answer the call.</li> </ul>
May 19, 2021	Indigenous Interests Workshop Agenda	Indigenous Interests Workshop Agenda	<ul style="list-style-type: none"> <li>GCT proposed an agenda for the Indigenous Interests workshop which included discussing Indigenous Interests and VCs.</li> </ul>
June 4, 2021	Draft DPD Comments	Email	<ul style="list-style-type: none"> <li>Halalt First Nation sent GCT their comments on the draft DPD.</li> </ul>

**Table 34: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
June 15, 2021	VCs and Indigenous Interests Workshop	Meeting	<ul style="list-style-type: none"> <li>• GCT met with Cowichan Tribes, Halalt First Nation, Penelakut Tribe, and Lyackson First Nation to discuss:               <ul style="list-style-type: none"> <li>○ Project update</li> <li>○ Progress and refinement of VC selection</li> <li>○ Preliminary understanding of CNA’s Indigenous Interests potential project effects</li> </ul> </li> <li>• CNA identified issues and concerns and GCT responses to CNA comments on the revised DPD.</li> </ul>

During early engagement, Halalt First Nation raised various issues related to the Project. These issues, along with Indigenous Interests raised by Halalt First Nation and the corresponding GCT responses, are summarized in Table 35.

**Table 35: Summary of Indigenous Interests and Issues Raised by Halalt First Nation.**

Indigenous Interests and Issues Raised	GCT Response
Significant concerns about the cumulative effects of increased shipping and the subsequent effects on fishing and harvesting activities	The Impact Assessment is required to assess potential Project cumulative environmental impacts, as well as impacts to Indigenous Interests. GCT will continue to engage with Halalt First Nation on these issues during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Halalt First Nations’ Indigenous Interests identified in the draft Joint Guidelines.
Use of area for FSC purposes and economic opportunities including Aboriginal Communal Fishing Licenses.	The Impact Assessment is required to assess the potential Project impacts on Indigenous Interests. GCT will continue to engage with Halalt First Nation on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Halalt First Nations’ Indigenous Interests identified in the draft Joint Guidelines. While not related to the Project specifically, GCT also informed Halalt Nation about the SSIGA initiative related to the cumulative effects, and provided contact information if they have any interest in exploring collaboration potential.
Recognition of all other Indigenous rights and title in the area, including Aboriginal title and the right to fish and harvest at the TI’uqtinus village site on the South Arm of the Fraser River.	The Impact Assessment is required to assess potential impacts of the Project on Indigenous Interests and rights. GCT will continue to engage with Halalt First Nation on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Halalt First Nations’ Indigenous Interests identified in the draft Joint Guidelines.

**Table 35: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
Principles of UNDRIP and of FPIC should be reflected in the document.	The Federal and Provincial governments have taken various steps to incorporate UNDRIP principles into the new Impact Assessment. GCT will be following this process during the Project planning and assessment phase.
Questions about initial habitat inventory, cumulative impact assessment and pasts studies around sediment, coal dust, disposal at sea, eelgrass, intertidal marsh mapping, water quality, noise, and fish habitat offsetting.	GCT's technical personnel will engage with Halalt First Nation to identify specific areas where gaps exist, and where further information and studies are required. Furthermore, a secondary source list will be provided to Halalt First Nation for validation purposes on topic areas relating to Indigenous Interests.
Concerns and questions about mitigation and offsetting measures for fish/fish habitat, WMA, migratory birds, shellfish, marine flora, water quality, SRKW, scour protection, dust control during construction and spill response.	GCT is committed to meaningful engagement for proposed mitigation and offsetting measures as the Impact Assessment progresses and looks forward to engaging with Halalt First Nation to address specific questions and concerns regarding mitigation and offsetting measures during construction and spill response.
Concerns about the efficacy and efficiency of the Oceans Protection Plan and the impacts of Short Sea Shipping, including its impacts on fish, fish habitat and fishing rights in the Fraser River and its interference with the ability of Halalt First Nation to exercise harvesting rights in the area. The cumulative impacts of Short Sea Shipping must be considered in the context of multiple proposed projects in the South Arm area.	The Impact Assessment is required to assess marine use, and marine navigation, the environment and Indigenous Interests and rights. GCT appreciates the importance of the Fraser River and supports the concept of re-establishing something similar to the FREMP by the relevant governments and agencies. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines for the Project and will be confirmed through additional engagement with Indigenous nations, stakeholders, the public, federal and provincial regulators. GCT will continue to engage with Halalt First Nation on this concern during the Project planning and assessment phase.
Inclusion of communities in environmental and heritage monitoring.	GCT will continue to engage with Halalt First Nation during the Project planning and assessment phase about opportunities for them to be included in future environmental and heritage monitoring plans.
Request for job opportunities and need for accommodations for workers from outside Metro Vancouver, and for GCT to provide information and assistance to Indigenous individuals who are interested in operational employment.	GCT is committed to providing information and assistance to Halalt First Nation members who are interested in operational employment and facilitating engagement with the BC Maritime Employers Association. GCT will engage with Halalt First Nation about possible job opportunities and accommodation options during the Project planning and assessment phase of the Project.
Concerns about effects on fisheries, migratory birds, the endangered SRKW, marine fauna and flora.	The Impact Assessment is required to assess potential impacts on the environment from the Project. GCT will continue to engage with Halalt First Nation on these issues during the Project planning and assessment phase.



**Table 35: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>Concerns about effects to safe and culturally appropriate access to resources including FSC fisheries, and vessel traffic impacts.</p>	<p>The Impact Assessment is required to assess potential Project impacts to marine use, marine navigation and Indigenous Interests. GCT will continue to engage with Halalt First Nation on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Halalt First Nations' Indigenous Interests identified in the draft Joint Guidelines.</p>
<p>Concerns about the impacts of rock fill, pile driving, dredging material and road watering on water quality, water clarity, habitat, foraging, eelgrass beds and critical habitat processes like nutrient transfer.</p>	<p>The Impact Assessment is required to assess potential Project impacts on Indigenous Interests and the environment. GCT will continue to engage with Halalt First Nation on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Halalt First Nations' Indigenous Interests identified in the draft Joint Guidelines.</p>
<p>Important to effectively monitor water quality, water clarity, light, and noise levels during construction, throughout all phases of the Project, and beyond.</p>	<p>The Impact Assessment is required to assess the potential Project environmental impacts. GCT will continue to engage with Halalt First Nation on these issues during the Project planning and assessment phase.</p>
<p>Concerns and questions about effective collaboration, input during construction window, and time allotment for Halalt First Nation review of developments and mitigation measures.</p>	<p>GCT will continue discussions with Halalt First Nation on how to consult and collaborate in a respectful and meaningful way.</p>
<p>Concerns about using current accommodations and programs (i.e., TMX accommodations) to ensure a favourable Impact Assessment. Those programs are meant to be specific to the TMX pipeline and should not be relied on in other projects, only referenced as additional measures occurring in/adjacent to the Project area.</p>	<p>Project-specific mitigations will be required for the Project. GCT will continue to engage with Halalt First Nation on this issue during upcoming engagement activities. GCT commits to ongoing engagement with Halalt First Nation to identify gaps of information and accommodation programs that would be specific to the Project.</p>
<p>Concerns that GCT has not outlined any commitments to work with our communities as to what specific benefits would best support our diverse needs and interests. Specifically in regard to the impacts a project of this magnitude would produce.</p>	<p>GCT has signed a Capacity Funding Agreement with Halalt First Nation that provides for the development of a Memorandum of Understanding (MOU) that could lead to mutual benefit agreements with the Halalt First Nation.</p>

**Table 35: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>Concern with GCT’s approach that appears to privilege Treaty Rights over Aboriginal Rights. Despite documented strong fishing rights proximal to the Project area and the use of multiple Fishing Areas for Food, Social and Ceremonial quotas directly adjacent to the Project, Halalt First Nation has not been provided with the opportunity to work in collaboration on marine harvesting access in the Project area. This has been raised on three occasions and GCT has failed to provide a satisfactory response. Halalt First Nation seeks the same opportunities, funding, support, and benefits as afforded to other communities with rights in the Project area, including, amongst others, the opportunity for a new vessel marina and boat launch to support harvesting.</p>	<p>GCT will continue to engage with Halalt First Nation to get a better understanding of the number and size of vessels for which they are looking to have access in the area. GCT is committed to proposing relevant solutions.</p>
<p>Concerns about increase in vessel traffic and increase size of vessels. Request that the impacts of larger vessels be fully considered in the assessment and expect GCT to commit to a maximum number of vessels per annum and base their impact assessment on this maximum number of vessels.</p>	<p>GCT plans to assess larger vessels and the maximum number of vessels that are expected to call at GCT. Container vessels call at GCT Deltaport on a fixed schedule and through many years of operating GCT Deltaport, there is an excellent understanding of the shipping lines. GCT has also commissioned independent studies of expected vessel calls (size and frequency) in the future, as described in the DPD.</p>
<p>Concerns about the lack of information provided to Halalt First Nation about the Salish Sea Indigenous Guardians Association.</p>	<p>In 2020, GCT provided financial support for the Indigenous-led initiative, known as the SSIGA. While GCT is not involved in the ongoing operations of the SSIGA having heard of this concern GCT followed up and now understands that SSIGA and Halalt First Nation representatives were in contact regarding an Indigenous-led cumulative effects initiative in October of 2020.</p>
<p>Concerns about the fragile state of salmon. Request that GCT include a discussion about the currently deteriorating state of the Fraser River salmon run. Given the poor health of this run and the subsequent impacts to Halalt First Nation community’s Food, Social, and Ceremonial quota, Halalt First Nation has incredibly low risk tolerance for Project impacts that could further deteriorate the state of the Fraser River salmon run, its ability to provide needed subsistence and cultural resources for Indigenous communities, and the ability to exercise the Indigenous right to fish.</p>	<p>GCT acknowledges Halalt First Nation concerns regarding salmon. Potential impacts on salmon are acknowledged in the DPD, will be discussed in the Joint Guidelines that will describe the assessment methodology and will be a key part of the Impact Assessment. We appreciate the importance of the states of the Fraser River salmon runs to the biological setting and have added such a statement to Section 6.3 of the DPD, as requested.</p>

**Table 35: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
Halalt First Nation is unsatisfied with all the responses provided by GCT to date. Halalt First Nation requires deeper engagement and meaningful responses to the concerns raised than has been provided by GCT thus far.	GCT acknowledges Halalt First Nation’s Indigenous Rights. GCT acknowledges that there are unresolved concerns at this early stage, and GCT will continue to engage with Halalt First Nation on this issue during the Project planning and assessment phase. This will include discussions around the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8, and list of potential effects on Halalt First Nation Indigenous Interests identified in the draft Joint Guidelines.
Concerns that GCT is using the lower number of transit from the estimate rather than the higher number to base the assessment off of. Request that GCT base its assessment on the maximum number of transits.	GCT will use the maximum number of transits (1560 transits) in the assessment of effects. GCT will continue to engage with Halalt First Nation on this issue during the Project planning and assessment phase.

Table 36 summarizes issues and concerns raised by Halalt First Nation in relation DP4 project. At the request of the Halalt First Nation in order to support their review of the DPD, the table also includes issues raised in response to another proposed project in the Roberts Bank area, and which GCT understands may also be applicable to the Project.

**Table 36 Summary of Indigenous Interests and Issues Raised by Halalt First Nation Which May Also Be Applicable to the Project.**

Indigenous Interests and Issues Raised	GCT Response
Concerns about the increased vessel traffic due to the Project and its effects on Halalt First Nation hunting, fishing and harvesting grounds. This includes the disruption to migratory fish pathways (i.e., salmon) and birds dependent upon the river system in perpetuity.	The Impact Assessment is required to assess potential Project impacts on marine resources, fish, wildlife and Indigenous Interests. GCT will continue to engage with Halalt First Nation on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section, 7.8 and list of potential effects on Halalt First Nations’ Indigenous Interests identified in the draft Joint Guidelines.
Concerns about the Project-specific and cumulative impact of the erosion of intertidal and foreshore areas from vessel wake and the subsequent impacts on critical foreshore and intertidal habitats that support Halalt First Nation community through resources.	Alterations to coastal geomorphology will be considered in the assessment. This may include vessel wake. Alterations in coastal geomorphology may inform the effect pathway for the assessment of effects to VCs, such as, but not limited to, Fish and Fish Habitat and Archaeology. GCT will continue to engage with Halalt First Nation on this issue during the Project planning and assessment phase.
Concerns that the assessment of vessel wake should address wave period, cumulative effects, and shoreline topography, all of which are critical factors in assessing the potential erosion impacts of vessel wake.	The assessment of potential effects on coastal geomorphology may include an assessment of the effects of vessel wakes. The assessment could be focused on the maneuvering of vessels in the vicinity of the Project and consider the potential wake effects from ship traffic in the shipping corridors. GCT will continue to engage with Halalt First Nation on this issue during the Project planning and assessment phase.

**Table 36: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>Concern that the proposed Project area is within the area of Halalt First Nation’s communal fishing license for conducting fishing for FSC purposes.</p>	<p>The Impact Assessment is required to assess potential Project impacts on marine use and Indigenous Interests. GCT will continue to engage with Halalt First Nation on this issue during the Project planning and assessment phase, including how the preliminary list of potential effects on Indigenous Interests identified in the Joint Guidelines can incorporate Halalt First Nation’s communal fishing license for conducting fishing for FSC purposes.</p>
<p>Concerns about the project imposing further damage to intertidal resources which will impact Halalt First Nation’s quantity and quality of marine harvest.</p>	<p>The Impact Assessment is required to assess potential Project impacts on Indigenous Interests. GCT will continue to engage with Halalt First Nation on this issue during Project planning and assessment phase, including how the preliminary list of potential effects on Indigenous Interests identified in the Joint Guidelines can incorporate Halalt First Nation marine harvest of intertidal resources.</p>
<p>Concerns about Project-related shipping effects on the reefs at Tumbo Island, as these reefs are of particular importance for fishing and for refuge.</p>	<p>The Impact Assessment will include an assessment of the vessels travelling in the shipping channels, including the ship traffic corridors near Tumbo Island. GCT will continue to engage with Halalt First Nation on this issue during the Project planning and assessment phase.</p>
<p>Concerns about Project effects on waterfront areas, as waterfront areas are areas of high archaeological potential, with burials being unearthed on shorelines due to erosion. This further alienates Indigenous nations from their cultural places.</p>	<p>The Impact Assessment is required to assess potential Project impacts on physical and cultural heritage. GCT will continue to engage with Halalt First Nation on this issue during Project planning and assessment phase, including on how the preliminary list of potential effects on Indigenous Interests identified in the Joint Guidelines can incorporate effects on areas of high archaeological potential and use of cultural places.</p>
<p>Concerns about the threat of this Project on biofilm and the subsequent effects on shore birds including the Western Sandpiper.</p>	<p>Biofilm will be considered in the assessment of potential Project effects including as a pathway to potential effects to shore birds including the Western Sandpiper.</p> <p>The presence of biofilm in proximity to the Project is understood to be limited in comparison to the RBT2 project footprint. GCT plans to complete field surveys to better understand existing biofilm conditions and potential Project effects. GCT will continue to engage with Halalt First Nation on this issue during the Project planning and assessment phase.</p>
<p>Concerns about invasive species being brought into the area by Project vessels and the inadequacy of the current invasive species inspection system. Invasive species brought into the area negatively affects native ecosystems, which subsequently leads to further loss of access and opportunities that are integral to Indigenous rights and how they are exercised.</p>	<p>GCT acknowledges Halalt First Nations concerns related to the introduction of invasive species and the current inspection system administered under Canadian legislation. GCT abides by all regulatory requirements for ships that are berthed at Deltaport but has no ability to direct or influence vessels at sea. GCT encourages Halalt First Nation to communicate its concerns to Transport Canada who regulates activities such as ballast water exchange that could lead to the introduction of invasive species.</p>

**Table 36: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>Concerns related to accidents and malfunctions:</p> <ul style="list-style-type: none"> <li>Concerns about the potential for spills in the Salish Sea and the subsequent effects to Halalt First Nation way of life and Aboriginal rights.</li> <li>Concerns and questions about container vessel casualty measures including emergency tub rescue, salvage capabilities, planning and collaborating on places of refuge, sea conditions and response gaps and worst-case vessel causality assessments.</li> <li>Concerns and questions about spill response to heavy bunker fuel oil including the fate of heavy bunker oils if spilled and extra measures to manage stranded and weathered bunker oil.</li> <li>Concerns and questions about shoreline cleanup measures, workforce and logistics for bunker oil and container-debris, shoreline response to Hazardous Noxious Substances (HNS), waste management of oily wastes, and container vessel loss exercises and planning.</li> </ul>	<p>The Impact Assessment is required to assess the potential for malfunctions and accidents, the potential Project environmental impacts and impacts to marine use, Cultural Continuation, impacts to Aboriginal rights and title, and emergency preparedness and response. GCT will continue to engage with Halalt First Nation on these issues during the Project planning and assessment phase.</p> <p>GCT is planning a risk-based approach for the assessment of malfunctions and accidents that could impact VCs and Indigenous interests identified for the Project. This could include assessment of the consequence of each incident and consider potential environmental, economic, social, cultural and health effects and effects to Indigenous interests. GCT will continue to engage with Halalt First Nation on this issue during the Project planning and assessment phase.</p>
<p>Concerns about potential gaps in the assessment methodology including the project-related marine shipping geographic scope of 12 nautical mile limit.</p>	<p>The spatial scope of the Impact Assessment will be determined by the IAAC and the BCEAO. Notwithstanding this determination, GCT will work with Indigenous nations to determine potential options to assess Project-related marine shipping impacts in their traditional territory, which may extend beyond the spatial scope determined by the IAAC and the BCEAO. Such assessment will explore opportunities to partner with regulators and Indigenous nations on potential mitigation options and wider management initiatives.</p>

**Table 36: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>Concerns about the comprehensiveness of the cumulative effects assessment. Halalt First Nation recommends that:</p> <ul style="list-style-type: none"> <li>• The Impact Assessment should consider all the impacts on the Salish Sea, including contamination from point and diffuse land-based sources, the multiple impacts on salmon and other fish stocks, and the impacts from all vessel traffic;</li> <li>• Proper co-development of “short-, medium-, and long-term targets for addressing cumulative effects, including consideration of the feasibility of reducing total underwater noise, strike/collision risk of vessels with marine species, and key contaminant levels over time.”</li> </ul>	<p>The Impact Assessment will require the assessment of cumulative impacts from past, present, and reasonably foreseeable projects, in combination with potential residual effects resulting from DP4. Details of the Impact Assessment methodology have not yet been established for assessing potential cumulative changes to items such as underwater noise, strike/collision risk of vessels with marine species, and key contaminant levels over time. GCT will continue to engage with Halalt First Nation through process planning when determining the specific methodology for the cumulative effects assessment.</p>
<p>Overall concern that the Project will obstruct the exercise of Halalt First Nation’s constitutionally protected fishing rights and prevent the passing down of cultural practices and Traditional Knowledge to the younger generation.</p>	<p>The Impact Assessment is required to assess potential Project impacts on Indigenous Interests, rights, and marine use. GCT will continue to engage with Halalt First Nation on this issue during the Project planning and assessment phase, including how the preliminary list of potential effects on Indigenous Interests identified in the Joint Guidelines can incorporate Halalt First Nation constitutionally protected fishing rights.</p>

### 8.4.6 Katzie First Nation

This section describes GCT’s engagement with Katzie First Nation during the Early Engagement Phase. Detailed records of engagement activities with Katzie First Nation are provided in Table 37.

GCT has engaged with Katzie First Nation by emails, letter, phone calls, and virtual meetings. GCT has asked Katzie First Nation to specify their preferred methods of engagement. As engagement progresses, GCT is prepared to modify the methods of engagement should that be requested by Katzie First Nation. In the meantime, GCT will continue to engage Katzie First Nation through various methods.

GCT initiated engagement with Katzie First Nation via phone call on March 2, 2020. On May 7, 2021, GCT invited Katzie First Nation to attend a workshop to discuss the draft DPD, VC selection, Indigenous Interests, and draft Joint Guidelines.

Katzie First Nation has not submitted a notice to engage as a PIN to the BCEAO.

**Table 37: Summary of Key Engagement with Katzie First Nation.**

Dates	Subject	Interaction Type	Summary of Engagement
March 2, 2020	Introduction	Phone Call	<ul style="list-style-type: none"> <li>GCT provided Project information and requested a meeting with Katzie First Nation.</li> </ul>
March 19, 2020	Introduction	Email	<ul style="list-style-type: none"> <li>GCT sent Katzie First Nations a presentation about the Project and a request for a conference call to discuss further.</li> </ul>
May 26, 2020	KMZ File	Email	<ul style="list-style-type: none"> <li>GCT provided the Project KMZ file to Katzie First Nation.</li> </ul>
July 15, 2020	Project Information	Email	<ul style="list-style-type: none"> <li>GCT provided a presentation and received Katzie First Nation briefing confirmation notes.</li> </ul>
July 16, 2020	Meeting	Virtual Meeting	<ul style="list-style-type: none"> <li>GCT provided a presentation on the Project and addressed questions and concerns pertaining to:               <ul style="list-style-type: none"> <li>Short Sea Shipping</li> <li>Cumulative effects</li> <li>RBT2 status</li> <li>IPD process</li> </ul> </li> </ul>
September 29, 2020	IPD	Email	<ul style="list-style-type: none"> <li>GCT provided an update on regulator approval of the IPD.</li> </ul>
October 15, 2020	Comment Period	Email	<ul style="list-style-type: none"> <li>GCT informed Katzie First Nation about the comment period for IAAC.</li> </ul>
October 28, 2020	Follow-Up	Email	<ul style="list-style-type: none"> <li>GCT inquired about Katzie First Nation’s interest in the Project.</li> </ul>
November 2, 2020	Virtual Open House	Email	<ul style="list-style-type: none"> <li>GCT informed Katzie First Nation about upcoming virtual open houses.</li> </ul>
December 9, 2020	Capacity Funding, BCEAO Process	Phone Call and Email	<ul style="list-style-type: none"> <li>GCT asked Katzie First Nation if they have registered for federal capacity funding and to be part of the BCEAO process.</li> </ul>
February 10, 2021	Project Schedule	Email	<ul style="list-style-type: none"> <li>GCT provided a detailed Project schedule for Katzie First Nation’s review of the DPD and Joint Guidelines.</li> </ul>
February 17, 2021	DPD Update	Email	<ul style="list-style-type: none"> <li>GCT informed Katzie First Nation of a DPD submission timeline update.</li> </ul>
April 7, 2021	Draft DPD Feedback Request	Email	<ul style="list-style-type: none"> <li>GCT sent Katzie First Nation a copy of the draft DPD and requested feedback by May 7, 2021.</li> <li>GCT asked for a meeting to discuss the DPD, studies that Katzie First Nation considers necessary in the review of the Project, and VCs.</li> </ul>

**Table 37: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
April 15, 2021	Draft DPD Follow up	Email	<ul style="list-style-type: none"> <li>GCT emailed Katzie First Nation confirming receipt of the DPD and requesting that they provide feedback on the draft DPD by May 7, 2021, and to schedule a meeting.</li> </ul>
May 7, 2021	DPD Workshop Request	Email	<ul style="list-style-type: none"> <li>GCT requested a workshop with Katzie First Nation to discuss the following:               <ul style="list-style-type: none"> <li>Draft DPD feedback</li> <li>VC Selection</li> <li>Indigenous Interests</li> <li>Joint Guidelines.</li> </ul> </li> </ul>

At the time of writing Katzie First Nation had not raised issues or Indigenous Interests relating to the Project. If issues or Indigenous Interests are identified by Katzie First Nation through future engagement, GCT will endeavour to provide responses.

#### 8.4.7 Kwantlen First Nation

This section describes GCT’s engagement with Kwantlen First Nation during the Early Engagement Phase. Detailed records of engagement activities, key interests and issues raised by Kwantlen First Nation are provided in Table 38 and Table 39.

GCT has engaged with Kwantlen First Nation by emails, letter, phone call, and virtual meetings. GCT has asked Kwantlen First Nation to specify their preferred methods of engagement. As engagement progresses, GCT is prepared to modify the methods of engagement should that be requested by Kwantlen First Nation. In the meantime, GCT will continue to engage Kwantlen First Nation through various methods.

GCT initiated engagement with Kwantlen First Nation via an introductory email on February 27, 2020. GCT met with Kwantlen First Nation in May 2020 to provide Project information, address questions and discuss potential issues. GCT provided Kwantlen First Nation with a Draft Capacity Funding Agreement on March 2, 2021, for Kwantlen First Nation’s review. On May 7, 2021, GCT invited Kwantlen First Nation to attend a workshop to discuss the draft DPD, VC selection, Indigenous Interests, and draft Joint Guidelines.

Kwantlen First Nation has not submitted a notice to engage as a PIN to the BCEAO.

**Table 38: Summary of Key Engagement with Kwantlen First Nation.**

Dates	Subject	Interaction Type	Summary of Engagement
February 25, 2020	Introduction	Email	<ul style="list-style-type: none"> <li>GCT provided information about the Project, requested input from Kwantlen First Nation on the IPD and about engagement and participation preferences</li> </ul>



**Table 38: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
March 9, 2020	Follow-Up	Email	<ul style="list-style-type: none"> <li>GCT requested information on Kwantlen First Nation's engagement and participation preferences.</li> </ul>
March 19, 2020	Introduction	Email	<ul style="list-style-type: none"> <li>GCT emailed Kwantlen First Nation a Project presentation and a request for a conference call to discuss further.</li> </ul>
April 15, 2020	Meeting	Virtual Meeting	<ul style="list-style-type: none"> <li>GCT met with Kwantlen First Nation to discuss Project and identify issues.</li> </ul>
May 8, 2020	Project Information, Meeting	Email	<ul style="list-style-type: none"> <li>Kwantlen First Nation requested a follow-up meeting with GCT to review the Project with additional Kwantlen First Nation staff.</li> </ul>
May 13, 2020	Additional Information Request	Conference Call	<ul style="list-style-type: none"> <li>Kwantlen First Nation requested GCT provide additional information on required dredging activity.</li> <li>Kwantlen First Nation requested GCT to provide documents related to the Project.</li> </ul>
May 29, 2020	Project Information	Virtual Meeting	<ul style="list-style-type: none"> <li>GCT met with Kwantlen First Nation staff to review the Project and address their questions.</li> <li>As requested, GCT provided Kwantlen First Nation with the following Project documents: <ul style="list-style-type: none"> <li>Road and rail traffic studies</li> <li>Fisheries report</li> <li>RBTA Study.</li> </ul> </li> </ul>
September 9, 2020	Capacity Funding	Phone Call	<ul style="list-style-type: none"> <li>GCT phoned Kwantlen First Nation about capacity funding and emailed materials from IAAC on capacity funding.</li> </ul>
September 25, 2020	Follow-Up	Email	<ul style="list-style-type: none"> <li>GCT emailed Kwantlen First Nation regarding progress on previously provided material and capacity funding documents.</li> </ul>
September 29, 2020	IPD	Email	<ul style="list-style-type: none"> <li>GCT provided an update on regulator approval of IPD.</li> </ul>
October 15, 2020	Comment Period	Email	<ul style="list-style-type: none"> <li>GCT informed Kwantlen First Nation about the comment period for IAAC.</li> </ul>
November 2, 2020	Virtual Open House	Email	<ul style="list-style-type: none"> <li>GCT emailed Kwantlen First Nation a reminder about the Virtual Open House</li> </ul>

**Table 38: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
February 9, 2021	Follow-Up	Email	<ul style="list-style-type: none"> <li>GCT followed up with Kwantlen First Nation's request to meet, as identified in a meeting with IAAC and BCEAO.</li> </ul>
February 10, 2021	Project Schedule	Email	<ul style="list-style-type: none"> <li>GCT provided a detailed Project schedule for Kwantlen First Nation's review of the DPD and Joint Guidelines.</li> </ul>
February 10, 2021	Meeting	Email	<ul style="list-style-type: none"> <li>GCT emailed Kwantlen First Nation to confirm meeting dates and times.</li> </ul>
February 24, 2021	DPD Update	Email	<ul style="list-style-type: none"> <li>GCT informed Kwantlen First Nation of a DPD update and scheduled a meeting for March 1.</li> </ul>
March 1, 2021	Impact Assessment Studies, VCs	Meeting	<ul style="list-style-type: none"> <li>GCT met with Kwantlen First Nation to discuss Impact Assessment studies and VC selection.</li> </ul>
March 2, 2021	Capacity Funding	Email	<ul style="list-style-type: none"> <li>GCT sent Kwantlen First Nation a draft Capacity Funding Agreement and asked for Kwantlen First Nation's feedback.</li> </ul>
March 23, 2021	Capacity Funding	Email	<ul style="list-style-type: none"> <li>Kwantlen First Nation confirmed receiving the Draft Capacity Funding Agreement and agreed to provide feedback.</li> </ul>
March 16, 2021	VCs	Email	<ul style="list-style-type: none"> <li>GCT provided Kwantlen First Nation with information about VCs that could potentially be included in the assessment process.</li> </ul>
April 7, 2021	Draft DPD Feedback Request	Email	<ul style="list-style-type: none"> <li>GCT sent Kwantlen First Nation a copy of the draft DPD and requested feedback by May 7, 2021.</li> <li>GCT asked for a meeting to discuss the DPD, studies that Kwantlen First Nation considers necessary in the review of the Project, and VCs.</li> </ul>
April 9, 2021	Capacity Funding	Email	<ul style="list-style-type: none"> <li>GCT offered support for Kwantlen First Nation's revision of the Capacity Funding Agreement and requested a meeting to discuss the DPD.</li> </ul>
April 15, 2021	Draft DPD Follow up	Email	<ul style="list-style-type: none"> <li>GCT emailed Kwantlen First Nation confirming receipt of the DPD and requesting that they provide feedback on the draft DPD by May 7, 2021, and to schedule a meeting.</li> </ul>

**Table 38: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
May 7, 2021	Workshop Request	Email	<ul style="list-style-type: none"> <li>• GCT requested a workshop with Kwantlen First Nation to discuss the following:               <ul style="list-style-type: none"> <li>○ Draft DPD</li> <li>○ VC selection</li> <li>○ Indigenous Interests</li> <li>○ Joint Guidelines.</li> </ul> </li> </ul>

During early engagement, Kwantlen First Nation raised various issues relating to the Project. These issues, along with Indigenous Interests raised by Kwantlen First Nation and the corresponding responses from GCT are summarized in Table 39.

**Table 39: Summary of Indigenous Interests and Issues Raised by Kwantlen First Nation.**

Indigenous Interests and Issues Raised	GCT Response
Expressed interest in being involved in the cumulative effects assessment.	The Impact Assessment will require the assessment of cumulative effects from past, present, and reasonably foreseeable projects, in combination with potential residual effects resulting from DP4. GCT will continue to engage with Kwantlen First Nation and explore this issue during the Project planning and assessment phase.
Concerns that the effects of marine vessel movements associated with short sea shipping, road, and rail activities should be considered part of the project regardless of whether they occur outside of GCT's lease boundary.	GCT acknowledges Kwantlen First Nation's concerns related to potential effects associated with short sea shipping, road and rail activities and is evaluating options to assess these activities as part of the Project assessment, since they are incidental activities outside of GCT's care and control.  The determination of the scope of the Impact Assessment will be part of the preparation of the Joint Guidelines. GCT continues to engage with Indigenous nations to provide information on how to determine the spatial scope of the Impact Assessment including factors to be considered. The geographic scope is ultimately determined by the IAAC and the BCEAO.
Concerns about the emissions from the Project.	GCT is committed to reducing and avoiding GHG emissions where possible throughout the advancement of the Project. The Impact Assessment will describe the Project's contribution to the best achievable technologies to mitigate GHG emissions from the Project. GCT will continue to engage with Kwantlen First Nation on this issue during the Project planning and assessment phase.
Concern about the environmental effects and mitigation strategies, relating to dredging and the effects on the Fraser River.	The Impact Assessment is required to assess potential Project effects on marine resources, fish, wildlife, and Indigenous Interests, including traditional use activities.  GCT will continue to engage with Kwantlen First Nation on this issue related to the Fraser River during the Project planning and assessment phase. In response to the expressed concerns about dredging, GCT provided Kwantlen First Nation with a Memorandum drafted by Hatfield dated May 2020 outlining the expected Project dredge area.

**Table 39: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
Concerns and questions about how the Project will impact Kwantlen First Nation's access and connection to the Fraser River and surrounding ecosystem.	The Impact Assessment is required to assess potential Project effects on marine and land use. GCT will continue to engage with Kwantlen First Nation on this issue during the Project planning and assessment phase.

### 8.4.8 Kwikwetlem First Nation

This section describes GCT's engagement with Kwikwetlem First Nation during the Early Engagement Phase. Detailed records of engagement activities, key interests and issues raised by Kwikwetlem First Nation are provided in Table 40 and Table 41.

GCT has engaged with Kwikwetlem First Nation by email, letter, and a virtual meeting. GCT has asked Kwikwetlem First Nation to specify their preferred methods of engagement. As engagement progresses, GCT is prepared to modify the methods of engagement should that be requested by Kwikwetlem First Nation. In the meantime, GCT will continue to engage Kwikwetlem First Nation through various methods.

GCT initiated engagement with Kwikwetlem First Nation on June 26, 2020, by providing a letter outlining the Project, requesting feedback on the IPD, and asking about Kwikwetlem First Nation's engagement preferences. GCT and Kwikwetlem First Nation had a conference call on November 3, 2020, to discuss the Project. On May 7, 2021, GCT invited Kwikwetlem First Nation to attend a workshop to discuss the draft DPD, VC selection, Indigenous Interests, and draft Joint Guidelines

Kwikwetlem First Nation has not submitted a notice to engage as a PIN to the BCEAO.

**Table 40: Summary of Key Engagement with Kwikwetlem First Nation.**

Dates	Subject	Interaction Type	Summary of Engagement
June 26, 2020	Introduction	Letter	<ul style="list-style-type: none"> <li>GCT informed Kwikwetlem First Nation about the Project, requested input on the IPD, and asked Kwikwetlem First Nation's engagement and participation preferences.</li> </ul>
September 29, 2020	IPD	Email	<ul style="list-style-type: none"> <li>GCT provided an update on regulator approval of IPD.</li> </ul>
October 15, 2020	Comment Period	Email	<ul style="list-style-type: none"> <li>GCT informed Kwikwetlem First Nation about the comment period for IAAC.</li> </ul>
November 3, 2020	Meeting	Virtual Meeting	<ul style="list-style-type: none"> <li>GCT and Kwikwetlem First Nation discussed the Project.</li> <li>Kwikwetlem First Nation raised concerns about the Project and requested to be involved in the cumulative effects assessment.</li> </ul>

**Table 40: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
February 10, 2021	Project Schedule	Email	<ul style="list-style-type: none"> <li>GCT provided a detailed Project schedule for Kwikwetlem First Nation's review of the DPD and Joint Guidelines.</li> </ul>
April 7, 2021	Draft DPD Feedback Request	Email	<ul style="list-style-type: none"> <li>GCT sent Kwikwetlem First Nation a copy of the draft DPD and requested feedback by May 7, 2021.</li> <li>GCT asked for a meeting to discuss the DPD, studies that Kwikwetlem First Nation considers necessary in the review of the Project, and VCs.</li> </ul>
April 15, 2021	Draft DPD Follow up	Email	<ul style="list-style-type: none"> <li>GCT emailed Kwikwetlem First Nation confirming receipt of the DPD and requesting that they provide feedback on the draft DPD by May 7, 2021, and to schedule a meeting.</li> </ul>
May 7, 2021	Workshop Request	Email	<ul style="list-style-type: none"> <li>GCT requested a workshop with Kwikwetlem First Nation to discuss the following:               <ul style="list-style-type: none"> <li>Draft DPD feedback</li> <li>VC selection</li> <li>Indigenous Interests</li> <li>Joint Guidelines.</li> </ul> </li> </ul>

During early engagement, Kwikwetlem First Nation raised various issues relating to the Project. These issues, along with Indigenous Interests raised by Kwikwetlem First Nation and the corresponding responses from GCT are summarized in Table 41.

**Table 41: Summary of Indigenous Interests and Issues Raised by Kwikwetlem First Nation.**

Indigenous Interests and Issues Raised	GCT Response
Expressed interest in being involved in the cumulative effects assessment	The Impact Assessment will require the assessment of cumulative effects from past, present, and reasonably foreseeable projects, in combination with potential residual effects resulting from DP4. GCT will continue to engage with Kwikwetlem First Nation and explore this issue during the Project planning and assessment phase.
Concern about project mitigation strategies	GCT will continue to engage with Kwikwetlem First Nation during the Project planning and assessment phase to better understand concerns and develop mitigation strategies.
Concern about ship traffic and the impact of COVID-19 on the long-term forecasts for container traffic.	Impact Assessment is required to assess potential Project effects on marine use and marine navigation. GCT will continue to engage with Kwikwetlem First Nation on this issue during the Project planning and assessment phase.

**Table 41: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>Concern about adverse Project impacts on wildlife, specifically the impact of increased noise on whales.</p>	<p>The Impact Assessment is required to assess potential Project effects on wildlife, including marine mammals. The Impact Assessment may characterize sensory disturbances on whales during construction and operation in the marine mammal assessment. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines for the Project and will be confirmed through additional engagement with Indigenous nations, stakeholders, the public, federal and provincial regulators.</p> <p>GCT will continue to engage with Kwikwetlem First Nation on this issue during the Project planning and assessment phase.</p>
<p>Concerns about the impact on fisheries and sea mammals, such as whales</p>	<p>The Impact Assessment is required to assess potential Project effects on marine resources, fish, wildlife and Indigenous Interests. GCT will continue to engage with Kwikwetlem First Nation on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Kwikwetlem First Nations’ Indigenous Interests identified in the draft Joint Guidelines.</p> <p>SRKW are a critical species and their protection and conservation are important to GCT. Marine mammals including SRKW will be included in the Impact Assessment, and if the Project proceeds to permitting, the Project will also require a permit under the Species at Risk Act. GCT will engage with Indigenous nations including Kwikwetlem First Nation to co-determine how IK and Indigenous views will inform the Impact Assessment of potential effects where we have permission from Kwikwetlem First nation to do so. The assessment of potential effects may include effects on tourism and the broader ecosystem. GCT looks forward to further engagement with Kwikwetlem Nation on this issue as the Impact Assessment progresses and VCs are defined.</p>
<p>Concern about changes to the acoustic environment.</p>	<p>The Impact Assessment will characterize sensory disturbances such as noise during construction and operation in the noise and vibration and the light assessment sections. Potential effects of sensory disturbance to wildlife will be considered in the wildlife resources assessment. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines, and will be confirmed through additional engagement with Indigenous nations, stakeholders, the public, federal and provincial regulators.</p>

#### 8.4.9 Leq’á:mel First Nation

This section describes GCT’s engagement with Leq’á:mel First Nation during the Early Engagement Phase. Detailed records of engagement activities with Leq’á:mel First Nation are provided in Table 42.

GCT has engaged with Leq’á:mel First Nation by letter, phone call, text messages, and email. GCT has asked Leq’á:mel First Nation to specify their preferred methods of engagement. As engagement progresses, GCT is prepared to modify the methods of engagement should that be requested by Leq’á:mel First Nation. In the meantime, GCT will continue to engage Leq’á:mel First Nation through various methods.

In the meantime, GCT will continue to engage Leq’á:mel First Nation through various methods. GCT initiated engagement with Leq’á:mel First Nation on June 10, 2020, via an introductory letter. GCT provided Project updates between September 2020 and February 2021. On May 11, 2021, GCT invited Leq’á:mel First Nation to attend a workshop to discuss the draft DPD, VC selection, Indigenous Interests, and draft Joint Guidelines.

Leq’á:mel First Nation has not submitted a notice to engage as a PIN to the BCEAO.

**Table 42: Summary of Key Engagement with Leq’á:mel First Nation.**

Dates	Subject	Interaction Type	Summary of Engagement
June 10, 2020	Introduction	Letter	<ul style="list-style-type: none"> <li>GCT informed Leq’á:mel First Nation about the Project and requested input on the IPD and about the Leq’á:mel First Nation engagement and participation preferences.</li> </ul>
September 11, 2020	Follow-up	Email	<ul style="list-style-type: none"> <li>GCT emailed Leq’á:mel First Nation to follow up on capacity funding and re- send documents provided by the Federal Government.</li> </ul>
September 17, 2020	Capacity Funding	Email	<ul style="list-style-type: none"> <li>GCT provided Leq’á:mel First Nation with additional information on capacity funding.</li> </ul>
September 29, 2020	IPD	Email	<ul style="list-style-type: none"> <li>GCT informed Leq’á:mel First Nation that IAAC and the BCEAO approved the IPD and the Project was entering the early engagement phase.</li> </ul>
October 15, 2020	Comment Period	Email	<ul style="list-style-type: none"> <li>GCT informed Leq’á:mel First Nation about the comment period for the IPD.</li> </ul>
October 26, 2020	Comment Period, Capacity Funding	Phone Call and Email	<ul style="list-style-type: none"> <li>GCT sent Leq’á:mel First Nation an engagement work plan, information on the IAAC public comment period, and information on IAAC capacity funding opportunities.</li> </ul>
October 28, 2020	Work Plan	Text Messages	<ul style="list-style-type: none"> <li>Leq’á:mel First Nation requested that the work plan be re-sent.</li> </ul>
November 2, 2020	Virtual Open House	Email	<ul style="list-style-type: none"> <li>GCT emailed Leq’á:mel First Nation a reminder about the Virtual Open Houses.</li> </ul>
February 10, 2021	Project Schedule	Email	<ul style="list-style-type: none"> <li>GCT provided a detailed Project schedule for Leq’á:mel First Nation review of the DPD and Joint Guidelines.</li> </ul>

**Table 42: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
February 11, 2021	JSOIE	Email	<ul style="list-style-type: none"> <li>GCT provided Leq'á:mel First Nation with the following information:               <ul style="list-style-type: none"> <li>JSOIE</li> <li>DPD Federal and Provincial guidelines</li> <li>Anticipated DPD timeline</li> </ul> </li> </ul>
February 17, 2021	Draft DPD	Email	<ul style="list-style-type: none"> <li>GCT informed Leq'á:mel First Nation that it was drafting the DPD and asked Leq'á:mel First Nation to provide feedback on the types of studies and VCs they would like included in the DPD.</li> </ul>
April 7, 2021	Draft DPD Feedback Request	Email	<ul style="list-style-type: none"> <li>GCT sent Leq'á:mel First Nation a copy of the draft DPD and requested feedback by May 7, 2021.</li> <li>GCT asked for a meeting to discuss the DPD, studies that Leq'á:mel First Nation considers necessary in the review of the Project, and VCs.</li> </ul>
April 15, 2021	Draft DPD Follow up	Email	<ul style="list-style-type: none"> <li>GCT emailed Leq'á:mel First Nation confirming receipt of the DPD and requesting that they provide feedback on the draft DPD by May 7, 2021, and to schedule a meeting.</li> </ul>
May 11, 2021	Workshop Request	Email	<ul style="list-style-type: none"> <li>GCT requested a workshop with Leq'á:mel First Nation to discuss the following:               <ul style="list-style-type: none"> <li>Draft DPD</li> <li>Indigenous Interests</li> <li>VC selection</li> <li>Joint Guidelines</li> </ul> </li> </ul>

At the time of writing, Leq'á:mel First Nation has not raised issues or Indigenous Interests relating to the Project. If issues or Indigenous Interests are identified by Leq'á:mel First Nation through future engagement, GCT will endeavour to provide responses.

#### 8.4.10 Lyackson First Nation

This section describes GCT's engagement with Lyackson First Nation during the Early Engagement Phase and includes information regarding their notice to engage as a PIN. Detailed records of engagement activities, key interests and issues raised by Lyackson First Nation are provided in Table 43.

GCT has engaged with Lyackson First Nation through letters, emails, phone calls, video calls and an in-person visit. GCT has asked Lyackson First Nation to specify their preferred methods of engagement. As engagement progresses, GCT is prepared to modify the methods of engagement should that be requested by Lyackson First Nation. In the meantime, GCT will continue to engage Lyackson First Nation through various methods.



GCT initiated engagement with Lyackson First Nation via an introductory letter on February 25, 2020. GCT met with the Cowichan Nation communities of Cowichan Tribes, Halalt First Nation, Lyackson First Nation, and Stz'uminus First Nation on November 19, 2020, to discuss engagement. GCT and Lyackson First Nation signed and executed a Capacity Funding Agreement on January 5, 2021. GCT met with Cowichan Tribes, Halalt First Nation, and Lyackson First Nation between April and June, 2021, to discuss capacity funding, updates to the draft DPD, VCs, the Joint Guidelines and Cowichan Tribes' Indigenous Interests.

Lyackson First Nation submitted their notice to engage as a PIN to the BCEAO on November 25, 2020. In their notice, Lyackson First Nation stated that along with their fellow Cowichan Nation communities (Cowichan Tribes, Halalt First Nation, Penelakut Tribe, and Stz'uminus First Nation), Lyackson First Nation asserts and maintains their right to fish and harvest within the Project area.

**Table 43: Summary of Key Engagement with Lyackson First Nation.**

Dates	Subject	Interaction Type	Summary of Engagement
February 25, 2020	Introduction	Letter	<ul style="list-style-type: none"> <li>GCT informed Lyackson First Nation about the Project and requested input on the IPD and about Cowichan Tribe's engagement and participation preferences.</li> </ul>
March 17, 2020	Introduction	In-person	<ul style="list-style-type: none"> <li>GCT visited the Lyackson First Nation office and left a presentation about the Project with Cowichan Tribes staff.</li> </ul>
April 6, 2020	Presentation	Video Call	<ul style="list-style-type: none"> <li>GCT met with Lyackson First Nation to provide a presentation on the Project, answer questions, and discuss:               <ul style="list-style-type: none"> <li>Capacity funding;</li> <li>Vessel traffic and anchorage; and</li> <li>Cumulative effects assessment</li> </ul> </li> </ul>
May 22, 2020	Capacity Funding	Email	<ul style="list-style-type: none"> <li>GCT contacted Lyackson First Nation, Cowichan Tribes, Halalt First Nation, Stz'uminus First Nation and Penelakut Tribe to enquire about interest in accessing federal capacity funding.</li> </ul>
July 29, 2020	Presentation	Video Call	<ul style="list-style-type: none"> <li>GCT met with Cowichan Tribes, Halalt First Nation, Lyackson First Nation, Penelakut, Tribe and Stz'uminus First Nation.</li> <li>GCT gave a presentation on the Project and discussed questions and concerns about the Project.</li> </ul>
September 29, 2020	IPD	Email	<ul style="list-style-type: none"> <li>GCT informed Lyackson First Nation about the comment period for the IPD.</li> </ul>
October 15, 2020	Comment Period	Email	<ul style="list-style-type: none"> <li>GCT informed Lyackson First Nation about the comment period for the IPD</li> </ul>
November 2, 2020	Virtual Open Houses	Email	<ul style="list-style-type: none"> <li>GCT emailed Lyackson First Nation a reminder about the Virtual Open Houses</li> </ul>

**Table 43: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
November 19, 2020	Assessment Process	Meeting	<ul style="list-style-type: none"> <li>GCT held a Virtual Open House meeting with Cowichan Tribes, Halalt First Nation, Lyackson First Nation and Stz'uminus First Nation to discuss the Impact Assessment.</li> </ul>
November 29, 2020	Capacity Funding and MOU	Meeting	<ul style="list-style-type: none"> <li>Meeting with Cowichan Tribes, Halalt First Nation, Lyackson First Nation, and Stz'uminus First Nation to discuss capacity funding and MOUs which address the assessment process.</li> </ul>
December 10, 2020	IPD Comments	Email	<ul style="list-style-type: none"> <li>Cowichan Tribes, Halalt First Nation, Lyackson First Nation, Penelakut First Nation, and Stz'uminus First Nation submitted their comments on the IPD to the BC EAO.</li> </ul>
January 5, 2021	Capacity Funding	Email	<ul style="list-style-type: none"> <li>GCT and Lyackson First Nation signed and executed a Capacity Funding Agreement.</li> </ul>
January 28, 2021	IPD comments, MOU	Meeting	<ul style="list-style-type: none"> <li>GCT met with Cowichan Tribes, Halalt First Nation, Lyackson First Nation, and Penelakut First Nation, and Stz'uminus First Nation to discuss:               <ul style="list-style-type: none"> <li>Past studies</li> <li>Project Timeline</li> <li>Addressing comments in the DPD</li> <li>Capacity Funding</li> <li>MOU discussions.</li> </ul> </li> </ul>
January 29, 2021	IAAC Funding	Email	<ul style="list-style-type: none"> <li>GCT provided Lyackson First Nation with additional information on IAAC capacity funding.</li> </ul>
January 29, 2021	JSOIE	Email	<ul style="list-style-type: none"> <li>GCT sent Lyackson First Nation the final JSOIE.</li> </ul>
February 10, 2021	Project Schedule	Email	<ul style="list-style-type: none"> <li>GCT provided a detailed Project schedule for Lyackson First Nation's review of the DPD and Joint Guidelines.</li> </ul>
April 7, 2021	Draft DPD Feedback Request	Email	<ul style="list-style-type: none"> <li>GCT sent Lyackson First Nation a copy of the draft DPD and requested feedback by May 7, 2021.</li> <li>GCT asked for a meeting to discuss the DPD, studies that Lyackson First Nation considers necessary in the review of the Project, and VCs.</li> </ul>

**Table 43: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
April 29, 2021	Impact Assessment Engagement	Meeting	<ul style="list-style-type: none"> <li>GCT met with Cowichan Tribes, Halalt First Nation, and Lyackson First Nation to discuss:               <ul style="list-style-type: none"> <li>Project Update</li> <li>DPD Discussion</li> <li>Issues raised by Nations</li> <li>VC selection</li> <li>Indigenous Interests</li> </ul> </li> </ul>
May 6, 2021	Draft DPD Feedback Extension	Email	<ul style="list-style-type: none"> <li>Lyackson First Nation requested updates on additional capacity funding, draft DPD, and Tsawwassen First Nation marina access.</li> <li>Lyackson First Nation requested additional time to review the draft DPD.</li> </ul>
May 6, 2021	Feedback Extension and Capacity Funding	Email	<ul style="list-style-type: none"> <li>GCT inquired whether additional capacity funding was required at this time and the purpose of the funding.</li> <li>GCT provided updates on DPD changes.</li> <li>GCT granted an extension for DPD feedback.</li> </ul>
May 7, 2021	Workshop Request	Email	<ul style="list-style-type: none"> <li>GCT requested a workshop with Lyackson First Nation to discuss the following:               <ul style="list-style-type: none"> <li>Draft DPD feedback</li> <li>VC selection</li> <li>Indigenous Interests</li> <li>Joint Guidelines</li> </ul> </li> </ul>
May 11, 2021	DPD Chapter 8	Email	<ul style="list-style-type: none"> <li>GCT provided an updated draft of DPD Chapter 8 which included content which Lyackson had requested be included on April 29. GCT requested feedback on the updates.</li> </ul>
May 14, 2021	Meeting Time and Capacity Funding	Email	<ul style="list-style-type: none"> <li>GCT requested meeting availability for the provided dates, and asked if Lyackson First Nation required further discussion on capacity funding.</li> </ul>
May 18, 2021	Workshop Request	Phone Call	<ul style="list-style-type: none"> <li>GCT phoned Lyackson First Nation to request a workshop on Indigenous Interests, and Lyackson First Nation was not available to answer the call.</li> </ul>
May 19, 2021	Indigenous Interests Workshop Agenda	Email	<ul style="list-style-type: none"> <li>GCT proposed an agenda for the Indigenous Interests workshop which included discussing Indigenous Interests and VCs.</li> </ul>
June 4, 2021	Draft DPD Comments	Email	<ul style="list-style-type: none"> <li>Lyackson First Nation sent GCT their draft DPD comments.</li> </ul>

**Table 43: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
June 15, 2021	VCs and Indigenous Interests Workshop	Meeting	<ul style="list-style-type: none"> <li>• GCT met with Cowichan Tribes, Halalt First Nation, Penelakut Tribe, and Lyackson First Nation to discuss:               <ul style="list-style-type: none"> <li>○ Project update</li> <li>○ Progress and refinement of VC selection</li> <li>○ Preliminary understanding of CNA's Indigenous Interests potential project effects</li> </ul> </li> <li>• CNA identified issues and concerns and GCT responses to CNA comments on the revised DPD.</li> </ul>

During early engagement, Lyackson First Nation raised various issues related to the Project. These issues, along with Indigenous Interests raised by Lyackson First Nation and the corresponding GCT responses, are summarized in Table 44.

**Table 44: Summary of Indigenous Interests and Issues Raised by Lyackson First Nation.**

Indigenous Interests and Issues Raised	GCT Response
Assert their Aboriginal title and right to fish with the Project footprint and surrounding areas.	The Impact Assessment is required to assess the potential Project effects on Indigenous Interests. GCT will continue to engage with Lyackson First Nation on these issues during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Lyackson First Nation's Indigenous Interests identified in the draft Joint Guidelines.
Concerns about the impacts to fish and fish habitat and potential subsequent effects to access to culturally appropriate resources (e.g., FSC fisheries)	The Impact Assessment is required to assess potential Project effects on fish, marine resources, wildlife as well as Indigenous Interests. GCT will continue to engage with Lyackson First Nation on these issues during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Lyackson First Nations' Indigenous Interests identified in the draft Joint Guidelines.
Concerns about safe and culturally appropriate access to resources (e.g., FSC fisheries)	The Impact Assessment is required to assess the potential Project effects on marine use, marine navigation, and Indigenous Interests. GCT will continue to engage with Lyackson First Nation on these issues during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Lyackson First Nation's Indigenous Interests identified in the draft Joint Guidelines.

**Table 44: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
Concerns about the impacts of vessel traffic.	The Impact Assessment is required to assess marine use and marine navigation. GCT will continue to engage with Lyackson First Nation on this issue during the Project planning and assessment phase.
Concerns about the potential impacts to wildlife including forage fish, migratory birds, shellfish, marine flora, and the endangered SRKW.	The Impact Assessment is required to assess potential Project effects on wildlife, marine resources, fish and vegetation. GCT will continue to engage with Lyackson First Nation on these issues during the Project planning and assessment phase.
Use of area for FSC purposes and economic opportunities including Aboriginal Communal Fishing Licenses.	The Impact Assessment is required to assess the potential impacts of the Project on Indigenous Interests. GCT will continue to engage with Lyackson First Nation on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Lyackson First Nation’s Indigenous Interests identified in the draft Joint Guidelines.
Aboriginal title and fishing and harvesting rights to Tl’uqtinus village site.	The Impact Assessment is required to assess the potential Project impacts on Indigenous Interests. GCT will continue to engage with Lyackson First Nation on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Lyackson First Nation’s Indigenous Interests identified in the draft Joint Guidelines.
Recognition of other Indigenous nations’ rights & title in the area.	The Impact Assessment is required to assess potential Project impacts on Indigenous Interests and rights. GCT will continue to engage with Lyackson First Nation on this issue during the Project planning and assessment phase.
Principles of UNDRIP and of FPIC should be reflected in the document.	The Federal and Provincial governments have taken various steps to incorporate UNDRIP principles into the new Impact Assessment. GCT will be following this process during the Project planning and assessment phase.
Questions related to initial habitat inventory, cumulative impact assessment and past studies around sediment, coal dust, disposal at sea, eelgrass and intertidal marsh mapping, water quality, noise, and fish habitat offsetting.	GCT’s technical personnel will engage with Lyackson First Nation to identify specific areas where gaps exist, and where further information and studies are required.
Concerns and questions about mitigation and offsetting measures for potential impacts to fish/fish habitat, WMA, migratory birds, shellfish, marine flora, water quality, and SRKW during all Project phases, including should there be an accident or malfunction.	GCT is committed to meaningful engagement for proposed mitigation and offsetting measures as the Project progresses through the Impact Assessment. GCT looks forward to engaging with Lyackson First Nation to address specific questions and concerns regarding mitigation and offsetting measures during construction, and spill response planning.

**Table 44: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
Concerns and questions about the adverse impacts of scour protection, dust, noise, and light pollution from the Project.	The Impact Assessment will characterize sensory disturbances such as lighting during construction and operation in the noise and vibration and the light assessment sections. Potential effects of sensory disturbance to wildlife will be considered in the wildlife resources assessment. The factors to be considered, and the scope of those factors, will be described in the draft Joint Guidelines, and will be confirmed through additional engagement with Indigenous nations, stakeholders, the public, federal and provincial regulators
Old data from past projects should not be utilized as supplementary or supporting information to inform the Project.	GCT will provide Lyackson First Nation with a list of secondary sources for validation purposes on topic areas relating to Indigenous Interests.
Request for job opportunities, accommodations for workers from outside Metro Vancouver, and for GCT to provide information and assistance to Indigenous individuals who are interested in operational employment.	GCT is committed to providing information and assistance to Lyackson First Nation members who are interested in operational employment and facilitating engagement with the BC Maritime Employers Association. GCT will engage with Lyackson First Nation about possible job opportunities and accommodation options during the Project planning and assessment phase of the Project.
Concerns about the impacts of rock fill, dredging material and road watering on water quality, water clarity, habitat, foraging, eelgrass beds and critical habitat processes including nutrient transfer.	The Impact Assessment is required to assess potential Project impacts on Indigenous Interests and the environment. GCT will continue to engage with Lyackson First Nation on these issues during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Lyackson First Nation’s Indigenous Interests identified in the draft Joint Guidelines.
Important to effectively monitor water quality, water clarity, light, noise, and vibration levels during construction, throughout all phases of the Project, and beyond.	The Impact Assessment is required to assess the potential Project impacts on water quality and clarity. The Impact Assessment will characterize sensory disturbances such as lighting during construction and operation in the noise and vibration and the light assessment sections. Potential effects of sensory disturbance to wildlife will be considered in the wildlife resources assessment. The factors to be considered, and the scope of those factors, will be described in the draft Joint Guidelines, and will be confirmed through additional engagement with Indigenous nations, stakeholders, the public, federal and provincial regulators. GCT will continue to engage with Lyackson First Nation on these issues during the Project planning and assessment phase.

**Table 44: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>Concerns and questions about effective collaboration, input during construction window, and time allotment for Lyackson First Nation review of developments and mitigation measures.</p>	<p>GCT will continue discussions with Lyackson First Nation on how to consult and collaborate in a respectful and meaningful way.</p>
<p>Concerns about the efficacy and efficiency of the Oceans Protection Plan and Short Sea Shipping, including its impacts on fish and fish habitat in the Fraser River and its interference with the ability of Lyackson First Nation to exercise harvesting rights in the area. The cumulative impacts of Short Sea Shipping must be considered in the context of multiple proposed projects in the South Arm area.</p>	<p>The Impact Assessment is required to assess marine use, and marine navigation, the environment and Indigenous Interests and rights. GCT appreciates the importance of the Fraser River and supports the concept of re-establishing something similar to the FREMP by the relevant governments and agencies. The factors to be considered, and the scope of those factors, will be described in the draft Joint Guidelines and will be confirmed through additional engagement with Indigenous nations, stakeholders, the public, federal and provincial regulators. GCT will continue to engage with Lyackson First Nation on this issue during the Project planning and assessment phase.</p>
<p>Inclusion and accessibility of communities in environmental and heritage monitoring.</p>	<p>GCT will continue to engage with Lyackson First Nation during the Project planning and assessment phase about opportunities for them to be included in future environmental and heritage monitoring plans.</p>
<p>Concerns about using current accommodations and programs (i.e., TMX accommodations) to ensure a favourable Impact Assessment. Those programs are meant to be specific to the TMX pipeline and should not be relied on in other projects, only referenced as additional measures occurring in/adjacent to the Project area.</p>	<p>Project-specific mitigations will be required for DP4. GCT will continue to engage with Lyackson First Nation on this issue during upcoming engagement activities. GCT commits to ongoing engagement with Lyackson First Nation to identify gaps of information and accommodation programs that would be specific to the Project.</p>
<p>Concerns that GCT has not outlined any commitments to work with our communities as to what specific benefits would best support our diverse needs and interests. Specifically in regard to the impacts a project of this magnitude would produce.</p>	<p>GCT has signed a Capacity Funding Agreement with Lyackson First Nation that provides for the development of a Memorandum of Understanding (MOU) that could lead to mutual benefit agreements with Lyackson First Nation.</p>
<p>Concern with GCT’s approach that appears to privilege Treaty Rights over Aboriginal Rights. Despite documented strong fishing rights proximal to the Project area and the use of multiple Fishing Areas for Food, Social and Ceremonial quotas directly adjacent to the proposed Project, Lyackson First Nation has not been provided with the opportunity to work in collaboration on marine harvesting access in the Project area.</p>	<p>GCT will continue to engage with Lyackson First Nation to get a better understanding of the number and size of vessels they are looking to have accessible in the area. GCT is committed to proposing relevant solutions.</p>

**Table 44: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>(Cont'd.) This has been raised on three occasions and GCT has failed to provide a satisfactory response. Lyackson First Nation seeks the same opportunities, funding, support, and benefits as afforded to other communities with rights in the Project area, including, amongst others, the opportunity for a new vessel marina and boat launch to support harvesting.</p>	
<p>Concerns about increase in vessel traffic and increase size of vessels. Request that the impacts of larger vessels be fully considered in the assessment and expect GCT to commit to a maximum number of vessels per annum and base their impact assessment on this maximum number of vessels.</p>	<p>GCT plans to assess larger vessels and the maximum number of vessels that are expected to call at DP4. Container vessels call at GCT Deltaport on a fixed schedule and through many years of operating GCT Deltaport, there is an excellent understanding of the shipping lines. GCT has also commissioned independent studies of expected vessel calls (size and frequency) in the future, as described in the DPD.</p>
<p>Concerns about the lack of information provided to Lyackson First Nation about the Salish Sea Indigenous Guardians Association.</p>	<p>In 2020, GCT provided financial support for the Indigenous-led initiative, known as the SSIGA. While GCT is not involved in the ongoing operations of the SSIGA having heard of this concern GCT followed up and now understands that SSIGA and Lyackson First Nation representatives were in contact regarding an Indigenous-led cumulative effects initiative in October of 2020.</p>
<p>Concerns about the fragile state of salmon. Request that GCT include a discussion about the currently deteriorating state of the Fraser River salmon run. Given the poor health of this run and the subsequent impacts to Lyackson First Nation community's Food, Social, and Ceremonial quota, Lyackson First Nations has incredibly low risk tolerance for Project impacts that could further deteriorate the state of the Fraser River salmon run, its ability to provide needed subsistence and cultural resources for Indigenous communities, and the ability to exercise the Indigenous right to fish.</p>	<p>GCT acknowledges Lyackson First Nation's concerns regarding salmon. Potential impacts on salmon are acknowledged in the DPD, will be discussed in the Joint Guidelines that will describe the assessment methodology and will be a key part of the Impact Assessment. We appreciate the importance of the states of the Fraser River salmon runs to the biological setting and have added such a statement to Section 6.3 of the DPD, as requested.</p>
<p>Lyackson First Nation is unsatisfied with all the responses provided by GCT to date. Lyackson First Nation requires deeper engagement and meaningful responses to the concerns raised than has been provided by GCT thus far.</p>	<p>GCT acknowledges that there are unresolved concerns at this early stage of the assessment process. GCT will continue to engage with Lyackson First Nation on this issue during the Project planning and assessment phase. This will include discussions around the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Lyackson First Nation Indigenous Interests identified in the draft Joint Guidelines.</p>



**Table 44: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
Concerns that GCT is using the lower number of transit from the estimate rather than the higher number to base the assessment off of. Request that GCT base its assessment off the maximum number of transits.	GCT will use the maximum number of transits (1560 transits) in the assessment of effects. GCT will continue to engage with Lyackson First Nation on this issue during the Project planning and assessment phase.

Table 45 summarizes issues and concerns raised by Lyackson First Nation in relation DP4 project. At the request of the Lyackson First Nation in order to support their review of the DPD, the table also includes issues raised in response to another proposed project in the Roberts Bank area, and which GCT understands may also be applicable to DP4.

**Table 45 Summary of Indigenous Interests and Issues Raised by Lyackson First Nation Which May Also Be Applicable to the Project.**

Indigenous Interests and Issues Raised	GCT Response
Concern that the Project and associated vessel traffic will limit the abilities of Lyackson First Nation members to access Fraser River salmon for FSC purposes by excluding harvesters from key fishing areas, due to shipping traffic.	The Impact Assessment is required to assess potential Project on Indigenous Interests and rights. GCT will continue to engage with Lyackson First Nation on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Lyackson First Nation’s Indigenous Interests identified in the draft Joint Guidelines.
Concerns about industrial change and disturbance contributing to the expansion of the existing ‘dead zone’ between the Deltaport causeway and BC Ferries terminal causeway where fish cannot survive.	The fish and fish habitat assessment will include a detailed characterization of the current habitat conditions in the area between the causeways. The fish and fish habitat assessment will be informed by the assessments of factors such as, but not limited to, water quality and sediment quality, including the lower trophic levels of the marine food web. GCT will continue to engage with Lyackson First Nation on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Lyackson First Nation’s Indigenous Interests identified in the draft Joint Guidelines.
Concerns about economic impacts to Hul’q’umi’num Fisheries Limited Partnership, which Lyackson is a member, from limiting access to fishing areas, impacts to shorelines from vessel wakes, pollution, and accidents/oil spills.	The Impact Assessment is required to assess potential Project impacts on Indigenous Interests. GCT will continue to engage with Lyackson First Nation on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Lyackson First Nation’s Indigenous Interests identified in the draft Joint Guidelines.
Concerns about impacts from vessel wake erosion, shipping discharges and other potential chemical pollution on other marine harvesting opportunities (e.g., shellfish, crabs, roe) and associated habitats.	The Impact Assessment will include the marine shipping component and address issues associated with marine use and potential impacts to marine habitats. It will also include an assessment of potential malfunctions and accidents that could affect habitats, marine use and harvesting opportunities. GCT will continue to engage with Lyackson First Nation on this issue during the Project planning and assessment phase.

**Table 45: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
Concerns about vessel wakes on shorebird populations from impacts to habitat and food sources, which will limit hunting success.	GCT understands the importance of protecting shorebird populations and is evaluating options to address potential effects through the assessment of water quality, sediment quality, biofilm, fish and fish habitat and other effects pathways. The wildlife assessment includes the assessment to direct effects to shorebirds, as well as indirect effects like habitat alteration through vessel movements. GCT will continue to engage with Lyackson First Nation on this issue during the Project planning and assessment phase.
Concerns about the potential for spread of invasive species that could have devastating impacts on native species/ecosystems	GCT acknowledges Lyackson First Nation’s concerns related to the introduction of invasive species and the current inspection system administered under Canadian legislation. GCT abides by all regulatory requirements for ships that are berthed at Deltaport but has no ability to direct or influence vessels at sea. GCT encourages Lyackson First Nation to communicate its concerns to Transport Canada who regulates activities such as ballast water exchange that could lead to the introduction of invasive species.
Concerns about sensory disturbances (e.g., light, sound, vibrations) associated with increased vessel traffic during construction and operation on Lyackson campground on Le’eyqsun that is part of a broader economic development plan.	The Impact Assessment is required to assess potential project impacts on the environment and on Indigenous Interests. GCT will continue to engage with Lyackson First Nation on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Lyackson First Nation’s Indigenous Interests identified in the draft Joint Guidelines.
Concerns about sensory disturbances (e.g., light, sound, vibrations) associated with increased vessel traffic during construction and operation on Lyackson campground on Le’eyqsun that is part of a broader economic development plan.	The Impact Assessment is required to assess potential Project impacts on the environment and on Indigenous Interests. GCT will continue to engage with Lyackson First Nation on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Lyackson First Nation’s Indigenous Interests identified in the draft Joint Guidelines.

#### 8.4.11 Malahat Nation

This section describes GCT’s engagement with Malahat Nation during the Early Engagement Phase and includes information regarding their notice to engage as a PIN. Detailed records of engagement activities, key interests and issues raised by Malahat Nation are provided in Table 46 and Table 47.

GCT has engaged with Malahat Nation by email, letter, phone calls, in-person visit, and virtual meetings. GCT has asked Malahat Nation to specify their preferred methods of engagement. As engagement progresses, GCT is prepared to modify the methods of engagement should that be requested by Malahat Nation. In the meantime, GCT will continue to engage Malahat Nation through various methods.

GCT initiated engagement with Malahat Nation on February 25, 2020, via an introductory letter. GCT and Malahat Nation met in August to discuss the Project, including initial concerns and issues. GCT met with Malahat Nation in February 2021 to discuss concerns, capacity funding and MOUs, DPD updates, cumulative effects assessment, and

completing an IK study. Malahat Nation and GCT signed a Capacity Funding Agreement on December 11, 2020. GCT met with Malahat Nation in June 2021 to discuss capacity funding, updates to the draft DPD, VCs, the Joint Guidelines and Malahat Nation’s Indigenous Interests.

Malahat Nation submitted its notice to engage as a PIN to the BCEAO on November 27, 2020. In their notice, Malahat Nation stated that the Project is likely to impact Malahat Nation’s Douglas Treaty rights, and rights under Section 35 of the *Constitution Act* (1982).

**Table 46: Summary of Key Engagement with Malahat Nation.**

Dates	Subject	Interaction Type	Summary of Engagement
February 25, 2020	Introduction	Letter	<ul style="list-style-type: none"> <li>GCT informed Malahat Nation about the Project and requested input on the IPD and about Malahat Nation engagement and participation preferences.</li> </ul>
March 3, 2020	Introduction	Phone Call and Email	<ul style="list-style-type: none"> <li>GCT discussed the Project and engagement plans with Malahat Nation</li> </ul>
March 3, 2020	Follow-up	Email	<ul style="list-style-type: none"> <li>GCT followed up with Malahat Nation on the status of the introduction letter sent to Malahat First Nation and their engagement preferences.</li> <li>GCT invited Malahat Nation to have a meeting to discuss the Project.</li> </ul>
March 16, 2020	Presentation	In-person	<ul style="list-style-type: none"> <li>GCT gave a presentation on the Project to the Malahat Nation Band Office.</li> </ul>
April 8, 2020	Presentation	Email	<ul style="list-style-type: none"> <li>GCT sent an electronic copy of a presentation on the Project.</li> </ul>
April 29, 2020	Introduction	Phone Call	<ul style="list-style-type: none"> <li>GCT had an introductory call with the new contact person from Malahat Nation for the Project.</li> </ul>
August 17, 2020	Introduction	Virtual Meeting	<ul style="list-style-type: none"> <li>GCT gave a presentation on the Project to Malahat Nation.</li> </ul>
August 18, 2020	GCT Studies	Email	<ul style="list-style-type: none"> <li>GCT provided Malahat Nation with studies on the Deltaport Expansion Berth 4 Project:               <ul style="list-style-type: none"> <li>Analysis of Capacity Options on the West Coast of Canada by Black Quay</li> <li>GCT Deltaport Expansion: Offsetting Outline and Approach by Hemmera Envirochem</li> <li>Preliminary Environmental Impacts Comparison: RBT2 &amp; DP4 by PGL Environmental Consultants</li> </ul> </li> </ul>

**Table 46: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
(Cont'd.)	(Cont'd.)	(Cont'd.)	<ul style="list-style-type: none"> <li>○ Assessment of Policy Options to Satisfy Canadian West Coast Container Port Capacity Needs by CPCS Global Container Terminals</li> <li>○ Conceptual DFO Fisheries Offset Plan by Amec Foster Wheeler</li> <li>○ Roberts Bank Container Terminal Capacity Enhancement Alternatives.</li> </ul>
August 18, 2020	Presentation	Meeting	<ul style="list-style-type: none"> <li>• GCT provided a presentation on the Project and addressed questions and issues raised by Malahat Nation.</li> </ul>
August 18, 2020	Engagement Workplan	Email	<ul style="list-style-type: none"> <li>• GCT provided Malahat Nation with a work plan for near-term engagement.</li> <li>• Malahat Nation informed GCT that they are interested in participating in the Indigenous-led initiative on cumulative effects on the Salish Sea.</li> </ul>
September 4, 2020	Near Term Workplan and IK	Email	<ul style="list-style-type: none"> <li>• Malahat Nation provided GCT with proposed areas including work on the design of an IK use and occupancy study.</li> <li>• Malahat Nation offered to provide GCT access to their environmental datasets.</li> </ul>
September 23, 2020	GCT Studies	Email	<ul style="list-style-type: none"> <li>• GCT provided Malahat Nation with an Economic Impact Study of the Project.</li> </ul>
September 29, 2020	IPD	Email	<ul style="list-style-type: none"> <li>• GCT provided an update on regulator approval of the IPD.</li> </ul>
October 15, 2020	Public comment period	Email	<ul style="list-style-type: none"> <li>• GCT informed Malahat Nation about the comment period for the IPD.</li> </ul>
November 2, 2020	Virtual Open House	Email	<ul style="list-style-type: none"> <li>• GCT provided a reminder about the upcoming virtual open house.</li> </ul>
November 26, 2020	Initial Comments	Email	<ul style="list-style-type: none"> <li>• Malahat Nation informed GCT that they will be providing IAA with initial comments.</li> </ul>
December 11, 2020	Capacity Funding	Email	<ul style="list-style-type: none"> <li>• Malahat Nation and GCT signed a Capacity Funding Agreement.</li> </ul>
February 1, 2021	Initial comments	Email	<ul style="list-style-type: none"> <li>• Malahat Nation sent GCT a summary of initial comments on the Project.</li> </ul>
February 2, 2021	DPD, Cumulative Effects, IK	Meeting	<ul style="list-style-type: none"> <li>• GCT met with Malahat to discuss:               <ul style="list-style-type: none"> <li>○ DPD updates</li> <li>○ Cumulative effects assessment</li> <li>○ IK studies.</li> </ul> </li> </ul>

**Table 46: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
February 10, 2021	Project Schedule	Email	<ul style="list-style-type: none"> <li>GCT provided a detailed Project schedule for Malahat Nation’s review of the DPD and Joint Guidelines.</li> </ul>
April 7, 2021	Draft DPD Feedback Request	Email	<ul style="list-style-type: none"> <li>GCT sent Malahat Nation a copy of the draft DPD and requested feedback by May 7, 2021.</li> <li>GCT asked for a meeting to discuss the DPD, studies that Malahat Nation considers necessary in the review of the Project, and VCs</li> </ul>
April 13, 2021	Draft DPD Follow up	Email	<ul style="list-style-type: none"> <li>GCT emailed Malahat Nation confirming receipt of the DPD and requesting that they provide feedback on the draft DPD by May 7, 2021, and to schedule a meeting.</li> </ul>
April 29, 2021	DPD and IK Review	Email	<ul style="list-style-type: none"> <li>Malahat Nation updated GCT on DPD review and scoping the Traditional Knowledge study, and requested a draft MOU.</li> </ul>
April 30, 2021	DPD Feedback and Meeting Request	Email	<ul style="list-style-type: none"> <li>GCT thanked Malahat Nation for scoping the Traditional Knowledge study and requested the following: <ul style="list-style-type: none"> <li>Completed DPD review and feedback by May 24, 2021</li> <li>Meeting availability between May 24 and June 4 to discuss VC selection and Indigenous Interests</li> </ul> </li> </ul>
May 7, 2021	Workshop Request	Email	<ul style="list-style-type: none"> <li>GCT requested a workshop with Malahat Nation to discuss the following: <ul style="list-style-type: none"> <li>DPD feedback</li> <li>Indigenous Interests</li> <li>VC selection</li> <li>Joint Guidelines</li> </ul> </li> </ul>
May 14, 2021	Meeting Confirmation and Draft MOU	Email	<ul style="list-style-type: none"> <li>GCT confirmed June 4, 2021, meeting time and updated Malahat Nation on draft MOU progress.</li> </ul>
June 3, 2021	Draft DPD Comments	Email	<ul style="list-style-type: none"> <li>Malahat Nation sent GCT their draft DPD comments and a contribution request for Indigenous Knowledge gathering and ongoing capacity funding.</li> </ul>

**Table 46: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
June 4, 2021	VCs and Indigenous Interests Workshop	Meeting	<ul style="list-style-type: none"> <li>• GCT met with Malahat Nation to discuss:               <ul style="list-style-type: none"> <li>○ Project update</li> <li>○ Progress and refinement of VC selection</li> <li>○ GCT’s understanding of Malahat Nation’s Indigenous Interests</li> <li>○ Malahat Nation’s issues and concerns</li> </ul> </li> </ul>

During early engagement with Malahat Nation, certain issues relating to the Project were raised. These issues, along with Indigenous Interest raised by Malahat Nation and the corresponding responses from GCT are summarized in Table 47.

**Table 47: Summary of Indigenous Interests and Issues Raised by Malahat Nation.**

Indigenous Interests and Issues Raised	GCT Response
Concerns about the continuation of sustainable fisheries. Malahat Nation indicated that it is involved in the Marine Shipping and Cumulative Effects Coordination Committee and that it will inform GCT if the scope of work does not include elements that Malahat Nation considers essential.	The Impact Assessment is required to assess potential impacts of the project on marine resources, fish, wildlife and Indigenous Interests, including traditional use activities. Effects on fish, fishing, and traditional foods are also likely to be included in the Impact Assessment. GCT will continue to engage with Malahat Nation on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Malahat Nations’ Indigenous Interests identified in the draft Joint Guidelines. If Malahat Nation identifies that existing cumulative effects work being done through the Marine Shipping and Cumulative Effects Coordination Committee does not consider Malahat Nation’s interest, GCT is open to discussions regarding support for additional studies to contribute to Malahat Nation’s work on this topic.
Concern about the ability to fully utilize their commercial crab licenses	The Impact Assessment is required to assess potential Project impacts on marine resources, and Indigenous Interests. Effects on fish, fishing, and traditional foods including crab are also likely to be included in the Impact Assessment. GCT will continue to engage with Malahat Nation on this issue during the project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Malahat Nations’ Indigenous Interests identified in the draft Joint Guidelines.

**Table 47: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>Concerns about the Project impacts to ecosystems and species, in particular, marine mammals and migratory birds. Interest in supporting the maintenance and growth of marine mammal populations in the Salish Sea.</p>	<p>The Impact Assessment is required to assess potential Project impacts on marine resources, fish, wildlife and Indigenous Interests. GCT will continue to engage with Malahat Nation on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in Section 7.8 and list of potential effects on Malahat Nations’ Indigenous Interests identified in the draft Joint Guidelines.</p> <p>Marine mammals including SRKWs will be included in the Project assessment, and if the Project proceeds to permitting, the Project will also require a permit under the Species at Risk Act. GCT will engage with Indigenous nations including Malahat Nation to co-determine how IK and Indigenous views will inform the Impact Assessment of potential effects where we have permission from Malahat Nation to do so. The assessment of potential effects may include effects on tourism and the broader ecosystem. GCT looks forward to further engagement with Malahat Nation on this issue as the Impact Assessment progresses and VCs are defined.</p>
<p>Concern about the Project impacts on Malahat Nation’s ability to continue cultural traditions, connect with places of significance, transmit intergenerational knowledge and maintain connections.</p>	<p>The Impact Assessment is required to assess potential Project impacts on Indigenous interest and culture, including cultural continuation. GCT will continue to engage with Malahat Nation on this issue during the project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Malahat Nations’ Indigenous Interests identified in the draft Joint Guidelines.</p>
<p>Concern about the potential effects to coastal archaeological sites and subsequent effects to Malahat Nation’s spirituality and well-being. Specific concern about the potential effects to coastal archeological sites from increased shipping traffic and erosion.</p>	<p>The Impact Assessment is required to assess the potential impacts of the project on physical and cultural heritage. The assessment of potential effects on coastal geomorphology may include an assessment of the effects of vessel wakes. The assessment could be focused on the maneuvering of vessels in the vicinity of the proposed project and consider the potential wake effects from ship traffic in the shipping corridors. GCT will continue to engage with Malahat Nation on this issue during Project planning and assessment phase, including on how the preliminary list of potential effects on Indigenous Interests identified in the Joint Guidelines can incorporate effects on areas of high archaeological potential and use of cultural places.</p>

**Table 47: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>Concerns about increased marine shipping traffic due to the Project and its impacts on Malahat Nation’s ability to travel safely throughout their marine territory.</p>	<p>The Impact Assessment is required to assess potential Project impacts on marine use and marine navigation. GCT will continue to engage with Malahat Nation on this issue during Project planning and assessment phase.</p>
<p>Concern about the potential marine shipping impacts to Malahat Nation’s culture and cultural practices including the ability to:</p> <ul style="list-style-type: none"> <li>• Continue cultural traditions.</li> <li>• Connect with places of significance within the territory.</li> <li>• Transmit intergenerational IK.</li> <li>• Maintain connections with neighbouring Indigenous communities.</li> <li>• Exercise their Douglas Treaty rights and title in relation to fishing and marine resource harvesting.</li> </ul>	<p>The Impact Assessment is required to assess potential Project impacts on physical and cultural heritage. GCT will continue to engage with Malahat Nation on this issue during Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the Joint Guidelines can incorporate effects on areas of high archaeological potential and use of cultural places.</p>
<p>Concerns with the increase in vessel size and number, including effects on tidal and coastal geomorphic environments and increased risks of vessel collisions or fuel/cargo spills.</p>	<p>The Impact Assessment is required to assess the potential for malfunctions and accidents, the potential Project environmental impacts including impacts to marine use. GCT is planning a risk-based approach for the assessment of malfunctions and accidents that could impact VCs and Indigenous Interests identified for the project. This could include assessment of the consequence of incidents and consider potential environmental, economic, social, cultural and health effects and effects to Indigenous Interests.</p> <p>Alterations to coastal geomorphology will be considered in the assessment. This may include vessel wake. Alterations in coastal geomorphology may inform the effect pathway for the assessment of effects to VCs, such as, but not limited to, Fish and Fish Habitat and Archaeology. GCT will continue to engage with Malahat Nation on this issue during the Project planning and assessment phase.</p>
<p>The SRKW is culturally and spiritually significant to the Malahat Nation. Concerns with negative impacts on SRKW, including:</p> <ul style="list-style-type: none"> <li>• Potential increase in underwater acoustic disturbance on SKRW behaviour, foraging, and survival, particularly given the overlap between the Project and marine shipping area and SRKW critical habitat</li> <li>• Habitat changes leading to reduced prey availability</li> <li>• Biomagnification and bioaccumulation of toxins sourced from bilge water, bottom paint, lubricants, and hydrocarbon exhaust.</li> </ul>	<p>SRKW are a critical species and their protection and conservation are important to GCT. Marine mammals including SRKW will be included in the Impact Assessment, and if the Project proceeds to permitting, the Project will also require a permit under the Species at Risk Act. GCT will engage with Indigenous nations including Malahat Nation to co-determine how IK and Indigenous views will inform the Impact Assessment of potential effects where we have permission from Malahat Nation to do so. The assessment of potential effects may include effects on the broader ecosystem.</p>



**Table 47: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
(Cont'd.)	<p>GCT looks forward to further engagement with Malahat Nation on this issue as the Impact Assessment progresses and VCs are defined.</p> <p>Additionally, the Impact Assessment is required to assess potential Project environmental impacts. GCT will continue to engage with Malahat Nation in an effort to avoid and mitigate adverse effects on the environment.</p>
<p>Concerns with potential impacts on other cetaceans and marine mammal species, including seals and sea lions, from increased marine traffic during project construction, operations, and marine shipping.</p>	<p>The Impact Assessment is required to assess potential Project environmental impacts, as well as impacts to the acoustic environment. GCT will continue to engage with Malahat Nation on these issues during the Project planning and assessment phase.</p>
<p>Impacts to fish and marine resource use, including:</p> <ul style="list-style-type: none"> <li>• Changes to Malahat Nation’s stewardship responsibilities to marine species within the traditional territory and the potential effects to Malahat Nation’s social and cultural uses of marine resources.</li> <li>• Changes to Malahat Nation’s food fish distribution within the community and the potential negative effects to the health community and a loss of cultural identity</li> <li>• Effects on Malahat Nation’s ability to harvest marine resources for economic purposes.</li> </ul>	<p>The Impact Assessment is required to assess potential Project impacts on marine use and Indigenous Interests. GCT will continue to engage with Malahat Nation on this issue during the Project planning and assessment phase, including how the preliminary list of potential effects on Indigenous Interests identified in the Joint Guidelines can incorporate Malahat Nations stewardship responsibilities, and cultural practices for conducting fishing for FSC purposes.</p>
<p>Impacts to sensitive ecosystems and feasibility offsetting, including:</p> <ul style="list-style-type: none"> <li>• Changes to sediment transport, freshwater and marine flow exchange, and the availability or nutritional composition of the biofilm from dredging and Project construction and operation, and its potential effects on migratory shorebirds</li> <li>• Effects to the Saanich Inlet ecosystem as a result of sediment changes from the Project</li> <li>• Concerns with the feasibility of avoiding impacts to sensitive ecosystems and the effectiveness of habitat offsetting measures as a result of unique ecological attributes and the scientific uncertainty involved in biofilm impact mitigation measures.</li> </ul>	<p>The Project will require an Authorization under the <i>Fisheries Act</i>, which will require the development of a Habitat Offsetting Plan. DFO may account for the uncertainty associated with the effectiveness of the habitat offsetting by requiring a greater amount of offsetting. Monitoring will also be required to demonstrate that the habitat offsetting has been successful. Typically, this will occur in years 1, 3 and 5 post-construction but can be longer and more frequent depending on the specific characteristics of the offsetting. Success criteria are defined in the <i>Fisheries Act</i> authorization along with adaptive management measures to be implemented if these criteria are not met. A financial guarantee must also be provided to DFO with the authorization application to enable DFO to deliver the offsetting objective and achieve success criteria if the proponent does not.</p> <p>GCT will continue to engage with Malahat Nation on this issue during the Project planning and assessment phase.</p>

**Table 47: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
Concerns with the Project’s contribution to climate change and sea-level rise.	GCT is committed to addressing the issue of climate change and reducing and avoiding GHG emissions where possible throughout the advancement of the Project. The Impact Assessment will describe the Project’s contribution to best achievable technologies to mitigate GHG emissions and other potential sources of climate change from the Project and address the extent to which the effects of the Project hinder or contribute to BC and Canada’s environmental obligations and climate change commitments.
Concerns with the effects of the Project construction, operation, and associated marine shipping, contributing further to the cumulative effects from industrial activity on harvested marine resources throughout the Salish Sea.	The Impact Assessment will require the assessment of cumulative impacts from past, present, and reasonably foreseeable projects, in combination with potential residual effects resulting from DP4. The Impact Assessment will also require the assessment of greenhouse gas emissions, culture, and Indigenous Interests. GCT will continue to engage with Malahat Nation on these issues during the Project planning and assessment phase in the DPD, Section 7.8 and list of potential effects on Malahat Nations’ Indigenous Interests identified in the draft Joint Guidelines.
Concerns with the Project-based Impact Assessment process and exclusion of the current and ongoing cumulative impacts to Malahat Nation’s IK, cultural use, and occupancy across the territory and are instead limited to VCs within the Project boundaries.	The Impact Assessment will require the assessment of cumulative impacts from past, present, and reasonably foreseeable projects, in combination with potential residual effects resulting from DP4. GCT asked if an IK study was done for other projects in the area, and, if there are gaps remaining, expressed willingness to the Malahat Nation to support further IK, use and occupancy studies.
Concerns and questions about how Indigenous Knowledge feeds into the assessment process. Additional and updated research is also required because Indigenous Knowledge is inherently dynamic, evolving through ongoing observations and interactions with the land and waters. Malahat Nation requests contribution funding towards a territory-wide IK, use, and occupancy study encompassing community consultation with Knowledge Keepers and translation, to facilitate the effective and respectful weaving of IK throughout the assessment. The information will serve to inform the ongoing Project design, impact statement and impact assessment processes, including valued component (VC) selection, impact assessment methodology, mitigations and monitoring.	GCT understands that IK is holistic and provides valuable insights to the assessment, including the environmental, social, cultural, economic, health, resource use, and governance components of the assessment. Within the assessment, Malahat Nation IK will help inform the Project design, baseline data collection, and identification of: <ul style="list-style-type: none"> <li>• Valued Components (VCs)</li> <li>• Indicators and measures</li> <li>• Spatial and temporal boundaries</li> <li>• Potential mitigation measures</li> <li>• Follow-up and monitoring procedure</li> </ul>

**Table 47: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
(Cont'd.)	GCT will engage with Malahat Nation to develop Project related documents and processes that rely on both IK and western science. In cases where Indigenous nations have not yet completed studies for the Project area, GCT will support the development of nation-specific IK studies. GCT will engage with Malahat Nation to co-develop IK study terms of reference to provide direction on how IK and Indigenous views will inform the Impact Assessment and the Project. GCT has developed a draft Information Sharing Agreement for the purpose of maintaining confidentiality and respecting the protocols that Malahat Nation identifies. GCT agrees that improved accessibility to Indigenous Knowledge information and baseline contexts for proposed impacts to Malahat Nations' rights will allow more meaningful participation for the Malahat Nation. GCT will continue to work with Malahat Nation to support ongoing meaningful participation.
Concerns about impacts associated with incidental Project activities and interest in exploring GCT's proposed mitigation measures.	GCT acknowledges Malahat Nation's concerns related to potential impacts associated with incidental Project activities and the need to explore mitigation measures to address any impacts to Malahat Nation Interests. GCT continues to engage with Indigenous nations to provide information on how to determine the spatial scope of the Impact Assessment including factors to be considered. The geographic scope is ultimately determined by the IAAC and the BCEAO. GCT will continue to engage with Malahat Nation on this issue during the Project planning and assessment phase.

#### 8.4.12 Matsqui First Nation

This section describes GCT's engagement with Matsqui First Nation during the Early Engagement Phase. Detailed records of engagement activities, key interests and issues raised by Matsqui First Nation are provided in Table 48 and Table 49.

GCT has engaged with Matsqui First Nation by email, letter, and phone calls. GCT has asked Matsqui First Nation to specify their preferred methods of engagement. As engagement progresses, GCT is prepared to modify the methods of engagement should that be requested by Matsqui First Nation. In the meantime, GCT will continue to engage Matsqui First Nation through various methods.

GCT initiated engagement with Matsqui First Nation on February 25, 2020, via an introductory letter. On December 7, 2020, GCT and Matsqui First Nation had a phone call to discuss capacity funding options. GCT met with Matsqui First Nation twice in March to discuss the Project, and Matsqui First Nation's concerns and preferred engagement methods. Matsqui First Nation sent GCT comments on the IPD on May 26, 2021.

Matsqui First Nation has not submitted its notice to engage as a PIN to the BCEAO.

**Table 48: Summary of Key Engagement with Matsqui First Nation**

Dates	Subject	Interaction Type	Summary of Engagement
February 25, 2020	Introduction	Letter	<ul style="list-style-type: none"> <li>GCT informed Matsqui First Nation about the Project and requested input on the IPD and about Matsqui First Nation's engagement and participation preferences.</li> </ul>
March 18, 2020	Introduction	Conference Call	<ul style="list-style-type: none"> <li>GCT met with Matsqui First Nation to discuss the Project, capacity funding, communication preferences, and Matsqui First Nation's initial concerns about the Project, including effects on fish and water health.</li> </ul>
March 30, 2020	Governance Structure	Conference Call	<ul style="list-style-type: none"> <li>GCT discussed governance structures and decision-making processes with Matsqui First Nation.</li> </ul>
September 11, 2020	Capacity Funding	Email	<ul style="list-style-type: none"> <li>GCT informed Matsqui First Nation of the federal capacity funding program and offered to assist Matsqui First Nation with the application process.</li> </ul>
September 29, 2020	IPD	Email	<ul style="list-style-type: none"> <li>GCT provided an update on regulator approval of IPD.</li> </ul>
October 15, 2020	Comment Period	Email	<ul style="list-style-type: none"> <li>GCT informed Matsqui First Nation about the comment period for the IPD.</li> </ul>
November 2, 2020	Virtual Open Houses	Email	<ul style="list-style-type: none"> <li>GCT provided a reminder about the upcoming Virtual Open Houses.</li> </ul>
December 7, 2020	Capacity Funding	Phone call	<ul style="list-style-type: none"> <li>GCT discussed capacity funding options with Matsqui First Nation.</li> </ul>
February 10, 2021	Project Schedule	Email	<ul style="list-style-type: none"> <li>GCT provided a detailed Project schedule for Matsqui First Nation's review of the DPD and Joint Guidelines.</li> </ul>
February 17, 2021	DPD Update	Email	<ul style="list-style-type: none"> <li>GCT provided Matsqui First Nation with an update on the DPD schedule.</li> </ul>
April 7, 2021	Draft DPD Feedback Request	Email	<ul style="list-style-type: none"> <li>GCT sent Matsqui First Nation a copy of the draft DPD and requested feedback by May 7, 2021.</li> <li>GCT asked for a meeting to discuss the DPD, studies that Matsqui First Nation considers necessary in the review of the Project, and VCs.</li> </ul>
April 15, 2021	Draft DPD Follow up	Email	<ul style="list-style-type: none"> <li>GCT emailed Matsqui First Nation confirming receipt of the DPD and requesting that they provide feedback on the draft DPD by May 7, 2021, and to schedule a meeting.</li> </ul>

**Table 48: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
May 11, 2021	Workshop Request	Email	<ul style="list-style-type: none"> <li>GCT requested a workshop with Matsqui First Nation to discuss the following:               <ul style="list-style-type: none"> <li>Indigenous Interests</li> <li>VC selection</li> <li>Joint Guidelines.</li> </ul> </li> </ul>
May 26, 2021	IPD Comments	Email	<ul style="list-style-type: none"> <li>Matsqui First Nation sent GCT comments on the IPD.</li> </ul>

During early engagement, Matsqui First Nation raised various issues related to the Project. These issues, along with Indigenous Interests raised by Matsqui First Nation and the corresponding GCT responses, are summarized in Table 49.

**Table 49: Summary of Indigenous Interests and Issues Raised by Matsqui First Nation.**

Indigenous Interests and Issues Raised	GCT Response
Concern about the potential effects to fishing and harvesting rights.	The Impact Assessment is required to assess the potential Project impacts on marine resources, fish, fish habitat, marine resources, wildlife and Indigenous Interests. GCT will continue to engage Matsqui First Nation on this issue during the project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Matsqui First Nation’s Indigenous Interests identified in the draft Joint Guidelines.
Concern about the potential impacts to aquatic and marine environments and subsequent impacts on fishing.	The Impact Assessment is required to assess potential Project impacts on marine resources, fish, fish habitat, wildlife, and Indigenous Interests, including traditional use activities. GCT will continue to engage Matsqui First Nation on this issue during the project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Matsqui First Nation’s Indigenous Interests identified in the draft Joint Guidelines.
Questions about the differences between the RBT2 project and the Project.	GCT provided information and available studies outlining the differences between the two projects, and provide information on key differences between the two projects including: <ul style="list-style-type: none"> <li>the Project has a smaller footprint than RBT2 and thus potentially less environmental impacts;</li> <li>GCT has the financial capability to build the project without risk to taxpayers; and</li> <li>by default, DP4 has a terminal operator and customers which RBT2 does not.</li> </ul>

**Table 49: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>Concerns that the Project’s facilitation of continued industrial growth is not consistent with its stated goal of sustainability. Short-term goals of more jobs and greater profits ignore the widespread and irreparable harm resulting from such pursuits. Importing more goods from offshore manufacturers or exporting more domestic goods to distant markets ignores the social, economic, and environmental costs of such a system.</p>	<p>GCT acknowledges Matsqui First Nation's concerns and notes for the larger context that GCT does not set Canada’s trade policy. GCT is in the business of responding to trade demands and servicing Canada’s importers and exporters. While doing so, GCT is focused on providing those services in the most sustainable way. Please find out more about our Global Commitment. <a href="https://globalterminals.com/globalcommitment/">https://globalterminals.com/globalcommitment/</a></p>
<p>Request that an analysis of a “no-project alternative” should be included in the assessment to highlight the absence of impacts and potential benefits resulting from not pursuing increased container shipping.</p>	<p>GCT will complete a no-project alternative analysis as a part of the Impact Assessment.</p>
<p>Concerns about increased rail traffic passing through Matsqui First Nation reserve since this adversely impacts the health of community members, enjoyment of Mother Earth, ability to use Matsqui First Nation land today and seven generations in the future, access to the river and ability to respond to emergencies.</p>	<p>Projected growth in train activity in the eastern part (Abbotsford) of the RB trade area is not expected to change significantly because the rail line (SRY line &amp; CP line) is connected to but, not part of the main RBRC rail line that is anticipated to handle all of the existing and proposed container train traffic.</p> <p>The Impact Assessment is required to assess the potential for risks and response to malfunctions and accidents as well as effects of the Project on human health, marine and land use, marine resources, and Indigenous Interests. GCT will continue to engage with Matsqui First Nation on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 of the DPD and list of potential effects on Matsqui First Nation’s Indigenous Interests identified in the draft Joint Guidelines.</p>
<p>Concerns about the impacts of increased traffic in the western trade corridors and the management of health effects due to increased traffic.</p>	<p>The Impact Assessment is required to assess potential Project impacts of the Project on human health, marine use, and marine navigation. GCT will continue to engage with Matsqui First Nation on this issue during the Project planning and assessment phase.</p>
<p>Concerns about GCT delegating responsibility for mitigating truck and rail traffic impacts. Requests that GCT take full responsibility for mitigating impacts for truck traffic including increased congestion and traffic safety risks.</p>	<p>GCT acknowledges Matsqui First Nation’s concerns related to potential impacts associated with road and rail activities and is evaluating options to assess these activities as part of the Impact Assessment, since they are incidental activities outside of GCT’s care and control.</p>

**Table 49: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
(Cont'd.)	<p>GCT is already collaborating with municipal governments, Indigenous nations, BC Ministry of Transport and Infrastructure, and the rail companies, amongst others, through the Gateway Transportation Collaboration Forum to confirm any improvements that may be required to the network as a result of the proposed container terminal expansion projects at Roberts Bank.</p> <p>Under the funding agreement, the governments of Canada and British Columbia, the Tsawwassen First Nation, and the VFPA pre-funding on behalf of the industry, are collectively contributing up to CAD 245 million for a suite of projects including Deltaport Way/27B Avenue Improvements; Highway 17 at 80th Street (Tilbury) Intersection Upgrade; Highway 91 Connector/ Highway 17/River Road (Sunbury) Interchange; Highway 91 Connector/ Nordel Way Intersection; Highway 91/Nordel Way Interchange. Of this, the federal government will contribute up to a maximum of CAD 82 million for this project. The Government of British Columbia is contributing approximately CAD 80 million. The Tsawwassen First Nation is contributing CAD 5.2 million. The VFPA is contributing ~CAD 8 million and the remaining ~CAD 70 million is a contribution from the industry, including GCT and its customers, via the Gateway Infrastructure Fee.</p> <p>GCT will continue to engage with Matsqui First Nation on this issue during the Project planning and assessment phase.</p>
<p>Contribution of ships, port operations, trains, and trucks to greenhouse gas, particulate, and pollutant emissions, and resulting impacts on ambient air quality and local air quality, particularly on Matsqui First Nation main reserve. Requests the assessment of emissions related to the Project and its impacts.</p>	<p>The Impact Assessment is required to assess potential Project impacts on air quality. GCT is committed to reducing and avoiding GHG emissions where possible throughout the advancement of the Project. The Impact Assessment will describe the Project's contribution to the best achievable technologies to mitigate GHG emissions from the Project. The factors to be considered in the Impact Assessment, and the scope of those factors will be described in the Project Joint Guidelines. The IAAC and BCEAO will engage with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuance of the final Joint Guidelines. GCT will continue to engage with Matsqui First Nation on this issue during the project planning and assessment phase.</p>
<p>Concerns about the impacts of increased ship traffic (specifically freight traffic in the Georgia Strait and the Strait of Juan de Fuca) and the proposed fishing boat marina included in the Project, on whales, salmon, birds, crabs, and other marine life that are important to Matsqui First Nation.</p>	<p>The Impact Assessment is required to assess potential Project impacts on wildlife, marine resources, fish, and Indigenous Interests. GCT will continue to engage with Matsqui First Nation on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Matsqui First Nations' Indigenous Interests identified in the draft Joint Guidelines.</p>

**Table 49: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>Concerns about GCT jeopardizing the legitimacy of the Impact Assessment and approval process by scheduling permitting activities before the Impact Assessment is complete.</p>	<p>Initiation of the permitting process prior to the approval of an EA is permitted by both Provincial and Federal Authorities. Permits are issued only after the issuance of an Impact Assessment certificate and GCT will comply with all regulatory requirements throughout the Impact Assessment process.</p>
<p>Requests that the cumulative effects assessment should include all development that has affected the study area, including the Fraser Valley, since European settlement accelerated in the 1860s. Matsqui First Nation requests to review the scope for the cumulative effects assessment.</p>	<p>The Impact Assessment is required to assess potential cumulative impacts. To assess the cumulative effects on a given VC, the Project residual effects will be assessed in combination with the potential effects of other past, present and reasonably foreseeable projects (projects that are either proposed or have been approved to be built but are not yet built). The factors to be considered, and the scope of those factors, will be described in the Project Joint Guidelines. The IAAC and BCEAO will engage with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuance of the final Joint Guidelines.</p>
<p>Concerns that the permits and approval process fail to identify any First Nation's laws or permits.</p>	<p>GCT will continue to engage with Matsqui First Nation to better understand Matsqui First Nation's laws and where required how to apply for Matsqui First Nation permits. GCT will have similar discussions with other Indigenous nations regarding their laws and permitting processes as applicable.</p>
<p>Questions and concerns about the volumes, character, and use or disposal of dredge material removed from the estimated 30 ha area of affected seabed.</p>	<p>GCT's technical personnel will engage with Matsqui First Nation to identify specific areas where gaps exist, and where further information and studies are required.</p>
<p>Concerns about the Project activity causing damage to the dendritic channels. Those channels are maintaining the geohydraulic and ecosystem health of the project area Request that the impact assessment contain a full discussion of the value and role of dendritic channels and the biophysical implications of their disruption.</p>	<p>GCT acknowledges Matsqui First Nation's concerns related to changes to coastal geomorphology and dendritic channels, GCT has and will continue to assess through engineering design and the Impact Assessment. Based on regulatory requirements and engagement with First Nations, GCT is drafting Joint Guidelines to define the Project assessment scope. After we provide the draft Joint Guidelines to BC EAO and IAAC, they will consult with Matsqui and determine the final scope. GCT will also continue to engage with Matsqui First Nation.</p>
<p>Concerns about the several major interchange and road construction initiatives necessary for the operation of the proposed project and its effect on vehicle use, fuel consumption, emissions, aesthetic degradation, crashes, impervious surface, and urban sprawl. Request that these transportation features be subject to a thorough environmental and socioeconomic assessment.</p>	<p>GCT acknowledges Matsqui First Nation's concerns related to potential impacts associated with road and rail activities and is evaluating options to assess these activities as part of the Project assessment, since they are incidental activities and outside of GCT's care and control. Based on regulatory requirements and engagement with First Nations, GCT is drafting Joint Guidelines to define the Project assessment scope. After we provide the draft Joint Guidelines to BC EAO and IAAC, they will consult with Matsqui First Nation and determine the final scope. GCT will also continue to engage with Matsqui First Nation.</p>



**Table 49: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
Request that GCT commits to studying Matsqui First Nation’s Land Use Plan and Environmental Management Plan, which provide context for assessing project impacts on Mόμεqwe and our community.	GCT acknowledges Matsqui First Nation's request for GCT to review Matsqui First Nations’ Land Use Plan and Environmental Management Plan. As part of the Impact Assessment, GCT will review both plans and address issues that are applicable to the Project.
Concerns that the cumulative effects assessment and mitigation measures for cumulative effects are inadequate. Greater emphasis should be placed on the terrestrial cumulative effects. Request that the mitigation measures be expanded, and their potential effectiveness more fully assessed.	GCT acknowledges Matsqui First Nation's concern about cumulative effects. The mitigations within the DPD are just an initial list ahead of the Impact Assessment. Through the Impact Assessment comprehensive mitigations will be developed, including in relation to cumulative effects.  Based on regulatory requirements and engagement with Indigenous nations, GCT is drafting Joint Guidelines to define the Project assessment scope, including cumulative effects. After GCT provides the draft Joint Guidelines to BC EAO and IAAC, they will consult Matsqui First Nation and determine the final scope of the cumulative impact assessment.
Concerns about the inadequacy of mitigation plans. Matsqui First Nation expects GCT to commit to actions specified in the impact assessment.	GCT will define mitigations within the Impact Assessment with clear commitments for their implementation. Management plans are a tool to define, manage and enable compliance monitoring and auditing of these mitigations.
Concerns about train derailments and truck-related traffic accidents.	The Impact Assessment is required to assess the potential for malfunctions and accidents. GCT is planning a risk-based approach for the assessment of malfunctions and accidents. GCT will continue to engage with Matsqui First Nation on this issue during the project planning and assessment phase.

### 8.4.13 Métis Nation British Columbia

This section describes GCT’s engagement with Métis Nation British Columbia during the Early Engagement Phase. Detailed records of engagement activities with Métis Nation British Columbia are provided in Table 50.

GCT has engaged with Métis Nation British Columbia by email, phone calls, letter, and a meeting. GCT has asked Métis Nation British Columbia to specify their preferred methods of engagement. As engagement progresses, GCT is prepared to modify the methods of engagement should that be requested by Métis Nation British Columbia. In the meantime, GCT will continue to engage Métis Nation British Columbia through various methods.

GCT initiated engagement with Métis Nation British Columbia via letter on February 25, 2020, and requested a meeting to discuss the Project. GCT and Métis Nation British Columbia met over the phone to discuss capacity funding in October 2020. On March 24, 2020, GCT met with Métis Nation British Columbia to discuss the draft DPD, VCs and studies for the Impact Assessment. GCT met with Métis Nation British Columbia on June 1, 2021, to discuss the draft DPD, VC selection, Indigenous Interests, and draft Joint Guidelines.

Métis Nation British Columbia has not submitted their notice to engage as a PIN to the BCEAO.

**Table 50: Summary of Key Engagement with Métis Nation British Columbia.**

Dates	Subject	Interaction Type	Summary of Engagement
February 25, 2020	Introduction	Letter	<ul style="list-style-type: none"> <li>GCT informed Métis Nation British Columbia about the Project and requested input on the IPD and about Métis Nation British Columbia engagement and participation preferences</li> </ul>
March 4, 2020	Meeting Request	Phone Call	<ul style="list-style-type: none"> <li>GCT contacted Métis Nation British Columbia to request a meeting.</li> </ul>
March 20, 2020	Meeting Request	Email	<ul style="list-style-type: none"> <li>Métis Nation British Columbia contacted GCT to confirm receipt of the letter it sent on March 1, 2020. Métis Nation British Columbia also requested additional information about the Project and requested a meeting.</li> </ul>
April 7, 2020	Introduction	Email	<ul style="list-style-type: none"> <li>GCT provided Métis Nation British Columbia with links and a presentation containing background information about the Project.</li> </ul>
September 11, 2021	Capacity Funding	Email	<ul style="list-style-type: none"> <li>GCT provided Métis Nation of British Columbia with links and a presentation containing background information about the Project.</li> </ul>
September 14, 2020	Introduction	Phone Call	<ul style="list-style-type: none"> <li>GCT contacted Métis Nation British Columbia to discuss the Project and provide a briefing. Métis Nation British Columbia requested additional information.</li> </ul>
September 15, 2020	Introduction	Email	<ul style="list-style-type: none"> <li>GCT provided Métis Nation British Columbia with the information requested on September 14, 2020.</li> </ul>
September 15, 2021	Capacity Funding	Email	<ul style="list-style-type: none"> <li>Métis Nation of British Columbia emailed GCT indicating an interest in capacity funding.</li> </ul>
September 29, 2020	IPD	Email	<ul style="list-style-type: none"> <li>GCT provided an update on regulator approval of IPD.</li> </ul>
October 15, 2020	Comment Period	Email	<ul style="list-style-type: none"> <li>GCT informed Métis Nation British Columbia about the comment period on the IPD.</li> </ul>
October 26, 2021	Capacity Funding	Call	<ul style="list-style-type: none"> <li>GCT discussed capacity funding with Métis Nation of British Columbia</li> </ul>
November 2, 2020	Virtual Open House	Email	<ul style="list-style-type: none"> <li>GCT informed Métis Nation British Columbia of upcoming virtual open houses.</li> </ul>

**Table 50: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
December 9, 2020	Follow-Up	Email	<ul style="list-style-type: none"> <li>GCT asked about Métis Nation British Columbia's potential involvement in the Project.</li> </ul>
December 10, 2020	Project Involvement	Email	<ul style="list-style-type: none"> <li>Métis Nation British Columbia informed GCT to follow up in January.</li> </ul>
February 10, 2021	Project Schedule	Email	<ul style="list-style-type: none"> <li>GCT provided a detailed Project schedule for Metis Nation British Columbia's review of the DPD and Joint Guidelines.</li> </ul>
February 17, 2021	DPD Update	Email	<ul style="list-style-type: none"> <li>GCT informed Métis Nation British Columbia of the DPD update.</li> </ul>
February 18, 2021	New Contact	Email	<ul style="list-style-type: none"> <li>Métis Nation British Columbia informed GCT of a new contact person.</li> </ul>
March 4, 2021	Introduction	Phone Call	<ul style="list-style-type: none"> <li>GCT had an introductory phone call with the new contact person for Métis Nation British Columbia.</li> </ul>
March 24, 2021	Project Introduction	Meeting	<ul style="list-style-type: none"> <li>GCT met with Métis Nation British Columbia to introduce the Project and discuss initial questions and feedback.</li> </ul>
April 7, 2021	Draft DPD Feedback Request	Email	<ul style="list-style-type: none"> <li>GCT sent Métis Nation British Columbia a copy of the draft DPD and requested feedback by May 7, 2021.</li> <li>GCT asked for a meeting to discuss the DPD, studies that Métis Nation British Columbia considers necessary in the review of the Project, and VCs.</li> </ul>
April 15, 2021	Draft DPD Follow up	Email	<ul style="list-style-type: none"> <li>GCT emailed Metis Nation British Columbia confirming receipt of the DPD and requesting that they provide feedback on the draft DPD by May 7, 2021, and to schedule a meeting.</li> </ul>
May 7, 2021	Workshop Request	Email	<ul style="list-style-type: none"> <li>GCT requested a workshop with Métis Nation British Columbia to discuss the following:               <ul style="list-style-type: none"> <li>DPD feedback</li> <li>Indigenous Interests</li> <li>VC selection</li> <li>Joint Guidelines.</li> </ul> </li> </ul>
May 12, 2021	DPD Comments	Email	<ul style="list-style-type: none"> <li>Métis Nation British Columbia updated GCT on DPD comments status.</li> </ul>
May 14, 2021	Workshop Dates	Email	<ul style="list-style-type: none"> <li>GCT proposed a time, date, and agenda for the workshop.</li> </ul>

**Table 50: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
June 1, 2021	Project Updates Meeting	Meeting	<ul style="list-style-type: none"> <li>GCT met with Métis Nation British Columbia to discuss the following:               <ul style="list-style-type: none"> <li>Project Updates</li> <li>VC selection</li> <li>Indigenous Interests.</li> </ul> </li> <li>Métis Nation British Columbia raised issues regarding the Fraser River, RBT2 baseline studies, and Indigenous Knowledge use.</li> </ul>

Métis Nation British Columbia raised the following issues relating to the Project during early engagement. These issues, along with GCT responses are summarized in Table 51.

**Table 51: Summary of Indigenous Interests and Issues Raised by Métis Nation British Columbia.**

Indigenous Interests and Issues Raised	GCT Response
Concern about the impact of Project on the Fraser River waterway and Roberts Bank area. The Fraser River and Fraser River delta should be included in the various study areas, to the extent of it making sense to potentially affected species.	GCT appreciates the Métis Nation's concerns about the Fraser River and the importance of the Lower Fraser River and Roberts Bank is acknowledged in the DPD. Based on regulatory requirements and engagement with Indigenous nations, GCT is drafting Joint Guidelines to define the Project assessment scope, including spatial boundaries. After GCT provides the draft Joint Guidelines to BC EAO and IAAC, they will consult Métis Nation and determine the final scope.
Request for the inclusion of Indigenous Knowledge from Elders for use in developing the environmental baseline and identifying opportunities for habitat enhancement/species recovery. For example, completing studies to facilitate eulachon recovery with input from Elders and other community members.	GCT would welcome the opportunity to incorporate discussions with Elders and other community members into the assessment process, as that will help to bring perspective to these issues. GCT also wants to discuss the Indigenous Knowledge agreement and acknowledge the protocols in doing that and making connections and gather the information and then how it is used.

#### 8.4.14 Musqueam Indian Band

This section describes GCT’s engagement with Musqueam Indian Band during the Early Engagement Phase and includes information regarding their notice to engage as a PIN. Detailed records of engagement activities, key interests and issues raised by the Musqueam Indian Band are provided in Table 52 and Table 53.

GCT has engaged with Musqueam Indian Band with letters, emails, phone calls, an in-person visit and a conference call. GCT has requested Musqueam Indian Band identify their preferred methods of engagement for the Project. As engagement progresses, GCT is prepared to modify the methods of engagement should that be requested by Musqueam Indian Band. In the meantime, GCT will continue to engage Musqueam Indian Band through various methods.

GCT initiated engagement with Musqueam Indian Band in February 2019, with a presentation of the Preliminary Project Enquiry document to a member of the Council. This was followed by a number of phone calls and emails, including engagement at events and offers of a tour at GCT Deltaport throughout 2019. Subsequently, GCT wrote to Musqueam on February 21, 2020, to offer to pre-engage on the IPD submission. On March 17, 2021, GCT met with Musqueam Indian Band to provide a presentation on the Project and discuss updates to the Application process, future engagement activities, IK studies, and VC selection. GCT met with Musqueam Indian Band in June 2021 to discuss capacity funding, updates to the draft DPD, VCs, the Joint Guidelines and Musqueam Indian Band’s Indigenous Interests. On June 11, 2021, GCT provided Musqueam Indian Band with the draft Capacity Funding Agreement for their review and feedback.

Musqueam Indian Band submitted their notice to engage as a PIN to the BCEAO on December 17, 2020. In their notice, Musqueam Indian Band stated that they are priority title holders within the Project area and stand to be among the most heavily impacted by the Project. Musqueam Indian Band stated that they are concerned about the Project’s effects on their fishing rights and interests related to a sense of place, cultural continuity, human health, and governance role. Musqueam Indian Band requested that the Musqueam Indian Band’s rights and title and the impact to those rights and title, be considered within the context of the Supreme Court of Canada decision in R. v. Sparrow [1990] 1 SCR 1075 (the Sparrow decision).

**Table 52: Summary of Key Engagement with Musqueam Indian Band.**

Dates	Subject	Interaction Type	Summary of Engagement
February 25, 2019	Introduction	Meeting	<ul style="list-style-type: none"> <li>GCT met with a designated representative of the elected Council Musqueam Indian Band and introduced the Project.</li> </ul>
April 12, 2019	Meeting Request	Email	<ul style="list-style-type: none"> <li>GCT requested a meeting with Musqueam Indian Band.</li> </ul>
May 6, 2019	Terminal tour arrangements	Email	<ul style="list-style-type: none"> <li>GCT offered a tour of GCT Deltaport terminal in follow up to discussion with Musqueam Indian Band Capital Corporation.</li> </ul>
December 4, 2019	Project Update	Email	<ul style="list-style-type: none"> <li>GCT provided an update to Musqueam Indian Band about Roberts Bank terminal expansions. GCT also provided Musqueam Indian Band with an invite to the UNDRIP 2020 Conference.</li> </ul>
February 21, 2020	Engagement Request	Letter	<ul style="list-style-type: none"> <li>GCT proposed a meeting with Musqueam leadership to discuss DP4 preliminary work, obtain advice/feedback on the proposal and offer of facility tour.</li> </ul>
April 27, 2020	Meeting Request	Email	<ul style="list-style-type: none"> <li>GCT requested a meeting with Musqueam Indian Band.</li> </ul>
October 29, 2020	IPD – Milestone update	Letter	<ul style="list-style-type: none"> <li>GCT notified Musqueam Indian Band about its submission of the IPD, requested comments on the IPD, and invited Musqueam Indian Band to participate in upcoming virtual sessions.</li> </ul>

**Table 52: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
January 14, 2021	Chief to CEO meeting	Video Call	<ul style="list-style-type: none"> <li>Introduction of GCT to Chief Sparrow, an overview of the project and investments in the region, seeking guidance on how best to engage further and more meaningfully.</li> </ul>
January 19, 2021	Introduction	Email	<ul style="list-style-type: none"> <li>GCT contacted the Musqueam Indian Band administration to re-introduce the GCT team and discuss GCT's approach to engagement.</li> </ul>
January 27, 2021	Scheduling	Email	<ul style="list-style-type: none"> <li>Musqueam Indian Band responded to GCT and requested a virtual meeting to discuss the Project and engagement preferences.</li> </ul>
February 8, 2021	Scheduling	Email	<ul style="list-style-type: none"> <li>GCT requested a meeting with Musqueam Indian Band.</li> </ul>
March 17, 2021	Project Overview, VCs and Impact Assessment Studies	Video Call	<ul style="list-style-type: none"> <li>GCT met with Musqueam Indian Band to provide a presentation on the Project and Project updates, engagement, Impact Assessment studies, and VCs.</li> </ul>
April 7, 2021	Draft DPD Feedback Request	Email	<ul style="list-style-type: none"> <li>GCT sent Musqueam Indian Band a copy of the draft DPD and requested feedback by May 7, 2021.</li> <li>GCT asked for a meeting to discuss the DPD, studies that Musqueam Indian Band considers necessary in the review of the Project, and VCs.</li> </ul>
June 4, 2021	Draft DPD Comments	Email	<ul style="list-style-type: none"> <li>Musqueam Indian Band sent GCT their draft DPD comments, noting they anticipate working with GCT to identify, avoid, and mitigate any potential impacts.</li> </ul>
June 11, 2021	Capacity Funding Agreement	Email	<ul style="list-style-type: none"> <li>GCT sent Musqueam Indian Band the draft Capacity Funding Agreement for their review and feedback.</li> </ul>
July 8, 2021	VCs and Indigenous Interests Workshop	Meeting	<ul style="list-style-type: none"> <li>GCT met with Musqueam Indian Band to discuss: <ul style="list-style-type: none"> <li>Project update</li> <li>Progress and refinement of VC selection</li> <li>Preliminary understanding of Musqueam Indian Band's Indigenous Interests potential project effects</li> </ul> </li> <li>Musqueam Indian Band identified issues and concerns and GCT responses to Musqueam Indian Band comments on the revised DPD.</li> </ul>

Musqueam Indian Band raised the following issues relating to the Project during early engagement. These issues, along with GCT responses are summarized in Table 53.

**Table 53: Summary of Indigenous Interests and Issues Raised by Musqueam Indian Band.**

Indigenous Interests and Issues Raised	GCT Response
<p>The Project area is a historical and contemporary preferred fishing area that cannot be substituted. Therefore, the Project interferes with Musqueam Indian Band’s constitutionally protected right to harvest fish to meet its FSC and economic requirements. The assessment must assess the potential impacts on these sites or Musqueam Indian Band’s ability to access them for traditional or rights-based purposes.</p>	<p>The Impact Assessment is required to assess potential Project effects on marine resources, fish, wildlife, physical and cultural heritage, and Indigenous Interests, including traditional use activities. GCT will continue to engage with Musqueam Indian Band on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Musqueam Indian Bands’ Indigenous Interests identified in the draft Joint Guidelines.</p>
<p>Concerns about the effects on Musqueam Indian Band’s historical use and control of the Fraser River as recognized in the 1990 R. v. Sparrow decision. The Project has a high potential to impact Musqueam Indian Band’s proven Sparrow fishing right, which has been affirmed by s.35 of the Constitution and recognized by the Supreme Court of Canada. The relevant test in the Sparrow decision requires infringements to be justified.</p>	<p>The Impact Assessment is required to assess potential Project effects on marine resources, fish, wildlife and Indigenous Interests, including traditional use activities. GCT will continue to engage with Musqueam Indian Band on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Musqueam Indian Bands’ Indigenous Interests identified in the draft Joint Guidelines.</p>
<p>Concerns with the potential Project interactions with the Musqueam Indian Band’s sense of place and identity, including:</p> <ul style="list-style-type: none"> <li>• Increased disruption of Musqueam Indian Band’s members’ sense of place as a result of changes to valued places and place characteristics from increases in marine traffic, noise disturbances, and ecological changes.</li> <li>• Disruption of Musqueam Indian Band identities and increased disconnection from Musqueam Indian Band’s cultural heritage due to direct and indirect Project effects on fishing, ceremonies, gatherings, and consumption of traditional foods, and other cultural practices.</li> <li>• Increased psychological and emotional stress from uncertainty over Project effects, including reduced safety from marine traffic, disruptions to fishing, accident and spill potential.</li> </ul>	<p>The Impact Assessment is required to assess potential Project effects on Indigenous Interests and physical and cultural heritage. GCT will continue to engage with Musqueam Indian Band on this issue during Project planning and assessment phase, including on how the preliminary list of potential effects on Indigenous Interests identified in the Joint Guidelines can incorporate effects on areas of high archaeological potential and use of cultural places.</p>

**Table 53: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>(Cont'd.)</p> <ul style="list-style-type: none"> <li>Increased disruption to the protection, persistence, and living of Musqueam šxʷtəhiṁ (i.e., ways, manners, and customs) and snəwəyət (i.e., teachings received since childhood, including identity and responsibilities) as a result of Project construction and operations.</li> </ul>	<p>(Cont'd.)</p>
<p>Increased interruptions to knowledge transmission and lost opportunities to transmit knowledge due to the loss of access and quality of access to the area. If changes in the area lead to gaps in knowledge, effects may persist over generations.</p>	<p>The Impact Assessment is required to assess potential Project effects on physical and cultural heritage and indigenous Interests, including cultural continuation. GCT will continue to engage with Musqueam Indian Band on this issue during Project planning and assessment phase, including on how the preliminary list of potential effects on Indigenous Interests identified in the Joint Guidelines can incorporate effects on areas of high archaeological potential and use of cultural places.</p>
<p>Compounding effects of industrial development projects, urbanization, and environmental stressors on the resources, lands, and waters in the vicinity of the Project.</p>	<p>The Impact Assessment will require the assessment of cumulative effects from past, present, and reasonably foreseeable projects, in combination with potential residual effects resulting from DP4. The Impact Assessment will also assess potential effects on the environment, which includes resources, lands and waters.</p>
<p>Rapid environmental change caused by Project activities, rendering Musqueam Knowledge outdated.</p>	<p>The Impact Assessment is required to assess potential Project effects on marine resources, fish, wildlife and Indigenous Interests, including traditional use activities and cultural continuation. GCT will continue to engage with Musqueam Indian Band on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Musqueam Indian Bands' Indigenous Interests identified in the draft Joint Guidelines.</p>
<p>Avoidance of the area as a result of increases in marine traffic, hydrological and ecological changes, and noise disturbances.</p>	<p>The Impact Assessment is required to assess potential Project effects on physical and cultural heritage. GCT will continue to engage with Musqueam Indian Band on this issue during Project planning and assessment phase, including on how the preliminary list of potential effects on Indigenous Interests identified in the Joint Guidelines can incorporate effects on areas of high archaeological potential and use of cultural places.</p>



**Table 53: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>Project restrictions that reduce Musqueam members' abilities to freely access preferred resources and waters in the area.</p>	<p>The Impact Assessment is required to assess potential impacts to marine use and marine navigation from the Project. GCT will continue to engage with Musqueam Indian Band on this issue during the Project planning and assessment phase.</p>
<p>Musqueam Indian Band stands to be among the most heavily impacted by the Project. Musqueam Indian Band has concerns about impacts and permanent loss of cultural heritage sites due to Project construction and operation, since the Project site is near some of Musqueam Indian Band's most sacred, spiritually relevant and culturally significant sites. These sites are considered by many Musqueam Indian Band members, alongside over 125 other named sites, to form a network in the region, critical to Musqueam Indian Band's cultural continuity. Musqueam Indian Band's location at the mouth of the Fraser River Delta is deeply entwined with Musqueam Indian Band oral histories and cultural identity. Musqueam Indian Band territorial claims to this area are firmly established.</p>	<p>The Impact Assessment is required to assess potential Project effects on physical and cultural heritage. GCT acknowledges Musqueam Indian Band's Title and Rights as set out in the Musqueam Declaration (1976), the Statement of Intent filed with the BC Treaty Commission, and in Supreme Court of Canada decisions such as Sparrow and Guerin. When finalized by IAAC and BCEAO, the Joint Guidelines will establish the requirements for assessing effects on Musqueam Indian Band's Indigenous Interests. GCT will continue to engage with Musqueam Indian Band on this issue during Project planning and assessment phase, including on how the preliminary list of potential effects on Indigenous Interests identified in the Joint Guidelines can incorporate effects on areas of high archaeological potential and use of cultural places.</p>
<p>Shellfish contamination, including the contamination of crab, a traditional food source.</p>	<p>The Impact Assessment is required to assess potential Project effects on marine resources, fish, wildlife and Indigenous Interests. GCT will continue to engage with Musqueam Indian Band on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Musqueam Indian Bands' Indigenous Interests identified in the draft Joint Guidelines.</p>
<p>Concerns about the Project's effects on human health. The effects pathways for human health include impacts to members' ability to exercise their rights to use the Fraser River and the Salish Sea for fishing, travel and harvesting, and the subsequent adverse effects to food security, cultural continuity and sense of place and identity. A Musqueam-specific analysis is required to effectively captures these impacts from the Project and to mitigate these impact pathways.</p>	<p>The Impact Assessment is required to assess potential Project effects on human health, marine use, marine navigation, and Indigenous Interests, including traditional use activities. GCT will continue to engage with Musqueam Indian Band on this issue during the Project planning and assessment phase including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Musqueam Indian Band's Indigenous Interests identified in the draft Joint Guidelines.</p>

**Table 53: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>Concerns about adding to the cumulative effects of other projects in the area, including increases in harmful air emissions, sensory disturbances, and safety risks due to increased traffic.</p>	<p>The Impact Assessment will require the assessment of cumulative effects from past, present, and reasonably foreseeable projects, in combination with potential residual effects resulting from DP4. The Impact Assessment will also consider air emissions, sensory disturbance, and risks to human health and safety.</p>
<p>Increased disruption to the protection, persistence, and living of Musqueam ʔxʷtəhíḥ (i.e., ways, manners, and customs) and snəwəyət (i.e., teachings received since childhood, including identity and responsibilities) as a result of Project construction and operations.</p>	<p>The Impact Assessment is required to assess the potential Project effects on physical and cultural heritage and Indigenous Interests, including cultural continuation. GCT will continue to engage with Musqueam Indian Band on this issue during Project planning and Assessment phase, including on how the preliminary list of potential effects on Indigenous Interests identified in the Joint Guidelines can incorporate effects on areas of high archaeological potential and use of cultural places.</p>
<p>A loss of fish or access to fish resources in one season can lead to economic impacts for Musqueam fishers who rely on the resource for economic wellbeing. Any alteration is deeply troubling, as we are certain you can appreciate, not all salmon runs are available every year so a loss of access in one year can thus have a multiyear effect.</p>	<p>The Impact Assessment is required to assess potential Project effects on marine use, marine navigation, and Indigenous interests. GCT will continue to engage with Musqueam Indian Band on this issue during the Project planning and Impact Assessment phase, including on how the preliminary list of potential effects on Indigenous Interests identified in the Joint Guidelines can incorporate effects on areas of high archaeological potential and use of cultural places.</p>
<p>Concerns about the impacts of increased frequency of vessel traffic, the larger sizes of vessels and short sea shipping. For many Musqueam Indian Band members who travel and fish on the Fraser River, more marine traffic and larger vessels mean increased stressors and greater concerns over safety. During short fishing windows, increased vessel traffic on the river can lead to more frequent, dangerous interactions, decreasing the ability and desire to engage in traditional fishing practices. It is important that Musqueam Indian Band can safely undertake these activities with Musqueam youth, which could be more difficult with an even greater number of even larger vessels in the area. Please provide a detailed analysis of the amount of vessels, impacts of the proposed short sea shipping berth and how impacts on Musqueam Indian Band will be avoided and mitigated.</p>	<p>The Impact Assessment is required to assess potential Project effects on marine use, marine navigation, and Indigenous Interests. GCT is pursuing a Project design that accommodates a short sea shipping berth to accommodate future market demand and in anticipation that governments may mandate alternatives to trucking in the future, or dynamics in the market may change. To GCT’s knowledge, only two examples of short sea shipping exist in the region, and no other short sea shipping services are currently being planned outside of GCT Deltaport. As such, it is not possible at this stage to ascertain if, when or where such facilities outside of GCT Deltaport would be constructed. It is similarly not feasible to make predictions about the volumes of marine traffic associated with short sea shipping, or shipping routes, which are not clearly defined unlike shipping routes for traditional container vessels (which GCT will be assessing, along with potential impacts associated with the construction of the short sea shipping berth). Nevertheless, GCT is committed to ongoing dialogue with Musqueam Indian Band as opportunities to meet short sea shipping advances.</p>

**Table 53: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>Concerns about the Project effects on crab harvesting as the Project footprint overlaps with an important crab harvesting area that is already being threatened by development. Musqueam Indian Band relies on crab as an important traditional food source.</p>	<p>The Impact Assessment is required to assess potential Project effects on wildlife, marine use, and Indigenous Interests, including traditional practices. GCT will continue to engage with Musqueam Indian Band on this issue during the Project planning and Impact Assessment phase including on the preliminary list of potential effects on Indigenous Interests identified in Section 7.8 of the DPD.</p>
<p>Concerns about the related impacts of marine shipping, including the effects of noise and vibration, on species that are culturally and socioeconomically significant to Musqueam Indian Band, including Dungeness Crab, White Sturgeon, Orca, Southern Resident Killer Whales and species of salmon and waterfowl. The ecosystems of Roberts Bank and the surrounding area provide essential habitat and migratory routes for a variety of these species. These species are important to Musqueam's cultural continuity, sense of place and identity and intergenerational knowledge transfer. It is critical that the assessment assess the direct and indirect Project impacts on these species. GCT should explore the option for increasing ecosystem connectivity in the area.</p>	<p>The Impact Assessment is required to assess potential Project effects on marine resources, fish, wildlife and Indigenous Interests, including traditional use activities. Effects on fish, fishing, and traditional foods are also likely topics for inclusion in the Project's assessment of potential effects to VCs. Section 7.8 of the DPD identifies the preliminary potential Project effects on Indigenous Interests, such as harvesting and subsistence activities, which includes the right to harvest for Food, Social, and Ceremonial purposes, effects on historical and contemporary harvesting sites and accessibility of culturally important harvesting sites, change in abundance, distribution or quality of resources, and current and future availability, quality and quantity of foods.</p> <p>GCT acknowledges the importance of ecosystem connectivity and expects to consider it within the Impact Assessment and in the determination of habitat offsetting opportunities. The Impact Assessment will adhere to federal and provincial commitments related to fish and fish habitat in the Fraser River. GCT will continue to engage with Musqueam Indian Band on this issue during the project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Musqueam Indian Band's Indigenous Interests identified in the draft Joint Guidelines.</p>
<p>It is important that the studies undertaken by GCT have a long enough temporal scope to capture baseline conditions that reflect the existing cumulative impacts on Musqueam Indian Band's territory and interests. Musqueam's territory and ability to exercise rights have already been significantly impacted by industrialization and development. It is necessary to understand existing cumulative effects, as they amplify the significance of further impacts.</p>	<p>The Impact Assessment is required to assess potential cumulative effects from reasonably anticipated future projects in combination with residual Project effects. To assess the cumulative effects on a given VC, the residual effects of the Project will be assessed in combination with the potential effects of other reasonably foreseeable projects (projects that are either proposed (public disclosure) or have been approved to be built but are not yet built) and activities that overlap with the effects of the Project.</p>

**Table 53: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
(Cont'd.)	(Cont'd.) The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines (also known as the provincial Application Information Requirements, or federal Tailored Impact Statement Guidelines) for the Project. The IAAC and BCEAO will consult with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuance of the final Joint Guidelines. GCT will continue to engage with Musqueam Indian Band on this issue during the Project planning and assessment phase.
To adequately understand the impacts of the proposed Project on Musqueam Indian Band's Aboriginal interests it will be necessary to conduct Musqueam-specific studies, including on potential impacts on Musqueam Indian Band's Aboriginal rights, cultural continuity and socio-economic wellbeing.	The Impact Assessment is required to assess the potential Project effects on Indigenous Interests. GCT will continue to engage with Musqueam Indian Band on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Musqueam Indian Band's Indigenous Interests identified in the draft Joint Guidelines.
Concerned about potential impacts on migratory birds. Impacts on waterfowl flight paths in the area may impact Musqueam Indian Band's ability to harvest waterfowl. Waterfowl are essential to Musqueam for cultural purposes, and locations where they can be harvested have been dramatically limited in Musqueam territory.	The Impact Assessment is required to assess potential Project impacts on marine resources, wildlife and Indigenous Interests. Section 7.8 of the DPD identifies the preliminary potential Project effects on Indigenous Interests, such as harvesting and subsistence activities, which includes the right to harvest for Food, Social, and Ceremonial purposes, effects on historical and contemporary harvesting sites and accessibility of culturally important harvesting sites, change in abundance, distribution or quality of resources, and current and future availability, quality and quantity of foods. GCT will continue to engage with Musqueam Indian Band on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Musqueam Indian Bands' Indigenous Interests identified in the draft Joint Guidelines.
Concerned about the distinct impacts on Musqueam Indian Band that could result from accidents and malfunction. Appropriate data collection and analysis are necessary for understanding, avoiding, and mitigating potential impacts.	GCT is planning a risk-based approach for the assessment of malfunctions and accidents that could impact VCs and Indigenous Interests and looks forward to further engagement with Musqueam Indian Band on the scope of this important component of the Impact Assessment. GCT also appreciates and acknowledges the need for appropriate data collection. Based on regulatory requirements and engagement with First Nations, GCT is drafting Joint Guidelines to define the Project assessment scope. After we provide the draft Joint Guidelines to BC EAO and IAAC, they will consult Musqueam Indian Band and determine the final scope.

**Table 53: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>Since the Project is anticipated to operate in perpetuity, the impacts of the Project will also need to be permanent and irreversible. To effectively assess the impacts of the Project it is necessary to have information on how DP4 would be decommissioned and any permanent impacts that would remain, in case DP4 is ultimately decommissioned.</p>	<p>The impact of the construction of DP4 is assessed as permanent. There is no consideration for future decommissioning or restoration of the site. Operational impacts are assessed on an ongoing basis.</p> <p>As stated in the DPD, GCT has no intention to decommission DP4. However, GCT does not expect additional permanent impacts as a result of decommissioning and therefore the Impact Assessment will be comprehensive.</p>
<p>To understand the impact of DP4 on Musqueam Indian Band, it is necessary to assess the impacts of activities that are "incidental to the Project", even if aspects of these activities fall outside of GCT's care and control, including marine shipping.</p>	<p>GCT acknowledges Musqueam Indian Band's concerns related to potential effects associated with activities that are "incidental to the project" and is evaluating options to assess these activities, given that they are outside of GCT's care and control, as highlighted. The determination of the scope of the Impact Assessment will be determined throughout the development of the Joint Guidelines. GCT will continue to engage with Indigenous nations on the scope of the Impact Assessment. The Joint Guidelines and therefore scope is ultimately determined by the IAAC and the BCEAO.</p>

#### 8.4.15 Pacheedaht First Nation

This section describes GCT’s engagement with Pacheedaht First Nation during the Early Engagement Phase and includes information regarding their notice to engage as a PIN. Detailed records of engagement activities, key interests and issues raised by Pacheedaht First Nation are provided in Table 54 and Table 55.

GCT has engaged with Pacheedaht First Nation by email, letter, phone call, and virtual meeting. GCT has asked Pacheedaht First Nation to specify their preferred methods of engagement. Pacheedaht First Nation specified its designated representatives. GCT will continue to engage Pacheedaht First Nation and its designated representatives through various methods.

GCT initiated engagement with Pacheedaht First Nation via an introductory letter on February 25, 2020. GCT held a virtual meeting with Pacheedaht First Nation on November 16, 2020. GCT followed up with Pacheedaht First Nation on November 24, 2020, to offer another meeting and to initiate a discussion of an Initial Funding Agreement. From December to January 2021, GCT and Pacheedaht First Nation discussed the terms for the Initial Funding Agreement. GCT provided Pacheedaht First Nation with the signed Initial Funding Agreement on February 17, 2021. Pacheedaht First Nation provided their draft DPD comments to GCT in May 2021.

Pacheedaht First Nation submitted their notice to engage as a PIN to the BCEAO on November 26, 2020. In their notice, Pacheedaht First Nation stated that they have title, governance and harvesting rights within the Project area. Pacheedaht First Nation stated that they are concerned about the Project’s effects on their rights and interests related to Aboriginal title and governance, the safety of their members travelling in the area, intergenerational IK transmission, and the Project’s effect on fisheries and resources.

**Table 54: Summary of Key Engagement with Pacheedaht First Nation.**

Dates	Subject	Interaction Type	Summary of Engagement
February 25, 2020	Introduction	Letter	<ul style="list-style-type: none"> <li>GCT informed Pacheedaht First Nation about the Project and requested input on the IPD and Pacheedaht First Nation’s engagement and participation preferences.</li> </ul>
March 19, 2020	Introduction	Email	<ul style="list-style-type: none"> <li>GCT emailed Pacheedaht First Nation a presentation on the Project.</li> </ul>
September 29, 2020	IPD Update	Email	<ul style="list-style-type: none"> <li>GCT informed Pacheedaht First Nation that IAAC and the BCEAO approved the IPD and the Project was entering the Early Planning Phase.</li> </ul>
October 15, 2020	Comment Period	Email	<ul style="list-style-type: none"> <li>GCT emailed Pacheedaht First Nation regarding the initial comment period.</li> </ul>
October 26, 2020	New contact, Information Update	Email	<ul style="list-style-type: none"> <li>GCT emailed information on the initial comment period, IAAC capacity funding, and an updated presentation to the new contact.</li> </ul>
November 2, 2020	Virtual Open House	Email	<ul style="list-style-type: none"> <li>GCT informed Pacheedaht First Nation of upcoming Virtual Open Houses.</li> </ul>
November 16, 2020	Meeting	Virtual Meeting	<ul style="list-style-type: none"> <li>GCT met with Pacheedaht First Nation to discuss the Project.</li> </ul>
November 24, 2020	Meeting	Email	<ul style="list-style-type: none"> <li>GCT emailed Pacheedaht First Nation to schedule another meeting.</li> </ul>
December 1, 2020	Initial Funding Agreement	Email	<ul style="list-style-type: none"> <li>GCT sent Pacheedaht First Nation an updated Initial Funding Agreement.</li> </ul>
December 17, 2021	Initial Funding Agreement	Phone Call	<ul style="list-style-type: none"> <li>Call between GCT and Pacheedaht First Nation legal counsel to discuss Initial Funding Agreement</li> </ul>
January 18, 2021	Initial Funding Agreement	Email	<ul style="list-style-type: none"> <li>GCT emailed Pacheedaht First Nation legal counsel with an updated Initial Funding Agreement and responses to questions about the framework agreement content</li> </ul>
February 1, 2021	Initial Funding Agreement	Email	<ul style="list-style-type: none"> <li>GCT sent the final Initial Funding Agreement to Pacheedaht First Nation for signature</li> </ul>
February 9, 2020	Issues Raised, Meeting Request	Email	<ul style="list-style-type: none"> <li>GCT emailed Pacheedaht First Nation to set up a meeting to discuss issues and concerns raised in Pacheedaht First Nation’s comments on the IPD.</li> </ul>

**Table 54: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
February 10, 2021	Project Schedule	Email	<ul style="list-style-type: none"> <li>GCT provided a detailed Project schedule for Pacheedaht First Nation’s review of the DPD and Joint Guidelines.</li> </ul>
February 17, 2021	Initial Funding Agreement	Email	<ul style="list-style-type: none"> <li>GCT provided Pacheedaht First Nation with the signed Initial Funding Agreement.</li> </ul>
February 24, 2021	DPD Updates, Scheduling	Email	<ul style="list-style-type: none"> <li>GCT emailed Pacheedaht First Nation to inform them about DPD updates and schedule a meeting.</li> </ul>
April 7, 2021	Draft DPD Feedback Request	Email	<ul style="list-style-type: none"> <li>GCT sent Pacheedaht First Nation a copy of the draft DPD and requested feedback by May 7, 2021.</li> <li>GCT asked for a meeting to discuss the DPD, studies that Pacheedaht First Nation considers necessary in the review of the Project, and VCs.</li> </ul>
April 13, 2021	Draft DPD Follow up	Email	<ul style="list-style-type: none"> <li>GCT emailed Pacheedaht First Nation confirming receipt of the DPD and requesting that they provide feedback on the draft DPD by May 7, 2021, and to schedule a meeting.</li> </ul>
April 13, 2021	Draft DPD Feedback Request	Email	<ul style="list-style-type: none"> <li>GCT requested feedback on the draft DPD linked in the email by May 7, 2021.</li> </ul>
May 7, 2021	Draft DPD Comments	Email	<ul style="list-style-type: none"> <li>Pacheedaht First Nation provided comments on the draft DPD for GCT in an attachment.</li> </ul>
May 10, 2021	Contact Information and Meeting Materials	Email	<ul style="list-style-type: none"> <li>Pacheedaht First Nation requested all correspondence be sent to a Pacheedaht referrals email, and also requested the following draft materials before meeting:               <ul style="list-style-type: none"> <li>VC selection</li> <li>Indigenous Interests</li> <li>Joint Guidelines.</li> </ul> </li> </ul>

Pacheedaht First Nation raised the following issues relating to the Project during early engagement. These issues, along with GCT responses, are summarized in Table 55.

**Table 55: Summary of Indigenous Interests and Issues Raised by Pacheedaht First Nation.**

Indigenous Interests and Issues Raised	GCT Response
<p>Interference with Pacheedaht Aboriginal title and governance rights should the Project proceed without Pacheedaht’s consent</p>	<p>The Impact Assessment is required to assess the potential effects of the Project on Indigenous interests and rights. GCT will continue to engage with Pacheedaht First Nation on this issue during the Project planning and Impact Assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in Section 7.8 of the DPD.</p>
<p>Safety concerns for Pacheedaht members when they are travelling by boat to reach fishing and harvesting areas and when they are fishing and harvesting in areas of open water and along shorelines. Concern specifically about the safety of Pacheedaht First Nation fishers at Swiftsure Bank and the entrance of Juan de Fuca Strait with increased boat traffic. Concern regarding the requirement to provide a Notice to Mariners not addressing the increased safety risks because Pacheedaht fishers may not have radios on their boats.</p>	<p>The Impact Assessment is required to assess potential effects on marine navigation from the Project. GCT is working with the BC Chamber of Shipping on this issue. GCT will continue to engage with Pacheedaht First Nation on this issue during the Project planning and assessment phase.</p>
<p>Request that GCT commits to updating its existing Emergency Response Plan based on the outcome of the review process for the Project. The existing plan may not sufficiently address the risk created by the increased number of container ships associated with the Project, including that these vessels could become disabled in the Juan de Fuca Strait and risk running aground or colliding with Pacheedaht First Nation’s fishing vessels or other marine traffic. Request that the Impact Assessment fully assess how Pacheedaht First Nation would be impacted by an accident or malfunction associated with the Project, including an assessment of Pacheedaht First Nation’s ability to respond to an emergency in its marine territory. These impacts may require an updated Emergency Response Plan.</p>	<p>The Impact Assessment is required to assess the potential for malfunctions and accidents, the potential Project environmental effects including effects to marine use, and in developing emergency preparedness and response plans. GCT is planning a risk-based approach for the assessment of malfunctions and accidents that may affect VCs and Indigenous Interests identified for the Project. This may include assessment of the consequence of incidents and consider potential environmental, economic, social, cultural and health effects and effects to Indigenous Interests. GCT will continue to engage with Pacheedaht First Nation on these issues during the Project planning and assessment phase.</p>
<p>Destruction of fishing gear, such as the nets and lines that Pacheedaht members set, through being run over by vessels or being cut by Pacheedaht members needing to move away quickly from large vessels</p>	<p>The Impact Assessment is required to assess potential effects on marine use from the Project. GCT will continue to engage with Pacheedaht First Nation on this issue during the Project planning and assessment phase.</p>



**Table 55: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>Request that the addition of container traffic related to the RBT2 Project be included in the cumulative effects assessment.</p>	<p>The Impact Assessment will require the assessment of cumulative effects from past, present, and reasonably foreseeable projects, in combination with potential residual effects resulting from DP4. Based on the demand forecast, both projects will not be required at the same time, and therefore, the RBT2 project would not be considered as part of the cumulative effects assessment for DP4. GCT is advancing the DP4 project pursuant to assessments that it can be the first to address market demands through a more sustainable and financially viable project. GCT will continue to engage with Pacheedaht First Nation through process planning when determining the methodology for the cumulative effects assessment. While not related to the Project specifically, GCT also informed Pacheedaht First Nation about the support toward Indigenous-led initiatives assessing cumulative effects in South Salish Sea and provided contact information if they have any interest in exploring collaboration potential.</p> <p><a href="https://globalterminals.com/gct-puts-forward-200000-to-support-indigenous-led-initiatives-assessing-cumulative-effects-in-south-salish-sea/">https://globalterminals.com/gct-puts-forward-200000-to-support-indigenous-led-initiatives-assessing-cumulative-effects-in-south-salish-sea/</a></p>
<p>Concern over Swiftsure Bank, a hereditary fishing ground, which was historically, and is currently utilized by Pacheedaht First Nation, and is managed by the Pacheedaht fisheries department. It is heavily relied upon by Pacheedaht First Nation for cultural and economic fisheries, as well as the support of other cultural activities.</p>	<p>The Impact Assessment is required to assess potential Project effects on marine resources, fish, wildlife and Indigenous Interests, including traditional use activities. Effects on fish, fishing, and traditional foods are also likely topics for inclusion in the Project’s assessment of potential effects to VCs. The Impact Assessment will adhere to federal and provincial commitments related to fish and fish habitat. GCT will continue to engage with Pacheedaht First Nation on this issue during the project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Pacheedaht First Nations’ Indigenous Interests identified in the draft Joint Guidelines.</p>
<p>Concerns that unless Project-specific information is provided through a Traditional Use Study (TUS), the assessment will be inadequate. Request that GCT use TUS information provided by Pacheedaht First Nation, specific to the Project. Concern that previous studies prepared for a similar geographical area may not sufficiently capture Project-specific concerns, and may be outdated.</p>	<p>GCT understands that IK is holistic and provides valuable insights to the assessment, including the environmental, social, cultural, economic, health, resource use, and governance components of the assessment. Within the assessment, Pacheedaht First Nation IK will help inform the Project design, baseline data collection, and identification of:</p> <ul style="list-style-type: none"> <li>• Valued Components (VCs)</li> <li>• Indicators and measures</li> <li>• Spatial and temporal boundaries</li> <li>• Potential mitigation measures</li> <li>• Follow-up and monitoring procedure</li> </ul>

**Table 55: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
(Cont'd.)	(Cont'd.) GCT will continue to engage with Pacheedaht First Nation on the inclusion of their IK in the Impact Assessment. The Impact Assessment is required to assess the potential effects of the Project on Indigenous Interests. GCT will continue to engage with Pacheedaht First Nation on this issue during Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD Section 7.8, and list of potential effects on Pacheedaht First Nations' Indigenous Interests identified in the draft Joint Guidelines.
Request for clarity regarding definitions of risk as included in the Accidents and Malfunctions assessment. Request for clarity regarding approaches to assessing and managing low likelihood, high-consequence events such as marine spills, given the importance to Pacheedaht First Nation.	The Impact Assessment is required to assess the potential for malfunctions and accidents, the potential Project environmental effects including effects to marine use. GCT is planning a risk-based approach for the assessment of malfunctions and accidents that could affect VCs and Indigenous Interests identified for the Project. This could include assessment of the consequence of incidents and consider potential environmental, economic, social, cultural and health effects and effects to Indigenous Interests. The assessment will also describe risk management approaches, including existing regulations and programs and the entities responsible. GCT has contracts with Quantum Murray Environmental (Emergency Response) and WCMRC for 24- hour response, mitigation and clean-up. GCT will continue to engage with Pacheedaht First Nation on these issues during the Project planning and assessment phase.
Request that the Human Health, Heritage, and effects to Indigenous Peoples assessment all consider the effects of marine shipping.	GCT acknowledges the potential effects of increased marine shipping and issues associated with access, marine use, marine mammals and cultural health. The Impact Assessment is required to assess potential Project effects on human health, Indigenous Interests, and physical and cultural heritage. The determination of the scope of the Impact Assessment will be part of the preparation of the Joint Guidelines. GCT will continue to engage with Pacheedaht First Nation on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Pacheedaht First Nations' Indigenous Interests identified in the draft Joint Guidelines. The BCEAO and IAAC will ultimately be responsible for confirming the scope of the Impact Assessment and the factors to be considered through additional engagement on their Joint Guidelines.

**Table 55: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>Concerns that effects of the Oceans Protection Plan (OPP) on Pacheedaht First Nation’s marine territory are unclear, and as such the OPP does not address Pacheedaht First Nation’s concerns regarding cumulative effects.</p>	<p>The Impact Assessment is required to assess potential Project effects on marine use, marine navigation, fish, wildlife and Indigenous Interests and rights. The factors to be considered, and the scope of those factors, will be described in the Project Joint Guidelines and will be confirmed through additional engagement with Indigenous nations, stakeholders, the public, federal and provincial regulators. GCT will continue to engage with Pacheedaht First Nation on this issue during the Project planning and assessment phase.</p>
<p>Impacts to orcas and other marine mammals caused by interference with foraging behaviour and the risk of vessel strikes</p>	<p>The Impact Assessment is required to assess potential Project wildlife effects. GCT will continue to engage with Pacheedaht First Nation on these issues during the Project planning and assessment phase.</p>
<p>Damage to intertidal and shoreline habitat caused by vessel wake</p>	<p>Alterations to coastal geomorphology will be considered in the assessment. This may include vessel wake. Alterations in coastal geomorphology may inform the effect pathway for the assessment of effects on VCs, such as, but not limited to, Fish and Fish Habitat and Archaeology. GCT will continue to engage with Pacheedaht First Nation on this issue during the Project planning and assessment phase.</p>
<p>Disruption of the transmission of intergenerational knowledge and language by interfering with Pacheedaht First Nation’s ability to be safe on the water with elders and children, including the transmission of management, fishing and harvesting knowledge for all aquatic species from the Marine Territory.</p>	<p>The Impact Assessment is required to assess potential Project effects on marine use, marine navigation and Indigenous Interests, including traditional use activities and cultural continuation. GCT will continue to engage with Pacheedaht First Nation on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Pacheedaht First Nations’ Indigenous Interests identified in the draft Joint Guidelines.</p>
<p>Damage and contamination to the resources and habitat that support Pacheedaht First Nation’s Aboriginal rights through discharges, leaks, and spills.</p>	<p>The Impact Assessment is required to assess the potential Project effects on the marine resources, wildlife and Indigenous Interests and rights. GCT is planning a risk-based approach for the assessment of malfunctions and accidents that may affect VCs and Indigenous Interests identified for the Project. This may include assessment of the consequence of incidents and consider potential environmental, economic, social, cultural and health effects and effects to Indigenous Interests. GCT will continue to engage with Pacheedaht First Nation on this issue during the Project planning and assessment phase.</p>

**Table 55: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>Disruption to the sense of quiet that is required for harvesting and that supports Pacheedaht First Nation’s spiritual connection to the Marine Territory</p>	<p>The Impact Assessment is required to assess potential Project effects on marine use and Indigenous Interests including Indigenous health, wellbeing, and culture linked to spiritual connection to the marine territory. The Impact Assessment will characterize sensory disturbances during construction and operation in the Noise and Vibration and the Light assessment sections. Potential effects of sensory disturbance to wildlife will be considered in the Wildlife Resources assessment. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines for the Project, and will be confirmed through additional engagement with Indigenous nations, stakeholders, the public, federal and provincial regulators. GCT will continue to engage with Pacheedaht First Nation on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Pacheedaht First Nations’ Indigenous Interests identified in the draft Joint Guidelines.</p>
<p>Concerns about avoidance of the Marine Territory by Pacheedaht First Nation members due to concerns about collisions, habitat contamination, and discharges and spills</p>	<p>The Impact Assessment is required to assess potential effects to marine navigation and marine use. GCT is planning a risk-based approach for the assessment of malfunctions and accidents that may impact VCs and Indigenous Interests identified for the project. This could include assessment of the consequence of incidents and consider potential environmental, economic, social, cultural and health effects and effects to Indigenous Interests. GCT will continue to engage with Pacheedaht First Nation on this issue during the project planning and assessment phase.</p>
<p>Concern about the safety of Pacheedaht First Nation fishers at Swiftsure Bank and the entrance of Juan de Fuca Strait with increased boat traffic.</p>	<p>The Impact Assessment is required to assess potential Project effects on marine use and marine navigation. GCT will continue to engage with Pacheedaht First Nation on this issue during the Project planning and assessment phase.</p>
<p>Impacts to orca as a result of acoustic disturbance, vulnerable to vessel strikes, and there extremely close proximity between the proposed shipping routes and their critical habitat and migratory routes.</p>	<p>The Impact Assessment is required to assess potential Project effects on wildlife. The Impact Assessment will characterize sensory disturbances during construction and operation in the Noise and Vibration and the Light assessment sections. Potential effects of sensory disturbance to wildlife will be considered in the Wildlife Resources assessment. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines for the Project and will be confirmed through additional engagement with Indigenous nations, stakeholders, the public, federal and provincial regulators. GCT will continue to engage with Pacheedaht First Nation on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Pacheedaht First Nations’ Indigenous Interests identified in the draft Joint Guidelines.</p>

**Table 55: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>The statement that the Salish Sea Initiative (SSI) “responds to concerns about the cumulative effects on valued ecosystem components” could be read as suggesting that the SSI has addressed these concerns. Pacheedaht First Nation objects to GCT commenting on the extent to which the SSI has responded to cumulative effects concerns, which from Pacheedaht First Nation’s perspective remain unaddressed.</p>	<p>GCT’s reference to the Salish Sea Initiative was intended to provide additional context on cumulative effects management outside of an individual project. GCT acknowledges that from Pacheedaht First Nation’s perspective concerns regarding cumulative effect remain outstanding. GCT will continue to engage with Pacheedaht First Nation on the Project’s contributions to and management of cumulative effects going forward.</p> <p>The Impact Assessment is required to assess the potential cumulative effects of the Project. To assess the cumulative effects on a given VC, the residual effects of the Project will be assessed in combination with the potential effects of other past, present and reasonably foreseeable projects (projects that are either proposed (public disclosure) or have been approved to be built but are not yet built). The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines. The IAAC and BCEAO will engage with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuance of the final Joint Guidelines.</p>
<p>Impacts to marine birds inadvertently harmed or disturbed as a result of marine shipping-related activities, including collision with vessels, attraction to vessel lights, and disturbance to birds feeding, roosting, or nesting on the water or in the intertidal area.</p>	<p>The Impact Assessment is required to assess potential Project effects on marine resources, wildlife and Indigenous Interests. GCT will continue to engage with Pacheedaht First Nation on this issue during the project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Pacheedaht First Nations’ Indigenous Interests identified in the draft Joint Guidelines.</p>
<p>Include impacts to air quality as a result of emissions from large marine vessels, which are predicted to be greatest within the Juan de Fuca Strait due to the longer transit time and greater average speed of ships in that segment. Locations for monitoring activities should be determined in consultation with Pacheedaht First Nation.</p>	<p>The Impact Assessment is required to assess the potential effects of the Project on air quality and human health. GCT is committed to reducing and avoiding GHG emissions where possible throughout the advancement of the Project. The Impact Assessment will describe the Project’s contribution to the best achievable technologies to mitigate GHG emissions from the Project. The factors to be considered in the Impact Assessment, and the scope of those factors will be described in the Joint Guidelines. The IAAC and BCEAO will engage with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuance of the final Joint Guidelines. GCT will continue to engage with Pacheedaht First Nation on this issue during the Project planning and assessment phase.</p>

**Table 55: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>Potential for damage to shoreline archaeological sites as a result of changes in wave frequency, direction, and size. Request for wave modelling to be completed for Pacheedaht First Nation’s territory and incorporated into an assessment of potential impacts to shoreline archaeological sites.</p>	<p>The Impact Assessment is required to assess the potential effects of the project on physical and cultural heritage, including shoreline archaeological resources. GCT will continue to engage with Pacheedaht First Nation on this issue during Project planning and assessment phase, including on how the preliminary list of potential effects on Indigenous Interests identified in the Joint Guidelines can incorporate effects on areas of high archaeological potential and use of cultural places.</p>
<p>Cumulative effects to fishing grounds in shipping lanes as a result of large vessels. Pacheedaht First Nation members consider that the acceptable threshold for the amount of traffic in the shipping lanes has already been exceeded, such that any additional effects would further degrade already unacceptable conditions.</p>	<p>The Impact Assessment is required to assess the potential effects of the project on marine use and Indigenous Interests. The Impact Assessment will also require the assessment of cumulative effects from past, present, and reasonably foreseeable projects, in combination with potential residual effects resulting from DP4. GCT will continue to engage with Pacheedaht First Nation on this issue during the Project planning and assessment phase.</p>
<p>Impacts to the availability of marine resources in sufficient quality and quantity to support marine harvesting, fishing, and hunting. Concern that fish and mammals will avoid the area due to increased vessel noise and disturbance.</p>	<p>The Impact Assessment is required to assess the potential effects of the project on marine resources, fish, wildlife and Indigenous Interests, including traditional use activities. Effects on fish, fishing, and traditional foods are also likely topics for inclusion in the Impact Assessment of potential effects to VCs. GCT will continue to engage with Pacheedaht First Nation on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Pacheedaht First Nation’s Indigenous Interests identified in the draft Joint Guidelines.</p>

#### 8.4.16 Pauquachin First Nation

This section describes GCT’s engagement with Pauquachin First Nation during the Early Engagement Phase and includes information regarding their notice to engage as a PIN. Detailed records of engagement activities, key interests and issues raised by Pauquachin First Nation are provided in Table 56 and Table 57.

GCT has engaged with Pauquachin First Nation with letters, emails, a video call and an in-person visit. GCT asked Pauquachin First Nation to specify their preferred methods of engagement. As engagement progresses, GCT is prepared to modify the methods of engagement should that be requested by Pauquachin First Nation. In the meantime, GCT will continue to engage Pauquachin First Nation through various methods.

GCT initiated engagement with Pauquachin First Nation via an introductory letter on February 25, 2020. On January 5, 2021, GCT sent a draft Initial Funding Agreement to Pauquachin First Nation. On February 4, 2021, GCT received the signed Initial Funding Agreement from Pauquachin First Nation. On March 15, 2021, GCT met with Pauquachin First Nation to discuss the DPD, VCs and studies to be included in the Application. On May 7, 2021, GCT invited Pauquachin First Nation to attend a workshop to discuss the draft DPD feedback, VC selection, Indigenous Interests, and the draft Joint Guidelines.

Pauquachin First Nation submitted their notice to engage as a PIN to the BCEAO on December 14, 2020. In their notice, Pauquachin First Nation stated that they have “constitutionally protected aboriginal and Douglas Treaty rights, including governance rights, over lands and waters that may be affected by the Project” (Pauquachin First Nation 2020).

**Table 56: Summary of Key Engagement with Pauquachin First Nation.**

Dates	Subject	Interaction Type	Summary of Engagement
February 25, 2020	Introduction	Letter	<ul style="list-style-type: none"> <li>GCT informed the Pauquachin First Nation about the Project and requested input on the IPD and about the Pauquachin First Nation engagement and participation preferences.</li> </ul>
March 17, 2020	Introduction	In-person	<ul style="list-style-type: none"> <li>GCT visited the Pauquachin First Nation office and left a presentation about the Project with the Pauquachin First Nation staff.</li> </ul>
July 31, 2020	Presentation	Video call	<ul style="list-style-type: none"> <li>GCT gave a presentation on the Project and discussed the Project, concerns, and capacity funding.</li> </ul>
September 29, 2020	IPD	Email	<ul style="list-style-type: none"> <li>GCT provided an update on IAAC and BCEAO approval of IPD.</li> </ul>
October 15, 2020	Comment Period	Email	<ul style="list-style-type: none"> <li>GCT informed Pauquachin First Nation about the comment period for the IPD.</li> </ul>
November 2, 2020	Virtual Open House	Email	<ul style="list-style-type: none"> <li>GCT informed Pauquachin First Nation of upcoming Virtual Open Houses.</li> </ul>
January 5, 2021	Initial Funding Agreement	Email	<ul style="list-style-type: none"> <li>GCT provided Pauquachin First Nation with a draft Initial Funding Agreement.</li> </ul>
February 4, 2021	Initial Funding Agreement	Email	<ul style="list-style-type: none"> <li>Pauquachin First Nation provided GCT with a signed Initial Funding Agreement.</li> </ul>
February 9, 2021	Initial Funding Agreement	Email	<ul style="list-style-type: none"> <li>GCT provided Pauquachin First Nation with a copy of the signed and executed Initial Funding Agreement.</li> </ul>
February 10, 2021	Project Schedule	Email	<ul style="list-style-type: none"> <li>GCT provided a detailed Project schedule for Pauquachin First Nation’s review of the DPD and Joint Guidelines.</li> </ul>
February 24, 2021	DPD Update	Email	<ul style="list-style-type: none"> <li>GCT provided Pauquachin First Nation with an update on the DPD and anticipated schedule.</li> </ul>
March 15, 2021	DPD, Impact Assessment Studies, VC Selection	Meeting	<ul style="list-style-type: none"> <li>GCT met with Pauquachin First Nation to discuss DPD, VC selection and studies for EA.</li> </ul>

**Table 56: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
March 15, 2021	Reports	Email	<ul style="list-style-type: none"> <li>GCT sent the Pauquachin First Nation the following reports:               <ul style="list-style-type: none"> <li>Analysis of Capacity Options on the West Coast of Canada</li> <li>Preliminary Environmental Impact Comparison RBT2 &amp; DP4</li> <li>Vessel Traffic in Canada’s Pacific Region.</li> </ul> </li> </ul>
April 7, 2021	Draft DPD Feedback Request	Email	<ul style="list-style-type: none"> <li>GCT sent Pauquachin First Nation a copy of the draft DPD and requested feedback by May 7, 2021.</li> <li>GCT asked for a meeting to discuss the DPD, studies that Pauquachin First Nation considers necessary in the review of the Project, and VCs.</li> </ul>
April 15, 2021	Draft DPD Follow up	Email	<ul style="list-style-type: none"> <li>GCT emailed Pauquachin First Nation confirming receipt of the DPD and requesting that they provide feedback on the draft DPD by May 7, 2021, and to schedule a meeting.</li> </ul>
May 7, 2021	Draft DPD Workshop	Email	<ul style="list-style-type: none"> <li>GCT invited Pauquachin First Nation to attend a workshop to discuss the following:               <ul style="list-style-type: none"> <li>Draft DPD feedback</li> <li>VC Selection</li> <li>Indigenous Interests</li> <li>Joint Guidelines.</li> </ul> </li> </ul>
May 14, 2021	Workshop Request	Email	<ul style="list-style-type: none"> <li>Pauquachin First Nation informed GCT they may not participate in the proposed workshop due to other pressing matters.</li> </ul>

During early engagement, Pauquachin First Nation raised various issues related to the Project. These issues, along with Indigenous Interests raised by Pauquachin First Nation members and the corresponding responses from GCT are summarized in Table 57.



**Table 57: Summary of Indigenous Interests and Issues Raised by Pauquachin First Nation.**

Indigenous Interests and Issues Raised	GCT Response
<p>Concerns about the cumulative effects of both DP4 and RBT2 projects proceeding, and Pauquachin First Nation’s ability to participate meaningfully in the management of those effects.</p>	<p>The Impact Assessment will require the assessment of cumulative effects from past, present, and reasonably foreseeable projects, in combination with potential residual effects resulting from DP4. Based on the demand forecast, both the RBT2 and DP4 projects would not be required at the same time, and therefore, the RBT2 project would not be considered as part of the cumulative effects assessment for DP4. GCT is advancing the DP4 project pursuant to assessments that it can be the first to address market demands through a more sustainable and financially viable project. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines (also known as the provincial Application Information Requirements, or federal Tailored Impact Statement Guidelines) for the Project. The IAAC and BCEAO will consult with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuance of the final Joint Guidelines.</p>
<p>Baseline data must be gathered to assess the impacts of the Project and for effective monitoring throughout the life of the Project.</p>	<p>GCT will continue to engage with Pauquachin First Nation during the Project planning and assessment phase about IK, traditional use, baseline data held by Pauquachin First Nation, and monitoring plans. GCT will discuss post-construction and operations monitoring with Pauquachin First Nation as the project proceeds.</p>
<p>Avoidance and mitigation of negative impacts to the greatest extent possible with rehabilitation in areas where harm is caused.</p>	<p>The Impact Assessment is required to assess potential effects on the environment from the project. GCT will continue to engage with Pauquachin First Nation in an effort to avoid and mitigate adverse effects on the environment.</p>
<p>Interest in compensation for any cultural interference or loss caused as a result of the Project</p>	<p>The Impact Assessment is required to assess potential Project effects on physical and cultural heritage. GCT will continue to engage with Pauquachin First Nation on this issue during project planning and assessment phase, including on how the preliminary list of potential effects on Indigenous Interests identified in the Joint Guidelines can incorporate effects on areas of high archaeological potential and use of cultural places.</p> <p>GCT will continue to engage with Pauquachin First Nation on this issue during the Project planning and Impact Assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Pauquachin First Nations’ Indigenous Interests identified in the draft Joint Guidelines.</p>
<p>Share of wealth generated as a result of the Project, with preferential access to jobs, training, and business opportunities</p>	<p>GCT will engage with Pauquachin First Nation about possible employment opportunities and other potential economic benefits during the Project planning and Impact Assessment phase. To facilitate that process GCT has entered into discussions with the Pauquachin First Nation on developing a related Framework Agreement to advance discussions related to economic opportunities.</p>

**Table 57: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>Assessment should be completed to ensure that the Project does not unjustifiably infringe on Aboriginal or Treaty Rights, including resource harvesting and other traditional practices</p>	<p>The Impact Assessment is required to assess the potential effects of the project on marine resources, fish, wildlife and Indigenous Interests, including traditional use activities. Effects on fish, fishing, and traditional foods are also likely topics for inclusion in the Project’s assessment of potential effects to VCs. GCT will continue to engage with Pauquachin First Nation on this issue during the project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Pauquachin First Nations’ Indigenous Interests identified in the draft Joint Guidelines.</p>
<p>Concerns about invasive species being brought into the area from travelling ships</p>	<p>GCT acknowledges Pauquachin First Nation’s concerns related to the introduction of invasive species from travelling ships. GCT abides by all regulatory requirements for ships that are berthed at Deltaport but has no ability to direct or influence vessels at sea. GCT encourages Pauquachin First Nation to communicate its concerns to Transport Canada who regulates activities such as ballast water exchange that could lead to the introduction of invasive species.</p>
<p>Overall impacts on ocean and marine resources.</p>	<p>The Impact Assessment is required to assess the potential effects of the Project on marine resources, wildlife, vegetation, and fish. GCT will continue to engage with Pauquachin First Nation on this issue during the Project planning and Impact Assessment phase.</p>
<p>Assessment should extend beyond 12 nautical mile limit to 200 nautical miles.</p>	<p>The spatial scope of the Impact Assessment will be determined by the IAAC and the BCEAO. Notwithstanding this determination, GCT will work with Indigenous nations to determine potential options to assess Project-related marine shipping effects in their traditional territory, which may extend beyond the spatial scope determined by the IAAC and the BCEAO. Such assessment will explore opportunities to partner with regulators and Indigenous nations on potential mitigation options and wider management initiatives.</p>
<p>Concerns about the impacts of increased marine traffic and Project construction on Pauquachin First Nation’s economic interests, water traveling safety, cultural and heritage sites and the ability to exercise treaty rights.</p>	<p>The Impact Assessment is required to assess the potential effects of the project on marine use, marine navigation and physical and cultural heritage. GCT will continue to engage with Pauquachin First Nation on this issue during project planning and assessment phase, including on how the preliminary list of potential effects on Indigenous Interests identified in the Joint Guidelines can incorporate effects on areas of high archaeological potential and access to cultural places.</p>
<p>Concerns about the impacts of increased marine traffic and Project construction on the ecosystem and resources within the Salish Sea.</p>	<p>The Impact Assessment is required to assess the potential Project effects of the project on marine resources, fish, wildlife and Indigenous Interests. GCT will continue to engage with Pauquachin First Nation in an effort to avoid and mitigate adverse effects on the environment.</p>

**Table 57: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>Concerns about the potential for accidents and malfunctions and its effects on Pauquachin First Nation’s economic interests, water traveling safety, cultural and heritage sites and the ability to exercise treaty rights.</p>	<p>Project assessment is required to assess the potential for malfunctions and accidents, the potential effects on the environment from the project, and effects on marine use. GCT is planning a risk-based approach for the assessment of malfunctions and accidents that may affect VCs and Indigenous Interests identified for the Project. This may include assessment of the consequence of incidents and consider potential environmental, economic, social, cultural and health effects and effects to Indigenous Interests. GCT will continue to engage with Pauquachin First Nation on this issue during the project planning and assessment phase.</p>
<p>Concerns about the potential for accidents and malfunctions and its effects on the ecosystem and resources within the Salish Sea.</p>	<p>Project assessment is required to assess the potential for malfunctions and accidents, the potential effects on the environment from the project, and effects on marine use. GCT is planning a risk-based approach for the assessment of malfunctions and accidents that could affect VCs and Indigenous interests identified for the project. This could include assessment of the consequence of incidents and consider potential environmental, economic, social, cultural and health effects and effects to Indigenous interests. GCT will continue to engage with Pauquachin First Nation on this issue during the project planning and assessment phase.</p>
<p>Concerns about how alternatives to the Project will be assessed.</p>	<p>The Impact Assessment is required to assess Project alternatives. GCT will continue to engage with Pauquachin First Nation on this issue during the Project planning and Impact Assessment phase.</p>
<p>Concerns about emergency preparedness and response and the need for sufficient government, organization, and volunteer capacity to respond to an accident or malfunction at the project site or with a container ship.</p>	<p>The Impact Assessment is required to assess the potential for malfunctions and accidents, the potential effects on the environment from the project, and effects on marine use. GCT is planning a risk-based approach for the assessment of malfunctions and accidents that may affect VCs and Indigenous Interests identified for the project. This may include assessment of the consequence of incidents and consider potential environmental, economic, social, cultural and health effects and effects to Indigenous Interests. GCT will continue to engage with Pauquachin First Nation on this issue during the project planning and assessment phase.</p>
<p>Concerns about the physical and mental health of people.</p>	<p>The Impact Assessment is required to assess the potential human health effects of the Project. GCT will continue to engage with Pauquachin First Nation on this issue during the Project planning and assessment</p>
<p>Concerns about the accuracy of market projections.</p>	<p>GCT will engage with Pauquachin First Nation about the shipping container market and the assessment of Project alternatives. GCT has provided Pauquachin First Nation with a copy of the study that examines container capacity and market projections (<a href="#">Analysis of Capacity Options on the West Coast Canada – BlackQuay</a>).</p>

### 8.4.17 Penelakut Tribe

This section describes GCT’s engagement with Penelakut Tribe during the Early Engagement Phase. Detailed records of engagement activities, interests and issues raised by the Penelakut Tribe are provided in Table 58 and Table 59.

GCT engaged with Penelakut Tribe by email, letter, and phone call directly. GCT asked Penelakut Tribe to specify their preferred methods of engagement. As engagement progresses, GCT is prepared to modify the methods of engagement should that be requested by Penelakut Tribe. In the meantime, GCT will continue to engage Penelakut Tribe through various methods.

GCT initiated engagement with Penelakut First Nation on February 25, 2020, via an introductory letter. GCT held a virtual meeting with the Cowichan Nation communities of Cowichan Tribes, Halalt First Nation, Lyackson First Nation, Penelakut Tribe, and Stz’uminus First Nation on July 30, 2020. GCT met again with the Cowichan Nation communities on January 28, 2021. GCT met with Cowichan Tribes, Halalt First Nation, and Lyackson First Nation between April and June, 2021, to discuss capacity funding, updates to the draft DPD, VCs, the Joint Guidelines and Cowichan Tribes’ Indigenous Interests.

Penelakut Tribe has not submitted a notice to engage as a PIN to the BCEAO.

**Table 58: Summary of Key Engagement with Penelakut Tribe.**

Dates	Subject	Interaction Type	Summary of Engagement
February 25, 2020	Introduction	Letter	<ul style="list-style-type: none"> <li>GCT informed Penelakut Tribe about the Project and requested input on the IPD and about Penelakut Tribe's engagement and participation preferences.</li> </ul>
May 22, 2020	Capacity Funding	Email	<ul style="list-style-type: none"> <li>GCT emailed Penelakut Tribe to inform them of the federal capacity funding program and offered to assist Penelakut Tribe with the application process.</li> </ul>
July 29, 2020	Presentation	Video Call	<ul style="list-style-type: none"> <li>GCT met with Cowichan Tribes, Halalt First Nation, Lyackson First Nation, Penelakut, Tribe and Stz’uminus First Nation.</li> <li>GCT gave a presentation on the Project and discussed questions and concerns about the Project.</li> </ul>
August 4, 2020	Near Term Workplan	Email	<ul style="list-style-type: none"> <li>GCT sent Penelakut Tribe an email outlining the categories of near-term activities.</li> </ul>
September 29, 2020	IPD	Email	<ul style="list-style-type: none"> <li>GCT provided an update on IAAC and BCEAO approval of IPD.</li> </ul>
September 29, 2020	Capacity Funding	Email	<ul style="list-style-type: none"> <li>GCT sent Penelakut Tribe follow-up information on federal funding, and Transport Canada’s Underwater Noise reduction initiative.</li> </ul>

**Table 58: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
October 15, 2020	Comment Period	Email	<ul style="list-style-type: none"> <li>GCT informed Penelakut Tribe about the comment period for IAAC.</li> </ul>
October 28, 2020	Capacity Funding and Comment Period	Email	<ul style="list-style-type: none"> <li>GCT followed up with Penelakut Tribe about, the capacity letter from IAAC and the initial comment period.</li> </ul>
November 2, 2020	Virtual Open Houses	Email	<ul style="list-style-type: none"> <li>GCT informed Penelakut Tribe of upcoming Virtual Open Houses</li> </ul>
November 19, 2020	Presentation	Email	<ul style="list-style-type: none"> <li>GCT sent Penelakut Tribe a copy of the presentation given at virtual open houses.</li> </ul>
December 1, 2020	Capacity Funding Agreement	Email	<ul style="list-style-type: none"> <li>GCT updated the Capacity Funding Agreement in response to Penelakut Tribe's questions and sent the updated agreement to Penelakut Tribe for signature.</li> </ul>
December 10, 2020	IPD Comments	Email	<ul style="list-style-type: none"> <li>Cowichan Tribes, Halalt First Nation, Lyackson First Nation, Penelakut First Nation, and Stz'uminus First Nation submitted their comments on the IPD to the BC EAO.</li> </ul>
January 29, 2021	IAAC Funding	Email	<ul style="list-style-type: none"> <li>GCT provided Penelakut Tribe with additional information on IAAC capacity funding.</li> </ul>
January 29, 2021	JSOIE	Email	<ul style="list-style-type: none"> <li>GCT sent Penelakut Tribe the final JSOIE.</li> </ul>
January 28, 2021	IPD Comments, MOU	Meeting	<ul style="list-style-type: none"> <li>GCT met with Cowichan Tribes, Halalt First Nation, Lyackson First Nation and Penelakut Tribe and Stz'uminus First Nation to discuss:               <ul style="list-style-type: none"> <li>○ Past studies</li> <li>○ Project timeline</li> <li>○ Addressing comments in the DPD</li> </ul> </li> </ul>
February 24, 2021	DPD Update	Email	<ul style="list-style-type: none"> <li>GCT provided Penelakut Tribe with an update on the DPD and schedule.</li> </ul>
April 7, 2021	Draft DPD Feedback Request	Email	<ul style="list-style-type: none"> <li>GCT sent Penelakut Tribe a copy of the draft DPD and requested feedback by May 7, 2021.</li> <li>GCT asked for a meeting to discuss the DPD, studies that Penelakut Tribe considers necessary in the review of the Project, and VCs.</li> </ul>

**Table 58: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
April 13, 2021	Draft DPD Feedback Request	Email	<ul style="list-style-type: none"> <li>GCT sent Penelakut Tribe a copy of the draft DPD and requested feedback by May 7, 2021, and a meeting to discuss the DPD, studies that Penelakut Tribe considers necessary in the review of the project and to go over VCs.</li> </ul>
April 15, 2021	Capacity Funding	Email	<ul style="list-style-type: none"> <li>GCT emailed Penelakut Tribe asking if they are interested in completing a Capacity Funding Agreement.</li> </ul>
May 7, 2021	Draft DPD Workshop	Email	<ul style="list-style-type: none"> <li>GCT invited Penelakut Tribe to attend a workshop to discuss the following:               <ul style="list-style-type: none"> <li>Draft DPD</li> <li>VC selection</li> <li>Indigenous Interests</li> <li>Joint Guidelines</li> </ul> </li> </ul>
May 11, 2021	DPD Chapter 8	Email	<ul style="list-style-type: none"> <li>GCT provided an updated draft DPD Chapter 8 which included content that Penelakut Tribe had requested to be included on April 29. GCT requested feedback on the updates.</li> </ul>
May 19, 2021	Indigenous Interests Workshop Agenda	Email	<ul style="list-style-type: none"> <li>GCT proposed an agenda for the Indigenous Interests workshop which included discussing Indigenous Interests and VCs.</li> </ul>
June 15, 2021	VCs and Indigenous Interests Workshop	Meeting	<ul style="list-style-type: none"> <li>GCT met with Cowichan Tribes, Halalt First Nation, Penelakut Tribe, and Lyackson First Nation to discuss:               <ul style="list-style-type: none"> <li>Project update</li> <li>Progress and refinement of VC selection</li> <li>Preliminary understanding of CNA's Indigenous Interests potential project effects</li> <li>CNA identified issues and concerns and GCT responses to CNA comments on the revised DPD</li> </ul> </li> </ul>
June 4, 2021	Draft DPD Comments	Email	<ul style="list-style-type: none"> <li>Penelakut Tribe sent GCT their draft DPD comments.</li> </ul>

During the early engagement, Penelakut Tribe raised several issues related to the Project. These issues, along with Indigenous Interests raised by Penelakut Tribe members and the corresponding responses from GCT are summarized in Table 59.

**Table 59: Summary of Indigenous Interests and Issues Raised by Penelakut Tribe.**

Indigenous Interests and Issues Raised	GCT Response
Use of area for FSC purposes and economic opportunities including Aboriginal Communal Fishing Licenses.	The Impact Assessment is required to assess the potential of the Project on Indigenous Interests. GCT will continue to engage with Penelakut Tribe on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Penelakut Tribes' Indigenous Interests identified in the draft Joint Guidelines.
Aboriginal title and fishing and harvesting rights to Tl'uqtinus village site.	The Impact Assessment is required to assess the potential Project effects on Indigenous Interests. GCT will continue to engage with Penelakut Tribe on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Penelakut Tribe's Indigenous Interests identified in the draft Joint Guidelines.
Recognition of other Indigenous nations' rights & title in the area.	The Impact Assessment is required to assess potential Project effects on Indigenous Interests and rights. GCT will continue to engage with Penelakut Tribe on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8, and list of potential effects on Penelakut Tribes' Indigenous Interests identified in the draft Joint Guidelines.
Principles of UNDRIP and of FPIC should be reflected in the document.	The Federal and Provincial governments have taken various steps to incorporate UNDRIP principles into the Impact Assessment. GCT will be following this process during the Project planning and Impact Assessment phase.
Questions about initial habitat inventory, cumulative impact assessment and past studies around sediment, coal dust, disposal at sea, eelgrass and intertidal marsh mapping, water quality, noise, and fish habitat offsetting.	GCT's technical personnel will engage with Penelakut Tribe to identify specific areas where gaps exist, and where further information and studies are required.
Concerns and questions about mitigation and offsetting measures for impacts to fish/fish habitat, WMA, migratory birds, shellfish, marine flora, water quality, and SRKW during all Project phases and spill response.	GCT is committed to meaningful engagement for proposed mitigation and offsetting measures as the Project progresses through the Environmental Impact Assessment process. GCT looks forward to engaging with Penelakut Tribe to address specific questions and concerns regarding mitigation and offsetting measures during construction and spill response.

**Table 59: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>Concerns about the efficacy and efficiency of the Oceans Protection Plan and Short Sea Shipping, including its impacts on fish and fish habitat in the Fraser River and its interference with the ability of Penelakut Tribes to exercise harvesting rights in the area.</p>	<p>The Impact Assessment is required to assess potential Project effects on marine use, marine navigation, fish, wildlife and Indigenous Interests and rights. GCT appreciates the importance of the Fraser River and supports the concept of re-establishing something similar to the FREMP by the relevant governments and agencies. The factors to be considered, and the scope of those factors, will be described in the Project Joint Guidelines and will be confirmed through additional engagement with Indigenous nations, stakeholders, the public, federal and provincial regulators. GCT will continue to engage with Penelakut Tribe on this issue during the Project planning and assessment phase.</p>
<p>Inclusion of communities in environmental and heritage monitoring.</p>	<p>GCT will continue to engage with Penelakut Tribe during the Project planning and Impact Assessment phase about opportunities for them to be included in future environmental and heritage monitoring plans.</p>
<p>Request for job opportunities and need for accommodations for workers from outside Metro Vancouver, and for GCT to provide information and assistance to Indigenous individuals who are interested in operational employment.</p>	<p>GCT is committed to providing information and assistance to Penelakut Tribe members who are interested in operational employment and facilitating engagement with the BC Maritime Employers Association. GCT will engage with Penelakut Tribe about possible job opportunities and accommodation options during the Project planning and assessment phase of the Project.</p>
<p>Concerns and questions about the adverse impacts of scour protection, dust, noise, and light pollution from the Project.</p>	<p>The Impact Assessment is required to assess the potential environmental effects. The Impact Assessment will characterize sensory disturbances such as lighting during construction and operation in the noise and vibration and the light assessment sections. Potential effects of sensory disturbance to wildlife will be considered in the wildlife resources assessment. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines for the Project and will be confirmed through additional engagement with Indigenous nations, stakeholders, the public, federal and provincial regulators. GCT will continue to engage with Penelakut Tribe on this issue during the Project planning and assessment phase.</p>
<p>Potential effects to safe and culturally appropriate access to resources including FSC fisheries.</p>	<p>The Impact Assessment is required to assess potential Project effects on Indigenous Interests and safety. GCT will continue to engage with Penelakut Tribe on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Penelakut Tribes' Indigenous Interests identified in the draft Joint Guidelines.</p>



**Table 59: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
Concerns about the impacts of rock fill, dredging material and road watering on water quality, water clarity, habitat, foraging, eelgrass beds and critical habitat processes including nutrient transfer.	The Impact Assessment is required to assess potential Project effects on Indigenous Interests and on the environment. GCT will continue to engage with Penelakut Tribe on these issues during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Penelakut Tribes' Indigenous Interests identified in the draft Joint Guidelines.
Old data from past projects should not be utilized as supplementary or supporting information to support this proposed project.	GCT will provide Penelakut Tribe with a list of secondary sources for validation purposes on topic areas relating to Indigenous Interests.
Important to effectively monitor water quality, water clarity, light, and noise and vibration levels during construction, throughout all phases of the Project, and beyond.	The Impact Assessment is required to assess potential Project effects on water quality and water clarity. The Impact Assessment will characterize sensory disturbances such as lighting during construction and operation in the noise and vibration and the light assessment sections. Potential effects of sensory disturbance to wildlife will be considered in the wildlife resources assessment. Monitoring is a key component of project assessments and will likely be required as a condition of regulatory approvals. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines for the Project, and will be confirmed through additional engagement with Indigenous nations, stakeholders, the public, and federal and provincial regulators. Monitoring plans to assess the effectiveness of mitigation measures will be developed as the impact assessment progresses.
Concerns and questions about effective collaboration, input during construction window, and time allotment for Penelakut Tribe review of developments and mitigation measures.	GCT will continue discussions with Penelakut Tribe on how to consult and collaborate in a respectful and meaningful way.
Concerns about using current accommodations and programs (i.e., TMX accommodations) to ensure a favourable Impact Assessment. Those programs are meant to be specific to the TMX pipeline and should not be relied on in other projects, only referenced as additional measures occurring in/adjacent to the Project area.	GCT will continue to engage with Penelakut Tribe on this issue during upcoming engagement activities.

Table 60 summarizes issues and concerns raised by Penelakut Tribe in relation DP4 project. At the request of the Penelakut Tribe, in order to support their review of the DPD, the table also includes issues raised in response to another proposed project in the Roberts Bank area, and which GCT understands may also be applicable to DP4.

**Table 60 Summary of Indigenous Interests and Issues Raised by Penelakut Tribe Which May Also Be Applicable to the Project.**

Indigenous Interests and Issues Raised	GCT Response
Concerns that the Project will displace Penelakut Tribe from an important crab fishing area, both during construction and operation	The Impact Assessment is required to assess potential effects on Indigenous Interests. GCT will continue to engage with Penelakut Tribe on this issue during Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Penelakut Tribes’ Indigenous Interests identified in the draft Joint Guidelines.
Concerns that the increased vessel traffic due to the Project will cause navigational conflicts for Penelakut Tribe members traveling to marine harvesting sites, as this requires crossing the Salish Sea and the shipping lanes.	The Impact Assessment is required to assess the potential effects of the project on marine use, marine navigation, and Indigenous Interests. GCT will continue to engage with Penelakut Tribe on these issues during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Penelakut Tribes’ Indigenous Interests identified in the draft Joint Guidelines.
Concerns that accidents or malfunctions at the terminal could result in additional impacts on substrates, marine vegetation, and marine invertebrates.	The Impact Assessment is required to assess the potential for malfunctions and accidents, the potential Project environmental effects including effects to the marine environment and species. GCT is planning a risk-based approach for the assessment of malfunctions and accidents that may impact VCs and Indigenous Interests identified for the Project. This may include assessment of the consequence of incidents and consider potential environmental, economic, social, cultural and health effects and effects to Indigenous Interests. GCT will continue to engage with Penelakut Tribe on these issues during the Project planning and assessment phase.
Concerns about Project impacts to crab populations and the effective and safe access to crab fishing locations	The Impact Assessment is required to assess potential Project effects on the environment, marine use and navigation. GCT will continue to engage with Penelakut Tribe on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8, and list of potential effects on Penelakut Tribes’ Indigenous Interests identified in the draft Joint Guidelines.
Concerns about the adverse Project impacts on commercial fisheries	The Impact Assessment is required to assess potential Project effects on marine use. GCT will continue to engage with Penelakut Tribe on this issue during the Project planning and assessment phase.
Concerns about the impairment of cultural experiences as a result of the Project impacts	The Impact Assessment is required to assess potential Project effects on Indigenous Interests. GCT will continue to engage with Penelakut Tribe on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Penelakut Tribes’ Indigenous Interests identified in the draft Joint Guidelines.

**Table 60: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
Concerns about the adverse impacts of increased vessel traffic due to the Project	The Impact Assessment is required to assess the potential Project effects on marine use and marine navigation. GCT will continue to engage with Penelakut Tribe on this issue during the Project planning and assessment phase.
Concerns about the adequacy of mitigation measures for protecting crabbing areas.	GCT is committed to meaningful engagement for proposed mitigation and offsetting measures as the Impact Assessment progresses. GCT looks forward to engaging with Penelakut Tribe to address specific questions and concerns regarding mitigation measures for crabbing areas.
Concerns about the impacts of the Project SRKW and the effects that a population-level extinction may have on the rest of the ecosystem and on local tourism.	SRKW are a critical species and their protection and conservation are important to GCT. Marine mammals including SRKW will be included in the Impact Assessment, and if the Project proceeds to permitting, the Project will also require a permit under the <i>Species at Risk Act</i> . GCT will engage with Indigenous nations including Penelakut Tribe to co-determine how IK and Indigenous views will inform the Impact Assessment of potential effects where we have permission from Penelakut Tribe to do so. The assessment of potential effects may include effects on tourism and the broader ecosystem. GCT looks forward to further engagement with Penelakut Tribe on this issue as the Impact Assessment process progresses and VCs are defined.
Concerns that the cumulative effects assessment does not consider the existing constraints that decrease Penelakut Tribe’s access to fishing, shellfish grounds and other high-value resource areas. These constraints include the shellfish closures, sponge reef closures, rockfish conservation area and competing uses including shipping lanes, log booms, local anchorages, recreational use and commercial fishing.	GCT understands the importance of acknowledging the current context in which Indigenous nations may be constrained in exercising their rights and accessing fishing and other high-value areas. This context will be incorporated into the Impact Assessment, including cumulative effects related to various environmental and socio-economic issues, such as those raised by Penelakut Tribe. GCT will continue to engage with Penelakut Tribe on these issues during Project planning and project Assessment phase.
Concerns about the uncertainty associated with the effectiveness of habitat offsetting. Penelakut Tribe argues that relying on this mitigation strategy as if successful underestimates the potential significance of effects.	The Project will require an Authorization under the <i>Fisheries Act</i> , which will require the development of a Habitat Offsetting Plan. DFO may account for the uncertainty associated with the effectiveness of the habitat offsetting by requiring a greater amount of offsetting. Monitoring will also be required to demonstrate that the habitat offsetting has been successful. Typically, this will occur in years 1, 3 and 5 post-construction but can be longer and more frequent depending on the specific characteristics of the offsetting. Success criteria are defined in the <i>Fisheries Act</i> authorization along with adaptive management measures to be implemented if these criteria are not met. A financial guarantee must also be provided to DFO with the authorization application to enable DFO to deliver the offsetting objective and achieve success criteria if the proponent does not. GCT will continue to engage with Penelakut Tribe on this issue during the project planning and assessment phase.

### 8.4.18 Popkum First Nation

This section describes GCT’s engagement with Popkum First Nation during the Early Engagement Phase. Detailed records of engagement activities with Popkum First Nation are provided in Table 61.

GCT has engaged with Popkum First Nation through a letter, phone call, emails, and a meeting. GCT asked Popkum First Nation to specify their preferred methods of engagement. As engagement progresses, GCT is prepared to modify the methods of engagement should that be requested by Popkum First Nation. In the meantime, GCT will continue to engage Popkum First Nation through various methods.

GCT initiated engagement with Popkum First Nation on June 10, 2020, via an introductory letter. On March 4, 2021, GCT met with Popkum First Nation to give a presentation on the Project and discuss future engagement activities. GCT met with Popkum First Nation on June 15, 2021, to discuss capacity funding, updates to the draft DPD, VCs, the Joint Guidelines and Popkum First Nation’s Indigenous Interests.

Popkum First Nation has not submitted a notice to engage as a PIN to the BCEAO.

**Table 61: Summary of Key Engagement with Popkum First Nation.**

Dates	Subject	Interaction Type	Summary of Engagement
June 10, 2020	Introduction	Letter	<ul style="list-style-type: none"> <li>GCT informed Popkum First Nation about the Project and requested input on the IPD and about Popkum First Nation engagement and participation preferences.</li> </ul>
September 11, 2020	Capacity Funding	Email	<ul style="list-style-type: none"> <li>GCT sent an email to Popkum First Nation about potential capacity funding opportunities.</li> </ul>
September 29, 2020	IPD	Email	<ul style="list-style-type: none"> <li>GCT provided an update on IAAC and BCEAO approval of IPD.</li> </ul>
October 15, 2020	Comment Period	Email	<ul style="list-style-type: none"> <li>GCT informed Popkum First Nation about the comment period for the IPD.</li> </ul>
October 26, 2020	Project Interest	Phone Call	<ul style="list-style-type: none"> <li>GCT left a message regarding Popkum First Nation’s interest in the Project.</li> </ul>
November 2, 2020	Virtual Open Houses	Email	<ul style="list-style-type: none"> <li>GCT informed Popkum First Nation regarding the Virtual Open Houses.</li> </ul>
February 10, 2021	Project Schedule	Email	<ul style="list-style-type: none"> <li>GCT provided a detailed Project schedule for Popkum First Nation’s review of the DPD and Joint Guidelines.</li> </ul>
February 18, 2021	DPD Update	Email	<ul style="list-style-type: none"> <li>GCT provided Popkum First Nation with an update on the DPD and the anticipated schedule.</li> </ul>
February 25, 2021	Meeting	Email	<ul style="list-style-type: none"> <li>GCT inquired if Popkum First Nation is interested in a meeting about the Project.</li> </ul>

**Table 61: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
March 4, 2021	Project Overview	Meeting	<ul style="list-style-type: none"> <li>GCT met with Popkum First Nation to provide an overview of the Project and discuss future engagement activities.</li> </ul>
March 4, 2021	Cumulative Effects	Email	<ul style="list-style-type: none"> <li>In response to a request from Popkum First Nation, GCT emailed contact information for Salish Sea Initiative.</li> </ul>
April 7, 2021	Draft DPD Feedback Request	Email	<ul style="list-style-type: none"> <li>GCT sent Popkum First Nation a copy of the draft DPD and requested feedback by May 7, 2021.</li> <li>GCT asked for a meeting to discuss the DPD, studies that Popkum First Nation considers necessary in the review of the Project, and VCs.</li> </ul>
April 15, 2021	Draft DPD	Email	<ul style="list-style-type: none"> <li>GCT requested feedback on the draft DPD and requested a meeting with Popkum First Nation to discuss the DPD and Popkum First Nation's VCs.</li> </ul>
May 7, 2021	Draft DPD	Email	<ul style="list-style-type: none"> <li>GCT invited Popkum First Nation to attend a workshop to discuss the following:               <ul style="list-style-type: none"> <li>Draft DPD</li> <li>VC selection</li> <li>Indigenous Interests</li> <li>Joint Guidelines</li> </ul> </li> </ul>
May 10, 2021	Draft DPD	Email	<ul style="list-style-type: none"> <li>Popkum First Nation stated they did not have comments on the draft DPD at that time, and requested more information about the Notice to Engage process.</li> </ul>
May 11, 2021	Information Request	Email	<ul style="list-style-type: none"> <li>GCT will follow up with Popkum First Nation on their information request regarding the Notice to Engage process.</li> </ul>
June 15, 2021	Vcs and Indigenous Interests Workshop	Meeting	<ul style="list-style-type: none"> <li>GCT met with Popkum First Nation to discuss:               <ul style="list-style-type: none"> <li>Project update</li> <li>Progress and refinement of VC selection</li> <li>Preliminary understanding of Popkum First Nation's Indigenous Interests potential project effects</li> </ul> </li> </ul>

During early engagement, Popkum First Nation raised various issues relating to the Project. These issues, along with Indigenous Interests raised by Popkum First Nation and the corresponding GCT responses, are summarized in Table 62.

**Table 62: Summary of Indigenous Interests and Issues Raised by Popkum First Nation.**

Indigenous Interests and Issues Raised	GCT Response
Popkum First Nation expressed concern about how eulachon populations had dropped significantly and, in some years, could not be found at all. Request that eulachon be considered in the Impact Assessment.	Eulachon will be included in Marine and Fish Habitat VCs. Past populations will be part of baseline assessments. Assessment of how the project would potentially affect eulachon will happen during the Impact Assessment. It would also be addressed in the Indigenous Interests portion of the Assessment for additional information from biophysical and Indigenous knowledge perspectives. GCT will continue to engage with Popkum First Nation on these issues during the Project planning and assessment phase.
Concerns about fish and fish habitat.	The Impact Assessment is required to review and evaluate potential Project effects on water quality, fish, vegetation, wildlife, marine resource, marine use and Indigenous Interests for inclusion in the Impact Assessment. GCT will continue to engage with Popkum First Nation on these issues during the Project planning and assessment phase.
Truck traffic	GCT acknowledges Popkum First Nation’s concerns related to potential effects associated with road-rail activities and is evaluating options to assess these activities as part of the Project assessment, since they are incidental activities and outside of GCT’s care and control.
Concerns about accidents and malfunctions.	The Impact Assessment is required to assess the potential for malfunctions and accidents, the potential environmental effects including effects to marine resources, fish, fish habitat, wildlife, aquatic wildlife, and Indigenous Interests.
Concerns about cumulative impacts.	The Impact Assessment is required to assess potential cumulative effects from past, present and reasonably foreseeable projects in combination with potential residual effects resulting from DP4.

#### 8.4.19 Sc’ianew First Nation

This section describes GCT’s engagement with Sc’ianew First Nation during the Early Engagement Phase. Detailed records of engagement activities, key interests and issues raised by Sc’ianew First Nation are provided in Table 63 and Table 64.

GCT has engaged with Sc’ianew First Nation by letters, emails, phone call, and conference call. GCT has asked Sc’ianew First Nation to specify their preferred methods of engagement. As engagement progresses, GCT is prepared to modify the methods of engagement should that be requested by Sc’ianew First Nation. In the meantime, GCT will continue to engage Sc’ianew First Nation through various methods.

GCT initiated engagement with Sc’ianew First Nation on February 25, 2020, via an introductory letter. On November 23, 2020, GCT and Sc’ianew First Nation started discussing the Initial Funding Agreement. The agreement was signed on January 5, 2021. GCT met with Sc’ianew First Nation on January 25, 2021, to discuss the development of the DPD and the draft Negotiation Framework Agreement. GCT met with Sc’ianew First Nation in May 2021 to discuss capacity funding, updates to the draft DPD, VCs, the Joint Guidelines and Sc’ianew First Nation’s Indigenous Interests.

Sc’ianew First Nation was identified as a PIN in the JSOI. Sc’ianew First Nation provided the BCEAO with comments on the IPD on November 27, 2020. In this letter, Sc’ianew First Nation identified environmental conditions, cultural conditions, economic conditions and treaty rights as key interests. This letter has been made available on BCEAO EPIC.

**Table 63: Summary of Key Engagement with Sc’ianew First Nation.**

Dates	Subject	Interaction Type	Summary of Engagement
February 25, 2020	Introduction	Letter	<ul style="list-style-type: none"> <li>GCT informed Sc’ianew First Nation about the Project and requested input on the IPD and about Sc’ianew First Nation’s engagement and participation preferences.</li> </ul>
March 2, 2020	Project Introduction	Phone Call	<ul style="list-style-type: none"> <li>Sc’ianew First Nation identified interest in learning about potential Project opportunities such as marine employment and training for their members.</li> </ul>
March 26, 2020	Opportunities	Letter	<ul style="list-style-type: none"> <li>GCT responded to Sc’ianew First Nation’s request for additional information regarding potential available opportunities and the process for addressing issues.</li> </ul>
September 10, 2020	Capacity Funding	Email	<ul style="list-style-type: none"> <li>GCT provided information about the following:               <ul style="list-style-type: none"> <li>IAAC capacity funding</li> <li>A news release from Transport Canada about addressing underwater vessel noise</li> </ul> </li> </ul>
September 29, 2020	IPD	Email	<ul style="list-style-type: none"> <li>GCT provided an update on IAAC and BCEAO approval of IPD.</li> </ul>
October 15, 2020	Comment Period	Email	<ul style="list-style-type: none"> <li>GCT informed Sc’ianew First Nation about the comment period for the IPD.</li> </ul>
October 20, 2020	Capacity Funding	Email	<ul style="list-style-type: none"> <li>Sc’ianew First Nation indicated that they had not received the letter and application from IAAC regarding Sc’ianew First Nation’s capacity funding.</li> </ul>
November 23, 2020	Initial Funding Agreement	Email	<ul style="list-style-type: none"> <li>GCT sent Sc’ianew First Nation the initial funding agreement.</li> </ul>
December 2, 2020	Project Footprint	Email	<ul style="list-style-type: none"> <li>GCT provided a report regarding project footprint comparison between RBT2 &amp; the Project.</li> </ul>
January 5, 2021	Initial Funding Agreement	Conference call	<ul style="list-style-type: none"> <li>GCT and Sc’ianew First Nation executed and signed the initial funding agreement.</li> </ul>

**Table 63: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
January 25, 2021	DPD	Meeting	<ul style="list-style-type: none"> <li>GCT met with Sc'ianew First Nation to discuss updates to the DPD and the draft negotiation framework agreement.</li> </ul>
January 25, 2021	IAAC Funding	Email	<ul style="list-style-type: none"> <li>GCT provided Sc'ianew First Nation with additional information on IAAC capacity funding.</li> </ul>
January 27, 2021	Cumulative Effects Initiative	Email	<ul style="list-style-type: none"> <li>GCT provided Sc'ianew First Nation information on Indigenous Led Cumulative Effects Initiative and Salish Sea Initiative.</li> </ul>
February 10, 2021	Project Schedule	Email	<ul style="list-style-type: none"> <li>GCT provided a detailed Project schedule for Sc'ianew First Nation's review of the DPD and Joint Guidelines.</li> </ul>
April 7, 2021	Draft DPD Feedback Request	Email	<ul style="list-style-type: none"> <li>GCT sent Sc'ianew First Nation a copy of the draft DPD and requested feedback by May 7, 2021.</li> <li>GCT asked for a meeting to discuss the DPD, studies that Sc'ianew First Nation considers necessary in the review of the Project, and VCs.</li> </ul>
May 10, 2021	Indigenous Interests	Meeting	<ul style="list-style-type: none"> <li>GCT met with Sci'ianew First Nation to provide a Project update, and discuss VCs and Indigenous Interests.</li> </ul>
June 22, 2021	DPD Comments	Email	<ul style="list-style-type: none"> <li>Sc'ianew First Nation provided DPD comments, noting they understand if GCT cannot consider the comments since it is past the June 18, 2021 deadline.</li> </ul>

During early engagement, Sc'ianew First Nation various issues relating to the Project. These issues, along with Indigenous Interests raised by Sc'ianew First Nation and the corresponding GCT responses, are summarized in Table 64.



**Table 64: Summary of Indigenous Interests and Issues Raised by Sc’ianew (Beecher Bay) First Nation.**

Indigenous Interests and Issues Raised	GCT Response
Interest about the potential project benefits to the community including marine employment and training for Sc’ianew First Nation members, particularly as Beecher Bay will be a location for oil spill response vessels.	GCT will engage with Sc’ianew First Nation about possible benefits to the community from the Project during the Project planning and Impact Assessment phase.
Concerns about the impacts of the Project on water quality, fish (including Sockeye, Chinook, and Coho salmon), birds, shellfish, marine mammals, wildlife, the propagation of invasive species, the overall health of the ocean and the subsequent impacts to Sc’ianew First Nation resources.	The Impact Assessment is required to assess potential Project effects on marine resources, fish and fish habitat including salmon, aquatic species, wildlife and Indigenous Interests. GCT will continue to engage with Sc’ianew First Nation on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Sc’ianew First Nations’ Indigenous Interests identified in the draft Joint Guidelines.
Concerns about the cumulative effects of this and other project using or seeking to use Sc’ianew First Nation’s Traditional Territories and Sc’ianew First Nation’s ability to participate meaningfully in the management of those effects. The cumulative effects associated with the project should be thoroughly assessed.	<p>The Impact Assessment is required to assess potential cumulative effects and effects to Indigenous Interests from the Project. To assess the cumulative effects on a given VC, the residual effects of the Project will be assessed in combination with the potential effects of other past, present and, reasonably foreseeable projects (projects that are either proposed (public disclosure) or have been approved to be built but are not yet built) and activities that overlap with the effects of the Project. The factors to be considered, and the scope of those factors, will be described in the Project Joint Guidelines. The IAAC and BCEAO will consult with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuance of the final Joint Guidelines.</p> <p>While not related to the Project specifically, GCT also informed the Sc’ianew First Nation about the SSIGA initiative related to cumulative effects, and provided contact information if they have any interest in collaborating.</p>
Effective monitoring throughout the life of the Project.	GCT will continue to engage with Sc’ianew First Nation during the Project planning and assessment phase about monitoring plans.
Avoidance and mitigation of negative impacts to the greatest extent possible with rehabilitation in areas where harm is caused.	The Impact Assessment is required to assess potential effects on the environment from the Project. GCT will continue to engage with Sc’ianew First Nation in an effort to avoid and mitigate negative impacts on the environment.
Concerns about Project impacts on cultural and heritage sites, member safety, and economic interests. Sc’ianew First Nation requests compensation for any cultural interference or loss caused as a result of the Project.	The Impact Assessment is required to assess the potential effects of the Project on Indigenous Interests. GCT will continue to engage with Sc’ianew First Nation on this issue during the project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8, and list of potential effects on Sc’ianew First Nations’ Indigenous Interests identified in the draft Joint Guidelines.

**Table 64: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
Share of wealth generated as a result of the Project, with preferential access to jobs, training and business opportunities.	GCT will engage with Sc'ianew First Nation about possible employment opportunities and other potential economic benefits during the Project planning and Impact Assessment phase. To facilitate that process GCT has entered into discussions with the Sc'ianew First Nation on developing a Framework Agreement to advance discussions related to economic opportunities.
Assessment should be completed to ensure that the Project does not unjustifiably infringe on Aboriginal or Treaty rights and title, including resource harvesting and other traditional practices.	The Impact Assessment is required to assess the potential Project effects on Indigenous Interests. GCT will continue to engage with Sc'ianew First Nation on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8, and list of potential effects on Sc'ianew First Nations' Indigenous Interests identified in the draft Joint Guidelines.
Concerns about invasive species being brought into the area from travelling ships	GCT acknowledges Sc'ianew First Nation's concerns related to the introduction of invasive species from travelling ships. GCT abides by all regulatory requirements for ships that are berthed at Deltaport but has no ability to direct or influence vessels at sea. GCT encourages Sc'ianew First Nation to communicate its concerns to Transport Canada who regulates activities such as ballast water exchange that could lead to the introduction of invasive species.
Concerns about the adverse environmental impacts.	The Impact Assessment is required to assess potential effects on the environment from the Project. GCT will continue to engage with Sc'ianew First Nation on this issue during the Project planning and Impact Assessment phase.
Concerns about how the Project alternatives are being assessed and the accuracy of market projections.	GCT will engage with Sc'ianew First Nation about the shipping container market and the assessment of Project alternatives. GCT has provided Sc'ianew First Nation with a copy of the study that examines container capacity and market projections ( <a href="#">Analysis of Capacity Options on the West Coast Canada – Black Quay</a> ).
Overall impact on the ocean and associated marine resources.	The Impact Assessment is required to assess potential Project effects of the project on marine resources, marine use, and Indigenous Interests. GCT will continue to engage with Sc'ianew First Nation on this issue during the Project planning and assessment phase.
Concerns about the impacts of accidents including concerns related to contamination from containers being lost at sea and washing up on the shore in Sc'ianew First Nation territory, and malfunctions on water quality, fish, birds, shellfish, marine mammals, wildlife, cultural and heritage sites, the health of the ocean and resources, the physical and mental health and safety of Sc'ianew First Nation people, the land, and economic interests.	The Impact Assessment is required to assess the potential for malfunctions and accidents, the potential environmental effects including effects to marine resources, fish, fish habitat, wildlife, aquatic wildlife, and Indigenous Interests. GCT is planning a risk-based approach for the assessment of malfunctions and accidents that may affect VCs and Indigenous Interests identified for the Project. This may include assessment of the consequence of incidents and consider potential environmental, economic, social, cultural and health effects and effects to Indigenous Interests. GCT will continue to engage with Sc'ianew First Nation on these issues during the Project planning and assessment phase.

**Table 64: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
Concern that the geographic scope of the assessment of 12 nautical miles does not include Sc'ianew interests.	The spatial scope of the Impact Assessment will be determined by the IAAC and the BCEAO. Notwithstanding this determination, GCT will work with Indigenous nations to determine potential options to assess Project-related marine shipping effects in their traditional territory, which may extend beyond the spatial scope determined by the IAAC and the BCEAO. Such assessment will explore opportunities to partner with regulators and Indigenous nations on potential mitigation options and wider management initiatives.
Concern with the age of vessels coming to Roberts Bank.	GCT will continue to engage with Sc'ianew First Nation on this issue during the Project planning and assessment phase.
Concerns about emergency preparedness and response and the need for sufficient government, organization and volunteer capacity to respond to an accident or malfunction at the project site or with a container ship.	The Impact Assessment is required to assess the potential for malfunctions and accidents, the potential Project environmental effects including emergency preparedness and response. GCT is planning a risk-based approach for the assessment of malfunctions and accidents that could impact VCs and Indigenous Interests identified for the project. This could include assessment of the consequence of incidents and consider potential environmental, economic, social, cultural and health effects and effects to Indigenous Interests. GCT will continue to engage with Sc'ianew First Nation on this issue during the Project planning and assessment phase.

#### 8.4.20 Seabird Island Band

This section describes GCT’s engagement with Seabird Island Band during the Early Engagement Phase. Detailed records of engagement activities, key interests and issues raised by Seabird Island Band are provided in Table 65 and Table 66.

GCT engaged with Seabird Island Band by meeting, phone calls, and emails. GCT asked Seabird Island Band to specify their preferred methods of engagement. As engagement progresses, GCT is prepared to modify the methods of engagement should that be requested by Seabird Island Band. In the meantime, GCT will continue to engage Seabird Island Band through various methods.

GCT initiated contact with Seabird Island Band via an introductory letter on February 25, 2020. GCT met with Seabird Island Band on December 21, 2020, to discuss the Project and assessment process. GCT met with Seabird Island Band on April 29, 2021, to discuss project updates, Seabird Island Band concerns, the draft DPD, the cooperative assessment process, VC selection and their Indigenous Interests. On December 17, 2020, GCT provided Seabird Island Band with the draft Capacity Funding Agreement. From March to May, 2021, GCT and Seabird Island Band revised the Capacity Funding Agreement. On May 13, 2021, GCT and Seabird Island Band met to discuss capacity funding, Seabird Island businesses, economic opportunities, the Dillon Traffic Impact report, and an RBT2 and DP4 comparison study. On June 14, 2021, GCT provided Seabird Island Band the finalized Capacity Funding Agreement.

Seabird Island Band has not submitted a notice to engage as a PIN to the BCEAO.

**Table 65: Summary of Key Engagement with Seabird Island Band.**

Dates	Subject	Interaction Type	Summary of Engagement
February 25, 2020	Introduction	Letter	<ul style="list-style-type: none"> <li>GCT informed the Seabird Island Band about the Project and requested input on the IPD and about the Seabird Island Band engagement and participation preferences.</li> </ul>
February 27, 2020	Follow up	Phone Call	<ul style="list-style-type: none"> <li>GCT followed up regarding engagement with Seabird Island Band and participation preferences.</li> </ul>
March 19, 2020	Introduction	Email	<ul style="list-style-type: none"> <li>GCT emailed a Project introduction presentation to Seabird Island Band.</li> </ul>
April 29, 2020	Meeting Request	Phone Call	<ul style="list-style-type: none"> <li>GCT contacted Seabird Island Band's Strategic Advisor and requested a meeting to discuss Seabird Island Band's preferred methods of engagement.</li> </ul>
May 11, 2020	Presentation	Meeting	<ul style="list-style-type: none"> <li>GCT gave a presentation on the Project.</li> </ul>
September 9, 2020	Capacity Funding	Phone Call	<ul style="list-style-type: none"> <li>GCT provided Seabird Island Band with information on capacity funding available.</li> </ul>
September 16, 2020	Information request	Letter	<ul style="list-style-type: none"> <li>Seabird Island Band wrote to GCT to request GCT provide: <ul style="list-style-type: none"> <li>Road and Traffic Studies</li> <li>Rail Traffic Studies</li> <li>Fishery Studies</li> <li>Environmental Studies</li> <li>Socio-Economic Studies</li> <li>Business Opportunity Studies</li> <li>Pollution Studies</li> </ul> </li> </ul>
September 18, 2020	Project Information	Email	<ul style="list-style-type: none"> <li>GCT responded to Seabird Island Band's email and sent them the requested information, as well as information about the IPD: <ul style="list-style-type: none"> <li>Global Container Terminals Conceptual DPX Fisheries Offset Plan by Amec Foster Wheeler</li> <li>GCT Deltaport Expansion: Offsetting Outline and Approach by Hemmera Envirochem</li> <li>Preliminary Environmental Impacts Comparison: RBT2 &amp; DP4 by PGL</li> <li>Assessment of Policy Options to Satisfy Canadian West Coast Container Port Capacity Needs by CPCS</li> <li><i>Analysis of Capacity Options on the West Coast of Canada</i> by Black Quay Consulting</li> </ul> </li> </ul>

**Table 65: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
September 23, 2020	Reports	Email	<ul style="list-style-type: none"> <li>GCT provided Seabird Island Band with a report titled:               <ul style="list-style-type: none"> <li><i>Economic Impact Study of the Proposed GCT Deltaport Expansion, Berth Four Project (DP4)</i> by MNP</li> </ul> </li> </ul>
September 29, 2020	IPD	Email	<ul style="list-style-type: none"> <li>GCT provided an update on IAAC and BCEAO approval of IPD.</li> </ul>
October 15, 2020	Comment Period	Email	<ul style="list-style-type: none"> <li>GCT informed Seabird Island Band about the comment period for the IPD.</li> </ul>
November 2, 2020	Virtual Open Houses	Email	<ul style="list-style-type: none"> <li>GCT informed Sc'ianew First Nation regarding the Virtual Open Houses</li> </ul>
December 17, 2020	Capacity Funding Agreement	Email	<ul style="list-style-type: none"> <li>GCT sent Seabird Island Band the Capacity Funding Agreement.</li> </ul>
December 21, 2020	Project Introduction	Meeting	<ul style="list-style-type: none"> <li>GCT met with Seabird Island Band to discuss the Project.</li> </ul>
February 10, 2021	Project Schedule	Email	<ul style="list-style-type: none"> <li>GCT provided a detailed Project schedule for Seabird Island Band's review of the DPD and Joint Guidelines.</li> </ul>
February 24, 2021	DPD Update	Email	<ul style="list-style-type: none"> <li>GCT informed Seabird Island Band of DPD updates and anticipated schedule.</li> </ul>
March 22, 2021	Capacity Funding Agreement	Email	<ul style="list-style-type: none"> <li>GCT followed up about the Capacity Funding Agreement sent in December.</li> </ul>
April 7, 2021	Draft DPD Feedback Request	Email	<ul style="list-style-type: none"> <li>GCT sent Seabird Island Band a copy of the draft DPD and requested feedback by May 7, 2021.</li> <li>GCT asked for a meeting to discuss the DPD, studies that Seabird Island Band considers necessary in the review of the Project, and VCs.</li> </ul>
April 29, 2021	Indigenous Interests	Email	<ul style="list-style-type: none"> <li>GCT provided Seabird Island Band with a presentation on Indigenous Interests. GCT requested a meeting to discuss the following:               <ul style="list-style-type: none"> <li>Capacity funding</li> <li>Commission of RBT2 and DP4 comparison report</li> <li>Business operations</li> </ul> </li> </ul>
April 29, 2021	Draft DPD and VC Selection	Meeting	<ul style="list-style-type: none"> <li>GCT and Seabird Island Band met to discuss the following:               <ul style="list-style-type: none"> <li>Project updates</li> <li>Seabird Island Band concerns</li> <li>Draft DPD</li> <li>Cooperative assessment process</li> <li>VC selection</li> </ul> </li> </ul>

**Table 65: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
(Cont'd.)	(Cont'd.)	(Cont'd.)	<ul style="list-style-type: none"> <li>○ Indigenous Interests.</li> <li>○ Effects of rail and truck traffic on Seabird Island Band</li> <li>• GCT requested a copy of a report by Dillon Consulting, which lists mitigation measures.</li> </ul>
May 7, 2021	Capacity Funding Agreement	Email	<ul style="list-style-type: none"> <li>• GCT provided Seabird Island Band with the revised draft Capacity Funding Agreement.</li> </ul>
May 13, 2021	Capacity Funding Agreement and Economic Opportunities	Meeting	<ul style="list-style-type: none"> <li>• GCT and Seabird Island Band met to discuss the following:               <ul style="list-style-type: none"> <li>○ Capacity Funding Agreement</li> <li>○ Seabird Island businesses</li> <li>○ Economic opportunities</li> <li>○ Dillon Traffic Impact report</li> <li>○ RBT2 and DP4 comparison study</li> </ul> </li> </ul>
May 17, 2021	Capacity Funding Agreement	Email	<ul style="list-style-type: none"> <li>• Seabird Island Band sent GCT the revised draft Capacity Funding Agreement.</li> </ul>
June 14, 2021	Capacity Funding Agreement	Email	<ul style="list-style-type: none"> <li>• GCT sent Seabird Island Band the finalized Capacity Funding Agreement for their signature.</li> </ul>

During early engagement, Seabird Island Band raised various issues relating to the Project. These issues, along with Indigenous interests raised by Seabird Island Band, and the corresponding GCT responses are summarized in Table 66.

**Table 66: Summary of Indigenous Interests and Issues Raised by Seabird Island Band.**

Indigenous Interests and Issues Raised	GCT Response
Concerns about mitigation measures and how and where offsets will take place. Concern that offset plans should include offsets for the Fraser River.	The Project will require an Authorization under the <i>Fisheries Act</i> , which will require the development of a Habitat Offsetting Plan. DFO may account for the uncertainty associated with the effectiveness of the habitat offsetting by requiring a greater amount of offsetting. Monitoring will also be required to demonstrate that the habitat offsetting has been successful. Typically, this will occur in years 1, 3 and 5 post-construction but can be longer and more frequent depending on the specific characteristics of the offsetting. Success criteria are defined in the <i>Fisheries Act</i> authorization along with adaptive management measures to be implemented if these criteria are not met. A financial guarantee must also be provided to DFO with the authorization application to enable DFO to deliver the offsetting objective and achieve success criteria if the proponent does not. GCT will continue to engage with Seabird Island Band on this issue during the Project planning and assessment phase.

**Table 66: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>Concerns about the Project’s contribution to the cumulative effects of development on the Fraser River food fishery. The key species impacted include eulachon, sockeye and spring (chinook) salmon, and sturgeon. The fishery has had to postpone fish drying for several years because of low numbers.</p>	<p>The Impact Assessment is required to assess potential Project effects on marine resources, fish, wildlife and Indigenous Interests. GCT will continue to engage with Seabird Island Band on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Seabird Island Bands’ Indigenous Interests identified in the draft Joint Guidelines.</p>
<p>Concerns about habitat compensation and asked GCT to consider the restoration of the Maria Slough as part of its habitat compensation plans. Maria Slough is an old cutoff channel running through the community that was modified by CP Rail to close the north end off from the river. The only water source comes from the mountains. Seabird Island wants to rehabilitate the channel as a fisheries nursery.</p>	<p>GCT is interested in Seabird Island Band’s Maria slough habitat compensation proposal and will look into discussions with DFO. The Project will require an Authorization under the <i>Fisheries Act</i>, which will require the development of a Habitat Offsetting Plan. DFO may account for the uncertainty associated with the effectiveness of the habitat offsetting by requiring a greater amount of offsetting. Monitoring will also be required to demonstrate that the habitat offsetting has been successful. Typically, this will occur in years 1, 3 and 5 post-construction but can be longer and more frequent depending on the specific characteristics of the offsetting. Success criteria are defined in the <i>Fisheries Act</i> authorization along with adaptive management measures to be implemented if these criteria are not met. A financial guarantee must also be provided to DFO with the authorization application to enable DFO to deliver the offsetting objective and achieve success criteria if the proponent does not. GCT will continue to engage with Seabird Island Band on this issue during the Project planning and assessment phase.</p>
<p>Concerns about the impacts on Indigenous businesses. Request for information as to whether GCT intended to set aside contracts for Indigenous businesses. Interest in economic opportunities the Project could provide Seabird Island Band.</p>	<p>GCT will continue to engage with Seabird Island Band about possible business and employment opportunities and accommodation options during the Project planning and assessment and as part of its pursuing as part of its supply chain planning.</p>
<p>Concerns about the level of detail for assessing accidents and malfunctions. Question as to whether accidents and malfunctions and emergency response were a VC.</p>	<p>The Impact Assessment is required to assess the potential for malfunctions and accidents, the potential Project environmental effects including effects to marine use and emergency response. Complete scoping of VCs will occur during the Impact Assessment phase. GCT will continue to engage with Seabird Island Band on these issues during the Project planning and assessment phase.</p> <p>GCT is planning a risk-based approach for the assessment of malfunctions and accidents that may affect VCs and Indigenous Interests identified for the Project. This could include assessment of the consequence of incidents and consider potential environmental, economic, social, cultural and health effects and effects to Indigenous Interests. GCT will continue to engage with Seabird Island Band on this issue during the Project planning and assessment phase.</p>

**Table 66: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
Concern with the adequacy of highway infrastructure and how that affects the sense of quiet in the community.	The list of VCs included in the Impact Assessment will be tailored to include Seabird Island Band input. GCT looks forward to further engagement with Seabird Island Band on this issue as the Impact Assessment progresses and VCs are defined.
Request for clarity as to why two projects (DP4 and RBT2) are being considered and indicated that if both were built it would have an “astronomical impact” on them.	GCT’s DP4 project is separate and distinct from RBT2, and based on forecasted demand, both projects would not be required at the same time. GCT is advancing the DP4 project pursuant to assessments that it can be the first to address market demands through a more sustainable and financially viable project. If RBT2 obtain environmental and other regulatory approvals, and the VFPA subsequently: (1) obtain approval from the Federal Government to increase its borrowing limits, (2) establish a sustainable business case, and (3) contract with a terminal operator, then GCT will evaluate the business case for DP4 at each such event and proceed accordingly. GCT provided information and available studies outlining the differences between the two projects, and provided information on key differences between the two projects including; the Project has a much smaller footprint than RBT2 and thus potentially less environmental impacts, GCT has the financial capability to build the Project without risk to taxpayers, and by default, DP4 has a terminal operator and customers which RBT2 does not. GCT will continue discussions with Seabird Island Band to address issues and concerns through engagement activities.

#### 8.4.21 Semiahmoo First Nation

This section describes GCT’s engagement with Semiahmoo First Nation during the Early Engagement Phase. Detailed records of key engagement activities, interests and issues raised by Semiahmoo First Nation are provided in Table 67.

GCT has engaged with Semiahmoo First Nation by email, letters, phone calls, and meetings. GCT will engage with Semiahmoo First Nation to determine preferred methods of engagement. As engagement progresses, GCT is prepared to modify the methods of engagement should that be requested by Semiahmoo First Nation. In the meantime, GCT will continue to engage Semiahmoo First Nation through various methods.

GCT initiated early engagement with Semiahmoo First Nation on February 27, 2019. Additional meetings were held between GCT and Semiahmoo First Nation in March and August of, 2020 where project updates were provided and IPD discussed. On February 26, 2021, GCT met with Semiahmoo First Nation to discuss the environmental concerns of the Semiahmoo First Nation. Semiahmoo First Nation has not yet submitted a notice to engage as a PIN to the BCEAO. GCT emailed Semiahmoo First Nation on April 7, 2021, requesting feedback on the draft DPD. GCT met with Semiahmoo First Nation between March and May, 2021, to discuss capacity funding, updates to the draft DPD, VCs, the Joint Guidelines and Semiahmoo First Nation’s Indigenous Interests.



**Table 67: Summary of Key Engagement with Semiahmoo First Nation.**

Dates	Subject	Interaction Type	Summary of Engagement
February 27, 2019	Introductory meeting	Meeting	<ul style="list-style-type: none"> <li>Introduction to GCT and GCT Deltaport expansion plans application.</li> </ul>
March 28, 2019	Judicial Review Applications	Email	<ul style="list-style-type: none"> <li>GCT provided an update on filed judicial review applications.</li> </ul>
October 15, 2019	Vancouver Fraser Port Authority	Email	<ul style="list-style-type: none"> <li>GCT provided Semiahmoo First Nation with a summary of past interactions with the VFPA.</li> </ul>
February 21, 2020	Engagement	Letter	<ul style="list-style-type: none"> <li>GCT requested further engagement with Semiahmoo First Nation.</li> </ul>
March 6, 2020	IPD	Meeting	<ul style="list-style-type: none"> <li>GCT met with Semiahmoo First Nation to discuss the IPD.</li> </ul>
March 26, 2020	IPD	Letter	<ul style="list-style-type: none"> <li>GCT followed up with Semiahmoo First Nation on a previous meeting about the IPD.</li> </ul>
June 9, 2020	Traditional Boundaries	Email	<ul style="list-style-type: none"> <li>GCT contacted Semiahmoo First Nation confirming the traditional boundaries map.</li> </ul>
August 16, 2020	Project Overview	Meeting	<ul style="list-style-type: none"> <li>GCT met with Semiahmoo First Nation to provide a project overview.</li> </ul>
August 26, 2020	Project Update	Meeting	<ul style="list-style-type: none"> <li>GCT met with Semiahmoo First Nation to provide project updates.</li> </ul>
January 26, 2021	Project update	Email	<ul style="list-style-type: none"> <li>GCT contacted Semiahmoo First Nation to re-introduce the GCT team and provide a project update.</li> </ul>
February 11, 2021	Project Participation	Email	<ul style="list-style-type: none"> <li>Semiahmoo First Nation emailed GCT to confirm interest in learning more about Traditional Use and Cumulative Effect Studies.</li> </ul>
February 25, 2021	Meeting Request	Email	<ul style="list-style-type: none"> <li>GCT requested a meeting with Semiahmoo First Nation to discuss a Capacity Funding Agreement and engagement approach.</li> </ul>
February 26, 2021	Environmental Concerns	Meeting	<ul style="list-style-type: none"> <li>GCT met with Semiahmoo First Nation to discuss environmental concerns.</li> </ul>
March 8, 2021	Capacity Funding	Phone Call	<ul style="list-style-type: none"> <li>GCT and Semiahmoo First Nation met to discuss and determine the details of a Capacity Funding Agreement.</li> </ul>
March 23, 2021	TUS	Video Call	<ul style="list-style-type: none"> <li>GCT and Semiahmoo First Nation met to discuss the carrying out of a traditional use study to assess DP4 and other nearby projects.</li> </ul>

**Table 67: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
April 7, 2021	Draft DPD Feedback Request	Email	<ul style="list-style-type: none"> <li>GCT sent Semiahmoo First Nation a copy of the draft DPD and requested feedback by May 7, 2021.</li> <li>GCT asked for a meeting to discuss the DPD, studies that Semiahmoo First Nation considers necessary in the review of the Project, and VCs.</li> </ul>
April 12, 2021	Traditional Territory	Email	<ul style="list-style-type: none"> <li>Semiahmoo First Nation provided GCT with an updated map of their Traditional Territory.</li> </ul>
May 3, 2021	DPD Timelines	Email	<ul style="list-style-type: none"> <li>Semiahmoo First Nation requested an extension to review the draft DPD and a complete copy of Semiahmoo First Nation's and GCT correspondence to facilitate their review.</li> </ul>
May 5, 2021	Draft DPD Timelines	Email	<ul style="list-style-type: none"> <li>GCT extended the timeline for Semiahmoo First Nations to review the draft DPD as per Semiahmoo First Nation's request.</li> </ul>
May 17, 2021	Capacity Funding	Email	<ul style="list-style-type: none"> <li>GCT provided Semiahmoo First Nation with the revised Initial Funding Agreement.</li> </ul>
May 31, 2021	VCs and Indigenous Interests Workshop	Meeting	<ul style="list-style-type: none"> <li>GCT met with Semiahmoo First Nation to discuss:               <ul style="list-style-type: none"> <li>Project updates</li> <li>VC Selection and Indigenous Interests</li> <li>Issues raised by Semiahmoo First Nation</li> </ul> </li> </ul>

Semiahmoo First Nation raised various issues relating to the Project. These issues, along with Indigenous Interests raised by Semiahmoo First Nation and the corresponding GCT responses, are summarized in Table 68.

**Table 68: Summary of Indigenous Interests and Issues Raised by Semiahmoo First Nation.**

Indigenous Interests and Issues Raised	GCT Response
Concerns about the spatial scope of the assessment, based on precedent, which did not include impacts to Semiahmoo First Nations territory across the US border	GCT encourages Semiahmoo First Nation to continue to raise the issue with the BCEAO and IAAC who are ultimately responsible for defining the spatial scope of the assessment. GCT understands that this is a key concern for Semiahmoo First Nation and will continue to engage on the issue during the Project planning and Impact Assessment Phase.

**Table 68: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
Concerns about the Impact Assessment process for smaller Indigenous nations like Semiahmoo First Nation.	GCT will continue to engage with Semiahmoo First Nation to understand this issue in more detail and explore potential solutions.
Interest in developing effective methods internally to ensure that Semiahmoo First Nation has to ability to properly review the Project.	GCT will continue to engage with Semiahmoo First Nation on this issue to facilitate their ability to properly review the Project.
Concerns about the lack of understanding about baselines and cumulative effects of the Salish Sea, including the carrying capacity of the South Salish Sea. Gaps exist in baseline data and additional studies need to be conducted.	The Impact Assessment will require the assessment of cumulative effects from past, present, and reasonably foreseeable projects, in combination with potential residual effects resulting from the Project. This may include, but is not limited to, potential cumulative effects on the environment, culture, and Indigenous Interests. GCT will continue to engage with Semiahmoo First Nation to identify specific areas where further information and data collection are required.
Concerns about the potential impacts to fishing and harvesting, in particular, crabs and clams. Shellfish as a foreshore food source has been lost over the years and it is believed the port and ferry causeways are creating a harmful circulation of water and sand at certain times of the year. Semiahmoo First Nation requests circulation studies.	The Impact Assessment is required to assess Project effects on marine use and Indigenous Interests. GCT will continue to engage with Semiahmoo First Nation on this issue during the Project planning and assessment phase, including how the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Semiahmoo First Nations' Indigenous Interests identified in the draft Joint Guidelines.
Concerns with cumulative effects as they pertain to climate change. Semiahmoo First Nation is a coastal community with low-lying territory under threat from wave and tidal action.	The Impact Assessment will require the assessment of cumulative effects from past, present, and reasonably foreseeable projects, in combination with potential residual effects resulting from DP4. The Project's contribution to climate change (i.e., GHGs) will also be assessed.
Concerns with lack of resourcing for projects in their traditional territory from previous proponents and government. In particular, this has led to a lack of effective internal understanding of traditional and current use. Concerns about the studies used to assess the project impacts as the studies that are made are not inclusive of areas significant to Semiahmoo First Nation. Interest in conducting a Traditional Use Study.	GCT will continue to work with Semiahmoo First Nation on determining the interests in conducting an IK study for the Project area.
Concerns about the Project impacts on ocean currents and wave action on-site and in Boundary Bays.	Alterations to coastal geomorphology will be considered in the assessment. This may include vessel wake. Alterations in coastal geomorphology may inform the effect pathway for the assessment of effects to VCs, such as, but not limited to, Fish and Fish Habitat and Archaeology. GCT will continue to engage with Semiahmoo First Nation on this issue during the Project planning and assessment phase.

**Table 68: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>Request that GCT should be looking at the value of Aboriginal people in building the Project and provide details of Aboriginal inclusion throughout the procurement process. Semiahmoo First Nation has requested a relationship with the prime contractor.</p>	<p>GCT will engage with Semiahmoo First Nation about possible business and employment opportunities and accommodation options during the Project planning and assessment phase.</p>
<p>Concerns about access to traditional fishing activities for Semiahmoo fishers. Developments are limiting traditional fishing activities in the surrounding area.</p>	<p>Based on regulatory requirements and engagement with Indigenous nations, GCT is drafting Joint Guidelines to define the Project assessment scope. GCT plans to assess access for Indigenous current and traditional fishing activities within the Impact Assessment. After we provide the draft Joint Guidelines to BC EAO and IAAC, they will consult with Indigenous nations and determine the final scope. GCT will continue to engage with Semiahmoo First Nation including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Semiahmoo First Nations' Indigenous Interests identified in the draft Joint Guidelines.</p>
<p>Concern about the effects of increased road and rail traffic. Road and rail accidents and incidents could potentially affect Semiahmoo First Nation, through impacts to the Serpentine and Nicomekl rivers, traditional food sources, and access for emergency vehicles.</p>	<p>GCT is planning a risk-based approach for the assessment of malfunctions and accidents that may affect VCs and Indigenous Interests and looks forward to further engagement with Semiahmoo First Nation on the scope of this important component of the Impact Assessment. Based on regulatory requirements and engagement with Indigenous nations, GCT is drafting Joint Guidelines to define the Project assessment scope. After GCT provides the draft Joint Guidelines to BC EAO and IAAC, they will consult Semiahmoo First Nation and determine the final scope.</p>
<p>Concern about the cumulative effects of this Project and other projects on the petroglyphs and culture sites on the foreshore at Boundary Bay. Request that GCT engage in discussions with Semiahmoo First Nation about protecting these areas and managing and monitoring the impacts.</p>	<p>Based on regulatory requirements and engagement with Indigenous nations, GCT is drafting Joint Guidelines to define the Project assessment scope. After GCT provides the draft Joint Guidelines to BC EAO and IAAC, they will consult Semiahmoo First Nation about mitigation plans and to determine the final scope. GCT is planning to consider coastal geomorphology and archaeology within the Impact Assessment.</p>
<p>Concerns and questions about the cumulative effects of this and other projects in the area on sedimentation. The sedimentation in the area is now muck, where it used to be white sand.</p>	<p>GCT acknowledges Semiahmoo First Nation's concern about sediment contamination. The statements in the DPD are based on previous studies and only provide the setting for the Project at this early stage. GCT is planning additional studies and to consider sediment quality within the Impact Assessment. Based on regulatory requirements and engagement with Indigenous nations, GCT is drafting Joint Guidelines to define the Project assessment scope, including in relation to potential sediment contamination.</p>

**Table 68: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
(Cont'd.)	After GCT provides the draft Joint Guidelines to BC EAO and IAAC, they will consult with Indigenous nations and determine the final scope. GCT looks forward to further engagement with Semiahmoo First Nation on this issue.
Concerns about deep sea dredging and the inadequate understanding of its impacts.	Dredging to extend the deep water access channel is required to support construction activities and enable ships to access the expanded terminal. The orientation of the dredge pocket is driven by the berth configuration and the existing dredge channel servicing berths 1 to 3. GCT will continue to engage with Semiahmoo First Nation on this issue during the Project planning and assessment phase.
Concerns about the potential project effects and ship discharges at sea and cumulative effects on traditional foods and subsequently on food security. As saltwater people, the majority of Semiahmoo First Nation’s food was from the waters.	<p>The Impact Assessment is required to assess the potential for malfunctions and accidents, the potential Project environmental effects including effects to marine use and emergency response. GCT will continue to engage with Semiahmoo First Nation on these issues during the Project planning and assessment phase.</p> <p>GCT is planning a risk-based approach for the assessment of malfunctions and accidents that may affect VCs and Indigenous Interests identified for the Project. This could include assessment of the consequence of incidents and consider potential environmental, economic, social, cultural and health effects and effects to Indigenous Interests. GCT will continue to engage with Semiahmoo First Nation on this issue during the Project planning and assessment phase.</p>

#### 8.4.22 Shxw’ow’hamel First Nation

This section describes GCT’s engagement with Shxw’ow’hamel First Nation during the Early Engagement Phase. Detailed records of engagement activities are provided in Table 69.

GCT has engaged with Shxw’ow’hamel First Nation by emails, a letter, and a phone call. GCT has asked Shxw’ow’hamel First Nation to specify their preferred methods of engagement for the Project. As engagement progresses, GCT is prepared to modify the methods of engagement should that be requested by Shxw’ow’hamel First Nation. In the meantime, GCT will continue to engage Shxw’ow’hamel First Nation through various methods.

GCT initiated engagement with Shxw’ow’hamel First Nation on May 29, 2020, via an introductory letter. On February 18, 2021, GCT provided Shxw’ow’hamel First Nation with an update on the DPD and anticipated schedule. On May 7, 2021, GCT invited Shxw’ow’hamel First Nation to attend a workshop to discuss the draft DPD, VC selection, Indigenous Interests, and draft Joint Guidelines.

Shxw’ow’hamel First Nation has not submitted a notice to engage as a PIN to the BCEAO.

**Table 69: Summary of Key Engagement with Shxw’ow’hamel First Nation.**

Dates	Subject	Interaction Type	Summary of Engagement
May 29, 2020	Project Introduction	Email, letter	<ul style="list-style-type: none"> <li>GCT provided information to Shxw’ow’hamel First Nation, including a copy of the presentation, details about the Project and engagement plan. GCT requested a meeting with Shxw’ow’hamel First Nation.</li> </ul>
September 11, 2020	Capacity Funding	Email	<ul style="list-style-type: none"> <li>GCT provided Shxw’ow’hamel First Nation with information about capacity funding.</li> </ul>
September 29, 2020	IPD	Email	<ul style="list-style-type: none"> <li>GCT provided an update on IAAC and BCEAO approval of IPD.</li> </ul>
October 15, 2020	Comment Period	Email	<ul style="list-style-type: none"> <li>GCT informed Shxw’ow’hamel First Nation about the comment period for the IPD.</li> </ul>
October 26, 2020	Meeting Request	Phone Call	<ul style="list-style-type: none"> <li>GCT contacted Shxw’ow’hamel First Nation to request a meeting to discuss the Project. Shxw’ow’hamel First Nation requested that GCT resend the Project information. GCT sent Shxw’ow’hamel First Nation all materials previously distributed materials sent.</li> </ul>
November 2, 2020	Virtual Open Houses	Email	<ul style="list-style-type: none"> <li>GCT informed Shxw’ow’hamel First Nation of upcoming Virtual Open Houses.</li> </ul>
February 10, 2021	Project Schedule	Email	<ul style="list-style-type: none"> <li>GCT provided a detailed Project schedule for Seabird Island Band’s review of the DPD and Joint Guidelines.</li> </ul>
February 18, 2021	DPD Update	Email	<ul style="list-style-type: none"> <li>GCT provided Shxw’ow’hamel First Nation with an update on the DPD and anticipated schedule.</li> </ul>
April 7, 2021	Draft DPD Feedback Request	Email	<ul style="list-style-type: none"> <li>GCT sent Shxw’ow’hamel First Nation a copy of the draft DPD and requested feedback by May 7, 2021.</li> <li>GCT asked for a meeting to discuss the DPD, studies that Shxw’ow’hamel First Nation considers necessary in the review of the Project, and VCs.</li> </ul>
April 15, 2021	Draft DPD Follow up	Email	<ul style="list-style-type: none"> <li>GCT emailed Shxw’ow’hamel First Nation confirming receipt of the DPD and requesting that they provide feedback on the draft DPD by May 7, 2021, and to schedule a meeting.</li> </ul>
May 7, 2021	Draft DPD	Email	<ul style="list-style-type: none"> <li>GCT invited Shxw’ow’hamel First Nation to attend a workshop to discuss the following: <ul style="list-style-type: none"> <li>Draft DPD</li> <li>VC selection</li> <li>Indigenous Interests</li> <li>Joint Guidelines</li> </ul> </li> </ul>

At the time of writing, Shxw’ow’hamel First Nation had not raised issues or Indigenous Interests relating to the Project. If issues or Indigenous Interests are identified by Shxw’ow’hamel First Nation through future engagement, GCT will endeavour to provide responses.

### 8.4.23 S’ólh Téméxw Stewardship Alliance

This section describes GCT’s engagement with S’ólh Téméxw Stewardship Alliance during the Early Engagement Phase and includes information regarding their notice to engage as a PIN. Detailed records of engagement activities, key interests and issues raised by S’ólh Téméxw Stewardship Alliance are provided in Table 70 and Table 71.

GCT has engaged with the S’ólh Téméxw Stewardship Alliance directly and through the People of the Rivers Referrals Office, see Table 70. GCT asked S’ólh Téméxw Stewardship Alliance to specify their preferred methods of engagement. S’ólh Téméxw Stewardship Alliance initially specified that GCT should forward Project documents to the Manager of Environment and Special Projects but have recently updated their engagement preferences to contact the Federal Liaison and the Director of the Stó:lō Research and Resource Management Centre. GCT will continue to engage S’ólh Téméxw Stewardship Alliance in the manner requested.

GCT initiated engagement with S’ólh Téméxw Stewardship Alliance via an introductory letter and email on April 1, 2020. On November 18, 2020, S’ólh Téméxw Stewardship Alliance notified GCT that they would prefer to engage with GCT separately from stakeholders. On April 13, 2021, GCT provided the S’ólh Téméxw Stewardship Alliance with a draft Initial Funding Agreement. On May 7, GCT met with S’ólh Téméxw Stewardship Alliance to discuss updates to the draft DPD, VCs, the Joint Guidelines and Malahat Nation’s Indigenous Interests.

The S’ólh Téméxw Stewardship Alliance submitted their notice to engage as a PIN to the BCEAO on December 4th, 2020 on behalf of their member nations (Aitchelitz First Nation, Chawathil First Nation, Cheam First Nation, Kwaw-Kwaw-Apilt First Nation, Shxwà:y Village, Skawahlook First Nation, Skowkale First Nation, Skwah First Nation, Soowahlie First Nation, Sq’éwlets, Squiala First Nation, Sumas First Nation, Tzeachten First Nation, Yakweakwioose First Nation, and Yale First Nation). The S’ólh Téméxw Stewardship Alliance has identified that they are interested in participating in engagement and will prepare a Project Impact Assessment and its potential impacts. The PIN notice indicated that the S’ólh Téméxw Stewardship Alliance’s technical team will provide a description of interests that may be affected by the Project.

**Table 70: Summary of Key Engagement with the S’ólh Téméxw Stewardship Alliance.**

Dates	Subject	Interaction Type	Summary of Engagement
March 31, 2020	Introduction	Letter	<ul style="list-style-type: none"> <li>GCT informed the S’ólh Téméxw Stewardship Alliance about the Project and requested input on the IPD and about the S’ólh Téméxw Stewardship Alliance engagement and participation preferences.</li> </ul>
May 13, 2020	Submission	Online submission and email	<ul style="list-style-type: none"> <li>GCT submitted an online application to the People of the Rivers Referrals Office to commence engagement with the S’ólh Téméxw Stewardship Alliance.</li> </ul>

**Table 70: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
May 22, 2020	Capacity Funding	Email	<ul style="list-style-type: none"> <li>GCT emailed the S'ólh Téméxw Stewardship Alliance to inform of the federal capacity funding program and offered to assist the S'ólh Téméxw Stewardship Alliance with the application process.</li> </ul>
May 22, 2020	Referral, Project Shapefiles	Email	<ul style="list-style-type: none"> <li>The People of the Rivers Referrals Office confirmed receipt of GCT submission and requested shapefiles.</li> </ul>
June 5, 2020	Project Shapefiles	Email	<ul style="list-style-type: none"> <li>GCT sent the shapefiles to the People of the Rivers Referrals Office.</li> </ul>
June 8, 2020	Referral, Project Shapefiles	Email	<ul style="list-style-type: none"> <li>The People of the Rivers Referrals Office confirmed receipt of the shapefiles and updated their referral status to the analysis stage.</li> </ul>
June 10, 2020	S'ólh Téméxw Stewardship Alliance Land Use Plan	Email	<ul style="list-style-type: none"> <li>The People of the Rivers Referrals Office sent GCT a map of the S'ólh Téméxw Stewardship Alliance LUP.</li> </ul>
September 29, 2020	IPD	Email	<ul style="list-style-type: none"> <li>GCT provided an update on IAAC and BCEAO approval of IPD.</li> </ul>
October 15, 2020	Comment Period	Email	<ul style="list-style-type: none"> <li>GCT informed S'ólh Téméxw Stewardship Alliance about the comment period for the IPD.</li> </ul>
November 19, 2020	Engagement	Email	<ul style="list-style-type: none"> <li>The S'ólh Téméxw Stewardship Alliance requested virtual meetings with GCT.</li> </ul>
February 2, 2021	DPD Update, Capacity Funding	Meeting	<ul style="list-style-type: none"> <li>GCT and People of the River Referrals Office met to discuss the following: <ul style="list-style-type: none"> <li>Project overview</li> <li>DPD updates</li> <li>Initial comments</li> <li>VCs</li> <li>Capacity Funding Agreement</li> </ul> </li> </ul>
February 9, 2021	Meeting	Email	<ul style="list-style-type: none"> <li>GCT sent presentation slides and met with S'ólh Téméxw Stewardship Alliance to discuss the DPD and initial comments.</li> <li>S'ólh Téméxw Stewardship Alliance indicated they would see if there was further information on the statement that DP4 was not proceeding.</li> </ul>



**Table 70: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
February 10, 2021	Project Schedule	Email	<ul style="list-style-type: none"> <li>GCT provided a detailed Project schedule for S'ólh Téméxw Stewardship Alliance's review of the DPD and Joint Guidelines.</li> </ul>
February 16, 2021	Project Information and Cumulative Effects Initiative	Email	<ul style="list-style-type: none"> <li>GCT provided S'ólh Téméxw Stewardship Alliance information regarding rail traffic.</li> <li>GCT provided a copy of the Federal Court decision GCT vs. VFPA (2020) and information on Indigenous-led cumulative effects initiative.</li> </ul>
March 1, 2021	Cumulative Effects	Email	<ul style="list-style-type: none"> <li>GCT provided S'ólh Téméxw Stewardship Alliance with a link to a video of the UNDRIP 2020 Conference where GCT committed to supporting the development of an Indigenous-led cumulative effects initiative.</li> </ul>
March 2, 2021	Reports	Email	<ul style="list-style-type: none"> <li>GCT provided the following documents to S'ólh Téméxw Stewardship Alliance:               <ul style="list-style-type: none"> <li>Assessment of Policy Options to Satisfy Canadian West Coast Container Port Capacity Needs</li> <li>Socio-economic Considerations for the Proposed RBT2 Project</li> <li>Global Container Terminal's Comments to the Review Panel on the Sufficiency of the Environmental Impact Statement</li> </ul> </li> </ul>
March 12, 2021	Rail and Truck Traffic	Email	<ul style="list-style-type: none"> <li>GCT sent S'ólh Téméxw Stewardship Alliance information about expected rail and truck traffic increases from the Project.</li> </ul>
March 16, 2021	Westshore Coal Facility	Email	<ul style="list-style-type: none"> <li>GCT sent S'ólh Téméxw Stewardship Alliance information that had been requested about the Westshore coal facility.</li> </ul>
April 7, 2021	Draft DPD Feedback Request	Email	<ul style="list-style-type: none"> <li>GCT sent S'ólh Téméxw Stewardship Alliance a copy of the draft DPD and requested feedback by May 7, 2021.</li> <li>GCT asked for a meeting to discuss the DPD, studies that S'ólh Téméxw Stewardship Alliance considers necessary in the review of the Project, and VCs.</li> </ul>

**Table 70: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
April 13, 2021	Capacity Funding	Email	<ul style="list-style-type: none"> <li>GCT provided S'ólh Téméxw Stewardship Alliance with the draft Capacity Funding Agreement.</li> </ul>
April 13, 2021	Information Request	Email	<ul style="list-style-type: none"> <li>GCT requested S'ólh Téméxw Stewardship Alliance to provide clarification on the relationship between Chawathil First Nation and S'ólh Téméxw Stewardship Alliance.</li> </ul>
April 13, 2021	Capacity Funding	Email	<ul style="list-style-type: none"> <li>GCT requested an agreement with S'ólh Téméxw Stewardship Alliance indicating that the listed First Nations are part of the S'ólh Téméxw Stewardship Alliance.</li> </ul>
April 15, 2021	Information	Email	<ul style="list-style-type: none"> <li>At their request, GCT provided the S'ólh Téméxw Stewardship Alliance the Judicial Review Appeal Court decision relating to the VFPA</li> </ul>
April 15, 2021	Information Request	Email	<ul style="list-style-type: none"> <li>GCT provided the S'ólh Téméxw Stewardship Alliance with a memo on the Project's fill and dredge area and volume as requested.</li> </ul>
May 7, 2021	Draft DPD	Email	<ul style="list-style-type: none"> <li>GCT invited the S'ólh Téméxw Stewardship Alliance to attend a workshop to discuss the following:               <ul style="list-style-type: none"> <li>○ Draft DPD</li> <li>○ VC selection</li> <li>○ Indigenous Interests</li> <li>○ Joint Guidelines</li> </ul> </li> </ul>

During early engagement, S'ólh Téméxw Stewardship Alliance raised various issues related to the Project. These issues, along with Indigenous Interests raised by S'ólh Téméxw Stewardship Alliance, and the corresponding GCT responses are summarized in Table 71.

**Table 71: Summary of Indigenous Interests and Issues Raised by the S’ólh Téméxw Stewardship Alliance.**

Indigenous Interests and Issues Raised	GCT Response
<p>The cumulative effects of the Project in consideration of all the other projects taking place within S’ólh Téméxw (Stó:lō traditional territory) and along the Fraser River.</p>	<p>The Impact Assessment is required to assess potential cumulative effects from other projects in combination with potential residual effects from DP4. The Impact Assessment is required to assess potential cumulative effects and effects to greenhouse gas emissions, culture, and Indigenous Interests from the Project. To assess the cumulative effects on a given VC, the Project residual effects will be assessed in combination with the potential effects of other past, present or reasonably foreseeable projects (projects that are either proposed (public disclosure) or have been approved to be built but are not yet built) and activities that overlap with the effects of the Project. A cumulative effects assessment is also a part of the assessment of effects to Indigenous Interests. Impact Assessment is required to assess potential cumulative effects from the Project. GCT will continue to engage with S’ólh Téméxw Stewardship Alliance on these issues during the Project planning and Impact Assessment phase. While not related to the DP4 project specifically, GCT also informed S’ólh Téméxw Stewardship Alliance about the SSIGA initiative related to the cumulative effects, and provided contact information if they have any interest in exploring collaboration potential.</p>
<p>The effects of the Project, especially on fish, fish habitat, air and water quality, wake and sediment release, and impacts to other marine and aquatic species and habitat.</p>	<p>The Impact Assessment is required to assess potential Project effects on marine resources, fish, fish habitat, air and water quality, wildlife, and Indigenous Interests. GCT will assess the alterations to coastal geomorphology which may include vessel wakes as a potential effect pathway. Alterations to coastal geomorphology will be considered in the assessment. This may include vessel wake. Alterations in coastal geomorphology may inform the effect pathway for the assessment of effects to VCs, such as, but not limited to, Fish and Fish Habitat and Archaeology. GCT will continue to engage with the S’ólh Téméxw Stewardship Alliance on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on S’ólh Téméxw Stewardship Alliances’ Indigenous Interests identified in the draft Joint Guidelines.</p>
<p>Concerns about the impacts of Short Sea Shipping on the Salish Sea and S’ólh Téméxw Stewardship Alliance ability to exercise cultural practices.</p>	<p>GCT is in discussions with Regulators about a Project design that accommodates a short sea shipping berth in anticipation that governments may mandate alternatives to trucking in the future, or dynamics in the market may change. To GCT’s knowledge, only two examples of short sea shipping exist in the region, and no other short sea shipping services are currently being planned outside of GCT Deltaport. As such, it is not possible at this stage to ascertain if, when or where such facilities outside of GCT Deltaport would be constructed. It is similarly not feasible to make predictions about the volumes of marine traffic associated with short sea shipping, or shipping routes, which are not clearly defined unlike shipping routes for container vessels (which GCT will be assessing, along with potential impacts associated with the construction of the short sea shipping berth).</p>

**Table 71: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
Concerns about in-fill and its impacts on the Salish Sea. Questions about the amount and type of fill and where the materials will be sourced from.	GCT will continue to engage with S'ólh Téméxw Stewardship Alliance on issues related to the amount and type of fill, including source, which have yet to be confirmed. Additional information will be provided as the impact assessment and Project design are advanced.
Concerns about the market viability for the Project.	GCT will engage with the S'ólh Téméxw Stewardship Alliance about the shipping container market and Project viability, including container capacity and market projections
Concerns and questions about conducting and including seismic studies in the Project assessment, since the Project activities are located within a subduction zone.	GCT acknowledges the concern. Additional studies to support the DP4 assessment have yet to be confirmed and will be informed by regulatory requirements and the future assessment process.
Concerns about the increased volume of rail traffic and the subsequent impacts to Indigenous communities as many of the rail lines run through communities. These impacts include noise, health and social impacts	GCT acknowledges S'ólh Téméxw Stewardship Alliance's concerns related to potential effects associated with rail activities and is in discussion with Regulators about these activities as part of the Impact Assessment, since they are incidental activities outside of GCT's care and control.
Concerns and questions about impacts to the Fraser River	GCT looks forward to engaging with S'ólh Téméxw Stewardship Alliance to better understand concerns related to the Project and potential interactions with the Fraser River.
Concern about impacts to biofilm and salmon due to the Project.	Through ongoing operations at Deltaport and early engagement activities focussed on DP4, GCT is well aware of the concerns and interests related to biofilm, and the protection of birds and salmon. These will be important factors to be considered for future field studies and the Project assessment. GCT will continue to engage with S'ólh Téméxw Stewardship Alliance on this issue during the Project planning and assessment phase.

#### 8.4.24 Songhees Nation

This section describes GCT's engagement with Songhees Nation during the Early Engagement Phase. Detailed records of engagement activities with Songhees Nation are provided in Table 72.

GCT has engaged with Songhees Nation by emails and by letter. GCT asked Songhees Nation to specify their preferred methods of engagement. As engagement progresses, GCT is prepared to modify the methods of engagement should that be requested by Songhees Nation. In the meantime, GCT will continue to engage Songhees Nation through various methods.

GCT initiated contact with Songhees Nation via email and an introductory letter on May 28, 2020. Between September and October 2020, GCT sent information to Songhees Nation about the IAAC and BCEAO approval of the IPD, as well as the initial Indigenous and public comment period. On May 7, 2021, GCT invited Songhees Nation to attend a workshop to discuss the draft DPD, VC selection, Indigenous Interests, and draft Joint Guidelines.

Songhees Nation has not submitted a notice to engage as a PIN to the BCEAO.

**Table 72: Summary of Key Engagement with Songhees Nation.**

Dates	Subject	Interaction Type	Summary of Engagement
May 28, 2020	Project introduction	Email and letter	<ul style="list-style-type: none"> <li>GCT sent a letter and presentation to Songhees Nation with background about the Project and a consultation and engagement plan. GCT requested a meeting with Songhees Nation.</li> </ul>
September 11, 2020	Capacity Funding	Email	<ul style="list-style-type: none"> <li>GCT provided Songhees Nation with information regarding capacity funding.</li> </ul>
September 29, 2020	IPD	Email	<ul style="list-style-type: none"> <li>GCT provided an update on IAAC and BCEAO approval of IPD.</li> </ul>
October 15, 2020	Comment Period	Email	<ul style="list-style-type: none"> <li>GCT informed Songhees Nation about the comment period for the IPD.</li> </ul>
November 2, 2020	Virtual Open Houses	Email	<ul style="list-style-type: none"> <li>GCT informed Songhees Nation regarding Virtual Open Houses.</li> </ul>
November 3, 2020	Meeting Request	Email	<ul style="list-style-type: none"> <li>GCT contacted Songhees Nation to provide a Project presentation.</li> </ul>
November 3, 2020	Request for Information	Email	<ul style="list-style-type: none"> <li>Songhees Nation requested information from GCT on the Project’s dredging requirements.</li> </ul>
November 18, 2020	Project Presentation	Email	<ul style="list-style-type: none"> <li>GCT requested an opportunity to provide a presentation to the Songhees Nation council.</li> </ul>
February 10, 2021	Project Schedule	Email	<ul style="list-style-type: none"> <li>GCT provided a detailed Project schedule for Songhees Nation review of the DPD and Joint Guidelines.</li> </ul>
February 24, 2021	DPD Update	Email	<ul style="list-style-type: none"> <li>GCT informed Songhees Nation it was drafting the DPD and asked them to provide feedback on the types of studies and VCs they would like included in the DPD.</li> </ul>
April 7, 2021	Draft DPD Feedback Request	Email	<ul style="list-style-type: none"> <li>GCT sent Songhees Nation a copy of the draft DPD and requested feedback by May 7, 2021.</li> <li>GCT asked for a meeting to discuss the DPD, studies that Songhees Nation considers necessary in the review of the Project, and VCs.</li> </ul>

**Table 72: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
April 15, 2021	Draft DPD	Email	<ul style="list-style-type: none"> <li>GCT requested Songhees Nation to provide feedback on the draft DPD.</li> </ul>
May 7, 2021	Draft DPD	Email	<ul style="list-style-type: none"> <li>GCT invited Songhees Nation to attend a workshop to discuss the following:               <ul style="list-style-type: none"> <li>Draft DPD feedback</li> <li>VC selection</li> <li>Indigenous Interests</li> <li>Joint Guidelines</li> </ul> </li> </ul>

At the time of writing, Songhees Nation had not raised issues or Indigenous Interests relating to the Project. If issues or Indigenous Interests are identified by Songhees Nation through future engagement, GCT will endeavour to provide responses.

#### 8.4.25 Squamish Nation

This section describes GCT’s engagement with Squamish Nation during the Early Engagement Phase. Detailed records of engagement activities, key interests and issues raised by Squamish Nation are provided in Table 73.

GCT has engaged with Squamish Nation by email and by letter. GCT asked Squamish Nation to specify their preferred methods of engagement. As engagement progresses, GCT is prepared to modify the methods of engagement should that be requested by Squamish Nation. In the meantime, GCT will continue to engage Squamish Nation through various methods.

GCT initiated contact with Squamish Nation via email and an introductory letter on July 10, 2020. On September 11, 2020, GCT sent Squamish Nation a Project Introduction letter asking if Squamish would like to participate in the engagement process.

Squamish Nation has not submitted a notice to engage as a PIN to the BCEAO and has not made an internal decision regarding participation. It is noted the project is not within the published traditional territories or consultative boundaries of the Squamish Nation.

**Table 73: Summary of Key Engagement with Squamish Nation.**

Dates	Subject	Interaction Type	Summary of Engagement
July 10, 2020	Engagement	Letter	<ul style="list-style-type: none"> <li>GCT informed Squamish Nation about Project updates and inquired about their interest in participating in the engagement process.</li> </ul>
September 11, 2020	Project Introduction	Letter	<ul style="list-style-type: none"> <li>GCT followed up with Squamish Nation to provide project information and inquire if Squamish Nation is interested in participating in the engagement process.</li> </ul>

**Table 73: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
February 10, 2021	Project Schedule	Email	<ul style="list-style-type: none"> <li>GCT provided a detailed Project schedule for Songhees Nation review of the DPD and Joint Guidelines.</li> </ul>
April 7, 2021	Draft DPD Feedback Request	Email	<ul style="list-style-type: none"> <li>GCT sent Squamish Nation a copy of the draft DPD and requested feedback by May 7, 2021.</li> <li>GCT asked for a meeting to discuss the DPD, studies that Squamish Nation considers necessary in the review of the Project, and VCs.</li> </ul>

At the time of writing, Squamish Nation had not raised issues or Indigenous Interests relating to the Project. If issues or Indigenous Interests are identified by Squamish Nation through future engagement, GCT will endeavour to provide responses.

#### 8.4.26 Sq'ewlets

This section describes GCT's engagement with Sq'ewlets during the early engagement phase. Detailed records of engagement activities, key interests and issues raised by Sq'ewlets are provided in Table 74.

GCT has engaged with Sq'ewlets directly by email, letter, and telephone and through the S'ólh Téméxw Stewardship Alliance and the People of the Rivers Referrals Office. GCT has requested that Sq'ewlets identify their preferred methods of engagement. As engagement progresses, GCT is prepared to modify the methods of engagement should that be requested by Sq'ewlets. In the meantime, GCT will continue to engage Sq'ewlets through various methods.

GCT initiated engagement with Sq'ewlets via an introductory letter and a presentation about the Project on May 28, 2020. On May 7, 2021, GCT invited Sq'ewlets to attend a workshop to discuss the draft DPD, VC selection, Indigenous Interests, and draft Joint Guidelines.

The S'ólh Téméxw Stewardship Alliance, of which Sq'ewlets is a member, submitted a notice to engage as a PIN on December 4, 2020. The S'ólh Téméxw Stewardship Alliance PIN notice states that they are interested in participating in engagement and consultation and will prepare an impact assessment of the Project and its potential impacts. The PIN notice indicated that the S'ólh Téméxw Stewardship Alliance's technical team will provide a description of interests that may be affected by the Project.

**Table 74: Summary of Key Engagement with Sq'ewlets.**

Dates	Subject	Interaction Type	Summary of Engagement
May 28, 2020	Letter and Presentation	Email, letter	<ul style="list-style-type: none"> <li>GCT sent a letter and presentation to Sq'ewlets with background about the Project and a consultation and engagement plan.</li> </ul>
June 10, 2020	Follow up	Email	<ul style="list-style-type: none"> <li>GCT sent a follow-up email regarding the Project and opportunities to meet.</li> </ul>

**Table 74: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
September 11, 2020	Capacity Funding	Email	<ul style="list-style-type: none"> <li>GCT followed up with Sq'ewlets regarding capacity funding, including attachments previously sent by the federal government.</li> </ul>
September 29, 2020	IPD	Email	<ul style="list-style-type: none"> <li>GCT provided an update on IAAC and BCEAO approval of IPD.</li> </ul>
October 15, 2020	Comment Period	Email	<ul style="list-style-type: none"> <li>GCT informed Sq'ewlets about the comment period for the IPD.</li> </ul>
October 26, 2020	Project Information	Phone Call	<ul style="list-style-type: none"> <li>GCT forwarded Sq'ewlets' reception Project information.</li> </ul>
October 27, 2020	Meeting Request	Email	<ul style="list-style-type: none"> <li>GCT requested a meeting with Sq'ewlets.</li> </ul>
November 2, 2020	Follow-up	Email	<ul style="list-style-type: none"> <li>GCT informed Sq'ewlets of Virtual Open Houses.</li> </ul>
February 10, 2021	Project Schedule	Email	<ul style="list-style-type: none"> <li>GCT provided a detailed Project schedule for Sq'ewlets review of the DPD and Joint Guidelines.</li> </ul>
February 17, 2021	DPD Update	Email	<ul style="list-style-type: none"> <li>GCT informed Sq'ewlets about the drafting of the DPD and asked them to provide feedback on the types of studies and VCs they would like included in the DPD.</li> </ul>
April 7, 2021	Draft DPD Feedback Request	Email	<ul style="list-style-type: none"> <li>GCT sent Sq'ewlets a copy of the draft DPD and requested feedback by May 7, 2021.</li> <li>GCT asked for a meeting to discuss the DPD, studies that Sq'ewlets considers necessary in the review of the Project, and VCs.</li> </ul>
April 15, 2021	Draft DPD	Email	<ul style="list-style-type: none"> <li>GCT requested Sq'ewlets to provide feedback on the draft DPD.</li> </ul>
May 07, 2021	Draft DPD	Email	<ul style="list-style-type: none"> <li>GCT requested a workshop with Sq'ewlets to discuss the following:               <ul style="list-style-type: none"> <li>Draft DPD feedback</li> <li>VC selection</li> <li>Indigenous Interests</li> <li>Joint Guidelines</li> </ul> </li> </ul>

The Interests and Issues identified by Sq'ewlets are summarized above in the S'ólh Téméxw Stewardship Alliance which is provided in Section 8.3.23, Table 71.



### 8.4.27 Stz’uminus First Nation

This section describes GCT’s engagement with Stz’uminus First Nation during the Early Engagement Phase and includes information regarding their notice to engage as a PIN. Detailed records of engagement activities, key interests and issues raised by Stz’uminus First Nation are provided in Table 75 and Table 76.

GCT has engaged with Stz’uminus First Nation by email, letter, video call, and in-person meetings. GCT asked Stz’uminus First Nation to specify their preferred methods of engagement. As engagement progresses, GCT is prepared to modify the methods of engagement should that be requested by Stz’uminus First Nation. In the meantime, GCT will continue to engage Stz’uminus First Nation through various methods.

GCT initiated engagement with Stz’uminus First Nation on February 25, 2020, via an introductory letter. GCT met with the Cowichan Nation communities of Cowichan Tribes, Halalt First Nation, Lyackson First Nation, Penelakut Tribe, and Stz’uminus First Nation on November 19, 2020, to discuss engagement, and drafting capacity funding agreement. GCT sent Stz’uminus First Nation a copy of the signed and executed Capacity Funding Agreement on February 9, 2021. In May 2021, GCT provided Stz’uminus First Nation with an updated DPD section for review and requested to meet with them to discuss capacity funding. On June 4, 2021, Stz’uminus First Nation sent GCT their draft DPD comments.

Stz’uminus First Nation submitted their notice to engage as a PIN to the BCEAO on December 8, 2020. In their notice, Stz’uminus First Nation stated that along with their fellow communities of the Cowichan Nation (Cowichan Tribes, Halaht First Nation, Lyackson First Nation, and Penelakut Tribe), Stz’uminus First Nation asserts and maintains their right to fish and harvest within the Project area.

**Table 75: Summary of Key Engagement with Stz’uminus First Nation.**

Dates	Subject	Interaction Type	Summary of Engagement
February 25, 2020	Introduction	Email	<ul style="list-style-type: none"> <li>GCT informed Stz’uminus First Nation about the Project and requested input on the IPD and about Stz’uminus First Nation’s engagement and participation preferences.</li> </ul>
March 17, 2020	Introduction	In-person	<ul style="list-style-type: none"> <li>GCT delivered a hard copy of the presentation on the Project and GCT’s Early Engagement Plan.</li> </ul>
May 22, 2020	Capacity Funding	Email	<ul style="list-style-type: none"> <li>GCT emailed Stz’uminus First Nation to inform them of the federal capacity funding program and offered to assist Stz’uminus First Nation with the application process.</li> </ul>

**Table 75: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
July 29, 2020	Presentation	Video call	<ul style="list-style-type: none"> <li>Meeting held with Cowichan Tribes, Halalt First Nation, Lyackson First Nation, Penelakut, Tribe and Stz'uminus First Nation.</li> <li>GCT gave a presentation on the Project and discussed questions and concerns about the Project.</li> </ul>
August 4, 2020	Engagement Plan	Email	<ul style="list-style-type: none"> <li>GCT informed Stz'uminus First Nation that the Project was entering the Early Engagement and Planning phase. GCT asked Stz'uminus to identify engagement protocols and communication preferences regarding key interests and issues.</li> </ul>
September 29, 2020	IPD Update	Email	<ul style="list-style-type: none"> <li>GCT provided an update on IAAC and BCEAO approval of IPD.</li> </ul>
October 15, 2020	Comment Period	Email	<ul style="list-style-type: none"> <li>GCT informed Stz'uminus First Nation about the comment period.</li> </ul>
October 28, 2020, and November 3, 2020	Virtual Open Houses	Email	<ul style="list-style-type: none"> <li>Stz'uminus First Nation indicated an interest in participating in Virtual Open Houses, inquired about logistics and participants.</li> </ul>
December 10, 2020	IPD Comments	Email	<ul style="list-style-type: none"> <li>Cowichan Tribes, Halalt First Nation, Lyackson First Nation, Penelakut First Nation, and Stz'uminus First Nation submitted their comments on the IPD to the BC EAO.</li> </ul>
January 28, 2021	IPD comments, MOU	Meeting	<ul style="list-style-type: none"> <li>GCT met with Cowichan Tribes, Halalt First Nation, Lyackson First Nation and Penelakut First Nation, and Stz'uminus First Nation to discuss:</li> </ul>
January 29, 2021	JSOIE	Email	<ul style="list-style-type: none"> <li>GCT sent Stz'uminus First Nation the final JSOIE.</li> </ul>
January 29, 2021	IAAC Funding	Email	<ul style="list-style-type: none"> <li>GCT provided Stz'uminus First Nation with additional information on IAAC capacity funding.</li> </ul>
February 9, 2021	Capacity Funding	Email	<ul style="list-style-type: none"> <li>GCT sent Stz'uminus First Nation a copy of the signed and executed Capacity Funding Agreement.</li> </ul>
February 10, 2021	Project Schedule	Email	<ul style="list-style-type: none"> <li>GCT provided a detailed Project schedule for Stz'uminus First Nation review of the DPD and Joint Guidelines.</li> </ul>

**Table 75: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
April 7, 2021	Draft DPD Feedback Request	Email	<ul style="list-style-type: none"> <li>GCT sent Stz'uminus First Nation a copy of the draft DPD and requested feedback by May 7, 2021.</li> <li>GCT asked for a meeting to discuss the DPD, studies that Stz'uminus First Nation considers necessary in the review of the Project, and VCs.</li> </ul>
April 13, 2021	Draft DPD Feedback Request	Email	<ul style="list-style-type: none"> <li>GCT sent Stz'uminus First Nation a copy of the draft DPD and requested feedback by May 7, 2021, and a meeting to discuss the DPD and studies that Stz'uminus First Nation considers necessary in the review of the project and to go over VCs.</li> </ul>
May 7, 2021	Draft DPD	Email	<ul style="list-style-type: none"> <li>GCT invited Stz'uminus First Nation to attend a workshop to discuss the following:               <ul style="list-style-type: none"> <li>Draft DPD</li> <li>VC selection</li> <li>Indigenous Interests</li> <li>Joint Guidelines</li> </ul> </li> </ul>
May 11, 2021	DPD Chapter 8	Email	<ul style="list-style-type: none"> <li>GCT provided an updated draft DPD Chapter 8 which included content which Stz'uminus First Nation had requested be included on April 29<sup>th</sup>. GCT, and requested feedback for the updates.</li> </ul>
May 14, 2021	Capacity Funding	Email	<ul style="list-style-type: none"> <li>GCT requested to meet with Stz'uminus First Nation to discuss capacity funding.</li> </ul>
May 19, 2021	Indigenous Interests Workshop Agenda	Email	<ul style="list-style-type: none"> <li>GCT proposed an agenda for the Indigenous Interests workshop which included discussing Indigenous Interests and VCs.</li> </ul>
June 4, 2021	Draft DPD Comments	Email	<ul style="list-style-type: none"> <li>Stz'uminus First Nation sent GCT their draft DPD comments.</li> </ul>

During early engagement, Stz'uminus First Nation raised various issues related to the Project. These issues, along with Indigenous Interests raised by the Cowichan Nations Alliance members and the corresponding responses from GCT, are summarized in Table 76.

**Table 76: Summary of Indigenous Interests and Issues Raised by Stz’uminus First Nation.**

Indigenous Interests and Issues Raised	GCT Response
Right to fish and harvest within the Project area.	The Impact Assessment is required to assess potential Project effects on Indigenous Interests and rights. GCT will continue to engage with Stz’uminus First Nation on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Stz’uminus First Nations’ Indigenous Interests identified in the draft Joint Guidelines.
Safe and culturally appropriate access to resources.	The Impact Assessment is required to assess marine use and marine navigation. GCT will continue to engage with Stz’uminus First Nation on this issue during the Project planning and assessment phase.
Aboriginal title and fishing and harvesting rights to Tl’uqtinus village site.	The Impact Assessment is required to assess potential Project effects on Indigenous Interests. GCT will continue to engage with Stz’uminus First Nation on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Stz’uminus First Nations’ Indigenous Interests identified in the draft Joint Guidelines.
Use of area for FSC purposes and economic opportunities, including Aboriginal Communal Fishing Licenses.	The Impact Assessment is required to assess the potential effects of the Project on Indigenous Interests. GCT will continue to engage with Stz’uminus First Nation on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Stz’uminus First Nations’ Indigenous Interests identified in the draft Joint Guidelines.
Recognition of all other Indigenous rights and title in the area	The Impact Assessment is required to assess potential Project effects on Indigenous Interests and rights. GCT will continue to engage with Stz’uminus First Nation on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Stz’uminus First Nations’ Indigenous Interests identified in the draft Joint Guidelines.
Principles of UNDRIP and of FPIC should be reflected in the document.	The Federal and Provincial governments have taken various steps to incorporate UNDRIP principles into the new Impact Assessment. GCT will be following this process during the Project planning and Impact Assessment phase.
Questions about initial habitat inventory, cumulative impact assessment and past studies around sediment, coal dust, disposal at sea, eelgrass and intertidal marsh mapping, water quality, noise, and fish habitat offsetting.	GCT’s technical personnel will engage with St’uzminus First Nation to identify specific areas where gaps exist, and where further information and studies are required.

**Table 76: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>Concerns and questions about mitigation and offsetting measures for impacts to fish/fish habitat, WMA, migratory birds, shellfish, marine flora, water quality, and SRKW during all Project phases and spill response.</p>	<p>GCT is committed to meaningful engagement for proposed mitigation and offsetting measures as the Impact Assessment progresses. GCT looks forward to engaging with Stz'uminus First Nation to address specific questions and concerns regarding mitigation and offsetting measures during construction, and spill response planning.</p>
<p>Concerns about the efficacy and efficiency of the Oceans Protection Plan and Short Sea Shipping, including its impacts on fish and fish habitat in the Fraser River and its interference with the Stz'uminus First Nation's ability to exercise harvesting rights in the area.</p>	<p>The Impact Assessment is required to assess potential effects on marine use, and marine navigation, the environment and Indigenous Interests and rights. GCT appreciates the importance of the Fraser River and supports the concept of re-establishing something similar to the FREMP by the relevant governments and agencies. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines for the Project and will be confirmed through additional engagement with Indigenous nations, stakeholders, the public, federal and provincial regulators. GCT will continue to engage with Stz'uminus First Nation on this issue during the Project planning and assessment phase.</p>
<p>Inclusion of communities in environmental and heritage monitoring.</p>	<p>GCT will continue to engage with Stz'uminus First Nation during the Project planning and assessment phase about opportunities for them to be included in future environmental and heritage monitoring plans.</p>
<p>Request for job opportunities and need for accommodations for workers from outside Metro Vancouver, and for GCT to provide information and assistance to Indigenous individuals who are interested in operational employment.</p>	<p>GCT is committed to providing information and assistance to Stz'uminus First Nation members who are interested in operational employment and facilitating engagement with the BC Maritime Employers Association. GCT will engage with Stz'uminus First Nation about possible job opportunities and accommodation options during the Project planning and assessment phase of the Project.</p>
<p>Concerns about the impacts of rock fill, pile driving, dredging material and road watering and potential spills on water quality, water clarity, habitat, foraging, eelgrass beds and critical habitat processes including nutrient transfer.</p>	<p>The Impact Assessment is required to assess the potential effects of the Project on wildlife, water quality, water clarity, vegetation and Indigenous Interests. GCT will continue to engage with Stz'uminus First Nation on these issues during the Project planning and assessment phase, Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Stz'uminus First Nations' Indigenous Interests identified in the draft Joint Guidelines.</p>

**Table 76: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>Important to effectively monitor water quality, water clarity, light, noise, and vibration levels during construction, throughout all phases of the Project, and beyond.</p>	<p>The Impact Assessment is required to assess potential Project effects on water quality and water clarity. The Impact Assessment will characterize sensory disturbances such as lighting during construction and operation in the noise and vibration and the light assessment sections. Potential effects of sensory disturbance to wildlife will be considered in the wildlife resources assessment. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines for the Project, and will be confirmed through additional engagement with Indigenous nations, stakeholders, the public, federal and provincial regulators.</p>
<p>Concerns and questions about the adverse impacts of scour protection, dust, noise, and light pollution from the Project.</p>	<p>The Impact Assessment will characterize sensory disturbances such as lighting during construction and operation in the noise and vibration and the light assessment sections. Potential effects of sensory disturbance to wildlife will be considered in the wildlife resources assessment. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines, and will be confirmed through additional engagement with Indigenous nations, stakeholders, the public, federal and provincial regulators.</p>
<p>Concerns that GCT has not outlined any commitments to work with our communities as to what specific benefits would best support our diverse needs and interests. Specifically in regard to the impacts a project of this magnitude would produce.</p>	<p>GCT has signed a Capacity Funding Agreement with Stz'uminus First Nation that provides for the development of a Memorandum of Understanding (MOU) that could lead to mutual benefit agreements with Stz'uminus First Nation.</p>
<p>Concerns and questions about effective collaboration, input during construction window, and time allotment for Cowichan Tribes review of developments and mitigation measures.</p>	<p>GCT will continue discussions with Stz'uminus First Nation on how to consult and collaborate in a respectful and meaningful way.</p>
<p>Old data from past projects should not be utilized as supplementary or supporting information to support this proposed Project.</p>	<p>GCT will provide Stz'uminus First Nation a list of secondary sources for validation purposes on topic areas relating to Indigenous Interests.</p>
<p>Concerns about using current accommodations and programs (i.e., TMX accommodations) to ensure a favourable Impact Assessment. Those programs are meant to be specific to the TMX pipeline and should not be relied on in other projects, only referenced as additional measures occurring in/adjacent to the Project area.</p>	<p>GCT will continue to engage with Stz'uminus First Nation on this issue during upcoming engagement activities.</p>

Table 77 summarizes issues and concerns raised by Stz’uminus First Nation in relation to the Project. At the request of the Stz’uminus First Nation in order to support their review of the DPD, the table also includes issues raised in response to another proposed project in the Roberts Bank area, and which GCT understands may also be applicable to the Project.

**Table 77 Summary of Indigenous Interests and Issues Raised by Stz’uminus First Nation Which May Also Be Applicable to the Project.**

Indigenous Interests and Issues Raised	GCT Response
<p>Concerns about the increased vessel traffic due to the Project and its effects on Stz’uminus First Nation hunting, fishing and harvesting grounds. This includes the disruption to migratory fish pathways (i.e., salmon) and birds dependent upon the river system in perpetuity.</p>	<p>The Impact Assessment is required to assess potential Project effects on marine resources, fish, wildlife and Indigenous Interests. GCT will continue to engage with Stz’uminus First Nation on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Stz’uminus First Nations’ Indigenous Interests identified in the draft Joint Guidelines.</p>
<p>Concerns about the Project-specific and cumulative impact of the erosion of intertidal and foreshore areas from vessel wake and the subsequent impacts on critical foreshore and intertidal habitats that support Stz’uminus First Nation community through resources.</p>	<p>Alterations to coastal geomorphology will be considered in the assessment. This may include vessel wake. Alterations in coastal geomorphology may inform the effect pathway for the assessment of effects to VCs, such as, but not limited to, Fish and Fish Habitat and Archaeology. GCT will continue to engage with Stz’uminus First Nation on this issue during the Project planning and assessment phase.</p>
<p>Concerns that the assessment of vessel wake should address wave period, cumulative effects, and shoreline topography, all of which are critical factors in assessing the potential erosion impacts of vessel wake.</p>	<p>The assessment of potential effects on coastal geomorphology may include an assessment of the effects of vessel wakes. The assessment could be focused on the maneuvering of vessels in the vicinity of the proposed project and consider the potential wake effects from ship traffic in the shipping corridors. GCT will continue to engage with Stz’uminus First Nation on this issue during the Project planning and assessment phase.</p>
<p>Concern that the Project area is within the area of Stz’uminus First Nation’s communal fishing license for conducting fishing for FSC purposes.</p>	<p>The Impact is required to assess potential Project effects on marine use and Indigenous Interests. GCT will continue to engage with Stz’uminus First Nation on this issue during the project planning and assessment phase, including how the preliminary list of potential effects on Indigenous Interests identified in the Joint Guidelines can incorporate Stz’uminus First Nation’s communal fishing license for conducting fishing for FSC purposes.</p>
<p>Concerns about the Project imposing further damage to intertidal resources which will impact Stz’uminus First Nation’s quantity and quality of marine harvest.</p>	<p>The Impact Assessment is required to assess potential Project effects on Indigenous Interests. GCT will continue to engage with Stz’uminus First Nation on this issue during Project planning and assessment phase, including how the preliminary list of potential effects on Indigenous Interests identified in the Joint Guidelines can incorporate Stz’uminus First Nation marine harvest of intertidal resources.</p>

**Table 77: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>Concerns about Project-related shipping effects on the reefs at Tumbo Island, as these reefs are of particular importance for fishing and for refuge.</p>	<p>The Impact Assessment will include an assessment of the vessels travelling in the shipping channels, including the ship traffic corridors near Tumbo Island. GCT will continue to engage with Stz’uminus First Nation on this issue during the Project planning and assessment phase.</p>
<p>Concerns about Project effects on waterfront areas, as waterfront areas are areas of high archaeological potential, with burials being unearthed on shorelines due to erosion. This further alienates Indigenous communities from their cultural places.</p>	<p>The Impact Assessment is required to assess potential Project effects on physical and cultural heritage. GCT will continue to engage with Stz’uminus First Nation on this issue during the Project planning and assessment phase, including on how the preliminary list of potential effects on Indigenous Interests identified in the Joint Guidelines can incorporate effects on areas of high archaeological potential and use of cultural places.</p>
<p>Concerns about the threat of this Project on biofilm and the subsequent effects on shore birds including the Western Sandpiper.</p>	<p>The Impact Assessment is required to assess potential Project environmental effects. Biofilm will be considered in the assessment of potential Project effects including as a pathway to potential effects to shore birds including the Western Sandpiper.</p> <p>The presence of biofilm in proximity to the Project is understood to be limited in comparison to the RBT2 project footprint. GCT plans to complete field surveys to better understand existing biofilm conditions and potential Project effects. GCT will continue to engage with Stz’uminus First Nation on this issue during the project planning and assessment phase.</p>
<p>Concerns about invasive species being brought into the area by Project vessels and the inadequacy of the current invasive species inspection system. Invasive species brought into the area negatively affect native ecosystems, which subsequently leads to further loss of access and opportunities that are integral to Indigenous rights and how they are exercised.</p>	<p>GCT acknowledges Stz’uminus First Nation’s concerns related to the introduction of invasive species and the current inspection system administered under Canadian legislation. GCT abides by all regulatory requirements for ships that are berthed at Deltaport but has no ability to direct or influence vessels at sea. GCT encourages Cowichan Tribes to communicate its concerns to Transport Canada who regulates activities such as ballast water exchange that could lead to the introduction of invasive species.</p>
<p>Concerns related to accidents and malfunctions:</p> <ul style="list-style-type: none"> <li>Concerns about the potential for spills in the Salish Sea and the subsequent effects to Stz’uminus First Nation way of life and Aboriginal Rights.</li> </ul>	<p>The Impact Assessment is required to assess the potential for malfunctions and accidents, the potential Project environmental effects including effects to marine use. GCT will continue to engage with Stz’uminus First Nation on these issues during the Project planning and assessment phase.</p>



**Table 77: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>(Cont'd.)</p> <ul style="list-style-type: none"> <li>Concerns and questions about container vessel casualty measures including emergency tub rescue, salvage capabilities, planning and collaborating on places of refuge, sea conditions and response gaps and worst-case vessel causality assessments.</li> <li>Concerns and questions about spill response to heavy bunker fuel oil including the fate of heavy bunker oils if spilled and extra measures to manage stranded and weathered bunker oil.</li> <li>Concerns and questions about shoreline cleanup measures, workforce and logistics for bunker oil and container-debris, shoreline response to Hazardous Noxious Substances (HNS), waste management of oily wastes, and container vessel loss exercises and planning.</li> </ul>	<p>(Cont'd.)</p> <p>GCT is planning a risk-based approach for the assessment of malfunctions and accidents that could affect VCs and Indigenous Interests identified for the Project. This could include assessment of the consequence of incidents and consider potential environmental, economic, social, cultural and health effects and effects to Indigenous Interests. GCT will continue to engage with Stz'uminus First Nation on this issue during the project planning and assessment phase.</p>
<p>Concerns about potential gaps in the assessment methodology including the project-related marine shipping geographic scope of 12 nautical mile limit.</p>	<p>The spatial scope of the Impact Assessment will be determined by the IAAC and the BCEAO. Notwithstanding this determination, GCT will work with Indigenous nations to determine potential options to assess Project-related marine shipping impacts in their traditional territory, which may extend beyond the spatial scope determined by the IAAC and the BCEAO. Such assessment will explore opportunities to partner with regulators and Indigenous nations on potential mitigation options and wider management initiatives.</p>
<p>Concerns about the comprehensiveness of the cumulative effects assessment. Stz'uminus First Nation recommends that:</p> <ul style="list-style-type: none"> <li>The Impact Assessment should consider all the impacts on the Salish Sea, including contamination from point and diffuse land-based sources, the multiple impacts on salmon and other fish stocks, and the impacts from all vessel traffic;</li> <li>Proper co-development of "short-, medium-, and long-term targets for addressing cumulative effects, including consideration of the feasibility of reducing total underwater noise, strike/collision risk of vessels with marine species, and key contaminant levels over time."</li> </ul>	<p>The Impact Assessment will require the assessment of cumulative effects from past, present, or reasonably foreseeable projects, in combination with potential residual effects resulting from DP4. Details of the Impact Assessment methodology have not yet been established for assessing potential cumulative changes to items such as underwater noise, strike/collision risk of vessels with marine species, and key contaminant levels over time. GCT will continue to engage with Stz'uminus First Nation through process planning when determining the specific methodology for the cumulative effects assessment.</p>

**Table 77: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
Overall concern that the Project will obstruct the exercise of Stz'uminus First Nation's constitutionally protected fishing rights and prevent the passing down of cultural practices and Traditional Knowledge to the younger generation.	The Impact Assessment is required to assess potential Project effects on Indigenous Interests, rights, and marine use. GCT will continue to engage with Stz'uminus First Nation on this issue during the Project planning and assessment phase, including how the preliminary list of potential effects on Indigenous Interests identified in the Joint Guidelines can incorporate Stz'uminus First Nation constitutionally protected fishing rights.

### 8.4.28 Tsartlip First Nation

This section describes GCT's engagement with Tsartlip First Nation during the Early Engagement Phase. Detailed records of engagement activities with Tsartlip First Nation are provided in Table 78.

GCT has engaged with Tsartlip First Nation by email, letter, and phone calls. GCT asked Tsartlip First Nation to specify their preferred methods of engagement. As engagement progresses, GCT is prepared to modify the methods of engagement should that be requested by Tsartlip First Nation. In the meantime, GCT will continue to engage Tsartlip First Nation through various methods.

GCT initiated engagement with Tsartlip First Nation on February 25, 2020, via email. GCT connected with Tsartlip First Nation twice in October 2020 to inform them about the initial comment period and to inquire regarding Tsartlip First Nation's consultation preferences in relation to its membership in the WSÁNEĆ Leadership Council. On May 12, 2021, GCT provided Tsartlip First Nation with the draft Initial Funding Agreement and draft DPD.

Tsartlip First Nation has not submitted a notice to engage as a PIN to the BCEAO.

**Table 78: Summary of Key Engagement with Tsartlip First Nation.**

Dates	Subject	Interaction Type	Summary of Engagement
February 25, 2020	Project Introduction	Email	<ul style="list-style-type: none"> <li>GCT informed Tsartlip First Nation about the Project, requested input on the IPD and asked about Tsartlip First Nation's engagement and participation preferences.</li> </ul>
March 17, 2020	Introduction	In-person	<ul style="list-style-type: none"> <li>GCT attempted to leave a hard copy of a presentation on the Project. Tsartlip First Nation's office was closed due to Covid-19.</li> </ul>
March 19, 2020	Presentation	Email	<ul style="list-style-type: none"> <li>GCT emailed Tsartlip First Nation a presentation on the Project.</li> <li>GCT invited Tsartlip First Nation to have a meeting to discuss the Project.</li> </ul>
April 6, 2020	Follow-Up	Email	<ul style="list-style-type: none"> <li>GCT requested a meeting with Tsartlip First Nation.</li> </ul>

**Table 78: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
April 29, 2020	Follow-Up	Email and Phone Call	<ul style="list-style-type: none"> <li>GCT followed up with Tsartlip First Nation regarding their meeting request.</li> </ul>
July 10, 2020	Follow-Up	Email	<ul style="list-style-type: none"> <li>GCT sent Tsartlip First Nation a follow-up email to discuss the Project.</li> </ul>
September 11, 2020	Capacity Funding	Email	<ul style="list-style-type: none"> <li>GCT provided Tsartlip First Nation information on the federal capacity funding program and offered to assist Tsartlip First Nation with the application process.</li> </ul>
September 29, 2020	IPD	Email	<ul style="list-style-type: none"> <li>GCT provided an update on IAAC and BCEAO approval of IPD.</li> </ul>
October 15, 2020	Comment Period	Email	<ul style="list-style-type: none"> <li>GCT informed Tsartlip First Nation about the comment period.</li> </ul>
October 27, 2020	Project Update	Email and phone call	<ul style="list-style-type: none"> <li>GCT connected with Tsartlip First Nation by phone and informed them about IAAC and BCEAO deadlines for the comment period.</li> <li>GCT asked about Tsartlip First Nation's preferences to be consulted in relation to its membership of the WSÁNEĆ Leadership Council.</li> </ul>
November 20, 2020	Follow up	Email	<ul style="list-style-type: none"> <li>GCT requested Tsartlip First Nation to have a follow-up meeting.</li> </ul>
February 10, 2021	Project Schedule	Email	<ul style="list-style-type: none"> <li>GCT provided a detailed Project schedule for Tsartlip First Nation review of the DPD and Joint Guidelines.</li> </ul>
April 7, 2021	Draft DPD Feedback Request	Email	<ul style="list-style-type: none"> <li>GCT sent Tsartlip First Nation a copy of the draft DPD and requested feedback by May 7, 2021.</li> <li>GCT asked for a meeting to discuss the DPD, studies that Tsartlip First Nation considers necessary in the review of the Project, and VCs.</li> </ul>
April 15, 2021	Draft DPD	Email	<ul style="list-style-type: none"> <li>GCT requested Tsartlip First Nation to provide feedback on the draft DPD and requested a meeting to discuss their recommendations for study reviews and VCs.</li> </ul>
April 28, 2021	Draft DPD	Email	<ul style="list-style-type: none"> <li>GCT provided Tsartlip First Nation an Impact Comparison Report and a link to the draft DPD. GCT offered to provide Tsartlip First Nation Council with an overview of Project timelines and discuss capacity funding opportunities.</li> </ul>

**Table 78: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
May 7, 2021	Draft DPD	Email	<ul style="list-style-type: none"> <li>GCT invited Tsartlip First Nation to attend a workshop to discuss the following:               <ul style="list-style-type: none"> <li>Draft DPD</li> <li>VC selection</li> <li>Indigenous Interests</li> <li>Joint Guidelines.</li> </ul> </li> </ul>
May 12, 2021	Capacity Funding	Email	<ul style="list-style-type: none"> <li>GCT provided Tsartlip First Nation with the draft capacity funding agreement.</li> <li>GCT indicated that IAAC and BCEAO may have additional funding to support Tsartlip First Nation engagement</li> <li>GCT requested Tsartlip First Nation provide to GCT the amount of the costs currently incurred and an engagement capacity estimate.</li> </ul>
May 12, 2021	Draft DPD	Email	<ul style="list-style-type: none"> <li>GCT provided Tsartlip First Nation with a copy of the draft DPD.</li> </ul>

At the time of writing, Tsartlip First Nation had not raised issues or Indigenous Interests relating to the Project. If issues or Indigenous Interests are identified by Tsartlip First Nation through future engagement, GCT will endeavour to provide responses.

#### 8.4.29 Tsawout First Nation

This section describes GCT’s engagement with Tsawout First Nation during the Early Engagement Phase. Detailed records of engagement activities with Tsawout First Nation are provided in Table 79.

GCT has engaged with Tsawout First Nation by meeting, phone call, and email. GCT has asked Tsawout First Nation to specify their preferred methods of engagement. As engagement progresses, GCT is prepared to modify the methods of engagement should that be requested by Tsawout First Nation. In the meantime, GCT will continue to engage Halalt First Nation through various methods.

GCT initiated engagement with Tsawout First Nation on March 17, 2020, via an in-person delivery of the Project introduction and GCT’s engagement presentation. On May 7, 2021, GCT invited Tsawout First Nation to attend a workshop to discuss the draft DPD, VC selection, Indigenous Interests, and draft Joint Guidelines.

Tsawout First Nation has not submitted a notice to engage as a PIN to the BCEAO.

**Table 79: Summary of Key Engagement with Tsawout First Nation.**

Dates	Subject	Interaction Type	Summary of Engagement
March 17, 2020	Introduction and Presentation	In-person delivery	<ul style="list-style-type: none"> <li>GCT delivered a hard copy of a presentation on the Project to the Tsawout First Nation office.</li> </ul>

**Table 79: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
April 8, 2020	Follow Up	Email	<ul style="list-style-type: none"> <li>GCT followed up with Tsawout First Nation to determine their interest in arranging a conference call to discuss the Project. GCT provided an electronic copy of the Project presentation.</li> </ul>
September 10, 2020	Follow Up	Phone Call	<ul style="list-style-type: none"> <li>GCT spoke with Tsawout First Nation. Tsawout First Nation informed GCT that they are interested in discussing the Project and will follow up to arrange a meeting.</li> </ul>
September 29, 2020	Follow Up and IPD	Phone Call	<ul style="list-style-type: none"> <li>Tsawout First Nation requested clarification on which Project was being consulted on. GCT advised Tsawout First Nation that this Project is separate from the RBT2 project, and informed Tsawout First Nation that GCT's Project is in the initial stages. GCT also indicated that approval was recently received on the IPD.</li> <li>Tsawout First Nation requested information on the Project and indicated that they would follow up with GCT.</li> </ul>
October 15, 2020	Comment Period	Email	<ul style="list-style-type: none"> <li>GCT informed Tsawout First Nation about the comment period.</li> </ul>
October 23, 2020	Follow Up	Phone Call	<ul style="list-style-type: none"> <li>GCT spoke with Tsawout First Nation and GCT re-sent the Project information and federal capacity funding details to Tsawout First Nation.</li> </ul>
November 2, 2020	Virtual Open Houses	Email	<ul style="list-style-type: none"> <li>GCT informed Tsawout First Nation regarding Virtual Open Houses.</li> </ul>
February 10, 2021	Project Schedule	Email	<ul style="list-style-type: none"> <li>GCT provided a detailed Project schedule for Tsawout First Nation review of the DPD and Joint Guidelines.</li> </ul>
February 24, 2021	DPD Update	Email	<ul style="list-style-type: none"> <li>GCT provided Tsawout First Nation with an update on the DPD and anticipated schedule.</li> </ul>
April 7, 2021	Draft DPD Feedback Request	Email	<ul style="list-style-type: none"> <li>GCT sent Tsawout First Nation a copy of the draft DPD and requested feedback by May 7, 2021.</li> <li>GCT asked for a meeting to discuss the DPD, studies that Tsawout First Nation considers necessary in the review of the Project, and VCs.</li> </ul>

**Table 79: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
April 15, 2021	Draft DPD	Email	<ul style="list-style-type: none"> <li>GCT requested that Tsawout First Nation provide feedback on the draft DPD and requested a meeting to discuss their recommendations for study reviews and VCs.</li> </ul>
April 28, 2021	Meeting	Email	<ul style="list-style-type: none"> <li>GCT requested a meeting with Tsawout First Nation to discuss the Project, and an RBT2 and DP4 comparison report.</li> </ul>
May 7, 2021	Draft DPD	Email	<ul style="list-style-type: none"> <li>GCT invited Tsawout First Nation to attend a workshop to discuss the following:               <ul style="list-style-type: none"> <li>Draft DPD</li> <li>VC selection</li> <li>Indigenous Interests</li> <li>Joint Guidelines.</li> </ul> </li> </ul>

At the time of writing, Tsawout First Nation had not raised issues or Indigenous Interests relating to the Project. If issues or Indigenous Interests are identified by Tsawout First Nation through future engagement, GCT will endeavour to provide responses.

#### 8.4.30 Tsawwassen First Nation

This section describes GCT’s engagement with Tsawwassen First Nation during the Early Engagement Phase and includes information regarding its notice to engage as a PIN. Detailed records of engagement activities, key interests and issues raised by Tsawwassen First Nation are provided in Table 80 and Table 81. GCT operates its existing Roberts Bank container terminal within sight of Tsawwassen’s primary village and as such has maintained a working relationship with the Nation since 1997.

GCT has been engaging with Tsawwassen First Nation since October 2016 while seeking feedback to inform Project early design. Engagements took place via email, letters, and in meetings with the Executive Council, Administration and Economic Development Corporation. Through most recent engagements, GCT has been directed to engage with the Manager of Policy and Government Services.

GCT’s early engagement to inform early Project design dates back to 2016 and has continued to engage as described in Table 80 below. . In Tsawwassen First Nation’s comments on the IPD and DPD Tsawwassen First Nation requested that GCT assess the Project according to their nine principles, which outline Tsawwassen First Nation’s assessment and engagement guidelines, and to assess Project impacts on Tsawwassen First Nation’s four pillars of life. GCT has provided more fulsome responses to these concerns in Table 80 below. GCT will continue to engage with Tsawwassen First Nation on this approach during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, and the list of potential effects on Tsawwassen First Nations’ Indigenous Interests identified in the draft Joint Guidelines. In May 2021, Tsawwassen First Nation informed GCT of their preferred archaeology consultant and discussed a capacity agreement and budget.

GCT met with Tsawwassen First Nation between April and June, 2021, to discuss capacity funding, updates to the draft DPD, VCs, the Joint Guidelines and Tsawwassen First Nation’s Indigenous Interests.

Tsawwassen First Nation submitted its notice to engage as a PIN to the BCEAO on November 27, 2020. In their notice, Tsawwassen First Nation outlined Tsawwassen First Nation’s Indigenous Interests in the Project Area and included comments on the IPD. Table 80 provides a summary of the Tsawwassen First Nation’s interests and issues relating to the Project.

**Table 80: Summary of Key Engagement with Tsawwassen First Nation.**

Dates	Subject	Interaction Type	Summary of Engagement
October 12, 2016	Introductory meeting	Meeting	<ul style="list-style-type: none"> <li>GCT met with the Executive Council and introduced the GCT Deltaport project expansion concept</li> </ul>
February 8, 2017	Follow up meeting	Meeting	<ul style="list-style-type: none"> <li>GCT presented findings of a study (PGL) generated from the Executive Council’s feedback.</li> </ul>
December 18, 2017	CAO introduction	Meeting	<ul style="list-style-type: none"> <li>Introductory meeting between new Tsawwassen First Nation CAO and GCT.</li> </ul>
June 11, 2018	Market and Project update	Meeting	<ul style="list-style-type: none"> <li>Briefing with Tsawwassen First Nation CAO.</li> </ul>
December 7, 2018	Tour	Meeting	<ul style="list-style-type: none"> <li>GCT provided a tour of GCT Deltaport to the Tsawwassen First Nation Chief, Executive Councillors, CAO and the Economic Development Corporation leadership.</li> </ul>
December 20, 2018	Project Offsetting and co-management concepts	Meeting	<ul style="list-style-type: none"> <li>GCT engaged to discuss potential Project offsetting and co-management approaches.</li> </ul>
January 7, 2019	Collaboration Agreement Term Sheet	Email	<ul style="list-style-type: none"> <li>In follow-up to discussions, GCT provided a draft Collaboration Agreement Term Sheet for feedback.</li> </ul>
April 15, 2019	Congratulatory note to the newly elected Chief	Letter	<ul style="list-style-type: none"> <li>Congratulatory note to the newly elected Chief and offer of a briefing and a tour of GCT facilities.</li> </ul>
August 29, 2019	Congratulatory note to the newly appointed CAO	Letter	<ul style="list-style-type: none"> <li>Congratulatory note to the newly appointed CAO and offer of a briefing and a tour of GCT facilities.</li> </ul>
October 31, 2019	Project overview	Meeting	<ul style="list-style-type: none"> <li>Project overview briefing and a tour of GCT Deltaport for CAO</li> </ul>
February 21, 2020	Meeting Request	Letter	<ul style="list-style-type: none"> <li>GCT requested a meeting with Tsawwassen First Nation.</li> </ul>

**Table 80: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
April 22, 2020	IPD engagement and feedback on how to engage	Video meeting	<ul style="list-style-type: none"> <li>GCT presented to the Manager of Policy and Government Services along with the Tsawwassen First Nation legal counsel.</li> </ul>
April 29, 2020	Meeting Follow Up	Email	<ul style="list-style-type: none"> <li>As part of meeting follow-up, GCT provided documents requested by Tsawwassen First Nation, including the 2010 MOU and draft Collaboration Agreement Term sheet.</li> </ul>
November 25, 2020	Project Introduction	Email	<ul style="list-style-type: none"> <li>GCT introduced the Project and informed Tsawwassen First Nation about capacity funding opportunities to support their participation in the consultation and engagement activities.</li> </ul>
November 27, 2020	PIN Notice	Email and Letter	<ul style="list-style-type: none"> <li>Tsawwassen First Nation submitted its Notice to participate in the Impact Assessment process for the Project.</li> </ul>
January 18, 2021	Assessment	Email	<ul style="list-style-type: none"> <li>GCT emailed Tsawwassen First Nation about engaging to further understand the possibility of a Tsawwassen First Nation-led assessment.</li> </ul>
February 11, 2021	Project Update	Email	<ul style="list-style-type: none"> <li>GCT provided Tsawwassen First Nation with a comprehensive update on the Project, including information on:               <ul style="list-style-type: none"> <li>The summary of issues</li> <li>DPD</li> <li>Expected schedule</li> <li>Capacity funding</li> </ul> </li> <li>GCT also expressed an interest in setting up regular meetings with Tsawwassen First Nation.</li> </ul>
February 17, 2021	Follow Up	Email	<ul style="list-style-type: none"> <li>Tsawwassen First Nation proposed a few dates for the initial meeting with GCT and requested that GCT send a draft agenda.</li> </ul>
February 24, 2021	Follow Up	Email	<ul style="list-style-type: none"> <li>GCT provided Tsawwassen First Nation with a draft agenda for the March 4, 2021, meeting.</li> </ul>
March 4, 2021	Meeting	Video meeting	<ul style="list-style-type: none"> <li>GCT and Tsawwassen First Nation met to discuss the status of the Project and Tsawwassen First Nation's preferred approaches, key issues and concerns, and requirements for participating in engagement activities. Opportunities for GCT to present to Tsawwassen First Nation's membership were also identified.</li> </ul>



**Table 80: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
April 7, 2021	Draft DPD Feedback Request	Email	<ul style="list-style-type: none"> <li>GCT sent Tsawwassen First Nation a copy of the draft DPD and requested feedback by May 7, 2021.</li> <li>GCT asked for a meeting to discuss the DPD, studies that Tsawwassen First Nation considers necessary in the review of the Project, and VCs.</li> </ul>
April 14, 2021	Archaeological consultation	Email	<ul style="list-style-type: none"> <li>GCT requested Tsawwassen First Nation to provide their archaeological consultant preferences.</li> </ul>
April 15, 2021	Archaeological Consultation	Email	<ul style="list-style-type: none"> <li>Tsawwassen First Nation provided GCT with the name of two of their preferred archaeological consultants.</li> </ul>
May 14, 2021	Draft DPD	Email	<ul style="list-style-type: none"> <li>Tsawwassen First Nation provided GCT with their draft DPD comments.</li> </ul>
May 25, 2021	Archaeological Consultation	Email	<ul style="list-style-type: none"> <li>GCT stated that Tsawwassen First Nation's two preferred archaeological consultants are not available and requested their opinion on a different firm.</li> </ul>
May 26, 2021	Archaeological Consultation	Email	<ul style="list-style-type: none"> <li>Tsawwassen First Nation informed GCT of their next preferred archaeology consultant.</li> </ul>
June 7, 2021	VCs and Indigenous Interests Workshop	Meeting	<ul style="list-style-type: none"> <li>GCT met with Tsawwassen First Nation to discuss:               <ul style="list-style-type: none"> <li>Project update</li> <li>Progress and refinement of VC selection</li> <li>Preliminary understanding of Tsawwassen First Nation's Indigenous Interests potential project effects</li> </ul> </li> <li>Tsawwassen First Nation identified issues and concerns and GCT responses to Tsawwassen First Nation comments on the revised DPD.</li> </ul>
June 30, 2021	Response to IPD and DPD comments	Letter	<ul style="list-style-type: none"> <li>GCT sent a letter to Tsawwassen First Nation with responses to comments that Tsawwassen First Nation provided on the IPD and DPD.</li> </ul>

**Table 80: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
July 7, 2021	VCs and Indigenous Interests Workshop	Meeting	<ul style="list-style-type: none"> <li>• GCT met with Tsawwassen First Nation to discuss:               <ul style="list-style-type: none"> <li>○ Project updates and assessment process</li> <li>○ Issues and concerns (i.e., Pillars and Principles)</li> <li>○ Candidate valued components and Indigenous Interests</li> <li>○ Indigenous Knowledge</li> </ul> </li> </ul>

During early engagement, Tsawwassen First Nation raised various issues related to the Project. These issues, along with Indigenous Interests raised by Tsawwassen First Nation and the corresponding GCT responses, are summarized in Table 81. Tsawwassen First Nation raised 29 issues associated with the IPD and shared an excerpt of its RBT2 panel submission, indicating that many of their concerns with that project apply to this Project. The IPD issues, summarized below, are marked with an asterisk, and the issues raised on the nearby project are documented below Table 82.

**Table 81: Summary of Indigenous Interests and Issues Raised by Tsawwassen First Nation.**

Indigenous Interests and Issues Raised	GCT Response
<p>Tsawwassen First Nation recommends assessing the Project through their four pillars of life, as they provide a clear understanding of Tsawwassen First Nation's concerns for potential Project effects on Tsawwassen First Nation's rights and interests:</p> <p>Pillar 1: Social and Human Health            Pillar 2: Harvesting Rights            Pillar 3: Cultural Heritage            Pillar 4: Stewardship and Governance</p> <p>These pillars were not provided to merely be considered under the analogous socioeconomic and environmental effects, they require assessment in and of themselves. Tsawwassen First Nation requests that GCT incorporate the above components into the DPD.</p>	<p>The Impact Assessment is required to assess potential Project effects on Indigenous Interests. Tsawwassen First Nation's section of the draft Joint Guidelines has been structured to reflect Tsawwassen First Nation's four pillars of life: Social and Human Health, Harvesting Rights, Cultural Heritage, and Stewardship and Governance. When finalized by the Regulators the Joint Guidelines will establish the requirements for assessing effects on Tsawwassen First Nation Indigenous Interests. GCT will continue to engage with Tsawwassen First Nation on this issue during the Project planning and assessment phase, including the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8, and the list of potential effects on Tsawwassen First Nations' Indigenous Interests identified in the draft Joint Guidelines.</p>
<p>Tsawwassen First Nation recommends following these nine principles when considering the Summary of Issues, DPD, and Tailored Impact Statement:</p> <ol style="list-style-type: none"> <li>1. Consider the nature and scope of rights as those rights are asserted, and how the rights might be impacted.</li> </ol>	<p>GCT signed an MOU with Tsawwassen First Nation in 2010 that outlines the Principles of Collaboration for working together. GCT is committed to working together with Tsawwassen First Nation in transparency, honesty, and integrity.</p>

\* Issues associated with IPD.

**Table 81: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>(Cont'd.)</p> <ol style="list-style-type: none"> <li>2. Assessing impacts on Aboriginal and treaty rights and title requires more than assessing environmental effects on the current use of lands and resources for traditional purposes or on physical and cultural heritage.</li> <li>3. Assessing impacts on the exercise of Aboriginal and treaty rights and title requires understanding the context of historical and contemporary cumulative effects in which rights are exercised. This context needs to be evaluated before looking at Project effects on those rights.</li> <li>4. The Impact Assessment should not be limited to site-specific effects but must consider all impacts on the exercise of rights.</li> <li>5. Utilizing an Indigenous perspective and IK is imperative.</li> <li>6. Consider Indigenous values, norms, and laws, where provided by a community.</li> <li>7. Engage the rights-bearing community during an assessment. The selection of methods and indicators for assessing impacts to Aboriginal and Treaty rights and title must be community-driven, where a community has elected to participate.</li> <li>8. Thresholds and measures to understand the potential effects of a project on the exercise of Aboriginal and Treaty rights, title and culture are to be utilized where they have been defined by the community.</li> <li>9. Impact Assessment to the exercise of Aboriginal and Treaty rights and title should consider a project's contribution to reconciliation. *</li> </ol>	<p>(Cont'd.)</p> <p>Tsawwassen First Nation's section of the draft Joint Guidelines has been structured to reflect Tsawwassen First Nation's nine principles. GCT will discuss with Tsawwassen First Nation how to adopt and best apply the nine principles for assessing effects to Tsawwassen First Nation rights that Tsawwassen First Nation identified in their PIN notice.</p>
<p>Concerns about impacts of the Project features including the proposed infrastructure changes, vessel movement, and industrial development consequences including land contamination, dust, noise, increased traffic, increased risk of accidents and malfunctions, increased stress, and cumulative effects on member's physical, mental, spiritual, and social well-being.</p>	<p>The Impact Assessment is required to assess the potential for malfunctions and accidents, and human health effects. GCT recognizes Tsawwassen First Nation as the nearest neighbour to the Project and is committed to ongoing engagement, collaboration, and resourcing support to facilitate Tsawwassen First Nation participation in the Impact Assessment.</p>

\* Issues associated with IPD.

**Table 81: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>Potential adverse effects on the Nation’s archaeological, paleontological, architectural, heritage, cultural, self-governance, and stewardship interests, and Tsawwassen First Nation laws.</p>	<p>The Impact Assessment is required to assess the potential Project effects on Indigenous Interests. GCT will continue to engage with Tsawwassen First Nation on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Tsawwassen First Nations’ Indigenous Interests identified in the draft Joint Guidelines.</p>
<p>Concern about the potential effects of “no float zones” and boat access.</p>	<p>The Impact Assessment is required to assess the potential Project effects on Indigenous Interests. Based on early engagement with Tsawwassen First Nation, and a subsequent preliminary study conducted by PGL Consultants (<a href="#">PGL Preliminary Environmental Impacts Comparison: RBT2 &amp; DP4</a>), the Project location is considerate of avoiding expansion of no-float zones at Roberts Banks, thus mitigating effects on the crabbing industry. GCT will continue to engage with Tsawwassen First Nation on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Tsawwassen First Nations’ Indigenous Interests identified in the draft Joint Guidelines.</p>
<p>Concern about the amount of dredging required for the Project and subsequent effects</p>	<p>The Impact Assessment is required to assess potential Project environmental effects. GCT will continue to engage with Tsawwassen First Nation in an effort to avoid and mitigate negative impacts on the environment.</p>
<p>Concern about the potential effects on habitats, biofilm, eelgrass, harvest crabs, migratory birds, SRKW, wildlife and plants. Continued access to Fraser River salmon was a key goal in negotiating Tsawwassen First Nation’s treaty. *</p>	<p>The Impact Assessment is required to assess potential Project effects on wildlife, vegetation, fish, and marine resources. GCT looks forward to further engagement with Tsawwassen First Nation on this issue as the Impact Assessment progresses and VCs are defined.</p>
<p>Impacts to Tsawwassen First Nation heritage culture, sense of identity, IK transfer and its subsequent negative effects on future generations.</p>	<p>The Impact Assessment is required to assess potential Project effects on Indigenous Interests and rights. GCT will continue to engage with Tsawwassen First Nation on this issue during Project planning and the assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Tsawwassen First Nations’ Indigenous Interests identified in the draft Joint Guidelines.</p>

\* Issues associated with IPD.

**Table 81: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>Concerns about invasive species being brought into the area from travelling ships and subsequent effects on native plants and other species and Tsawwassen First Nation members' ability to harvest for traditional medicine. In terms of mitigation, the Project represents an opportunity to undertake habitat restoration on Tsawwassen Lands to enable the return of native plant species. This could include an inventory of plant species native to Tsawwassen Lands and initiatives to promote their return, including through the control and removal of invasive plants. *</p>	<p>The Impact Assessment is required to assess potential Project effects on vegetation and Indigenous Interest. GCT acknowledges Tsawwassen First Nation's concerns related to the introduction of invasive species from travelling ships and effects on the ability to harvest traditional medicine. GCT abides by all regulatory requirements for ships that are berthed at Deltaport but has no ability to direct or influence vessels at sea. GCT encourages Tsawwassen First Nation to communicate its concerns to Transport Canada who regulates activities such as ballast water exchange that could lead to the introduction of invasive species. GCT will continue to engage with Tsawwassen First Nation about proposed invasive species mitigation and restoration measures.</p>
<p>Concerns about the potential for a continued decrease in the salmon population and negative impacts to other species that have social, cultural, and ceremonial values to members (e.g., SRKW).</p>	<p>The Impact Assessment is required to assess potential Project effects on wildlife and Indigenous Interests. SRKW are a critical species, and their protection and conservation are important to GCT. Marine mammals including SRKW will be included in the Impact Assessment, and if the Project proceeds to permitting, the Project will also require a permit under the <i>Species at Risk Act</i>. GCT will engage with Indigenous nations including Tsawwassen First Nation to co-determine how IK and Indigenous views will inform the Impact Assessment of potential effects where we have permission from Tsawwassen First Nation to do so. The assessment of potential effects may include effects on tourism and the broader ecosystem. GCT looks forward to further engagement with Tsawwassen First Nation on this issue as the Impact Assessment progresses and VCs are defined.</p>
<p>Impacts to food security resulting from decreased ability to access fishing and harvesting areas.</p>	<p>The Impact Assessment is required to assess potential Project effects on Indigenous Interests and rights. GCT will continue to engage with Tsawwassen First Nation on this issue during Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Tsawwassen First Nations' Indigenous Interests identified in the draft Joint Guidelines.</p>

\* Issues associated with IPD.

**Table 81: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>Concerns about changes to road and marine traffic, access to land, population growth, residential development and cost of living resulting in adverse impacts to Tsawwassen First Nation’s traditional economies and overall socio-economic indicators.</p>	<p>The Impact Assessment is required to assess the potential effects of the Project on Indigenous Interests and rights. GCT is already collaborating with municipal governments, Indigenous nations, BC Ministry of Transport and Infrastructure, and the rail companies, amongst others, through the Gateway Transportation Collaboration Forum to confirm any improvements that may be required to the network as a result of the proposed container terminal expansion projects at Roberts Bank.</p> <p>Under the funding agreement, the governments of Canada and British Columbia, the Tsawwassen First Nation, and the VFPA pre-funding on behalf of the industry, are collectively contributing up to CAD 245 million for a suite of projects including Deltaport Way/27B Avenue Improvements; Highway 17 at 80th Street (Tilbury) Intersection Upgrade; Highway 91 Connector/Highway 17/River Road (Sunbury) Interchange; Highway 91 Connector/ Nordel Way Intersection; Highway 91/Nordel Way Interchange. Of this, the federal government will contribute up to a maximum of CAD 82 million for this project. The Government of British Columbia is contributing approximately CAD 80 million. The Tsawwassen First Nation is contributing CAD 5.2 million. The VFPA is contributing ~CAD 8 million and the remaining ~CAD 70 million is a contribution from the industry, including GCT and its customers, via the Gateway Infrastructure Fee.</p> <p>GCT will continue to engage with Tsawwassen First Nation on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Tsawwassen First Nations’ Indigenous Interests identified in the draft Joint Guidelines.</p>
<p>Assessment of the cumulative effects on Tsawwassen First Nation territory, culture, self-governance, identity, and health.</p>	<p>The Impact Assessment will require the assessment of cumulative effects from past, present, or reasonably foreseeable projects, in combination with potential residual effects resulting from DP4. GCT will continue to engage with Tsawwassen First Nation on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Tsawwassen First Nations’ Indigenous Interests identified in the draft Joint Guidelines.</p>

\* Issues associated with IPD.

**Table 81: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>Concerns about visual disturbance from project construction and operation and its effects on community health and the transfer of intergenerational knowledge and language.*</p>	<p>The Impact Assessment will characterize sensory disturbances during construction and operation in the Noise and Vibration and the Light assessment sections. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines for the Project and will be confirmed through additional engagement with Indigenous nations, stakeholders, the public, federal and provincial regulators. GCT will continue to engage with Tsawwassen First Nation during the Project planning and Impact Assessment phase to better understand concerns relating to visual disturbance. The proximity of the Project to Tsawwassen First Nation means that GCT will take particular care in understanding and mitigating the impact of the Project on Tsawwassen First Nation and its citizens.</p>
<p>It is important to consider the historical and cumulative context in order to meaningfully account for the impacts that have already affected and continue to affect Tsawwassen First Nation’s ability to exercise their Aboriginal and treaty rights and title. This context must form the baseline for how Project effects on Tsawwassen First Nation are considered. This includes the impacts of increased road and marine traffic on Tsawwassen First Nation’s ability to access land and marine areas to gather food for social and ceremonial purposes. The cumulative effects assessment, particularly how it informs potential Project impacts to Tsawwassen First Nation rights and interests, must be informed by Tsawwassen First Nation comments provided throughout the consultation process.</p>	<p>The Impact Assessment is required to assess potential effects of the Project on Indigenous Interests and rights, including the context in which Indigenous Interests and rights have and continue to be practiced. GCT will continue to engage with Tsawwassen First Nation on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Tsawwassen First Nations’ Indigenous Interests identified in the draft Joint Guidelines.</p> <p>While not related to the Project specifically, GCT also informed Tsawwassen First Nation about the SSIGA initiative related to the cumulative effects, and we understand the Nation is engaged and exploring the collaboration potential.</p>
<p>Concern and interest about adequate capacity funding for Tsawwassen First Nation to participate in consultation activities, and conduct studies required to identify effect to Tsawwassen First Nation.</p>	<p>GCT has provided Tsawwassen First Nation with a term sheet toward a capacity funding IA. GCT will continue discussions with Tsawwassen First Nation on adequate funding for Tsawwassen First Nation to participate in the EA process during the Project planning and assessment phase.</p>
<p>Concerns that this Project will not advance the ongoing process of reconciliation with Canada and BC.</p>	<p>The Federal and Provincial governments have taken various steps to incorporate UNDRIP principles into the new Impact Assessment process. GCT will be following this process and will continue to engage with Tsawwassen First Nation during the Project planning and assessment phase.</p>

\* Issues associated with IPD.

**Table 81: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
Tsawwassen First Nation has made 53 requests of IAAC regarding the requirements it will be setting for GCT.	GCT will meet all requirements set by IAAC and will continue to collaborate with Tsawwassen First Nation and provide information and materials when requested.
Concerns about adequate Indigenous involvement in the Impact Assessment process prior to filing a DPD and the inclusion of Indigenous people in the process of identifying and considering alternatives to the Project. GCT must consider views, information and knowledge from Indigenous peoples and provide a detailed Project alternative analysis during the Project planning phase.*	Tsawwassen First Nation is our closest neighbour. GCT has communicated to the Chief in February 2019 our commitment to the “Tsawwassen First Nation First” principle, which is to inform and engage Tsawwassen First Nation leadership on all regulatory filings first, which GCT has done to date, and has committed to doing moving forward. With over a dozen engagements since then, GCT will continue discussions with Tsawwassen First Nation on information needs and how to consult and collaborate in a respectful and meaningful way.
Questions and concerns about mitigation and offsetting measures for the Project’s negative effects on biofilm, habitat and GHG emissions.	GCT is committed to reducing and avoiding GHG emissions and adverse effects on habitat and biofilm where possible throughout the advancement of the Project. GCT has held meetings with Tsawwassen First Nation on potential offsetting and co-management opportunities in December 2018, and remains open to further engagement to identify opportunities to avoid, minimize, restore, compensate, or offset potential adverse effects. GCT will continue to engage with Tsawwassen First Nation on this issue during the Project planning and assessment phase.
Project is likely to result in significant adverse effects to Tsawwassen First Nation Treaty rights and culture, including the right to fish and harvest crab, migratory birds, wildlife, and plants. Effects on species' habitats from the Project must be considered.	The Impact Assessment is required to assess potential Project effects on Indigenous Interests and rights, including the context in which Indigenous Interests and rights have and continue to be practiced. GCT will continue to engage with Tsawwassen First Nation on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Tsawwassen First Nations’ Indigenous Interests identified in the draft Joint Guidelines.
Concerns about Project effect on member’s knowledge and language about their home and the subsequent effects on member’s spiritual and cultural well-being.	The Impact Assessment is required to assess potential Project effects on Indigenous Interests and human health, including the context in which IK and language continue to be practiced. GCT will continue to engage with Tsawwassen First Nation on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Tsawwassen First Nations’ Indigenous Interests identified in the draft Joint Guidelines.

\* Issues associated with IPD.



**Table 81: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>To meaningfully understand the Project's potential effects on Aboriginal and Treaty rights and title and, consequently, what mitigations must be required, the Project assessment must address the factors that influence whether and how Tsawwassen First Nation members exercise their rights and culture. It is inadequate to merely assess the potential environmental effects of the Project as a proxy for effects on Tsawwassen First Nation's rights.</p>	<p>The Impact Assessment is required to assess the potential effects of the Project on Indigenous Interests. Tsawwassen First Nation's section of the draft Joint Guidelines has been structured to reflect Tsawwassen First Nation's four pillars of life: Social and Human Health, Harvesting Rights, Cultural Heritage, and Stewardship and Governance. When finalized by the Regulators the Joint Guidelines will establish the requirements for assessing effects on Tsawwassen First Nation Indigenous Interests. GCT will continue to engage with Tsawwassen First Nation on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Tsawwassen First Nations' Indigenous Interests identified in the draft Joint Guidelines.</p>
<p>Concerns that RBT2 Project is excluded from the Impact Assessment and concerns about the cumulative effects of both Projects being developed in the area.</p>	<p>GCT's DP4 project is separate and distinct from RBT2. GCT provided information and available studies outlining the differences between the two projects and provided information on key differences between the two projects including; DP4 has a smaller footprint than RBT2 and thus potentially less environmental effects, GCT has the financial capability to build the Project without risk to taxpayers, and by default, DP4 has a terminal operator and customers which RBT2 does not.</p> <p>GCT supports an approach for analysis of RBT2 and DP4 project comparison requested by many Indigenous communities. However, based on GCT's current data and analysis, it does not see a business case for both projects moving forward simultaneously – especially if RBT2 receives government subsidies. As such, RBT2 would not be included in the DP4 cumulative effects assessment as forecasted demand does not warrant both projects proceeding at the same time. GCT is advancing the DP4 project pursuant to assessments that it can be the first to address market demands through a more sustainable and financially viable project. If RBT2 obtain environmental and other regulatory approvals, and the VFPA subsequently: (1) obtain approval from the Federal Government to increase its borrowing limits, (2) establish a sustainable business case, and (3) contract with a terminal operator, then GCT will evaluate the business case for DP4 at each such event and proceed accordingly.</p>

\* *Issues associated with IPD.*

**Table 81: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
(Cont'd.)	GCT will continue discussions with Tsawwassen First Nation to address issues and concerns through engagement activities. GCT has added Table 82 below, which includes Tsawwassen First Nation’s comments on the RBT2 Project that may apply to the Project, and GCT’s responses to those comments.
Concerns and questions about why an additional berth requires dredging to facilitate ULCV, in light of existing ULCV handling capacity.	Dredging to extend the deep water access channel is required to support construction activities and enable ships to access the expanded terminal. The orientation of the dredge pocket is driven by the berth configuration and the existing dredge channel servicing berths 1 to 3.
Concerns about the lack of confirmation that construction and operation activity scheduling will consider or establish mitigation measures for timing windows related to Tsawwassen First Nation’s cultural practices.	The Impact Assessment is required to assess the potential effects of the Project on Indigenous Interests and culture. GCT is committed to meaningful engagement for proposed mitigation and offsetting measures as the Impact Assessment progresses. GCT looks forward to engaging with Tsawwassen First Nation to address specific questions and concerns regarding mitigation and offsetting measures during construction and operation.
Concerns that the proposed measures to avoid, minimize, restore, compensate, or offset potential effects to biofilm, and consequently to shorebirds and migratory birds, are inadequate and that substantive measures must be developed to address such effects. It is requested that GCT engage directly with Tsawwassen First Nation in order for Tsawwassen First Nation to meaningfully participate in the development of an offsetting plan and to review the list of past and present environmental studies that can be used to identify any knowledge gaps and assess how IK will be included in the Impact Assessment.	Project assessment is required to assess the potential effects of the Project on wildlife and vegetation. Biofilm will be considered in the assessment of potential Project effects including as a pathway to potential effects to shore birds including the Western Sandpiper. The presence of biofilm in proximity to the Project is understood to be limited in comparison to the RBT2 project footprint. GCT plans to complete field surveys to better understand existing biofilm conditions and potential Project effects. GCT will engage with Indigenous nations including Tsawwassen First Nation to co-determine how IK and Indigenous views will inform the Impact Assessment of potential effects where we have permission from Tsawwassen First Nation to do so. The assessment of potential effects may include effects on the broader ecosystem. GCT will continue to engage with Tsawwassen First Nation in an effort to avoid and offset adverse effects on the environment.
Request that the Human Health Impact Assessment use a holistic health approach with a focus on Indigenous Determinants of Health.	GCT will continue to engage Tsawwassen First Nation on the scope of the Human Health Impact Assessment, including options to address Indigenous Determinants of Health.

\* *Issues associated with IPD.*

**Table 82 Summary of Indigenous Interest and Issues Raised by Tsawwassen First Nation Which May Also Be Applicable to the Project.**

Indigenous Interests and Issues Raised	GCT Response
<p>Concerns that the Project will reduce access to fishing sites due to the increased vessel traffic, the risks for accidents and malfunctions and the risk of losing fishing gear. This will subsequently impact Tsawwassen First Nation’s ability to exercise their right to fish, particularly for crab, for food and commercial purposes.</p>	<p>GCT acknowledges the potential effects of increased marine shipping and issues associated with access and marine use. The Impact Assessment is required to assess the potential for malfunctions and accidents and the loss of fishing gear, potential Project effects on marine resources and Indigenous Interests, including traditional use. This could include assessment of the consequence of incidents and consider potential environmental, economic, social, cultural and health effects and effects to Indigenous interests. The Tsawwassen First Nation portion of the Joint Guidelines will consider effects on Tsawwassen First Nation’s ability to exercise their right to fish, including for crab, for food and commercial purposes.</p>
<p>Concerns about the impacts of accidents and malfunctions related to marine shipping on the human and environmental health and the economic livelihoods of Tsawwassen First Nation members.</p>	<p>The Impact Assessment is required to assess the potential for malfunctions and accidents on environmental and human health, and the economic livelihoods of Tsawwassen First Nation members.</p> <p>GCT is planning a risk-based approach for the assessment of malfunctions and accidents that could affect VCs and Indigenous Interests identified for the Project. This could include assessment of the consequence of incidents and consider potential environmental, economic, social, cultural and health effects and effects to Indigenous Interests. GCT will continue to engage with Tsawwassen First Nation on this issue during the project planning and assessment phase.</p>
<p>Concerns about Project impacts on marine fish and their habitat, including salmon, eulachon and sturgeon.</p>	<p>The Impact Assessment is required to assess potential Project effects on marine resources, fish, and wildlife. GCT will continue to engage with Tsawwassen First Nation on this issue during the Project planning and assessment phase.</p>
<p>Concern that sockeye salmon be assessed in the EA. Sockeye salmon have always been an important traditional food of Tsawwassen First Nation and are central to the wellbeing of Tsawwassen First Nation’s members.</p>	<p>The Impact Assessment is required to assess potential Project effects on marine resources and fish. GCT will continue to engage with Tsawwassen First Nation on this issue during the Project planning and assessment phase.</p>
<p>Concerns about the effects of underwater noise on the biota of the Salish Sea.</p>	<p>The Impact Assessment will characterize sensory disturbances during construction and operation in the Noise and Vibration and the Light assessment sections. Potential effects of sensory disturbance to wildlife will be considered in the Wildlife Resources assessment. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines for the Project, and will be confirmed through additional engagement with Indigenous nations, stakeholders, the public, federal and provincial regulators.</p>

**Table 82: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>Concerns about the adverse Project effects and the cumulative effects on marine mammals and the social, cultural, and Ceremonial values they hold. SRKW have significant cultural value and are critical for Tsawwassen First Nation’s members to exercise their right to practice their culture.</p>	<p>The Impact Assessment will require the assessment of cumulative effects from past, present, or reasonably foreseeable projects, in combination with potential residual effects resulting from DP4. The Impact Assessment is also required to assess Project effects on wildlife, Indigenous interest and culture.</p> <p>SRKW are a critical species and their protection and conservation are important to GCT. Marine mammals including SRKW will be included in the Project assessment, and, if the Project proceeds to permitting, the Project will also require a permit under the <i>Species at Risk Act</i>. Effects on SRKW have been included in the Tsawwassen First Nation section of the Joint Guidelines. GCT looks forward to further engagement with Tsawwassen First Nation on this issue as the Impact Assessment progresses and VCs are defined.</p>
<p>Concerns about the Project effects on nighttime light conditions at Brunswick Point and the subsequent effects on human health, cultural practices, knowledge transmission, migratory bird health, Tsawwassen First Nation harvesting, and future economic opportunities associated with site use by amateur astronomers.</p>	<p>The Impact Assessment is required to assess potential Project effects on Indigenous Interests. Tsawwassen First Nation's section of the draft Joint Guidelines has been structured to reflect Tsawwassen First Nation’s four pillars of life: Social and Human Health, Harvesting Rights, Cultural Heritage, and Stewardship and Governance. The Impact Assessment will characterize sensory disturbances such as lighting during construction and operation in the noise and vibration and the light assessment sections. Potential effects of sensory disturbance to wildlife will be considered in the wildlife resources assessment. The factors to be considered, and the scope of those factors, will be described in the Project Joint Guidelines and will be confirmed through additional engagement with Indigenous nations, stakeholders, the public, federal and provincial regulators.</p>
<p>Concerns about the adverse Project impacts on water quality and its subsequent effects on human health and quality of traditional food harvested near the Project site.</p>	<p>The Impact Assessment is required to assess potential Project effects on water quality, human health and Indigenous Interests. GCT will continue to engage with Tsawwassen First Nation on this issue during the Project planning and assessment phase.</p>
<p>Concerns about increased emissions due to the Project and the subsequent effect on air quality and human health.</p>	<p>The Impact Assessment is required to assess potential Project effects on air quality and human health. GCT is committed to reducing and avoiding GHG emissions where possible throughout the advancement of the Project. The Impact Assessment will describe the Project's contribution to the best achievable technologies to mitigate GHG emissions from the Project. GCT will continue to engage with Tsawwassen First Nation on this issue during the project planning and assessment phase.</p>

**Table 82: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>Concerns about the noise pollution from the Project, particularly during the night, and the subsequent effect on Tsawwassen First Nation residents, harvesters, and members engaging in recreational activities.</p>	<p>The Impact Assessment is required to assess potential Project effects on Indigenous Interests and will characterize sensory disturbances during construction and operation in the noise and vibration and the light assessment sections. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines for the Project, and will be confirmed through additional engagement with Indigenous nations, stakeholders, the public, federal and provincial regulators. GCT will continue to engage with Tsawwassen First Nation on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Tsawwassen First Nations' Indigenous Interests identified in the draft Joint Guidelines.</p>
<p>Concerns about contaminated surface water runoff and the subsequent effects on human health, the biophysical environmental and onsite habitat features.</p>	<p>The Impact Assessment is required to assess potential Project effects on water quality, human health, the environment, and wildlife. GCT will continue to engage with Tsawwassen First Nation on this issue during the Project planning and assessment phase.</p>
<p>Concerns about the geomorphological changes of the area over time, including natural systems and river dynamics of the Fraser River, which in turn affects Tsawwassen First Nation's ability to exercise treaty rights.</p>	<p>Alterations to coastal geomorphology will be considered in the assessment. This may include vessel wake. Alterations in coastal geomorphology may inform the effect pathway for the assessment of effects to VCs, such as, but not limited to, Fish and Fish Habitat and Archaeology. GCT will continue to engage with Tsawwassen First Nation on this issue during the project planning and assessment phase.</p>
<p>Concerns about increased sedimentation and the effects of erosion from vessel wake on foreshore areas.</p>	<p>Alterations to coastal geomorphology will be considered in the assessment. This may include vessel wake. Alterations in coastal geomorphology may inform the effect pathway for the assessment of effects to VCs, such as, but not limited to, Fish and Fish Habitat and Archaeology. GCT will continue to engage with Tsawwassen First Nation on this issue during the Project planning and assessment phase.</p>

### 8.4.31 Tseycum First Nation

This section describes GCT's engagement with Tseycum First Nation during the Early Engagement Phase. Detailed records of engagement activities with Tseycum First Nation are provided in Table 83.

GCT has engaged with Tseycum First Nation via email, letter, and phone calls. GCT has asked Tseycum First Nation to specify their preferred methods of engagement. As engagement progresses, GCT is prepared to modify the methods of engagement should that be requested by Tseycum First Nation. In the meantime, GCT will continue to engage Tseycum First Nation through various methods.

GCT initiated engagement with Tseycum First Nation on February 25, 2020, via an introductory letter. On May 7, 2021, GCT invited Tseycum First Nation to attend a workshop to discuss the draft DPD, VC selection, Indigenous Interests, and the draft Joint Guidelines.

Tseycum First Nation has not submitted a notice to engage as a PIN to the BCEAO.

**Table 83: Summary of Key Engagement with Tseycum First Nation.**

Dates	Subject	Interaction Type	Summary of Engagement
February 25, 2020	Introduction	Email	<ul style="list-style-type: none"> <li>GCT informed Tseycum First Nation about the Project and requested input on the IPD and Tseycum First Nation’s engagement and participation preferences.</li> </ul>
March 17, 2020	Introduction	In-person	<ul style="list-style-type: none"> <li>GCT visited the Tseycum First Nation’s office on March 17, 2020, to deliver a hard copy of a presentation on the Project.</li> </ul>
March 19, 2020	Introduction	Email	<ul style="list-style-type: none"> <li>GCT emailed Tseycum First Nation a presentation on the Project and requested a conference call to discuss the Project.</li> </ul>
April 6, 2020	Follow-Up	Email	<ul style="list-style-type: none"> <li>GCT emailed Tseycum First Nation to schedule a meeting.</li> </ul>
April 29, 2020	Follow-Up	Email and Phone Call	<ul style="list-style-type: none"> <li>GCT requested a potential meeting via phone call (voicemail) and email.</li> </ul>
July 10, 2020	Follow-Up	Email	<ul style="list-style-type: none"> <li>GCT emailed Tseycum First Nation to discuss the Project.</li> </ul>
September 11, 2020	Capacity Funding	Email	<ul style="list-style-type: none"> <li>GCT emailed Tseycum First Nation to inform them of the federal capacity funding program and offered to assist Tseycum First Nation with the application process.</li> </ul>
September 29, 2020	IPD	Email	<ul style="list-style-type: none"> <li>GCT provided an update on IAAC and BCEAO approval of IPD.</li> </ul>
October 15, 2020	Comment Period	Email	<ul style="list-style-type: none"> <li>GCT informed Tseycum First Nation about the comment period for the IPD.</li> </ul>
October 26, 2020	Project Interest	Phone Call	<ul style="list-style-type: none"> <li>GCT called Tseycum First Nation to determine interest in the Project.</li> </ul>
November 2, 2020	Virtual Open Houses	Email	<ul style="list-style-type: none"> <li>GCT emailed a reminder to Tseycum First Nation about Virtual Open Houses.</li> </ul>
February 10, 2021	Project Schedule	Email	<ul style="list-style-type: none"> <li>GCT provided a detailed Project schedule for Tseycum First Nation review of the DPD and Joint Guidelines.</li> </ul>
February 18, 2021	DPD Update	Email	<ul style="list-style-type: none"> <li>GCT emailed Tseycum First Nation to confirm that the Project update regarding the DPD was received.</li> </ul>

**Table 83: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
April 7, 2021	Draft DPD Feedback Request	Email	<ul style="list-style-type: none"> <li>GCT sent Tseycum First Nation a copy of the draft DPD and requested feedback by May 7, 2021.</li> <li>GCT asked for a meeting to discuss the DPD, studies that Tseycum First Nation considers necessary in the review of the Project, and VCs.</li> </ul>
April 15, 2021	Draft DPD	Email	<ul style="list-style-type: none"> <li>GCT requested Tseycum First Nation to provide feedback on the draft DPD and requested a meeting to discuss their recommendations for study reviews and VCs.</li> </ul>
April 28, 2021	Draft DPD	Email	<ul style="list-style-type: none"> <li>GCT sent Tseycum First Nation a link to the draft DPD and a PGL report comparing the environmental impacts of the RBT2 and DP4 projects.</li> </ul>
May 7, 2021	Draft DPD	Email	<ul style="list-style-type: none"> <li>GCT invited Tseycum First Nation to attend a workshop to discuss the following:               <ul style="list-style-type: none"> <li>Draft DPD</li> <li>VC selection</li> <li>Indigenous Interests</li> <li>Joint Guidelines.</li> </ul> </li> </ul>

At the time of writing, Tseycum First Nation had not raised issues or Indigenous Interests relating to the Project. If issues or Indigenous Interests are identified by Tseycum First Nation through future engagement, GCT will endeavour to provide responses.

#### 8.4.32 Tseil-Waututh Nation

This section describes GCT’s engagement with Tseil-Waututh Nation during the Early Engagement Phase. Detailed records of engagement activities, key interests and issues raised by Tseil-Waututh Nation are provided in Table 84 and Table 85.

GCT has engaged with Tseil-Waututh Nation by letter, emails, and meetings. GCT has requested Tseil-Waututh Nation to identify their preferred methods of engagement. Tseil-Waututh Nation has stated that it would like to be engaged in accordance with the Tseil-Waututh Nation laws and obligations set out in their Stewardship Policy (2009). GCT will continue to engage Tseil-Waututh Nation through various methods and in accordance with the Tseil-Waututh Nation Stewardship Policy.

GCT initiated engagement with Tseil-Waututh Nation via email on the Project on March 20, 2019, Tseil-Waututh Nation has informed GCT of their preferred method for recovering capacity funding related to Project reviews. GCT has been supporting that approach as requested. GCT met with Tseil-Waututh Nation between April and June, 2021, to discuss capacity funding, updates to the draft DPD, VCs, the Joint Guidelines and Tseil-Waututh Nation’s Indigenous Interests.

Tsleil-Waututh Nation has communicated to the BCEAO that they would like to engage as a PIN. In the Joint Summary of Issues and Engagement for the Project, Tsleil-Waututh Nation expressed concern about existing cumulative environmental effects and potential impacts to food sovereignty, community, culture and teachings. Tsleil-Waututh Nation also emphasized that the Project falls within its consultation area and is therefore subject to conditions set out in the Tsleil-Waututh Nation’s Stewardship Policy.

**Table 84: Summary of Key Engagement with Tsleil-Waututh Nation.**

Dates	Subject	Interaction Type	Summary of Engagement
March 20, 2019	Project Introduction	Email	<ul style="list-style-type: none"> <li>GCT provided information to Tsleil-Waututh Nation regarding GCT staff and interaction with Tsleil-Waututh Nation on the Preliminary Project Inquiry stage of the Project.</li> </ul>
March 19 – April 16, 2019	Environmental Assessment	Email	<ul style="list-style-type: none"> <li>Exchange of emails between GCT and GCT regarding the Tsleil-Waututh Nation environmental assessment process.</li> </ul>
July 5, 2019	Screening Fee	Email	<ul style="list-style-type: none"> <li>GCT emailed Tsleil-Waututh Nation regarding the initial screening fee and meeting proposal for August.</li> </ul>
August 28, 2019	Environmental Assessment Studies, Cumulative Effects	Meeting	<ul style="list-style-type: none"> <li>GCT met with Tsleil-Waututh Nation to discuss; cumulative effects and studies for the Application, indigenous-led environmental assessments, and how Tsleil-Waututh Nation should be referred to in early-stage studies and investigative work.</li> </ul>
September 9, 2019	Follow-Up	Email	<ul style="list-style-type: none"> <li>Follow-up from August meeting.</li> </ul>
February 21, 2020	Project Update	Email	<ul style="list-style-type: none"> <li>GCT provided Tsleil-Waututh Nation with an update letter as part of early engagement for the IPD.</li> </ul>
April 27, 2020	IPD	Email	<ul style="list-style-type: none"> <li>GCT informed Tsleil-Waututh Nation about early engagement meetings for the IPD.</li> </ul>
May 29, 2020	Meeting Agenda	Email	<ul style="list-style-type: none"> <li>Email regarding agenda for June 4<sup>th</sup> meeting.</li> </ul>
June 4, 2020	Project Update	Meeting	<ul style="list-style-type: none"> <li>GCT met with Tsleil-Waututh Nation to provide Project updates and input for IPD.</li> </ul>
October 26, 2020	IPD	Letter	<ul style="list-style-type: none"> <li>GCT sent Tsleil-Waututh Nation a letter about the IPD being submitted and seeing participation in the consultation period.</li> </ul>



**Table 84: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
November 4, 2020	Materials	Email	<ul style="list-style-type: none"> <li>GCT provided an update to the Tsleil-Waututh Nation regarding GCT's anticipated submission of materials to Tsleil-Waututh Nation.</li> </ul>
November 27, 2020	IPD Comments	Letter, Email	<ul style="list-style-type: none"> <li>Tsleil-Waututh Nation sent feedback on the IPD to IAAC and GCT.</li> </ul>
December 17, 2020	Meeting Request	Email	<ul style="list-style-type: none"> <li>Meeting request and confirmation for January 7, 2021.</li> </ul>
January 7, 2021	Project Update	Meeting, Email	<ul style="list-style-type: none"> <li>GCT met with Tsleil-Waututh Nation to discuss Project updates, timelines, and next steps. GCT suggested that Tsleil-Waututh Nation provide an initial funding agreement with estimates. Tsleil-Waututh Nation requested that follow-up meetings be arranged to review the DPD. GCT provided documents to Tsleil-Waututh Nation via email that included a workplan, information about navigational and fisheries closures, information regarding DFO's position on development east of the causeway, and a study comparing the Project with a proposed project at Roberts Bank.</li> </ul>
January 14, 2021	Meetings Notes	Email	<ul style="list-style-type: none"> <li>Email regarding meeting notes from January 7.</li> </ul>
February 11, 2021	Project status update	Email	<ul style="list-style-type: none"> <li>GCT communicated that the Joint Summary of Issues and Engagement has been issued. Provided timeline update on Tsleil-Waututh Nation could expect a draft of the DPD will be provided for feedback.</li> </ul>
February 22, 2021	Capacity Funding	Email	<ul style="list-style-type: none"> <li>Tsleil-Waututh Nation provided GCT with an invoice for engagement activities that took place between January 1, 2019, and December 31, 2020.</li> </ul>
March 3, 2021	Capacity Funding	Email	<ul style="list-style-type: none"> <li>GCT emailed Tsleil-Waututh Nation to confirm receipt of payment for capacity support and request a meeting to discuss the DPD.</li> </ul>

**Table 84: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
March 8, 2021	DPD Update	Email	<ul style="list-style-type: none"> <li>Tsleil-Waututh Nation confirmed receipt of payment for capacity support and requested an estimate for when a first draft of the DPD might be provided. Tsleil-Waututh has agreed to review the DPD upon receipt and a summary meeting has been set following this review.</li> </ul>
April 7, 2021	Draft DPD Feedback Request	Email	<ul style="list-style-type: none"> <li>GCT sent Tsleil-Waututh Nation a copy of the draft DPD and requested feedback by May 7, 2021.</li> <li>GCT asked for a meeting to discuss the DPD, studies that Tsleil-Waututh Nation considers necessary in the review of the Project, and VCs.</li> </ul>
May 11, 2021	Draft DPD	Meeting	<ul style="list-style-type: none"> <li>GCT met with Tsleil-Waututh Nation to discuss:               <ul style="list-style-type: none"> <li>GCT's Impact Assessment Approach</li> <li>Capacity Funding Update</li> <li>Tsleil-Waututh Nation's comments on the IPD and DPD</li> <li>Future Workshop</li> <li>Next Steps</li> </ul> </li> </ul>
May 19, 2021	IPD Feedback	Email	<ul style="list-style-type: none"> <li>GCT provided responses to Tsleil-Waututh Nation's IPD comments and a copy of DPD revisions for their review.</li> </ul>
June 1, 2021	DPD Comments Extension	Email	<ul style="list-style-type: none"> <li>Tsleil-Waututh Nation requested a DPD comment submission extension to July 3, 2021, as per their 45-day document review policy.</li> </ul>
June 3, 2021	DPD Comments Extension	Email	<ul style="list-style-type: none"> <li>GCT confirmed a DPD comment submission extension to July 3, 2021, noting the DPD will be submitted after July 3, 2021.</li> </ul>
July 7, 2021	DPD Comments	Email	<ul style="list-style-type: none"> <li>Tsleil-Waututh Nation sent GCT their comments on the draft DPD.</li> </ul>

During early engagement, Tsleil-Waututh Nation raised various issues relating to the Project. These issues, along with Indigenous Interests raised by Tsleil-Waututh Nation and the corresponding responses from GCT are summarized in Table 85.

**Table 85: Summary of Indigenous Interests and Issues Raised by Tsleil-Waututh Nation**

Indigenous Interests and Issues Raised	GCT Response
<p>Concerns about existing cumulative environmental effects leading to the loss and degradation of biodiversity, traditional food species, and habitats in the Fraser River and Burrard Inlet. This degradation is indicative of ongoing violations against ecological thresholds and Tsleil-Waututh Nation laws.</p>	<p>The Impact Assessment will require the assessment of cumulative effects from past, present, or reasonably foreseeable projects, in combination with potential residual effects resulting from DP4. The Impact Assessment will also assess potential effects on the environment, culture, and indigenous Interests. GCT will continue to engage with Tsleil-Waututh Nation on this issue during the Project planning and assessment phase.</p> <p>While not related to the Project specifically, GCT also informed Tsleil-Waututh Nation about the support toward indigenous-led initiatives assessing cumulative effects in South Salish Sea and provided contact information if they have any interest in exploring collaboration potential.</p> <p><a href="https://globalterminals.com/gct-puts-forward-200000-to-support-indigenous-led-initiatives-assessing-cumulative-effects-in-south-salish-sea/">https://globalterminals.com/gct-puts-forward-200000-to-support-indigenous-led-initiatives-assessing-cumulative-effects-in-south-salish-sea/</a></p>
<p>Impacts to Tsleil-Waututh Nation’s food sovereignty and efforts to ensure that every member and household can eventually live off the land and waters as their ancestors once did.</p>	<p>The Impact Assessment is required to assess the potential Project effects on Indigenous Interests including Harvesting and Subsistence activities and Cultural Continuation. GCT will continue to engage with Tsleil-Waututh Nation on this issue during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Tsleil-Waututh Nations’ Indigenous Interests identified in the draft Joint Guidelines.</p>
<p>Concerns about the impacts to community, culture, and teachings, which are linked to the well-being and survival and health of the SRKW population. The Proposed Project poses risks to the SRKW population as the Project site and marine shipping routes are located within SRKW’s critical habitat.</p>	<p>The Impact Assessment is required to assess potential environmental effects, as well as effects to Indigenous Interests including Cultural Continuation. GCT will continue to engage with Tsleil-Waututh Nation on these issues during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Tsleil-Waututh Nations’ Indigenous Interests identified in the draft Joint Guidelines.</p> <p>SRKW are a critical species and their protection and conservation are important to GCT. Marine mammals including SRKW will be included in the Project assessment, and if the Project proceeds to permitting, the Project will also require a permit under the Species at Risk Act. GCT will engage with Indigenous nations including Tsleil-Waututh Nation to co-determine how IK and Indigenous views will inform the Impact Assessment of potential effects where GCT has permission from Tsleil-Waututh Nation to do so. The assessment of potential effects may include effects on tourism and the broader ecosystem. GCT looks forward to further engagement with Tsleil-Waututh Nation on this issue as the Impact Assessment progresses and VCs are defined.</p>

**Table 85: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>Concerns that the Project may not respect the conditions of Tsleil-Waututh Nation’s Stewardship Policy, which outlines laws and requirements for meaningful consultation.</p>	<p>GCT acknowledges that the Project location falls within Tsleil-Waututh Nation’s consultation area and is thus subject to the conditions of the Tsleil-Waututh Nation Stewardship Policy (2009). GCT will engage with Tsleil-Waututh Nation in accordance with the laws and obligations set out in their Stewardship Policy.</p>
<p>Concerns about the impacts to fish, fish habitat and harvesting rights since the Project is adjacent to the Fraser River where Tsleil-Waututh Nation has harvested salmon and other marine fish such as crab, eulachon, herring, and sturgeon for millennia and continue to practice their fishing and harvesting rights in the mouth of the Fraser River.</p>	<p>The Impact Assessment is required to assess potential Project effects on marine resources, fish, wildlife and Indigenous Interests, including traditional use activities. Effects on fish, fishing, and traditional foods are also likely topics for inclusion in the Project’s assessment of potential effects to VCs. GCT will continue to engage with Tsleil-Waututh Nation on this issue during the project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Tsleil-Waututh Nations’ Indigenous Interests identified in the draft Joint Guidelines.</p>
<p>Concerns about increased levels of marine shipping activity, including short sea shipping, and its impacts on Tsleil-Waututh Nation’s access to the mouth of the Fraser where important fishing and crab harvesting areas are located. Increased levels of marine shipping could also negatively impact Tsleil-Waututh Nation member’s ability to travel in small vessels in relation to subsistence travel.</p>	<p>GCT acknowledges the potential effects of increased marine shipping and issues associated with access, marine use, marine mammals and cultural health. Impact Assessment is required to assess potential Project effects on marine resources, fish, wildlife and Indigenous Interests, including traditional use activities. Effects on fish, fishing, and traditional foods are also likely topics for inclusion in the Project’s assessment of potential effects to VCs. GCT acknowledges Tsleil-Waututh Nation’s concerns related to potential effects associated with short sea shipping, and is evaluating options to assess these activities as part of the Impact Assessment, since they are incidental activities outside of GCT’s care and control.</p> <p>GCT continues to engage with Indigenous nations to provide information on how to determine the spatial scope of the Impact Assessment including factors to be considered. The geographic scope is ultimately determined by the IAAC and the BCEAO.</p>
<p>Concern that the effects of marine vessel movements associated with short sea shipping, road, and rail activities should be considered part of the Project regardless of whether they occur outside of GCT’s lease boundary. These activities could result in adverse environmental, social, or economic effects, and adverse cumulative effects on VCs and need to be evaluated in the Impact Assessment.</p>	<p>GCT acknowledges Tsleil-Waututh Nations’ concerns related to potential effects associated with short sea shipping, road and rail activities and is in discussions with regulators about these activities since they are incidental activities outside of GCT’s care and control.</p> <p>GCT continues to engage with Indigenous nations to provide information on how to determine the spatial scope of the Impact Assessment including factors to be considered. The geographic scope is ultimately determined by the IAAC and the BCEAO.</p>
<p>Concerns about the potential impacts of larger vessels, particularly their potential impacts on marine mammals, compared to more frequent, smaller vessels.</p>	<p>The Impact Assessment is required to assess potential Project effects on marine resources, fish and wildlife. GCT will continue to engage with Tsleil-Waututh Nation on this issue during the Project planning and assessment phase.</p>

**Table 85: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>Concerns about the potential approval and construction of two major projects within the area, namely the Deltaport Expansion Berth 4 and RBT2 projects. Since 2011, Tsleil-Waututh Nation has spent considerable time and resources actively participating in the review of the VFPA's RBT2 Project.</p>	<p>Based on forecasted demand, both DP4 and RBT2 would not be required at the same time. GCT is advancing the DP4 project pursuant to assessments that it can be the first to address market demands through a more sustainable and financially viable project. If RBT2 obtain environmental and other regulatory approvals, and the VFPA subsequently: (1) obtain approval from the Federal Government to increase its borrowing limits, (2) establish a sustainable business case, and (3) contract with a terminal operator, then GCT will evaluate the business case for DP4 at each such event and proceed accordingly.</p> <p>GCT will continue to engage with Tsleil-Waututh Nation on this issue during project planning and assessment phase. GCT provided information and available studies outlining the differences between the two projects and provided information on key differences between the two projects including that the Project has a smaller footprint than RBT2 and thus potentially less environmental effects, GCT has the financial capability to build the Project without risk to taxpayers, and by default, DP4 has a terminal operator and customers, which RBT2 does not.</p>
<p>Concerns about the lack of detail in the IPD on the operation phase of the short sea shipping berth, including short sea shipping routes, other proposed short sea shipping terminals or anticipated volumes of short sea shipping traffic. The viability of short sea shipping in the Port of Vancouver needs to be determined and if deemed feasible, operational details need to be provided in the DPD. Otherwise, the short sea shipping component of DP4 should be removed.</p>	<p>GCT is pursuing a Project design that accommodates a short sea shipping berth in anticipation that governments may mandate alternatives to trucking in the future, or dynamics in the market may change. To GCT's knowledge, only two examples of short sea shipping exist in the region, and no other short sea shipping services are currently being planned outside of GCT Deltaport. As such, it is not possible at this stage to ascertain if, when or where such facilities outside of GCT Deltaport would be constructed. It is similarly not feasible to make predictions about the volumes of marine traffic associated with short sea shipping, or shipping routes, which are not clearly defined unlike shipping routes for traditional container vessels (which GCT will be assessing, along with potential impacts associated with the construction of the short sea shipping berth).</p> <p>GCT continues to engage with Indigenous nations to provide information on how to determine the spatial scope of the Impact Assessment including factors to be considered. The geographic scope is ultimately determined by the IAAC and the BCEAO.</p>
<p>Concerns about the cumulative effects on the productive ecosystem within the Project location, including the health of the mudflats, eelgrass, biofilm, marine mammals, fish, crab, and other wildlife. Roberts Bank has already been impacted due to the placement of the existing Roberts Bank terminal and surrounding infrastructure including BC Ferries.</p>	<p>The Impact Assessment is required to assess potential cumulative effects on the environment from the Project and to assess potential Project impacts on the environment. GCT will continue to engage with Tsleil-Waututh Nation in an effort to avoid and mitigate adverse effects to the environment.</p> <p>Based on preliminary studies, the Project location is considerate of avoiding biofilm as migratory bird habitat and chinook salmon habitats on the north side of the causeway.</p>

**Table 85: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
(Cont'd.)	<p>(Cont'd.)</p> <p>Biofilm will be further considered in the assessment of potential Project effects including as a pathway to potential effects to shore birds including the Western Sandpiper. The presence of biofilm in proximity to the Project is understood to be limited in comparison to the RBT2 project. GCT plans to complete field surveys focused on biofilm in 2021/2022. GCT understands that one of the main threats from the project on biofilm is indirect, via changes to salinity. The Project inter-causeway area is a fully marine environment (unlike north of the causeway, where salinity changes seasonally with the freshet). There is no expectation that the project will alter salinity, but further assessment is required. GCT will continue to engage with Tsleil-Waututh Nation on this issue during the Project planning and assessment phase.</p>
<p>Cumulative effects assessment must use pre-contact baseline not present conditions and must address climate change, cultural heritage, and intangible cultural heritage. Cumulative effects assessment should also be assessed beyond the life of the project and include the “40 different infrastructure projects being advanced by the Greater Vancouver 2030 Program to expand existing off terminal road and rail infrastructure.”</p>	<p>The Impact Assessment is required to assess potential cumulative effects and Project effects on greenhouse gas emissions, culture, and Indigenous Interests. To assess the cumulative effects on a given VC, the residual effects of the Project will be assessed in combination with the potential effects of other past, present or reasonably foreseeable Projects (Projects that are either proposed (public disclosure) or have been approved to be built but are not yet built). The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines for the Project. The IAAC and BCEAO will consult with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuance of the final Joint Guidelines.</p>
<p>Concern that increased emissions from marine vessels, cargo handling, and vehicle movements will contribute further to climate change. Tsleil-Waututh members have observed the effects of climate change in our territory for decades. The existing cumulative environmental effects leading to the loss and degradation of biodiversity, traditional food species and habitats in the Fraser River and Burrard Inlet are indicative of ongoing violations against ecological thresholds and TWN laws. Impacts of climate change will exacerbate and further contribute to adverse cumulative environmental effects through our territory.</p>	<p>As per the ECCC guidelines for the Strategic Assessment of Climate Change, the DP4 assessment is required to calculate total project emissions, however, GHG emissions are also provided on an annual basis in the DPD. The worst case is that these emissions would continue beyond 2050. However, GCT is continuing to explore the potential for achieving net-zero emissions by 2050 and has a history of successful emissions reduction at GCT Deltaport. GCT is committed to addressing the issue of climate change and reducing and avoiding GHG emissions where possible throughout the advancement of the Project. The Impact Assessment will describe the Project's contribution to best achievable technologies to mitigate GHG emissions and other potential sources of climate change from the Project and address the extent to which the effects of the Project hinder or contribute to BC and Canada's environmental obligations and climate change commitments. GCT appreciates Tsleil-Waututh Nation providing reference to their Climate Change Vulnerabilities Report which GCT will review and consider as the Project design advances.</p>

**Table 85: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>(Cont'd.) Please refer to Tsleil-Waututh Nation’s Climate Change Vulnerabilities Report detailing how Tsleil-Waututh Nation is and anticipates to be impacted by the threats from climate change. Request that GCT provide a detailed plan on how it intends to meet provincial and federal climate change goals including the Government of Canada’s commitment to net-zero emissions by 2050.</p>	<p>(Cont'd.)</p>
<p>Concerns about the current scope of the assessment, Tsleil-Waututh Nation requires the spatial scope of the assessment of impacts from marine activities associated with marine shipping extend to the 200 nautical mile limit from the coast to encompass all of Canada’s exclusive economic zone, as well as all of SRKW critical habitat.</p>	<p>The spatial scope of the Impact Assessment will be determined by the IAAC and the BCEAO. Notwithstanding this determination, GCT will work with Indigenous nations to determine potential options to assess Project-related marine shipping effects in their traditional territory, which may extend beyond the spatial scope determined by the IAAC and the BCEAO. Such assessment will explore opportunities to partner with regulators and Indigenous nations on potential mitigation options and wider management initiatives.</p>
<p>The locations of off-site staging and laydown areas have not been identified. Staging and laydown areas can have potential adverse impacts and must be identified in the DPD, and their potential impacts assessed as part of the Impact Assessment.</p>	<p>As stated in Section 3.4.1, the detailed design of staging and laydown areas are unknown at this stage in the Project but will be further explored throughout the Impact Assessment. It is possible that all staging and laydown areas will be located on the terminal, and no additional areas will be required in the uplands.</p>
<p>Include UNDRIP in the list of applicable policies and agreements.</p>	<p>The federal and provincial governments have taken various steps to incorporate UNDRIP principles into the new Impact Assessment. GCT will be following these processes during the Project planning and assessment phase. GCT will apply principles of UNDRIP to the Project assessment by working in partnership with Indigenous nations, including Tsleil-Waututh Nation, throughout the assessment process and by recognizing Indigenous rights, Interests, laws, and Knowledge.</p>
<p>Tsleil-Waututh Nation expects GCT to assess how noise from the Project and lighting installments, including high mast lights, will impact marine birds, Indigenous rights and activities.</p>	<p>The Impact Assessment will characterize sensory disturbances, such as noise and lighting, during construction and operation in the Noise and Vibration and the Light assessment sections. Potential effects of sensory disturbance to wildlife will be considered in the Wildlife Resources assessment. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines for the Project, and will be confirmed through additional engagement with Indigenous nations, stakeholders, the public, federal and provincial regulators. GCT will continue to engage with Tsleil-Waututh Nation on this issue during the Project planning and assessment phase.</p>

**Table 85: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>Concerns about short sea shipping impacts and mitigation measures. Reliance on current regulator programs does not address Project-specific impacts. Mitigation measures need to have clear objectives.</p>	<p>GCT acknowledges Tsleil-Waututh Nation concerns related to potential effects associated with short sea shipping and is evaluating options to assess these activities as part of the Project assessment, since they are incidental activities outside of GCT's care and control. The determination of the scope of the Impact Assessment will be part of the preparation of the Joint Guidelines. GCT continues to engage with Indigenous nations to provide information on how to determine the spatial scope of the Impact Assessment including factors to be considered. The geographic scope is ultimately determined by the IAAC and the BCEAO.</p>
<p>Concern that GCT's responses to Tsleil-Waututh Nation's specific concerns frequently defer to the authority of IAAC and the BC Environmental Assessment Office (BC EAO) to confirm the scope of the DP4 assessment through further engagement on their Joint Guidelines. Tsleil-Waututh Nation expects GCT as the proponent to take the lead in determining the scope of the DP4 assessment, based on Tsleil-Waututh Nation feedback, and present potential resolutions to address our concerns.</p>	<p>GCT acknowledges Tsleil-Waututh Nation's concerns with the scope of the Impact Assessment. GCT affirms that it has drafted Joint Guidelines (TISG/dAIR) but that IAAC and EAO are responsible for determining the scope of the assessment. This scope will be further refined and confirmed through ongoing formal engagement led by the IAAC and EAO. GCT affirms its commitment to ongoing discussion and engagement with Tsleil-Waututh Nation on components beyond the scope of the assessment to identify potential resolutions to Tsleil-Waututh Nation's concerns.</p>
<p>Confirmation that an upstream cumulative effects assessment, which will include an assessment of the cumulative impacts to Indigenous community-based fishing at the mouth of, and on the Fraser River, and to tangible and intangible cultural heritage will be included in the assessment of DP4 impacts.</p>	<p>GCT will assess cumulative impacts to Tsleil-Waututh Nation fishing practices, and tangible and intangible cultural heritage as part of the Impact Assessment. GCT will continue to engage with Tsleil-Waututh Nation to understand and further refine the spatial extent and requirements for an upstream cumulative effects assessment.</p>
<p>Tsleil-Waututh Nation asked GCT to include the following additional baseline studies (to those listed on Table 14, Page 63 of the DPD): a. An Indigenous Health Study, b. Habitat mapping including Sensitive Ecosystem Inventory, c. Visual/Viewpoint Survey.</p>	<p>GCT agrees to include Indigenous health, habitat mapping, and visual/viewpoint studies in the Impact Assessment.</p>
<p>A definition of the categories (i.e., indirect, direct, positive, and negative effects) that will be included in the determination of potential effects and the specific methods that will be used to determine these categories (e.g., what specific methods will GCT use to determine if a potential effect has a positive effect on environmental, social, economic, cultural and health attributes in the surrounding area).</p>	<p>GCT will define effects categories and explain the specific methods for determining these categories as it plans the Impact Assessment, based on federal and provincial guidelines and requirements. GCT will continue to engage with Tsleil-Waututh Nation on this issue during the Project planning and assessment phase.</p>



**Table 85: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
Tsleil-Waututh Nation expects GCT to design mitigation that will address project-specific impacts. GCT can not rely on supporting federal or provincial initiatives or programs to offset/mitigate the potential impacts of DP4.	GCT will design mitigation to address project-specific impacts as part of the Impact Assessment. GCT will continue to engage with Tsleil-Waututh Nation on this issue during the Project planning and assessment phase.

### 8.4.33 T’Sou-ke Nation

This section describes GCT’s engagement with T’Sou-ke Nation during the Early Engagement Phase. Detailed records of engagement activities with T’Sou-ke Nation are provided in Table 86.

GCT has engaged with T’Sou-ke Nation by email, letter, and phone call. GCT has asked T’Sou-ke Nation to specify their preferred methods of engagement. As engagement progresses, GCT is prepared to modify the methods of engagement should that be requested by T’Sou-ke First Nation. In the meantime, GCT will continue to engage T’Sou-ke Nation through various methods. On May 7, 2021, GCT invited T’Sou-ke Nation to attend a workshop to discuss the draft DPD, VC selection, Indigenous Interests, and draft Joint Guidelines.

GCT initiated engagement with T’Sou-ke Nation via an introductory letter on February 25, 2020. On September 29, 2020, GCT provided T’Sou-ke Nation with an update on IAAC and BCEAO approval of the IPD. GCT met with T’Sou-ke Nation between April and June, 2021, to discuss capacity funding, updates to the draft DPD, VCs, the Joint Guidelines and T’Sou-ke Nation’s Indigenous Interests.

T’Sou-ke Nation submitted their notice to engage as a PIN to the BCEAO on February 24, 2021.

**Table 86: Summary of Key Engagement with T’Sou-ke Nation.**

Dates	Subject	Interaction Type	Summary of Engagement
February 25, 2020	Introduction	Letter	<ul style="list-style-type: none"> <li>GCT sent a letter to T’Sou-ke Nation with background about the Project and requested a meeting with T’Sou-ke Nation to discuss their participation and engagement.</li> </ul>
March 10, 2020	Follow-up	Phone Call	<ul style="list-style-type: none"> <li>GCT called T’Sou-ke Nation to follow up on their February 25th letter and requested a meeting to discuss further.</li> </ul>
March 16, 2020	Capacity Funding	Letter	<ul style="list-style-type: none"> <li>T’Sou-ke Nation requested that GCT assist the Nation by providing capacity funding to enable them to participate in early engagement.</li> </ul>
September 10, 2020	Capacity Funding	Email	<ul style="list-style-type: none"> <li>GCT emailed T’Sou-ke Nation about capacity funding and resent documents that were provided by the Federal Government.</li> </ul>
September 29, 2020	IPD	Email	<ul style="list-style-type: none"> <li>GCT provided an update on IAAC and BCEAO approval of IPD.</li> </ul>

**Table 86: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
October 15, 2020	Comment Period	Email	<ul style="list-style-type: none"> <li>GCT informed T'Sou-ke Nation about the comment period for the IPD.</li> </ul>
November 2, 2020	Virtual Open Houses	Email	<ul style="list-style-type: none"> <li>GCT emailed a reminder to T'Sou-ke Nation about IAAC/BCEAO Virtual Open Houses.</li> </ul>
February 10, 2021	Project Schedule	Email	<ul style="list-style-type: none"> <li>GCT provided a detailed Project schedule for T'Sou-ke Nation review of the DPD and Joint Guidelines.</li> </ul>
February 17, 2021	DPD Update	Email	<ul style="list-style-type: none"> <li>GCT emailed T'Sou-ke Nation to confirm receipt of Project updates regarding the DPD.</li> </ul>
February 24, 2021	PIN Notice	Letter	<ul style="list-style-type: none"> <li>T'Sou-ke Nation sent a letter to notify GCT of their intention to participate in the Impact Assessment process for the Project.</li> </ul>
April 7, 2021	Draft DPD Feedback Request	Email	<ul style="list-style-type: none"> <li>GCT sent T'Sou-ke Nation a copy of the draft DPD and requested feedback by May 7, 2021.</li> <li>GCT asked for a meeting to discuss the DPD, studies that T'Sou-ke Nation considers necessary in the review of the Project, and VCs.</li> </ul>
April 15, 2021	Draft DPD	Email	<ul style="list-style-type: none"> <li>GCT sent T'Sou-ke Nation a copy of the draft DPD and requested feedback by May 7, 2021, and a meeting to discuss the DPD, studies that Cowichan Tribes considers necessary in the review of the project, and VCs.</li> </ul>
May 7, 2021	Draft DPD	Email	<ul style="list-style-type: none"> <li>GCT invited T'Sou-ke First Nation to attend a workshop to discuss the following:               <ul style="list-style-type: none"> <li>Draft DPD</li> <li>VC selection</li> <li>Indigenous Interests</li> <li>Joint Guidelines</li> </ul> </li> </ul>
June 10, 2021	Draft DPD	Email	<ul style="list-style-type: none"> <li>GCT emailed T'Sou-ke Nation to enquire about the incorporation of T'Sou-ke Nation issues into DPD.</li> </ul>
June 17, 2021	Draft DPD	Email	<ul style="list-style-type: none"> <li>GCT emailed T'Sou-ke Nation to remind them about the upcoming DPD comment submission deadline.</li> </ul>

During early engagement, T'Sou-ke Nation raised various issues related to the Project. These issues, along with Indigenous Interests raised by T'Sou-ke Nation and the corresponding GCT responses, are summarized in Table 87.

**Table 87: Summary of Indigenous Interests and Issues Raised by T’Sou-ke Nation.**

Indigenous Interests and Issues Raised	GCT Response
<p>Concern regarding impacts to Indigenous and Treaty rights and title: increased Project-related marine shipping may impact T’Sou-ke Nation’s Indigenous and Douglas Treaty rights and title in the already-overburdened Salish Sea. An increase in marine shipping may impact T’Sou-ke Nation’s rights in relation to navigation of the Salish Sea, stewardship of the marine environment (including the spiritually important SRKW, which is already suffering as a result of regional development and fishing/harvesting.</p>	<p>The Impact Assessment is required to assess potential Project effects on marine resources, fish, wildlife, and Indigenous Interests. GCT will continue to engage with T’Sou-ke Nation on marine shipping during the Project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on T’Sou-ke Nations’ Indigenous Interests identified in the draft Joint Guidelines.</p> <p>SRKW are a critical species, and their protection and conservation are important to GCT. Marine mammals including SRKW will be included in the Project assessment, and if the Project proceeds to permitting, the Project will also require a permit under the <i>Species at Risk Act</i>. GCT will engage with Indigenous nations including T’Sou-ke Nation to co-determine how IK and Indigenous views will inform the Impact Assessment. of potential effects where we have permission from T’Sou-ke Nation to do so. The assessment of potential effects may include effects on tourism and the broader ecosystem. GCT looks forward to further engagement with T’Sou-ke Nation on this issue as the Impact Assessment progresses and VCs are defined.</p>
<p>Assessment of full spatial impacts of marine shipping within Canada’s jurisdiction T’Sou-ke Nation has an interest in ensuring the Impact Assessment of Project-related marine shipping is appropriately spatially scoped, to include an assessment of impacts outside the 12 nautical mile limit of Canada’s territorial sea.</p>	<p>The spatial scope of the Impact Assessment will be determined by the IAAC and the BCEAO. Notwithstanding this determination, GCT will work with Indigenous nations to determine potential options to assess Project-related marine shipping effects in their traditional territory, which may extend beyond the spatial scope determined by the IAAC and the BCEAO. Such assessment will explore opportunities to partner with regulators and Indigenous nations on potential mitigation options and wider management initiatives.</p>
<p>Assessment of full spatial impacts of marine shipping within Canada’s jurisdiction: it appears that Project-related marine shipping will have impacts in Canada’s Exclusive Economic Zone, which ships will be transiting while importing/exporting from the Asia-Pacific region. Concern that the IPD purports to limit the scope of Project-related marine shipping to Buoy J at the western entrance to Juan de Fuca Strait from the Pacific Ocean, which corresponds with the limit of Canada’s territorial sea.</p>	<p>The spatial scope of the Impact Assessment will be determined by the IAAC and the BCEAO. Notwithstanding this determination, GCT will work with Indigenous nations to determine potential options to assess Project-related marine shipping effects in their traditional territory, which may extend beyond the spatial scope determined by the IAAC and the BCEAO. Such assessment will explore opportunities to partner with regulators and Indigenous nations on potential mitigation options and wider management initiatives.</p>

**Table 87: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>Assessment of full spatial impacts of marine shipping within Canada’s jurisdiction.            Concern that other Impact Assessment authorities have limited the assessment of shipping impacts without full consideration of T’Sou-ke Nations’ interests in that area.            Concern that this Impact Assessment should not take the same path.</p>	<p>The determination of the scope of the Impact Assessment will be part of the preparation of the Joint Guidelines. GCT continues to engage with Indigenous nations to provide information on how to determine the spatial scope of the Impact Assessment including factors to be considered. The geographic scope is ultimately determined by the IAAC and the BCEAO.</p>
<p>Effective mitigation measures, especially in relation to acoustic and physical impacts to SRKWs and other marine life, are extremely difficult to develop in light of the overburdened state of the Salish Sea.</p>	<p>The Impact Assessment will characterize sensory disturbances during construction and operation in the noise and vibration and the light assessment sections. Potential effects of sensory disturbance to wildlife will be considered in the wildlife resources assessment. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines for the Project and will be confirmed through additional engagement with Indigenous nations, stakeholders, the public, federal and provincial regulators.</p>

#### 8.4.34 Ts’uubaa-asatx First Nation

This section describes GCT’s engagement with Ts’uubaa-asatx (Lake Cowichan) First Nation during the Early Engagement Phase. Detailed records of engagement activities, key interests and issues raised by Ts’uubaa-asatx First Nation are provided in Table 88 and Table 89.

GCT has engaged with Ts’uubaa-asatx First Nation by email, letter, and phone calls. GCT has asked Ts’uubaa-asatx First Nation to specify their preferred methods of engagement. As engagement progresses, GCT is prepared to modify the methods of engagement should that be requested by Ts’uubaa-asatx Nation. In the meantime, GCT will continue to engage Ts’uubaa-asatx First Nation through various methods.

On February 25, 2020, GCT initiated engagement with Ts’uubaa-asatx First Nation by providing a letter outlining the Project. GCT met with Ts’uubaa-asatx First Nation between April and June, 2021, to discuss capacity funding, updates to the draft DPD, VCs, the Joint Guidelines and Ts’uubaa-asatx First Nation’s Indigenous Interests.

Ts’uubaa-asatx First Nation has not submitted a notice to engage as a PIN to the BCEAO.

**Table 88: Summary of Key Engagement with Ts’uubaa-asatx (Lake Cowichan) First Nation.**

Dates	Subject	Interaction Type	Summary of Engagement
February 25, 2020	Introduction	Letter	<ul style="list-style-type: none"> <li>GCT informed Ts’uubaa-asatx First Nation about the Project and requested a meeting with Ts’uubaa-asatx First Nation to discuss their participation and engagement.</li> </ul>

**Table 88: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
March 19, 2020	Introduction	Email	<ul style="list-style-type: none"> <li>GCT provided Ts'uubaa-asatx First Nation with information on the Project and requested a call to discuss further.</li> </ul>
July 10, 2020	Follow-Up	Email	<ul style="list-style-type: none"> <li>GCT emailed Ts'uubaa-asatx First Nation to provide Project updates and information on discussion opportunities.</li> </ul>
September 10, 2020	Introduction	Phone Call	<ul style="list-style-type: none"> <li>GCT called Ts'uubaa-asatx First Nation to provide them with:               <ul style="list-style-type: none"> <li>Updated Project presentation</li> <li>Letter of Introduction</li> <li>IAAC capacity funding</li> <li>Underwater vessel noise news release from Transport Canada.</li> </ul> </li> </ul>
September 11, 2020	Introduction	Email	<ul style="list-style-type: none"> <li>Ts'uubaa-asatx First Nation requested more information on the Project.</li> <li>GCT provided Ts'uubaa-asatx First Nation with the introductory letter and presentation, as well as information on underground vessel noise.</li> </ul>
September 11, 2020	Capacity Funding	Email	<ul style="list-style-type: none"> <li>GCT provided information to Ts'uubaa-asatx First Nation on IAAC's capacity funding opportunities.</li> </ul>
September 29, 2020	IPD	Email	<ul style="list-style-type: none"> <li>GCT provided an update on Regulator Approval of IPD.</li> </ul>
October 15, 2020	Comment Period	Email	<ul style="list-style-type: none"> <li>GCT informed Ts'uubaa-asatx First Nation about the comment period for the IPD.</li> </ul>
November 2, 2020	Virtual Open Houses	Email	<ul style="list-style-type: none"> <li>GCT informed Ts'uubaa-asatx First Nation about the IAAC/BCEAO Virtual Open Houses.</li> </ul>
November 12, 2020	Participation	Conference Call	<ul style="list-style-type: none"> <li>GCT met with Ts'uubaa-asatx First Nation to discuss their participation and engagement in the Project.</li> <li>Ts'uubaa-asatx First Nation is interested in completing work on their TLU study. Ts'uubaa-asatx First Nation provided a cost estimate for the TLU.</li> </ul>
December 1, 2020	Capacity Funding	Email	<ul style="list-style-type: none"> <li>GCT sent a draft Capacity Funding Agreement to Ts'uubaa-asatx First Nation.</li> </ul>
December 17, 2020	Capacity Funding	Email	<ul style="list-style-type: none"> <li>GCT followed up with Ts'uubaa-asatx Nation about the Capacity Funding Agreement.</li> </ul>

**Table 88: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
February 10, 2021	Project Schedule	Email	<ul style="list-style-type: none"> <li>GCT provided a detailed Project schedule for Ts'uubaa-asatx First Nation review of the DPD and Joint Guidelines.</li> </ul>
February 24, 2021	DPD Update	Email	<ul style="list-style-type: none"> <li>GCT provided Ts'uubaa-asatx First Nation with an update on the DPD and anticipated schedule.</li> </ul>
April 7, 2021	Draft DPD Feedback Request	Email	<ul style="list-style-type: none"> <li>GCT sent Ts'uubaa-asatx First Nation a copy of the draft DPD and requested feedback by May 7, 2021.</li> <li>GCT asked for a meeting to discuss the DPD, studies that Ts'uubaa-asatx First Nation considers necessary in the review of the Project, and VCs.</li> </ul>
April 15, 2021	Draft DPD	Email	<ul style="list-style-type: none"> <li>GCT requested Ts'uubaa-asatx Nation to provide feedback on the draft DPD and requested a meeting to discuss their recommendations for study reviews and VCs.</li> </ul>
April 28, 2021	Meeting	Email	<ul style="list-style-type: none"> <li>GCT invited Ts'uubaa-asatx Nation to attend a meeting with IAAC and BCEAO.</li> </ul>
April 28, 2021	Capacity Funding	Email	<ul style="list-style-type: none"> <li>GCT followed up with Ts'uubaa-asatx Nation on the Capacity Funding Agreement.</li> </ul>
May 12, 2021	Advocacy Policy and Issues Raised	Meeting	<ul style="list-style-type: none"> <li>GCT met with Ts'uubaa-asatx Nation to discuss the Ts'uubaa-asatx Nation Policy and the Checklist for multiple Archaeological assessments and research permit.</li> <li>Ts'uubaa-asatx Nation raised issues regarding the following:               <ul style="list-style-type: none"> <li>Habitat protection</li> <li>Archaeological site protection</li> <li>Acoustic disturbance</li> <li>Cultural incorporation into the Project</li> <li>Inadequate capacity funding</li> </ul> </li> </ul>
May 18, 2021	Capacity Funding	Email	<ul style="list-style-type: none"> <li>GCT confirmed that capacity funding was available for the duration of the formal Impact Assessment.</li> <li>GCT requested confirmation that Ts'uubaa-asatx Nation will provide DPD comments.</li> <li>GCT provided a link to the draft DPD.</li> </ul>

**Table 88: (Cont'd.)**

Dates	Subject	Interaction Type	Summary of Engagement
June 9, 2021	VCs and Indigenous Interests Workshop	Meeting	<ul style="list-style-type: none"> <li>• GCT met with Ts'uubaa-asatx Nation to discuss:               <ul style="list-style-type: none"> <li>○ Project update</li> <li>○ Ts'uubaa-asatx Nation Advocacy Policy</li> <li>○ Progress and refinement of VC selection</li> <li>○ Preliminary understanding of Ts'uubaa-asatx Nation's Indigenous Interests potential project effects</li> </ul> </li> </ul>
June 21, 2021	Capacity Funding	Email	<ul style="list-style-type: none"> <li>• GCT emailed Ts'uubaa-asatx First Nation providing the finalized Capacity Funding Agreement. GCT requested a signature and stated that GCT would return an executed copy.</li> </ul>

During early engagement, Ts'uubaa-asatx First Nation raised various issues related to the Project. These issues, along with Indigenous Interests raised by Ts'uubaa-asatx First Nation and the corresponding GCT responses, are summarized in Table 89.

**Table 89: Summary of Indigenous Interests and Issues Raised by Ts'uubaa-asatx First Nation.**

Indigenous Interests and Issues Raised	GCT Response
Concerns about Project effects on biofilm.	The Impact Assessment is required to assess potential Project environmental impacts on the environment. Biofilm will be considered in the assessment of potential Project effects including as a pathway to potential effects to shore birds. GCT plans to complete field surveys focused on biofilm in 2021/2022. GCT will continue to engage with Ts'uubaa-asatx Nation on this issue during the Project planning and assessment phase.
Concerns about potential effects on fish and fish habitat.	The Impact Assessment is required to assess potential Project effects on marine resources fish and fish habitat, wildlife and Indigenous Interests. GCT will continue to engage with Ts'uubaa-asatx Nation on this issue during the project planning and assessment phase, including on the preliminary list of potential effects on Indigenous Interests identified in the DPD, Section 7.8 and list of potential effects on Ts'uubaa-asatx Nations' Indigenous Interests identified in the draft Joint Guidelines.
Concern about spill response and prevention strategies.	The Impact Assessment is required to assess the potential for malfunctions and accidents including spill response and the potential Project environmental effects including changes to marine use.

**Table 89: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
(Cont'd.)	GCT is planning a risk-based approach for the assessment of malfunctions and accidents that could affect VCs and Indigenous Interests identified for the Project. This could include assessment of the consequence of incidents and consider potential environmental, economic, social, cultural and health effects and effects to Indigenous Interests. GCT will continue to engage with Ts'uubaa-asatx Nation on this issue during the Project planning and assessment phase.
Concern about storm water management on the causeway. Request that GCT address storm water management considerations and look at habitat offsetting in the causeway area.	The Project will require an Authorization under the Fisheries Act, which will require the development of a Habitat Offsetting Plan. GCT will continue to engage with Ts'uubaa-asatx First Nation on this issue during the project planning and assessment phase.
Concern about substantial shore-line effects and spills and accidents on marine habitats and wildlife and the need for restoration and enhancement for future Ts'uubaa-asatx Nation use.	The Impact Assessment is required to assess the potential for malfunctions and accidents, the potential environmental effects including effects to marine resources, fish, fish habitat, wildlife, aquatic wildlife, and Indigenous Interests including physical and cultural heritage. GCT will continue to engage with Ts'uubaa-asatx Nation on this issue during Project planning and assessment phase, including on how the preliminary list of potential effects on Indigenous Interests identified in the Joint Guidelines can incorporate effects on areas of high archaeological potential and use of cultural places.
Concern about the need for high-quality habitat protection, restoration, and enhancement in areas with diking or in the vicinity of dikes. Ts'uubaa-asatx Nation requests GCT institute Best Management Practices if habitat off-set or banking initiatives are being done with diking.	<p>The Impact Assessment is required to assess potential Project effects on the environment. GCT will continue to engage with Ts'uubaa-asatx Nation on this issue during Project planning and assessment phase, including on how the preliminary list of potential effects on Indigenous Interests identified in the Joint Guidelines.</p> <p>GCT appreciates Ts'uubaa-asatx Nation providing reference to the Best Management Practices for diking. GCT will continue to engage with Ts'uubaa-asatx Nation on the consideration of diking Best Management Practices.</p>
Concern about side-channel (re-)creation and the need for sufficient shading or shaded areas along the Fraser River to reduce heat stressors on aquatic life forms using the river.	<p>The Impact Assessment is required to assess potential Project effects on the environment. GCT will continue to engage with Ts'uubaa-asatx Nation on this issue during Project planning and assessment phase, including on how the preliminary list of potential effects on Indigenous Interests identified in the Joint Guidelines.</p> <p>GCT appreciates Ts'uubaa-asatx Nation providing reference to knowledge regarding the importance of side-channel (re-)creation and shading along the Fraser River, on which GCT will continue to engage with Ts'uubaa-asatx Nation.</p>



**Table 89: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
<p>Concerns about areas where off-sets or banking might occur and the effects on archaeological sites. Ts'uubaa-asatx Nation emphasized the critical importance of archaeological sites, with the need for no further loss of archaeological sites in these areas.</p>	<p>The Impact Assessment is required to assess potential Project effects on physical and cultural heritage. GCT will continue to engage with Ts'uubaa-asatx Nation on this issue during Project planning and assessment phase, including on how the preliminary list of potential effects on Indigenous Interests identified in the Joint Guidelines can incorporate effects on areas of high archaeological potential and use of cultural places.</p>
<p>Concerns about noise and the institution of noise reduction measures in design and noise abatement to reduce stressors on wildlife, marine mammals, and humans, including sea life close to the terminal such as herring roe on kelp.</p>	<p>The Impact Assessment is required to assess potential Project effects on the environment and human health and well-being. GCT is required to work under Transport Canada's Underwater Noise Reduction Initiative. GCT will continue to engage with Ts'uubaa-asatx Nation on this issue during Project planning and assessment phase.</p>
<p>Concerns about the use of pervious surfaces in design where practical, or the softening of the interface between the impervious surface and the associated and/or adjacent water ways. This includes the use of storm water drainage on impervious surfaces which enable toxic materials to enter the waters around the facility.</p>	<p>The Impact Assessment is required to assess potential Project effects on the environment. GCT will continue to engage with Ts'uubaa-asatx Nation on this issue during Project planning and assessment phase. GCT appreciates Ts'uubaa-asatx Nation providing reference to their perspectives on Project design and environmental protection. GCT will review and consider as the Project design advances.</p>
<p>Interest in the incorporation of design, or creation of areas for cultural recognition and celebration of the Aboriginal history and use of the area is seen. Ts'uubaa-asatx Nation suggests erecting Salish Welcoming Poles at the entrance to the causeway, including Salish artwork on the cranes, or using Salish names on the tugs that operate at Deltaport.</p>	<p>GCT appreciates Ts'uubaa-asatx Nation providing reference to their perspectives on Project design including cultural recognition and Indigenous history. GCT will work with Ts'uubaa-asatx Nation in considering such opportunities as the Project design advances.</p>
<p>Concern about the potential for historical issues, such as storm water drainage, due to original impacts from ageing infrastructure.</p>	<p>GCT will continue to engage with Ts'uubaa-asatx Nation on these historical issues to understand Project interactions during the Project planning and assessment phase.</p>
<p>Interest in Indigenous involvement in monitoring programs and increased opportunities for Ts'uubaa-asatx Nation to pursue their economic interests associated with the Project area. This includes Ts'uubaa-asatx Nation's exercise of their right to trade within the Project area.</p>	<p>The Impact Assessment is required to assess potential Project effects on Indigenous Interests. GCT will engage with Ts'uubaa-asatx Nation about Indigenous involvement, including Ts'uubaa-asatx Nation involvement, in future environmental and heritage monitoring plans and opportunities for Ts'uubaa-asatx Nation to pursue their economic interests during the Project planning and assessment phase.</p>

**Table 89: (Cont'd.)**

Indigenous Interests and Issues Raised	GCT Response
Interest in putting in place early training programs that would allow people to have the skills and experience for when the jobs become available under the project.	GCT will engage with Ts'uubaa-asatx Nation about possible training and job opportunities and other potential economic benefits during the Project planning and assessment phase.
Ts'uubaa-asatx Nation is looking to re-establish a place near the Project area for Lake Cowichan First Nation members working on the Project to reside.	GCT will continue to engage with Ts'uubaa-asatx Nation to better understand this issue and its applicability to the Project.
Ts'uubaa-asatx Nation recommends stringent practices during construction or deconstruction to reduce the opportunity for spills and accidents and increase processes, readiness and practices for spill response and recovery to diminish harmful impacts and speedy recovery.	The Impact Assessment is required to assess the potential for malfunctions and accidents, including spill response and readiness. GCT is planning a risk-based approach for the assessment of malfunctions and accidents that could affect VCs and Indigenous Interests identified for the Project. This could include assessment of the consequence of incidents and consider potential environmental, economic, social, cultural and health effects and effects to Indigenous Interests.
Concerns about the increased marine traffic in the area due to the Project and its impacts on fishing and harvesting.	The Impact Assessment is required to assess the potential Project effects on marine resources, fish, wildlife and Indigenous Interests. GCT will continue to engage with Ts'uubaa-asatx First Nation in an effort to avoid and mitigate adverse effects on the environment and traditional use activities.

## 8.5 Summary of Agreements with Indigenous Nations

In 2010, prior to the initiation of the Project, GCT signed an MOU with Tsawwassen First Nation. The MOU outlines the Principles of Collaboration to work together with transparency, honesty, and integrity, including participation in joint economic development opportunities, collaboration to develop new strategies to enhance local and regional economies, and adoption of a respectful communication protocol among other principles.

## 8.6 Preliminary Consideration of Indigenous Interests in Project Design

This section identifies how GCT has made preliminary changes to the Project design to mitigate or avoid the Project's potential effects on Indigenous Interests. GCT has developed its understanding of Indigenous Interests and mitigations from the Indigenous nations' input on the JSOIE, Indigenous nations' notices to engage as PINs, and ongoing engagement. GCT will continue to engage with Indigenous nations to develop mitigation measures and management plans that address potential effects on Indigenous Interests.

GCT has committed to the following Project design changes to mitigate the effects on Indigenous Interests:

- The incorporation of a fishing boat marina, identified as a project component in Section 3.3 is an example of working with Indigenous nations to identify ways to accommodate fishing and other activities, where access to deeper water is not tide-bound, which is currently a limiting factor.

- GCT acknowledges that the Project is currently in the early phases of planning and that engagement with Indigenous nations about Project interactions with their Indigenous Interests is still ongoing. GCT will continue to work with Indigenous nations to better understand how the Project may potentially affect their Indigenous Interests and discuss Project design and other measures which may eliminate or mitigate potential effects of the Project.

## 8.7 Summary of Planned Engagement Activities and Opportunities to Work Together

The following section of the DPD provides a summary of planned engagement activities with Indigenous nations and opportunities for GCT to engage with Indigenous nations, IAAC and BCEAO.

GCT will continue engagement with identified Indigenous nations throughout the Project to keep them informed about any updates to the Project or the Impact Assessment process. Based on engagement with the Indigenous nations outlined in Section 8.4, GCT expects to continue carrying out the following engagement activities. These efforts will be coordinated with the regulatory agencies to ensure Indigenous nations are receiving the most current information about the Impact Assessment process and the opportunities to engage:

- Provide the capacity required to enable Indigenous nations to fully participate in the Impact Assessment process;
- Provide Project updates and solicit further and ongoing feedback on the Project design and solicit feedback from Indigenous nations on the Impact Assessment process, including Indigenous Interests, VC selection, Impact Assessment methodology, mitigations, monitoring, and Project residual and cumulative effects;
- Seek opportunities for participation of Indigenous nations throughout the Impact Assessment;
- Seek input on processes for issues resolution;
- Develop additional engagement tools as requested or directed by Indigenous nations;
- Continue engagement with Indigenous nations during and beyond the regulatory agencies' review of the Joint Guidelines; and
- Develop Framework Agreements and MOUs with Indigenous nations to support longer-term relationships.

GCT recognizes Tsawwassen First Nation's request to provide opportunities for them to conduct a Tsawwassen First Nation-led assessment under the IAA. GCT will explore this opportunity alongside Tsawwassen First Nation, IAAC, and BCEAO in upcoming Project phases.

IK is critical to the development of Impact Assessment and the success of the Project overall. GCT will engage with Indigenous nations to develop Project related documents and processes that rely on both IK and western science. In cases where Indigenous nations have not yet completed studies for the Project area, GCT will support the development of nation-specific IK studies. GCT will engage with Indigenous nations to co-develop IK Study terms of reference to provide direction on how IK and Indigenous views will inform the Impact Assessment and the Project. GCT is continuing to engage Indigenous nations, the BCEAO and IAAC to identify opportunities to work together on the assessment of Indigenous Interests. In addition to the opportunities above, specific to the Impact Assessment, GCT will continue to engage with Indigenous nations to identify potential business opportunities.

## 9 ENGAGEMENT AND CONSULTATION WITH GOVERNMENTS, THE PUBLIC AND OTHER PARTIES

GCT has continued to conduct engagement with local stakeholders, municipalities and the public in accordance with Federal and Provincial requirements since the submission of the IPD in September 2020.

As stated in Section 1.1, the agencies published the JSOIE report to GCT in December 2020 which was based on feedback received from Indigenous nations, federal authorities, local stakeholders and the public during the public comment period on the IPD. GCT's proposed approach to addressing each of the issues summarized in the JSOIE report is presented in Appendix C. Key issues raised in the Summary of Issues table within the JSOIE report include:

- Potential effects of malfunctions and accidents including human health effects and risk analysis;
- Potential effects of noise (terrestrial) and air quality including impacts to sensitive ecosystem receptors;
- Clarity on details on the alternatives to the Project;
- Clarity on the Project activities resulting in GHG emissions and the Project's contribution to Canada's environmental commitments;
- Consideration of cumulative effects and gender-based analysis;
- Potential effects of the Project on socio-economic conditions, economic conditions, fish and fish habitat, geological hazards, human health and well-being, marine use, marine mammals, wildlife, migratory birds, wetland transboundary effects and visual environment;
- Consideration about marine shipping, road and rail and short sea shipping;
- Potential effects of the Project on Indigenous peoples' rights and title and impacts from malfunctions and accidents that may interact with cultural values; and
- Clarity on the inclusion of UNDRIP in the Project.

### 9.1 Public and Stakeholder Engagement

GCT understands that the residents and stakeholders in the GCT community expect all Project communications to be transparent, timely and responsive to community hopes and concerns. GCT has been operating in Delta for more than 20 years and the company is focused on continuing to be a responsible neighbour by being open and engaged when responding to community requests and concerns. Regarding public and stakeholder engagement, GCT will:

- Ensure that opportunities to engage in the Project are made apparent to the public via local media, publicly accessible websites, and/or other available and appropriate means;
- Conduct public engagement in a way that removes as many barriers to participation as possible and captures a diverse range of feedback;
- Tailor engagement to the needs of the community by asking the right questions of the right people to gain meaningful feedback;
- Help the public better understand how to provide useful feedback on the Project; and
- Consider feedback provided during its Project design, plans and/or studies and communicate results of these considerations.

To ensure that engagement is focused and relevant, GCT has created a list of the groups, populations, or individuals that will be engaged with as part of public and stakeholder engagement. This includes all those who could be directly or indirectly affected by the Project such as residents from nearby communities, businesses and business groups, non-government organizations, academic institutions, community groups, recreation groups, tenure holders and other public stakeholders. The list of groups that were identified or engaged in the preparation of the IPD and DPD is provided in Table 90. The status description “Identified” indicates that the organization has an interest in the proposed Project and “Engaged” indicates that the Proponent has contacted the organization for feedback or feedback has been received.

**Table 90: List of Public and Stakeholder Groups Identified for Engagement.**

Organization	Rationale	Status
Environmental, Community and Non-Governmental Organizations		
Against Port Expansion	Community group that previously expressed interest in developments at Roberts Bank. Members sit on various environmental committees in the region.	Engaged
Area I Crab Fisherman Association	Stakeholder group who previously expressed interest in developments at Roberts Bank.	Identified
BC Great Blue Heron Society	Stakeholder group who previously expressed interest in developments at Roberts Bank.	Engaged
BC Nature: Delta Naturalists Society	Stakeholder group who previously expressed interest in developments at Roberts Bank.	Engaged
Bird Studies Canada	Stakeholder group who previously expressed interest in developments at Roberts Bank.	Engaged
Boundary Bay Conservation Committee	Community group that previously expressed interest in developments at Roberts Bank.	Engaged
Burns Bog Conservation Society	Community group that is interested in the preservation of Burns Bog.	Engaged
David Suzuki Foundation	Stakeholder group that previously expressed interest in developments at Roberts Bank.	Engaged
Delta Farmers’ Institute	Stakeholder group that previously expressed interest in developments at Roberts Bank.	Engaged
Ecojustice	Local community group that previously expressed interest in developments at Roberts Bank.	Engaged
Fraser River Discovery Centre	Stakeholder group that connects communities up- and down-river and provides a place to discuss, debate, and showcase the living, working Fraser River.	Engaged
Fraser Voices	Local community group that previously expressed interest in developments at Roberts Bank.	Engaged
First Nations Fisheries Council	The First Nations Fisheries Council works with and on behalf of BC First Nations to protect and reconcile First Nations rights and title as they relate to fisheries and the health and protection of aquatic resources.	Engaged

**Table 90: (Cont'd.)**

Organization	Rationale	Status
Environmental, Community and Non-Governmental Organizations (Cont'd.)		
Georgia Strait Alliance	Environmental group with an interest in the protection of the Georgia Strait.	Engaged
Greater Vancouver Urban Freight Council	Stakeholder group formed to advance the implementation of TransLink's Regional Goods Movement Strategy	Identified
Hwlitsum First Nation	GCT understands that the Government of Canada and the Government of BC do not currently recognize Hwlitsum as a band under the <i>Indian Act</i> . GCT will continue engagement efforts until such time as GCT is able to hear their perspective on the Project.	Identified
Nature Canada	Nature conservation charity	Engaged
Port Community Liaison Committee	Local community group established by VFPA to discuss port expansion projects.	Engaged
Raincoast Conservation Foundation	Conservation group that previously expressed interest in developments at Roberts Bank.	Identified
Wilderness Committee	Stakeholder group that previously expressed interest in developments at Roberts Bank.	Identified
Business, Labour and Trade Organizations		
Business Council of BC	Stakeholder group with an interest in economic development.	Engaged
Canadian Chamber of Commerce	Stakeholder group with an interest in west coast container capacity.	Engaged
Delta Chamber of Commerce	Stakeholder group with an interest in economic development.	Engaged
Greater Langley Chamber of Commerce	Stakeholder group with an interest in economic development.	Identified
Greater Vancouver Board of Trade	Stakeholder group with an interest in economic development.	Engaged
Greater Vancouver Gateway Council	Stakeholder group with an interest in west coast container capacity.	Identified
Independent Contractors and Businesses Association	Stakeholder group with an interest in economic development.	Engaged
International Longshore & Warehouse Union	Labour group currently working at GCT Deltaport.	Engaged
Retail Council of Canada	Stakeholder group with an interest in economic development.	Identified
Richmond Chamber of Commerce	Stakeholder group with an interest in economic development.	Identified

**Table 90: (Cont'd.)**

Organization	Rationale	Status
Business, Labour and Trade Organizations (Cont'd.)		
Surrey Board of Trade	Stakeholder group with an interest in economic development	Engaged
Railroad and Shipping Stakeholders		
BC Rail	Stakeholder group with an interest in west coast container capacity.	Engaged
BC Trucking Association	Stakeholder group with an interest in the movement of goods to and from Roberts Bank.	Engaged
Canadian Pacific Railway Ltd.	Stakeholder group with an interest in west coast container capacity.	Engaged
Chamber of Shipping	Stakeholder group with an interest in west coast container capacity.	Engaged
CN Rail	Stakeholder group with an interest in west coast container capacity.	Engaged
Shipping Federation of Canada	Stakeholder group with an interest in west coast container capacity.	Engaged
United Truckers Association	Stakeholder group with an interest in the movement of goods to and from Roberts Bank.	Identified
Western Transportation Advisory Council	Stakeholder group with an interest in west coast container capacity.	Engaged

### 9.1.1 Summary of Early Public and Stakeholder Engagement

To date, engagement activities have been well received by the community and GCT has held regular informal and formal meetings with community groups and stakeholders through the development of the IPD and DPD. GCT also participated in two public engagement webinars hosted by the BCEAO and IAAC on the IPD on November 5, 2020, and November 10, 2020. These webinars were advertised widely in local newspapers, details posted online, and mailed directly to stakeholders and municipalities. Additional early engagement activities with the public and stakeholders include:

- Updates to the Project website: <https://globalterminalscanada.com/projectupdates/>;
- Annual newsletter to all Delta and Ladner residents regarding GCT's yearly activities, including an update on the Project; Presentations to the Port Community Liaison Committee;
- Presentations to Delta Chamber of Commerce;
- Presentation to Chamber of Shipping;
- Presentation to Surrey Board of Trade;
- Presentation to the public hosted by Fraser River Discovery Centre;
- Presentation to Western Transportation Advisory Council;
- Presentation to Technical Advisory Committee;

- Presentation to Canadian Chamber of Commerce;
- Presentations to Greater Vancouver Board of Trade Transportation and Infrastructure Committee;
- Presentations to Business Council of BC;
- Presentations to supply chain partners;
- Social media and traditional print advertising;
- Individual and group meetings with local and provincial environmental groups;
- Voice message to all Delta residents regarding the Project;
- Review of feedback from groups in relation to previous port expansion projects; and
- Email to key stakeholder groups to solicit feedback on frequency and method of engagement.

### 9.1.2 Key Interest or Issues Identified

Table 91 further outlines the public’s expressed interest in the proposed Project to date, such as concerns, potential benefits, Project design improvements, and how the public wishes to be engaged during the early engagement phase and the environmental assessment process as a whole.

As mentioned above, GCT has been engaging with various organizations in relation to previous port expansion projects and has carefully considered their previous comments. Overall topic areas of engagement and feedback included the following:

- Human Health: light, noise, air quality, truck traffic, access to fisheries, and transportation infrastructure;
- Environment: biofilm, eelgrass, marine conservation and conservation areas, migratory birds, shorebirds, barn owls, appropriate habitat offsetting, marine invertebrates, Pacific Salmon, SRKW, marine traffic, and underwater noise; and
- Economy: container capacity requirements, Project funding, and mode of operations.

**Table 91: Key Issues Raised by Public and Stakeholders.**

Organization	Issues Raised
Various environmental groups	Biofilm and migratory shorebirds
Against Port Expansion	Light pollution and its effect on birds, including western sandpiper.
Business Council of British Columbia	Supportive of increased capacity on Canada’s west coast.
Bird Studies Canada	Concerns about bird habitats that are negatively affected by the expansion of port infrastructure. Interested in identifying and improving those options that maintain the health and function of the estuary. On June 9, Bird Studies Canada provided written feedback on the Project outlining areas where they have concerns. These include cumulative impacts, seabirds and seaducks along the shipping route, waterfowl and herons, shorebirds, raptors, land birds and the impact of the project on birdwatching in the area. Bird Studies Canada also suggested determining baseline populations and distributions of birds using the estuary.



**Table 91: (Cont'd.)**

Organization	Issues Raised
Boundary Bay Conservation Committee	Location of existing power lines on the causeway and effect on migratory bird populations.
Chamber of Shipping	Questions regarding timeline and how long will the Impact Assessment and permitting process will take.
Delta Chamber of Commerce	General concerns regarding container capacity and procedure for approval. The Chamber also requested specific information about development on the east side of the causeway.
Delta community groups	General concerns regarding the Fraser River and Estuary, migratory bird populations, salmon, herring, crabs, eulachon and other wildlife of the Fraser River and estuary and the waters beyond, including the three resident killer whale pods, already listed as endangered.
Greater Vancouver Board of Trade	Supportive of increased capacity on Canada’s west coast.
International Longshore & Warehouse Union	Level of automation and potential job loss.
Port Community Liaison Committee	Specific questions regarding the amount of capacity and cost of the Project. Concerns regarding the Project’s effects on biofilm and migratory bird populations.
Railways	Supportive of the Project and would be interested in further engaging in the process in relation to railway infrastructure and configuration.

### 9.1.3 Planned Public and Stakeholder Engagement

GCT is committed to ongoing engagement and collaboration with the public and stakeholders to find collaborative solutions to various issues, including those described in section 9.1.2 above. The following public and stakeholder engagement activities are proposed (where appropriate, taking Covid restrictions into account) to keep the lines of communication open, to share information and address concerns throughout the Impact Assessment process:

- Regular updates the Project website, including highlighting GCT and regulator led engagement opportunities;
- Advertise public engagement opportunities with the local media and social media channels;
- Virtual engagement sessions with stakeholders;
- Site tours of the Project site;
- Face-to-face meetings;
- Telephone town halls;
- Open houses and telephone town halls;
- Traditional means of notification such as print media, direct mail, website and emails;
- Innovative online community engagement tools;
- Newsletters;

- Informational videos;
- Social media;
- E-newsletters;
- Surveys (online, phone, mail, in-person); and
- Fact sheets, FAQs.

As the public is familiar with GCT and its previous projects in the region, continuing to build on the positive reputation that has been built with the community is important to GCT. As much of our workforce lives south of the Fraser River, we feel it is critical to also consult the labour union ILWU about the Project design and mode of operation.

GCT has also considered potentially affected populations that may be underrepresented by traditional engagement methods, such as public open houses or town halls. GCT is proposing the following measures to reach under-represented communities:

- Provide a variety of in-person and virtual engagement methods and locations;
- Offer multiple times of day for in-person and virtual engagement;
- All public locations will be as close as possible to public transit for increased accessibility;
- Any news releases will be distributed to relevant in-language media;
- Project materials will be in digital and print form; and
- All public venues chosen will be wheelchair accessible.

GCT has sought recommendations from municipalities and elected officials on how best to engage their community on the Project, such as locations for open houses, or suggested community events to build awareness. In addition to the demographic information publicly available, GCT has also sought feedback from local government on reaching underrepresented populations to ensure engagement activities are inclusive and representative.

Further details on GCT's planned public and stakeholder engagement are provided in the GCT DP4 Early Engagement Plan.

## 9.2 Government Engagement

As a member of the Delta community, GCT is committed to ongoing consultation and communications with the City of Delta, its neighbouring municipalities, the provincial government of BC, and the Government of Canada, among others. GCT has a long history of successful operations in the community and will continue to build on our previous engagement to ensure the Project meets the objectives of our neighbouring communities and government agencies. By incorporating feedback from these agencies during our 23 years in operations at Roberts Bank, we have established strong lines of communication and understand the needs of these municipalities, provincial and federal government agencies.

An initial list of federal, provincial and municipal agencies that GCT has identified or engaged with in the preparation of the IPD and DPD is provided in Table 92 and includes the status of the engagement. Specific concerns or feedback, if any, are described in Table 93.

**Table 92: List of Municipal, Provincial and Federal Agencies Identified for Engagement.**

Agency	Status
<b>Municipal and Regional Government</b>	
City of Delta	Engaged
City of Langley	Engaged
Township of Langley	Engaged
City of Richmond	Engaged
City of Surrey	Engaged
City of Vancouver	Engaged
Delta Fire & Emergency Services	Identified
Delta Police Department	Engaged
Metro Vancouver	Engaged
<b>Provincial Government</b>	
Member of Legislative Assembly Delta North	Engaged
Member of Legislative Assembly Delta South	Engaged
Ministry of Environment & Climate Change Strategy	Engaged
Ministry of Transportation and Infrastructure	Engaged
Ministry of Agriculture, Food and Fisheries	Engaged
Ministry of Forestry Lands and Natural Resource Operations and Rural Development (FLNRORD)	Engaged
Office of the Premier	Engaged
<b>Provincial Government Agencies/Health Authorities</b>	
BC Environmental Assessment Office	Engaged
Fraser Health Authority	Engaged
<b>Federal Government</b>	
BC Caucus of the Conservative Party of Canada	Engaged
BC Caucus of the Liberal Party of Canada	Engaged
Delta Member of Parliament	Engaged
Minister of Environment and Climate Change	Engaged
Minister of Fisheries and Ocean	Engaged
Minister of Transport	Engaged
Office of the Prime Minister	Engaged
Privy Council Office	Engaged
<b>Federal Government Agencies</b>	
Canadian Transportation Agency	Engaged
Environment and Climate Change Canada	Engaged
Health Canada	Identified
Impact Assessment Agency of Canada	Engaged
Parks Canada	Identified
Transport Canada	Engaged
Vancouver Fraser Port Authority	Identified

### 9.2.1 Summary of Early Government Engagement

Since 2015, GCT has been proactively meeting with municipalities and provincial and federal government agencies specifically in relation to the Project, as identified in Table 92.

Given our proximity to the City of Delta and surrounding municipalities, GCT has conducted multiple in-person meetings and presented to Mayor and Council as a whole to provide updates on the Project over the years. GCT hosted the Mayor and senior staff at an in-person briefing at Deltaport on March 6, 2019, followed by a tour of the terminal which allowed for an open dialogue on the Project location, environmental and community effects, and engagement opportunities. On May 13, 2020, GCT met virtually with the City of Delta to provide a further update on the Project and, in particular, the development of the IPD. GCT understands that the City of Delta wrote to the Minister of Environment and Climate Change in July 2020 requesting that the DP4 Project be assessed as a potential alternative to the proposed RBT2 Project<sup>1</sup>. On December 7, 2020, GCT provided an additional update on the Project to the City Council and senior staff at the City of Delta and addressed specific questions from Council.

Beginning in February 2016, GCT has been engaging provincial Ministries, department staff and relevant agencies, and elected Members of the Legislative Assembly. These meetings offered a chance for GCT to describe the Project, solicit early feedback, and incorporate that feedback into its IPD, DPD, and Early Engagement Plan. Engagement included in-person meetings in Vancouver, Victoria and Delta; tours of GCT Deltaport; emails; and phone calls to provide an overview of the Project and answer any specific questions or concerns. Following the first formal meeting with the BCEAO on March 20, 2020, GCT has had regular weekly meetings with the BCEAO to discuss the proposed Project and its advancement through their environmental assessment process.

GCT has also been actively engaged with federal officials, relevant Ministries, department staff and agencies since January 2015. This early engagement with the federal government has taken a number of forms, including in-person meetings in Vancouver and Ottawa, tours of GCT Deltaport, emails and formal correspondence with updates on the Project. GCT met with IAAC on March 11, 2020, to formally initiate discussions in relation to the Project under the new IAA. Since that time, GCT has had weekly regular meetings with IAAC to discuss the proposed Project and its advancement through the IAAC's impact assessment process.

Further details on previous municipal, provincial and federal engagement, including contacts identified within the various levels of government, are provided in the DP4 Early Engagement Plan.

### 9.2.2 Key Interest or Issues Identified

Table 93 provides early engagement feedback as well as further details on additional feedback received from some government organizations and agencies following the review of the draft DPD on April 1, 2021. As previously mentioned, GCT is committed and continues to engage with various federal, provincial, municipal and international governments and agencies in relation to the Project and has carefully considered their comments which are presented at a high level in the below table.

GCT has compiled all comments provided and considered, where possible how to incorporate or consider the comments in regards to updates to the DPD. However, it was noted and worth mentioning there were a considerable number of comments that were related to the scope and methodology of the Project assessment

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<sup>1</sup> <https://delta.civicweb.net/document/197779?id=8e66b3ab-b5f7-4b17-8540-57444fec6cc4>

which will form the Joint Guidelines and associated plans as described in Sections 1 and 2. In addition, there were comments provided in relation to the Joint Summary of Issues and Engagement document which were more applicable to the IAAC and BCEAO in regards to their regulatory processes. GCT looks forward to continued engagement to inform the Project.

**Table 93 Key Issues Raised by Municipal, Provincial, Federal and United States Governments and Agencies.**

Organization	Issues Raised
Municipal and Regional Government	
City of Delta	Provided considerations for the scope of the assessment for Project-related noise, light pollution, traffic congestion, and overall human health effects. Provided additional questions regarding dredge material, the new overpass on the causeway, cumulative effects and habitat compensation.
Corporation of Delta	Provided specific comments regarding road and rail traffic, port security, cumulative effects assessments, long-term environmental management plans, impact assessments and proposed mitigation measures for traffic, noise, lighting, vibration, air quality, environmental (biofilm), human health disturbance, and impacts of the Project on agricultural land including the amount and location of industrial land required to support the Project.
City of Langley	Provided specific comments regarding the scope of the assessment, Project impacts and proposed mitigation measures for an increase in rail traffic. Funding and projects related to the Gateway Transportation Collaboration Forum.
City of Richmond	Provided specific comments regarding the scope of the assessment, valued components, potential project effects, alternatives to the Project, scope of the cumulative impact assessment, industrial and agricultural land impacts, land-based traffic and transportation impacts, marine traffic impacts and vessel wake impacts, short sea shipping, dredging (carbon-rich deposits), GHG emissions, low carbon technologies, scoping of effects of the environment on the Project, Project alignment with Metro Vancouver’s 2040 Regional Growth Strategy, socio-economic effects (GBA+), mitigation measures for potential effects on human health and community wellbeing, Indigenous interests and opportunities for Indigenous individuals and communities.
City of Surrey	Provided specific comments regarding the scope of the assessment, Project impacts and proposed mitigation measures for increase in rail traffic, and Project funding related to potential road and rail improvement projects.
Metro Vancouver	Provided specific questions regarding clarification on forecasts of GVWD water demand related to Project, consideration of Metro Vancouver plans related to water, air, green infrastructure and regional planning. Additional comments were provided regarding ecosystem services, projects included in the cumulative affects assessment, and potential impacts of invasive species that may be introduced as a result of the project.
Township of Langley	Provided specific comments regarding the scope of the assessment, Project impacts and proposed mitigation measures for increase in rail traffic, and Project funding related to potential road and rail improvement projects.

**Table 93: (Cont'd.)**

Organization	Issues Raised
<b>Provincial Government Agencies</b>	
Ministry of Agriculture, Food and Fisheries	Provided specific questions regarding potential Project activities impact on surrounding agricultural operations and livestock. Encouragement for engagement with local agricultural businesses regarding input to the Project and proposed mitigation measures.
Ministry of Forestry Lands and Natural Resource Operations and Rural Development (FLNRORD)	Provided specific comments regarding scoping considerations for sedimentation patterns, habitat mapping, and monitoring of the tidal marsh.
<b>Federal Government Agencies</b>	
Canadian Coast Guard	Provided specific comments regarding Aids to Navigations, Marine Communications and Traffic Services (MCTS), impact on waterways, Coast Guard waterway design methodology, and local hazards to navigation.
Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC)	Provided specific comments regarding cultural interests, referencing concerns from Indigenous nations, and recognizing and respecting Indigenous rights and interests.
Department of Fisheries and Oceans Canada (DFO)	GCT has been engaging with DFO since 2016 on DP4. DFO recommended early engagement with pacific region representatives, and that a Request to Review be submitted subsequent to the submission of the DPD to further engage DFO in the review of the Project. DFO highlighted key requirements under the federal Fisheries Act and Species at Risk Act that are relevant to the Project.
Employment and Social Development Canada	Provided specific comments regarding the scoping of the impact assessment, local socioeconomic conditions, and hiring strategies for the Project including hiring targets for under-represented groups including Indigenous people, and training opportunities for potential candidates.
Environmental and Climate Change Canada (ECCC)	Provided specific comments regarding concerns around scoping and potential Project effects on biofilm and birds, potential impact to water quality and aquatic receptors, fish, fish habitat and aquatic species, dredging, baseline sediment concentrations and sediment contaminants, solid, liquid and hazardous waste, accidents or malfunctions scenarios, surface and ground water management, GHG emissions, air quality monitoring, carbon sinks, shore power technology, effects to wetlands and wetland functions, and effects to migratory birds.
Health Canada	Provided specific comments regarding scoping for short sea shipping, quality of marine traditional foods, socio-economic impact assessments, health impact assessments, GBA+, human health risk assessments, Project-related changes to social (cultural and/or economic conditions) for Indigenous peoples and effect pathways.

**Table 93: (Cont'd.)**

Organization	Issues Raised
Federal Government Agencies (Cont'd.)	
Indigenous Services Canada (ISC)	Provided specific comments regarding economic opportunities for Indigenous nations, scoping for studies and the assessment, contracting opportunities for Indigenous peoples (construction and operational workforce), cultural sensitivity and awareness training, considerations related to the inclusion of cultural and traditional significance in potential project effects.
Natural Resources Canada	Provided specific comments regarding sea-level rise, seismicity and earthquake hazard, fate and behaviour of oils (bunker fuel) including designs, response capability, safety procedures and spill mitigation, coastal geomorphology modelling, dendritic tidal channels, tidal channel erosion and proposed berm construction.
Parks Canada Agency	Provided specific comments regarding archaeological and heritage sites including both provincial and federal standards, and protocols of Indigenous nations.
Transport Canada	<p>GCT has ongoing engagement with Transport Canada since 2015, issues discussed include port governance and intra-port competition, as well as studies on capacity projections.</p> <p>Provided specific comments regarding the management of federal land, jurisdiction, and ownership, the Oceans Protection Plan and its governance, financial and physical responsibility in the event of a spill, GCT's spill response plan, plans to address GHG emissions, the Cumulative Effects of Marine Shipping Initiative and the Salish Sea Initiative, and the Canadian Navigable Waters Act. In addition, comments were provided on the potential impact to aquatic receptors from dredging, on the existing information on contaminants in sediments, and on the potential for dust and particulate matter to impact water quality and aquatic receptors. Further comments on scoping were also provided for consideration.</p>
VFPA	Issues raised that are subject to judicial review <sup>1</sup>
Women and Gender Equality (WAGE)	Provided specific comments regarding Indigenous engagement and identification and awareness of gender and age groups that have been engaged and barriers for engagement, government public and stakeholder engagement and how information was made accessible, scoping related to project location in relation to health-related services, potential impacts to health-related services, recreational facilities and infrastructure, disaggregated data in socio-economic assessments, socio-economic setting, labour markets and existing workforce, potential impacts on diverse groups using major roads, equitable hiring procedures, potential effects on human health and community wellbeing and project-related changes on Indigenous People and GBA+ application and training.

<sup>1</sup> The VFPA's administrative, permitting and other powers with respect to the DP4 Project, including those related to port operations, are currently the subject of judicial review.

**Table 93: (Cont'd.)**

Organization	Issues Raised
United States Government Agencies	
Washington State Department of Ecology	Provided specific comments regarding the scoping and consideration for the marine shipping aspects including: Reciprocal Arrangement Agreements between Canadian and Washington waters, effectiveness of emergency response system, tug escorts for containers without independent fuel tanks, consideration of vessel noise on potential effects to SRKWs, emergency response towing vessel, cumulative effects and engaging with federally recognized Tribes in Washington State.

### 9.2.3 Planned Government Engagement

GCT has the following goals for engaging with municipalities and government agencies (where appropriate, taking COVID-19 restrictions into account) so that they can better understand the proposed Project, ask questions, and provide feedback:

- Provide email updates to municipalities and government agencies on the Project;
- Share community engagement opportunities;
- Track concerns raised by municipalities and government agencies;
- Provide formal and timely responses to municipalities and government agencies related to Project concerns;
- Offer multiple in-person presentations to staff and council;
- Offer GCT Deltaport site tours;
- Request feedback on public and stakeholder engagement activities; and
- Consider feedback regarding Project design and communicate the results of these considerations.

In addition to the above, GCT will continue to seek recommendations from municipalities and elected officials on how best to engage their community on the Project such as locations for the open houses, or suggested community events. In addition to publicly available demographic information, GCT will seek feedback from local governments on reaching underrepresented populations to ensure engagement activities are inclusive and representative. Further details can be found in the GCT DP4 Early Engagement Plan.

### 9.2.4 Adjusting Tools of Engagement

Given the evolving response and associated impacts of COVID-19, and the capacity of organizations and individuals to provide feedback at this time, GCT is proposing the following methods of digital engagement be used to ensure robust engagement still takes place. These methods will continue to be deployed for engagement purposes should in-person meetings be permitted in the future. Towards that end, GCT will:

- Establish video conferencing via Zoom for smaller groups and Facebook live for larger groups;
- Conduct telephone town halls for those without the capability to connect via the internet;
- Ensure online engagement tools are well distributed and easily found on the GCT’s Project website; and
- Consider and incorporate further engagement methods, as directed or requested.



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## **APPENDIX A**

# **IAAC CONCORDANCE TABLE FOR DETAILED PROJECT DESCRIPTION REQUIREMENTS**

## APPENDIX A: IAAC CONCORDANCE TABLE FOR PROJECT DESCRIPTION REQUIREMENTS

Detailed Project Description Information Requirement	DPD Section	DPD Tables/Figures
1. The project's name, type or sector and proposed location.	Section 1.1 Project Status and History	
2. The proponent's name and contact information and the name and contact information of their primary representative for the purpose of the description of the project.	Section 1.2. Proponent Information	Table 1
3. A summary of and the results of any engagement undertaken with any jurisdictions or other party, including a description of how the proponent intends to address the issues raised in the summary referred to in subsection 14(1) of the <i>Act</i> (Summary of Issues).	Section 2 Engagement Summary Section 8 Indigenous Engagement and Consultation Section 9 Engagement and Consultation with Governments, the Public and other Parties Appendix C	
4. A summary of and the results of any engagement undertaken with Indigenous peoples of Canada, including: a. a list of the Indigenous groups that may be affected by the project, including those groups that identified themselves during the planning phase as being potentially affected; and b. a description of how the proponent intends to address the issues raised in the Summary of Issues, including the perspective of Indigenous groups regarding any potential adverse impact that the project may have on the rights of the Indigenous peoples of Canada recognized and affirmed by section 35 of the <i>Constitution Act, 1982</i> .	Section 8 Indigenous Engagement and Consultation Appendix C	
5. Any study or plan relevant to the project, that is being or has been conducted in respect of the region where the project is to be carried out, including any regional assessment that is being or has been carried out under section 92 or 93 of the <i>Act</i> , or by any jurisdiction, including by or on behalf of an Indigenous governing body, if the study or plan is available to the public.	Section 6.1 Past and Present Environmental Studies in the Region	Table 13
6. Any strategic assessment, relevant to the project, that is being or has been carried out under section 95 of the <i>Act</i>	Section 6.1 Past and Present Environmental Studies in the Region	
7. An updated statement of the purpose of and need for the project, including any potential benefits	Section 1.3 Project Purpose, Need, and Rationale	Table 2, Figure 3
8. The provisions in the schedule to the Physical Activities Regulations describing the project, in whole or in part.	Section 1.4 Environmental Assessment Regulatory Requirements	Table 3
9. A description of all activities, infrastructure, permanent or temporary structures and physical works to be included in and associated with the construction, operation, decommissioning of the project, including their purpose, size and capacity.	Section 3.3 Project Overview and Components Section 3.4 Project Activities	Tables 4 to 6

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Detailed Project Description Information Requirement	DPD Section	DPD Tables/Figures
10. An estimate of the maximum production capacity of the project and a description of the production processes to be used.	Section 3.3 Project Overview and Components	Tables 4 to 6
11. The anticipated schedule for the project's construction, operation, decommissioning, and abandonment, including any expansions of the project.	Section 3.5 Project Timing	Table 8, Figure 7
12. A description of; <ul style="list-style-type: none"> <li>a. potential alternative means of carrying out the project that the proponent is considering and that are technically and economically feasible, including through the use of best available technologies; and,</li> </ul>	Section 3.8 Alternative means of Carrying out the Project	
<ul style="list-style-type: none"> <li>b. potential alternatives to the project that the proponent is considering, that are technically and economically feasible and directly related to the project</li> </ul>	Section 3.7 Alternatives to the Project	
13. A description of the project's proposed location, including; <ul style="list-style-type: none"> <li>a. Its proposed geographic coordinates including, for linear development projects, the proposed locations of major ancillary facilities that are integral to the project, and a description of the spatial boundaries of the proposed study corridor.</li> </ul>	Section 3.2 Project Location	Figures 1, 4 and 5
<ul style="list-style-type: none"> <li>b. Site maps produced of an appropriate scale in order to determine the project's proposed general location and the spatial relationship of the project components.</li> </ul>	Section 3.2 Project Location	Figures 1, 4 and 5
<ul style="list-style-type: none"> <li>c. The legal description of land to be used for the project, including, if the land has already been acquired, the title, deed or document and any authorization relating to a water lot. The level of detail should be appropriate for the project type.</li> </ul>	Section 4.1 Land Ownership and Tenures	Figure 8
<ul style="list-style-type: none"> <li>d. The project's proximity to any permanent, seasonal or temporary residences and proximity to the nearest affected communities.</li> </ul>	Section 3.2 Project Location Section 6.4.2 Human Health Setting Section 8.3 Indigenous Nations	Figures 1, 4 and 5
<ul style="list-style-type: none"> <li>e. the project's proximity to land used for traditional purposes by Indigenous peoples of Canada, land in a reserve as defined in subsection 2(1) of the <i>Indian Act</i>, First Nation land as defined in subsection 2(1) of the <i>First Nations Land Management Act</i>, land that is subject to a comprehensive land claim agreement or a self-government agreement and any other land set aside for the use and benefit of Indigenous peoples of Canada; and</li> </ul>	Section 8.3 Indigenous Nations	
<ul style="list-style-type: none"> <li>f. the project's proximity to any federal lands.</li> </ul>	Section 4.1 Land Ownership and Tenures	Figures 4, 5 and 8
14. A description of the physical and biological environment of the project's location, based on information that is available to the public.	Section 6.3 Biological Setting	

## APPENDIX A: IAAC CONCORDANCE TABLE FOR PROJECT DESCRIPTION REQUIREMENTS

Detailed Project Description Information Requirement	DPD Section	DPD Tables/Figures
15. A description of the health, social and economic context in the region where the project is located, based on information that is available to the public or derived from any engagement undertaken.	Section 6.4 Human Environment Setting Section 6.4.1 Socio-economic Setting Section 6.4.2 Human Health Setting	
16. A description of any financial support that federal authorities are, or may be, providing to the project.	Section 1.1 Project Status and History	
17. A description of any federal lands that may be used for the purpose of carrying out the project.	Section 4 Land and Water Use	Figure 8
18. A list of the permits, licenses, or other authorizations that may be required by jurisdictions that have powers, duties or functions in relation to an assessment of the project's environmental effects.	Section 5.1 Permits, Licenses, Approvals and Authorizations	Table 11
19. A description of any changes that, as a result of the carrying out of the project, may be caused to the following components of the environment that are within the legislative authority of Parliament	Section 7.2 Potential Effects in Relation to <i>Impact Assessment Act</i> Requirements	Table 15
a. fish and fish habitat, as defined in subsection 2(1) of the <i>Fisheries Act</i> ,	Section 7.2 Potential Effects in Relation to <i>Impact Assessment Act</i> Requirements	Table 15
b. aquatic species, as defined in subsection 2(1) of the <i>Species at Risk Act</i> ; and	Section 7.2 Potential Effects in Relation to <i>Impact Assessment Act</i> Requirements	Table 15
c. migratory birds, as defined in subsection 2(1) of the <i>Migratory Birds Convention Act, 1994</i> .	Section 7.2 Potential Effects in Relation to <i>Impact Assessment Act</i> Requirements	Table 15
20. A description of any changes to the environment that, as a result of the carrying out of the project, may occur on federal lands, in a province other than the province in which the project is proposed to be carried out or outside Canada.	Section 7.3 Potential Environmental effects on Federal Lands in a Province other than the province in which the project is proposed to be carried out or outside Canada	Tables 16 and 17

## APPENDIX A: IAAC CONCORDANCE TABLE FOR PROJECT DESCRIPTION REQUIREMENTS

Detailed Project Description Information Requirement	DPD Section	DPD Tables/Figures
<p>21. With respect to the Indigenous peoples of Canada, a description of the impact-that, as a result of the carrying out of the project, may occur in Canada and result from any change to the environment-on:</p> <ul style="list-style-type: none"> <li>physical and cultural heritage</li> <li>the current use of lands and resources for traditional purposes and</li> <li>any structure, site or thing that is of historical, archaeological, paleontological or architectural significance,</li> </ul> <p>based on information that is available to the public or derived from any engagement undertaken with Indigenous peoples of Canada.</p>	<p>Section 7.7 Potential Effects on Heritage Resources</p> <p>Section 7.8 GCT's Preliminary Understanding of Potential Effects on Indigenous Interests from Project Activities</p>	Tables 22 and 23
<p>22. A brief description of any change that, as a result of the carrying out of the project, may occur in Canada to the health, social or economic conditions of Indigenous peoples of Canada, based on information that is available to the public or derived from any engagement undertaken with Indigenous peoples of Canada.</p>	<p>Section 7.5 Potential Socio-economic Effects</p> <p>Section 7.6 Potential Effects on Human Health, and Community Wellbeing</p> <p>Section 7.8 GCT's Preliminary Understanding of Potential Effects on Indigenous Interests from Project Activities</p>	Tables 20, 21 and 23
<p>23. An estimate of any greenhouse gas emissions associated with the project.</p>	Section 7.4.3 Greenhouse Gas Emissions	Appendix E
<p>24. A description of any waste and emissions that are likely to be generated — in the air, in or on water and in or on land — during any phase of the project and a description of the plan to manage them.</p>	Section 7.4 Emissions, Discharges and Waste	Tables 18 and 19
<p>25. A plain-language summary of the information that is required under items 1 to 24 in English and in French.</p>	Summary to be provided for final submission to IAAC	

## **APPENDIX B**

# **BCEAO CONCORDANCE TABLE FOR DETAILED PROJECT DESCRIPTION REQUIREMENTS**

## APPENDIX B: BCEAO CONCORDANCE TABLE FOR PROJECT DESCRIPTION REQUIREMENTS

Detailed Project Description Information Requirement	DPD Section	DPD Tables/Figures
<b>Executive Summary</b>		
1. A plain language summary of the IPD that is clear and concise.	N/A	
<b>General Info and Contacts</b>		
2. Any updates to information in the IPD	Section 1.1 Project Status and History	
3. Anticipated cost for construction and decommissioning as well as projected annual operating costs	Section 3.6 Project Capital Costs	
<b>Purpose and Rationale</b>		
4. Any updates to information in IPD:	Section 1.3 Project Purpose, Need, and Rationale	
<b>Legislative and Regulatory Context</b>		
5. A general rationale for why the project has been proposed; and	Section 1.4 Environmental Assessment Regulatory Requirements Section 1.3 Project Purpose, Need and Benefits	
<b>Project Status and History</b>		
6. Any updates to information in IPD	Section 1.4 Environmental Assessment Regulatory Requirements	Table 3
<b>Project Timing</b>		
7. Any updates to information in IPD, including a justification for any updates/changes to project timing and a description of how engagement was considered	Section 3.5 Project Timing	
8. A list of timelines for the proposed project's EA and permitting processes and expected timing to submit key permit applications	Section 3.5 Project Timing	Table 8, Figure 7
<b>Project Location, Activities and Components</b>		
9. Any updates to information in the IPD, including a justification for any updates/changes to the project location, activities and/or components, and a description of how engagement was considered;	Section 3.1 Project Updates and Changes Section 3.2 Project Location Section 3.4 Project Activities	Table 4 Appendix C
10. Include what further information, if any, is needed to confirm design and siting options, and approximate timelines; and	Section 3.8 Alternatives to the Project Section 3.9 Alternative Means of Carrying out the Project	
11. A description of the work that has been conducted to arrive at the proposal, including what other options were considered and how engagement was considered.	Section 3.8 Alternatives to the Project Section 3.9 Alternative Means of Carrying out the Project	



## APPENDIX B: BCEAO CONCORDANCE TABLE FOR PROJECT DESCRIPTION REQUIREMENTS

Detailed Project Description Information Requirement	DPD Section	DPD Tables/Figures
<b>Maps and Shapefiles</b>		
12. Any updates to information in the IPD;		All figures
13. When known, include landscape features of importance to Indigenous nations and local communities in maps;		All figures
14. Any new maps showing the boundary within which the project would be built, including updated location, project components and transportation routes;		All figures
15. Maps must be presented in the required standard format with legible grids and suitable scaling (typically 1:100,000 to 1:150,000 for centralized projects such as a mine, and up to 1:1,500,000 or 1:1,250,000 scale for linear projects such as a pipeline or transmission line); and		All figures
16. Maps must also include a national Topographic System (NTS) Map number, latitude and longitude references, titles, a north arrow, and relevant legends.		All figures
<b>Indigenous Nations Interests</b>		
17. Any updates to information in the IPD, including a justification for updates/changes and a description of how engagement was considered	Section 8.4 Summary of Preliminary Engagement with Indigenous Nations,	
18. For each Indigenous nation identified, an overview of engagement activities that have been carried out, a description of issues that have been raised with respect to the proposed project, and an explanation of how those issues have been or will be addressed by the proponent;	Section 8.4 Summary of Preliminary Engagement with Indigenous Nations	Tables 25 to 89
19. A description of how Indigenous nations plan to work with the proponent moving forward;	Section 8.7 Summary of Planned Engagement Activities and Opportunities to Work Together	
20. A list of agreements the proponent has entered into with Indigenous nations	Section 8.5 Summary of Agreements with Indigenous Nations	
21. A description of opportunities for the proponent to work with the EAO and Indigenous nations	Section 8.7 Summary of Planned Engagement Activities and Opportunities to Work Together	
22. Additional information provided by participating Indigenous nations;	Section 8.4 Summary of Preliminary Engagement with Indigenous Nations	

## APPENDIX B: BCEAO CONCORDANCE TABLE FOR PROJECT DESCRIPTION REQUIREMENTS

Detailed Project Description Information Requirement	DPD Section	DPD Tables/Figures
23. An identification of potential effects on Indigenous interests;	Section 7.8 GCT's Preliminary Understanding of Potential Effects on Indigenous Interests from Project Activities	Table 23
24. A description of how this engagement and information was considered in the DPD, and corresponding changes that were made with justification for these changes	Section 2 Engagement Summary Section 8.4 Summary of Preliminary Engagement with Indigenous Nations Section 8.6 Preliminary Consideration of Indigenous Interests in Project Design	
25. A description of how information contained in the EAO's Summary of Engagement provided by the EAO was addressed in the DPD	Section 8.2 Introduction	Appendix C
<b>Biophysical Environment</b>		
26. Any updates to information in the IPD, including a justification for updates/changes and a description of how engagement was considered	Section 6.3 Biological Setting	
27. A table showing a list of studies that are underway and those that are anticipated, including guidance and standards to be used in preparing these studies;	Section 6.1 Past and Present Environmental Studies in the Region	Tables 13 and 14
28. A description of engagement that occurred following acceptance of the IPD and Engagement Plan, including any additional information collected during this period on sensitive or vulnerable environmental values that may be affected by the proposed project and any further understanding of the potential effects of the project, including cumulative effects	Section 6.4.1 Socio-economic Setting	
29. A description of future methods of information collection that will occur through continuing engagement;	Section 6.1 Past and Present Environmental Studies in the Region	Table 14
30. A description of Indigenous knowledge that may have been incorporated into the description of existing biophysical environment, with permission of the Indigenous nation; and	Section 8 Indigenous Engagement and Consultation	
31. A description of how this engagement and information was considered, and corresponding changes that were made with justification for these changes.	Section 6.1 Past and Present Environmental Studies in the Region	

## APPENDIX B: BCEAO CONCORDANCE TABLE FOR PROJECT DESCRIPTION REQUIREMENTS

Detailed Project Description Information Requirement	DPD Section	DPD Tables/Figures
<b>Human and Community Wellbeing</b>		
32. Any updates to information in the IPD, including a justification for updates/changes and a description of how engagement was considered	Section 6.4.1 Socio-economic Setting	
33. An outline of the anticipated number of construction and operating jobs and anticipated percent of workforce from local community	Section 3.7.1 Construction Workforce Section 3.7.2 Operational Workforce Section 3.7.3 Workforce Environment	
34. A description of how the proposed project may affect the local and regional economy	Section 7.5 Potential Socio-economic Effects	Table 20
35. A description of the engagement that occurred following acceptance of IPD and Engagement Plan and any additional information collected during this period regarding sensitive or vulnerable economic, social, heritage, or health values that may be affected by the proposed project	Section 6.1 Past and Present Environmental Studies in the Region Section 6.4.1 Socio-economic Setting	
36. A description of how this engagement and information was considered, and corresponding changes that were made with justification for these changes. Refer to the Human and Community Wellbeing Guidelines for further information.	Section 8.4 Summary of Preliminary Engagement with Indigenous Nations Section 6.1 Past and Present Environmental Studies in the Region Section 6.4.1 Socio-economic Setting	
<b>Emissions, Discharges and Waste</b>		
37. Any updates to information in the IPD, including a justification for updates or changes and a description of how engagement was considered;	Section 7.4 Emissions, Discharges, and Waste	
38. An estimate of direct and indirect project GHG emissions by phase	Section 7.4.3 Greenhouse Gas Emissions	Appendix E
39. A description of the potential effects on the province being able to meet its targets under the <i>Greenhouse Gas Reduction Targets Act</i> ;	Section 7.4.3 Greenhouse Gas Emissions	Appendix E
40. A justification for updates or changes to expected emissions, effluents, discharges and/or wastes and a description of how engagement was considered.	Section 7.4 Emissions, Discharge and Waste	Appendix E
<b>Public and Environmental Safety</b>		
41. Any updates to information in the IPD, including a justification for updates/changes and a description of how engagement was considered;	Section 7.9.1 Project Updates and Changes	
42. Include a description of potential project-related scenarios when there is a real or perceived risk of a malfunction or accident;	Section 7.9.2 Accident or Malfunction Scenarios	Table 24

## APPENDIX B: BCEAO CONCORDANCE TABLE FOR PROJECT DESCRIPTION REQUIREMENTS

Detailed Project Description Information Requirement	DPD Section	DPD Tables/Figures
43. Identification of moderate-to high-risk potential malfunctions or accidents associated with the proposed project and how they will be managed:	Section 7.9.3 Potential Accidents and Malfunctions Scenarios and Mitigation	
44. Refer to risk disclosure standards and provincial risk management policy, including the Risk Management Guideline for the B.C. Public Sector (Province of British Columbia Risk Management Branch and Government Security Office, April 2019)		
<b>Alternative Means to Carry Out the Project</b>		
45. Any updates to information in the IPD, including a justification for updates/changes and a description of how engagement was considered;	Section 3.9 Alternative Means of Carrying out the Project	
46. Provide clear definitions with transparent weighting and criteria for assessing alternative means	Section 3.9 Alternative Means of Carrying out the Project	
<b>Effects of the Environment on the Project</b>		
47. Any updates to information in the IPD, including a justification for updates/changes and a description of how engagement was considered;	Section 7.10 Effects of the Environment on the Project	
48. A justification for updates/changes to potential effects and a description of how engagement was considered, especially Indigenous knowledge and local knowledge gathered during Early Engagement.	Section 7 Potential Effects of the Project	
<b>Land and Water Use</b>		
49. Any updates to information in the IPD, including a justification for updates/changes and a description of how engagement was considered	Section 4 Land and Water Use	
50. Identification of the location of previously disturbed site or green field site, agricultural land, foreshore	Section 6.2 Previous Disturbances Section 6.3 Biological Setting	
51. Legal information regarding land title, authorization, permits	Section 5.1 Permits, Licenses, Approvals and Authorizations Section 4.1 Land Ownership and Tenures	Tables 9 and 11 Figure 8
52. Identification of the proximity to seasonal or temporary residences	Section 4.1 Land Ownership and Tenures	
53. Description of the relationship to known regional initiatives (e.g., Elk Valley Water Quality Plan or Indigenous land use plans)	Section 4.1 Land Ownership and Tenures Section 6.1 Past and Present Environmental Studies in the Region Section 7.4.1 Air Emissions	Tables 9 and 13
54. A description of project land and water use following engagement clearly noting any changes and a justification for why changes were made and how engagement was considered	Section 4.1 Land Ownership and Tenures	Table 9

## APPENDIX B: BCEAO CONCORDANCE TABLE FOR PROJECT DESCRIPTION REQUIREMENTS

Detailed Project Description Information Requirement	DPD Section	DPD Tables/Figures
<b>Land Use Plans</b>		
55. Any updates to information in the IPD, including a justification for updates/changes and a description of how engagement was considered	Section 4.1 Land Ownership and Tenures	Table 9 Figure 8
56. A justification for updates/changes to relevant provincial land use plans and a description of how engagement was considered	Section 4.2 Planning Context and Zoning	
<b>Potential Project Effects</b>		
57. Any updates to information in the IPD, including a justification for updates/changes and a description of how engagement was considered	Section 7.1 Project Updates and Changes	
58. A description of potential positive and negative effects of the project on the biophysical and human environments, and Indigenous interests, including any potential cumulative effects	Section 7 Potential Effects of the Project	
59. A summary of key conclusions from any biophysical feasibility studies undertaken that may be pertinent to understanding potential interactions, if applicable	Section 6.1 Past and Present Environmental Studies in the Region	
60. An initial description of measures to prevent or reduce the potential negative effects to an acceptable level. Include measures that could be integrated into project design, compliance with applicable regulations, standards, codes of practice, or Best Management Practices, corporate management systems, and/or project-specific measures that will be implemented	Section 7.13 Mitigation and Management Approaches	
61. A brief description of proposed monitoring programs, if known, that will be implemented to measure the effectiveness of mitigations to prevent or reduce the potential negative project effects	Section 7.14 Monitoring	

## **APPENDIX C**

# **RESPONSES TO SUMMARY OF ISSUES**

## **APPENDIX C:       RESPONSES TO ISSUES AND INDIGENOUS INTERESTS RAISED IN THE JOINT SUMMARY OF ISSUES AND ENGAGEMENT**

Following the submission of the IPD on September 18, 2020, IAAC and BCEAO conducted a public comment period from October 13 to November 27, 2020. The public, Indigenous nations, stakeholders, and local organizations provided a total of 83 comments which reflect issues that they feel are relevant to the Project. Based on their feedback received during this public comment period, IAAC and BCEAO released the Joint Summary of Issues and Engagement (JSOIE) document for the Project on December 23, 2020, in accordance with Section 14(1) of the IAA and Section 13(5)(a) of the BCEAA (2018). Appendix C provides GCT's detailed responses and proposed approaches to address each of these issues and Indigenous Interests, raised in the JSOIE, before November 27, 2020, as well as providing references to other sections of the DPD, which contain additional information relevant to these issues. At the request of CIRNAC, the responses to issues and Indigenous Interests raised by the First Nations of the Maa-Nulth Treaty Society, Sc'ianew First Nation, Esquimalt Nation, and Pauquachin First Nation have been disaggregated. Issues and Indigenous Interests raised by the Cowichan Nation Alliance and the S'ólh Téméxw Stewardship Alliance remain aggregated, as they were in the JSOIE.

As this Project is undergoing a coordinated approach, both BCEAO and IAAC will determine if an impact assessment is required for this Project, following which, GCT will prepare a first draft of the draft Joint Guidelines. The Joint Guidelines will outline the scoping for the environmental assessment, consider the issues raised in the Summary of Issues document and require participation, collaboration, and incorporation of feedback from all PINs and affected Indigenous nations. Further documents include a Public Participation Plan, Cooperation Plan, Permitting Plan, Indigenous Engagement and Partnership Plan will follow and be prepared by the BCEAO and IAAC in accordance with the Federal and Provincial requirements. The environmental assessment certificate application/ Impact Statement will be prepared by GCT and will meet the requirements of both the IAA and the BCEAA, after which, both IAAC and BCEAO will make a Federal and Provincial decision on the Project.

GCT has prepared responses as shown in Appendix C based on the approach to the Project and the environmental assessment which will be confirmed through the development of the Joint Guidelines. A first draft of the Joint Guidelines will be drafted by GCT and then submitted to IAAC and BCEAO who will tailor the document and consult on it prior to the issuance of the final Joint Guidelines. It should be noted that following the publishing of the JSOIE document, the City of Richmond provided their own comments on the IPD. It was agreed in consultation with agencies that the City of Richmond comments would be responded to within the DPD and as a result, GCT has included them as a separate table (Table C3) within Appendix C. The issues raised will be an important component for the development of the Joint Guidelines and a focus in future engagement activities to support the establishment and confirm the scope of the Project's environmental assessment.

**TABLE C1: RESPONSES TO ISSUES AND INDIGENOUS INTERESTS RAISED IN THE JOINT SUMMARY OF ISSUES AND ENGAGEMENT.**

Number	Indigenous Nation	Summarized Understanding of Issues and Interests Raised in the JSOIE	GCT's Response	Reference in the DPD
1	Cowichan Nation communities (Cowichan Tribes, Halalt First Nation, Lyackson First Nation, Penelakut Tribe, Stz'uminus First Nation)	Cowichan Nation communities have and continue to utilize this proposed Project area since time immemorial. Cowichan Nation communities' members have utilized and continue to utilize the Salish Sea and surrounding marine and terrestrial waterways for Food, Social, and Ceremonial purposes, as well as for Economic opportunities.	GCT acknowledges Cowichan Nation communities' interests in the Project area and these topics. GCT has engaged with Cowichan Nation Alliance on this topic previously and understands its importance through these engagements. These topics will be reflected in the DPD and will be subject to ongoing engagement.	Section 8.4.1 Cowichan Tribes, Section 8.4.5 Halalt First Nation, Section 8.4.10 Lyackson First Nation, Section 8.4.17 Penelakut Tribe, Section 8.4.27 Stz'uminus First Nation
2	Cowichan Nation communities (Cowichan Tribes, Lyackson First Nation, Penelakut Tribe, Stz'uminus First Nation, Halalt First Nation)	Must recognize Aboriginal Rights and Title of other Indigenous nations in this area.	GCT recognizes the rights and title of all Indigenous nations that are participating in the Project.	Section 8.3 Indigenous Nations
3	Cowichan Nation communities (Cowichan Tribes, Lyackson First Nation, Penelakut Tribe, Stz'uminus First Nation, Halalt First Nation)	British Columbia's and Canada's commitments to implementing the United Nations Declaration on the Rights of Indigenous Peoples must be reflected throughout the document.	GCT supports the principles of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). The processes set out in the <i>Impact Assessment Act</i> and the <i>BC Environmental Assessment Act</i> aligns fundamentally with the objectives of Free, Prior and Informed Consent. As a result, through participation in the Impact Assessment, Indigenous nations can provide their Free, Prior and Informed Consent in relation to the Project.  Further information about this can be found in the following document: <a href="https://www2.gov.bc.ca/assets/gov/environment/natural-resource-stewardship/environmental-assessments/environmental-assessment-revitalization/documents/free_prior_informed_consent_in_an_ea_context.pdf">https://www2.gov.bc.ca/assets/gov/environment/natural-resource-stewardship/environmental-assessments/environmental-assessment-revitalization/documents/free_prior_informed_consent_in_an_ea_context.pdf</a> .	Section 1.4 Environmental Assessment Regulatory Requirements
4	Cowichan Nation communities (Cowichan Tribes, Lyackson First Nation, Penelakut Tribe, Stz'uminus First Nation, Halalt First Nation)	Specific questions regarding past studies and data collection regarding sediment, disposal at sea, eelgrass and intertidal marsh habitat, water quality, noise.	Discussions with Cowichan Nation communities on past studies have begun. GCT's technical personnel will work with Cowichan Nation communities to identify specific areas where gaps exist, and where further information and studies are required. The creation of the Joint Guidelines, led by federal and provincial regulators and supported by additional formal engagement will be an important part of this process.	Section 8.4.1 Cowichan Tribes, Section 8.4.5 Halalt First Nation, Section 8.4.10 Lyackson First Nation, Section 8.4.17 Penelakut Tribe, Section 8.4.27 Stz'uminus First Nation
5	Cowichan Nation communities (Cowichan Tribes, Lyackson First Nation, Penelakut Tribe, Stz'uminus First Nation, Halalt First Nation)	Specific questions regarding mitigation measures for fish and fish habitat, water quality, Southern Resident Killer Whale, scour protection, dust control during construction, and spill response.	GCT is committed to meaningful engagement on proposed mitigation measures as the Project progresses through the Impact Assessment process and looks forward to engaging with Cowichan Nation communities on this topic.	Section 8.4.1 Cowichan Tribes, Section 8.4.5 Halalt First Nation, Section 8.4.10 Lyackson First Nation, Section 8.4.17 Penelakut Tribe, Section 8.4.27 Stz'uminus First Nation
6	Cowichan Nation communities (Cowichan Tribes, Lyackson First Nation, Penelakut Tribe, Stz'uminus First Nation, Halalt First Nation)	Concern regarding the Short Sea Shipping proposal and not having enough information on the potential impacts of this activity versus trucks.	GCT acknowledges that Cowichan Nation communities would like to know more about the net benefits and potential adverse impacts of using short sea shipping. As explained in the DPD Section 3.4.4, a short sea shipping berth is being considered for inclusion into the Project, as marine shipping of containers on barges along the coast aligns with federal government initiatives and Metro Vancouver plans, and GCT's objective to increase operational efficiency and reduce impacts of truck transportation from GCT Deltaport. Short sea shipping is estimated to be 3.7 times more fuel-efficient than transportation by truck (Metro Vancouver, 2020a) which in turn leads to reduced fuel costs and consumption, reduced GHG emissions, less noise and air pollution. However, GCT is considering a short sea shipping berth in anticipation of future use as there are currently no off-terminal short sea shipping facilities to accommodate container movement from GCT Deltaport and none are planned. It is not possible at this stage to ascertain if/when or where such facilities would be constructed. It is therefore also impossible to define the vessel routes or volumes associated with short sea shipping. If plans for off-terminal short-sea shipping facilities are progressed during the Impact Assessment it may be possible to define vessel operational requirements associated with barging to that facility, and incorporate into the Impact Assessment at that time.  GCT will continue to engage with Cowichan Nation communities to determine further information or studies that may be required to address Cowichan Nation communities' concerns.	Section 3.4.4 Physical activities incidental to the Project, Section 8.4.1 Cowichan Tribes, Section 8.4.5 Halalt First Nation, Section 8.4.10 Lyackson First Nation, Section 8.4.17 Penelakut Tribe, Section 8.4.27 Stz'uminus First Nation Section 8.7 Summary of Planned Engagement Activities and Opportunities to Work Together



**TABLE C1: RESPONSES TO ISSUES AND INDIGENOUS INTERESTS RAISED IN THE JOINT SUMMARY OF ISSUES AND ENGAGEMENT.**

Number	Indigenous Nation	Summarized Understanding of Issues and Interests Raised in the JSOIE	GCT's Response	Reference in the DPD
7	Cowichan Nation communities (Cowichan Tribes, Lyackson First Nation, Penelakut Tribe, Stz'uminus First Nation, Halalt First Nation)	Inclusion of communities in environmental and heritage monitoring.	GCT will work with Cowichan Nation communities and with government agencies to evaluate appropriate environmental and heritage monitoring for the Project, which could include participation by Indigenous communities.	Section 8.4.1 Cowichan Tribes, Section 8.4.5 Halalt First Nation, Section 8.4.10 Lyackson First Nation, Section 8.4.17 Penelakut Tribe, Section 8.4.27 Stz'uminus First Nation Section 8.7 Summary of Planned Engagement Activities and Opportunities to Work Together
8	Cowichan Nation communities (Cowichan Tribes, Lyackson First Nation, Penelakut Tribe, Stz'uminus First Nation, Halalt First Nation)	Job opportunities and need for accommodations for workers outside of Metro Vancouver.	In discussion with Cowichan Nation communities, they indicated that Cowichan people look for job opportunities in the Lower Mainland but face problems of finding suitable and affordable accommodation. GCT will continue discussions on job opportunities and accommodations for workers outside of Metro Vancouver both during construction and in the operation of DP4. This discussion will also depend on CN associations with trade organizations during construction and operation.	Section 8.4.1 Cowichan Tribes, Section 8.4.5 Halalt First Nation, Section 8.4.10 Lyackson First Nation, Section 8.4.17 Penelakut Tribe, Section 8.4.27 Stz'uminus First Nation
9	First Nations of the Maa-nulth Treaty Society	Effects of the Project on the environment, including cumulative effects, must be thoroughly assessed.	Section 7.11 of the DPD commits that "a cumulative effects assessment will be completed that considers the potential for residual effects of the Project on specific valued components (e.g., environmental, social, economic), combined with the effects of other past, current or reasonably foreseeable projects that overlap with the Project study areas." The projects and developments for inclusion in the cumulative effects assessment related to Valued Components (VCs) are typically determined by regulators, with input from groups such as Indigenous nations and stakeholders. GCT appreciates this feedback on the scope of the cumulative effects assessment for regulators' consideration. A cumulative effects assessment is also a part of the assessment of effects to Indigenous Interests. In addition to work on cumulative effects assessment through the Impact Assessment, GCT will work with the Indigenous Nations and government on initiatives that support the objectives of programs such as the Government of Canada's Ocean Protection Plan. Section 6.1 of the DPD also states that "GCT has established a CAD 200,000 fund to support Indigenous-led initiatives aimed at increasing both participation and collaboration in the cumulative-effects assessment of the south Salish Sea off BC's coast. The funding initiative is not specific to the DP4 Project but may inform the assessments of projects in the area." Participating Indigenous nations can bring forward proposals for other areas to be included, such as the Fraser River.	Section 8.4.4 First Nations of the Maa-nulth Treaty Society Section 7.11 Potential Cumulative Effects
10	First Nations of the Maa-nulth Treaty Society	Effective monitoring throughout life of Project required.	GCT will work with the First Nations of the Maa-nulth Treaty Society and government agencies to ensure that appropriate monitoring is defined within the Impact Assessment.	Section 8.4.4 First Nations of the Maa-nulth Treaty Society Section 8.7 Summary of Planned Engagement Activities and Opportunities to Work Together
11	First Nations of the Maa-nulth Treaty Society	Negative impacts must be avoided or mitigated to the greatest extent possible; rehabilitation required where harm is done	GCT's Impact Assessment for an joint Environmental Assessment Certificate and Decision Statement will provide a comprehensive and robust assessment of potential adverse effects of the Project, including mitigation and assessment of residual effects. Tables 15 and 16 in the DPD outlines potential effects from the Project and identifies potential mitigation measures and off-sets. GCT will continue to work with Indigenous nations to determine if there are other potential effects and to assess how they may be avoided or mitigated.	Section 8.4.4 First Nations of the Maa-nulth Treaty Society Table 15 Potential Effects in Relation to Impact Assessment Requirements Table 16 Other Potential Effects of the Project
12	First Nations of the Maa-nulth Treaty Society	Compensation required for any cultural interference or loss suffered as a result of the harm caused by Project.	GCT will work with Indigenous nations to avoid potential cultural interference or loss associated with the Project. Where potential interactions occur between the Project and culture, GCT will work with Indigenous nations to develop and apply mitigation measures.	Section 8.4.4 First Nations of the Maa-nulth Treaty Society
13	First Nations of the Maa-nulth Treaty Society	Concurrent with a decline in resources there is a shift in the economy from resource extraction to one centered around international trade.	GCT has discussed this issue with the First Nations of the Maa-nulth Treaty Society and will facilitate discussions between the First Nations of the Maa-nulth Treaty Society and the marine shipping industry to better understand the implication of this issue.	Section 8.4.4 First Nations of the Maa-nulth Treaty Society

**TABLE C1: RESPONSES TO ISSUES AND INDIGENOUS INTERESTS RAISED IN THE JOINT SUMMARY OF ISSUES AND ENGAGEMENT.**

Number	Indigenous Nation	Summarized Understanding of Issues and Interests Raised in the JSOIE	GCT's Response	Reference in the DPD
14	First Nations of the Maa-nulth Treaty Society	Nations must receive a share of the wealth generated from the Project and preferential access to jobs, training and business opportunities.	GCT will continue discussions on Indigenous training, jobs and business opportunities for the construction and operation of the Project	Section 8.4.4 First Nations of the Maa-nulth Treaty Society Section 8.7 Summary of Planned Engagement Activities and Opportunities to Work Together
15	First Nations of the Maa-nulth Treaty Society	The Project must recognize, thoroughly assess its impacts on and not unjustifiably infringe Aboriginal and/or Treaty Rights, including resource harvesting and IK practices	GCT will engage with the First Nations of the Maa-Nulth Treaty Society to understand their Aboriginal and/or Treaty rights and title within the Impact Assessment process.	Section 8.4.4 First Nations of the Maa-nulth Treaty Society Section 8.7 Summary of Planned Engagement Activities and Opportunities to Work Together
16	First Nations of the Maa-nulth Treaty Society	Concerned about effects from invasive species being brought to the area from ships, either on hulls or in ballast water.	GCT will engage with the First Nations of the Maa-Nulth Treaty Society to determine how best to address this concern in the assessment process.	Section 8.4.4 First Nations of the Maa-nulth Treaty Society Section 8.7 Summary of Planned Engagement Activities and Opportunities to Work Together
17	First Nations of the Maa-nulth Treaty Society	The overall health of the Ocean and its resources	GCT encourages the First Nations of the Maa-Nulth Treaty Society to work with the Government of Canada on their Oceans Protection Plan which is intended to create a "shared approach to better understand coastal ecosystems and the possible effects that ships have on the environment".	Section 8.4.4 First Nations of the Maa-nulth Treaty Society
18	First Nations of the Maa-nulth Treaty Society	Impacts to treaty rights extend beyond the 12 nautical mile limit as the Domestic Fishing Area extends beyond it. As a result, the scope of assessment should extend to a 200-mile nautical limit.	The determination of the scope of the Impact Assessment will be part of the preparation of the joint provincial Application Information Requirements (AIR) and federal Tailored Impact Statement Guidelines (TISG), also referred to as the Joint Guidelines. GCT continues to engage with Indigenous nations to provide information on the spatial scope of the assessment including factors to be considered. The spatial scope will ultimately be determined by the IAAC and the BCEAO.	Section 8.4.4 First Nations of the Maa-nulth Treaty Society
19	Sc'ianew First Nation	Effects of the Project on the environment, including cumulative effects, must be thoroughly assessed.	Section 7.11 of the DPD commits that "a cumulative effects assessment will be completed that considers the potential for residual effects of the Project on specific valued components (e.g., environmental, social, economic), combined with the effects of other past, current or reasonably foreseeable projects that overlap with the Project study areas." The projects and developments for inclusion in the cumulative effects assessment related to Valued Components (VCs) are typically determined by regulators, with input from groups such as Indigenous nations and stakeholders. GCT appreciates this feedback on the scope of the cumulative effects assessment for regulators' consideration. A cumulative effects assessment is also a part of the assessment of effects to Indigenous Interests. In addition, to work on cumulative effects assessment through the Project Assessment, GCT will work with the Indigenous Nation and government on initiatives such as the Government of Canada's Ocean Protection Plan. Section 6.1 of the DPD also states that "GCT has established a CAD 200,000 fund to support Indigenous-led initiatives aimed at increasing both participation and collaboration in the cumulative-effects assessment of the south Salish Sea off BC's coast. The funding initiative is not specific to the DP4 Project but may inform the assessments of projects in the area." Participating Indigenous nations can bring forward proposals for other areas to be included, such as the Fraser River.	Section 8.4.19 Sc'ianew First Nation  Section 7.11 Potential Cumulative Effects
20	Sc'ianew First Nation	Effective monitoring throughout life of Project required.	GCT will work with Sc'ianew First Nation and government agencies to ensure that appropriate monitoring is completed in the Project assessment. Monitoring is a common condition of project approvals and will likely be required by federal and provincial regulators.	Section 8.4.19 Sc'ianew First Nation Section 8.7 Summary of Planned Engagement Activities and Opportunities to Work Together
21	Sc'ianew First Nation	Negative impacts must be avoided or mitigated to the greatest extent possible; rehabilitation required where harm is done	GCT's Impact Assessment for a joint Environmental Assessment Certificate and Decision Statement will provide a comprehensive and robust assessment of potential adverse effects of the Project, including mitigation and assessment of residual effects. Tables 15 and 16 in the DPD outline potential effects from the Project and identifies potential mitigation measures and off-sets.  GCT will continue to work with Indigenous nations to determine if there are other potential effects and to assess how they may be avoided or mitigated.	Section 8.4.19 Sc'ianew First Nation Table 15 Potential Effects in Relation to Impact Assessment Requirements Table 16 Other Potential Effects of the Project

**TABLE C1: RESPONSES TO ISSUES AND INDIGENOUS INTERESTS RAISED IN THE JOINT SUMMARY OF ISSUES AND ENGAGEMENT.**

Number	Indigenous Nation	Summarized Understanding of Issues and Interests Raised in the JSOIE	GCT's Response	Reference in the DPD
22	Sc'ianew First Nation	Compensation required for any cultural interference or loss suffered as a result of the harm caused by Project.	GCT will work with Indigenous nations to avoid potential cultural interference or loss associated with the Project. Where potential interactions occur between the Project and culture, GCT will work with Indigenous nations to develop and apply mitigation measures.	N/A
23	Sc'ianew First Nation	Nations must receive a share of the wealth generated from the Project and preferential access to jobs, training and business opportunities.	GCT will continue discussions on Indigenous training, jobs and business opportunities for the construction and operation of the Project	Section 8.4.19 Sc'ianew First Nation Section 8.7 Summary of Planned Engagement Activities and Opportunities to Work Together
24	Sc'ianew First Nation	The Project must recognize, thoroughly assess its impacts on and not unjustifiably infringe Aboriginal and/or Treaty Rights, including resource harvesting and IK practices	GCT will engage with Sc'ianew First Nation to understand their Aboriginal and/or Treaty rights and title within the Impact Assessment process.	Section 8.4.19 Sc'ianew First Nation Section 8.7 Summary of Planned Engagement Activities and Opportunities to Work Together
25	Sc'ianew First Nation	Concerned about effects from invasive species being brought to the area from ships, either on hulls or in ballast water.	GCT will engage with Sc'ianew First Nation to determine how best to address this concern in the assessment process.	Section 8.4.19 Sc'ianew First Nation Section 8.7 Summary of Planned Engagement Activities and Opportunities to Work Together
26	Sc'ianew First Nation	The overall health of the Ocean and its resources	GCT support the protection of our oceans and its resources and is committed to avoiding, mitigation and compensating for potential impacts associated with DP4, which will be thoroughly assessed through the federal and provincial Impact Assessment processes and if approved, subsequent permitting requirements.	Section 8.4.19 Sc'ianew First Nation
27	Sc'ianew First Nation	Impacts to treaty rights extend beyond the 12 nautical mile limit as the Domestic Fishing Area extends beyond it. As a result, the scope of assessment should extend to a 200-mile nautical limit.	The determination of the scope of the Impact Assessment will be part of the preparation of the joint provincial Application Information Requirements (AIR) and federal Tailored Impact Statement Guidelines (TISG), also referred to as the Joint Guidelines. GCT continues to engage with Indigenous nations to provide information on the spatial scope of the assessment including factors to be considered. The spatial scope will ultimately be determined by the IAAC and the BCEAO.	Section 8.4.19 Sc'ianew First Nation
28	Esquimalt Nation	Effects of the Project on the environment, including cumulative effects, must be thoroughly assessed.	Section 7.11 of the DPD commits that "a cumulative effects assessment will be completed that considers the potential for residual effects of the Project on specific valued components (e.g., environmental, social, economic), combined with the effects of other past, current or reasonably foreseeable projects that overlap with the Project study areas." The projects and developments for inclusion in the cumulative effects assessment related to Valued Components (VCs) are typically determined by regulators, with input from groups such as Indigenous nations and stakeholders. GCT appreciates this feedback on the scope of the cumulative effects assessment for regulators' consideration. A cumulative effects assessment is also a part of the assessment of effects to Indigenous Interests. In addition, to work on cumulative effects assessment through the Project Assessment, GCT will work with the Indigenous Nation and government on initiatives such as the Government of Canada's Ocean Protection Plan. Section 6.1 of the DPD also states that "GCT has established a CAD 200,000 fund to support Indigenous-led initiatives aimed at increasing both participation and collaboration in the cumulative-effects assessment of the south Salish Sea off BC's coast. The funding initiative is not specific to the DP4 Project but may inform the assessments of projects in the area." Participating Indigenous nations can bring forward proposals for other areas to be included, such as the Fraser River.	Section 8.4.3 Esquimalt Nation Section 7.11 Potential Cumulative Effects
29	Esquimalt Nation	Effective monitoring throughout life of Project required.	GCT will work with Esquimalt Nation and government agencies to ensure that appropriate monitoring is completed in the Project assessment. Monitoring is a common condition of project approvals and will likely be required by federal and provincial regulators.	Section 8.4.3 Esquimalt Nation Section 8.7 Summary of Planned Engagement Activities and Opportunities to Work Together
30	Esquimalt Nation	Negative impacts must be avoided or mitigated to the greatest extent possible; rehabilitation required where harm is done	GCT's Impact Assessment for an joint Environmental Assessment Certificate and Decision Statement will provide a comprehensive and robust assessment of potential adverse effects of the Project, including mitigation and assessment of residual effects. Tables 15 and 16 in the DPD outline potential effects from the	Section 8.4.3 Esquimalt Nation Table 15 Potential Effects in Relation to Impact Assessment Requirements Table 16 Other Potential Effects of the Project

**TABLE C1: RESPONSES TO ISSUES AND INDIGENOUS INTERESTS RAISED IN THE JOINT SUMMARY OF ISSUES AND ENGAGEMENT.**



Number	Indigenous Nation	Summarized Understanding of Issues and Interests Raised in the JSOIE	GCT's Response	Reference in the DPD
			Project and identifies potential mitigation measures and off-sets. GCT will continue to work with Indigenous nations to determine if there are other potential effects and to assess how they may be avoided or mitigated.	
31	Esquimalt Nation	Compensation required for any cultural interference or loss suffered as a result of the harm caused by Project.	GCT will work with Indigenous nations to avoid potential cultural interference or loss associated with the Project. Where potential interactions occur between the Project and culture, GCT will work with Indigenous nations to develop and apply mitigation measures.	Section 8.4.3 Esquimalt Nation Nation
32	Esquimalt Nation	Nations must receive a share of the wealth generated from the Project and preferential access to jobs, training and business opportunities.	GCT will continue discussions on Indigenous training, jobs and business opportunities for the construction and operation of the Project	Section 8.4.3 Esquimalt Nation Section 8.7 Summary of Planned Engagement Activities and Opportunities to Work Together
33	Esquimalt Nation	The Project must recognize, thoroughly assess its impacts on and not unjustifiably infringe Aboriginal and/or Treaty Rights, including resource harvesting and IK practices	GCT will engage with Esquimalt Nation to understand their Aboriginal and/or Treaty rights and title within the Impact Assessment process.	Section 8.4.3 Esquimalt Nation Section 8.7 Summary of Planned Engagement Activities and Opportunities to Work Together
34	Esquimalt Nation	Concerned about effects from invasive species being brought to the area from ships, either on hulls or in ballast water.	GCT will engage with Esquimalt Nation to determine if issues associated with the introduction of invasive species can be addressed through the DP4 Impact Assessment or other regulatory requirements that address the issue.	Section 8.4.3 Esquimalt Nation Section 8.7 Summary of Planned Engagement Activities and Opportunities to Work Together
35	Esquimalt Nation	The overall health of the Ocean and its resources	GCT encourages Esquimalt Nation to work with the Government of Canada on their Oceans Protection Plan which is intended to create a "shared approach to better understand coastal ecosystems and the possible effects that ships have on the environment".	Section 8.4.3 Esquimalt Nation
36	Esquimalt Nation	Impacts to treaty rights extend beyond the 12 nautical mile limit as the Domestic Fishing Area extends beyond it. As a result, the scope of assessment should extend to a 200-mile nautical limit.	The determination of the scope of the Impact Assessment will be part of the preparation of the joint provincial Application Information Requirements (AIR) and federal Tailored Impact Statement Guidelines (TISG), also referred to as the Joint Guidelines. GCT continues to engage with Indigenous nations to provide information on the spatial scope of the assessment including factors to be considered. The spatial scope will ultimately be determined by the IAAC and the BCEAO.	Section 8.4.3 Esquimalt Nation
37	Pauquachin First Nation	Effects of the Project on the environment, including cumulative effects, must be thoroughly assessed.	Section 7.11 of the DPD commits that "a cumulative effects assessment will be completed that considers the potential for residual effects of the Project on specific valued components (e.g., environmental, social, economic), combined with the effects of other past, current or reasonably foreseeable projects that overlap with the Project study areas." The projects and developments for inclusion in the cumulative effects assessment related to Valued Components (VCs) are typically determined by regulators, with input from groups such as Indigenous nations and stakeholders. GCT appreciates this feedback on the scope of the cumulative effects assessment for regulators' consideration. A cumulative effects assessment is also a part of the assessment of effects to Indigenous Interests. In addition, to work on cumulative effects assessment through the Project Assessment, GCT will work with the Indigenous Nation and government on initiatives such as the Government of Canada's Ocean Protection Plan. Section 6.1 of the DPD also states that "GCT has established a CAD 200,000 fund to support Indigenous-led initiatives aimed at increasing both participation and collaboration in the cumulative-effects assessment of the south Salish Sea off BC's coast. The funding initiative is not specific to the DP4 Project but may inform the assessments of projects in the area." Participating Indigenous nations can bring forward proposals for other areas to be included, such as the Fraser River.	Section 8.4.16 Pauquachin First Nation Section 7.11 Potential Cumulative Effects
38	Pauquachin First Nation	Effective monitoring throughout life of Project required.	GCT will work with Pauquachin First Nation and government agencies to ensure that appropriate monitoring is completed in the Project assessment. Monitoring is a common condition of project approvals and will likely be required by federal and provincial regulators.	Section 8.4.16 Pauquachin First Nation Section 8.7 Summary of Planned Engagement Activities and Opportunities to Work Together

**TABLE C1: RESPONSES TO ISSUES AND INDIGENOUS INTERESTS RAISED IN THE JOINT SUMMARY OF ISSUES AND ENGAGEMENT.**

Number	Indigenous Nation	Summarized Understanding of Issues and Interests Raised in the JSOIE	GCT's Response	Reference in the DPD
39	Pauquachin First Nation	Negative impacts must be avoided or mitigated to the greatest extent possible; rehabilitation required where harm is done	GCTs Impact Assessment for a joint Environmental Assessment Certificate and Decision Statement will provide a comprehensive and robust assessment of potential adverse effects of the Project, including mitigation and assessment of residual effects. Tables 15 and 16 in the DPD outline potential effects from the Project and identifies potential mitigation measures and off-sets. GCT will continue to work with Indigenous nations to determine if there are other potential effects and to assess how they may be avoided or mitigated.	Section 8.4.16 Pauquachin First Nation Table 15 Potential Effects in Relation to Impact Assessment Requirements Table 16 Other Potential Effects of the Project
40	Pauquachin First Nation	Compensation required for any cultural interference or loss suffered as a result of the harm caused by Project.	GCT will work with Indigenous nations to avoid potential cultural interference or loss associated with the Project. Where potential interactions occur between the Project and culture, GCT will work with Indigenous nations to develop and apply mitigation measures.	Section 8.4.16 Pauquachin First Nation
41	Pauquachin First Nation	Nations must receive a share of the wealth generated from the Project and preferential access to jobs, training and business opportunities.	GCT will continue discussions on Indigenous training, jobs and business opportunities for the construction and operation of the Project	Section 8.4.16 Pauquachin First Nation Section 8.7 Summary of Planned Engagement Activities and Opportunities to Work Together
42	Pauquachin First Nation	The Project must recognize, thoroughly assess its impacts on and not unjustifiably infringe Aboriginal and/or Treaty Rights, including resource harvesting and IK practices	GCT will engage with Pauquachin First Nation to understand their Aboriginal and/or Treaty rights and title within the Impact Assessment process.	Section 8.4.16 Pauquachin First Nation Section 8.7 Summary of Planned Engagement Activities and Opportunities to Work Together
43	Pauquachin First Nation	Concerned about effects from invasive species being brought to the area from ships, either on hulls or in ballast water.	GCT will engage with Pauquachin First Nation to determine how best to address this concern in the assessment process.	Section 8.4.16 Pauquachin First Nation Section 8.7 Summary of Planned Engagement Activities and Opportunities to Work Together
44	Pauquachin First Nation	The overall health of the Ocean and its resources	GCT encourages Pauquachin First Nation to work with the Government of Canada on their Oceans Protection Plan which is intended to create a “shared approach to better understand coastal ecosystems and the possible effects that ships have on the environment”.	Section 8.4.16 Pauquachin First Nation
45	Pauquachin First Nation	Impacts to treaty rights extend beyond the 12 nautical mile limit as the Domestic Fishing Area extends beyond it. As a result, the scope of assessment should extend to a 200-mile nautical limit.	The determination of the scope of the Impact Assessment will be part of the preparation of the joint provincial Application Information Requirements (AIR) and federal Tailored Impact Statement Guidelines (TISG), also referred to as the Joint Guidelines. GCT continues to engage with Indigenous nations to provide information on the spatial scope of the assessment including factors to be considered. The spatial scope will ultimately be determined by the IAAC and the BCEAO.	Section 8.4.16 Pauquachin First Nation
46	Malahat Nation	Marine shipping may adversely impact Malahat’s Aboriginal rights and its ability to exercise its Douglas Treaty rights in relation to fishing and marine resource harvesting.	Malahat Nation is a participant in the Coordination Committee – Ship Movement and Vessel Management. GCT will continue to engage with Malahat Nation to understand the issues and steps that can be taken to address this matter, including how issues associated with fishing and marine resource harvesting may be included in the Project assessment.	Section 8.4.11 Malahat Nation, Section 7.8 GCT’s Preliminary Understanding of Potential Effects on Indigenous Interest from Project Activities
47	Malahat Nation	Marine shipping introduces safety concerns for Malahat’s ability to continue cultural traditions, connect with places of significance, transmit intergenerational knowledge and maintain connections.	Malahat Nation is a participant in the Coordination Committee – Ship Movement and Vessel Management. GCT will continue to engage with Malahat Nation to understand the issues and steps that may be taken to address matters associated with the safety of marine shipping and impacts on cultural traditions.	Section 8.4.11 Malahat Nation, Section 7.8 GCT’s Preliminary Understanding of Potential Effects on Indigenous Interest from Project Activities
48	Malahat Nation	Malahat Nation has stewardship responsibilities to marine species and has interests in food harvesting for a wide range of species. Without continued and reliable access to these, Malahat is likely to experience negative health consequences and a loss of cultural identity.	GCT has discussed this matter with Malahat Nation and has asked them to advise on studies that can be done to address food harvesting, health and cultural issues. Indigenous knowledge will be included in the Project assessment.	Section 8.4.11 Malahat Nation, Section 7.8 GCT’s Preliminary Understanding of Potential Effects on Indigenous Interest from Project Activities Section 8.7 Summary of Planned Engagement Activities and Opportunities to Work Together
49	Malahat Nation	Request funding for the capacity to carry out a territory-wide Indigenous Knowledge, Use and Occupancy study to engage in assessment processes with a fuller understanding of potential impacts and how these can be effectively minimized.	GCT has discussed this matter with Malahat Nation and is open to considering their request to address gaps in existing studies that have been conducted.	Section 8.4.11 Malahat Nation, Section 8.7 Summary of Planned Engagement Activities and Opportunities to Work Together

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Number	Indigenous Nation	Summarized Understanding of Issues and Interests Raised in the JSOIE	GCT's Response	Reference in the DPD
50	Malahat Nation	Food fish distribution is an important and much-celebrated component of community events as it provides important sustenance to elders and other community members.	GCT has discussed this matter with Malahat Nation and has asked them to advise on studies that can be done to address fisheries issues. The Impact Assessment will evaluate the potential effects of the Project on Indigenous Interests such as fishing. GCT looks forward to further collaboration with Malahat Nation in this regard.	Section 8.4.11 Malahat Nation, Section 7.8 GCT's Preliminary Understanding of Potential Effects on Indigenous Interest from Project Activities
51	Malahat Nation	Marine fisheries provide economic opportunity since Malahat holds commercial licenses for, or economic interests in, the harvesting of a number of species.	GCT has discussed this matter with Malahat Nation and has asked them to advise on studies that can be done to address fisheries issues. The Impact Assessment will evaluate the potential effects of the Project on Indigenous Interests such as fishing. GCT looks forward to further collaboration with Malahat Nation in this regard. Effects on fish, fishing, and employment are also likely topics for inclusion in the Project's assessment of potential effects to Valued Components, in addition to the assessment of effects to Indigenous Interests.	Section 8.4.11 Malahat Nation, Section 7.8 GCT's Preliminary Understanding of Potential Effects on Indigenous Interest from Project Activities, Section 8.7 Summary of Planned Engagement Activities and Opportunities to Work Together
52	Musqueam Indian Band	Musqueam holds a constitutionally protected right to harvest fish to meet its food, social and ceremonial needs that is consistently being impacted by the industrialization and development of the Fraser River, and could be further impacted by the Project.	GCT recognizes and respects Musqueam's Indigenous rights as defined in the Sparrow decision. The Impact Assessment will evaluate potential effects on Musqueam's interests which include rights to harvest fish. GCT will continue to engage with Musqueam on this concern and look forward to arranging further meetings to address this issue.	Section 8.4.14 Musqueam Indian Band Section 7.8 GCT's Preliminary Understanding of Potential Effects on Indigenous Interest from Project Activities, Section 8.7 Summary of Planned Engagement Activities and Opportunities to Work Together
53	Musqueam Indian Band	If changes lead to gaps in knowledge, effects may persist over generations	GCT would appreciate the opportunity to work with Musqueam to understand how Project interactions or effects have the potential to create gaps in knowledge, and with that, potential intergenerational effects. This topic will be considered as part of the Assessment of Indigenous Interests in the Impact Assessment. Where knowledge gaps related to Indigenous Interests have the potential to emerge as a result of the Project, GCT will engage with Musqueam on potential ways to avoid these effects. If effects cannot be avoided entirely, GCT will engage with Musqueam to develop mitigation or management measures related to knowledge gaps.	Section 8.4.14 Musqueam Indian Band Section 7.8 GCT's Preliminary Understanding of Potential Effects on Indigenous Interest from Project Activities, Section 8.7 Summary of Planned Engagement Activities and Opportunities to Work Together
54	Musqueam Indian Band	A loss of fish or access to fish resources in one season can lead to economic impacts for Musqueam fishers who rely on the resource for economic wellbeing.	GCT acknowledges the particular importance of fish to Musqueam and is committed to further engagement to better understand concerns related to loss and access to fish resources and related economic impacts. The Impact Assessment will evaluate the potential effects of the Project on Indigenous Interests such as fishing. GCT looks forward to further collaboration with Musqueam in this regard.	Section 8.4.14 Musqueam Indian Band, Section 7.8 GCT's Preliminary Understanding of Potential Effects on Indigenous Interest from Project Activities, Section 8.7 Summary of Planned Engagement Activities and Opportunities to Work Together
55	Musqueam Indian Band	The Project area is a historical and contemporary preferred fishing area which cannot be substituted with a location elsewhere.	GCT acknowledges the Project area as historical and an important fishing area for Musqueam. The Impact Assessment will evaluate the potential effects of the Project on Indigenous Interests such as fishing areas. It is anticipated that additional permitting required for the Project under the <i>Fisheries Act</i> may require habitat offsetting, with the preference for local offsets which GCT is in the process of investigating. GCT looks forward to further collaboration with Musqueam in this regard.	Section 8.4.14 Musqueam Indian Band, Section 7.8 GCT's Preliminary Understanding of Potential Effects on Indigenous Interest from Project Activities, Section 8.7 Summary of Planned Engagement Activities and Opportunities to Work Together
56	Musqueam Indian Band	The Project footprint overlaps with an important crab harvesting area that is already being threatened by development. Any further development could lead to significant adverse impacts.	GCT recognizes that the crab fishery is one of the key food harvesting opportunities in the region. The Impact Assessment will evaluate the potential effects on Indigenous Interests such as crab harvesting and will identify appropriate mitigation measures based on Project effects. GCT will work with Musqueam to better understand potential impacts on crab harvesting that may result from the Project.	Section 8.4.14 Musqueam Indian Band, Section 7.8 GCT's Preliminary Understanding of Potential Effects on Indigenous Interest from Project Activities, Section 8.7 Summary of Planned Engagement Activities and Opportunities to Work Together
57	Musqueam Indian Band	Any increase in shipping in the vicinity of the Project area can have significant adverse impacts to Musqueam proven fishing rights and ability to safely traverse the water in the area.	GCT acknowledges the potential impacts of increased shipping in the South Salish Sea and the importance of the area to Musqueam's fishing rights and marine safety. The Impact Assessment will evaluate the potential effects of the Project on Indigenous Interests such as fishing. Marine use will also be considered in the assessment.	Section 8.4.14 Musqueam Indian Band, Section 7.8 GCT's Preliminary Understanding of Potential Effects on Indigenous Interest from Project Activities, Section 8.7 Summary of Planned Engagement Activities and Opportunities to Work Together
58	Musqueam Indian Band	There are potential Project interactions with the Musqueam Sense of Place and Identity	GCT commits to engaging with Musqueam to better understand their sense of place and identity. This topic will be considered as part of the Assessment of Indigenous Interests in the Project assessment. Where effects to Musqueam Sense of Place and	Section 8.4.14 Musqueam Indian Band, Section 7.8 GCT's Preliminary Understanding of Potential Effects

**TABLE C1: RESPONSES TO ISSUES AND INDIGENOUS INTERESTS RAISED IN THE JOINT SUMMARY OF ISSUES AND ENGAGEMENT.**

Number	Indigenous Nation	Summarized Understanding of Issues and Interests Raised in the JSOIE	GCT's Response	Reference in the DPD
			Identity have the potential to emerge as a result of the Project, GCT will engage with Musqueam on potential ways to avoid these effects. If effects cannot be avoided entirely, GCT will engage with Musqueam to develop mitigation or management measures related to Musqueam Sense of Place and Identity.	on Indigenous Interest from Project Activities, Section 8.7 Summary of Planned Engagement Activities and Opportunities to Work Together
59	Musqueam Indian Band	Despite ongoing industrial development of the area, the potential for Musqueam cultural heritage sites at DeltaPort is still high due to its location in historical and current fishing routes.	GCT will work with Musqueam to better understand the potential for disturbance of cultural heritage sites at Deltaport, and ways in which any impacts would be avoided or managed.	Section 8.4.14 Musqueam Indian Band, Section 7.8 GCT's Preliminary Understanding of Potential Effects on Indigenous Interest from Project Activities, Section 8.7 Summary of Planned Engagement Activities and Opportunities to Work Together
60	Musqueam Indian Band	Increased disruption to the protection, persistence, and living of Musqueam sɣʷəhim (i.e., ways, manners, and customs) and snəweyəl (i.e., teachings received since childhood, including identity and responsibilities) as a result of Project construction and operations.	GCT commits to engaging with Musqueam to better understand the meaning of sɣʷəhim and snəweyəl and how these values may be impacted by the Project. Potential Project effects to sɣʷəhim and snəweyəl will be considered in the assessment of Indigenous Interests.	Section 8.4.14 Musqueam Indian Band, Section 7.8 GCT's Preliminary Understanding of Potential Effects on Indigenous Interest from Project Activities, Section 8.7 Summary of Planned Engagement Activities and Opportunities to Work Together
61	Pacheedaht First Nation	Will be directly impacted by the Project as the shipping lanes go through Pacheedaht First Nation's Marine territory. As a result, significant potential to impact Pacheedaht First Nation's ability to exercise its Aboriginal title and rights.	GCT will work with Pacheedaht First Nation to understand this issue and steps that can be taken to address this matter. GCT also encourages Pacheedaht First Nation to work with the Government of Canada on their Oceans Protection Plan which is intended to create a "shared approach to better understand coastal ecosystems and the possible effects that ships have on the environment."	Section 8.4.15 Pacheedaht First Nation, Section 8.7 Summary of Planned Engagement Activities and Opportunities to Work Together
62	Pacheedaht First Nation	Being able to govern, and safely access, the Marine Territory and Swiftsure Bank is central to who Pacheedaht are as a people.	GCT will work with Pacheedaht First Nation and relevant governments to understand this issue and steps that can be taken to address this matter.	Section 8.4.15 Pacheedaht First Nation, Section 8.7 Summary of Planned Engagement Activities and Opportunities to Work Together
63	Pacheedaht First Nation	Concerns about avoidance of the marine territory by Pacheedaht members due to concerns about collisions, habitat contamination, contamination of resources and discharges and spills.	Issues associated with marine vessel collisions, habitat contamination, contamination of resources and discharges and spills are required factors that must be considered under federal and provincial assessment requirements. GCT will work with Pacheedaht First Nation and regulators to determine safety measures and mitigation that may be required to address these issues and allow Pacheedaht First Nation to safely use these areas.	Section 7 Potential Effects of the Project, Section 8.4.15 Pacheedaht First Nation Section 8.7 Summary of Planned Engagement Activities and Opportunities to Work Together
64	Pacheedaht First Nation	Due to the presence of the international shipping lanes through Swiftsure Bank and the core of Pacheedaht First Nation's Marine Territory, the project has the potential to significantly impact Pacheedaht First Nation's ability to exercise its Aboriginal title and rights, including governance rights, culture, and diet.	GCT will work with Pacheedaht First Nation and the Government of Canada to understand this issue and steps that can be taken to address the concerns. GCT also encourages Pacheedaht First Nation to work with the Government of Canada on their Oceans Protection Plan as a forum for potentially addressing issues related to shipping and Indigenous use.	Section 8.4.15 Pacheedaht First Nation Section 8.7 Summary of Planned Engagement Activities and Opportunities to Work Together
65	Pacheedaht First Nation	Disruption to the sense of quiet that is required for harvesting that supports spiritual connection to the marine territory.	GCT would like the opportunity to further discuss this issue to better understand the spiritual connection to the marine territory. GCT also encourages Pacheedaht First Nation to work with the Government of Canada on their Oceans Protection Plan as a forum for potentially addressing issues related to shipping and Indigenous use.	Section 8.4.15 Pacheedaht First Nation Section 8.7 Summary of Planned Engagement Activities and Opportunities to Work Together
66	S'ólh Téméxw Stewardship Alliance	Cumulative effects of the Project in consideration of all the other projects taking place within S'ólh Téméxw (Stó:ló traditional territory) and along the Fraser River.	Section 7.11 of the DPD commits that "a cumulative effects assessment will be completed that considers the potential for residual effects of the Project on specific valued components (e.g., environmental, social, economic), combined with the effects of other past, current or reasonably foreseeable projects that overlap with the Project study areas." The projects and developments for inclusion in the cumulative effects assessment related to Valued Components (VCs) are typically determined by regulators, with input from groups such as Indigenous nations and stakeholders. GCT appreciates this feedback on the scope of the cumulative effects assessment for regulators' consideration. A cumulative effects assessment is also a part of the assessment of effects to Indigenous Interests. In addition, to work on cumulative effects assessment through the Impact Assessment, GCT will work with the Indigenous Nation and government on initiatives such as the Government of	Section 7.11 Potential Cumulative Effects, Section 8.4.23 S'ólh Téméxw Stewardship Alliance Section 8.7 Summary of Planned Engagement Activities and Opportunities to Work Together

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Number	Indigenous Nation	Summarized Understanding of Issues and Interests Raised in the JSOIE	GCT's Response	Reference in the DPD
			Canada's Ocean Protection Plan. Section 6.1 of the DPD also states that "GCT has established a CAD 200,000 fund to support Indigenous-led initiatives aimed at increasing both participation and collaboration in the cumulative-effects assessment of the south Salish Sea off BC's coast. The funding initiative is not specific to the DP4 Project but may inform the assessments of projects in the area." Participating Indigenous nations can bring forward proposals for other areas to be included, such as the Fraser River.	
67	S'ólh Téméxw Stewardship Alliance	Confusion regarding the status of the Project in that initially the S'ólh Téméxw Stewardship Alliance was told by the Vancouver Fraser Port Authority that the Project was not moving forward.	GCT has had discussions with S'ólh Téméxw Stewardship and has asked for further information on this matter. The VFPA's administrative, permitting and other powers with respect to the DP4 Project, including those related to port operations, are currently the subject of judicial review."	Section 8.4.23 S'ólh Téméxw Stewardship Alliance
68	Tsawwassen First Nation	Project is likely to result in significant adverse effects to Tsawwassen First Nation Treaty rights and culture, including right to fish and harvest crab, migratory birds, wildlife and plants. Effects to species' habitats from the Project must be considered.	GCT is committed to continuing to engage with Tsawwassen First Nation to understand Tsawwassen First Nation Treaty, rights and culture. The Impact Assessment will evaluate effects on Indigenous Interests, including rights to harvest. GCT looks forward to further engagement with Tsawwassen First Nation on this important issue.	Section 8.4.30 Tsawwassen First Nation, Section 8.7 Summary of Planned Engagement Activities and Opportunities to Work Together
69	Tsawwassen First Nation	Decline in salmon deeply troubling as continued access to Fraser River salmon was a key goal in negotiating Tsawwassen First Nations treaty.	GCT acknowledges the particular importance of salmon to the Tsawwassen First Nation. The Impact Assessment will evaluate potential effects on Indigenous Interests including salmon. GCT looks forward to continuing to engage with Tsawwassen First Nation to better understand this concern.	Section 8.4.30 Tsawwassen First Nation, Section 8.7 Summary of Planned Engagement Activities and Opportunities to Work Together
70	Tsawwassen First Nation	Impacts to Tsawwassen First Nation's archaeological, paleontological, architectural, heritage and/or.	GCT will assess potential Project impacts on archaeological, paleontological, architectural, heritage and/or cultural interests as a requirement of the federal <i>Impact Assessment Act</i> . A similar assessment will also be required under the provincial <i>Environmental Assessment Act</i> to address potential impacts to culture and Indigenous Interests. GCT is committed to continuing to work with Tsawwassen First Nation to identify issues of cultural interest and opportunities to avoid sites of importance.	Section 7.7 Potential Effects on Heritage Resources, Section 8.4.30 Tsawwassen First Nation Section 8.7 Summary of Planned Engagement Activities and Opportunities to Work Together
71	Tsawwassen First Nation	Impacts to Tsawwassen First Nation's cultural interests	GCT will assess potential Project impacts on cultural interests as a requirement of the federal <i>Impact Assessment Act</i> . A similar assessment will also be required under the provincial <i>Environmental Assessment Act</i> to address potential impacts to culture and Indigenous Interests. GCT is committed to continuing to work with Tsawwassen First Nation to identify issues of cultural interest and opportunities to avoid sites of importance.	Section 7.7 Potential Effects on Heritage Resources, Section 8.4.30 Tsawwassen First Nation Section 8.7 Summary of Planned Engagement Activities and Opportunities to Work Together
72	Tsawwassen First Nation	Ability to access fishing and harvest areas and resulting adverse effects to food security.	GCT appreciates Tsawwassen First Nation's comment and acknowledges the importance of access to fishing and harvest areas as it relates to food security. The Impact Assessment will assess effects to Indigenous Interests, which include rights to fishing and harvesting. GCT looks forward to engaging with Tsawwassen First Nation on this issue.	Section 8.4.30 Tsawwassen First Nation Section 7.8 GCT's Preliminary Understanding of Potential Effects on Indigenous Interest from Project Activities, Section 8.7 Summary of Planned Engagement Activities and Opportunities to Work Together
73	Tsawwassen First Nation	Adverse impacts on Tsawwassen First Nation socio-economic indicators, including those arising from increased road and marine traffic, road closures, decreased land access, population growth and increased cost of living. Concern how the Project may interact with traditional Tsawwassen First Nation economies	GCT acknowledges the proximity of the Project to Tsawwassen First Nation. The Impact Assessment will evaluate potential social and economic effects, as in an assessment of effects to Indigenous Interests. GCT would like the opportunity to further discuss Tsawwassen First Nation's socio-economic indicators and concerns as well as traditional economies as the Impact Assessment process progresses.	Section 8.4.30 Tsawwassen First Nation Section 7.8 GCT's Preliminary Understanding of Potential Effects on Indigenous Interest from Project Activities, Section 8.7 Summary of Planned Engagement Activities and Opportunities to Work Together
74	Tsawwassen First Nation	Impacts to spiritual and culture wellbeing, including by affecting member's knowledge and language about their home	GCT appreciates this comment and would like the opportunity to engage with Tsawwassen First Nation more closely on this issue. Indigenous Knowledge will be considered within the Indigenous Interests portion of the Project assessment, where Indigenous nations are able to provide Indigenous Knowledge for inclusion	Section 8.4.30 Tsawwassen First Nation Section 8.7 Summary of Planned Engagement Activities and Opportunities to Work Together



**TABLE C1: RESPONSES TO ISSUES AND INDIGENOUS INTERESTS RAISED IN THE JOINT SUMMARY OF ISSUES AND ENGAGEMENT.**

Number	Indigenous Nation	Summarized Understanding of Issues and Interests Raised in the JSOIE	GCT's Response	Reference in the DPD
75	Tsawwassen First Nation	Impacts on human health, mental and social well-being	GCT appreciates this comment and will work with Tsawwassen First Nation. to better understand the current state of human and mental health and social well-being within the community, and potential Project effects.	Section 8.4.30 Tsawwassen First Nation, Section 7.6 Potential Effects on Human Health and Community Wellbeing, Section 8.7 Summary of Planned Engagement Activities and Opportunities to Work Together
76	Tsawwassen First Nation	Visual disturbance, as People Facing the Sea, from Project construction and operation and its impact on the health of the community.	As a long-term neighbour of Tsawwassen First Nation, GCT recognizes its proximity to the traditional village and the current residences of Tsawwassen First Nation. The topic of visual quality will be included in the Impact Assessment.	Section 8.3.30 Tsawwassen First Nation, Section 8.4.30 Tsawwassen First Nation, Section 7.6 Potential Effects on Human Health and Community Wellbeing
77	Tsawwassen First Nation	Negative effects to Southern Resident Killer Whale are unacceptable. The species holds social, cultural and ceremonial values to Tsawwassen First Nation members.	The protection and conservation of SRKW are important to GCT. Marine mammals including SRKW will be included in the Impact Assessment, and if the Project is approved, the Project will also require permitting under the <i>Species at Risk Act</i> . Indigenous Knowledge from Indigenous nations such as Tsawwassen First Nation will be incorporated into the assessment of potential effects, and GCT looks forward to further engagement with Tsawwassen First Nation on this issue as the Impact Assessment process progresses.	Section 8.4.30 Tsawwassen First Nation Section 7.2.1 Fish and fish Habitats and Aquatic Species, Section 8.7 Summary of Planned Engagement Activities and Opportunities to Work Together
78	Tsawwassen First Nation	Impacts to self-governance and stewardship will stand to undermine Tsawwassen First Nation laws.	GCT will take the time to fully understand the governance and stewardship structures of Tsawwassen First Nation and will continue to collaborate and engage with Tsawwassen First Nation on these issues.	Section 8.4.30 Tsawwassen First Nation Section 8.7 Summary of Planned Engagement Activities and Opportunities to Work Together
79	Tsawwassen First Nation	Consideration of whether the Project will advance the ongoing process of reconciliation with Canada and BC.	Advancing reconciliation with First Nations is one of the key factors that has led to the revitalization of the BC <i>Environmental Assessment Act</i> . The Government of Canada has also acknowledged that participation of Indigenous peoples in impact assessment aligns with their commitment to implement the United Nations Declaration on the Rights of Indigenous Peoples and supports the goal to secure free, prior and informed consent for decisions that affect Indigenous peoples' rights and interests. GCT will work with Federal and Provincial officials to understand how the Project may advance reconciliation with Tsawwassen First Nation and acknowledges Tsawwassen First Nation's ninth principle that "Assessments of impact to the exercise of Aboriginal and Treaty rights should consider a project's contribution to reconciliation."	Section 8.4.30 Tsawwassen First Nation
80	Tsleil-Waututh Nation	Existing cumulative environmental effects leading to the loss and degradation of biodiversity, traditional food species, and habitats in the Fraser River and Burrard Inlet are indicative of ongoing violations against ecological thresholds and Tsleil-Waututh Nation laws	Section 7.11 of the DPD commits that "a cumulative effects assessment will be completed that considers the potential for residual effects of the Project on specific valued components (e.g., environmental, social, economic), combined with the effects of other past, current or reasonably foreseeable projects that overlap with the Project study areas." The projects and developments for inclusion in the cumulative effects assessment related to Valued Components (VCs) are typically determined by regulators, with input from groups such as Indigenous nations and stakeholders. GCT appreciates this feedback on the scope of the cumulative effects assessment for regulators' consideration. A cumulative effects assessment is also a part of the assessment of effects to Indigenous Interests. In addition, to work on cumulative effects assessment through the Impact Assessment, GCT will work with the Indigenous Nation and government on initiatives such as the Government of Canada's Ocean Protection Plan. Section 6.1 of the DPD also states that "GCT has established a CAD 200,000 fund to support Indigenous-led initiatives aimed at increasing both participation and collaboration in the cumulative-effects assessment of the south Salish Sea off BC's coast. The funding initiative is not specific to the DP4 Project but may inform the assessments of projects in the area." Participating Indigenous nations can bring forward proposals for other areas to be included, such as the Fraser River.	Section 8.4.32 Tsleil-Waututh Nation Section 7.11 Potential Cumulative Effects

**TABLE C1: RESPONSES TO ISSUES AND INDIGENOUS INTERESTS RAISED IN THE JOINT SUMMARY OF ISSUES AND ENGAGEMENT.**

Number	Indigenous Nation	Summarized Understanding of Issues and Interests Raised in the JSOIE	GCT's Response	Reference in the DPD
81	Tsleil-Waututh Nation	Impacts on food sovereignty	GCT acknowledges the importance of food sovereignty for Indigenous peoples and is committed to further engagement on this issue.	Section 8.4.32 Tsleil-Waututh Nation Section 7.8 GCT's Preliminary Understanding of Potential Effects on Indigenous Interest from Project Activities, Section 8.8 Summary of Planned Engagement Activities and Opportunities to Work Together
82	Tsleil-Waututh Nation	Concern about impacts to community, culture, and teachings, which are tied to the well-being and survival of Southern Resident Killer Whales.	The protection and conservation of SRKW are important to GCT. Marine mammals, including SRKW, will be included in the Impact Assessment. If the Project is approved, the Project will also require permitting under the <i>Species at Risk Act</i> . Traditional knowledge from Indigenous nations such as Tsawwassen First Nation will be incorporated into the assessment of potential effects, and GCT looks forward to further engagement with Tsawwassen First Nation on this issue as the Impact Assessment process progresses.	Section 8.4.32 Tsleil-Waututh Nation Section 7.2.1 Fish and Fish Habitats and Aquatic species, Section 8.7 Summary of Planned Engagement Activities and Opportunities to Work Together
83	Tsleil-Waututh Nation	The Project falls within Tsleil-Waututh Nation's consultation area and is thus subject to the conditions of Tsleil-Waututh Nation's Stewardship Policy, which outlines laws and requirements for meaningful consultation.	GCT has taken the time to become acquainted with the Tsleil-Waututh Nation's Stewardship Policy. GCT will work with Tsleil-Waututh Nation and its members and staff to meet, as much as possible, the requirements of that policy. GCT commits to further engagement to better align Project outcomes with the Policy.	Section 8.4.32 Tsleil-Waututh Nation Section 8.7 Summary of Planned Engagement Activities and Opportunities to Work Together

**TABLE C2: SUMMARY OF ISSUES RAISED AS IDENTIFIED IN THE JOINT SUMMARY OF ISSUES AND ENGAGEMENT.**

Topic	Number	High-level Summary of Issue	GCT Response	Addressed in the DPD
Accidents and Malfunctions	1	Potential for adverse environmental and human health effects from accidents and malfunctions. This includes collisions, grounding, allision (the running of one ship upon another ship that is stationary), and/or spills during the operation of marine vessels, and hazardous material spills caused by train derailment, road and rail transport, and/or operation of land-based machinery	As identified in GCT's DPD, Section 7.9 and in accordance with both federal and provincial requirements, the Impact Assessment will include an assessment of potential accidents or malfunctions.  The scope of the Impact Assessment has yet to be confirmed, including the scope of factors associated with marine shipping and road and rail transport. The decision ultimately lies with federal and provincial regulators who will provide opportunities for members of the public, Indigenous nations and others to provide input via formal engagement to be carried out once it is determined that the Project is ready to formally enter the cooperative assessment process at the end of the early engagement/planning phase.	Section 7.9.2 Accident or Malfunction Scenarios
Accidents and Malfunctions	2	Effects of accidents and spills on the environment will differ off the continental shelf due to the presence of different environmental dynamics; the scope of the impact assessment must include this area	The scope of the Impact Assessment has yet to be confirmed, including the scope of factors associated with marine shipping. The decision ultimately lies with federal and provincial regulators who will provide opportunities for members of the public, Indigenous nations and others to provide input via formal engagement to be carried out once it is determined that the Project is ready to formally enter the cooperative assessment process at the end of the early engagement/planning phase.	N/A
Accidents and Malfunctions	3	Concern that the Project should not proceed until a proper risk analysis is conducted, and until there is a world class emergency response program and resources in place to deal with a major spill into the marine environment	As identified in GCT's DPD, Section 7.9 and in accordance with both federal and provincial requirements, the Impact Assessment will include an assessment of potential accidents or malfunctions.  Transport Canada has the authority over marine shipping in Canada under the <i>Canada Shipping Act, 2001</i> . Transport Canada works with other federal departments and agencies to fulfill their mandate and responsibilities. In BC, the main partners include the Canadian Coast Guard, the Pacific Pilotage Authority, Environment and Climate Change Canada and the VFPA. The Canadian Coast Guard is the lead federal agency responsible for ensuring an appropriate response to marine pollution incidents.	Section 7.9 Public and Environmental Safety
Accidents and Malfunctions	4	Details regarding the type of cargo being transported, to better tailor any required emergency response, as well as a list of applicable compensation regimes that apply in the event of different types of spills.	Although outside GCT's care and control, it is understood that Transport Canada has an internal division for Cargoes and Ship-Port Interface which is responsible for managing a variety of marine safety programs focused on safety-related aspects for marine carriage of all types of cargo, including containers.  Liability and compensation for spills are defined under the <i>Marine Liability Act</i> . Transport Canada, under the <i>Canada Shipping Act</i> and associated regulations and standards, manages the National Ship-Source Oil Spill Preparedness and Response Regime which is built on international and domestic cooperation. Liability and compensation for ship-source oil pollution in Canada are based on International Conventions developed by the International Maritime Organization, which makes sure the polluter pays.  If a vessel has an oil spill, the ship-owner would be liable for cleanup. The international marine community has adopted a number of conventions through the International Maritime Organization that govern ship-owner liability and international compensation funds. Applicable compensation regimes that would apply if there was a spill include the ship-owner's required insurance and limit of liability. Additional compensation may be paid by international funds financed by industry and distributed by the International Oil Pollution Compensation Funds in the case when the ship-owner is not liable, unable to meet their liability or the damage surpasses their limit of liability. If the costs of ship-sourced oil pollution were more than the amount of compensation available from the International conventions, Canada's Ship Source Oil Pollution Fund would help make sure all victims are compensated. In 2014, Canada also adopted amendments to the Marine Liability Act to address liability and compensation for incidents involving hazardous and noxious substances, which includes strict liability for the ship-owner with compulsory insurance and the creation of an international fund.  Under the Oceans Protection Plan, the Government of Canada is also working to make further improvements to the Ship Source Oil Pollution Fund regarding compensation to those affected by ship-source spills.	N/A

**TABLE C2: SUMMARY OF ISSUES RAISED AS IDENTIFIED IN THE JOINT SUMMARY OF ISSUES AND ENGAGEMENT.**

Topic	Number	High-level Summary of Issue	GCT Response	Addressed in the DPD
Accidents and Malfunctions	5	Question regarding who will be held financially and physically responsible for the cost of cleaning up a spill and seeking most detail on GCT's spill response plan	<p>Liability and compensation for ship-source oil pollution in Canada are based on International Conventions developed by the International Maritime Organization, which makes sure the polluter pays. Vessels that transit Canadian waters are required to have a shipboard oil pollution emergency plan, as well as arrangement with the "Western Canada Marine Response Corporation (WCMRC)" for physical clean-up of an oil spill. The WCMRC is certified by Transport Canada and provides 24-hour emergency response to oil spills. Vessels in Canadian waters must report oil spills immediately to the Canadian Coast Guards and polluters are responsible for and will be held financially responsible to pay for the spill clean-up. After the spill is cleaned up, the Government of Canada conducts enforcement investigations into the causes of the spill and works with the polluter and response partners to recover the cost of the clean-up.</p> <p>If a Vessel has an oil spill, the ship-owner would be liable for cleanup. If the costs of the spill are more than the shipowner's limit of liability, additional compensation could be paid by international funds financed by industry and distributed by the International Oil Pollution Compensation Funds. If the costs of ship-sourced oil pollution are more than the amount of compensation available from the international conventions, Canada's Ship-source Oil Pollution Fund can help make sure all victims are compensated.</p> <p>As identified in GCT's DPD, Section 7.9, in addition to GCT's Emergency Response Plan, GCT has contracts with Quantum Murray Environmental (Emergency Response) and with Western Canada Marine Response Corporation (Transport Canada's Certified Marine Spill Response Organization) for 24-hour response, mitigation and clean up in circumstances where there is potential for a hazardous spill or leak that occurs during operation. GCT's Emergency Response Plan includes terminal spill mitigation measures and response. The Spill Reporting Regulation of the <i>Environmental Management Act</i> requires that spills in excess of reportable quantities be reported to the Emergency Management of BC. GCT's Safety, Security and Environment Advisor, or delegate, is responsible for making this assessment and contacting appropriate authorities should a major spill happen on the dock.</p> <p>The DP4 Impact Assessment will describe the environmental management plans, including spill response plans, that will be developed for construction as well as any updates that will be made for operational management plans.</p>	Section 7.9 Public and Environmental Safety
Acoustic Environment	1	Effects due to noise causing disturbance to the local population. A noise assessment of the area, including sensitive receptors, should be conducted. The assessment should be in accordance with Health Canada's guidance to compare baseline, Project-sourced noise, and Project + baseline noise levels, and should include cumulative effects.	The Impact Assessment will include a noise assessment that will assess the effects of noise from the Project in accordance with Health Canada requirements and all other applicable requirements. The noise assessment will describe baseline conditions, identify sensitive noise receptors, present the project noise levels, baseline noise levels, and compare noise emissions from Project activities to relevant Health Canada criteria, provincial and federal Guidelines and municipal bylaws. A cumulative effects assessment and proposed mitigation measures will be included in the noise assessment. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines for the Project. A first draft of the Joint Guidelines will be prepared by GCT and then submitted to IAAC and BCEAO who will tailor the document and consult on it with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuance of the final Joint Guidelines.	Section 7 Potential Effects of the Project
Acoustic Environment	2	An analysis of local transportation options (short sea shipping and truck transportation) would permit an assessment of their positive and negative effects on noise.	The Impact Assessment will include a noise assessment which will consider all potential noise sources associated with Project activities, and potential cumulative effects. The factors to be considered (including short sea shipping and truck activities), and the scope of those factors, will be described in the Joint Guidelines for the Project. A first draft of the Joint Guidelines will be prepared by GCT and then submitted to IAAC and BCEAO who will tailor the document and consult on it with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuance of the final Joint Guidelines.	Section 3.4.4 Physical Activities Incidental to the Project, Section 3.9. Alternative Means of Carrying out the Project, Section 7.4 Emissions, Discharges and Waste
Acoustic Environment	3	Concerns regarding increased vessel noise and light pollution at Project site through Project development, implementation, and future increased port/facility uses.	The Impact Assessment will include noise and visual assessments that take into account the potential effects of various activities during all phases of the Project and will follow applicable assessment as per the Joint Guidelines.	Section 7.4 Emissions, Discharges and Waste
Alternative Means of Carrying Out the Project	1	Clarity as to the feasibility of expanding Deltaport seaward to use one berth of the adjacent coal terminal (Westshore) when that lease is up for renewal in 2026, as well as an assessment of costs versus benefits of this option.	Westshore operates the multi-user coal loading facility at Roberts Bank, B.C. which serves Canadian and U.S. shippers of metallurgical and thermal coal. The terminal began operating in 1970 and Westshore owns all of the facilities, upgrades and operating equipment at the terminal. Westshore recently completed their latest upgrades to the terminal which cost in excess of CAD 240 million and the terminal has a stated capacity of 33[KM1] mm tonnes. Westshore is a very strong and viable business that has handled an average of 30 mm tonnes per year between 2017-2019 and is projected to handle in excess of 25mm tonnes in 2021. Westshore has an existing property lease with the VFPA with the current lease to expire December 31, 2026, and, Westshore has five (5) renewal options that extend to the year 2066. GCT has met with Westshore previously to discuss any potential alternative options to the DP4 expansion Project on the Westshore leased lands. At that time, Westshore Management confirmed that Westshore is a very viable business, has invested millions of capital expenditures recently to grow their business and has existing contracts with customers and the VFPA. It was also concluded that the estimated cost to convert the existing Westshore Berth 1 and backup lands into container space was not feasible, not practical or prudent and would be cost-prohibitive compared to the proposed DP4 expansion Project.	Section 3.9 Alternative Means of Carrying Out the Project

**TABLE C2: SUMMARY OF ISSUES RAISED AS IDENTIFIED IN THE JOINT SUMMARY OF ISSUES AND ENGAGEMENT.**

Topic	Number	High-level Summary of Issue	GCT Response	Addressed in the DPD
Alternatives to the Project	1	Clarity and further detail as to why the Port of Prince Rupert was not considered as an alternative to the Project.	Prince Rupert's capacity expansion was considered in GCT's assessment of container terminal capacity and volume projections in Table 2 of the DPD, however, it is not considered a viable alternative to meet the need and purpose of DP4 for various reasons. The Prince Rupert Port Authority's (PRPA) September 2020 Land Use Plan discusses existing and potential future container capacity, by stating: "Existing annual container capacity at the Fairview Container terminal is 1.35mm TEU's. Long-term Fairview Container Terminal capacity is estimated at approximately 2.4 mm TEU's, with the next phase of expansion expected to be completed by 2022, increasing its annual capacity to 1.8 mm TEUs. Future expansion phases (beyond 1.8 mm TEU's) will be challenged by the ability to maintain full operational capacity during construction. The development of a new second container terminal on South Kaieen Island with a potential capacity of 2.5 mm TEUs was identified as the next possible stage in expanding port container terminal capacity. It is important to note the development of this project will require significant investigation and an Impact Assessment before an investment decision could be considered." The PRPA has stated that Fairview Terminals will not be expanded beyond 1.8 mm TEUs in 2022 and has not commenced, nor engaged the IAAC on the assessment of a potential second container terminal at South Kalen Island at this time. All major world container shipping lines call in the Port of Vancouver because of the supply chain's ability to efficiently and cost-effectively handle and distribute container traffic through to all of the major destinations in North American. In addition, Vancouver has a strong demand for imports because of the population base, therefore, making Vancouver a must port of call for all shipping lines. On average, 33% of all container imports coming into Vancouver are designated for the Greater Vancouver area and interior of B.C. Over 47% of all exports arriving in Vancouver come from within B.C. and are necessary for the shipping lines to have a balanced trade of moving containers by rail as their contracts with the railways stipulate this requirement. Failing to have a balanced trade of overall imports and exports in their contracts with the railways generally results in penalties to the shipping lines, which informs the decision-making process to determine what ports a shipping line will discharge and load at.	Section 1.3.2 Need for the Project and Rationale
Alternatives to the Project	2	Further assessment of alternatives required, including on whether lands at Fraser Surrey Docks could be re-purposed to provide for expanded container capacity.	GCT has reviewed all the potential alternatives to the Project and believes that the proposed expansion at Deltaport is the best alternative. As stated in the DPD, Section 3.8, GCT has reviewed analysis of government agencies and agrees that terminals on the Fraser River including DP World Fraser Surrey (previously referred to as Fraser Surrey Docks) have limited growth capacity as they cannot accommodate Post-Panamax and larger container vessels, because they cannot safely navigate the Fraser River. DP World Fraser Surrey is limited by the size of the container vessels that can navigate the George Massey Tunnel and also limited by the vessel turning radius in the river itself. The current deep-sea channel is designed to accommodate two-way ship traffic of vessels up to 270 metres in length, 32.3 meters in breadth, and 11.5 meters in draft (the vertical distance between the waterline and the bottom of the ship's hull). As a one-lane channel, the existing Fraser River channel can accommodate larger vessels as long as the draft remains at 11.5 metres or less and the length does not compromise the vessel's ability to safely navigate the river bends or turn round at its destination. GCT's understanding is that the maximum size container vessel allowed to navigate the Fraser River to DP World Fraser Surrey is approximately 5,000 TEUs with an overall length of 295m and a maximum draft of 11.5 metres. This is the main reason why today DP World Fraser Surrey only has 3 or 4 smaller container vessels calling weekly. DP World Fraser Surrey was recently sold in 2020 and the current owner is expected to continue to handle container, bulk and breakbulk cargoes at this facility from ships that fall within the restrictions of the Fraser River. In addition, GCT's analysis of existing and future ship sizes is noted in the DPD in Section 3.4.4 under table 6. Currently at Deltaport, of the 364 annual ship calls only about 6% of these ship calls could potentially navigate the Fraser River to DP World Fraser Surrey. The other 94% of the existing ships cannot navigate the Fraser River due to the size of the vessels. Under the proposed DP4 Project, ship sizes will only continue to increase in size due to the economy of scale. The "Analysis of capacity options on the West Coast of Canada", which was provided by Black Quay consultants in 2019, indicates that the 2035 ship fleet size serving Deltaport with the proposed expansion will be in the 10,000 to 17,000 TEU range. None of these ships would be able to navigate the Fraser River to DP World Fraser Surrey even if they could re-purpose lands to accommodate containers.	Section 1.3 Project Purpose, Need and Rationale
Alternatives to the Project	3	Clarity and further detail regarding the need for both Roberts Bank Terminal 2 Project (RBT2) and Deltaport Berth 4 Project (DP4), and how DP4 will consider RBT2 in its alternative assessment should RBT2 be approved.	Based on multiple independent studies, GCT's own operational and market experience, and taking into account existing, approved known container capacity expansion projects on the West Coast of Canada, 2.0M to 2.4M additional capacity will be required sometime in the 2030s. This finding is further supported by the publicly available Black Quay study which is referenced in Section 10 in the DPD. VFPA has previously stated their preference for the exclusion of GCT as a terminal operator for RBT2, thus that project cannot be considered as an alternative to DP4 Project for GCT, as per the definition within the Impact Assessment guidance and thus it will not be further considered in the alternatives assessment. RBT2 is considered within the rationale for the need for DP4, as per section 1.3.2 of the DPD. There are many unknowns associated with the proposed RBT2 project, such as the uncertainty associated with regulatory approvals, whether the VFPA is able to secure required financing and procurement for construction and thereafter a feasible business case to support terminal operator procurement to allow RBT2 to move forward. As such, it would be challenging to further consider RBT2 in the DP4 alternatives assessment. Based on our knowledge, research and experience, DP4 is the most technically feasible and financially viable way forward to build competitive container capacity for Canada. This is further illustrated in the CPCS study available here: <a href="https://www.ceaa-acee.gc.ca/050/evaluations/document/130300">https://www.ceaa-acee.gc.ca/050/evaluations/document/130300</a>	Section 1.3.2. Need for the Project and Rationale, Section 1.3.3 Project Benefits Section 3.8 Alternatives to the Project

**TABLE C2: SUMMARY OF ISSUES RAISED AS IDENTIFIED IN THE JOINT SUMMARY OF ISSUES AND ENGAGEMENT.**

Topic	Number	High-level Summary of Issue	GCT Response	Addressed in the DPD
Atmospheric Environment	1	Effects on air quality from the Project, resulting in impacts to sensitive ecosystem receptors, contamination of nearby land and waterbodies, and effects on plants, wildlife, fish and fish habitat, and human health	The Impact Assessment will assess the effects of air quality from the Project and how potential pathways of effects could impact other receptors such as, but not limited to, human health. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines for the Project. A first draft of the Joint Guidelines will be prepared by GCT and then submitted to IAAC and BCEAO who will tailor the document and consult on it with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuance of the final Joint Guidelines.	Section 7.4 Emissions, Discharges and Wastes
Atmospheric Environment	2	Use of the most stringent Canadian Ambient Air Quality Standards, B.C. Ambient Air Quality Objectives or regional standards, to undertake an assessment of existing baseline, Project-only, and future (baseline + Project), and cumulative effects.	The Impact Assessment will include an air quality assessment that will consider the effects of air emissions generated from the Project activities listed in Section 3.4 of the DPD. The Air Quality assessment will be characterized with an assessment of existing conditions, baseline, project-only, future, and cumulative effects sections, all of which will align with relevant federal and provincial guidance including BC Air Quality Objectives and Canadian Ambient Air Quality Standards. The potential effects of the Project emissions on community air quality will be determined by evaluating the local airshed and atmospheric dispersion. If dispersion modelling is deemed to be required, it will adhere to the BC Air Quality Dispersion Modelling Guidelines (2015). / The factors to be considered, and the scope of those factors will be described in the Joint Guidelines for the Project. A first draft of the Joint Guidelines will be prepared by GCT and then submitted to IAAC and BCEAO who will tailor the document and consult on it with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuance of the final Joint Guidelines.	Section 7.4. Emissions, Discharges and Wastes Section 7.11 Potential Cumulative Effects
Atmospheric Environment	3	Clarify the effectiveness of providing shore power as a mitigation measure to reduce emissions, if individual vessels are not required to have this technology.	Shore power is an effective mitigation measure to reducing CAC and GHG emissions and improving local air quality as it reduces vessel emissions and fuel consumption by allowing vessels to plug into the clean electrical grid and turn off their auxiliary diesel engines while docked. As stated in Section 7.4.1, GCT has shore power available at DP3 and is planning on providing further shore power connections for the DP4 Project. It is appreciated that not all container vessels currently have the technology to connect to shore power however the effectiveness of shore power for just one vessel has shown to eliminate 95 tonnes of air pollutants per vessel on average when connected to shore power during a typical stay at dock, which is equivalent to removing 20 vehicles off the road for a year. The capacity of the container vessel fleet that serves the west coast of North America for connecting to shore power is steadily increasing as newer vessels come online. This is particularly the case for the largest class of vessels, which the DP4 is designed to serve. It should be noted that container vessels to western North America tend to exhibit a chain of service to more than one port on the west coast rather than single origin-destination trips. This means that requirements for vessel shore power in California affect the vessels that stop at west coast Canadian ports. As such, shore power is expected to be a very effective mitigation at DP4.	Section 7.4.1. Air emissions
Archaeology	1	Impacts on archaeological resources at the Project site and impacts to archaeological sites from waves and resulting erosion from marine shipping	Based on past studies completed in the Roberts Bank area, GCT is aware of four archaeological sites and one heritage site that are all located over a kilometre away from the Project area. The most likely occurrence of archaeological features would be the wooden remains of tidal sturgeon weirs located around an infilled historic tidal channel that previously drained Canoe Passage and cuts across the Roberts Bank causeway approximately 300 m to 400 m from shore. Although it is not anticipated that the Project would interact with any known archaeological sites, if an archaeological site is encountered on provincial lands, the Project will proceed, at minimum, with procedures in accordance with conditions of a Section 12.4 Alteration Permit under the <i>Heritage Conservation Act</i> . Similarly, if any archaeological work is conducted on federal lands, the Project will proceed in accordance with federal archaeological practices and compliance requirements in coordination with Parks Canada. Any permitted alteration or mitigation of the site will be done with appropriate levels of consultation and collaboration with Indigenous nations to develop appropriate mitigations to address potential heritage effects. The Project will also comply with the requirements of the City of Delta's bylaws for Designated Heritage Properties. In regard to impacts associated with marine shipping, past studies have also concluded that ship-wake waves associated with similar Projects would not result in an adverse effect on archaeological or heritage sites in BC or the USA.	Section 7.7 Potential Effects on Heritage Resources
Archaeology	2	Request for the conduct of an archeological overview assessment/archeological Project assessment to understand existing baseline conditions).	An archaeological overview assessment was completed by Millennia Research Ltd in November 2014 ( <a href="https://iaac-aeic.gc.ca/050/documents/p80054/101346E.pdf">https://iaac-aeic.gc.ca/050/documents/p80054/101346E.pdf</a> ) and baseline archaeological conditions are well understood in the onshore, subtidal and intertidal areas, including the intertidal area overlapped by the DP4 expanded rail yard. The report did not recommend that additional AIA work be completed in the intertidal zone, but that further work be focused on developing appropriate mitigations, such as a Chance Find Procedure for all construction work. GCT is reviewing the report's conclusions and recommendations to help inform the Impact Assessment and understands the importance of protecting archaeological and heritage sites for future generations.	Section 7.7. Potential Effects on Heritage Resources

**TABLE C2: SUMMARY OF ISSUES RAISED AS IDENTIFIED IN THE JOINT SUMMARY OF ISSUES AND ENGAGEMENT.**

Topic	Number	High-level Summary of Issue	GCT Response	Addressed in the DPD
Agricultural Land Reserve	1	Concerned that the Project will negatively impact surrounding farmland in the provincial Agricultural Land Reserve (ALR), both as a result of heavy particulates and air contaminants settling on the soil, and from the conversion of ALR land to industrial land.	Under the proposed Deltaport expansion, GCT has no plans to negatively impact surrounding farmland in the Provincial Agricultural Land Reserve (ALR), as the lands required to expand are not within or subject to the BC ALR. As noted in the DPD, Section 3.9 and Section 7.5, although outside the care and control of GCT, there is a potential for the railways to require upgrades by a third party not solely related to the Project. Any specific upgrades that may be required to support DP4 have not yet been determined. GCT will continue to liaise with the rail companies, who would be responsible for the construction and operation of any upgrades that might be required. VFPA has recently acquired provincial ALR lands that have an option for transportation needs development in the area. The factors to be considered, and the scope of those factors, related to rail upgrades required for the Project will require further consultation and engagement with relevant agencies, Indigenous nations and rail companies. Air emissions will be assessed as stated in the DPD.	Section 7.5 Potential Socio-economic Effects
Climate Change and Greenhouse Gas (GHG) Emissions	1	Contribution of the Project's emissions on Canada's environmental commitments and climate change, and how this could impact regional, provincial and federal targets.	GCT is committed to reducing and avoiding GHG emissions where possible throughout the advancement of the Project. Section 7.4.3 of the DPD provides an estimate of the Project's emissions in accordance with the ECCC approach stated in the Strategic Assessment on Climate Change and federal and provincial guidance. This will be updated in the Impact Assessment as required. The Impact Assessment will also estimate the emissions generated from the Project based on the Project phases as stated in Section 3.4 of the DPD, describe the Project's contribution to best available technologies to mitigate GHG emissions from the Project and address the extent to which the effects of the Project hinder or contribute to BC and Canada's environmental obligations and climate change commitments.	Section 7.4.3. Greenhouse Gas Emissions
Climate Change and Greenhouse Gas (GHG) Emissions	2	Clarity on the scope of activities included in the GHG emissions estimates (including incidental physical activities), and descriptions of the methodologies and assumptions used for the quantification of GHG emissions from each activity.	Section 7.4.3 of the DPD adheres to the scope requirements stated in ECCC's Strategic Assessment of Climate Change in addition to federal and provincial requirements for a DPD. GHG methods, assumptions emission factors and emission data are presented in Section 7.4.3. This information will be updated as applicable in the Impact Assessment. which will provide a quantification of the net GHG emissions generated from various phases of the Project, including methodology, data, assumptions and emissions factors used for the quantification of the Project's GHG emissions. The scope of the assessment will align with the requirements of ECCC's Strategic Assessment of Climate Change guidance and any relevant provincial and federal requirements.	Section 7.4.3. Greenhouse Gas Emissions
Climate Change and Greenhouse Gas (GHG) Emissions	3	Consideration of best available technologies, best environmental practices, and mitigation measures to reduce GHG emissions.	GCT is committed to reducing and avoiding GHG emissions where possible through the best available technologies, mitigation measures and environmental practices as the Project design evolves and the project formally enters the assessment process. The use of low carbon technologies and electric equipment are some of the key opportunities GCT will consider while electrized yard cranes and hybrid/battery-powered vehicles are currently being considered for the Project. Additional best available technologies will be considered as per the ECCC's Strategic Assessment of Climate Change guidance. The Impact Assessment will also describe the best available technologies to mitigate GHG emissions associated with the Project and address the extent to which potential effects hinder or contribute to BC and Canada's environmental obligations and climate change commitments.	Section 7.4.3. Greenhouse Gas Emissions
Climate Change and Greenhouse Gas (GHG) Emissions	4	Clarity of the type of activities that would result in impacts on carbon sinks by ecosystem type.	Section 7.4.3 of the DPD, in accordance with the ECCC's Strategic Assessment of Climate Change guidance requirements, provides a description of activities that would result in an impact on carbon sinks. The Impact Assessment will further assess the impact of the Project on carbon sinks including land areas directly impacted by the Project based on ecosystem type.	Section 7.4.3. Greenhouse Gas Emissions
Culture	1	Harm from cultural interference, loss of culture, or limited access to traditional territories and access to traditional foods, and potential for Project to result in significant cumulative effect on aspects of Indigenous current use and cultural heritage.	The Impact Assessment will evaluate the potential effects of the Project on Indigenous Interests including resources for traditional purposes. Cumulative effects will also be addressed as part of the Impact Assessment where residual effects cannot be completely mitigated. Information obtained from engagement activities will be included in the Impact Assessment where application, and with consent from relevant Indigenous nations, as application materials to further address potential effects of the Project on Indigenous Interests. GCT is committed to engaging and consulting with potentially affected Indigenous nations and looks forward to continued engagement to better understand this concern. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines for the Project. A first draft of the Joint Guidelines will be prepared by GCT and then submitted to IAAC and BCEAO who will tailor the document and consult on it with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuance of the final Joint Guidelines.	Section 7.8. GCT's Preliminary Understanding of Potential Effects on Indigenous Interests from Project Activities
Culture	2	Effects to marine mammals resulting in effects to Indigenous spirituality, culture, heredity, cosmology and mythology.	The Impact Assessment will include an assessment of the effects on marine mammals from the Project. The scope of the marine mammal assessment and its effects on Indigenous spirituality, culture, heredity, cosmology and mythology have not yet been defined. Indigenous Knowledge from Indigenous nations will also be incorporated into the assessment. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines for the Project. A first draft of the Joint Guidelines will be prepared by GCT and then submitted to IAAC and BCEAO who will tailor the document and consult on it with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuance of the final Joint Guidelines. GCT appreciates this issue and looks forward to continued engagement during this process.	Section 7.8 GCT's Preliminary Understanding of Potential Effects on Indigenous Interests from Project Activities

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Topic	Number	High-level Summary of Issue	GCT Response	Addressed in the DPD
Culture	3	Effects of increased marine shipping activity on cultural health, including from reduced access to fishing and harvesting sites, reduced ability to travel in small vessels for subsistence travel, and effects to important cultural marine mammals such as Southern Resident Killer Whale (SRKW).	GCT understands concerns about the cumulative effects of shipping on marine use and is very pleased to see federal government, Indigenous Nation and other initiatives, e.g., Transport Canada's Cumulative Effects of Marine Shipping as part of the Oceans Protection Plan, and the Salish Sea initiative as part of the Trans Mountain Pipeline Expansion Project, which are at the strategic cumulative level, rather than the project level. GCT is keen to support these initiatives and will build on the results within the Impact Assessment to understand the role of DP4. The increase in the number of ships calling at GCT is predicted to be small relative to the increase in the volume of containers shipped (~14% increase in shipping for an ~83% increase in container volume), and very small relative to existing shipping in the Salish Sea. Marine use will be assessed within the Impact Assessment and GCT is committed to working with Indigenous nations and other marine users to avoid effects on marine use. GCT's experience of operating Deltaport and Vanterm and close relationship with the shipping lines will support this process. SRKW will be assessed as part of the Impact Assessment and a Species at Risk Act permit may be required. GCT understands its responsibility of operating and previously constructing within SRKW critical habitat over many years and again appreciates the extensive work that is underway to better understand the cumulative effects on SRKW and how better to protect this iconic species. GCT is also evaluating specific studies to inform the Impact Assessment on key issues such as underwater noise and food availability and is looking to collaborate with Indigenous nations and researchers in such assessments, in addition to specialists that are already part of GCT's team.	Section 7.8 GCT's Preliminary Understanding of Potential Effects on Indigenous Interests from Project Activities
Cumulative Effects	1	Cumulative effects (including from marine shipping) on the Salish Sea ecosystem, the Fraser River estuary, air quality, noise and vibration, sensory disturbance, migratory birds, wetlands, underwater noise, Southern Resident Killer Whales, fish and fish habitat, wildlife species, climate change, and intangible cultural heritage.	The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines for the Project. A first draft of the Joint Guidelines will be prepared by GCT and then submitted to IAAC and BCEAO who will tailor the document and consult on it with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuance of the final Joint Guidelines.	Section 7.11 Potential Cumulative Effects
Cumulative Effects	2	Lack of an appropriate baseline from which to measure existing cumulative effects and need for a holistic cumulative effects assessment incorporating Indigenous knowledge of all past and present development, to inform the DP4 impact assessment.	GCT acknowledges the importance of assessing cumulative effects and potential Project impacts on Indigenous rights and Interests and looks forward to collaborating with all Indigenous nations to incorporate Indigenous knowledge into the Project assessment, not limited to the assessment of cumulative effects. GCT looks forward to advancing an assessment that is informed by Indigenous knowledge and western science and engaging with Indigenous nations on the types of Indigenous knowledge that may be available.	Section 7.11 Potential Cumulative Effects, Section 7.8 GCT's Preliminary Understanding of Potential Effects on Indigenous Interests from Project Activities
Cumulative Effects	3	Request that cumulative effects assessment incorporate the 40 different infrastructure Projects being advanced by the Greater Vancouver 2030 Program.	To assess the cumulative effects on a given VC, the residual effects of the Project will be assessed in combination with the potential effects of other reasonably foreseeable Projects (Projects that are either proposed (public disclosure) or have been approved to be built, but are not yet built) and activities that overlap with the effects of the Project. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines for the Project. A first draft of the Joint Guidelines will be prepared by GCT and then submitted to IAAC and BCEAO who will tailor the document and consult on it with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuance of the final Joint Guidelines.	Section 7.11 Potential Cumulative Effects
Cumulative Effects	4	Cumulative effects on Indigenous Group's ability to engage in current use of lands and resources for traditional purposes, practice their culture, governance, as well as impacts to Indigenous rights. This includes the extent to which the ability to exercise such rights that have already been lost.	The Impact Assessment will require an assessment of the current use of lands and resources for traditional purposes. The assessment will also include the cumulative impacts on biophysical VCs such as impacts on wildlife populations and impacts on specific sites of traditional use, recognizing the current ability to practice an Indigenous right may already be constrained due to factors such as previous developments. GCT is committed to continuing to work with Indigenous nations to better understand baseline conditions and to support the analysis of the effects on Indigenous peoples that result from changes to the environment and on health, social and economic conditions that could result from the Project. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines for the Project. A first draft of the Joint Guidelines will be prepared by GCT and then submitted to IAAC and BCEAO who will tailor the document and consult on it with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuance of the final Joint Guidelines.	Section 7.8 GCT's Preliminary Understanding of Potential Effects on Indigenous Interests from Project Activities
Cumulative Effects	5	Ability of Indigenous nations to participate meaningfully in the management of those effects.	GCT is committed to continuing to work with Indigenous nations throughout the Impact Assessment process, and should the Project receive the necessary approvals and advance to construction and work together to find mutually beneficial arrangements to manage potential effects into the future. GCT is interested to learn more about the ways in which Indigenous nations would like to participate in the assessment and management of cumulative effects, so that we can discuss where opportunities may exist. GCT welcomes further engagement on this issue and looks forward to continued engagement on this issue as the Impact Assessment progresses.	Section 8.4 Summary of Preliminary Engagement with Indigenous Nations, Section 8.7 Summary of Planned Engagement Activities and Opportunities to Work Together



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Topic	Number	High-level Summary of Issue	GCT Response	Addressed in the DPD
Cumulative Effects	6	Interest in long-term plans to assess cumulative effects from increased ship and tanker traffic to and from the site prior, during, and after construction, as well as into future.	GCT understand the importance of the assessment cumulative effects, including those associated with increased ship traffic in the Salish Sea. Although some of the issues identified are beyond GCT's care and control as GCT including the DP4 Project will not handle tanker traffic and will only handle container vessels. Cumulative effects will be addressed as part of the Impact Assessment. GCT welcomes further engagement on this issue and looks forward to engaging on this issue as the Project progresses through the assessment process.	Section 7.11 Potential Cumulative Effects
Current and Future Generations	1	Concern that further degradation of Roberts Bank will reach a tipping point and reduce the quality of life for Lower Mainland residents, as well as destroy natural resources for future generations.	GCT appreciates the importance of Roberts Bank to residents of the Lower Mainland. The Impact Assessment will include mitigation measures and monitoring programs to avoid, minimize, restore or otherwise offset potential effects from the Project. GCT welcomes further discussion on this concern and the opportunity to further engage and consult on this issue.	Section 7.13 Mitigation and Management Approaches Section 7.14 Monitoring
Differential Impacts upon Diverse Persons and Groups Differential Impacts upon Diverse Persons and Groups	1	Differential impacts based on sex and gender, which may include groups identified by age, place of residence, ethnicity, socio-economic status, employment status or disability for example, in a variety of ways including: <ul style="list-style-type: none"> <li>• Employment opportunities;</li> <li>• Access to revenues;</li> <li>• Access to safe and affordable housing;</li> <li>• Compensation or benefits and expanded investment in the local community;</li> <li>• Decision making roles for new innovation and technologies; and</li> <li>• Access to services and programs that account for the perspective, knowledge and experiences of individuals and communities</li> </ul>	Gender-based analysis plus (GBA+ analysis) approach will be used to collect gender-disaggregated data and assess other vulnerability factors, such as age, sex, gender, ethnicity, disability and socio-economic status in particular through the assessment of VCs in the social, economic, and health pillars. Further disaggregation may be used, wherever relevant. Culturally relevant research and consultation will be conducted to obtain inclusive quantitative and qualitative data. Findings of the GBA+ analysis will inform the development of the assessment methodology and the design of mitigation and enhancement measures, to ensure equitable distribution of economic benefits and opportunities generated by the Project. GCT team members have also completed GBA+ training and look forward to further engaging and consulting on this issue.	Section 7.5 Potential Socio-economic Effects
Differential Impacts upon Diverse Persons and Groups	2	The Project may create and exacerbate existing inequalities.	Gender and diversity analysis (GBA+) will be conducted to collect comprehensive socio-economic data disaggregated based on but not limited to gender, age, disability and socio-economic status. As part of this analysis, linkages between inequalities at different community levels will be examined. Impacts on vulnerable populations and inequalities across several domains (e.g., employment, access to health care, etc) will also be examined. Indigenous and public engagement, as well as key informant interviews will be conducted to understand risk perceptions, existing barriers and specific needs and gaps. Data will be used to track inequalities and design economic effects mitigation and enhancement measures, ensuring equitable distribution of economic benefits and opportunities, generated by the Project.	Table 14 List of anticipated baseline studies for the Project, Section 7.5 Potential Socio-economic Effects
Economic Conditions	1	Effects of the Project on the local and regional economy (including BC Tourism and commercial fisheries), local job creation, and labour force.	As part of the Project assessment, GCT will conduct an economic analysis and will provide an objective assessment of the Project's contribution to the local and regional economy, including measures of economic activity such as GDP, employment, labour income and government tax revenues. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines for the Project. A first draft of the Joint Guidelines will be prepared by GCT and then submitted to IAAC and BCEAO who will tailor the document and consult on it with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuance of the final Joint Guidelines.	Table 14 List of Anticipated Baseline Studies for the Project Section 7.5 Potential Socio-economic Effects
Economic Conditions	2	Consideration of employment barriers for under-represented groups and hiring strategies to ensure they are represented.	Existing barriers to education and training, as well as to obtaining and retaining employment among both Indigenous and non-Indigenous populations will be examined. Data sources may include the Industry Training Authority and National Collaborating Centre for Indigenous Health. Secondary research may be supplemented by key informant interviews. A gendered and equity-informed approach will be considered to design economic effects mitigation and enhancement measures, to ensure equitable distribution of economic benefits and opportunities, generated by the Project. GCT will also consult with BC Maritime Employers Association and International Longshore and Warehouse Union regarding hiring strategies.	Section 7.5 Potential Socio-economic Effects Section 3.7.3 Workforce Environment

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Topic	Number	High-level Summary of Issue	GCT Response	Addressed in the DPD
Economic Conditions	3	Effects of the Project to Indigenous communities, and details on compensation, including emergency compensation, for any impacts, as well as how wealth generated will be shared.	Through ongoing engagement, GCT has identified potential environmental and socio-economic effects on Indigenous communities. GCT will continue working and engaging with Indigenous communities to develop culturally appropriate assessment methods and design mitigation and enhancement measures. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines for the Project. A first draft of the Joint Guidelines will be prepared by GCT and then submitted to IAAC and BCEAO who will tailor the document and consult on it with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuance of the final Joint Guidelines.	Section 8.4 Summary of Preliminary Engagement with Indigenous nations
Economic Conditions	4	Clarity on the accuracy of market projections for the container shipping industry.	Market projections and forecasts for the container shipping industry are provided by consultants specializing in world economics. The port sector is closely related to the changes in global economic activity and international trade. Market projections typically include three separate scenarios including a low forecast, medium forecast and high forecast. The forecast used to determine the need for the DP4 project is based on the medium forecasted analysis provided by Black Quay in 2019. Container volumes on Canada's west coast have had an average compounded annual growth rate of 4.1% per year from 2010 to 2020 and have been in line with previous market forecasts. Annual growth in 2020 dipped below the average compound annual growth rate and posted only 2% growth, largely due to the COVID-19 pandemic. GCT plans on updating the previous Black Quay forecast report during the preparation of the assessment for the Project to better determine the effects of COVID-19 on global activity and international trade developments.	Section 1.3.2 Need for the Project and Rationale
Economic Conditions	5	Concern that opportunity costs of building the Project are higher than the stated benefits due to lack of appropriate valuation of the benefits that the local environment provides.	GCT acknowledges the concern and appreciates the numerous values that Roberts Bank provides our community. Our long history of operations, including past expansions at Deltaport, has resulted in an in-depth understanding of those values and GCT is committed to avoiding and reducing impacts to the extent possible in collaboration with Indigenous nations, regulators, members of the public and various stakeholder groups.	N/A
Ecosystems	1	Effects of the Project on the sensitive Fraser River estuary and Salish Sea ecosystem, including on globally significant wetlands and critically important bird habitat.	The Impact Assessment will consider potential Project effects on wetlands and wildlife habitat in the assessment of marine resources. Marine habitat will be mapped and opportunities to avoid, minimize, restore, compensate, or offset potential adverse effects to critical ecosystems will be identified. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines for the Project and will be confirmed through additional engagement with Indigenous nations, stakeholders, the public, federal and provincial regulators.	Section 7.2 Potential Effects in Relation to <i>Impact Assessment Act</i> Requirements, Section 7.3 Potential Environmental Effects on Federal Land in a Province Other than the Province in which the Project is Proposed to be Carried Out or Outside Canada
Effects on the Environment on the Project	1	Effects of the environment on the Project such as earthquakes, climate change, and sea-level rise.	The Impact Assessment will include an assessment of any change to the Project that may be caused by the environment, as per requirements stated in Section 22(1)(j) of the Impact Assessment Act and provincial requirements. The assessment will describe environmental factors such as extreme weather conditions, natural hazards and climate change as well as include mitigation measures to reduce the likelihood of effects on the Project. The Joint Guidelines document will present the applicable events within the "Effects of the Environment on the Project" section. A first draft of the Joint Guidelines will be prepared by GCT and then submitted to IAAC and BCEAO who will tailor the document and consult on it with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuance of the final Joint Guidelines.	Section 7.10 Effects of the Environment on the Project
Effects on the Environment on the Project	2	Clarity on incorporation of climate change considerations into Project design, and the development of habitat compensation plans.	As per the requirements of ECCC's Strategic Assessment of Climate Change in addition to federal and provincial requirements, the inclusion of a climate resilience assessment will be required to assess the ability of the Project and Project design to anticipate, withstand, recover and adapt in response to climate-related hazards. The development of habitat compensation plans will be completed in accordance with federal and provincial requirements. The Joint Guidelines will provide information for the Impact Assessment on how the Project is resilient to and at risk from both the current and future impacts of climate change. A first draft of the Joint Guidelines will be prepared by GCT and then submitted to IAAC and BCEAO who will tailor the document and consult on it with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuance of the final Joint Guidelines.	Section 1.4 Environmental Assessment Regulatory Requirements
Environmental and Impact Assessment Processes	1	Concerns about the credibility of information generated throughout the assessment process and the opportunity to participate in the process.	It is the view of GCT that this comment is outside of their care and control. GCT will re-direct this comment to the BC EAO and the IAAC who are leading the Impact Assessment process and are in the best position to address this concern.	N/A
Environmental and Impact Assessment Processes	2	Concerns regarding public confidence in the assessment process; including need for greater openness and transparency regarding the process and opportunities for meaningful public engagement	It is the view of GCT that this comment is outside of their care and control. GCT will re-direct this comment to the BC EAO and the IAAC of Canada who are leading the Impact Assessment process and are in the best position to address this concern.	N/A

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Topic	Number	High-level Summary of Issue	GCT Response	Addressed in the DPD
Environmental and Impact Assessment Processes	3	Clarification on scope of impact assessment, including effects from road, rail activities and marine shipping.	The scope of the Impact Assessment will ultimately be decided by federal and provincial regulators, acknowledging that some issues are beyond GCT's care and control. The IAAC and BC EAO will provide opportunities for members of the public, Indigenous nations and others to provide input via formal engagement on the scope of the DP4 assessment and the factors to be considered once it is determined that the Project is ready to formally enter the cooperative assessment process at the end of the early engagement/planning phase.	N/A
Environmental and Impact Assessment Processes	4	Clarification on how size of the ships will be assessed, as opposed to just the increase in number.	The scope of the Impact Assessment has yet to be confirmed, including the scope of factors associated with marine shipping. The decision ultimately lies with federal and provincial regulators who will provide opportunities for members of the public, Indigenous nations and others to provide input via formal engagement to be carried out once it is determined that the Project is ready to formally enter the cooperative assessment process at the end of the early engagement/planning phase.	N/A
Environmental and Impact Assessment Processes	5	Effects must be avoided, and mitigation measures pursued to the greatest extent, including rehabilitation, planting of native species/removal of invasive species, effective monitoring, and placing openings into the Roberts Bank and ferry causeway.	GCT's goal is to reduce the Project footprint to the extent possible with a focus on avoiding impacts from the outset (including direct, indirect and cumulative effects). GCT has already adjusted some project components based on feedback from Indigenous nations, stakeholders and agencies such as minimizing expansion on the west side of the causeway. GCT is also aware of existing hydraulic openings in the Roberts Bank causeway. GCT looks forward to continuing to collaborate with regulators, Indigenous nations, the public and stakeholders to better understand and assess the values that are of key importance, including appropriate mitigation and compensation where impacts cannot be avoided.	Section 7.12 Determination of Potential Effects, Section 7.13 Mitigation and Management Approaches, Section 7.14 Monitoring
Fish and Fish Habitat	1	Effects on fish and fish habitat (including salmon and crab) through habitat destruction and degradation, dredging, pile driving noise/vibrations, impediments to migration, and mortality.	The Impact Assessment will consider potential Project effects on fish and fish habitat in the Marine Resources assessment. Marine habitat will be mapped and opportunities to avoid, minimize, restore, compensate, or offset potential adverse effects to critical ecosystems will be identified. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines for the Project. A first draft of the Joint Guidelines will be prepared by GCT and then submitted to IAAC and BCEAO who will tailor the document and consult on it with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuance of the final Joint Guidelines.	Section 7.2.1 Fish and Fish Habitat and Aquatic Species
Fish and Fish Habitat	2	Effects to fish from changes in marine water quality and sediment re-suspension	The Impact Assessment will consider potential Project effects of water quality on fish and fish habitat in the Marine Resources assessment. Opportunities to avoid, minimize, restore, compensate, or offset potential adverse effects to critical fish species will be identified. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines for the Project. A first draft of the Joint Guidelines will be prepared by GCT and then submitted to IAAC and BCEAO who will tailor the document and consult on it with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuance of the final Joint Guidelines.	Section 7.2.1 Fish and Fish Habitat and Aquatic Species
Fish and Fish Habitat	3	Effects to Indigenous peoples and Indigenous rights as a result of adverse effects to fish.	The Impact Assessment is required to assess effects to Indigenous Interests, which include rights to harvest, including fish. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines for the Project and will be confirmed through additional engagement with Indigenous nations, stakeholders, the public, federal and provincial regulators. GCT is committed to consulting on this concern and looks forward to continued engagement with you during this process	Section 7.8 GCT's Preliminary Understanding of Potential Effects on Indigenous Interests from Project Activities
Fish and Fish Habitat	4	Request for a clear description of measures to avoid and mitigate effects to fish and fish habitat, and a description of offsetting measures for any residual effects following avoidance and mitigation. Measures must speak to their effectiveness and feasibility.	The Impact Assessment will consider potential Project effects on fish and fish habitat in the Marine Resources assessment. Marine habitat will be mapped and opportunities to avoid, minimize, restore, compensate, or offset potential adverse effects to critical ecosystems will be clearly described including their effectiveness and feasibility. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines for the Project. A first draft of the Joint Guidelines will be prepared by GCT and then submitted to IAAC and BCEAO who will tailor the document and consult on it with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuance of the final Joint Guidelines.	Section 7.2.1 Fish and Fish Habitat and Aquatic Species
Fish and Fish Habitat	5	Concern that Project will negate existing environmental remediation programs and provincial and federal commitments, aimed at restoring resources (including fish) in the Fraser River.	GCT appreciates the importance of the Fraser River and will support any applicable restoration efforts for fish and fish habitat for the Fraser River. The Impact Assessment will adhere to federal and provincial commitments related to fish and fish habitat in the Fraser River. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines for the Project. A first draft of the Joint Guidelines will be prepared by GCT and then submitted to IAAC and BCEAO who will tailor the document and consult on it with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuance of the final Joint Guidelines.	N/A
Geology, Geochemistry, and Geological Hazards	1	Inclusion of a seismic hazard assessment and effects related to seismic activity	The inclusion of a seismic hazard assessment will be included in the Impact Assessment as per federal requirements under Section 22(1)(j) of the <i>Impact Assessment Act</i> . GCT anticipates earthquakes to be included in the seismic hazard assessment. Further details on the seismic hazard assessment will be presented in the Joint Guidelines. A first draft of the Joint Guidelines will be prepared by GCT and then submitted to IAAC and BCEAO who will tailor the document and consult on it with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuance of the final Joint Guidelines.	Section 7.10 Effects of the Environment on the Project

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Geology, Geochemistry, and Geological Hazards	2	Inclusion of the effects of the Project on tidal and coastal geomorphic environments, including increased sedimentation on the foreshore and wake effects.	Coastal geomorphology and sediment transport will be assessed within the Project assessment. This will include potential effects on Roberts Bank, such as ship wake and propeller wash. It will also include assessment and mitigation to avoid dendritic channels forming. Given GCT's experience operating Deltaport and in particular, constructing Deltaport Third Berth, GCT is best placed to understand these issues and has already incorporated them into the engineering design for DP4 undertaken to date.	N/A
Human Health	1	Concern regarding effects to human health from increased air, light, vibration and noise pollution, including from marine, road and rail activities.	The Impact Assessment will consider potential Project effects to human health associated with air pollution, vibration and noise within local and regional assessment areas, which have yet to be defined. The proposed scope of the human health assessment will be presented in the Joint Guidelines. A first draft of the Joint Guidelines will be prepared by GCT and then submitted to IAAC and BCEAO who will tailor the document and consult on it with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuance of the final Joint Guidelines. Due to the project's offshore location, exposure of human residents in the area to light associated with the Project is anticipated to be minimal and will not be quantitatively assessed as part of the Impact Assessment for human health risk assessment.	Section 7.6 Potential Effects on Human Health and Community Wellbeing
Human Health	2	Concern regarding effects to Indigenous health because of real or perceived changes in the quality of marine species relied upon for food harvesting, health and cultural identity.	The Impact Assessment will consider potential Project effects on the quality of harvestable marine food items, as well as human health risk implications, within the local assessment area. Effects to Indigenous nations' health, including relationships to harvesting, will be addressed as part of the Project assessment. Application materials will also further address the potential effects of the Project on Indigenous Interests that have been identified in initial engagement activities. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines for the Project. A first draft of the Joint Guidelines will be prepared by GCT and then submitted to IAAC and BCEAO who will tailor the document and consult on it with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuance of the final Joint Guidelines.	Section 7.8 GCT's Preliminary Understanding of Potential Effects on Indigenous Interests from Project Activities
Human Health	3	Inclusion of maps and diagrams identifying human receptor locations and distances between them and the Project.	The human health assessment will include maps and figures depicting human receptor locations and distances between the Project and those receptors will be included in the Project Assessment. Relevant locations will be determined through a problem formulation and consideration of the local study area developed as part of the Project assessment.	N/A
Human Health	4	Request for meaningful engagement on mitigations and compensation for effects to air quality, noise, light pollution.	As the Project progresses through detailed design, GCT is committed to implementing and considering mitigations and compensations for air quality, noise and light pollution and incorporating successful design elements from previous developments at Roberts Bank. Mitigation measures for potential Project effects will be outlined as part of the Impact Assessment which will be shared with Indigenous nations, regulators and the public for review and comment.	Section 7.13 Mitigation and Management Approaches
Human Health	5	Increased psychological and emotional stress from uncertainty over Project effects.	Uncertainty is a key component that must be addressed in all project assessments. Under federal and provincial guidelines, predictions of residual effects to VCs or Indigenous interests require characterization of uncertainty and the level of confidence in predicted residual effects. This may include a description of the nature and degree of uncertainty and confidence related to the data, modeling and methods used in the analysis of effects. Where uncertainty exists, additional monitoring or adaptive management may be required as a condition of project approvals to ensure mitigations are effective and works as predicted. The same approach will be required for the DP4 Impact Assessment to reduce uncertainty (and stress).	N/A
Indigenous People's Right	1	Concerns raised by Indigenous nations about shipping effects on fishing and harvesting rights, food security, use/enjoyment of treaty lands, and human health effects from pollution that negatively impact treaty rights, aboriginal title, governance rights, and culture.	The Impact Assessment is required to assess effects to Indigenous Interests, which include rights to harvest, including fish. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines for the Project. A first draft of the Joint Guidelines will be prepared by GCT and then submitted to IAAC and BCEAO who will tailor the document and consult on it with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuance of the final Joint Guidelines.	Section 7.8 GCT's Preliminary Understanding of Potential Effects on Indigenous Interests from Project Activities
Indigenous People's Right	2	Clarity on how the United Nations Declaration on the Rights of Indigenous People's will be applied to the assessment.	GCT supports the principles of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). The processes set out in the <i>Impact Assessment Act</i> and the <i>BC Environmental Assessment Act</i> align fundamentally with the objectives of Free, Prior and Informed Consent. As a result, through participation in the Impact Assessment, Indigenous nations can provide their Free, Prior and Informed Consent in relation to the Project. Further information about this can be found in the following document: <a href="https://www2.gov.bc.ca/assets/gov/environment/natural-resource-stewardship/environmental-assessments/environmental-assessment-revitalization/documents/free_prior_informed_consent_in_an_ea_context.pdf">https://www2.gov.bc.ca/assets/gov/environment/natural-resource-stewardship/environmental-assessments/environmental-assessment-revitalization/documents/free_prior_informed_consent_in_an_ea_context.pdf</a> .	Section 1.4 Environmental Assessment Regulatory Requirements.
Indigenous People's Right	3	Clarity on whether the alternatives assessment considered impacts to Indigenous rights, including fishing grounds.	The Impact Assessment will include an assessment of "alternative means of carrying out the project", and a rationale for the preferred approach/design based on various factors, including technical feasibility and financial viability. The Project location considers minimizing impacts to no float zones at Roberts Bank and avoidance of Indigenous crabbing grounds where possible. Feedback from ongoing engagement with Indigenous nations is also being used to inform the preferred alternative, and GCT welcomes further discussions to understand concerns in more depth, and to explore ways GCT can address concerns throughout the Impact Assessment process.	Section 3.9 Alternative Means of Carrying out the Project

**TABLE C2: SUMMARY OF ISSUES RAISED AS IDENTIFIED IN THE JOINT SUMMARY OF ISSUES AND ENGAGEMENT.**

Topic	Number	High-level Summary of Issue	GCT Response	Addressed in the DPD
Indigenous People's Right	4	Impacts from accidents and malfunctions to Aboriginal and or Treaty rights, including resource harvesting, traditional practices and culture and heritage sites.	The Joint Guidelines must include a risk-based approach for the assessment of malfunctions and accidents that could impact Indigenous Interests identified for the Project. GCT appreciates this concern and will provide additional information about effects from accidents and malfunctions to Indigenous Interests including Aboriginal and Treaty rights during the Project assessment. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines for the Project. A first draft of the Joint Guidelines will be prepared by GCT and then submitted to IAAC and BCEAO who will tailor the document and consult on it with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuance of the Joint Guidelines.	Section 7.9 Public and Environmental Safety
Indigenous People's Right	5	Concern of the usage of past accommodation measures or old data from past Projects being utilized as supplementary or supporting information to support this proposed Project.	GCT is committed to ensuring the Impact Assessment contains robust, applicable, current, defensible and appropriate data. There will be many different sources used to support the assessment of the Project, which will be clearly described in Project Assessment. If there are any specific concerns about certain data that may be used to assess the Project, GCT would welcome that information. GCT looks forward to further engagement and consultation on this issue.	N/A
Indigenous People's Right	6	Potential Project interactions with sense of place and identity including increased disruption of sense of place as a result of changes to valued places and place characteristics (e.g., from marine traffic, noise disturbances and ecological changes); disruption of identity and increased disconnection from cultural heritage due to direct and indirect Project effects on fishing, ceremonies, gatherings, and consumption of traditional foods.	The Impact Assessment will evaluate potential project interactions as it relates to Indigenous rights and interests and associated sense of place and identity. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines. A first draft of the Joint Guidelines will be prepared by GCT and then submitted to IAAC and BCEAO who will tailor the document and consult on it with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuance of the final Joint Guidelines. GCT looks forward to ongoing engagement to understand this concern in more detail, and to explore ways in which this concern can be expressed and addressed within the Impact Assessment and associated processes and documents.	N/A
Infrastructure and Services	1	Concern over port expansion and increases in road traffic, congestion and accidents on highways, bridges, tunnels, and increased rail shipping impacting safety and infrastructure in the Lower Mainland, Fraser Valley and Fraser Canyon.	The scope of the Impact Assessment has yet to be confirmed, including the scope of factors associated with road and rail. The decision ultimately lies with federal and provincial regulators, acknowledging that some issues are beyond the care and control of GCT. The BC EAO and IAAC will provide opportunities for members of the public, Indigenous nations and others to provide input via formal engagement on the scope of the Project and the factors to be considered once it is determined that the Project is ready to formally enter the assessment process at the end of the early engagement/planning phase.	Section 3.4. Project Activities
Infrastructure and Services	2	Shipping efficiencies should be a priority over development, including the development of off-site parking, container storage, and loading in areas that are less sensitive.	GCT continues to look at ways to be innovative and to maximize the land property provide to us under our lease arrangements. Since January 2010 when the area at Deltaport was last expanded to its current footprint, TEU throughput has increased from 1,125,047 TEU to 1,795,661 TEU during those ten years. This is a result of GCT's operational improvements through a combination of continued movement towards higher stacking container handling equipment and to the extent possible minimizing the time that shipping containers need to dwell at our terminals. GCT has exhausted currently known opportunities to remove from the terminal non-essential personnel and related ancillary infrastructures such as parking lots, office buildings and other structures that don't necessarily have to be on the actual terminal that services ships and cargoes. This included discussions in years past with the Tsawwassen First Nation about the availability of some of their lands to investigate the possibility of empty container storage not directly unloaded from trains and loaded to vessels however these lands have since been developed for other industrial uses. All other lands in close proximity to Deltaport are either classified under the Agriculture Land Reserve or otherwise not available to GCT. Therefore GCT is seeking to expand the Deltaport terminal through the DP4 expansion Project.	N/A
Land and Resource Use	1	Concern over zoning, as proposed development area for DP4 is not designated as "Industrial" under the Metro Vancouver Regional Growth Strategy.	As stated in Section 4.2, the existing GCT Deltaport and therefore a portion of the area planned for DP4 is designated as Industrial under the Metro Vancouver Regional Growth Strategy. The remaining area of DP4 is not covered by the plan and GCT will work with relevant agencies to engage further on this issue, if required. Much of DP4 would fall within land designated industrial within the City of Delta Official Community Plan, with the remainder not designated. The Impact Assessment will describe baseline conditions for land and resource use, such as the identification of land zoning, relevant land use plans or community plans that may be affected by the Project. This will include the location of and access to industrial land uses in the vicinity of the Project	Section 4.2 Planning Context and Zoning
Marine Use (Excluding Navigation)	1	Concern over effects on aquatic environments including water quality, marine mammals, fish and plant habitats, invasive species, harvesting, safety, culture, heritage, and economy caused by shipping and presence of ships	The Impact Assessment will consider potential Project effects (including shipping) to marine species and ecosystems in the Marine Resources assessment. Opportunities to avoid, minimize, restore, compensate, or offset potential adverse effects to critical ecosystems will be identified. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines for the Project. A first draft of the Joint Guidelines will be prepared by GCT and then submitted to IAAC and BCEAO who will tailor the document and consult on it with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuance of the final Joint Guidelines.	Section 7.2.1. Fish and Fish Habitat and Aquatic Species

**TABLE C2: SUMMARY OF ISSUES RAISED AS IDENTIFIED IN THE JOINT SUMMARY OF ISSUES AND ENGAGEMENT.**

Topic	Number	High-level Summary of Issue	GCT Response	Addressed in the DPD
Marine Use (Excluding Navigation)	2	Concern about disposal of dredged material and if it will be disposed of in the Salish Sea.	Dredged material will be re-used for causeway and terminal land reclamation and/or creation of new habitat within the Project as an alternative to disposal at sea. As stated in Section 3.3 if re-use material is limited, there may be potential for disposal at sea at an approved location, however the disposal at sea requirement has not yet been determined, and therefore a disposal site has not been identified. Additional permitting associated with disposal at sea may also require additional consultation led by federal authorities.	Section 3.3 Project Overview and Components
Marine Shipping	1	Request for marine shipping to be scoped into the assessment.	It is the view of GCT that this comment is outside of their care and control. As per guidance in the JSOIE report, GCT will re-direct this comment to provincial and/or federal agencies that are in a position to address this issue.	N/A
Marine Shipping	2	Clarity regarding increases in marine shipping should the short sea shipping berth not be constructed.	As explained in the DPD Section 3.4.4, a short sea shipping berth is being considered for inclusion into the Project, as marine shipping of containers on barges along the coast aligns with federal government initiatives and Metro Vancouver plans, and GCT's objective to increase operational efficiency and reduce impacts of truck transportation from GCT Deltaport. Short sea shipping is estimated to be 3.7 times more fuel-efficient than transportation by truck (Metro Vancouver, 2020a) which in turn leads to reduced fuel costs and consumption, reduced GHG emissions, less noise and air pollution. Short sea shipping would not be expected to affect the volume of containers or the size of the ships calling at GCT Deltaport and therefore there will be no increase in marine shipping should the short sea shipping berth not be constructed. Different stakeholders have suggested the inclusion or exclusion of the short sea shipping capability into the Project.	Section 3.4.4 Physical Activities Incidental to the Project
Marine Shipping	3	Request for a ship size and traffic study to evaluate the impacts of larger vessels (e.g., from Panamax to Post-Panamax and Ultra Large Container Vessel-size vessels) with detailed description of frequency, routing, speed, transit time of vessels, types and sizes of vessels, density statistics, cargo types, ports of origin and destination, and identification of areas where close encounters or crossing traffic is likely to support marine safety.	The rationale for the Project is to provide timely container handling capacity to Canadian exporters and importers based on historical and projected demand growth on the west coast of Canada. In 2019 GCT engaged Black Quay Consulting to provide an analysis of the timing of various container capacity options in British Columbia, and theoretical resultant effects on the future container fleet calling on the west coast of Canada. The report is included in the reference section of the DPD. The expected number of ships, ship size, frequency, basic routing and other important information for the DP4 Project are provided therein. By 2035, with DP4 built, the expected fleet size would include 8 weekly container services calling at Deltaport from the Far East. These services would come directly from Asia to the Pacific Northwest ports, including Vancouver and would be in the 10,000 to 17,000 TEU classes of ships. GCT plans on performing further analysis on future container volume projections for BC during the preparation of the EA and will include all pertinent information required to assess the effects of marine shipping. Although out of GCT's care and control, GCT will work closely with federal departments like Transport Canada and the Canadian Coast Guard during the eventual operation of DP4 to ensure Marine Aids to Navigation and communications and traffic services continue with their good work to regulate marine traffic as per the legislation according to local conditions, issue and disseminate navigation warnings and continue to ensure safe vessel passage in Canadian waters.	Section 1.3.2. Need for the Project and Rationale, Section 3.4.4. Physical Activities Incidental to the Project
Marine Shipping	4	Concern for effects on Indigenous people's environment, health, culture, heritage sites and rights including management, fishing, harvesting, transmission of knowledge and safety on the water	Potential effects to Indigenous people's environment, health, culture, heritage sites and rights will be addressed in the Project assessment. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines for the Project. A first draft of the Joint Guidelines will be prepared by GCT and then submitted to IAAC and BCEAO who will tailor the document and consult on it with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuance of the final Joint Guidelines.	Section 7.8 GCT's Preliminary Understanding of Potential Effects on Indigenous Interests from Project Activities
Marine Shipping	5	Concern regarding safety hazards from increased vessel traffic, loss of fishing gear, and the inhibition of harvesting activities.	Marine use and marine navigation will assess concerns regarding safety hazards from vessel traffic, as per federal and provincial requirements. The effects to Indigenous nations' ability to harvest is also within the scope of the assessment, as part of effects to Indigenous Interests. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines for the Project. A first draft of the Joint Guidelines will be prepared by GCT and then submitted to IAAC and BCEAO who will tailor the document and consult on it with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuance of the final Joint Guidelines.	Section 7.8 GCT's Preliminary Understanding of Potential Effects on Indigenous Interests from Project Activities
Marine Shipping	6	Clarity required regarding operational details, including vessel movements, for short sea shipping activities.	As explained in the DPD Section 3.4.4, a short sea shipping berth is being considered for inclusion into the Project, as marine shipping of containers on barges along the coast aligns with federal government initiatives and Metro Vancouver plans, and GCT's objective to increase operational efficiency and reduce impacts of truck transportation from GCT Deltaport. Short sea shipping is estimated to be 3.7 times more fuel-efficient than transportation by truck (Metro Vancouver, 2020a) which in turn leads to reduced fuel costs and consumption, reduced GHG emissions, less noise and air pollution. However, GCT is considering a short sea shipping berth in anticipation of future use as there are currently no off-terminal short sea shipping facilities to accommodate container movement from GCT Deltaport and none are planned. It is not possible at this stage to ascertain if/when or where such facilities would be constructed. It is therefore also impossible to define the vessel routes or volumes associated with short sea shipping. If plans for off-terminal short-sea shipping facilities are progressed during the Impact Assessment it may be possible to define vessel operational requirements associated with barging to that facility, and incorporate them into the Impact Assessment at that time.	Section 3.4.4 Physical Activities Incidental to the Project

**TABLE C2: SUMMARY OF ISSUES RAISED AS IDENTIFIED IN THE JOINT SUMMARY OF ISSUES AND ENGAGEMENT.**

Topic	Number	High-level Summary of Issue	GCT Response	Addressed in the DPD
Marine Mammals	1	Concern regarding the lack of assessment of impacts to Southern Resident Killer Whale, and the applicability of Section 11 of the Species at Risk Act.	SRKW will be assessed within the Project assessment. The Project location is considerate of avoiding chinook salmon habitat which is a key species in the SRKW diet. GCT will undertake studies to meet the requirements of the <i>Species at Risk Act</i> , including construction and operation of the Project within SRKW critical habitat. Therefore, there will be an extensive assessment of effects on SRKW, and associated mitigation and monitoring developed. To date, one Conservation Agreement has been implemented under Section 11 of the <i>Species at Risk Act</i> for SRKW. This is between DFO, VFPA and organizations representing the shipping industry, including those that call at Deltaport. The purpose of the conservation agreement is to develop, implement, monitor, assess and adapt voluntary measures to reduce the contribution of large commercial vessels to threats to SRKW and advance research and educational outreach to better understand how large commercial vessels contribute to threats to SRKW and their critical habitat, through the Enhancing Cetacean Habitat and Observation Program. GCT has discussed Conservation Agreements with DFO and is investigating ways to further support the existing or future conservation agreements.	Section 7.2.1 Fish and Fish Habitat and Aquatic Species Table 14 List of Anticipated Baseline Studies for the Project,
Marine Mammals	2	Concern about effects of marine shipping and short sea shipping to Southern Resident Killer Whale, including from increased underwater noise, ship strikes and physical disruption, anchorages (including resuspension of seabed contaminants like PCBs), and toxic fuel spills, and other non-acoustic pathways. This will lead to changes to behavior, foraging and survival.	GCT understands its responsibility of operating and constructing within SRKW critical habitat over many years and again appreciates the extensive work that is underway to better understand the cumulative effects on SRKW and how better to protect this iconic species. SRKW will be a crucial part of the Impact Assessment which will assess the potential effects on SRKW, consider the potential of Project activities and determine appropriate mitigation and monitoring requirements to address the potential effects. A cumulative effects assessment will also be completed regarding marine shipping and marine mammals.  A <i>Species at Risk Act</i> permit may be required. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines for the Project. A first draft of the Joint Guidelines will be prepared by GCT and then submitted to IAAC and BCEAO who will tailor the document and consult on it with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuance of the final Joint Guidelines.	Section 7.2.1 Fish and Fish Habitat and Aquatic Species Table 14 List of Anticipated Baseline Studies for the Project,
Marine Mammals	3	Concern about effects on marine mammals (including cetaceans and seals/sea lions) and reduction in their access to prey through reduced ability to forage, low prey availability, the alteration and destruction of fish habitat, and fish mortality (Chinook salmon).	Marine mammals will be included in the Project assessment, including SRKW which may also require a permit under the <i>Species at Risk Act</i> . GCT understands its responsibility operating within marine mammal habitat and appreciates the extensive work that is underway to better understand the cumulative effects on SRKW and how better to protect this iconic species. GCT will also be delivering specific studies within the Impact Assessment on key issues such as underwater noise and food availability and is looking to collaborate and support Indigenous nations and researchers in such assessments, in addition to specialists that are already part of GCT's team.	Section 7.2.1 Fish and Fish Habitat and Aquatic Species Table 14 List of Anticipated Baseline Studies for the Project,
Marine Mammals	4	Concern about marine noise levels and monitoring with respect to Southern Resident Killer Whale.	Underwater noise monitoring will be assessed within the Project assessment. SRKW will be a crucial part of the Impact Assessment which will assess the potential effects on SRKW, consider the potential of Project activities and determine appropriate mitigation and monitoring requirements to address the potential effects. The DPD includes a description of potential preliminary mitigations to reduce underwater noise during construction and operations.	Section 7.2.1 Fish and Fish Habitat and Aquatic Species Table 14 List of Anticipated Baseline Studies for the Project,
Marine Mammals	5	Clarity regarding the effectiveness of speed restrictions, vessel routing and construction mitigation measures as mitigation measures to reduce adverse effects to Southern Resident Killer Whale and its critical habitat.	The Impact Assessment will include a description of proposed mitigation measures, including those related specifically to reducing potential adverse effects to SRKW and their habitat. Where there is high uncertainty about the mitigation effectiveness (for example, where mitigation measures are proposed to be implemented for which there is little experience or questions about their effectiveness), a range of likely, plausible and possible outcomes will be assessed and additional studies, mitigation or adaptive management plans may be proposed.	Section 7.2.1 Fish and Fish Habitat and Aquatic Species Table 14 List of Anticipated Baseline Studies for the Project,
Migratory Birds	1	Concern over potential impacts to the Pacific Flyway and degrading the environment for migratory/overwintering shorebirds and waterfowl, birds of prey, and species at risk.	The Impact Assessment will consider potential Project effects on wildlife, species at risk, and their habitat in the Wildlife Resources assessment. Opportunities to avoid, minimize, restore, compensate, or offset potential adverse effects will be identified. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines for the Project. A first draft of the Joint Guidelines will be prepared by GCT and then submitted to IAAC and BCEAO who will tailor the document and consult on it with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuance of the final Joint Guidelines.	Section 7.2.2 Migratory Birds, Table 14 List of Anticipated Baseline Studies for the Project
Migratory Birds	2	Concern for effects to biofilm, and corresponding effects to migratory birds.	The Impact Assessment will consider potential Project effects on waterbirds and their habitat requirements in the Wildlife Resources assessment. Based on preliminary studies, the Project location is considerate of avoiding critical biofilm presence on the west side of the causeway. Opportunities to avoid, minimize, restore, compensate, or offset potential adverse effects will be identified. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines for the Project. A first draft of the Joint Guidelines will be prepared by GCT and then submitted to IAAC and BCEAO who will tailor the document and consult on it with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuance of the final Joint Guidelines.	Section 7.2.2 Migratory Birds, Table 14 List of Anticipated Baseline Studies for the Project
Migratory Birds	3	Clarity regarding distance of the Project to the Western Hemisphere Shorebird Reserve Network Site.	The Fraser River Estuary has been designated as a Western Hemisphere Shorebird Reserve Network Site (CA06) and is overlapped by the Project Area.	Section 4.3 Proximity to Parks and Protected Areas, Table 10 Parks and Protected Areas Located Within the Vicinity of the Project

**TABLE C2: SUMMARY OF ISSUES RAISED AS IDENTIFIED IN THE JOINT SUMMARY OF ISSUES AND ENGAGEMENT.**

Topic	Number	High-level Summary of Issue	GCT Response	Addressed in the DPD
Migratory Birds	4	Additional clarity required regarding effects pathways, including habitat degradation due to terminal operations, pollution associated with increased train and truck traffic (e.g., road, rail, and ship traffic), and climate change impacts.	The Impact Assessment will describe potential pathways by which the Project components and terminal activities could impact various VCs of the biophysical or human environment, including Indigenous interests. Effects pathways will be assessed through the selection of appropriate VCs, sub-components and intermediate components which will be described in the Joint Guidelines and subject to further engagement and approval by federal and provincial regulators.	Section 7.2.2 Migratory Birds, Table 14 List of Anticipated Baseline Studies for the Project
Navigation	1	Concern that navigational hazards are high in the Tsawwassen Ferry/Roberts Bank/Fraser River delta area and safety restrictions should be assessed and increased to mitigate collisions, spills and risk to public safety.	It is the view of GCT that this comment related to increased safety restrictions is outside of their care and control. As per guidance in the JSOIE report, GCT will re-direct this comment to provincial and/or federal agencies who are in a position to address this issue, in this case, VFPA, Coast Guard, Marine Communication and Traffic Services, Aids to Navigation and Transport Canada (under the <i>Canadian Navigable Waters Act</i> ) as appropriate for jurisdiction. Potential issues associated with collisions, spills and public safety will be included in the Project assessment.	N/A
Other	1	Consideration to re-establish the Fraser River Estuary Management Plan, which could inform future provincial and federal assessments.	It is the view of GCT that this comment is outside of their care and control. As per guidance in the JSOIE report, GCT will re-direct this comment to provincial and/or federal agencies that are in a position to address this issue. But GCT is supportive of the re-establishment of the Fraser River Estuary Management Plan.	N/A
Other	2	Plans and reports referenced in the Initial Project Description should be made public, such as a waste management plan and the Black Quay Consulting report.	The Black Quay Consulting report is included as a reference within the reference Section 10 of DPD. The report is also publicly available on the federal government website ( <a href="https://www.ceaa-acee.gc.ca/050/documents/p80054/130087E.pdf">https://www.ceaa-acee.gc.ca/050/documents/p80054/130087E.pdf</a> ). The Impact Assessment will include further details regarding a waste management plan.	Section 10 References
Other	3	Clarity on why Canada should risk its environment to handle U.S. container traffic coming through Roberts Bank, which could be handled by U.S. ports.	Canada is a trading nation and through working with the USA, Canada and the USA form a single North American shipping container market. Like the free flow of trade, environmental impacts do not stop at artificial national borders, but rather impact our collective ecosystem. Therefore, limiting the free flow of container trade between the USA and Canada would not result in Canadian environmental benefits, with any potential negative effects of trade localized in the USA and not materialize across an artificial 49th parallel. Furthermore, the level of US containerized cargo imports via Canadian ports as a share of total US port traffic remains marginal, averaging less than 3% over the past decade. Meanwhile, Canadian imports transiting through US ports represent a higher proportion of Canada's domestic cargo; at least 3 times the average of US cargo moving through Canadian ports. Simply put, US ports handle a substantially higher percentage of Canada-bound containerized cargo than Canadian ports handle US-bound cargo. (Source: <a href="https://tc.canada.ca/en/corporate-services/policies/north-american-shipping-container-market">https://tc.canada.ca/en/corporate-services/policies/north-american-shipping-container-market</a> ) Further information on West Coast of Canada container origin/destination trade is available in the Mercator report, GCT provided to the RBT2 Review Panel during the Socio-Economic Impacts hearing: <a href="https://www.ceaa-acee.gc.ca/050/evaluations/document/130305">https://www.ceaa-acee.gc.ca/050/evaluations/document/130305</a>	Section 1.3 Project Purpose, Need, and Rationale
Other	4	Potential effect of COVID-19 on Projected employment and job creation data, and potential effect of COVID-19 on trade.	The projected employment and job creation data for the construction and operation of the Project is not expected to be affected by COVID-19. Port workers in marine container terminals have been deemed essential service workers by Health Canada because of the role that the movement of containerized goods has in the economic welfare of Canada. World and Federal health agencies, including the World Health Organization and Health Canada, expect the COVID-19 pandemic to be contained and manageable through the implementation of the ongoing vaccination programs. GCT does not envision COVID-19 will have any negative effect on trade once the Project is completed and operational in ten years by 2030. Based just on 2020 container trade, Vancouver had a 2% increase in volumes as compared to 2019. In addition, volumes on the West Coast of North America (Canada/USA) were flat when comparing the same time period. Trade volumes started to pick up during Q4, 2020 after the initial concerns of COVID-19 worldwide and today all West Coast container ports are reporting high trade volumes, with Vancouver posting a 17% increase to volumes in January 2021 as compared to January 2020. However, GCT plans on updating the previous Black Quay forecast report during the preparation of the Impact Assessment to determine the effects of COVID-19 on global activity and international trade developments.	Section 3.7 Project Workforce
Other	5	Alternative uses/activities associated with the short sea shipping portion of the Project if short sea shipping is deemed unfeasible.	Short sea shipping does not substantially affect the terminal footprint required. If it is determined that short sea shipping is not economically viable, the terminal footprint and construction techniques would remain the same, as the area would be required for container storage expansion and the increase in the transfer of containers between ocean-going vessels and inland road transportation. The removal of the short sea shipping berth could result in a small reduction in the size of the dredge pocket through the reconfiguration of the terminal.	Section 3.9 Alternative Means of Carrying out the Project
Project Contribution to Sustainability	1	Metro Vancouver recommends incorporating Regional Green Infrastructure Network Resource Guide into development principles, design, and Project planning to enhance habitat, shade and other ecosystem services within built environment.	A core focus for GCT is ensuring that the Project maintains sustainable and environmentally-responsible practices as it advances the Project design. GCT will review and consider practices such as green infrastructure opportunities as stated in Metro Vancouver's Regional Green Infrastructure Network Resource Guide along with other related application resources. To learn more about GCT's Global Commitment visit <a href="https://globalterminals.com/globalcommitment/">https://globalterminals.com/globalcommitment/</a>	Section 3.4.2 Operations, Section 1.3.3 Project Benefits



**TABLE C2: SUMMARY OF ISSUES RAISED AS IDENTIFIED IN THE JOINT SUMMARY OF ISSUES AND ENGAGEMENT.**

Topic	Number	High-level Summary of Issue	GCT Response	Addressed in the DPD
Project Contribution to Sustainability	2	Concern regarding further development and the ability to maintain the ecological integrity of Roberts Bank and the Salish Sea.	GCT acknowledges the concerns and is committed to advancing the Project through a robust and coordinated assessment process under the federal <i>Impact Assessment Act</i> and provincial <i>Environmental Assessment Act</i> to evaluate potential effects to Roberts Bank and the Salish Sea. The assessment will also require an assessment of cumulative effects including those associated with other past, present and reasonably foreseeable projects that may overlap in time and space. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines for the Project. A first draft of the Joint Guidelines will be prepared by GCT and then submitted to IAAC and BCEAO who will tailor the document and consult on it with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuance of the final Joint Guidelines.	Section 7 Potential Effects of the Project
Public and Stakeholder Engagement	1	Concerned about consultation fatigue and duplication of efforts after being involved in the environmental assessment process for the Roberts Bank Terminal 2 Project.	GCT acknowledges that consultation fatigue, particularly in a digital setting, and duplication of effort is a concern for some stakeholders and the general public. GCT is working closely with its expert advisors to review all studies completed in the Project area and build upon the considerable depth of research already conducted. This includes studies and research made publicly available through the development of other proposed and completed projects in the area by subject matter experts, local Indigenous nations, and non-governmental organizations. GCT is committed to ensuring robust engagement is completed with all stakeholders and, to combat consultation fatigue, GCT has been utilizing a number of platforms and engagement methods to ensure there are a variety of ways to provide feedback on the proposed Project. Please refer to our Early Engagement Plan for additional details on how GCT will actively engage with stakeholders and the public throughout the process.	Section 6.1 Past and Present Environmental Studies in the Region, Section 7 Potential Effects of the Project
Purpose of and Need for the Project	1	Clarity on Project purpose, given potential that a future world economy could require less cargo shipping and greater local resilience.	The purpose of the Project is to provide timely container handling capacity to Canadian exporters and importers based on historical and projected demand growth on the west coast of Canada. The Project's purpose also aligns with the <i>Canadian Marine Act</i> Section 4 (a) to ensure that Canada is provided with the marine infrastructure that it needs to support and promote the country's economic and social competitiveness and trade objectives. GCT is constantly monitoring economic trends and does not currently foresee less demand for less cargo shipping but the Project's incremental approach is designed to act accordingly should market conditions change.	Section 1.3 Project, Purpose, Need and Rationale
Purpose of and Need for the Project	2	Clarity on Project need, given existing port capacity on the West Coast.	Container volumes on Canada's west coast have had an average Compounded Annual Growth Rate of 4.1% per year since 2010-2020, but it also included sharp declines during economic downturns and recoveries. The Project represents an approach of incremental expansion of west coast container terminal capacity aimed at timely, efficiently and competitively delivering container capacity to Canadian exporters, consumers, and supply chain partners. The development of the Project is timed to meet forecasts for growth, while the incremental approach provides for market fluctuations in container terminal demand and is designed to effectively accommodate increasing vessel size. GCT feels that the Project is the right-sized approach to deliver Canada's and our trading partners' needs.	Section 1.3.2. Need for the Project and Rationale
Social Conditions	1	Concern over impacts to local municipalities as a result of increased road/rail traffic.	GCT has been operating at Deltaport since 1997 and acknowledges the concerns raised by local municipalities associated with increased road and rail traffic. GCT is proposing to advance DP4 concurrently with over 40 different infrastructure projects and studies being advanced by the Greater Vancouver 2030 Program to expand existing off terminal road and rail infrastructure. Identification and mitigation of road, rail and other potential network constraints will be essential to the national supply chain, the local economy, and the quality of life for residents who live along the transportation corridor. The Impact Assessment will require an assessment of air quality, noise, vibration and other factors associated with increased road and rail traffic, and the scope of the assessment will be confirmed by federal and provincial regulators following additional engagement with municipalities, Indigenous nations and other interested parties.	Section 1.3.3 Project Benefits Section 7 Potential Effects of the Project
Social Conditions	2	Concern over lack of appropriate funding for the provision of emergency services on Port Lands.	GCT Deltaport has a comprehensive Emergency Response Plan that covers all potential major accidents and malfunctions, including defined strategies to prevent and mitigate environmental impacts associated with emergency events. GCT stress-tests the plans by conducting collaborative exercises with the City of Delta first responders. The design, construction and ongoing operation/maintenance of the Project will meet all stringent codes and standards requirements. All contractors will also be required to develop their own Emergency Response Plans that are aligned with and approved by GCT. Additionally, GCT has contracts with Quantum Murray Environmental (Emergency Response) and with Western Canada Marine Response Corporation (Transport Canada's Certified Marine Spill Response Organization) for 24-hour response, mitigation and clean-up in circumstances where there is potential for a hazardous spill or leak. The environmental assessment will consider the potential accidents and malfunctions that may occur due to the construction and additional operational aspects of the Project at GCT Deltaport, the potential effects of such incidents and mitigation measures that will be implemented as part of the Project's design.  Throughout the development of the Project, GCT will engage with Delta Police to ensure that their concerns are incorporated. As part of the Project, a new building for security will be added. GCT is dedicated to protecting both cargo and the harbour. All loaded imports and exports are kept in highly secured, monitored areas, with the VFPA providing security services outside of the terminal, and the Canadian Border Services Agency providing inspection of cargoes.	N/A

**TABLE C2: SUMMARY OF ISSUES RAISED AS IDENTIFIED IN THE JOINT SUMMARY OF ISSUES AND ENGAGEMENT.**

Topic	Number	High-level Summary of Issue	GCT Response	Addressed in the DPD
Species at Risk, Wildlife and their Habitat	1	Construction and operation will negatively affect wildlife, species at risk, and their habitat in the Project area, including as a result of harm and disturbance, changes in critical habitat, mortality or injury, reduced food source availability, and disruption in predatory/prey relationships.	The Impact Assessment will consider potential Project effects to wildlife, species at risk, and their habitat in the Wildlife Resources assessment including positive and negative effects. Opportunities to avoid, minimize, restore, compensate, or offset potential adverse effects have already been considered and will be further identified. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines for the Project. A first draft of the Joint Guidelines will be prepared by GCT and then submitted to IAAC and BCEAO who will tailor the document and consult on it with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuance of the final Joint Guidelines.	Section 7.2 Potential Effects in Relation to <i>Impact Assessment Act</i> Requirements Section 7.12 Determination of Potential Effects Section 7.13 Mitigation and Management Approaches
Species at Risk, Wildlife and their Habitat	2	Concern about road or rail infrastructure, increased capacity to existing linear transportation corridors, and increases in road or rail traffic that could result in increased wildlife injury/mortality.	The Impact Assessment will consider changes to road and rail transportation to/from GCT Deltaport. Potential Project effects to wildlife, species at risk, and their habitat will be considered in the Wildlife Resources assessment. The factors to be considered, and the scope of those factors, will be described in the joint Guidelines for the Project. A first draft of the Joint Guidelines will be prepared by GCT and then submitted to IAAC and BCEAO who will tailor the document and consult on it with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuance of the final Joint Guidelines.	Section 7.2 Potential Effects in Relation to <i>Impact Assessment Act</i> Requirements
Species at Risk, Wildlife and their Habitat	3	Sensory disturbances (noise, vibration, lighting) from construction and operation may cause changes to a species' movement, migration patterns, avoidance or attraction to an area.	The Impact Assessment will characterize sensory disturbances during construction and operation in the Noise and Vibration and the Light assessment sections. Potential effects of sensory disturbance to wildlife will be considered in the Wildlife Resources assessment. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines for the Project, and will be confirmed through additional engagement with Indigenous nations, stakeholders, the public, federal and provincial regulators.	Section 7.4.2 Noise, Vibration and Light Emissions Section 7.2.2 Migratory Birds
Species at Risk, Wildlife and their Habitat	4	Potential effects and proposed offset for overlap with Roberts Bank Wildlife Management Area.	Based on the current design the slope of the dredge pocket and crest protection overlaps the WMA by only approximately one hectare. GCT is evaluating design options to minimize the dredge area and to confirm if the WMA can be avoided while ensuring the safe operation of DP4. More broadly the Impact Assessment will consider potential Project effects to parks and protected areas and identify opportunities to avoid, minimize, restore, compensate, or offset potential adverse effects. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines for the Project. A first draft of the Joint Guidelines will be prepared by GCT and then submitted to IAAC and BCEAO who will tailor the document and consult on it with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuance of the final Joint Guidelines.	N/A
Transboundary	1	Inclusion of transboundary environments in assessment study areas.	The Joint Guidelines will describe spatial boundaries, including local and regional study areas for each VC included in assessing the potential adverse and positive environmental, health, social and economic effects of the Project. In some cases, spatial boundaries may extend to areas outside of Canada where transboundary effects (and potentially cumulative effects) are expected. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines for the Project. A first draft of the Joint Guidelines will be prepared by GCT and then submitted to IAAC and BCEAO who will tailor the document and consult on it with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuance of the final Joint Guidelines.	Section 7.11 Potential Cumulative Effects
Transboundary	2	Effects on fish and fish habitat from DP4 will have significant direct impacts for Indigenous people and their treaty rights in the US, especially as it relates to increased vessel movements in US shipping lanes and the effects on subsistence culture and spiritual ways of life.	Potential effects to Indigenous Interests as a result of effects to Indigenous rights to harvest, including fisheries, will be addressed in the Project assessment. Section 7.3 of the DPD will also contain a section that contains information about anticipated effects outside of Canada, including US waters from shipping activities. GCT welcomes ongoing engagement opportunities on this topic, including suggestions for habitat enhancement projects to understand these interconnections further, and to explore how they could be reflected in the Impact Assessment.	Section 7.3 Potential Environmental Effects on Federal Lands in a Province Other than the Province in which the Project is Proposed to be Carried Out or Outside Canada
Visual Environment	1	Concern for visual effects from anchorages and their resulting light and air emissions.	The Impact Assessment will require an assessment of potential visual and air quality impacts, that will consider those associated with vessel anchorages. The factors to be considered, and the scope of those factors will be described in the Joint Guidelines for the Project. A first draft of the Joint Guidelines will be prepared by GCT and then submitted to IAAC and BCEAO who will tailor the document and consult on it with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuance of the final Joint Guidelines.	Section 7.6 Potential Effects on Human Health and Community Wellbeing, Section 7.3 Potential Environmental Effects on Federal Lands in a Province Other than the Province in which the Project is Proposed to be Carried Out or Outside Canada
Visual Environment	2	Concern from visual effects from the Port, marine ships, and impacts to the health of communities.	The Impact Assessment will require an assessment of potential visual and human health impacts, including those associated with the proposed DP4 expansion at Deltaport and marine ships. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines for the Project. A first draft of the Joint Guidelines will be prepared by GCT and then submitted to IAAC and BCEAO who will tailor the document and consult on it with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuance of the final Joint Guidelines.	Section 7.6 Potential Effects on Human Health and Community Wellbeing

**TABLE C2: SUMMARY OF ISSUES RAISED AS IDENTIFIED IN THE JOINT SUMMARY OF ISSUES AND ENGAGEMENT.**

Topic	Number	High-level Summary of Issue	GCT Response	Addressed in the DPD
Transportation (Land)	1	Request that a traffic impact assessment be completed, and that road and rail be scoped into the assessment at a regional scale to address concerns about increased traffic and resulting light, noise and air pollution.	GCT has been operating at Deltaport since 1997 and understands the concerns raised about increased road and rail traffic. The Impact Assessment will require an assessment of air quality, noise, vibration and other factors associated with increased road and rail traffic, and the scope of the assessment will be confirmed by federal and provincial regulators following additional engagement with municipalities, Indigenous nations and other interested parties. Section 7.5 of the DPD confirms that a traffic impact assessment will be conducted to better understand changes in traffic volumes. The traffic impact assessment will be completed in collaboration with municipalities, Indigenous nations, the BC Ministry of Transport and Infrastructure, and rail companies.	Section 7.5 Potential Socio-economic Effects
Water Quality and Processes	1	Concern about effects of construction on water quality from on-site activities, in-water works, incidental activities (including oil, fuel, hazardous waste spills), dredging, deposition of soils and sediments to waterbodies via surface water run-off, and the deposition of wastewater, storm water, sanitary sewer, dust and particulates, affecting aquatic receptors such as fish, marine mammals, and aquatic plants. Increased discharges and waste will interact with perceptions on safety of harvested food.	The Impact Assessment will assess the potential effects of construction activities on environmental quality (i.e., water quality and sediment quality) and biological receptors. Planned mitigation and management measures, such as Environmental Protection Plans, will be considered as part of the assessment process. Residual effects, that remain after the application of mitigation and management measures, will be detailed and assessed. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines for the Project. A first draft of the Joint Guidelines will be prepared by GCT and then submitted to IAAC and BCEAO who will tailor the document and consult on it with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuance of the final Joint Guidelines.	Section 7 Potential Effects of the Project
Water Quality and Processes	2	Concern about crest protection and introduction of rock fill impacting sediment movement within the delta and surrounding areas, as well as eelgrass beds and other critical habitat processes like nutrient transfer.	The Impact Assessment will address potential direct (e.g., habitat within the footprint of proposed facilities) and indirect (e.g., alterations to habitat from changes in sediment movement) effects of the Project. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines for the Project. A first draft of the Joint Guidelines will be prepared by GCT and then submitted to IAAC and BCEAO who will tailor the document and consult on it with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuance of the final Joint Guidelines.	Section 7.2 Potential Effects in Relation to <i>Impact Assessment Act</i> Requirements
Water Quality and Processes	3	Clarity regarding the quantity of water that the Project will utilize, and how this may impact the City of Delta's municipal water forecasts.	As the Project design evolves, further clarity on the quantity of water the Project is expected to utilize will be determined. GCT will engage with the City of Delta regarding the forecasts for municipal water quantities once this level of information is determined. The Impact Assessment will include further details on the quantity of water and potential impacts to the City of Delta's municipal water forecasts.	Section 7.4.4 Solid, Liquid and Hazardous Waste
Wetlands	1	Concern for effects to critical staging and overwintering habitats for wildlife such as intertidal/subtidal wetlands, eelgrass, marsh, mudflats, and sand flats.	The Impact Assessment will consider potential Project effects on wildlife habitat in the Wildlife Resources assessment. Intertidal and subtidal habitats will be mapped and opportunities to avoid, minimize, restore, compensate, or offset potential adverse effects to critical habitats will be identified. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines for the Project. A first draft of the Joint Guidelines will be prepared by GCT and then submitted to IAAC and BCEAO who will tailor the document and consult on it with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuance of the final Joint Guidelines.	Section 7.2 Potential Effects in Relation to <i>Impact Assessment Act</i> Requirements Section 7.3 Potential Environmental Effects on Federal Lands in a Province Other than the Province in which the Project is Proposed to be Carried Out or Outside Canada
Wetlands	2	Geomorphological processes such as dendritic erosion, disturbance of natural sediment distribution processes, and wetland recession may increase as a result of additional industrial activity and engineered structures such as causeways and pilings.	The Impact Assessment will address potential issues associated with Project activities, including those associated with dendritic erosion, sediment distribution and wetland recession associated with the construction of the expanded causeway and other structures. The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines for the Project. A first draft of the Joint Guidelines will be prepared by GCT and then submitted to IAAC and BCEAO who will tailor the document and consult on it with Indigenous nations, stakeholders, the public, federal and provincial regulators prior to the issuance of the final Joint Guidelines.	Section 7.2 Potential Effects in Relation to <i>Impact Assessment Act</i> Requirements
Wetlands	3	Alteration of natural sedimentation processes may alter the natural water quality regime that supports habitat functions for migrating and overwintering birds (i.e., Biofilm) and lead to further degradation and loss of wetlands habitat for species as salmon and migratory birds.	GCT understands the ecological importance of Roberts Bank and has made efforts in the early design phase to minimizing construction on the east side of the causeway to limit impacts on biofilm and birds in the region. The Impact Assessment will include issues associated with water quality, wetland habitat and function, salmon, migratory birds and various other factors to inform regulatory decision making. The scope of these studies and the factors to be considered will be informed by additional engagement with Indigenous nations, the public, government agencies and stakeholders and ultimately confirmed by federal and provincial regulators.	Section 7.2 Potential Effects in Relation to <i>Impact Assessment Act</i> Requirements Section 7.3 Potential Environmental Effects on Federal Lands in a Province Other than the Province in which the Project is Proposed to be Carried Out or Outside Canada

**TABLE C2: SUMMARY OF ISSUES RAISED AS IDENTIFIED IN THE JOINT SUMMARY OF ISSUES AND ENGAGEMENT.**

Topic	Number	High-level Summary of Issue	GCT Response	Addressed in the DPD
Wetlands	4	Concern about the effectiveness of mitigation and remediation efforts as estuarine habitat restoration and compensation programs have suffered a very high failure rate and have not been successful in replacing/relocating hatchery areas, nesting areas, or aquatic migratory paths.	To ensure mitigation and compensation programs are effective, monitoring, follow-up reporting and adaptive management programs are generally required as a condition associated with project and permitting approvals. The Impact Assessment will inform where additional monitoring or adaptive management may be required to address the uncertainty associated with the predicted effectiveness of mitigation.	Section 7.13 Mitigation and Management Approaches Section 7.14 Monitoring

**TABLE C3: CITY OF RICHMOND INITIAL COMMENTS ON THE IPD.**

Number	Comment from City of Richmond	GCT Response	Addressed in the DPDs
1	There are currently a number of major projects (proposed and/or approved), at or near the Fraser River estuary including the RBT2, the Delta Grinding Facility Project, the Vancouver Airport Fuel Delivery Project and the George Massey Tunnel Replacement Project (Attachment 3). The City relies on the ecosystem functions of the Fraser River estuary to reduce the impacts of flooding and improve the community's quality of life. Recent updates under BC's <i>Environmental Assessment Act</i> and federal <i>Impact Assessment Act</i> have not been tested and have the potential to inadequately mitigate the long-term cumulative effects of climate change caused by DP4 and others. If the project proceeds Richmond expects GCT to fully assess the cumulative effects of DP4 in the context of all the major projects proposed in the Fraser River;	GCT understands that several major projects are been proposed/approved within the Fraser River estuary area. Section 7.11 of the DPD commits that "a cumulative effects assessment will be completed that considers the potential for residual effects of the Project on specific valued components (e.g., environmental, social, economic), combined with the effects of other past, current or reasonably foreseeable projects that overlap with the Project study areas." The projects and developments for inclusion in the cumulative effects assessment related to Valued Components (VCs) are typically determined by regulators, with input from groups such as Indigenous nations and stakeholders. GCT appreciates this feedback on the scope of the cumulative effects assessment for regulators' consideration. The cumulative effects assessment will be conducted in accordance with the guidance provided by the BC EAO and the IAAC and requirements under the BC <i>Environmental Assessment Act</i> and federal <i>Impact Assessment Act</i> . The Impact Assessment will also evaluate impacts of the environment on the project (including climate change impacts) and align with Environment and Climate Change Canada's requirements under the Strategic Assessment of Climate Change.	Section 7.11 Potential Cumulative Effects
2	The local and regional areas evaluated during the RBT2 assessment did not extend into the municipal limits of the City of Richmond for various components including traffic. The City of Richmond expects that if DP4 proceeds to environmental assessment, the City of Richmond will be included in the assessment of valued components, as appropriate, to better understand how impacts including traffic, noise, light, air and visual quality, wave effects, accidents and malfunctions will be managed by GCT and mitigated to reduce possible impacts to the community;	GCT acknowledges City of Richmond's request and will engage with the City of Richmond to better understand issues of concern and how that may be addressed through the DP4 assessment process. The factors to be considered in the DP4 assessment, and the scope of those factors (including spatial boundaries) will ultimately be defined by regulators and informed through formal engagement led by the EAO and IAAC on their Joint Guidelines document.	N/A
3	The wake, from increased marine traffic, needs to be assessed for wave energy, amplitude and cumulative effects as related to the City's flood protection infrastructure. Future analysis should also include a scenario whereby both RBT2 and DP4 are fully operational;	Based on multiple independent studies, GCT's own operational and market experience, and taking into account existing, approved known container capacity expansion projects on the West Coast of Canada, 2.0M to 2.4M additional capacity will be required sometime in the 2030s. This finding is further supported by the publicly available Black Quay study which is referenced in Section 10 in the DPD.  The factors to be considered, and the scope of those factors, will be described in the Joint Guidelines for the Project and will be confirmed through additional engagement with Indigenous groups, stakeholders, the public, federal and provincial regulators.	Section 1.3.2. Need for the Project and Rationale Section 1.3.3 Project Benefits Section 3.8 Alternatives to the Project
4	The need for increased containerized cargo volumes is driven by the growth in the regional population, trade and economic development. This will generate increased demand for industrial lands in Metro Vancouver, including large trade-oriented parcels, as well as land supporting general light industrial activities that are part of the international and inter-provincial trade and logistics supply-chain sector, such as local manufacturers, warehouse/distribution, transshipment, and brokers. The City seeks to understand how additional container cargo capacity may impact existing Metro Vancouver projections for the absorption of industrial land in the region;	GCT understand the City's interest in understanding how additional container cargo capacity may impact existing industrial land in the region, however, land zoning and land management are outside of GCT's care a control. The development of the Project is timed to meet forecasts for growth, and it is anticipated that GCT's proposed approach to incrementally expand its operations at Deltaport is less likely to present unforeseen impacts on industrial land. GCT is open to engaging with the City of Richmond and relevant land use planning authorities to discuss this and other issues in the future.	Section 1.3 Project Purpose, Need, and Rationale
5	An independent assessment of total cargo/berthing needs to confirm the GCT's assessment. Future analysis should also include a scenario whereby both RBT2 and DP4 are fully operational;	GCT appreciates the City of Richmond's comments and will consider an independent assessment of total cargo/berthing. It is unlikely that both the Project and RBT2 would be developed in the foreseeable future as it would provide unreasonably excessive container capacity and thus unlikely to facilitate a business case for it. Section 7.11 of the DPD commits that "a cumulative effects assessment will be completed that considers the potential for residual effects of the Project on specific valued components (e.g., environmental, social, economic), combined with the effects of other past, current or reasonably foreseeable projects that overlap with the Project study areas." The cumulative effects assessment will be conducted in accordance with the guidance provided by the BC EAO and the IAAC and requirements under the BC <i>Environmental Assessment Act</i> and federal <i>Impact Assessment Act</i> .	Section 3.8 Alternatives to the Project Section 7.11 Potential Cumulative Effects
6	GCT's proposed project should align with Metro Vancouver's 2040 Regional Growth Strategy;	GCT believes that the Project's incremental approach, focus on densification and intensification of land use is aligned with Metro Vancouver's 2040 Regional Growth Strategy and the objectives of the Strategy such as supporting the region's economy and reducing greenhouse gas emissions.	Section 4.2 Planning Context and Zoning
7	It is unclear if the City's road network will be impacted from increased truck movements as a result of DP4. If the project proceeds, impacts to regional roadways is required to be assessed including a Traffic Impact Assessment and a Transportation Management Plan are required for the City's review to determine if possible transportation improvements and/or mitigation are needed, should DP4 proceed. Given the forecasted increase in vehicle movements, the project should not proceed until the long-term improvements to the George Massey Crossing are complete;	GCT acknowledges the City's concerns about impacts to regional roadways but does not have care and control over the roads or rail outside of its lease boundary, or the ability to influence decisions or timelines associated with long-term improvements to the George Massey Crossing. However, GCT is collaborating with municipal governments, Indigenous nations, the BC Ministry of Transport and Infrastructure, and the rail companies, amongst others, through the Gateway Transportation Collaboration Forum to confirm any improvements that may be required to the network as a result of the proposed container terminal expansion projects at Roberts Bank. GCT will continue this collaboration throughout the DP4 assessment process.	Section 3.4.4 Physical Activities Incidental to the Project

**TABLE C3: CITY OF RICHMOND INITIAL COMMENTS ON THE IPD.**



Number	Comment from City of Richmond	GCT Response	Addressed in the DPDs
8	The City understands that GCT is currently considering short-sea shipping as a project component. The City is interested in understanding how short-sea shipping can be implemented, through further analysis, to reduce regional truck movements;	As explained in the DPD Section 3.4.4, a short sea shipping berth is being considered for inclusion into the Project, as marine shipping of containers on barges along the coast aligns with federal government initiatives and Metro Vancouver plans, and GCT's objective to increase operational efficiency and reduce impacts of truck transportation from GCT Deltaport. Short sea shipping is estimated to be 3.7 times more fuel-efficient than transportation by truck (Metro Vancouver, 2020a) which in turn leads to reduced fuel costs and consumption, reduced GHG emissions, less noise and air pollution. Short Sea Shipping would not be expected to affect the volume of containers or the size of the ships calling at GCT Deltaport and therefore there will be no increase in marine shipping should the short sea shipping berth not be constructed. Different stakeholders have suggested inclusion or exclusion of the short sea shipping capability into the Project.	Section 3.4.4 Physical Activities Incidental to the Project
9	DP4 is proposed in an ecologically sensitive area. The City seeks to understand how adverse impacts to the marine environment, species at risk, critical habitat, birds, marine animals can be avoided during the construction and operations stage should the DP4 proceed;	The Impact Assessment will assess the effects of project activities on the marine environment, species at risk, critical habitat, birds, and marine species and there will be opportunities for the City to engage and increase their understanding of these issues as the process unfolds. Based on early environmental studies, the Project location is considerate of Indigenous crabbing grounds and particularly focused on avoiding disruption to biofilm which is important for migratory birds.	Section 7 Potential Effects of the Project
10	The site is currently located on land in the City of Delta that is designated for industrial uses. If the project proceeds, land outside of the proposed project footprint and within the provincial Agricultural Land Reserve should not be developed to support construction or staging activities;	Under the proposed DP4 expansion GCT has no plans to negatively impact surrounding farmland in the Provincial Agricultural Land Reserve (ALR) as the lands required to expand are not within or subject to the BC ARL. GCT understands that the VFPA has recently acquired provincial ALR lands and has the option to develop those lands in the future.	Section 7.5 Potential Socio-economic Effects
11	More information is required to ensure that induced tanker traffic will not pose a risk to the community and Fraser River in terms of spills, accidents, malfunctions and potential security breaches;	GCT Deltaport nor DP4 expansion handle tanker traffic. GCT only handles container vessels. In accordance with the <i>Impact Assessment Act</i> Section 22(1)(a)(i) and the <i>BC Assessment Act</i> Section 25(2)(c), DP4 will require an assessment of accidents and malfunctions that will describe potential incidents in all phases of the Project including spills, allisions and collisions with other ships and assess the likelihood of each incident occurring and consequence of each incident.	Section 7.9. Public and Environmental Safety
12	More information is required regarding proposed low-carbon technologies including grid electricity, green hydrogen, and biodiesel, which also support broader policy and regulatory direction in Canada (and BC) regarding the transition from fossil fuels.	GCT is committed to reducing and avoiding GHG emissions where possible throughout the advancement of the Project. The use of low carbon technologies and electric equipment are some of the key opportunities GCT will consider as the Project design progresses. The Impact Assessment will describe the best available technologies to mitigate GHG emissions from the Project and address the extent to which the effects of the Project hinder or contribute to BC and Canada's environmental obligations and climate change commitments. To find out more about GCT's Global Commitment please visit: <a href="https://globalterminals.com/globalcommitment/">https://globalterminals.com/globalcommitment/</a>	Section 7.4.3. Greenhouse Gas Emissions

## **APPENDIX D**

### **SPECIES AT RISK**

## APPENDIX D: SPECIES AT RISK

Biota	English Name	Scientific Name	BC Conservation Status list	Species At Risk Act Status	Committee On the Status of Endangered Wildlife In Canada
Marine fish	Eulachon	<a href="#">Thaleichthys pacificus</a>	Blue	-	Endangered/Threatened
Marine fish	Green Sturgeon	<a href="#">Acipenser medirostris</a>	Blue	Special Concern	Special Concern
Marine fish	Longfin Smelt	<a href="#">Spirinchus thaleichthys</a>	Blue	-	-
Marine fish	White Sturgeon (Fraser River population)	<a href="#">Acipenser transmontanus</a>	Red	Endangered	Endangered/Threatened
Marine invertebrate	Olympia Oyster	<a href="#">Ostrea lurida</a>	Blue	Special Concern	Special Concern
Marine Mammal	Fin Whale	<a href="#">Balaenoptera physalus</a>	Red	Threatened	Special Concern
Marine Mammal	Grey Whale	<a href="#">Eschrichtius robustus</a>	Blue	Special Concern	Special Concern/Endangered/Not at Risk
Marine Mammal	Harbour Porpoise	<a href="#">Phocoena phocoena</a>	Blue	Special Concern	Special Concern
Marine Mammal	Humpback Whale	<a href="#">Megaptera novaeangliae</a>	Blue	Special Concern	Special Concern
Marine Mammal	Killer Whale (Northeast Pacific Northern Resident Population)	<a href="#">Orcinus orca pop. 6</a>	Red	Threatened	Threatened
Marine Mammal	Killer Whale (Northeast Pacific Offshore Population)	<a href="#">Orcinus orca pop. 2</a>	Red	Threatened	Threatened
Marine Mammal	Killer Whale (Northeast Pacific Southern Resident Population)	<a href="#">Orcinus orca pop. 5</a>	Red	Endangered	Endangered
Marine Mammal	Killer Whale (Northeast Pacific Transient Population)	<a href="#">Orcinus orca pop. 3</a>	Red	Threatened	Threatened
Marine Mammal	North Pacific Right Whale	<a href="#">Eubalaena japonica</a>	Red	Endangered	Endangered
Marine Mammal	Northern Elephant Seal	<a href="#">Mirounga angustirostris</a>	Red	-	Not at Risk
Marine Mammal	Northern Fur Seal	<a href="#">Callorhinus ursinus</a>	Red	-	Threatened
Marine Mammal	Sea Otter	<a href="#">Enhydra lutris</a>	Blue	Special Concern	Special Concern
Marine Mammal	Sperm Whale	<a href="#">Physeter macrocephalus</a>	Blue	-	Not at Risk
Marine Mammal	Steller Sea Lion	<a href="#">Eumetopias jubatus</a>	Blue	Special Concern	Special Concern
Marsh Bird	Great Blue Heron, fannini subspecies	<i>Ardea herodias fannini</i>	Blue	Special Concern	Special Concern
Passerines	Band-tailed Pigeon	<i>Patagioenas fasciata</i>	Blue	Special Concern	Special Concern
Passerines	Bank Swallow	<i>Riparia riparia</i>	Yellow	Threatened	Threatened
Passerines	Barn Swallow	<i>Hirundo rustica</i>	Blue	Threatened	Special Concern
Passerines	Common Nighthawk	<i>Chordeiles minor</i>	Yellow	Threatened	Special Concern
Passerines	Olive-sided Flycatcher	<i>Contopus cooperi</i>	Blue	Threatened	Special Concern
Passerines	Purple Martin	<i>Progne subis</i>	Blue	-	-
Passerines	Rusty Blackbird	<i>Euphagus carolinus</i>	Blue	Special Concern	Special Concern
Passerines	Vesper Sparrow, affinis subspecies	<i>Pooecetes gramineus affinis</i>	Red	Endangered	Endangered
Raptors	Barn Owl	<i>Tyto alba</i>	Red	Threatened	Threatened
Raptors	Peregrine Falcon, anatum subspecies	<i>Falco peregrinus anatum</i>	Red	Special Concern	Not at Risk
Raptors	Rough-legged Hawk	<i>Buteo lagopus</i>	Blue	-	Not at Risk
Raptors	Short-eared Owl	<i>Asio flammeus</i>	Blue	Special Concern	Threatened
Rare plant	Henderson's checker-mallow	<i>Sidalcea hendersonii</i>	Blue	-	-



## APPENDIX D: SPECIES AT RISK

Biota	English Name	Scientific Name	BC Conservation Status list	Species At Risk Act Status	Committee On the Status of Endangered Wildlife In Canada
Rare plant	Vancouver Island beggarticks	<i>Bidens amplissima</i>	Blue	Special Concern	Special Concern
Seabirds and Seaducks	Ancient Murrelet	<i>Synthliboramphus antiquus</i>	Blue	Special Concern	Special Concern
Seabirds and Seaducks	Brandt's Cormorant	<i>Phalacrocorax penicillatus</i>	Red	-	-
Seabirds and Seaducks	California Gull	<i>Larus californicus</i>	Blue	-	-
Seabirds and Seaducks	Caspian Tern	<i>Hydroprogne caspia</i>	Blue	-	Not at Risk
Seabirds and Seaducks	Common Murre	<i>Uria aalge</i>	Red	-	-
Seabirds and Seaducks	Double-crested Cormorant	<i>Phalacrocorax auritus</i>	Blue	-	Not at Risk
Seabirds and Seaducks	Marbled Murrelet	<i>Brachyramphus marmoratus</i>	Blue	Threatened	Threatened
Shark	Basking Shark	<a href="#"><u><i>Cetorhinus maximus</i></u></a>	No Status	Endangered	Endangered
Shorebirds	Red Knot	<i>Calidris canutus</i>	Red	Threatened/Endangered	Endangered/Threatened
Shorebirds	Short-billed Dowitcher	<i>Limnodromus griseus</i>	Blue	-	-
Shorebirds	Whimbrel	<i>Numenius phaeopus</i>	Red	-	-
Waterfowl	Black Scoter	<i>Melanitta americana</i>	Blue	-	-
Waterfowl	Brant	<i>Branta bernicla</i>	Blue	-	-
Waterfowl	Canada Goose, occidentalis subspecies	<i>Branta canadensis occidentalis</i>	Red	-	-
Waterfowl	Eared Grebe	<i>Podiceps nigricollis</i>	Blue	-	-
Waterfowl	Long-tailed Duck	<i>Clangula hyemalis</i>	Blue	-	-
Waterfowl	Surf Scoter	<i>Melanitta perspicillata</i>	Blue	-	-
Waterfowl	Tundra Swan	<i>Cygnus columbianus</i>	Blue	-	-
Waterfowl	Western Grebe	<i>Aechmophorus occidentalis</i>	Red	Special Concern	Special Concern

## **APPENDIX E**

# **GREENHOUSE GASES MEMO**

# Greenhouse Gas Emissions Quantification GCT DP4 Detailed Project Description (DPD)

August 31, 2020 (Revised: July 3, 2021)

## Introduction

Global Container Terminals (GCT) is currently proposing the GCT Deltaport Expansion, Berth Four Project (DP4 or the Project). The DP4 Project will increase GCT's container capacity by 2.0 million Twenty-Foot-Equivalent Units (TEUs) per year. The Project will be located at Roberts Bank, in the City of Delta, British Columbia, adjacent to the existing GCT Deltaport.

GCT has a track record of sustainability excellence and greenhouse gas (GHG) emissions reductions which it will extend to the DP4 Project design and operations. GCT's achievements include achieving high marks in the Green Marine certification system for all its terminals and achieving an average annual reduction of 3.3% in GHG emissions intensity (per TEU) across its Canadian operations. GCT also measures its carbon footprint and calculates emission as per the GHG Protocol<sup>1</sup> and is Climate Smart Certified

## GHG emissions calculation overview

The DP4 Project will generate greenhouse gas (GHG) emissions during construction, operations and maintenance and (if necessary) decommissioning. While these emissions are additional to current operating conditions, the Project will lower emissions relative to other base case options required to meet necessary increases in demand for container terminal capacity in western Canadian ports.

Initial GHG emissions from the Project are estimated following the requirements of the Strategic Assessment of Climate Change (SACC)<sup>2</sup>. The assessment captures:

1. Total emissions from the Project
2. Emissions avoided by the Project
3. Steps the Project is taking to reduce emissions

To estimate avoided emissions, the assessment estimates changes in emissions relative to emissions that would occur in the absence of the Project (i.e. a base case or business as usual scenario). SACC incorporates Infrastructure Canada's Climate Lens<sup>3</sup> for guidance on estimating for avoided emissions.

According to the Climate Lens, section 2.5(i), "assessments should establish a baseline or business-as-usual (BAU) emissions trajectory which will form the baseline scenario representative of the most probable emissions in the absence of the proposed project (this is sometimes also known as a 'counterfactual' scenario). This baseline depicts the emissions trajectory in the absence of the proposed project... The net increase or decrease in emissions linked to the proposed project will be calculated against this baseline." In selecting the baseline, the proponent could consider "Expectations regarding the

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<sup>1</sup> The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (World Resources Institute/World Business Council - Revised Edition)

<sup>2</sup> <https://www.strategicasessmentclimatechange.ca/15112/widgets/61020/documents/36886>

<sup>3</sup> <https://www.infrastructure.gc.ca/pub/other-autre/cl-occ-eng.html>

infrastructure's immediate and future service outputs; whether the BAU enables the assessment to capture emission reductions linked to new process and/or system efficiencies implemented under the project scenario;" and "whether the selected BAU scenario represents the most conservative viable alternative to the project."

The approach used to establish the Project and base case boundaries and emissions estimates are consistent with the Climate Lens guidance above as well as ISO 14064-2:2019<sup>4</sup>, and the GHG Protocol for Project Accounting<sup>5</sup>.

GHG emission sources, sinks and reservoirs include direct emissions (scope 1) and indirect energy emissions (scope 2). The GHGs considered in the process include carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>) and nitrous oxide (N<sub>2</sub>O), converted into CO<sub>2</sub> equivalent units (tCO<sub>2</sub>e). The boundary of the assessment is defined in line with the Detailed Project Description (DPD). It currently excludes physical activities incidental to the Project which are outside of the Proponent's operational control such as indirect emissions (scope 3) from ship, rail and truck freight that will use the expanded terminal facilities. The boundary of the GHG assessment aligns with the boundaries of Environment Canada's Strategic Assessment of Climate Change and may be expanded beyond the Project footprint if required in subsequent stages of project development. Furthermore, an upstream GHG assessment will be completed if the Project's supply chain emissions are determined to exceed 500,000 tCO<sub>2</sub>e per year.

The approach follows the principles of GHG Project Accounting as recommended by the Climate Lens, which is used to guide the GHG quantification of the Project, and ensure that the DP4 Project represents a faithful, true and fair account of its total and net GHG emissions:

- **Relevance:** this initial GHG emissions estimate addresses the DPD requirements of the Strategic Assessment of Climate Change and is intended to support internal and external stakeholders including government agencies in their decision-making and evaluation of the Project
- **Completeness:** GCT accounts for all relevant GHG sources, sinks and reservoirs (SSRs) within the Project boundary, along with information to support criteria and procedures
- **Consistency:** The methodologies and assumptions used to estimate and calculate Project case, "base case" and net GHG emissions are consistent with each other and industry best practices to ensure meaningful comparisons between the base case and the Project
- **Accuracy:** The quantification process is conducted with the objective of identifying and minimizing areas of uncertainty to the extent possible given current project information
- **Transparency:** the GHG summary is prepared in a coherent manner and relevant methodologies, assumptions, estimations and omissions are disclosed
- **Conservativeness:** the GHG summary uses relevant methodologies, assumptions and estimations to ensure that GHG emissions reductions are not over-estimated.

## Project and base case description

### Project description

The DP4 Project will be located adjacent to the existing Deltaport terminal at Roberts Bank, between the Roberts Bank Way and Tsawwassen Ferry Terminal causeways. The Project will increase the capacity of

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<sup>4</sup> ISO 14064-2:2019 – Greenhouse gases – Part 2: Specification with guidance at the project level for quantification, monitoring and reporting of greenhouse gas emission reductions or removal enhancements

<sup>5</sup> The Greenhouse Gas Protocol for Project Accounting (World Resources Institute/World Business Council - Revised Edition)



the existing GCT Deltaport facilities and is designed to be constructed in the intertidal and subtidal marine waters to the northeast of the existing facilities.

During design, GCT plans to investigate opportunities to reduce GHG emissions from operations beyond levels observed at modern container terminals. These include electrification of cargo handling equipment, reduction in the number of specific equipment and evaluating lower emission fuel sources to the extent commercially feasible. This will allow the Project to contribute to the Northwest Ports Clean Air Strategy and Port of Vancouver's vision to be the world's most sustainable port.

### **Base case description**

The base case scenario represents the GHG emissions scenario that would take place in the absence of the Project. Given the forecasted shortfall in terminal capacity at Western Canadian ports, a reasonable scenario in the absence of the Project is that another expansion project will be constructed to meet growing demand. Other Project alternatives include increasing container shipments using existing capacity, which is not technically feasible, or building an entirely new terminal, which is not economically feasible. As a result, the most feasible way of meeting the expected increase in container demand is through an expansion project at another existing terminal facility.

The base case scenario assumes that existing and forecasted Deltaport operations are representative of the operations of a modern terminal. As such, the GHG emissions during operations for the base case are calculated using historic data from Deltaport. The base case scenario also considers operational efficiencies over time, such as reduced idling time of GCT vehicles, more efficient engine replacement and procurement, impacts of biofuel blends, increased utilization of propane fuel, and other retrofits.

Construction emissions in the base case are modeled as equivalent to the construction estimates from the Project. There is no current decommissioning plan, however if one is required the associated emissions will be estimated.

The base case scenario is selected to align with the GHG accounting principles of conservativeness and consistency. The base case is conservative because it assumes an expansion project which is lower cost and impact than constructing a new facility, resulting in lower anticipated emissions. It is consistent with the Project case because it uses data from existing Deltaport operations as opposed to GHG emissions from another operation where GCT does not have the same level of assurance that the data represents equivalent project capacities and boundaries.

### Implications of a "Do Nothing" base case interpretation

The base case scenario above represents the most technically and economically feasible scenario most likely to occur in the absence of the project. Alternatively, the Project can be compared to a "do nothing" scenario. Under this interpretation, emissions in the base case scenario become zero and the following occurs:

- Net emissions reported below become equal to the total emissions from the Project
- Avoided GHG emissions reported below become GHG reductions achieved relative to a replacement project

A "do nothing" scenario is unlikely to occur given that additional terminal capacity is required to meet forecasted demand for container shipping in Western Canada.



### **Avoided GHG emissions**

The Project will aim to avoid or reduce emissions relative to another port expansion by investigating best achievable technology to switch from fossil fuel equipment to low-carbon fuels, hybrid and electric equipment and reduce energy consumption through efficient operations and management systems. Specifically, the following measures will be investigated to support GHG reductions and are factored into the Project's GHG emissions profile:

- Electrified yard cranes
- Hybrid, electric and/ or battery-powered container handlers and light-duty vehicles

The Project will also lessen emissions from GHG sources not owned or controlled by GCT, including marine shipping, truck and rail locomotive emissions. These activities are currently not included in the boundaries of the DPD but help contribute to Canada's emission reduction goals by forecasting to reduce indirect emissions from the following activities:

- Offer ships access to shore power, reducing the need to burn fuel while at berth
- Accommodate larger ships to use the terminal, reducing the number of ships needed to transport goods
- Layout and configuration improvements to reduce travel distances for container transport equipment
- Market greater capacity to load containers onto rail as opposed to road, thereby reducing emissions required to transport goods via over-the-road trucks to and from the terminal
- Reduce truck idling time by improving truck flows and travel distances and managing an improved and robust container reservation system
- Adding ship capacity through berth 4 will further optimize rail yard and will be an attractive proposition to global shipping alliances (bigger ships, less calls)

### **Construction, land-use change and carbon sinks and reservoirs**

Construction will involve land-use change including dredging and in-filling. The release of organic matter during dredging could lead to a source of GHG emissions and reduce the annual sequestration potential of reservoirs. These effects are not anticipated to significantly contribute to GHG emissions during construction or operations of the Project.

To evaluate impacts of land-use change on carbon sinks and reservoirs, the impact of dredging activities on native eelgrass habitat present within the Project footprint was investigated. Eelgrass is a carbon reservoir that sequesters carbon as it grows. Based on the sequestration effect of eelgrass (0.42 tCO<sub>2</sub>e ha<sup>-1</sup> yr<sup>-1</sup>)<sup>6</sup> and the area of dredging required for the Project, we estimate dredging will reduce the sequestration potential of existing eelgrass by 18 tCO<sub>2</sub>e/yr. This amount is much less than 1% of annual emissions from the project and below a reasonable materiality threshold.

Disturbing soil during dredging can also lead to the release of GHG emissions. The potential influence of carbon content of sediments and marine vegetation will be investigated as the project develops. Furthermore, GCT intends to compensate for eelgrass habitat removed during dredging. This will act to mitigate any negative consequences on GHG emissions resulting from dredging.

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<sup>6</sup> Oreska et al., 2020 (<https://www.nature.com/articles/s41598-020-64094-1>)



## GHG emissions estimate

Table 1 shows the preliminary GHG estimates for the Project and base case and the net GHG emissions between them. Net GHG emissions are the emissions reduced by the Project relative to the base case. In this assessment, all emissions from the Project and base case occur within Canada. Note that the net GHG emissions between the Project and Base case during construction is zero as we have not modeled any improvements in construction methods. This may be updated as design and construction schedules progress.

**Table 1: Estimated average GHG emissions for direct (scope 1) and indirect energy (scope 2)\***

Phase	Duration	Base case emissions	Project scenario emissions	Net or relative GHG emissions
Construction	4 years	42,778 tCO <sub>2</sub> e/y	42,778 tCO <sub>2</sub> e/y	0 tCO <sub>2</sub> e/y
Operation and maintenance	> 50 years*	7,381 tCO <sub>2</sub> e/y	2,988 tCO <sub>2</sub> e/y	-4,393 tCO <sub>2</sub> e/y
Decommissioning	N/A	N/A	N/A	0 tCO <sub>2</sub> e
Total	> 50 years*	13,281 tCO <sub>2</sub> e/y	9,620 tCO <sub>2</sub> e/y	-3,561 tCO <sub>2</sub> e/y

\* Annual average emissions are based on construction from 2027-2030 (4 years) and operations from 2031-2050 (20 years). Note the project is anticipated to operate well beyond 2050.

Table 2 below presents the estimated GHG emission intensity for the operation and maintenance phase and the annual GHG emissions average.

**Table 2: Estimated GHG emission Intensity\***

Phase	Container shipments (TEU/yr)	Base case (kgCO <sub>2</sub> e/TEU)	Project scenario (kgCO <sub>2</sub> e/TEU)	Net or relative difference (kgCO <sub>2</sub> e/TEU)
Operation and maintenance, excluding construction	758,785	9.7	3.9	-5.8
Operation and maintenance, including construction	758,785	21.0	15.2	-5.8

\* Production and emissions intensities are based on construction from 2027-2030 (4 years) and operations from 2031-2050 (20 years). Note the project is anticipated to operate well beyond 2050.



Table 3 presents the maximum annual GHG emissions occurring during each phase of the Project. Maximum emissions during operations are estimated based on maximum design capacity. GHG results for each year of construction and operations up to 2050 is presented in Appendix A. Note that the terminal is not projected to operate at design capacity within this study period.

**Table 3: Maximum annual GHG emissions\***

GHG emission element	Construction (Max = 2027)	Operation and maintenance (At max capacity)
Direct GHG emissions (scope 1), tCO <sub>2</sub> e	42,778	7,468
Acquired energy GHG emissions (scope 2), tCO <sub>2</sub> e		407
CO <sub>2</sub> captured and stored, tCO <sub>2</sub> e	0	0
Avoided domestic GHG emissions, tCO <sub>2</sub> e**	- 42,778	-19,447
Offset credits, tCO <sub>2</sub> e	0	0
Net GHG emissions, tCO <sub>2</sub> e**	0	-11,571
GHG intensity Project, kgCO <sub>2</sub> e/TEU	N/A	3.9
GHG intensity net / reduced, kgCO <sub>2</sub> e/TEU**	N/A	-5.8

\* Maximum annual emissions are based on construction from 2027-2030 (4 years) and operations from 2031-2050 (20 years). Note the project is anticipated to operate well beyond 2050. Maximum emissions during operations is based on full design capacity, which is above the levels projected in the 2031-2050 study period.

\*\* Net and avoided GHG emissions are relative to the base case scenario.

Based on the initial estimate above and aligning with the Strategic Assessment of Climate Change, the project is anticipated to:

- Generate 230,869 tCO<sub>2</sub>e total emissions including construction, operations and decommissioning, equivalent to 9,620 tCO<sub>2</sub>e per year over the life of the project up to 2050
- Produce 87,866 tCO<sub>2</sub>e less total emissions relative to an alternative project required to meet increasing container terminal demand among Canadian west coast ports, equivalent to 3,561 tCO<sub>2</sub>e/yr per year over the life of the project up to 2050

The above figures correspond to direct emissions and purchased energy.

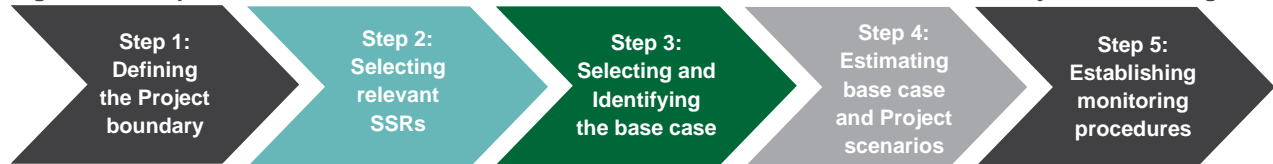




## Description of GHG calculation methodology, assumptions and emission factors

The GHG estimate followed a five step process (Figure 1) to select the appropriate methodologies and assumptions, select relevant sources, select and identify the baseline, calculate and estimate net GHG emissions and establish the monitoring procedures, and compilation of the GHG assessment report.

Figure 1: DPD process in accordance with ISO 14064-2:2019 and the GHG Protocol for Project Accounting



The assessment considers scope 1 and scope 2 emission sources from the Project. Note that only emissions or removals from within Canada are considered. A description of each scope is described below:

- **Direct GHG emissions (scope 1)** – GCT reports emissions from owned or controlled sources. Scope 1 emissions are from stationary combustion (fuel consumption by equipment) and mobile combustion (fuel consumption for transporting goods and people).
- **Acquired energy GHG emissions (scope 2)** – GCT reports scope 2 emissions and removals from purchased energy (i.e. electricity). Scope 2 emissions are calculated using current and projected BC grid emissions factors.
- **Avoided domestic GHG emissions** – GCT projects to generate less GHG emissions than what would likely occur in the absence of the Project (i.e. relative to a base case scenario).
- **Offset credits** - The Project may consider purchasing offsets as part of its GHG strategy and to help meet Canada’s GHG reduction goals. At this time, offsets have not been included in the emissions estimate

GHG emissions were estimated through identifying emissions sources associated with the project and base case. Total emissions are calculated as the sum of all emissions from each source. The formulae used to calculate emissions associated with each activity were:

$$Direct\ GHG\ emissions_{Construction} = Construction\ costs * emissions\ factor_{construction}$$

$$Direct\ GHG\ emissions_{operations} = Direct\ GHG\ emissions\ intensity_{operations} * TEU\ volume$$

$$Direct\ GHG\ emissions\ intensity_{operations} = \frac{(Equipment\ quantity * operating\ hours * fuel\ burn\ rate * energy\ emissions\ factor)}{TEU\ volume}$$

$$Acquired\ GHG\ emissions_{operations} = Acquired\ GHG\ emissions\ intensity_{operations} * TEU\ volume$$

$$Acquired\ GHG\ emissions\ intensity_{operations} = \frac{(Equipment\ quantity * operating\ hours * electricity\ use\ rate * BC\ provincial\ grid\ emissions\ factor)}{TEU\ volume}$$



The assessment calculated emissions from construction and operations for the Project and Base Case:

- Construction emissions for the Project and Base Case are assumed to be equal and estimated using a spend-line emission factor and forecasted construction costs for the Project.
- Operations emissions from the Base Case considers historical Deltaport emissions and a 3.3% per year efficiency improvement through 2030.
- Operations emissions for the Project incorporates the forecasted Base Case improvements as well as partial electrification of cranes, tractor-trailers, rail tractors and pick-up trucks used on site to the extent commercially feasible.

Emission factors and conversion sources are from reputable government sources, including:

- The 2020 Government of Canada National Inventory Report (NIR) for British Columbia grid electricity, propane diesel and other fuels
- Energy Star Portfolio Manager Technical Reference 2015 for energy conversion factors
- UK Department for Environment, Food and Rural Affairs for construction emission factor
- Propane and diesel emission factors from the 2020 Government of Canada NIR

Total global warming potential (GWP) values from the IPCC's 4th Assessment Report (AR4) are used. These are consistent with the GWPs used in the most recent Government of Canada National Inventory Report.

### **Sources of uncertainty**

The GHG estimation for the Project is preliminary and therefore has a high level of uncertainty. The largest areas of uncertainty include construction-related emissions, project design, equipment selection and production forecast. As these are further refined during project development, the GHG model can be updated to include more detailed information, including detailed construction activities, detailed design/engineering and finalized equipment selection and specifications.

Moreover, actual GHG emissions can be monitored and calculated during construction and operations by tracking energy purchases. Note construction and operations GHG emissions can be distinguished from one another by monitoring fuel usage and operating time at an equipment-level.

### **Next steps**

This report presents initial GHG estimates. GCT will continue to refine this working model during preparation of the Impact Assessment, including:

- Refining GHG calculations as more detailed Project design information becomes available
- Systematically reviewing additional GHG mitigating technologies and approaches for design, construction and operations
- Expanding documentation of other GHG benefits including indirect benefits on marine, truck and rail transportation in Canada



In particular, construction activities represent the largest source of GHG emissions and highest uncertainty in the GHG estimate. As part of the Impact Assessment, additional design information and potential reduction measures will be considered for construction, including estimates of fuel used by equipment, and estimation of the potential impact of soils moved during dredging.

GCT will continue to explore the potential for achieving carbon neutrality and net-zero emissions by 2050 through on-site reduction measures and purchasing offsets. In future, the Project can aim to further reduce emissions where possible by:

- Increasing electrification of equipment - currently the GHG estimate models partial electrification and fuel switching. Full electrification would reduce on-site GHG emissions to ultra-low levels
- Investigating best achievable technologies and project alternatives to reduce emissions
- Planning to replace capital equipment at end of life with best achievable technologies at time of replacement
- Purchasing local and high-quality offsets to compensate for remaining emissions



## Appendix A – Base case and project scenario emissions

Table A1 presents the base case and project scenario estimated GHG emission per year and reports the annual emissions reduced. The study period forecasts GHG emissions to 2050. The terminal is expected to operate in perpetuity and well beyond 2050.

**Table A1: Base case and project scenario emissions and removals calculations per year**

Year	Production forecast (TEU/yr)	Base case emissions (tCO <sub>2</sub> e)	Project scenario emissions	Net or mitigated emissions (tCO <sub>2</sub> e)
2027	0	42,778	42,778	0
2028	0	42,778	42,778	0
2029	0	42,778	42,778	0
2030	0	42,778	42,778	0
2031	194,736	1,959	767	-1,192
2032	246,252	2,394	970	-1,425
2033	298,952	2,907	1,177	-1,730
2034	352,864	3,431	1,389	-2,042
2035	408,016	3,967	1,607	-2,361
2036	464,437	4,516	1,829	-2,687
2037	522,155	5,077	2,056	-3,021
2038	581,201	5,651	2,289	-3,363
2039	641,605	6,239	2,526	-3,712
2040	703,398	6,839	2,770	-4,070
2041	766,613	7,454	3,019	-4,435
2042	831,281	8,083	3,273	-4,809
2043	897,437	8,726	3,534	-5,192
2044	965,114	9,384	3,800	-5,584
2045	1,034,348	10,057	4,073	-5,984
2046	1,105,174	10,746	4,352	-6,394
2047	1,177,630	11,450	4,637	-6,813
2048	1,251,752	12,171	4,929	-7,242
2049	1,327,578	12,908	5,228	-7,681
2050	1,405,149	13,663	5,533	-8,130
Total - operation and maintenance	15,175,692	147,624	59,757	-87,866
Total – construction, operation and maintenance		318,736	230,869	
Operation and maintenance at design capacity	2,000,000	19,447	7,875	-11,571

