

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

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Prepared for:



TRANSMOUNTAIN

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TABLE OF CONCORDANCE

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

TABLE 1

LEGAL INSTRUMENT CONCORDANCE WITH NEB CONDITION 59: WORKER ACCOMMODATION STRATEGY

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

EXECUTIVE SUMMARY

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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1.0 INTRODUCTION

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

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

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

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

1.1 Project Description

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

1.2 Objectives

The objective of the WAS is to:

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

1.3 Links to other Trans Mountain Plans

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

TABLE 2

TRANS MOUNTAIN PLANS LINKED TO THE WORKER ACCOMMODATION STRATEGY

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

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

1.4 Commitment Management

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

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

2.0 CONSULTATION AND ENGAGEMENT

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

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

3.0 SUMMARY OF PROPOSED ACCOMMODATION

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

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

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

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

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

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

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

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

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

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

3.1 Camp Locations

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

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

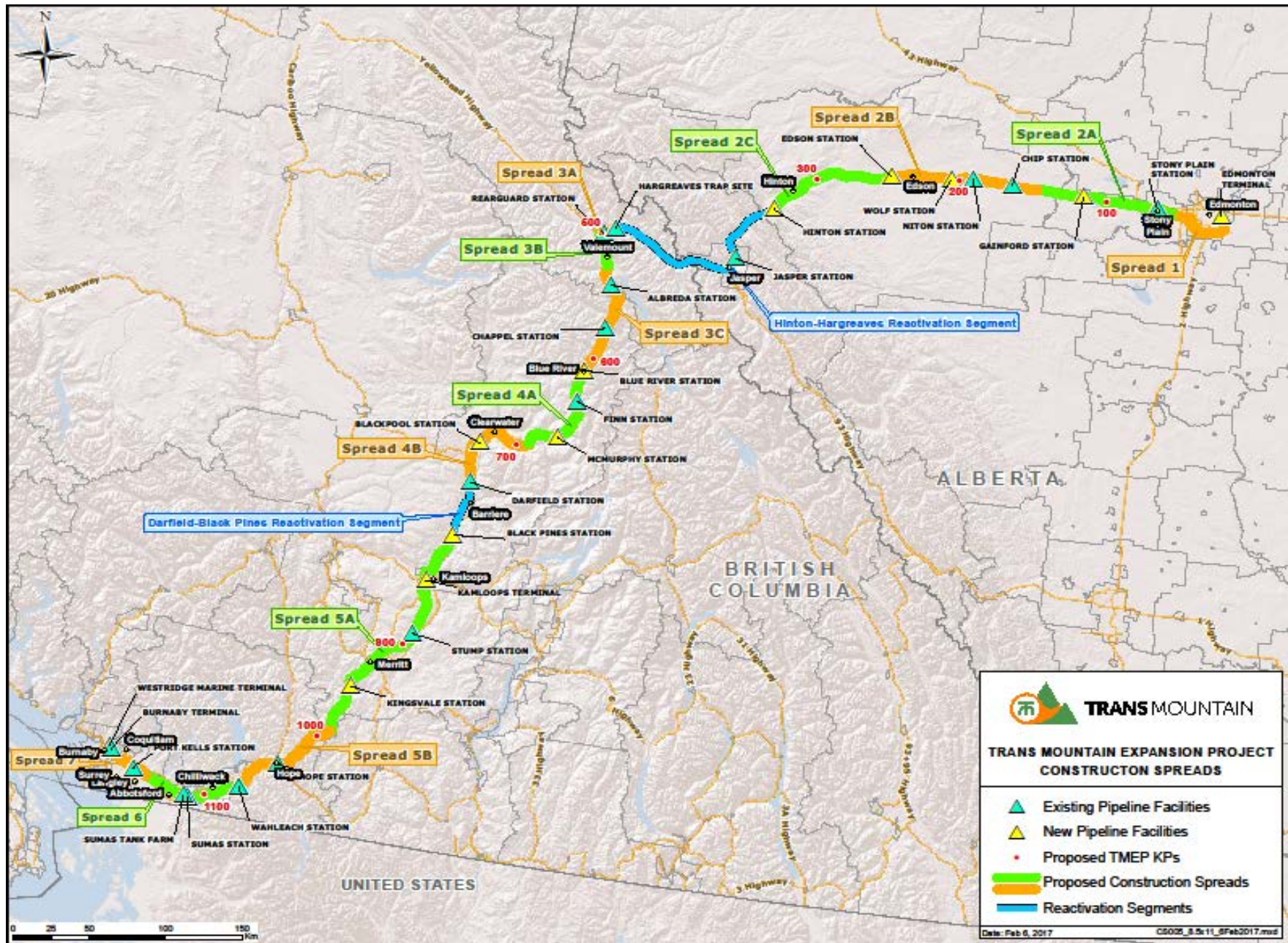
The camp site locations for each of the five camps are summarized in Table 3, and further details are presented in the sections below. Further operational details of camps are discussed in Section 4.2, and camp authorizations pertinent to the commencement of construction are discussed in Section 4.3.

TABLE 3
CAMP LOCATIONS, SIZE AND TYPE

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

PID = Premises Identification

Figure 1 Construction Spreads



3.2 Context

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

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

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

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

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

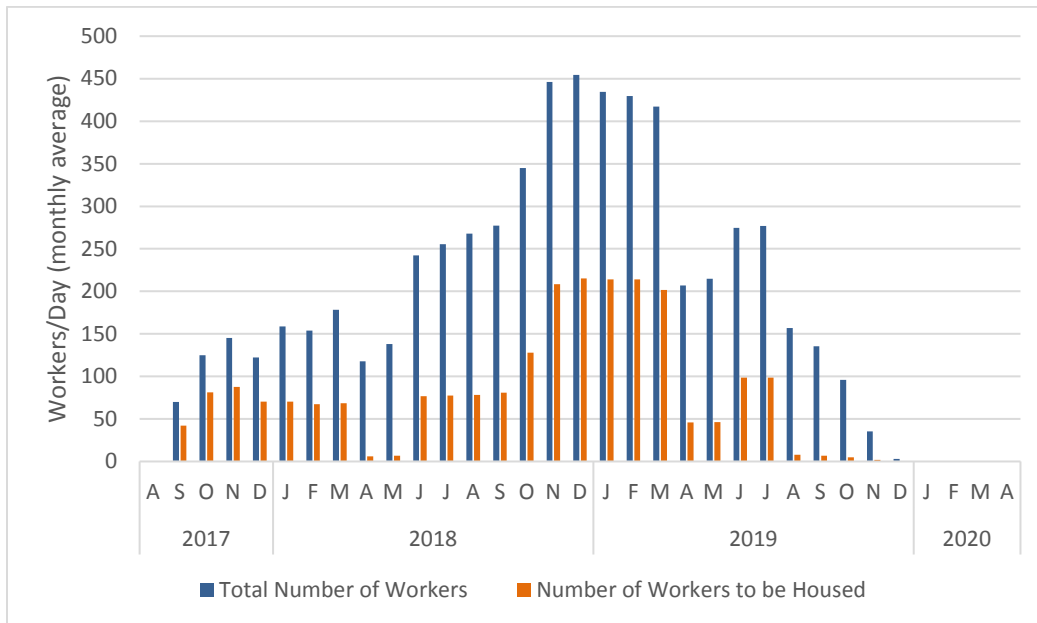
3.3 Spread 1 (Edmonton Region)

3.3.1 *Number of Workers to be Housed*

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

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

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



3.3.2 Proposed Accommodation Approach

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

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

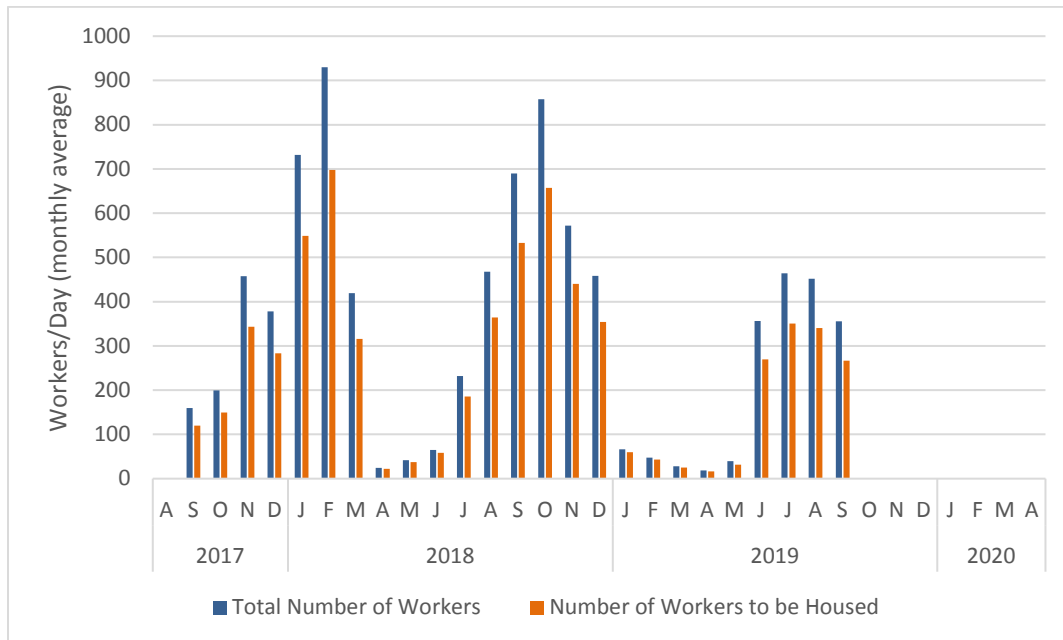
3.4 Spread 2 (Stony Plain, Edson, Hinton)

3.4.1 Number of Workers to be Housed

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

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

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



3.4.2 Proposed Accommodation Approach

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

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

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

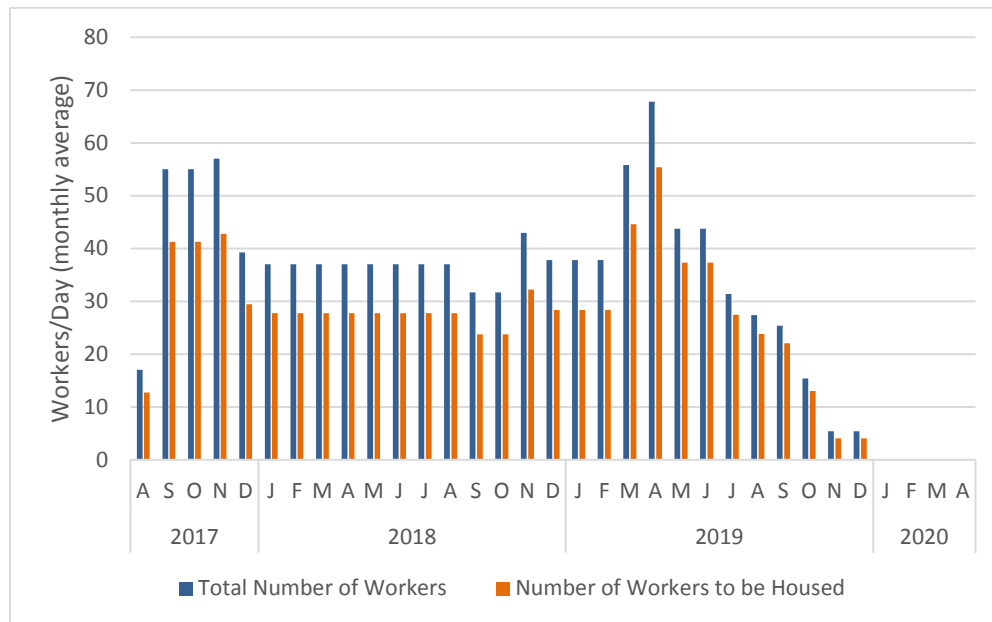
3.5 Hinton to Hargreaves Reactivation Segment (Jasper)

3.5.1 Number of Workers to be Housed

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

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

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



3.5.2 Proposed Accommodation Approach

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

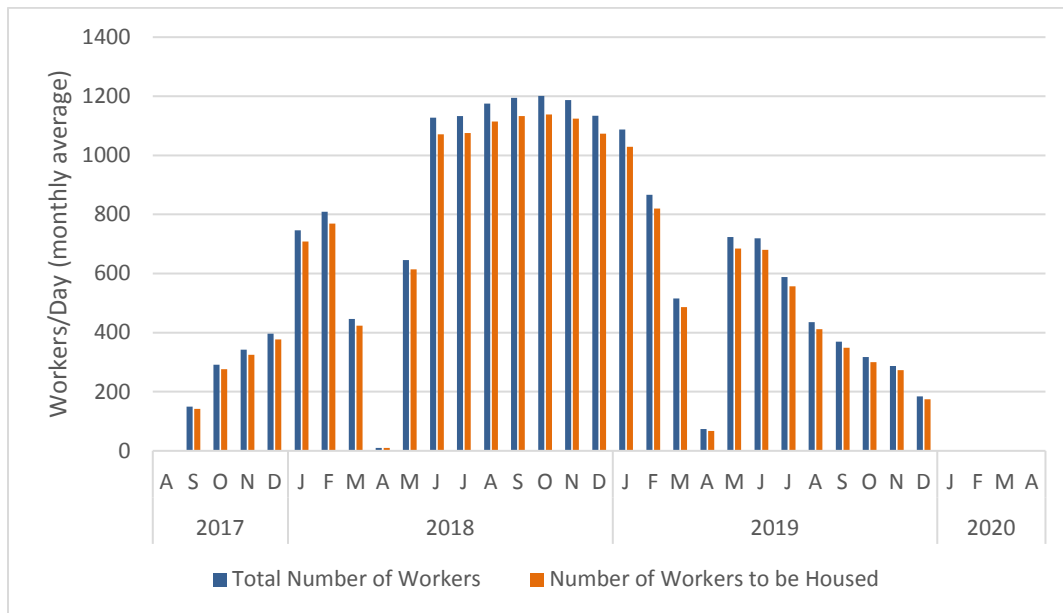
3.6 Spread 3 and 4 (Valemount, Blue River,

3.6.1 Clearwater) Number of Workers to be Housed

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

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

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



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

3.6.2 Proposed Accommodation Approach

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

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

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

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

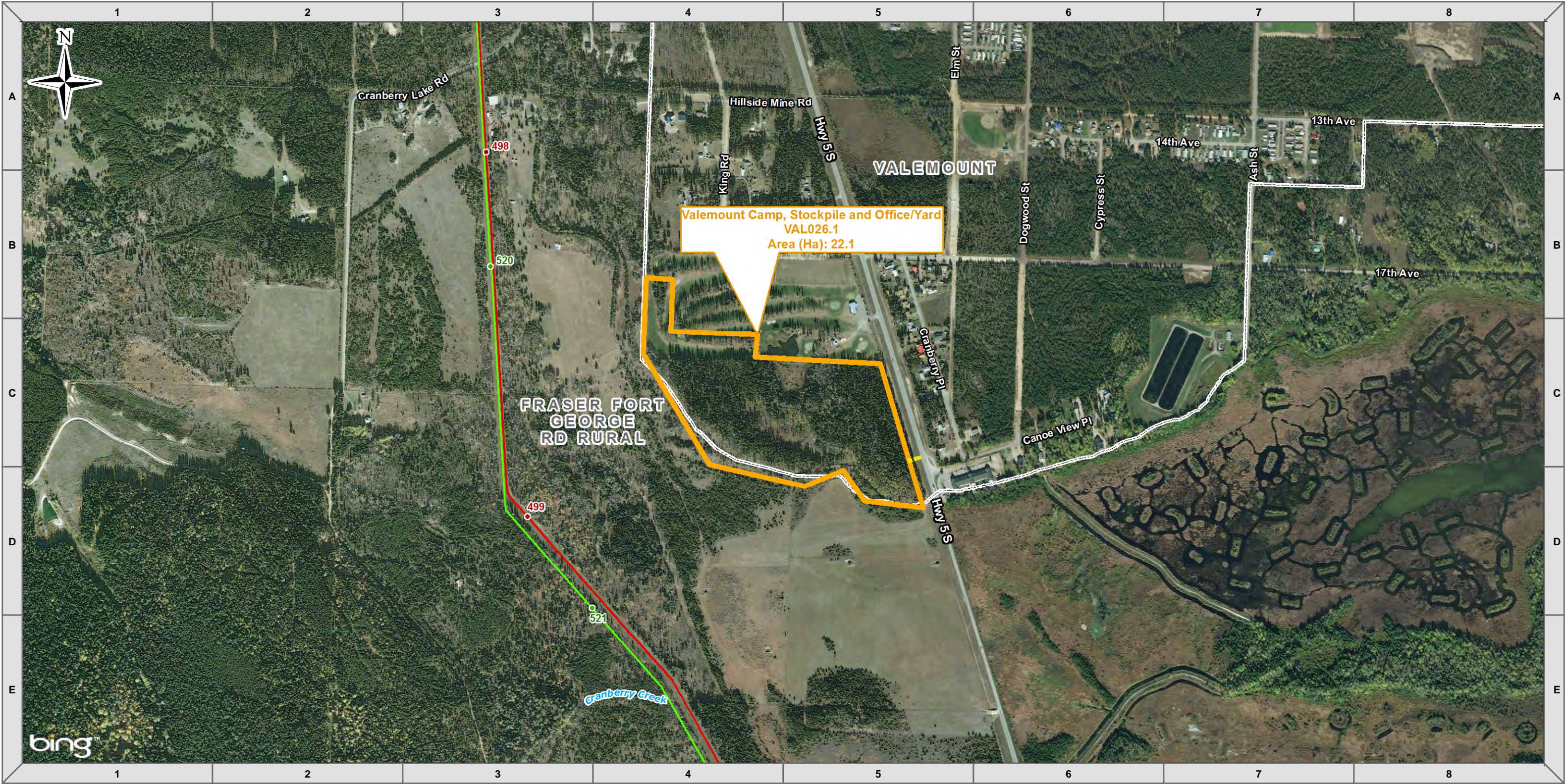
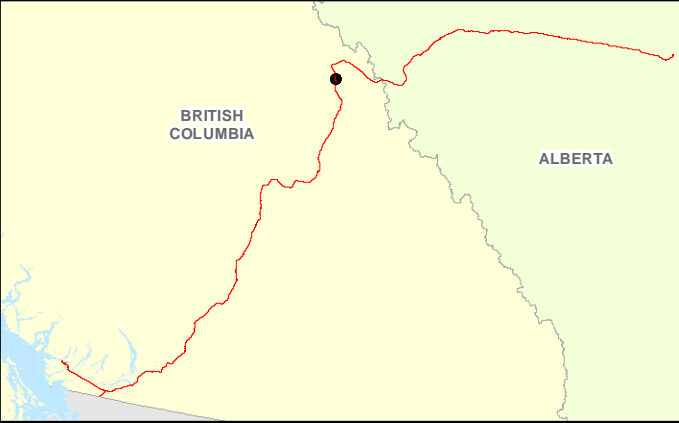
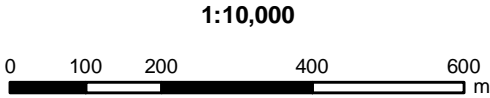


FIGURE 6: CAMP LOCATION - VILLAGE OF VALEMOUNT
TRANS MOUNTAIN EXPANSION PROJECT

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



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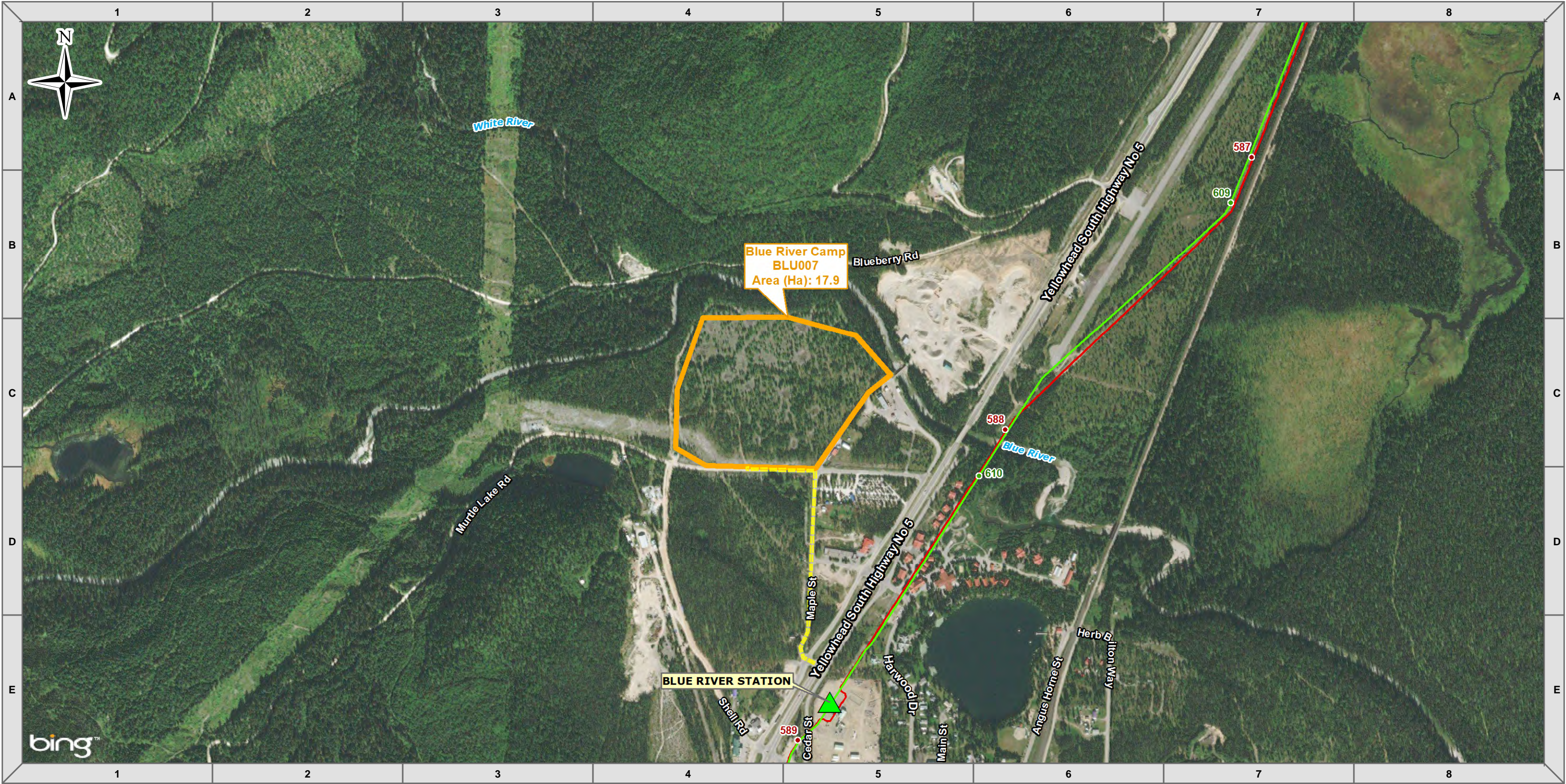
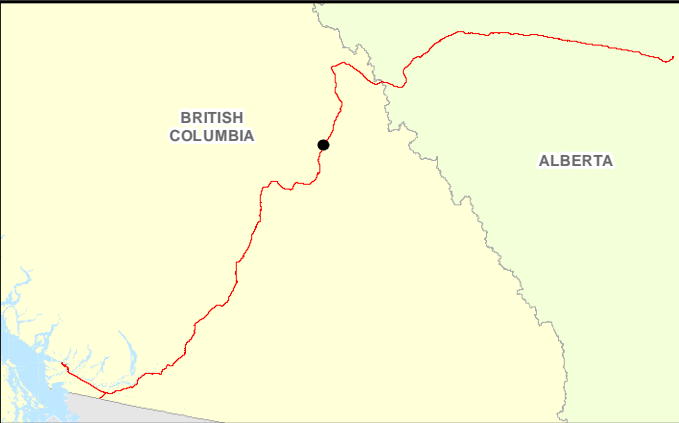
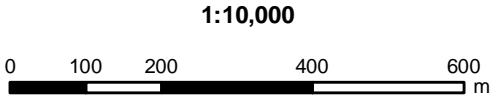


FIGURE 7: CAMP LOCATION - COMMUNITY OF BLUE RIVER
TRANS MOUNTAIN EXPANSION PROJECT

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



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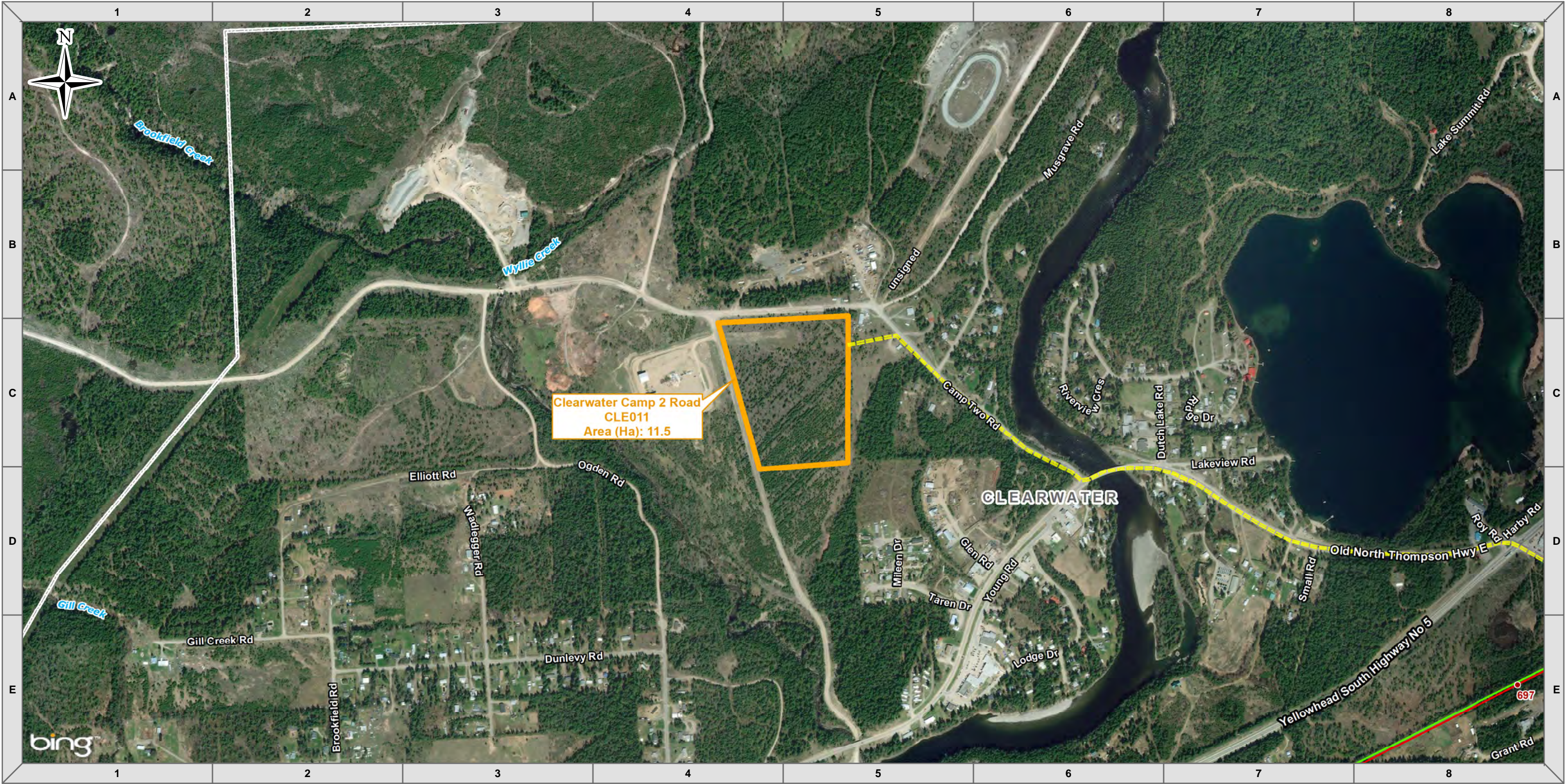









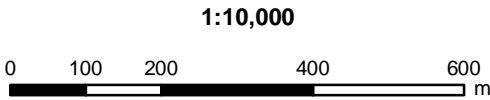


FIGURE 8: CAMP LOCATION - DISTRICT OF CLEARWATER
TRANS MOUNTAIN EXPANSION PROJECT

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



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

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

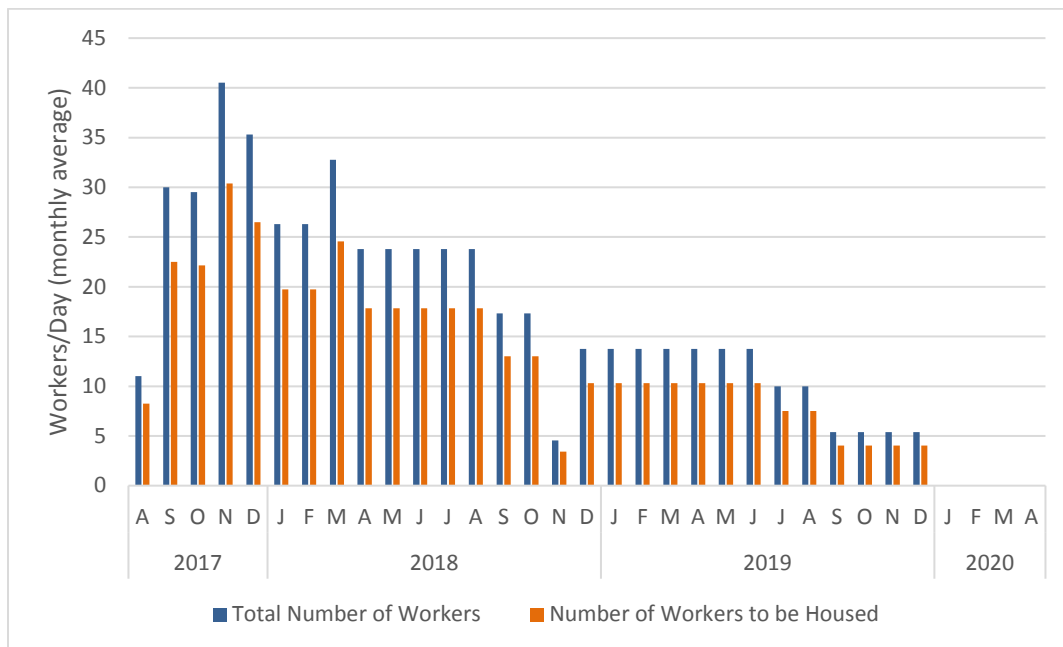
3.7 Darfield to Black Pines Reactivation Segment

3.7.1 Number of Workers to be Housed

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

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

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



3.7.2 Proposed Accommodation Approach

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

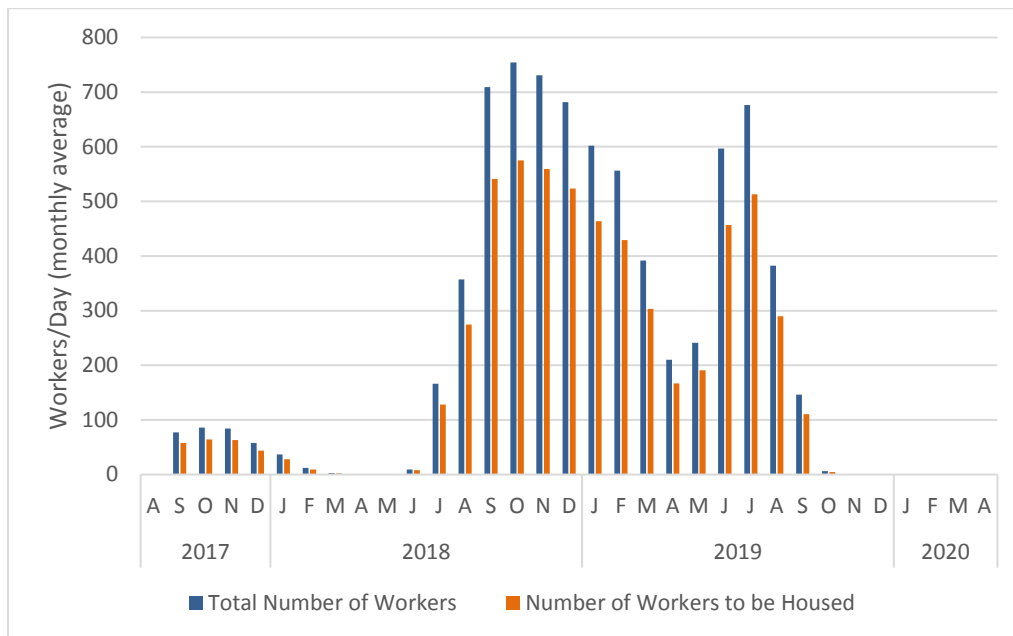
3.8 Spread 5A (Kamloops, Merritt)

3.8.1 Number of Workers to be Housed

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

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

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



3.8.2 Proposed Accommodation Approach

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

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

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

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

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

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

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

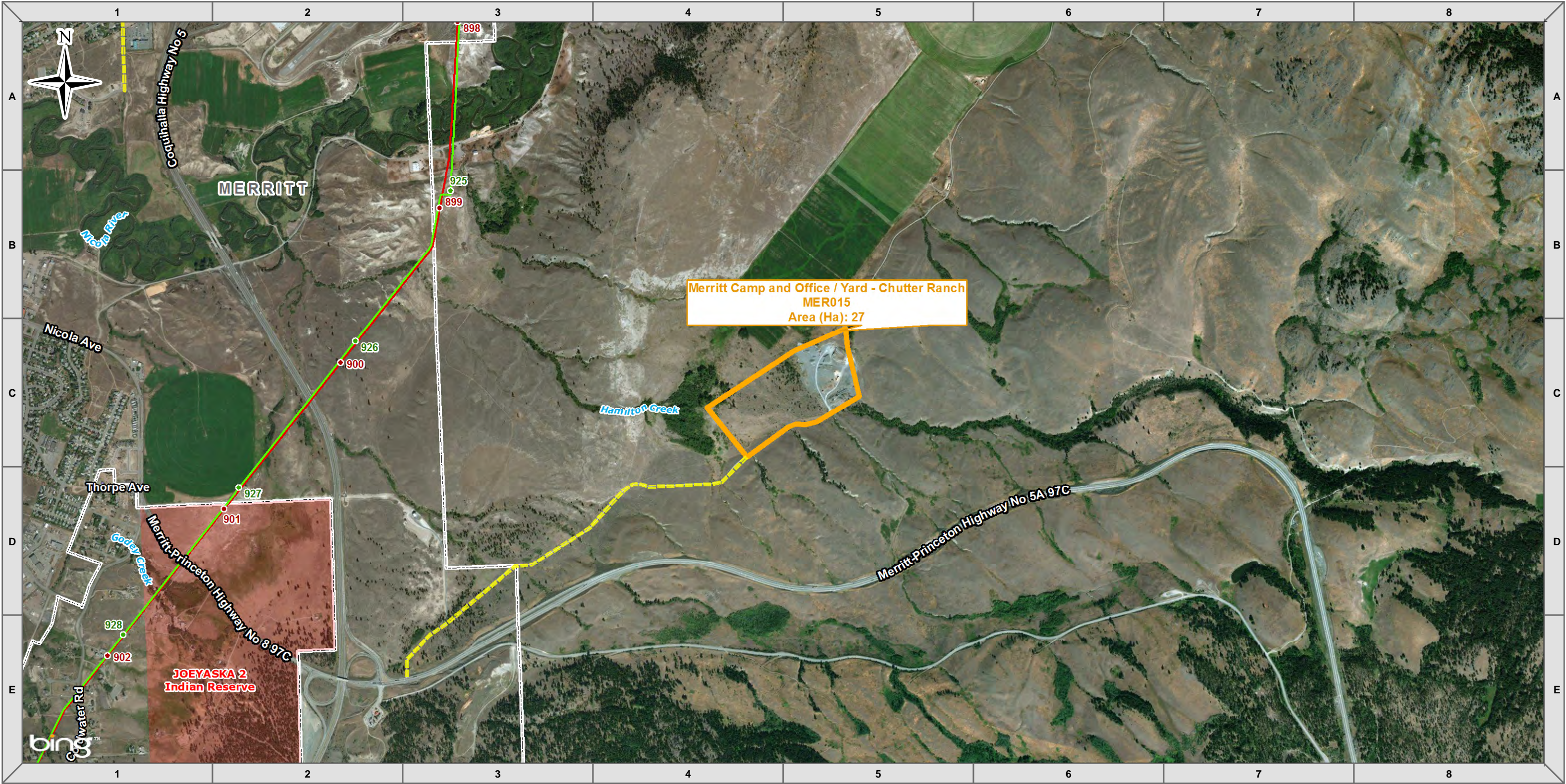
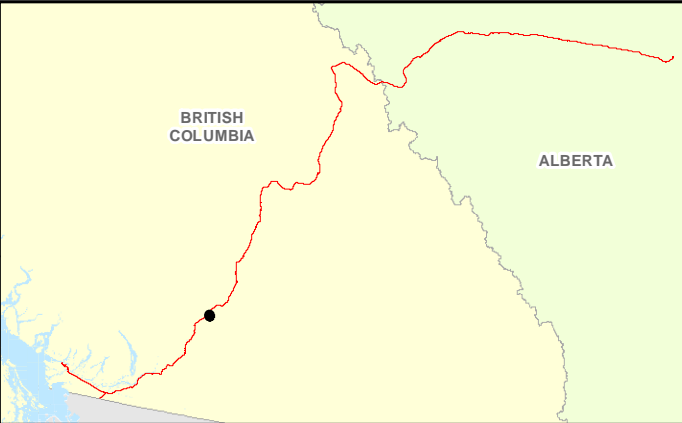
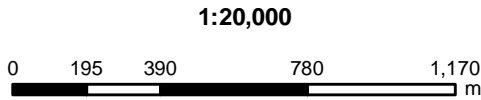


FIGURE 11: CAMP LOCATION - CITY OF MERRITT
TRANS MOUNTAIN EXPANSION PROJECT

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



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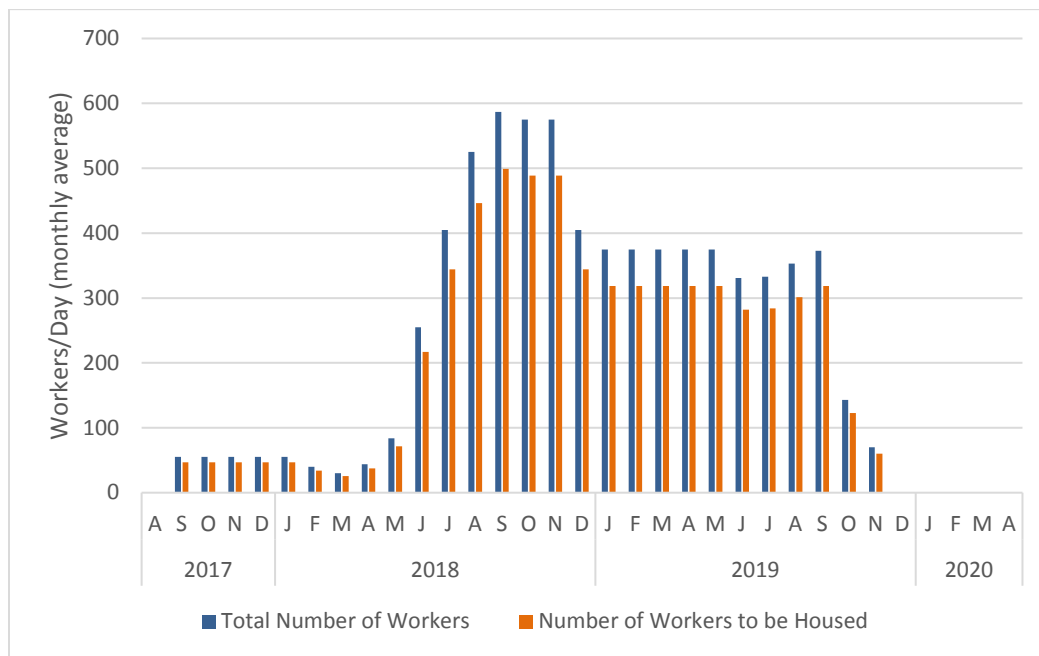
3.9 Spread 5B (Hope)

3.9.1 Number of Workers to be Housed

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

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

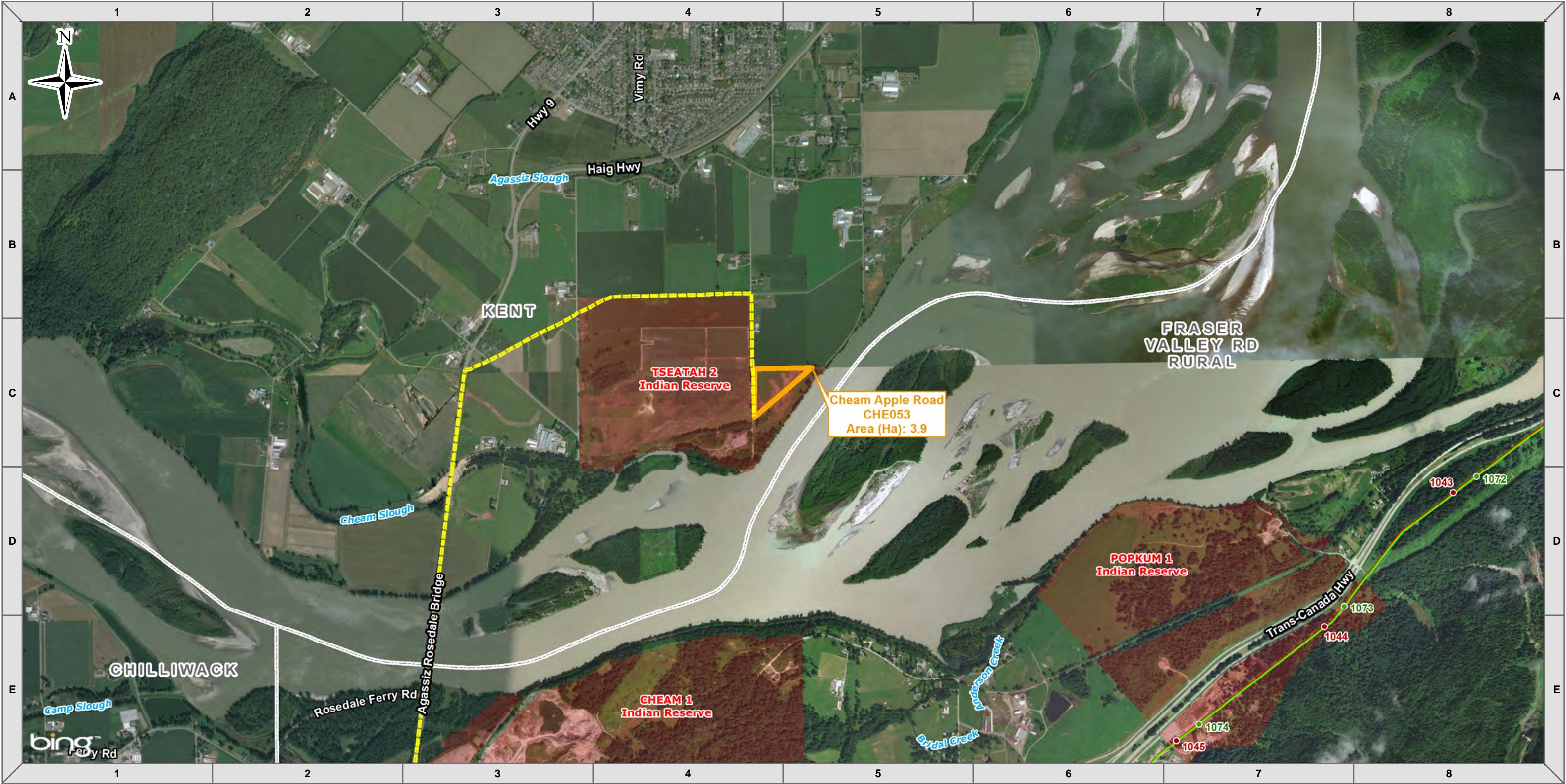
Figure 12 Spread 5B – Estimated Number of Workers to be Housed



3.9.2 Proposed Accommodation Approach

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

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

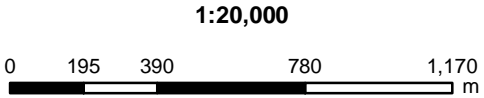


**FIGURE 13: CAMP LOCATION - FRASER VALLEY (CHEAM FIRST NATION)
TRANS MOUNTAIN EXPANSION PROJECT**

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



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

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

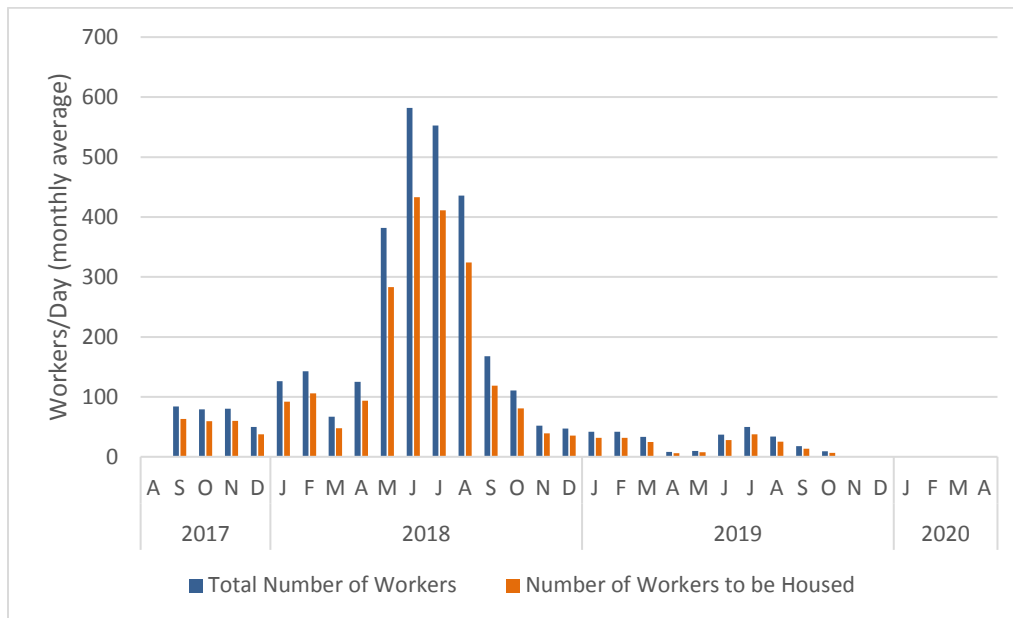
3.10 Spread 6 (Chilliwack, Abbotsford)

3.10.1 Number of Workers to be Housed

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

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

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



3.10.2 Proposed Accommodation Approach

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

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

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

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

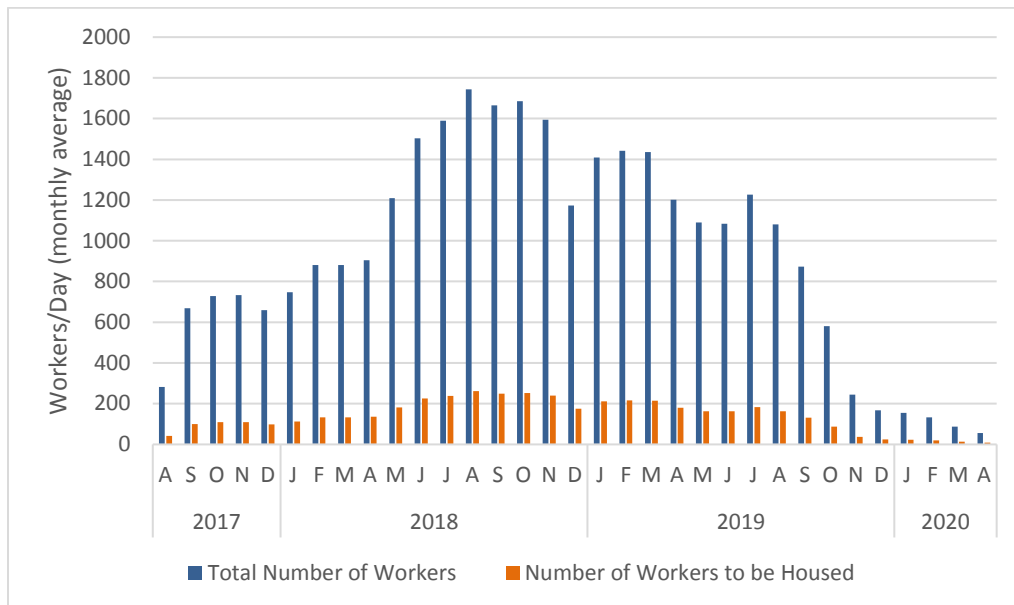
3.11 Spread 7 (Lower Mainland)

3.11.1 Number of Workers to be Housed

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

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

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



3.11.2 Proposed Accommodation Approach

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

4.0 TEMPORARY CAMPS

4.1 Impact Assessment and Mitigation

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

4.1.1 Site-Selection Criteria

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

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

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

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

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

4.1.2 Environmental and Socio-Economic Assessment

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

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

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

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

4.1.3 Mitigation

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

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

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

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

4.2 Operational Requirements

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

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

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

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

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

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

This includes but not limited to the following assumptions:

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

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

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

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

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

4.3 Camp Permits

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

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

TABLE 4
CAMP AUTHORIZATIONS

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

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

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

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

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

4.4 Worker Conduct Policies

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

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

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

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

5.0 SUMMARY

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

Worker accommodation will include the use of:

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

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

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

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

APPENDIX A

CONSULTATION AND ENGAGEMENT

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

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

1.0 Consultation and Engagement Overview: Draft WAS Development

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

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

2.0 Consultation and Engagement Overview: Draft WAS

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

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

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

2016

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

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

2017

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

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

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

3.0 Consultation and Engagement: Activities and Feedback

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

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

3.1 Public Consultation

3.1.1 Public Consultation Summary – May 2012 to June 2015

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

TABLE A-1

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

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

TABLE A-1 Cont'd

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

TABLE A-1 Cont'd

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

TABLE A-1 Cont'd

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

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

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

TABLE A-2

SUMMARY OF PUBLIC CONSULTATION – JULY 2015 TO JUNE 2017

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

3.2 Appropriate Government Authority Consultation

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

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

TABLE A-3

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

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

TABLE A-3 Cont'd

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

TABLE A-3 Cont'd

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

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

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

TABLE A-4

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

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

TABLE A-4 Cont'd

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

TABLE A-4 Cont'd

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

TABLE A-4 Cont'd

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

TABLE A-4 Cont'd

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

TABLE A-4 Cont'd

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

TABLE A-4 Cont'd

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

TABLE A-4 Cont'd

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

TABLE A-4 Cont'd

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

3.2.3 Appropriate Government Authority Consultation Summary – June to August 2017

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

TABLE A-5

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

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

TABLE A-5 Cont'd

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

TABLE A-5 Cont'd

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

3.3 Aboriginal Groups

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

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

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

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

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

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

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

3.3.1 Identifying Aboriginal Groups for Consultation

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

3.3.2 Consultation Activities

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

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

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

3.4 Landowners/Tenants

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

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

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

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

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

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

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

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

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

TABLE A-6

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

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

TABLE A-6 Cont'd

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

TABLE A-6 Cont'd

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

TABLE A-6 Cont'd

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

TABLE A-6 Cont'd

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

APPENDIX B

CAMP AUTHORIZATIONS

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

TABLE B-1
CAMP PERMITS OVERVIEW – VALEMOUNT

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

TABLE B-1 Cont'd

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

TABLE B-2

CAMP PERMITS OVERVIEW – BLUE RIVER

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

TABLE B-2 Cont'd

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

TABLE B-3
CAMP PERMITS OVERVIEW – CLEARWATER

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

TABLE B-3 Cont'd

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

TABLE B-4

CAMP PERMITS OVERVIEW – MERRITT

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

TABLE B-4 Cont'd

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

TABLE B-4 Cont'd

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

TABLE B-5

CAMP PERMITS OVERVIEW – FRASER VALLEY/CHEAM AREA

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

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

APPENDIX C

RECORD OF STAKEHOLDER NOTIFICATIONS OF STRATEGY

TABLE C-1

RECORD OF NOTIFICATION

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

TABLE C-1 Cont'd

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

APPENDIX D

ABORIGINAL GROUPS CONSULTED ON STRATEGY

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

APPENDIX E

TMEP WORKER CODE OF CONDUCT

TRANS MOUNTAIN EXPANSION PROJECT

WORKER CODE OF CONDUCT

May 2017



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1.0 OVERVIEW

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

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

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

2.0 COMPLIANCE WITH LAW

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

3.0 HEALTH, SAFETY AND ENVIRONMENT

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

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

4.0 DRUG AND ALCOHOL USE

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

5.0 RESPECTFUL BEHAVIOUR/HARASSMENT

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

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

6.0 WORKPLACE VIOLENCE AND POSSESSION OF WEAPONS

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

7.0 DRIVING STANDARDS

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

8.0 AFTER-HOURS CONDUCT

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

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

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

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

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

9.0 AWARENESS AND ENFORCEMENT

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

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

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

10.0 SUMMARY OF REFERENCED LAWS, REGULATIONS, POLICIES AND PROGRAMS

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