



## KSI LISIMS LNG

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To: Impact Assessment Agency of Canada; Indigenous groups consulted on the follow-up programs; British Columbia Energy Regulator; Ministry of Environment and Parks; Ministry of Water, Land and Resource Stewardship; and Environment and Climate Change Canada

From: Sandra Webster  
Ksi Lisims LNG

File: Ksi Lisims LNG 2025 CEMP Annual Reporting Status

Date: March 31, 2026

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**Reference: Administrative clarification regarding 2025 annual reporting references for marine sediment quality / benthic invertebrate communities and migratory birds**

### Summary

The Ksi Lisims LNG Natural Gas Liquefaction and Marine Terminal Project (the Project) received an Environmental Assessment Certificate and Decision Statement, including associated conditions, on September 15, 2025. Conditions required the development of a Construction Environmental Management Plan (CEMP) which has since been developed and was approved by the British Columbia (BC) Environmental Assessment Office (EAO) on January 23, 2026. This memorandum addresses annual pre-construction reporting references in Table 18 (Section 13.5) of the CEMP, and related reporting references in Appendix D, Attachment D2, section D2.3.4 of the Migratory Bird Follow-up Program and Appendix F.5.1.2 of the Marine and Freshwater Quality, Sediment Quality and Benthic Invertebrate Monitoring Plan.

No site pre-construction or construction related activities occurred in 2025. Construction did not commence, no vegetation clearing or in-water works were undertaken, and no project-related marine sediment, benthic invertebrate, or migratory bird monitoring results were generated. Accordingly, there are no monitoring results to report for the 2025 reporting period.

This memorandum satisfies the March 31, 2026, administrative reporting expectation referenced in the CEMP and clarifies that the annual pre-construction reporting references



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in Table 18 extend beyond the triggering framework established by the governing Decision Statement conditions.

### 1. Background

Table 18 (Section 13.5) of the Ksi Lisims LNG CEMP identifies annual reporting (on or before March 31 following each reporting year) during the pre-construction phase for:

- (i) effects of changes to marine sediment quality and benthic invertebrate communities; and
- (ii) effects on migratory birds.

Appendix F.5.1.2 requires annual reporting of marine and freshwater monitoring results by March 31 of the following year. Attachment D2.3.4 similarly provides for annual reporting under the migratory bird follow-up program during all Project phases.

As of March 31, 2026, construction has not commenced and no site activity occurred in 2025. This memorandum documents Project status and confirms that no monitoring results were generated, as no triggering activities occurred during the reporting period.

#### Condition 3.17: Marine and Freshwater Quality Monitoring Follow-Up Program

Condition 3.17 requires the Proponent to develop, prior to construction and in consultation with Indigenous nations and relevant authorities, a follow-up program with respect to adverse effects on fish and fish habitat from changes to water quality, and to implement that program during all phases of the Project. A Marine and Freshwater Quality Monitoring Follow-Up Program has been developed and is included as Appendix F to the CEMP.

Marine baseline water quality sampling was conducted in April, June, August, and November 2025 in accordance with the approved sampling plan. Surface, mid-depth, and deep-water samples were collected and analyzed for physical parameters, nutrients, carbon, metals, microbiological parameters, and polycyclic aromatic hydrocarbons. Results were screened against applicable provincial and federal guidelines and are summarized in the Ksi Lisims 2025 Marine Water Quality Baseline Report, which was provided to the BC EAO, BC Energy Regulator, and BC Ministry of Environment and Parks on December 16, 2025 and in the Ksi Lisims LNG 2025 Marine Water Quality Baseline Report Update, March 23, 2026 that was shared on March 27. This work constitutes baseline data collection undertaken in advance of construction and does not constitute follow-up program implementation or follow-up monitoring results.



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### Condition 3.18: Marine Sediment Quality and Benthic Invertebrate Communities Follow-Up Program

Condition 3.18 requires the Proponent to develop, prior to construction and in consultation with Indigenous nations and relevant authorities, a follow-up program with respect to adverse effects on fish and fish habitat from changes to marine sediment quality and benthic invertebrate communities, and to implement that program during all phases of the Project, consistent with applicable provincial guidance. A marine sediment quality and benthic invertebrate communities follow-up program has been developed and is included as Appendix F to the CEMP.

Marine sediment and benthic invertebrate sampling was conducted in September 2025 in accordance with the approved sampling plan. Analysis of these data will support future regulatory submissions, including a Waste Discharge Authorization application to the BC Energy Regulator, anticipated closer to operations. This work constitutes baseline data collection undertaken in advance of construction and does not constitute follow-up program implementation or follow-up monitoring results.

### Condition 4.6: Migratory Bird Follow-Up Program

Condition 4.6 requires the Proponent to develop, prior to construction and in consultation with Indigenous nations and Environment and Climate Change Canada, a follow-up program with respect to adverse effects on migratory birds, and to implement that program during all phases of the Project. A migratory bird follow-up program has been developed and is included as Attachment D2 of Appendix D to the CEMP. Data collection to support this program will commence upon the start of construction and, accordingly, no follow-up monitoring results were generated in 2025.

## 2. Interpretation of the governing requirements

The relevant Impact Assessment Agency of Canada (IAAC) Decision Statement conditions (3.17, 3.18, and 4.6) require follow-up programs to be developed prior to construction and implemented during all Project phases. Condition 2.5.3 further provides that reporting scope, content, and frequency are to be defined through follow-up program development.



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Read together, these provisions indicate that substantive annual reporting is contingent on follow-up program implementation and the existence of monitoring results, not pre-construction status alone.

Accordingly, the inclusion of annual reporting under pre-construction in Table 18 appears broader than the Decision Statement trigger and may reflect an administrative drafting issue. This memorandum does not amend the CEMP; it records the Proponent's interpretation for 2025 and preserves this issue for correction in a future plan update.

### 3. 2025 reporting year status

For the 2025 reporting year, Table 1 summarizes the Project status and corresponding reporting implications.

**Table 1** *2025 Project Status and Associated Reporting Implications*

<b>Topic</b>	<b>2025 Status</b>	<b>Reporting Implication</b>
Construction / site activity	Construction did not commence and no physical site activities occurred.	No follow-up implementation was triggered.
Marine sediment quality and benthic invertebrate communities	No marine works, no desalination discharge, and no monitoring results were generated.	No monitoring results to report.
Migratory birds	No vegetation clearing or triggering activities occurred; no mortality or injury observations were recorded.	No monitoring results or mitigation evaluation to report.

The marbled murrelet survey requirement was fulfilled through Appendix D of the CEMP submission. Separately, other CEMP pre-construction reporting requirements (including compliance status reporting and other milestone-based reporting requirements) are linked to defined triggering activities or milestone timing (e.g., prior to construction or within specified pre-construction timeframes). As those triggers had not been reached in 2025, these reporting requirements were not initiated.



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#### 4. Conclusion

In summary, no Project activities occurred in 2025 that would have triggered follow-up program implementation or generated monitoring results. This memorandum is submitted in lieu of a substantive annual follow-up report and satisfies the March 31, 2026, administrative reporting expectation. Upon commencement of construction or other triggering activities, Ksi Lisims LNG will implement the applicable follow-up programs and provide reporting in accordance with the Decision Statement and approved plans. A future CEMP revision is planned to better align Table 18 with the governing triggers for reporting.

If you have any questions or require additional information, please contact the undersigned.

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