



**Trans Mountain Pipeline ULC (Trans Mountain)
Trans Mountain Expansion Project
File: OF-Fac-Oil-T260-2013-03 61**

**AML-001-2023
Due Date: August 4, 2023**

Trans Mountain Expansion Project response No.1 to AML-001-2023

CER Reference

On or about 01 May 2023 at the undersigned Canada Energy Regulator (**CER**) Inspection Officer conducted a meeting as part of compliance verification activity CV2223-314.

RELEVANT FACTS

I, Andria Logan, designated as a CER Inspection Officer under subsection 102(1) of the *Canadian Energy Regulator Act* (CER Act), believe the following are the relevant facts relating to the issuance of this Order:

- The Socio-Economic Effects Monitoring Plan (**SEEMP**) is part of Volume 6 of the Trans Mountain Expansion Project (**Project**) Environmental Plans.
- The SEEMP states that: “*Project-specific indicators will be the key tool that Trans Mountain uses to identify adverse effects of the Project in a timely manner and to develop adaptive social performance management strategies, where needed*”. The SEEMP also states that data will be proactively collected and provided during construction.
- Project specific indicators (**Indicators**) 2, 3 and 4 apply to the monitoring topic area of worker accommodation from the concern/issue of “worker accommodation strategy (e.g., housing, demand pressure, opportunities for commercial accommodations and other local businesses).”
- Table 5 of the SEEMP outlines the Management Objectives, Threshold for action/mitigation evaluation and Action to be taken, as seen below for Indicators 2, 3, and 4 (extracted from Table 5 of the SEEMP).

Indicator	Management Objective(s)	Threshold for action/mitigation evaluation	Action to be taken
2. Number of worker days (by location) related to construction in field communities categorized by accommodation arrangements: a) Non-local, staying in TMEP camps; b) Non-local, not staying in TMEP camps; c) Local or	Balance minimizing adverse impacts on local accommodation providers and infrastructure/service providers, with also providing positive opportunities for local businesses	Less than 75% of non- local workers are staying in camps (Indicator 2a) And Qualitative feedback received about adverse issue or concern from local authority or tourism/hotel	Contractor to evaluate mechanisms to achieve the balance of accommodation mix desired by local community. Report to Trans Mountain on any adaptive management measures identified.

regional residing at home.		association representative	
3. Living out allowance or related stipend: a) Number of worker days paid. b) total value (\$)	Balance minimizing adverse impacts on local accommodation providers and infrastructure/service providers, with also providing positive opportunities for local businesses	An increase in the value of Indicator 3a from the previous reporting cycle And Qualitative feedback received about adverse issue or concern from local authority or tourism/hotel association representative	Contractor to follow-up with local authority or tourism/hotel association to identify underlying concern and intersection with accommodation approach. Report to Trans Mountain on any adaptive management measures identified.
4. Qualitative feedback about Project use of local/regional commercial accommodations (e.g., hotel, motel, campgrounds).	Balance minimizing adverse impacts on local accommodation providers and infrastructure/service providers, with also providing positive opportunities for local businesses	Qualitative feedback received about adverse issue from local authority, tourism/hotel association or hotel used by contractor.	Contractor to evaluate and identify corrective action. Report to Trans Mountain on any adaptive management measures identified.

- Section 4.2.1 of the SEEMP states that “*while adaptive management will be a continual process (i.e., response will often happen in the short-term as an issue emerges in real-time), each SEEMP assessment and reporting period becomes an opportunity for reflection and course correction.*”
- The SEEMP defines adaptive management as “*a cycle in which the effectiveness of mitigation measures are evaluated based on monitoring results, and adjusted if needed, to achieved desired objectives*”
- During CV2223-314, the Undersigned Inspection Officer learned that Trans Mountain’s management threshold evaluations for the North Thompson Region were not being calculated in accordance with the approved SEEMP in three quarterly Socio-Economic Monitoring Reports – North Thompson Region between January 2022 and March 2023. Specifically, Trans Mountain excluded qualitative feedback from the threshold evaluations for

Indicators 2, 3 and 4 as described below:

- January to March 2022 Report – North Thompson Region:
 - The Regional District of Fraser Fort George expressed concern that an “increase of workforce in the Valemount area has exceeded the supply for such things as permanent and temporary housing and goods and services”
 - For Indicator 3, the report indicated the threshold was not triggered. The first part of the threshold was met.
 - This qualitative feedback relates to Indicator 3 and its inclusion would have triggered the threshold and required action to be taken.
- October to December 2022 Report – North Thompson Region:
 - Valemount Affordable Rental Society and Housing Committee members sent two emails to the CER and cc'd info@transmountain.com in December 2022 expressing concerns regarding housing shortages in the town due to inadequate work camps.
 - This qualitative feedback applies to Indicators 2 and 4.
 - For Indicator 2, the report indicated that the threshold was not triggered. The first part of the threshold was met. Inclusion of this qualitative feedback would have triggered the threshold and required action to be taken.
 - For Indicator 4, the report stated that no qualitative feedback was received.
 - Trans Mountain stated that that emails were not reflected in the Report because the emails were not directed to Trans Mountain and that Trans Mountain received a copy of the communication. Trans Mountain also submitted that the information was not received via an engagement mechanism identified as a data source in Item 12 of Table 3 of the SEEMP. The Inspection Officer does not accept this rationale for the following reasons: the SEEMP does not include qualifiers which would exclude emails on which Trans Mountain is copied; Item 12 of Table 3 lists “other engagement mechanisms” as a data source; and Trans Mountain stated in the SEEMP that data would be collected proactively.
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 - Trans Mountain’s consultation logs indicate that a Village of Valemount Council Member “suggested [to Trans Mountain] the Valemount camp remain open beyond the planned closure to avoid additional use of local rental accommodation”.
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 - For Indicator 2, the report indicated that the threshold was not triggered. The first part of the threshold was met. Inclusion of this qualitative data would have triggered the threshold and required action to be taken.
 - For Indicator 4, the report stated that no qualitative feedback was received.
- The exclusion of this data disrupts Trans Mountain’s adaptive management process that is the basis of the SEEMP.
 - In the absence of an effective adaptive management process, Trans

Mountain is unable to demonstrate compliance to the approved Socio-economic Effects Monitoring Plan.

CER Request

1. Trans Mountain shall take the following actions based on Table 5 of the SEEMP by **4 August 2023**

For Indicator 2:

- i. Provide a description of the balance of accommodation mix desired by the local communities. This will include a detailed summary of engagement with the local community and will demonstrate Trans Mountain determined the balance of accommodation mix desired by the local community.
- ii. Provide an evaluation of mechanisms to achieve the balance of accommodation mix desired by the local community.
- iii. Provide a list of adaptive management measures identified.
- iv. Provide a timeline for implementation of adaptive management measures identified in part iii) or justification for any measures that Trans Mountain does not intend to implement.

For Indicator 3:

- v. Undertake follow-up with local authority or tourism/hotel association and other relevant stakeholders, to identify the underlying concern and intersection with accommodation approach from the period of 1 January 2022 until the completion of reclamation.
- vi. Provide a detailed summary of part v).
- vii. Provide a list of adaptive management measures identified.
- viii. Provide a timeline for implementation of adaptive management measures identified in part vii) or justification for any measure that Trans Mountain does not intend to implement.

For Indicator 4:

- ix. Provide an evaluation regarding Project use of local/regional commercial accommodation and identify corrective action.
- x. Provide a list of any adaptive management measures identified.
- xi. Provide a timeline for implementation of adaptive management measures identified in part x) or justification for any measures that Trans Mountain does not intend to implement.

CER Request

- i. Provide a description of the balance of accommodation mix desired by the local communities. This will include a detailed summary of engagement with the local community and will demonstrate Trans Mountain determined the balance of accommodation mix desired by the local community.

Trans Mountain Response

Shortly following the Order, Trans Mountain developed two workforce accommodation surveys to gather feedback from:

- a. Valemount community residents (community survey); and
- b. Valemount local authority, tourism/hotel association and other relevant stakeholders including accommodation providers (targeted survey).

Both surveys were opened on July 12, 2023 and were closed on July 21, 2023. Targeted emails inviting responses to the targeted survey were sent on July 13, 2023. See Table 1 for a summary of the engagement method.

Table 1 – Summary of Engagement Method

ENGAGEMENT METHOD	AUDIENCE
Community Survey	
Advertising – print and digital versions	<ul style="list-style-type: none"> • General Valemount Community
Geotargeted social media promotion	
Follow-up email inviting additional feedback	<ul style="list-style-type: none"> • Survey respondents who provided email addresses.
Targeted Survey	
Direct email	<ul style="list-style-type: none"> • Local authorities • Hotel/tourism association • Commercial accommodation providers • Key stakeholders
Follow-up email inviting additional feedback	<ul style="list-style-type: none"> • Survey respondents who provided email addresses.

The description of the accommodation mix desired by the local community is based on the community survey which was available to the Valemount community at large. The community survey sought feedback on the desired mix of accommodation between now and the end of October 2023, which is the anticipated departure of the General Construction Contractor (GCC) under current planning for the Project. The survey noted that under current planning, Trans Mountain expects the number of Project workers in Valemount to decrease from approximately 300 in August 2023 to approximately 70 in October 2023. The community survey was promoted through print and digital advertising as well as geotargeted social media. Trans Mountain received 30 responses to the community survey.

Based on the community survey, the accommodation mix desired by the local community from August to October 2023 is a mix of commercial accommodations (i.e., hotels, motels, RV parks or campgrounds), local private rental accommodations, and the Blue River Camp, with the most common preference indicated being use of commercial accommodations.

Of the types of worker accommodation option selections made by community survey respondents (multiple selections allowed), 43% of selections indicated desired use of commercial accommodations, 27% of selections indicated desired use of local private rentals, 23% of selections indicated desired use of Blue River Camp, and 7% of selections indicated the respondent was unsure of desired accommodation (see Table 2).

Table 2 - Types of Accommodation Use Preferred between August – October 2023, Valemount Community Responses

Preferred Accommodation Type(s)	Number of Selections	% of Total Selections
Blue River Camp	10	23%
Commercial Accommodations (i.e., hotels, motels, RV parks, campgrounds)	19	43%
Local private rentals	12	27%
Not sure	3	7%

Valemount community survey, July 2023

- ii. Provide an evaluation of mechanisms to achieve the balance of accommodation mix desired by the local community.

Trans Mountain Response

Based on most recent Trans Mountain data (June 2023) for the North Thompson Region, Trans Mountain currently has an accommodation mix similar to the accommodation mix desired by the local community, with emphasis on use of commercial accommodation and private rental accommodation and use of Blue River camp. June 2023 data for North Thompson region indicates that 77% of on-site workforce is residing in local accommodations (including commercial accommodation and rentals) and 18% is staying in camps (Blue River camp is available), with the remainder of the workers residing at home. This is similar to the accommodation mix desired by the local community shown in Table 2, which indicates that 70% of community survey respondents prefer the use of commercial accommodations and local private rentals and 23% prefer use of Blue River Camp and 7% not sure of preference. As noted in the response to CV2223-314 IR#6, neither Trans Mountain nor its Contractors track (and they do not have the ability to track) the number of non-local workers specifically staying in the following types of local accommodation in the North Thompson Region (or any region): hotels; motels; bed & breakfasts; room rentals within personal homes; house rentals; and RV sites. The Blue River camp will continue to be available through August 2023 to support the workforce focused south of Valemount.

Available mechanisms that Trans Mountain can employ to continue to achieve the balance of accommodation mix described for Valemount in (i) are:

- The GCC can continue to engage with interested commercial accommodation providers and private rental providers and provide guidance to workers about available commercial accommodation.
- Trans Mountain can continue to provide Village of Valemount with monthly Project progress updates through end of October 2023 that include an estimate of construction workforce residing in the Valemount area.

- iii. Provide a list of adaptive management measures identified.

Trans Mountain Response

Trans Mountain will continue to provide the Village of Valemount monthly Project progress updates through end of October 2023 that include an estimate of construction workforce residing in the Valemount area.

- iv. Provide a timeline for implementation of adaptive management measures identified in part iii) or justification for any measures that Trans Mountain does not intend to implement.

Trans Mountain Response

Trans Mountain will continue to provide the Village of Valemount monthly Project progress updates through end of October 2023 that include an estimate of construction workforce residing in the Valemount area. Timeline: immediate; ongoing as of July 2023.

- v. Undertake follow-up with local authority or tourism/hotel association and other relevant stakeholders, to identify the underlying concern and intersection with accommodation approach from the period of 1 January 2022 until the completion of reclamation.

Trans Mountain Response

Through the targeted survey, Trans Mountain has undertaken follow-up with the Valemount local authority, tourism/hotel association and other relevant stakeholders to identify concerns and interests with accommodation approach from the period of January 1, 2022, and will continue to do so until end of reclamation. End of reclamation for the purposes of construction in the North Thompson Region is assumed to coincide with the departure of the GCC in the region (currently anticipated to be by end of October 2023; subject to change).

- vi. Provide a detailed summary of part v).

Trans Mountain Response

The follow up mentioned in part (v) occurred via the targeted survey (described above, see Table 2) that sought feedback from targeted stakeholders about concerns and interests related to worker accommodation in Valemount from January 2022 to October 2023.

Trans Mountain sent an invitation to complete the targeted survey by email to the local authorities (Village of Valemount, Regional District of Fraser Fort George), tourism/hotel association (Tourism Valemount), Ride Valemount, Valemount Chamber of Commerce, Valemount Affordable Rentals Society including the two individuals who wrote to the CER as identified in the Order, and 45 commercial accommodation providers. Trans Mountain sent a follow-up email to survey respondents who provided an email address inviting additional feedback. Trans Mountain received 18 responses to the targeted survey.

Of the 18 targeted survey respondents, 3 respondents identified they were from non-profit organizations and 15 respondents identified they provided local accommodation (i.e., hotel, motel, RV park, campground owner, rental accommodation owner). One respondent indicated they were a member of a Valemount non-profit organization and a rental accommodation owner, which was included in the non-profit organization category.

Seventy-eight percent (78%) of targeted survey respondents indicated either no feedback (39%) or indicated positive feedback (39%) regarding Trans Mountain's use of worker accommodation in Valemount between January 2022 and the time of the survey. Eighty-three percent (83%) of respondents indicated no concerns about Trans Mountain's future use of worker accommodation between August 1 and October 31, 2023. Further, 83% and 94% of respondents respectively indicated there were not aware of any increased use of local rental accommodation (83%) or increased use of local goods and services (94%) following the closure of the Valemount camp community.

Table 3 provides a summary of the targeted survey findings.

Table 3: Summary of Targeted Survey Findings

Question	Response Summary
Do you have any feedback regarding Trans Mountain's use of worker accommodation in Valemount between January 2022 and now?	<ul style="list-style-type: none"> • No: 7 (39%) • Yes, positive: 7 (39%); themes: <ul style="list-style-type: none"> - economic benefit to people and businesses; - helped community economy during COVID; - positive workers relations; good conduct. • Yes, adverse: 4 (22%); themes: <ul style="list-style-type: none"> - staffing challenges for local businesses; - increased housing prices impacting minimum wage workers; - use of local infrastructure.
Do you have any concerns about Trans Mountain's future use of worker accommodation between August 1 and October 31, 2023?	<ul style="list-style-type: none"> • No: 15 (83%) • Yes: 3 (17%); themes <ul style="list-style-type: none"> - lack of accommodation; if workers still in private rentals then impacting local businesses; use camp so more housing for tourism and rentals.
Are you aware of any increased use of local rental accommodation following the closure of the Valemount Camp Community on May 28, 2023?	<ul style="list-style-type: none"> • No: 15 (83%) • Yes: 3 (17%)
Are you aware of any increased use of local goods and services following the closure of the Valemount Camp Community on May 28, 2023?	<ul style="list-style-type: none"> • No: 17 (94%) • Yes: 1 (6%)

vii. Provide a list of adaptive management measures identified.

Trans Mountain Response

Adaptive management measure ideas that were noted by targeted survey respondents are listed in Table 2 below, along with Trans Mountain response.

Action Idea Identified by Respondent	Trans Mountain Response
Valemount camp stay open.	<p>The Valemount camp is closed for TMEP construction due to the declining Project workforce in the Valemount area and the workforce shifting to the southern part of the region. Local accommodation providers continue to express interest in hosting workers. The Blue River camp community is open to support workforce housing further south in the region.</p> <p>The Valemount camp facility is currently occupied by BC Ministry of Emergency Management and Climate Change for wildfire season housing</p>

	support. The leasing arrangement has been made directly with the camp contractor, with Trans Mountain's approval.
A few housing modules gifted to the Valemount affordable rentals society (VARS) to operate as local housing for the community.	Camp assets are owned by each camp operator and are not owned by Trans Mountain. Camp configurations are designed for temporary industry group housing and are not suitable for long-term community housing.

- viii. Provide a timeline for implementation of adaptive management measures identified in part vii) or justification for any measure that Trans Mountain does not intend to implement.

Trans Mountain Response

Trans Mountain identified no further adaptive management as a result of the follow up. See Table 2 for justification of measures that Trans Mountain does not intend to implement.

- ix. Provide an evaluation regarding Project use of local/regional commercial accommodation and identify corrective action.

Trans Mountain Response

SEEMP data indicates that from July 2020 through March 2023, the North Thompson region had on average 800 non-local workers on-site/day per month residing outside of camps and up to about 1,800 (peak) non-local workers on site/day per month residing outside of camps across the North Thompson region. As noted in the response to CV2223-314 IR#6, neither Trans Mountain nor its Contractors track (and they do not have the ability to track) the number of non-local workers specifically staying in each of the following types of local accommodation in the North Thompson Region (or any region): hotels; motels; bed & breakfasts; room rentals within personal homes; house rentals; and RV sites. Trans Mountain understands that the Spread 3/4A Contractor, which has been active in the Valemount area, has indicated that workers are staying in a range of commercial accommodation properties and rental options. During the July 2020 to March 2023 period, as indicated through Indicator 3b, more than \$148 million in living out allowance has been focused in the North Thompson region, which reflects a substantial economic benefit in terms of spending in local businesses and regional economy.

Based on the targeted survey conducted in July 2023 and as shown in Table 3, 78% of respondents indicated either no feedback or indicated positive feedback regarding Trans Mountain's use of worker accommodation in Valemount between January 2022 and now. Eighty-three percent (83%) of respondents indicated no concerns about Trans Mountain's future use of worker accommodation between August 1 and October 31, 2023. Further, 83% and 94% of respondents respectively indicated there were not aware of any increased use of local rental accommodation (83%) or increased use of local goods and services (94%) following the closure of the Valemount camp community.

As of July 2023, Trans Mountain estimates there are about 400 workers using local accommodation in the Valemount area, with the remainder of the workforce spread throughout the North Thompson region focusing on machine clean up and reclamation. Construction is approximately 98% complete in the North Thompson region. Based on current planning, the workforce residing in the Valemount area is anticipated to decline as follows (subject to weather or unforeseen schedule impacts):

- July 2023: 400 workers
- August 2023: 300 workers



- September 2023: 200 workers
- October 2023: 70 workers.

Overall, the Project effect on commercial accommodation in the Valemount area is anticipated to decline steadily for the remainder of construction activity. The closure of the Valemount camp was planned to coincide with workforce demobilization and a notable movement of workforce to the southern portion of Spread 3/4A. With the Blue River camp anticipated to be open until August 2023 and the capacity and interest from local accommodation businesses across the North Thompson region, there is anticipated to be adequate available accommodation to house the remaining workforce as construction winds down while also continuing to support local accommodation businesses.

No corrective action has been identified as the Project is near mechanical completion in the Valemount area, and the Project is planning workforce demobilization from the community.

- x. Provide a list of any adaptive management measures identified.

Trans Mountain Response

No further adaptive management has been identified as the Project is near mechanical completion in the Valemount area, and the Project is planning workforce demobilization from the community.

- xi. Provide a timeline for implementation of adaptive management measures identified in part x) or justification for any measures that Trans Mountain does not intend to implement.

Trans Mountain Response

See response to (x).



**Trans Mountain Pipeline ULC (Trans Mountain)
Trans Mountain Expansion Project
File: OF-Fac-Oil-T260-2013-03 61**

**AML-001-2023
Due Date: August 14, 2023**

Trans Mountain Expansion Project response No.2 to AML-001-2023

CER Reference

On or about 01 May 2023 at the undersigned Canada Energy Regulator (**CER**) Inspection Officer conducted a meeting as part of compliance verification activity CV2223-314.

RELEVANT FACTS

I, Andria Logan, designated as a CER Inspection Officer under subsection 102(1) of the *Canadian Energy Regulator Act* (CER Act), believe the following are the relevant facts relating to the issuance of this Order:

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- The SEEMP states that: *“Project-specific indicators will be the key tool that Trans Mountain uses to identify adverse effects of the Project in a timely manner and to develop adaptive social performance management strategies, where needed”*. The SEEMP also states that data will be proactively collected and provided during construction.
- Project specific indicators (**Indicators**) 2, 3 and 4 apply to the monitoring topic area of worker accommodation from the concern/issue of “worker accommodation strategy (e.g., housing, demand pressure, opportunities for commercial accommodations and other local businesses).”
- Table 5 of the SEEMP outlines the Management Objectives, Threshold for action/mitigation evaluation and Action to be taken, as seen below for Indicators 2, 3, and 4 (extracted from Table 5 of the SEEMP).

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regional residing at home.		association representative	
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Indicators 2, 3 and 4 as described below:

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Mountain is unable to demonstrate compliance to the approved Socio-economic Effects Monitoring Plan.

CER Request

2. Provide a description of any learnings related to the monitoring topic of worker accommodation that will be applied to other regions identified in the SEEMP **by 14 August 2023**.

Trans Mountain Response

Trans Mountain has learned the importance of assessing individual complaints against the balance of interests of the community as a whole, as well as consideration of the value of enhanced engagement when those interests do not align.

There are no learnings that would apply to other regions with the reasoning summarized as follows:

- Each community and region along the Project corridor has unique socio-economic context, interests, and capacity with respect to worker accommodation.
- As the Project nears mechanical completion, the construction workforce is declining in remaining regions with a corresponding decreased use of local accommodation, goods and services.
- Trans Mountain has not received similar workforce accommodation complaints from other regions currently hosting Trans Mountain workers
- The community and targeted survey results confirmed Trans Mountain's workforce accommodation approach in the Village of Valemount and did not point to any changes in approach.

Trans Mountain will continue to monitor for feedback about adverse workforce hosting impacts through its feedback line and other engagement opportunities as the Project construction moves towards completion.

**Trans Mountain Pipeline ULC (Trans Mountain)
Trans Mountain Expansion Project
File: OF-Fac-Oil-T260-2013-03 61**

**AML-001-2023
Due Date: August 21, 2023**

Trans Mountain Expansion Project response No.3 to AML-001-2023

CER Reference

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The Regional District of Fraser Fort George expressed concern that an “increase of workforce in the Valemount area has exceeded the supply for such things as permanent and temporary housing and goods and services”

 - For Indicator 3, the report indicated the threshold was not triggered. The first part of the threshold was met.
 - This qualitative feedback relates to Indicator 3 and its inclusion would

have triggered the threshold and required action to be taken.

- October to December 2022 Report – North Thompson Region:
 - Valemout Affordable Rental Society and Housing Committee members sent two emails to the CER and cc'd info@transmountain.com in December 2022 expressing concerns regarding housing shortages in the town due to inadequate work camps.
 - This qualitative feedback applies to Indicators 2 and 4.
 - For Indicator 2, the report indicated that the threshold was not triggered. The first part of the threshold was met. Inclusion of this qualitative feedback would have triggered the threshold and required action to be taken.
 - For Indicator 4, the report stated that no qualitative feedback was received.
 - Trans Mountain stated that that emails were not reflected in the Report because the emails were not directed to Trans Mountain and that Trans Mountain received a copy of the communication. Trans Mountain also submitted that the information was not received via an engagement mechanism identified as a data source in Item 12 of Table 3 of the SEEMP. The Inspection Officer does not accept this rationale for the following reasons: the SEEMP does not include qualifiers which would exclude emails on which Trans Mountain is copied; Item 12 of Table 3 lists “other engagement mechanisms” as a data source; and Trans Mountain stated in the SEEMP that data would be collected proactively.
- January to March 2023 Report – North Thompson Region:
 - Trans Mountain’s consultation logs indicate that a Village of Valemout Council Member “suggested [to Trans Mountain] the Valemout camp remain open beyond the planned closure to avoid additional use of local rental accommodation”.
 - This qualitative feedback applies to Indicators 2 and 4.
 - For Indicator 2, the report indicated that the threshold was not triggered. The first part of the threshold was met. Inclusion of this qualitative data would have triggered the threshold and required action to be taken.
 - For Indicator 4, the report stated that no qualitative feedback was received.
- The exclusion of this data disrupts Trans Mountain’s adaptive management process that is the basis of the SEEMP.
 - In the absence of an effective adaptive management process, Trans Mountain is unable to demonstrate compliance to the approved Socio-economic Effects Monitoring Plan.

CER Request

3. Provide a corrective action plan detailing how Trans Mountain will ensure that qualitative feedback data will be accurately captured and assessed in future Socio-Economic Monitoring Reports (for all regions and Indicators) by **21 August 2023**.



Trans Mountain Response

Trans Mountain will ensure that qualitative feedback data will be accurately captured and assessed in future Socio-Economic Monitoring Reports by implementing the following actions:

1. Trans Mountain has reviewed feedback line archives to identify any emails that were copied to Trans Mountain but not directed to the Company. There are no other instances where Trans Mountain was copied on an email where Trans Mountain had not previously responded to the stakeholder regarding the same issue. Trans Mountain will document the issues raised by the two emails identified in the Order in the next Socio-Economic Monitoring Report, North Thompson Region.
2. Going forward, Trans Mountain will respond to complaints it is copied on where Trans Mountain has not previously received the complaint directly from the stakeholder.
3. Trans Mountain will document questions directed to the Company, or raised in reference to the Project, during future public presentations to elected officials. Trans Mountain will document responses to these questions. Reports of adverse socio-economic impacts emerging from such documentation would be included in future Socio-Economic Monitoring Reports