SO2 EEM Program Phase III Consultation - Public Comment Tracking Table

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<tr>
<th>Name</th>
<th>Organization</th>
<th>First Nation / Public</th>
<th>Date</th>
<th>Forum</th>
<th>General comments/questions</th>
<th>Topic</th>
<th>Reference: SO2 EEM Plan / Presentation / Topic</th>
<th>Page / Slide #</th>
<th>Rio Tinto Response</th>
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<tr>
<td>Ken Maitland</td>
<td>Kitimat First United Church</td>
<td>Public</td>
<td>29-Jun-22</td>
<td>KPAC Meeting</td>
<td>Asked if there were more details to share about the upcoming vegetation monitoring program including lichen species being monitored, how vegetation is being monitored, and the type of interactions being examined between vegetation and soil.</td>
<td>Terrestrial Ecosystems</td>
<td>June 29 KPAC Summary of Draft 2021 EEM Report Presentation, Terrestrial Ecosystems</td>
<td>N/A</td>
<td>Noted it will take multiple field seasons before patterns emerge. Stated that the proposed 6-year rotating panel will provide two sets of data points for each of the site. Added that vegetation monitored in 2021 exhibited no signs of visible damage due to SO2.</td>
</tr>
<tr>
<td>Ken Maitland</td>
<td>Kitimat First United Church</td>
<td>Public</td>
<td>29-Jun-22</td>
<td>KPAC Meeting</td>
<td>Expressed concern around the proposed 6-year rotating panel. Noted there is risk of damage occurring to vegetation during this timeframe. Expressed interest in an annual program.</td>
<td>Terrestrial Ecosystems</td>
<td>June 29 KPAC Summary of Draft 2021 EEM Report Presentation, Terrestrial Ecosystems</td>
<td>N/A</td>
<td>Explained that the Project Team will be able to observe visible damage from SO2 and fluoride, and that a closer look is not needed if specific visible symptoms are not present. If visible symptoms are found, there is likely to be a direct SO2 effect. Indirect SO2 effects are examined through soil analyses (which takes longer than visual observations). Visual observations will be reported on an annual basis. Vegetation monitoring program was designed to develop a plant biodiversity baseline to better identify trends/changes overtime caused by the effects of acidification (i.e., SO2).</td>
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<tr>
<td>Steve Stannus</td>
<td>KTCAC</td>
<td>Public</td>
<td>29-Jun-22</td>
<td>KPAC Meeting</td>
<td>Inquired about the locations of V23 and V22 passive monitoring sites.</td>
<td>Atmosphere and Human Health; Monitoring</td>
<td>June 29 KPAC Summary of Draft 2021 EEM Report Presentation, Atmosphere and Human Health</td>
<td>Slide 17</td>
<td>Confirmed the sites referenced are located near the water tower, by Terrace and along the highway.</td>
</tr>
<tr>
<td>Ken Maitland</td>
<td>Kitimat First United Church</td>
<td>Public</td>
<td>29-Jun-22</td>
<td>KPAC Meeting</td>
<td>Stated the slides around the Comprehensive Review (CR) Addendum are confusing without background information and suggested it is important to understand the change to modelling due to a correction in wind data. Suggested Rio Tinto should consider adding a slide or two to preface the data error and why reporting changes occurred as a result of this error.</td>
<td>Atmosphere and Human Health; Methodology</td>
<td>June 29 KPAC Summary of Draft 2021 EEM Report Presentation, Atmosphere and Human Health</td>
<td>Slide 5</td>
<td>Thanked Ken for the suggestion and provided background context around the changes to modelling due to a correction in wind data. Confirmed to drafting a slide showing the percent change with and without the corrected data.</td>
</tr>
<tr>
<td>Elizabeth Stannus</td>
<td>KAG</td>
<td>Public</td>
<td>07-Jul-22</td>
<td>Meeting</td>
<td>Asked if network optimization in 2022 referred solely to SO2 emissions.</td>
<td>Atmosphere and Human Health; Network Optimization</td>
<td>July 7 Synopsis of Phase II Plan Presentation, Atmosphere and Human Health</td>
<td>Slides 13-15</td>
<td>Confirmed it is not solely for SO2, but also includes other parameters such as pH.</td>
</tr>
<tr>
<td>Elizabeth Stannus</td>
<td>KAG</td>
<td>Public</td>
<td>07-Jul-22</td>
<td>Meeting</td>
<td>Asked if they will have an opportunity to visit the Lakelse Lake site and if the monitoring information at this site is related to other sites.</td>
<td>Atmosphere and Human Health; Monitoring</td>
<td>July 7 Synopsis of Phase II Plan Presentation, Atmosphere and Human Health</td>
<td>Slides 11-15</td>
<td>Noted monitoring information at the Lakelse Lake site is related to other sites in that that monitoring from a few lakes will inform predictions about similar lakes in the area. Tour of the Lakelse Lake soil monitoring plot and deposition monitoring station was held on July 8th with Trent University.</td>
</tr>
<tr>
<td>Elizabeth Stannus</td>
<td>KAG</td>
<td>Public</td>
<td>07-Jul-22</td>
<td>Meeting</td>
<td>Asked if the network review study is a parallel study for the KAG review in relation to network optimization and when this work will be completed and ready for review.</td>
<td>Atmosphere and Human Health</td>
<td>July 7 Synopsis of Phase II Plan Presentation, Atmosphere and Human Health</td>
<td>Slides 13-15</td>
<td>Confirmed network optimization is reliant on Rio Tinto emissions and the KAG would have an opportunity to review this information. Noted the meteorological data error had delayed reporting and confirmed to share the report after it has been received. The error was due to the misalignment of the wind direction sensors. Added that the data error was corrected, the models were re-run, and the overall results saw very little change in the outcome of the Comprehensive Review.</td>
</tr>
<tr>
<td>Cheryl Brown</td>
<td>Lakelse Lake Watershed Society</td>
<td>Public</td>
<td>07-Jul-22</td>
<td>Meeting</td>
<td>Asked how the age of trees factored into samples sites regarding cyanolichen. Noted there are old growth trees greater than 250 years in age and second growth trees in the study area.</td>
<td>Terrestrial Ecosystems</td>
<td>July 7 Synopsis of Phase II Plan Presentation, Terrestrial Ecosystems</td>
<td>Slide 24</td>
<td>Confirmed terrestrial monitoring sites were first sampled in 2016 were determined based on locations with old growth trees as they are likely to have more cyanolichen. Added that the detailed plan for the terrestrial ecosystems component talks about the selection specific site-selection criteria.</td>
</tr>
<tr>
<td>Ken Maitland</td>
<td>Kitimat First United Church</td>
<td>Public</td>
<td>07-Jul-22</td>
<td>Meeting</td>
<td>Asked how the labour dispute and smelter restart will affect the monitoring data and if this data is reflecting actual emission levels.</td>
<td>Smelter Operations; Atmosphere and Human Health; Monitoring</td>
<td>July 7 Synopsis of Phase II Plan Presentation, Aquatic Ecosystems</td>
<td>Slide 30</td>
<td>Confirmed a reduction in emissions had been observed in the data from the labour dispute. Added that despite the labour dispute, SO2 emissions from the smelter have decreased over time. Field monitoring data is reflective of effects of actual emissions.</td>
</tr>
<tr>
<td>Ken Maitland</td>
<td>Kitimat First United Church</td>
<td>Public</td>
<td>07-Jul-22</td>
<td>Meeting</td>
<td>Expressed concern that acute and chronic monitoring would be showing different data and something needs to be done to rationalize that.</td>
<td>Monitoring; Methodology</td>
<td>July 7 Synopsis of Phase II Plan Presentation, Aquatic Ecosystems</td>
<td>Slide 30</td>
<td>Noted some receptors (e.g., lakes) react immediately to SO2, but others have a lag. Explained a cautious approach has been taken to not overstate SO2 effects from the smelter due to the labour dispute and will continue to monitor SO2 effects, especially given time lags.</td>
</tr>
<tr>
<td>Ken Maitland</td>
<td>Kitimat First United Church</td>
<td>Public</td>
<td>07-Jul-22</td>
<td>Meeting</td>
<td>Suggested Rio Tinto should be prepared to speak further to the difference between acute and chronic monitoring.</td>
<td>Monitoring; Methodology</td>
<td>July 7 Synopsis of Phase II Plan Presentation, Aquatic Ecosystems</td>
<td>Slide 30</td>
<td>Rio Tinto agreed to speak further to the difference between acute and chronic monitoring at a later date.</td>
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</tbody>
</table>
Kag Public 07-Jul-22 Meeting
Asked if there are supply chain issues with calcined coke.
Mitigation - Examples of facility based mitigation
July 7 Synopsis of Phase II Plan Presentation, Climate-Change
July 7 Synopsis of Phase II Plan Presentation, Mitigation - Examples of facility based mitigation
Slide 31

Elisabeth Stannus KAG Public 07-Jul-22 Meeting
Explained the time to adjust the supply of calcined coke has increased. For example, an approximate 16-month period would be required to obtain a contract with an independent calcined coke provider. Rio Tinto will look at the supply chain carefully when analysing options for facility-based mitigations.
Mitigation - Examples of facility based mitigation
July 7 Synopsis of Phase II Plan Presentation, Mitigation - Examples of facility based mitigation
Slide 36

Elisabeth Stannus KAG Public 07-Jul-22 Meeting
Confirmed implementation timelines are forecasts that do not include such review.
Mitigation - Examples of facility based mitigation
July 7 Synopsis of Phase II Plan Presentation, Mitigation - Examples of facility based mitigation
Slide 36

Cheryl Brown Labalee Lake Watershed Society Public 07-Jul-22 Meeting
Recalled a three-year study or report on human health KPIs. Added that there will be many discussions about cumulative effects and how industry, the Ministry of Environment, the Oil and Gas Commission, and First Nation communities work together to develop a framework for SO2 management this year and next. Expressed the importance to have these discussions. Confirmed if there was a current exceedance of a human health KPI, it would be directly from the smelter and therefore Rio Tinto would be responsible for addressing compliance and mitigation requirements. Confirmed Rio Tinto’s desire to work in a timely manner and develop a framework that is responsive to exceedances in SO2 effects.
Human Health Pathway; Monitoring; Methodology
July 7 Synopsis of Phase II Plan Presentation, Mitigation - Examples of facility based mitigation
Slide 36

Ken Maitland Kitimat First United Church Public 07-Jul-22 Meeting
Human health monitoring cycles are 3 years in length and acute emissions today are not being addressed. New human health KPIs are required to address acute emissions. The existing three-year monitoring cycle speaks to chronic effects. People will be looking at information from monitoring stations, seeing a spike and expecting something must be done, but not understanding all of the background factors affecting human health impacts. Noted Rio Tinto is relying on three-year average which looks at chronic SO2 effects and there is a confusion between chronic and acute effects. Suggested the Tinto explain these terms to everyone. Stated the presentation was excellent, but not enough people understood what was presented. Noted a pulpit mill was shutdown in response to emission concerns and people don’t get the same sense of action for the smelter.
Human Health Pathway; Monitoring; Methodology
July 7 Synopsis of Phase II Plan Presentation, Mitigation - Examples of facility based mitigation
Slide 36

Elisabeth Stannus KAG Public 07-Jul-22 Meeting
Recalled a three-year study or report on human health KPIs. Added that there will be many discussions about cumulative effects and how industry, the Ministry of Environment, the Oil and Gas Commission, and First Nation communities work together to develop a framework for SO2 management this year and next. Expressed the importance to have these discussions. Confirmed if there was a current exceedance of a human health KPI, it would be directly from the smelter and therefore Rio Tinto would be responsible for addressing compliance and mitigation requirements. Confirmed Rio Tinto’s desire to work in a timely manner and develop a framework that is responsive to exceedances in SO2 effects.
"Sirius Oil & Gas Commission.
Reporting, Atmosphere and Human Health
July 7 Synopsis of Phase II Plan Presentation, Atmosphere and Human Health
Slide 12

Elisabeth Stannus KAG Public 07-Jul-22 Meeting
Explained Rio Tinto analysed the 99th percentile of hourly SO2 concentrations. Noted the fourth worst day in each, during the three consecutive monitoring years, was found at the residential monitoring locations. Acknowledged that Rio Tinto is required to keep SO2 concentrations below 70 parts per billion (a threshold established by the Ministry of Environment). If this threshold is exceeded, Rio Tinto has three months to submit a mitigation action plan for implementation.
Reporting, Atmosphere and Human Health
July 7 Synopsis of Phase II Plan Presentation, Atmosphere and Human Health
Slide 12

Elisabeth Stannus KAG Public 07-Jul-22 Meeting
Confirmed SO2 concentrations are calculated each year and included in the annual report. Rio Tinto to share the 2021 annual report. Confirmed human health KPIs had been reported on every year since 2017.
Reporting, Atmosphere and Human Health
July 7 Synopsis of Phase II Plan Presentation, Atmosphere and Human Health
Slide 12

Elisabeth Stannus KAG Public 07-Jul-22 Meeting
Noted KPIs are set using the objectives that Environment and Climate Change Canada has established to protect human health. A commitment has been added to Chapter 3 of the SO2 EEM Phase II plan to either retain an air quality health expert to present on air quality objectives setting for health protection or to sponsor an external organization to provide a session on air quality and health.
Reporting, Atmosphere and Human Health
July 7 Synopsis of Phase II Plan Presentation, Atmosphere and Human Health
Slide 36

Ken Maitland Kitimat First United Church Public 07-Jul-22 Meeting
Expressed concern for reporting timelines. Suggested reporting is not timely if an exceedance does occur.
Reporting, Mitigation
July 7 Synopsis of Phase II Plan Presentation, Mitigation - Examples of facility based mitigation
Slide 36

Ken Maitland Kitimat First United Church Public 07-Jul-22 Meeting
It would be helpful to ask Rio Tinto’s commitment to begin responding to SO2 exceedances once identified versus waiting to respond after the final report is prepared.
Reporting, Mitigation
July 7 Synopsis of Phase II Plan Presentation, Mitigation - Examples of facility based mitigation
Slide 36
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<tr>
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<th>Affiliation</th>
<th>Date</th>
<th>Meeting</th>
<th>Comment</th>
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</thead>
<tbody>
<tr>
<td>Elizabeth Starnus</td>
<td>KAG</td>
<td>07-Jul-22</td>
<td>Meeting</td>
<td>Acknowledged lots of work is being done in regard to soil and water monitoring close to the smelter, but not air quality monitoring pertaining to human health close to the smelter or on the westside of Kitimat. Asked how Rio Tinto will incorporate the Industrial Avenue monitoring station, if required by the Ministry of Environment. Monitoring; Atmosphere and Human Health</td>
</tr>
<tr>
<td>Elizabeth Starnus</td>
<td>KAG</td>
<td>07-Jul-22</td>
<td>Meeting</td>
<td>asked if an attainment station data would be included in Rio Tinto’s reporting. Monitoring; Atmosphere and Human Health</td>
</tr>
<tr>
<td>Rob Goffinet</td>
<td>KHAG</td>
<td>07-Jul-22</td>
<td>Meeting</td>
<td>shared that civilians are interested, not just in Rio Tinto, but any emitter in town. Asked Rio Tinto to fill in community members about how LNG Canada will be regulated, studied, and in compliance similar to the smelter or point source. Third Party Industrial Projects; Cumulative Effects</td>
</tr>
<tr>
<td>Rob Goffinet</td>
<td>KHAG</td>
<td>12-Aug-22</td>
<td>Meeting</td>
<td>asked what the reasoning was for discontinuing or relocating Haul Road and what the dialogue was about for going back and forth about the service station site. Monitoring; Atmosphere and Human Health</td>
</tr>
<tr>
<td>Steve Starnus</td>
<td>KTCAC</td>
<td>12-Aug-22</td>
<td>Meeting</td>
<td>asked about the passive monitoring component and what Rio Tinto’s objectives are in looking at sampling locations on the east side of the Kitimat Valley. Monitoring; Atmosphere and Human Health; Monitoring Methodology</td>
</tr>
<tr>
<td>Elizabeth Starnus</td>
<td>KAG</td>
<td>12-Aug-22</td>
<td>Meeting</td>
<td>asked how the results of the network optimization would align with KAG's network review and when to expect the network optimization study to be completed. Monitoring; Atmosphere and Human Health; Network Optimization</td>
</tr>
</tbody>
</table>
KAG Public 12-Aug-22 Meeting

Asked if the KAG network review would inform the environmental monitoring program in the future.

Network Optimization, Atmosphere and Human Health

August 12 Follow-Up Sessions: SO2 EEM Phase III Consultation Presentation, Changes to SO2 EEM Plan

Correct. The SO2 EEMP Plan looks at monitoring the effects of SO2 from the Rio Tinto smelter but also the combined emissions from the LNG projects. When the network review studies are completed, Rio Tinto will have a holistic understanding of the appropriateness of station locations, and if there is a need for relocation, then there will be a process to identify/incorporate those changes into the SO2 EEMP Program.

KAG Public 12-Aug-22 Meeting

Sought clarification around SO2 cumulative emissions. Asked if Rio Tinto is referring to cumulative SO2 emissions or overall emissions including other sources.

Cumulative Effects, Pathway to Mitigation

August 12 Follow-Up Sessions: SO2 EEM Phase III Consultation Presentation, Changes to SO2 EEM Plan

The SO2 program strictly examines SO2. When Rio Tinto references cumulative effects, they are referring to the combined Rio Tinto smelter, LNG Canada, and other LNG project planned for the Kitimat Valley.

KAG Public 12-Aug-22 Meeting

Asked how Rio Tinto would determine sources of SO2.

Cumulative Effects, Pathway to Mitigation

August 12 Follow-Up Sessions: SO2 EEM Phase III Consultation Presentation, Changes to SO2 EEM Plan

In a hypothetical scenario where an exceedance of aquatic KPI was recorded, Rio Tinto would determine how much SO2 emissions contributed to emissions, work backwards from the exceedance to the deposition, look at permitted sources of emissions, and assign a proportion of responsibility to the effect. If Rio Tinto is responsible for 99% of emissions that caused the exceedance, then Rio Tinto would be 99% responsible for proportionally reducing the amount of emissions by 99% that caused the exceedance.

KAG Public 12-Aug-22 Meeting

Expressed interest in learning more about how the determination of SO2 sources from combined emissions would work. Understood that there is discussion of a proportional reaction, but would be interested in other scenarios, not just in the event of KPI exceedance. Asked if information on this was in the report.

Methodology; Monitoring, Atmosphere and Human Health

August 12 Follow-Up Sessions: SO2 EEM Phase III Consultation Presentation, Changes to SO2 EEM Plan

Confirmed this information is in the report.

KAG Public 12-Aug-22 Meeting

Expressed interest in the Haul Road data as it has a wealth of information. Asked why Haul Road had never been mentioned as an informative indicator for human health. Understood it is fine-tuned so it would not be considered a KPI according to regulatory policy.

Methodology; Monitoring, Atmosphere and Human Health

August 12 Follow-Up Sessions: SO2 EEM Phase III Consultation Presentation, Changes to SO2 EEM Plan

The Haul Road data is used for dispersion modelling and understanding fence-line concentrations of SO2. The Haul Road Stations’ SO2 hourly concentration frequencies are presented in Chapter 2 with all the Kitimat air monitoring stations. This allows the comparisons of fence line SO2 levels.

KAG Public 12-Aug-22 Meeting

Recalled information about mitigation agreements in the SO2 EEM Plan (VC), specifically the potential of a service center being installed. Noted this center was originally planned for October 2019 and was installed in April 2020. Suggested that the discrepancy be noted, as this the SO2 EEM Plan implies it was put in October 2019.

Methodology; Monitoring, Atmosphere and Human Health

August 12 Follow-Up Sessions: SO2 EEM Phase III Consultation Presentation, Changes to SO2 EEM Plan

Foot note added to indicate that data reporting started on May 12, 2020.

Kitsimat First United Church Public 12-Aug-22 Meeting

Expressed that, in terms of climate change, annual reporting does not add anything to the discussion. Suggested Rio Tinto be more specific with their reporting, like collecting weather data showing number of days above or below the average for the month. If there are extremes, like heat in the winter or cold in the summer, the average would not change. Suggested setting up a reporting system that captures extremes in temperature, wind, severity of storms, in terms of monthly averages to add sophistication to the climate change analysis.

Climate Change; Reporting, Methodology

August 12 Follow-Up Sessions: SO2 EEM Phase III Consultation Presentation, Changes to SO2 EEM Plan

Table 21 in Section 7 of the SO2 EEM Phase III plan has been adjusted to include:
- Precipitation patterns (cumulative and storm depths)
- Precipitation pH (weekly and annual average)
- Air temperature against historical normals (seasonal, extremes and annual averages)

KTCAC Public 12-Aug-22 Meeting

Asked if the climate change component would include new Ministry of Environment guidelines as made available.

Climate Change; Reporting, Methodology

August 12 Follow-Up Sessions: SO2 EEM Phase III Consultation Presentation, Changes to SO2 EEM Plan

The intent of adding climate change to the SO2 EEMP program is to understand the effects of climate change on SO2 monitoring results. BC EIA’s regulatory/guideline changes are beyond the SO2 EEMP Program. Rio Tinto does have a climate change program, Director of Climate Change, and looks at regulations and opportunities to reduce greenhouse gas emissions.

KAG Public 12-Aug-22 Meeting

Asked if the Human health KPI attainment status annual report could be shared with the KAG or if it was part of the annual environmental report issued each year. Sought clarification around this report’s timeline.

Atmosphere and Human Health; Monitoring

July 7 Synopses of Phase II Plan Presentation [Review, Atmosphere and Human Health

The human health KPI report can be sent to the KAG and Shawn will follow up with her on the report when he returns to Kitimat.

KTCAC Public 12-Aug-22 Meeting

Asked about the elevation of the far east passive air monitoring station near Lakelse Lake and when the stations in the north were initiated. Sought interest in seeing how elevation affects the outcomes of SO2 data at new locations.

Atmosphere and Human Health; Monitoring

July 7 Synopses of Phase II Plan Presentation [Review, Atmosphere and Human Health

The new locations on the map are approximations but ESSA has a spreadsheet with precise location data. The approximation is only for the new sites and all previous stations are precisely mapped with their coordinates. The sites up in the north show very low concentrations of SO2 even prior to the labour dispute and reduction in emissions and were initiated in 2021. Rio Tinto to send location and elevation information for the far east passive air monitoring station near Lakelse Lake to Steve.
The addition of a climate change section is positive. Climate Change
Northern Health
Slide 39 Rio Tinto to arrange a tour of the Coho flats site as a future activity.

Paul Tait
Northern Health Authority
Public
15-Sep-22 Email
Further emissions reductions to address a future KPI exceedance will only be made after all other SO2 emitters have proportionally reduced their SO2 emissions to in response to the first KPI exceedance. – Can you explain on this or provide more rationale? If, proportionally, it’s determined that a subsequent KPI exceedance is due (even in part) to Rio Tinto operations, then Rio Tinto should be responsible for proportionally managing exceedances attributed to their project.

Atmosphere and Human Health
SO2 EEM Phase III Plan, Version 2, Section 9.2.2

Page 57

This section applies to the Terrestrial and Aquatic Ecosystems components. SO2 cumulative effects has been added to the SO2 EEM Phase II as a shared responsibility. Proportional emissions reductions for Terrestrial and aquatic ecosystems should be completed by all contributors before further emissions reductions are required by a single party.

Paul Tait
Northern Health Authority
Public
15-Sep-22 Email
The total SO2 permit reduction for the Permits under this clause will not exceed 15 Mg/d. – Can you explain on this clause?

Human Health Pathway
SO2 EEM Phase III Plan, Version 2, Section 5.3

Page 15

Emissions reductions will not go below the SO2 emission limit in the P2-00001 Multimedia Permit before it was amended to 42 t/d for the modernized smelter in 2013.

Paul Tait
Northern Health Authority
Public
15-Sep-22 Email
The combined total amount of facility-based SO2 emissions for Rio Tinto will not exceed 15 Mg/d and the 2013 unamended P2-00001 Multimedia Permit limit of 27 Mg/d. – Can you explain on this clause?

Pathways to Mitigation
SO2 EEM Phase III Plan, Version 2, Section 9.2.2

Page 57

Emissions reductions will not go below the SO2 emission limit in the P2-00001 Multimedia Permit before it was amended to 42 t/d for the modernized smelter in 2013.

Paul Tait
Northern Health Authority
Public
15-Sep-22 Email
Section 3 Human Health: NH asks if the health KPI is exceeded that the management strategy also include timely and appropriate public education and recommendations for limiting health risk due to SO2 exposure. NH asks to be notified regarding health KPI exceedance and included in consultations regarding appropriate public education.

Atmosphere and Human Health
SO2 EEM Phase III Plan, Version 2, Section 3

N/A

Section 3.3 has been modified with the following: “The mitigation action plan will include public education and recommendations for limiting health risks. Health communications and recommendations will be developed in consultation with the BC Northern Health Authority.”