

JUSTICE
FOR GIRLS



June 19, 2024

The Honourable Josie Osborne
Minister of Energy, Mines, and Low Carbon Innovation
Via email: [REDACTED]

The Honourable George Heyman
Minister of Environment and Climate Change Strategy
Via email: [REDACTED]

RE: Woodfibre LNG non-compliance with its Environmental Assessment Certificate and June 17, 2024 Order

Dear Honourable Josie Osborne and Honourable George Heyman:

We are writing to request Minister Osborne clarify that the BC Environmental Assessment Office (BC EAO) June 17, 2024 [Order](#) pertaining to the current housing of Woodfibre LNG workers in Port Mellon and Squamish does not intend to supersede the District of Squamish's jurisdiction over the permitting process for Woodfibre LNG's proposed floatel. This is, as you know, not a legally permissible outcome of the order. We remind you of the regulator's [email](#) of May 3, 2024 to Justice for Girls that stated: "The use of the Floatel is restricted until the DoS [District of Squamish] permit is granted and plans satisfied." This statement, of course, accords with the BC EAO's [Assessment of an Application for Certificate Amendment](#), Amendment #3, Floating worker accommodations, Woodfibre LNG project, which asserts; "the EAO recognizes that the Holder would need to meet the appropriate regulatory requirements set by DoS."



The Woodfibre site, including the proposed floatel location, is not zoned for workforce residential accommodation. The Environmental Assessment Act does not confer authority onto the Environmental Assessment Office to interfere with or override municipal zoning and bylaws. Woodfibre LNG is required to seek rezoning to anchor in the waters of Átl'ka7tsem / Howe Sound at the project site, which, as already noted, is outlined in the project's [amended Certificate](#). Application to and approval by the District of Squamish for a temporary use permit or zoning bylaw amendment is legally required.

We request that the Order be updated to state clearly that the EAO pertains only to what does lie within the Office's jurisdiction under section 53 of the Environmental Assessment Act. The clarification needs to be publicly communicated given widespread misapprehension of the import of the Order.

As members of the Squamish community and public interest organisations concerned about the impact of liquified fossil fuel gas (LNG) on the climate, the environment, and in relation to human rights, we have a direct interest in this matter. Woodfibre LNG's inaccurate messaging about the implications of this order has direct – and significant – impact on residents of Squamish. We are deeply concerned that Woodfibre LNG will rush, in light of this order, to populate the floatel without appropriate assessment and permitting by the District of Squamish. The result is a foreseeable flouting of law and, critically, inadequate process assessing at the regional level the impact of occupancy on the safety and human rights of women and girls in the community.

We trust that you will take action on this important matter without delay.

Signed,

Sue Brown, JD, MA
Director of Advocacy and Staff Lawyer
Justice for Girls

Tracey Saxby
Executive Director
My Sea to Sky

JUSTICE
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Cc:

Hon. Premier Eby

Premier and President of Executive Council

Via email: [REDACTED]

Hon. Niki Sharma

Attorney General of B.C.

Via email: [REDACTED]

Hon. Grace Lore

Minister of Children and Family Development

Via email: [REDACTED]

Hon. Bowinn Ma

Minister of Emergency Management and Climate Readiness

Via email: [REDACTED]

Ms. Elenore Arend

Associate Deputy Minister and Chief Executive Assessment Officer

BC Environmental Assessment Office (EAO)

Via email: [REDACTED]

District of Squamish

Via email: [REDACTED]