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January 31, 2025

**VIA RESS AND EMAIL**

Nancy Marconi  
Registrar  
Ontario Energy Board  
2300 Yonge Street, Suite 2700  
Toronto, ON M4P 1E4

Dear Nancy Marconi:

**Re: Enbridge Gas Inc. (Enbridge Gas)  
Ontario Energy Board (OEB) File: EB-2024-0249  
Boblo Island Community Expansion Project (Project)  
Interrogatory Responses**

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In accordance with the OEB's Procedural Order No. 1 dated December 4, 2024, enclosed please find the interrogatory responses of Enbridge Gas.

If you have any questions, please contact the undersigned.

Sincerely,

*Evan Tomek*

Evan Tomek  
Senior Advisor, Regulatory Applications – Leave to Construct

cc: Tania Persad (Enbridge Gas Counsel)  
Zora Crnojacki (OEB Case Manager)  
Lawren Murray (OEB Counsel)  
Lisa (Elisabeth) DeMarco (Resilient LLP)  
Daniel Vollmer (Resilient LLP)  
John Wladarski (Northwind Business Development Inc.)  
Chief Nikki van Oirschot (Caldwell First Nation)

ENBRIDGE GAS INC.

Answer to Interrogatory from  
OEB Staff

Interrogatory

Reference:

Exhibit H, Tab 1, Schedule 1, Attachment 2: Delegation Letter, December 8, 2022;  
Attachment 7: Indigenous Consultation Report: Summary Table (as of December 10,  
2024) and Attachment 8: Indigenous Consultation Log (as of December 10, 2024)

Preamble:

Six Indigenous communities have been identified by the Ministry of Energy and  
Electrification (Ministry of Energy) as potentially impacted by the project:

- Aamjiwnaang First Nation
- Bkejwanong (Walpole Island First Nation)
- Caldwell First Nation
- Chippewas of Kettle and Stony Point First Nation
- Chippewas of the Thames First Nation
- Oneida Nation of the Thames

Enbridge Gas provided the following information to each of the Indigenous communities  
identified by the Ministry of Energy as potentially impacted by the project:

- A detailed description of the nature and initial scope of the project. This included  
a list of other provincial or federal approvals that may be required for the project  
to proceed
- Maps of the project location
- Letter containing information on the Virtual Open House Enbridge Gas Inc. OEB  
Staff Interrogatories EB-2024-0249 - 2 –
- Environmental Report (ER), providing information about the potential effects of  
the project on the Environment, including archaeological assessments (AA)
- Updated ER
- Notice of Project Change, providing information about the changed route, if the  
adjusted route reduces potential cumulative effects and interference and safety  
hazards

- OEB's Notice of Hearing, providing information on how to participate in the OEB's hearing regarding the project

Enbridge Gas has undertaken the consultation with the six Indigenous communities and received their comments and concerns.

As required by the OEB's Environmental Guidelines on Hydrocarbon Projects and Facilities in Ontario, Enbridge Gas filed an Indigenous Consultation Report (ICR) and Log of the consultation with its application. Enbridge Gas provided an updated ICR on December 18, 2024, as required by Procedural Order No. 1. The information in the ICR is updated as of December 10, 2024

Question(s):

How will Enbridge Gas address any additional concerns related to the project that the communities raised after December 10, 2024?

Response:

Enbridge Gas is committed to continuing engagement with Indigenous communities throughout the lifecycle of the Project. Engagement and responses to any additional concerns related to the Project that the communities may raise after December 10, 2024 will be coordinated through the Enbridge Gas team member responsible for managing the relationship with the community.

ENBRIDGE GAS INC.

Answer to Interrogatory from  
OEB Staff

Interrogatory

Reference:

Exhibit H, Tab 1, Schedule 1 Attachment 7: Indigenous Consultation Report: Summary Table (as of December 10, 2024)

Preamble:

Five out of six consulted communities have expressed outstanding concerns with the project going ahead while the active land claim by Walpole Island First Nation (WIFN) is before the federal courts. The land claim includes Boblo Island. Oneida Nation has not expressed any concerns related to the project.

Enbridge Gas discussed concerns related to WIFN's land claim. Enbridge Gas discussed this matter with WIFN, Aamjiwnaang First Nation, Chippewas of Kettle and Stony Point First Nation, Caldwell First Nation, and Chippewas of Thames First Nation.

WIFN commented that Boblo Island is part of its land claim and noted that the project is of "significant interest to the WIFN community." WIFN also expressed that accommodation for the project would be required.

Aamjiwnaang First Nation informed Enbridge Gas that they "...were looking into advancing their own land claim on Boblo Island."

Caldwell First Nation stated that aboriginal title to Boblo Island was never surrendered.

Chippewas of Kettle and Stony Point First Nation was concerned that the project was to start prior to resolution of WIFN's land claim to Boblo Island which was before the courts.

Chippewas of Thames First Nation expressed their concern with the project commencing before the resolution of the WIFN's land claim.

Enbridge Gas has committed to continue the engagement with the Indigenous communities throughout the life of the project.

Question(s):

- a) Please discuss Enbridge Gas's position on concerns raised by the Indigenous communities that the project is not to commence prior to resolution of the WIFN land claim which is before federal courts and which includes Boblo Island.
- b) Please comment on WIFN's assertion that accommodation for the project would be required as Boblo Island is part of the land claim and is of significant interest to the WIFN community.
- c) Please summarize the content and timing of any discussions between Enbridge Gas and the Ministry of Energy regarding WIFN's active land claim. Please discuss whether Enbridge Gas received any direction or guidance from the Ministry of Energy regarding the proposed project in light of the active land claim? Provide copies of correspondence between Enbridge Gas and the Ministry of Energy on this matter.
- d) Please describe Enbridge Gas's plans for continuing engagement with the six Indigenous communities. Which channels of communication will be used and what information regarding the project construction, operation or any other aspect of the project will be conveyed?

Response:

- a) Enbridge Gas is of the view there is no need to delay the Project until the resolution of the land claim. Enbridge Gas has been engaging with WIFN in accordance with the direction provided in the Ministry of Energy's delegation letter (Exhibit H, Tab 1, Schedule 1, Attachment 2) and will continue to address any concerns or questions that WIFN may raise with respect to the Project.
- b) Enbridge Gas recognizes that the area is of significant interest to WIFN and has been working to address WIFN's questions and concerns in relation to the Project. Please see the response at Exhibit I.OEB STAFF-4 for further details as to how Enbridge Gas has addressed expressed concerns, including through commitments and planned mitigation measures.
- c) On May 5, 2023, Enbridge Gas emailed the Ministry of Energy (ENERGY) representative to make them aware of the conversations that were occurring with WIFN with respect to the land claim. Enbridge Gas advised ENERGY of the information WIFN had communicated to Enbridge Gas about the Nation's claim, what information Enbridge Gas had shared with WIFN about the Project location and

related impacts, and Enbridge Gas's plans to continue to engage with WIFN about the Project. ENERGY responded that they appreciated the information and indicated that they would look into whether there were any updates. Please see Attachment 1 to this Exhibit for copies of correspondence between Enbridge Gas and ENERGY on this matter.

- d) Enbridge Gas plans to continue engagement with the Indigenous communities by providing project updates and responding to any follow-up questions from the Indigenous communities. The channels of communication may include in-person or virtual meetings, emails, and site tours. Project updates typically include information regarding construction progress. Information provided during operations will vary depending on the circumstances, including the nature of any planned operational activities that may be undertaken. Enbridge Gas will remain available to answer any questions or address any concerns related to such operations.

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**From:** Lauren Whitwham <Lauren.Whitwham@enbridge.com>  
**Sent:** May 5, 2023 12:14 PM  
**To:** McCabe, Shannon (ENERGY) <Shannon.McCabe@ontario.ca>  
**Subject:** WIFN: Boblo Island

**CAUTION -- EXTERNAL E-MAIL - Do not click links or open attachments unless you recognize the sender.**

Hi Shannon,

I just wanted to make the Crown aware of the conversations I have been having with Walpole Island First Nation in respect to the Boblo Island Community Expansion Project.

In May 2000, the Indian Claims Commission ruled that that WIFN could submit a claim to the federal government to clarify title to Boblo Island. I understand that WIFN has included Boblo Island within their land claim that sits in abeyance with the federal courts.

The community members of Walpole Island have significant land and subsurface interests with Boblo Island because of this title claim. HDD of the river would be the subsurface aspect.

I did expressed that the Project should have little to no impact on rights as it is within the road allowance. We have not yet issued our environmental report and are just in the early phases of engaging on the Project.

I will continue to listen and work with Walpole Island on the Project but wanted to provide you with a heads up about the land title concern they have with the Project.

Happy to chat if you have questions for me.

Thanks,

Lauren

**Lauren Whitwham**

Strategist, Community & Indigenous Engagement, Eastern Region

Public Affairs, Communications & Sustainability

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**From:** [McCabe, Shannon \(ENERGY\)](#)  
**To:** [Lauren Whitwham](#)  
**Subject:** [External] RE: WIFN: Boblo Island  
**Date:** Friday, May 5, 2023 1:04:50 PM

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**CAUTION! EXTERNAL SENDER**

**Were you expecting this email? TAKE A CLOSER LOOK. Is the sender legitimate?  
DO NOT click links or open attachments unless you are 100% sure that the email is safe.**

Thank you, Lauren. I appreciate you passing this information along.

I'll touch base with our legal team/LAO to see if they have any updates.

Hope you have a nice weekend!

Shannon

ENBRIDGE GAS INC.

Answer to Interrogatory from  
OEB Staff

Interrogatory

Reference:

Exhibit H, Tab 1, Schedule 1, Attachment 7: Indigenous Consultation Report: Summary Tables (as of December 10, 2024)

Preamble:

Regarding capacity funding, Enbridge Gas noted that it offered funding to each Indigenous community identified as potentially impacted by the project. According to Enbridge Gas, capacity funding will support timely activities such as technical review of project documents and engagement in meaningful consultation.

Question(s):

- a) Please provide information on which Indigenous communities accepted and were provided capacity funding by Enbridge Gas and provide a description of the activities supported by the capacity funding that was provided.
- b) Please advise if any Indigenous communities raised concerns with Enbridge Gas with respect to the capacity funding being offered and if so, how Enbridge Gas responded to such concerns.

Response:

- a) Enbridge Gas has provided capacity funding to Caldwell First Nation, Chippewas of Kettle and Stony Point First Nation, and Chippewas of the Thames First Nation. Aamjiwnaang First Nation and Walpole Island First Nation provided quotes for capacity funding which were agreed to by Enbridge Gas. Enbridge Gas is awaiting the invoices from Aamjiwnaang First Nation and Walpole Island First Nation and will provide the capacity funding upon receipt of the invoices. The capacity funding was provided to support engagement activities related to the Project including the review of Project documentation, third party reviews of the Environmental Report, meetings and general engagement.



- b) No concerns have been raised with Enbridge Gas regarding the capacity funding that has been offered in relation to the Project.

ENBRIDGE GAS INC.

Answer to Interrogatory from  
OEB Staff

Interrogatory

Reference:

Exhibit H, Tab 1, Schedule 1, Attachment 7: Indigenous Consultation Report: Summary Tables (as of December 10, 2024)

Preamble:

In its summary table filed in evidence, Enbridge Gas summarizes questions or concerns that were raised by community members or representatives related to the project.

Question(s):

Please provide a summary of all forms of accommodation that Enbridge Gas has committed and agreed to make or made to any of the six consulted Indigenous communities in response to the concerns raised in the Indigenous consultation process for the project?

Response:

Enbridge Gas addressed the bulk of the Indigenous communities' concerns by providing relevant Project information and explaining how proposed mitigation measures would limit impacts on the matters of interest to the communities. In certain circumstances, Enbridge Gas made additional commitments to the individual Nations. The following list is a summary of how concerns were addressed, with further details included in the attachments to the Indigenous Consultation Report<sup>1</sup>.

Aamjiwnaang First Nation (AFN)

In the response to AFN's questions and comments, Enbridge Gas provided further explanation of its assessment, as well as the planned mitigation measures, in relation to soil resources, vegetation, species at risk (SAR) and watercourse crossings. Enbridge Gas committed to offering AFN the opportunity to participate in stage 2 archaeological fieldwork and noted that a representative from Enbridge Gas Supply Chain Management

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<sup>1</sup> Exhibit H, Tab 1, Schedule 1, Attachment 7 (updated December 18, 2024).

had met with AFN to discuss opportunities on Enbridge Gas projects. The results of the archaeological assessment will be shared with AFN.

When an AFN representative asked if a natural gas leak on the Horizontal Directional Drilling (HDD) section would contaminate the downstream Great Lakes, the Enbridge Gas representative advised that natural gas is a gaseous molecule that will rise to the surface to escape and would not contaminate the downstream waterway.

Details of how Enbridge Gas addressed AFN's concerns are outlined in line-item attachment 1.24 of Exhibit H, Tab 1, Schedule 1, Attachment 7 (updated December 18, 2024).

#### Chippewas of Kettle and Stony Point First Nation (CKSPFN)

In response to CKSPFN's questions and comments, Enbridge Gas provided CKSPFN further information regarding the Project and provided additional explanation of its assessment as well as the planned mitigation measures, in relation to a myriad of subject areas that were the focus of CKSPFN's comments, including: SAR; watercourses and groundwater; wildlife; aquatic species; the subsurface environment; air quality and atmospheric environment; cumulative effects; archaeological resources; and alternative approaches. In the responses, Enbridge Gas emphasized its commitment to ongoing consultation with CKSPFN.

Enbridge Gas agreed to share information regarding: significant shifts in the schedule; the HDD Sediment Control Plan; tree removal plans prior to tree removal as well as information regarding large wildlife encounters and incidents; SAR encounters; the identification of nests during construction activities; the discovery of archaeological resources during construction; reportable spills; and monitoring reports.

Details of how Enbridge Gas addressed CKSPFN's concerns are outlined in line-item attachment 3.25 of Exhibit H, Tab 1, Schedule 1, Attachment 7 (updated December 18, 2024).

#### Caldwell First Nation (CFN)

In response to CFN's questions and comments, Enbridge Gas provided further information regarding the Project and provided additional explanation of its assessment as well as the planned mitigation measures, in relation to a myriad of subject areas that were the focus of CFN's comments, including: SAR; watercourses and groundwater; wildlife; aquatic species; the subsurface environment; air quality and atmospheric environment; cumulative effects; archaeological resources; and alternative approaches.

In the responses, Enbridge Gas emphasized its commitment to ongoing consultation with CFN.

Enbridge Gas agreed to share information regarding: significant shifts in the schedule; the HDD Sediment Control Plan; tree removal plans prior to tree removal as well as information regarding large wildlife encounters and incidents; species at risk encounters; the identification of nests during construction activities; the discovery of archaeological resources during construction; reportable spills; and monitoring reports.

Details of how Enbridge Gas addressed CFN's concerns are outlined in line-item attachment 2.70 of Exhibit H, Tab 1, Schedule 1, Attachment 7 (updated December 18, 2024).

#### Walpole Island First Nation (WIFN)

In response to WIFN's questions and comments, Enbridge Gas provided further information regarding the Project and provided additional explanation of its assessment as well as the planned mitigation measures, in relation to a myriad of subject areas that were the focus of WIFN's comments, including: SAR sightings; nesting period for Bald Eagles; nest sweeps; overwintering turtles and turtle eggs; clean equipment protocol; rare vegetation species; HDD execution; and remediation of the site.

Enbridge Gas agreed to share information with WIFN regarding SAR encounters and spills that are reported to the Ministry of the Environment, Conservation and Parks (MECP) and to consult with WIFN should there be a need to perform work during the Bald Eagle avoidance window. Enbridge Gas also committed to providing WIFN the opportunity to participate in fieldwork as monitors should the MECP identify a need for additional fieldwork. Enbridge Gas offered WIFN the opportunity to participate in the Stage 2 archaeological assessment and committed to providing the final Stage 2 archaeological assessment report. Enbridge Gas also committed to update the Cultural Heritage Screening Checklist to indicate the presence of a Canadian Heritage River in response to WIFN's comment and based on previous consultation with WIFN, and planting trees at a ratio of 3:1 for the Project for any trees cleared during construction. Enbridge Gas also offered to discuss further ways to enhance or create new wildlife habitats or improve riparian areas.

Details of how Enbridge Gas addressed WIFN's concerns are outlined in line-item attachment 6.33 of Exhibit H, Tab 1, Schedule 1, Attachment 7 (updated December 18, 2024).

### Chippewas of the Thames First Nation (COTTFN)

In response to COTTFN's questions and comments, Enbridge Gas provided further information regarding the Project and provided additional explanation of its assessment as well as the planned mitigation measures, in relation to a myriad of subject areas that were the focus of COTTFN's comments, including: vegetation removal; wildlife surveys monitoring; presence of SAR; and the execution of the HDD.

COTTFN participated in the Stage 2 archaeological assessment and Enbridge Gas committed to engaging further with COTTFN should additional archaeological assessments be required in relation to the Project. Further, in the event that targeted wildlife or vegetation surveys were required, Enbridge Gas committed to offering COTTFN an opportunity to participate. Enbridge Gas further committed that it would notify COTTFN within six hours of a HDD frac-out and that the requirement would be included in the Environmental Protection Plan (EPP). Enbridge Gas also indicated it could provide COTTFN the sections of the EPP of concern to COTTFN. Enbridge Gas acknowledges COTTFN's concern outlined in its Letter of Comment dated October 26, 2024<sup>2</sup>, regarding only being able to review sections of the EPP of concern to COTTFN. Enbridge Gas is committed to transparency and will allow COTTFN to review the complete EPP once it is finalized, before construction commences. Enbridge Gas also agreed to work with COTTFN to include the on-site environmental monitors from the Nation for activities on the Project and noted it would arrange site visits for Nations once site restoration has been completed.

Details of how Enbridge Gas addressed COTTFN's concerns are outlined in line-item attachments 4.20 and 4.35 of Exhibit H, Tab 1, Schedule 1, Attachment 7 (updated December 18, 2024).

### Oneida Nation of the Thames (Oneida Nation)

While Oneida Nation did not express substantive concerns about the Project to Enbridge Gas, Enbridge Gas notes the mitigation measures identified in the ER are designed to minimize the extent of impacts of the Project, including impacts on wildlife, watercourses, and vegetation, which are often matters of concern to Indigenous communities.

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<sup>2</sup> [COTTFN Letter of Comment](#)

ENBRIDGE GAS INC.

Answer to Interrogatory from  
OEB Staff

Interrogatory

Reference:

Exhibit H, Tab 1, Schedule 1, Attachment 5: Sufficiency Letter (not filed)

Preamble:

The Ministry of Energy delegated the procedural aspects of consultation to Enbridge Gas and will provide a letter with its opinion on the adequacy of the procedural aspects of Indigenous consultation undertaken by Enbridge Gas related to the project. This letter is referred to interchangeably as the “Sufficiency Letter” or as the “Letter of Opinion”. Enbridge Gas stated that the Sufficiency Letter would be filed on the record once it had been received by Enbridge Gas.

Question(s):

What is the expected date when Enbridge Gas anticipates that the Sufficiency Letter would be provided by the Ministry of Energy?

Response:

The Ministry of Energy (ENERGY) has indicated that the Sufficiency Letter would be provided closer to the close of record for the Project. ENERGY also indicated that it is following the proceeding, will be reviewing interrogatories, and continues to meet with the Indigenous Nations.

ENBRIDGE GAS INC.

Answer to Interrogatory from  
CFN

Interrogatory

Reference:

Exhibit H, Tab 1, Schedule 1, para 6.

Preamble:

EGI describes its Indigenous consultation process as well as its related communications with the Ontario Government. It states that its engagement was based on OEB guidelines as well as Enbridge's Indigenous Peoples Policy ("**IPP**").

Question(s):

- a) Please place Enbridge's *Indigenous Reconciliation Action Plan* ("**IRAP**") on the record in this proceeding.
- b) Please provide specific details describing how EGI has applied the principles, policies and commitments set out in the IRAP and IPP in the context of its engagement and consultations with CFN beyond what is as already set out in the Application. Specifically, please provide specific comment on how the following items from the IPP and IRAP apply in the context of the current Application:
  - IPP:
    - EGI's recognition of the importance of the United Nations Declaration on the Rights of Indigenous Peoples ("**UNDRIP**") in the context of existing Canadian law;
    - Recognizing the legal and constitutional rights possessed by Indigenous Peoples in Canada and the importance of the relationship between Indigenous Peoples and their traditional lands and resources;
    - EGI's stated principle to "engage early and sincerely through processes that aim to achieve the support and agreement of

Indigenous nations and governments for our projects and operations that may occur on their traditional lands”

- EGI’s stated principle that it seeks “the input and knowledge of Indigenous groups to identify and develop appropriate measures to avoid and/or mitigate the impacts of our projects and operations that may occur on their traditional lands.”
- EGI’s statement that it will “provide ongoing leadership and resources to ensure the effective implementation of the above principles, including the development of implementation strategies and specific action plans...”
- EGI’s stated corporate principle of aligning the company’s interests with those of Indigenous communities through meaningful, direct Indigenous economic activity in projects corresponding to community capacity and needs, where possible.

- IRAP:

- Pillar 2 concerning community engagement and relationships
- Pillar 3 concerning economic inclusion and partnerships
- Pillar 5 and in particular its objectives relating to sustainability
- Pillar 6 concerning governance and leadership

- c) Please produce any additional internal or public documents that set out any EGI policies applicable to EGI’s interactions with CFN for the purposes of the matters at issue in this Application.
- d) Did EGI engage with or attempt to engage with CFN historians, local elders and/or knowledge keepers for the purposes of this Application or the matters this Application addresses?
- e) Does EGI recognize CFN’s assertion of continuing title to, jurisdiction over, and rights to occupy and use the water, land, and subsurface areas set out Exhibit A, Tab 2, Schedule 1, Attachment 1. Please provide particulars of EGI’s position.
- f) Please provide details regarding EGI’s commitment to increase Indigenous representation in the workforce and supplier community in relation to the Project and how CFN may benefit from this commitment.



Response:

- a) Please see Attachment 1 to this Exhibit.
- b) Enbridge Inc.'s Indigenous Peoples Policy (IPP)<sup>1</sup> directs the methods by which Enbridge develops mutually beneficial relations with Indigenous communities close to, or potentially affected by, our operations. The assessment performed and consultation undertaken by Enbridge Gas in relation to the Project are consistent with the IPP's recognition of: the legal and constitutional rights possessed by Indigenous peoples in Canada; the importance of the relationship between Indigenous peoples and their traditional lands and resources; and the need for early engagement to ensure timely exchanges of information to allow for project-specific concerns to be addressed.
- As illustrated in Exhibit H, Tab 1, Schedule 1, Attachment 6 and Attachment 7 (updated December 18, 2024), and consistent with the Ministry of Energy's delegation of the procedural aspects of the duty to consult, Enbridge Gas provided potentially impacted Indigenous groups with an overview of the Project as well as detailed information regarding anticipated environmental effects and proposed mitigation measures and has welcomed the feedback of Indigenous groups to inform the assessment and the refinement of mitigation measures in an effort to minimize impacts on Indigenous groups.
  - Enbridge Gas has also attempted to address any questions and concerns and encouraged continued dialogue regarding the Project. Recognizing the potential need for capacity funding in order to engage in these discussions, Enbridge Gas offered the potentially impacted Indigenous groups capacity funding. The overarching principles in the IPP, including the recognition of the importance of reconciliation between Indigenous peoples and broader society, will continue to guide Enbridge Gas's interactions with Indigenous communities and peoples.
  - The IRAP is not a document that is intended to be directly applied to regulatory applications. The IRAP serves as a corporate roadmap for Enbridge Inc.'s continued journey towards truth and reconciliation. It is the mechanism by which Enbridge Inc., as a company, will remain accountable for executing on our commitments and to our partners, including Indigenous peoples. Enbridge

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<sup>1</sup> Exhibit H, Tab 1, Schedule 1, Attachment 5.

- Inc. publicly reports on its progress against the commitments set out in the IRAP in its Sustainability Report<sup>2</sup>. Enbridge Inc. will also be publishing a refreshed IRAP in the near term, which will be available on Enbridge Inc.'s website.
- c) Please see the responses at part a) and b) to this Exhibit. There are no additional documents to provide.
  - d) Enbridge Gas reached out to the CFN community contacts, as illustrated in Exhibit H, Tab 1, Schedule 1, Attachment 6 and Attachment 7 (updated December 18, 2024), to share information about the Project and to receive any feedback and information the community was willing to share, which Enbridge Gas recognized may include information from Indigenous historians, local elders and/or knowledge keepers. The Company would be pleased to discuss any additional concerns CFN may have regarding the Project, including any potential impact on Indigenous interests and use of land and resources, and any recommendations regarding potential mitigation. This consultation assists Enbridge Gas with understanding CFN perspectives, which Enbridge Gas understands may be informed by local Elders and/or knowledge keepers.
  - e) In the ER comments received April 10, 2024, CFN advised that CFN was in the process of reviewing and ratifying a water assertion and a subsurface rights assertion. Enbridge Gas has not received a copy of a formal assertion and does not have a position with respect to that assertion. Enbridge Gas is committed to continuing to engage with CFN about the Project and has planned mitigation measures to protect water and subsurface resources, including the execution of the watercourse crossing via horizontal directional drill.
  - f) Enbridge Gas is open to engaging CFN on procurement opportunities within the region. If CFN has a business list that they could provide to our Supply Chain Management team, this would be helpful in identifying potential opportunities.

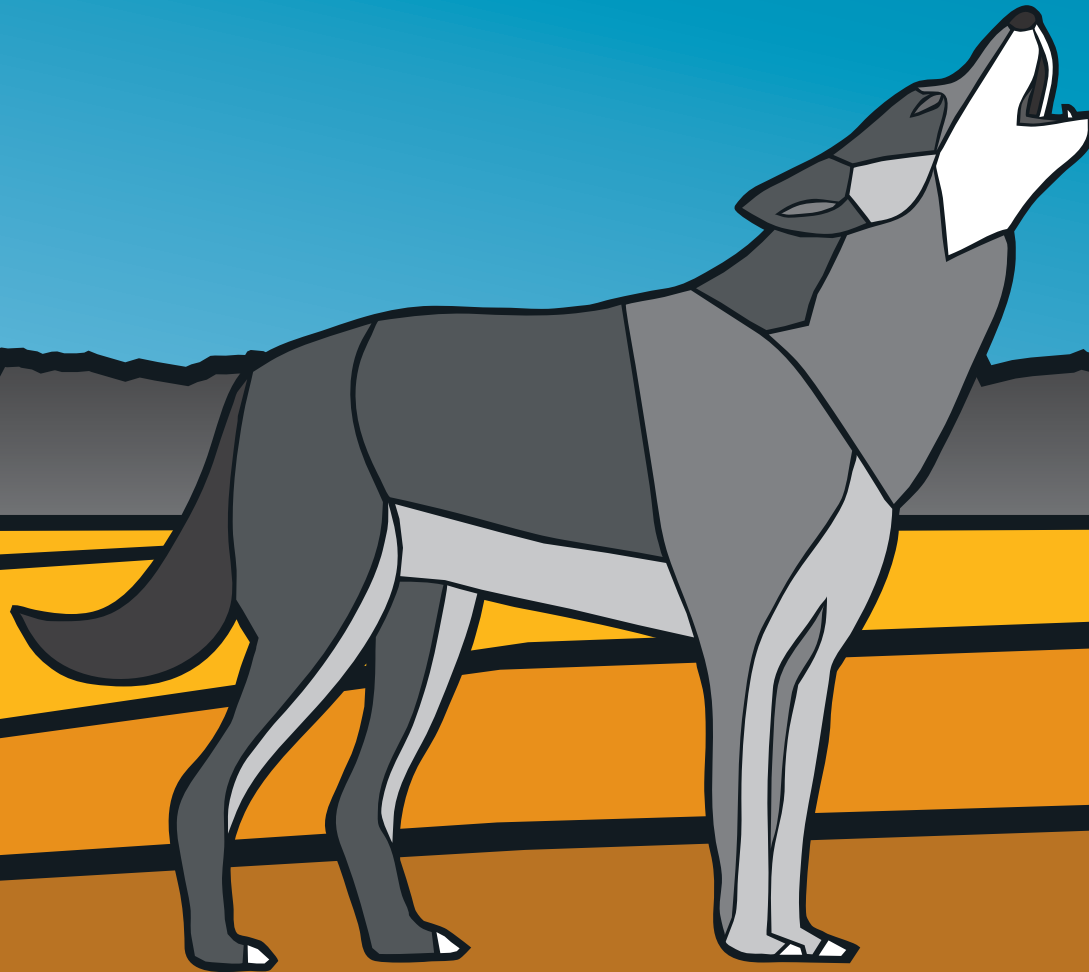
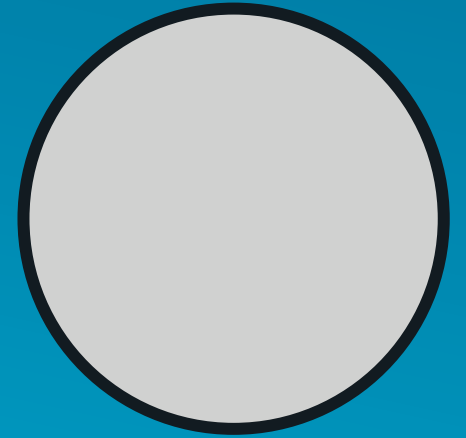
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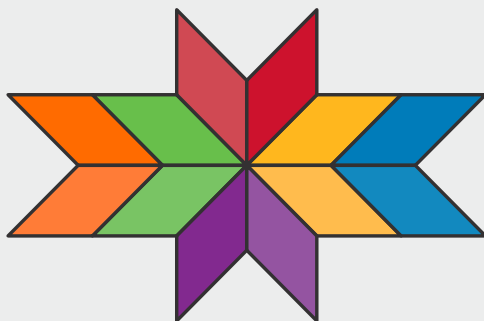
<sup>2</sup> <https://www.enbridge.com/reports/2023-sustainability-report>



# The journey ahead

2022 Indigenous Reconciliation Action Plan





Over the years, Enbridge has been honored with blankets gifted from Indigenous groups. The blankets served as a source of inspiration for the design of the [2022 Indigenous Update Report](#) and this star graphic. We honor these gifts and their importance to the fabric of our culture, and our dedication to continued learning and inclusion of Indigenous culture, heritage and teachings in our everyday lives.

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## Why an Indigenous Reconciliation Action Plan?

Enbridge is proud to share this Indigenous Reconciliation Action Plan (IRAP). As a North American company, it is important to foster meaningful reconciliation within communities where we live and work. This IRAP continues our long-held commitment to advancing reconciliation with Indigenous peoples. Further, it is developed in recognition of the Truth and Reconciliation Commission's Call to Action #92, the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), and with respect for and acknowledgement of Indigenous rights and title, treaties, and sovereignty across Turtle Island<sup>1</sup>. Our IRAP will serve as the roadmap by which we will continue our journey to advance truth and reconciliation. It is the mechanism by which we will remain accountable for executing on our commitments and to our partners, including Indigenous peoples.

\* All dollar amounts are in CAD except when specified in USD.

<sup>1</sup> The continent of North America is often referred to as Turtle Island by some Indigenous peoples. Both terms appear within this IRAP, where appropriate.



### Land acknowledgment

Our projects and operations span Treaty and Tribal lands, the National Métis Homeland, unceded lands and the traditional territories of Indigenous Nations, Tribes, Governments and Groups (Indigenous groups)<sup>2</sup> across North America.

<sup>2</sup> In this IRAP we are using the term "Indigenous groups" when referring to Indigenous nations, governments or groups in Canada and/or Native American Tribes and Tribal associations in the United States. We have the utmost respect for the unique rights and individual names of Indigenous groups across Turtle Island. This collective term is used solely for the purpose of the readability of the IRAP.

## About the artist



Jason Carter is an Indigenous sculptor, painter, illustrator and public artist from the Little Red River Cree Nation at John D'Or Prairie, Alberta, and a Distinguished Alumni of MacEwan University. Jason has major permanent installations in both the Calgary and Edmonton International Airports, and his sculpture and canvas artwork are displayed in many public places (NAC, AFA, YWCA Calgary and Edmonton, Travel Alberta, Wood Buffalo Region, Stantec, Banff Caribou Properties, Microsoft and Canada Goose) and private collections globally.

In 2019, Jason was commissioned by the Museum of Aboriginal Peoples' Art and Artifacts of Canada to create three paintings (two 79" x 29" and one 58" x 29") to be permanently installed in the museum's

entrance. Jason is the lead sculpture artist for 'In Search of Christmas Spirit'; an immersive sculpture exhibit in Banff, Alberta where he created 12' to 18' tall sculptures of bears, wolves, and bison lit from within like a lantern. He worked alongside Banff & Lake Louise Tourism and Parks Canada to complete this initiative. In 2021, Jason created wâpos; another large-scale sculpture installation celebrating the rabbit in Churchill Square, and Winter Solstice, which brought to light the importance of solstice and the passing of the sun and moon in Winter to Indigenous peoples. Most recently, Jason was commissioned by Hockey Canada to hand paint 150 hockey sticks gifted to the player of the game at the World Junior Championships in August 2022.

## About Enbridge

Enbridge is a leading North American energy infrastructure company, headquartered on Treaty 7 territory and a portion of the Métis Homeland in Calgary, Canada. We operate locally, living and working in the communities near our projects and operations. Enbridge has additional major offices across Turtle Island in Houston, Edmonton, Toronto, Duluth and Chatham.

We safely and reliably connect millions of people to the energy they rely on every day, fueling quality of life through our North American natural gas, oil, or renewable power networks and our growing European offshore wind portfolio. We continue to invest in modern energy delivery infrastructure and are committed to reducing the carbon footprint of the energy we deliver. Our goal is to achieve net-zero greenhouse gas emissions by 2050.

To learn more, visit us at [Enbridge.com](https://www.enbridge.com).

“ We believe that our business can play a critical role in advancing reconciliation, and that means acknowledging the truth and learning from the complicated and challenging history of Indigenous peoples. We need to understand the past in order to move forward.

We are a values-driven organization, and therefore we recognize the deep and meaningful connections that Indigenous nations have to water, land and the environment. We've learned not to walk into Indigenous communities with all the answers, but rather to listen carefully to concerns and ask questions that further our understanding. We instill trust by listening carefully and working together – and delivering on the promises we make.



To that end, our first Indigenous Reconciliation Action Plan (IRAP), and its commitments, serve as a beacon of our company-wide focus to advance reconciliation.

That said, reconciliation at Enbridge is more than what could be embodied in this plan. It requires a thoughtful approach, hard work, and respecting and acknowledging our history. Most of all it requires our full commitment to building a better future together. In my experience, this hard work is not only necessary but is always worth the effort. ”

– Al Monaco, President and CEO

## Where we are now in our journey

As a company, we strive for a future where society is united in and committed to creating an inclusive future. We have a role to play in challenging long-held beliefs about the history of Indigenous peoples and embarking on and supporting a path towards reconciliation. As we learn more, and reflect on and acknowledge our journey to date, we create a path that we can walk, together, towards reconciliation. Enbridge is responsible for forging this path – by continuing to listen to and learn about the history, culture and perspectives of Indigenous peoples and identify ways to enable, encourage and support this journey.

While we have been building relationships with Indigenous groups for many years, Enbridge made a commitment in 2017 to enhance transparency by expanding reporting on the implementation of our Indigenous Peoples Policy and the steps we are taking to integrate Indigenous rights and knowledge into our business across Turtle Island. In June 2018, we began to fulfill that commitment with the release of a discussion paper, *[Indigenous Rights and Relationships in North American Energy Infrastructure](#)*, and have since provided an annual overview of our plans, commitments and outcomes with respect to Indigenous inclusion within our 2018–2021 [sustainability reports](#).





We most recently reported on our corporate journey towards reconciliation in February 2022 with the release of, [\*Continuing Our Path to Reconciliation: Indigenous Engagement and Inclusion—An Update\*](#). Our work to date has been values-driven, focused on collaboration and has taken shape in our lifecycle approach to engagement and supply chain opportunities, and employment, education, and Indigenous cultural awareness initiatives.

While much work has been done, there is much more to do.  
We have a responsibility to continue moving forward.

This, our first Indigenous Reconciliation Action Plan (IRAP), is an opportunity to continue our unwavering commitment to reconciliation. These tangible, measurable and publicly reportable commitments help to further underpin our [\*Indigenous Lifecycle Engagement Framework\*](#) by forming the next stage of our journey towards reconciliation, and support the transition towards a cleaner energy future in partnership and collaboration with Indigenous peoples.

Our commitments will require continued collaboration, patience, and a resolute commitment to advancing reconciliation. These commitments permeate across each of our four core businesses

within Enbridge, transcend geographic borders and require us to focus on our role as an energy company whose projects and operations span Treaty and Tribal lands, the National Métis Homeland, unceded lands and the traditional territories of Indigenous Nations, Tribes, Governments and Groups (Indigenous groups)<sup>2</sup> across Turtle Island. Enbridge has consulted and engaged with more than 340 Indigenous groups in Canada and the United States.

We also acknowledge and express our gratitude to the 50 individuals from Indigenous groups across Canada and the United States who provided valued input early on in our IRAP development process, and whose insights have helped shape our commitments and the priorities for this continued journey towards reconciliation. Thank you – for your honesty, your willingness to engage, and your thoughtful contributions – all of which help direct the trajectory of this journey to reconciliation and a sustainable energy future.

Through this IRAP, and the actions we will undertake to support and advance our 22 commitments, we must create opportunities – for dialogue, for listening, for knowledge transfer, and for collaboration and partnership with Indigenous groups. Put simply, reconciliation is supported by creating connections, and furthered by building bridges that connect recognition of the past to a shared vision for the future.

## IRAP vision and values

At Enbridge, our core values – Safety, Integrity, Respect and Inclusion – reflect what is truly important to us as a company. These values represent the “north star” for our organization, a constant beacon by which we make our decisions, as a company and as individual employees, every day. In 2020, we invested time and energy listening to our employees speak about their experiences, including the barriers faced by Indigenous peoples. This engagement resulted in the addition of inclusion as a core value. We are committed to upholding these values as we collectively walk a path to reconciliation.

Our name, Enbridge, has long conveyed our commitment to being a bridge and leading the way to a safer, cleaner and more sustainable energy future. We recognize we have an important role to play in building bridges toward reconciliation and in collaborating with Indigenous peoples on the energy transition as we seek to be the leading energy infrastructure company in North America.

### **Our vision for this IRAP is that it will:**

- Guide us on our continued journey to reconciliation
- Unite and focus us in our efforts to continue to build and nurture respectful and mutually beneficial relationships with Indigenous peoples
- Enable us to collaboratively create a safer, and more accountable, respectful, sustainable and inclusive future for seven generations<sup>3</sup> and beyond

We believe we can achieve more together – collaboratively, respectfully, purposefully and transparently.

<sup>3</sup> “Seven generations” is an Indigenous sustainability principle that says that we should consider how every decision will impact and affect those seven generations into the future.

## About this IRAP

This IRAP is organized into six pillars and outlines a total of 22 commitments. Full details and targets are provided in the pages that follow.

These pillars represent our priorities, a cornerstone of our commitment to reconciliation, each collaboratively developed with the input of Indigenous individuals and groups. Our pillars will endure, and while the commitments may evolve over time, we expect each pillar will remain stable and consistent. Enbridge will develop tools and mechanisms to support and execute on these commitments on our path towards reconciliation.

We will publicly report on our progress against these commitments annually, starting with an update on our progress in our 2023 Sustainability Report.

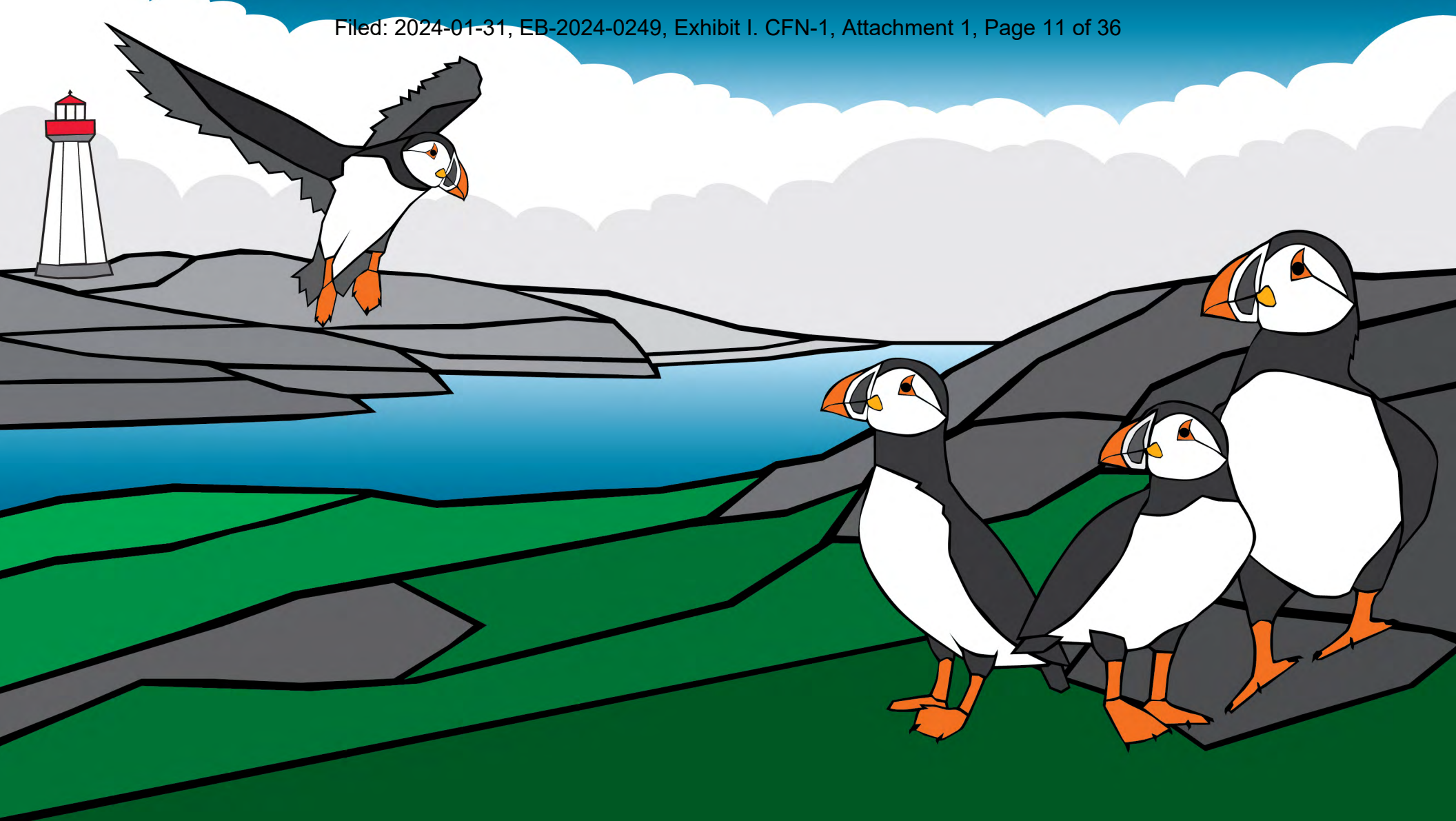


### SIX PILLARS

- 1** People, employment and education
- 2** Community engagement and relationships
- 3** Economic inclusion and partnerships
- 4** Environmental stewardship and safety
- 5** Sustainability, reporting and energy transition
- 6** Governance and leadership



# Reconciliation Action Pillars



**PILLAR 1**

**People, employment  
and education**

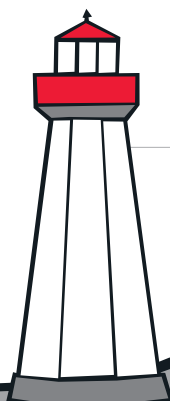
Enbridge is committed to creating and nurturing organizational structures that support opportunities to attract, retain and develop the skills of Indigenous people at all levels and in positions that make Enbridge the place to build their careers in a culturally supportive work environment.

PILLAR 1

## People, employment and education

Focus	Commitment	Details	Target/Goal	Timeline
Talent attraction and recruiting	Establish flexible work placements and opportunities for Indigenous peoples that account for regional and cultural considerations across Canada and the United States	<ul style="list-style-type: none"> <li>In addition to current organizational workplace flexibility options, identify and develop opportunities for roles in other locations where there might be increased availability of Indigenous applicants</li> <li>Identify and resolve employment barriers for current and future Indigenous employees</li> <li>Explore updating leaves policies to reflect cultural inclusivity</li> </ul>	<ul style="list-style-type: none"> <li>Update Indigenous engagement employment program to account for Indigenous culture, regional/remote considerations and legal considerations, as appropriate</li> <li>Explore establishing a cultural leave program</li> </ul>	2022 – Ongoing
	Continue to seek and strive to increase Indigenous representation in Enbridge's permanent workforce	<ul style="list-style-type: none"> <li>Continue to review and develop Indigenous employment data and report annually</li> <li>Work with Indigenous groups and training partners to identify current opportunities and key growth areas for employment and skills development</li> <li>Explore new partnerships to grow talent pool and implement Indigenous recruitment strategies with the goal of increasing awareness of opportunities at Enbridge</li> </ul>	<ul style="list-style-type: none"> <li>Continue to report metrics and provide annual disclosure</li> <li>Identify key growth areas for employment and skills development</li> <li>Establish partnership with Indigenous employment agency</li> <li>Attend at least eight (8) Indigenous-focused career fairs throughout Canada and the United States</li> <li>Attempt to reach our previously established goal of a minimum of 3.5% of proportional Indigenous representation<sup>4</sup></li> </ul>	2025

<sup>4</sup> All percentages or specific goals regarding inclusion, diversity, equity, and accessibility are aspirational goals which we intend to achieve in a manner compliant with state, local, provincial, and federal law, including, but not limited to, U.S. federal regulations and Equal Employment Opportunity Commission, Department of Labor and Office of Federal Contract Programs guidance.



Focus	Commitment	Details	Target/Goal	Timeline
<b>Talent attraction and recruiting</b>	Continue to review internal hiring processes and develop human resource capability to ensure all perspectives are reflected through attraction/retention lifecycle	<ul style="list-style-type: none"> <li>• Review existing talent policies and procedures to identify gaps and implement changes to ensure cultural perspectives and priorities are reflected throughout process(es)</li> <li>• Continue to conduct regular training with Talent Acquisition team on ways to conduct culturally sensitive interviews (e.g., understanding Indigenous cultural differences, uncovering hiring biases, interviewee evaluation criteria)</li> <li>• Where allowed by law, formalize Indigenous attraction/retention programming for diversity, cultural, regional and remote considerations</li> </ul>	<ul style="list-style-type: none"> <li>• Review and, where appropriate, update internal hiring processes</li> <li>• Conduct ongoing and regular training with Talent Acquisition team related to hiring practices</li> <li>• Explore development of policies/procedures to support Indigenous attraction/retention programs</li> </ul>	2022 – Ongoing
<b>Talent experience and development</b>	Increase representation of Indigenous employees within Enbridge’s Leadership Development Program to support the retention and advancement of Indigenous employees	<ul style="list-style-type: none"> <li>• Continue to support Indigenous employees through consultation, mentorship, onboarding, coaching and connection</li> <li>• Develop and diversify pools of candidates for apprenticeship and internship programs</li> <li>• Continue to identify and develop succession plans free from unconscious bias across the company</li> </ul>	<ul style="list-style-type: none"> <li>• Explore expansion of programs and opportunities for the growth of Indigenous employees/employee base</li> </ul>	2023 – Ongoing

\* Please note that bargaining unit employees are subject to the terms and conditions of their collective bargaining agreement.

**PILLAR 1**

**People, employment and education**

Focus	Commitment	Details	Target/Goal	Timeline
<b>Cultural support programs</b>	Continue to develop and maintain cultural support programs to make Enbridge an attractive and welcoming employer for all people, including Indigenous peoples	<ul style="list-style-type: none"> <li>• Continue to include and develop Indigenous Employee Resource Groups across the company</li> <li>• Expand programs related to Sharing Circles and Indigenous employee support across the company</li> <li>• Continue to create culturally inclusive and safe spaces across the company that are supportive and celebrate Indigenous arts and culture.</li> <li>• Develop a regional-based implementation model inclusive of diverse perspectives across the company</li> <li>• Establish an Elder connections program to give employees direct access to Indigenous Elders for advice and cultural support</li> </ul>	<ul style="list-style-type: none"> <li>• Continue to implement and expand cultural support programs</li> <li>• Integrate Indigenous arts and culture in Enbridge offices and facilities across Turtle Island</li> </ul>	2023 – Ongoing
<b>Learning and awareness</b>	Ensure 100% of Enbridge’s employees complete Indigenous awareness training	<ul style="list-style-type: none"> <li>• Ensure opportunities exist for employees to develop a deeper understanding of the history, rights, culture and knowledge of Indigenous peoples by completing online or in-person cultural awareness training</li> <li>• Explore tailored training for groups across Enbridge, as needed</li> <li>• Track and monitor completion statistics of required Indigenous Awareness Training</li> </ul>	<ul style="list-style-type: none"> <li>• 100% employee participation in cultural awareness training</li> <li>• Ensure every new Enbridge employee receives cultural awareness training as a requirement</li> </ul>	2022



PILLAR 1

## Spotlight: Gas Distribution and Storage Mentorship Program

As an example of forging new pathways and living our values—the Gas Distribution and Storage (GDS) Mentorship Program aims at reducing barriers and increasing opportunities for Indigenous recruitment and employment.



> Wendy Landry (left) and previous mentorship participant, now full-time Enbridge employee, Lauryn Graham (right) pose next to the Enbridge sign in Eastern Region.

Enbridge’s Gas Distribution and Storage (GDS) Northern Mentorship Program, now in its fourth year, was founded when our Northern Region team in GDS recognized their approach to recruit local Indigenous talent for various positions over several years was largely unsuccessful. “We have a duty to reflect the communities we serve, yet we struggled to attract local Indigenous talent after years of effort and commitment,” said Luke Skaarup, former Director Northern Region Operations GDS and now Director Operations Services for Enbridge’s Liquids Pipelines Operations. “We needed to work collaboratively both internally and externally to course correct.”

The team sought approval for and actioned the re-purposing of Enbridge’s co-operative and summer student roles for Indigenous mentorship and engaged with local Indigenous groups and unions to reduce the very real barriers to entry into Enbridge – and more generally, corporate Canada – by enhancing the accessibility of our job postings, inviting initial discussions and conducting interviews within communities. They provided recognition for relevant lived experience in addition to professional experience.

“ The success in identifying and connecting candidates with positions came from the commitment and foresight of early champions of this program and a willingness to depart from the normalized hiring processes that create barriers to entry for some Indigenous candidates. ”

– Wendy Landry, Enbridge Senior Indigenous Initiatives and Engagement Advisor

**PILLAR 1**

**Gas Distribution and Storage Mentorship Program continued**

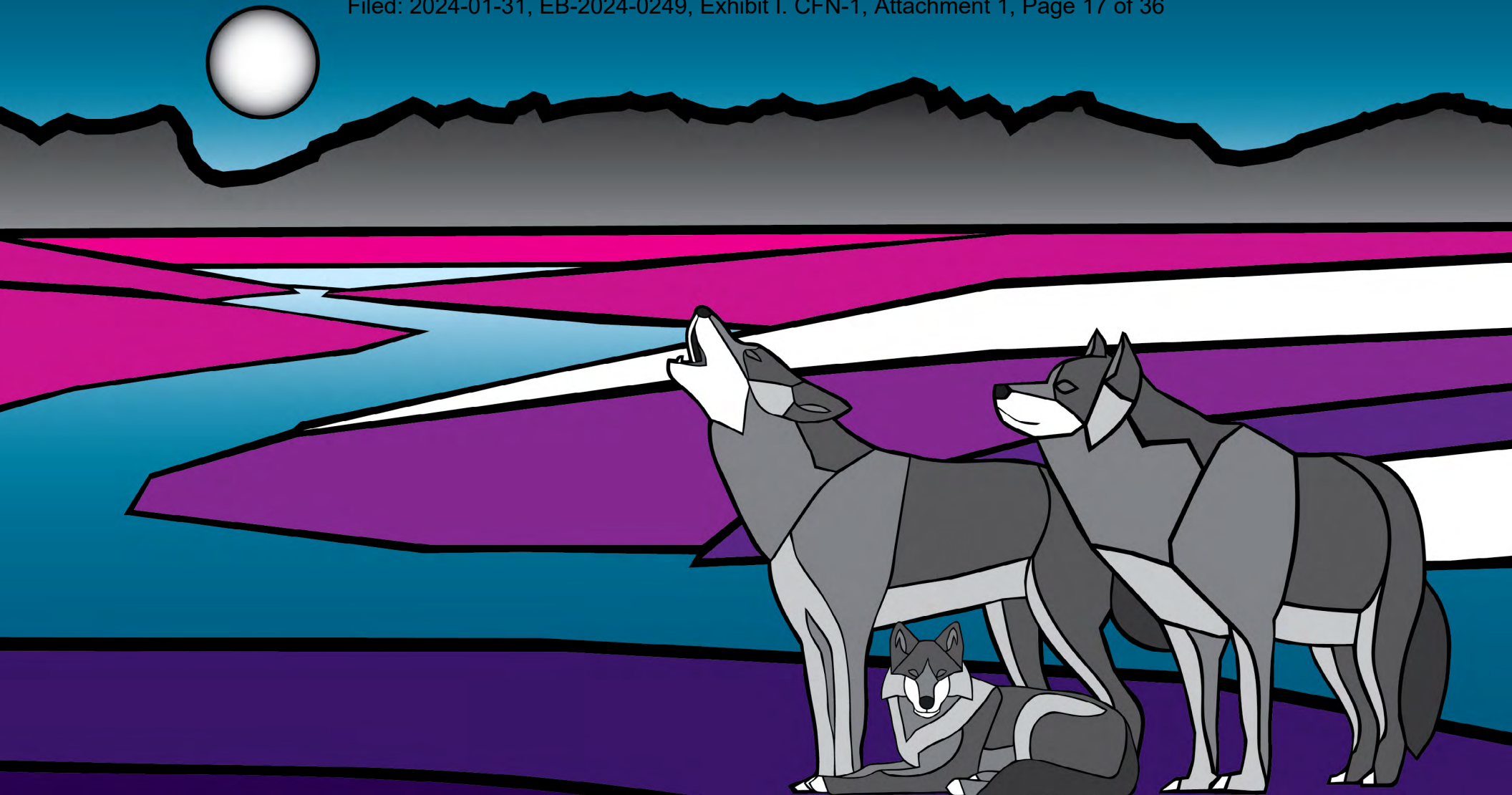
“The success in identifying and connecting candidates with positions came from the commitment and foresight of early champions of this program, and a willingness to depart from the normalized hiring processes that create barriers to entry for some Indigenous candidates,” said Wendy Landry, Red Rock Indian Band member, Mayor of Shuniah and Senior Indigenous Initiatives and Engagement Advisor to Enbridge. While there is more work to do, this program has helped develop capacity by identifying where there were gaps in the recruitment and hiring process and how best to address those gaps to create pathways to employment – with Enbridge or elsewhere in the energy industry.

The team focused internally on identifying pathways to fulltime employment, on implementing a mentorship program, and approached recruitment and hiring in a more culturally sensitive and respectful manner.

In 2021, the Northern Region team in GDS hired four mentees with an additional Indigenous employee successfully competing for a fulltime construction laborer position. We also partnered with the Métis Nation of Ontario as part of a Métis Youth Internship Program to on-board one additional hire to our construction team, and Distribution Operations initiated an Indigenous Community Outreach program as part of its diversity and inclusion strategy.

Enbridge is focused on expanding the mentorship program across GDS in Ontario in 2022, along with the implementation of an internal awareness campaign to increase understanding and support for Indigenous partnerships and collaboration.

Opportunities for dialogue and engagement with current and potential employees, including through the Indigenous Employment Resource Group and the Indigenous Sharing Circle, mean our journey of learning and adapting continues to inform the evolution of our Indigenous recruitment commitment. The entire team continues to identify mechanisms to enhance our accessibility, recruitment, retention and education practices.



**PILLAR 2**

# **Community engagement and relationships**

Enbridge understands meaningful engagement and respectful relationships are foundational to advancing reconciliation. We are committed to developing strategies, mechanisms and opportunities that support and nurture dialogue and engagement between Enbridge and Indigenous groups throughout the lifecycle of our projects and operations.

**PILLAR 2**

**Community engagement and relationships**

Focus	Commitment	Details	Target/Goal	Timeline
<b>Feedback mechanism</b>	Develop an incremental formal mechanism for Indigenous groups to provide feedback to Enbridge	<ul style="list-style-type: none"> <li>In addition to ongoing engagement activities, and in consultation with Indigenous peoples, develop an incremental transparent feedback mechanism to facilitate input from potentially impacted Indigenous groups such as questions, concerns, and opportunities for collaborations related to Enbridge's projects and operations</li> </ul>	<ul style="list-style-type: none"> <li>Establish and launch feedback mechanism</li> </ul>	2023 – Ongoing
<b>Community engagement and relationships</b>	Provide \$80 million in cumulative funding support for engagement priorities, community capacity building and fostering wellbeing over the next five years	<ul style="list-style-type: none"> <li>In addition to Enbridge's Indigenous contracting and procurement spend, these funds are intended to support community capacity and wellbeing. This may include dollars from relationship agreements, taxes paid and/or corporate/regional community investment</li> </ul>	<ul style="list-style-type: none"> <li>\$80 million in cumulative funding over five years</li> </ul>	2022 – 2027

**PILLAR 2**

## **Spotlight: Patrick Hunter mural**

How an art installation ignites and inspires conversation and connection to each other, the land and Indigenous culture and history.



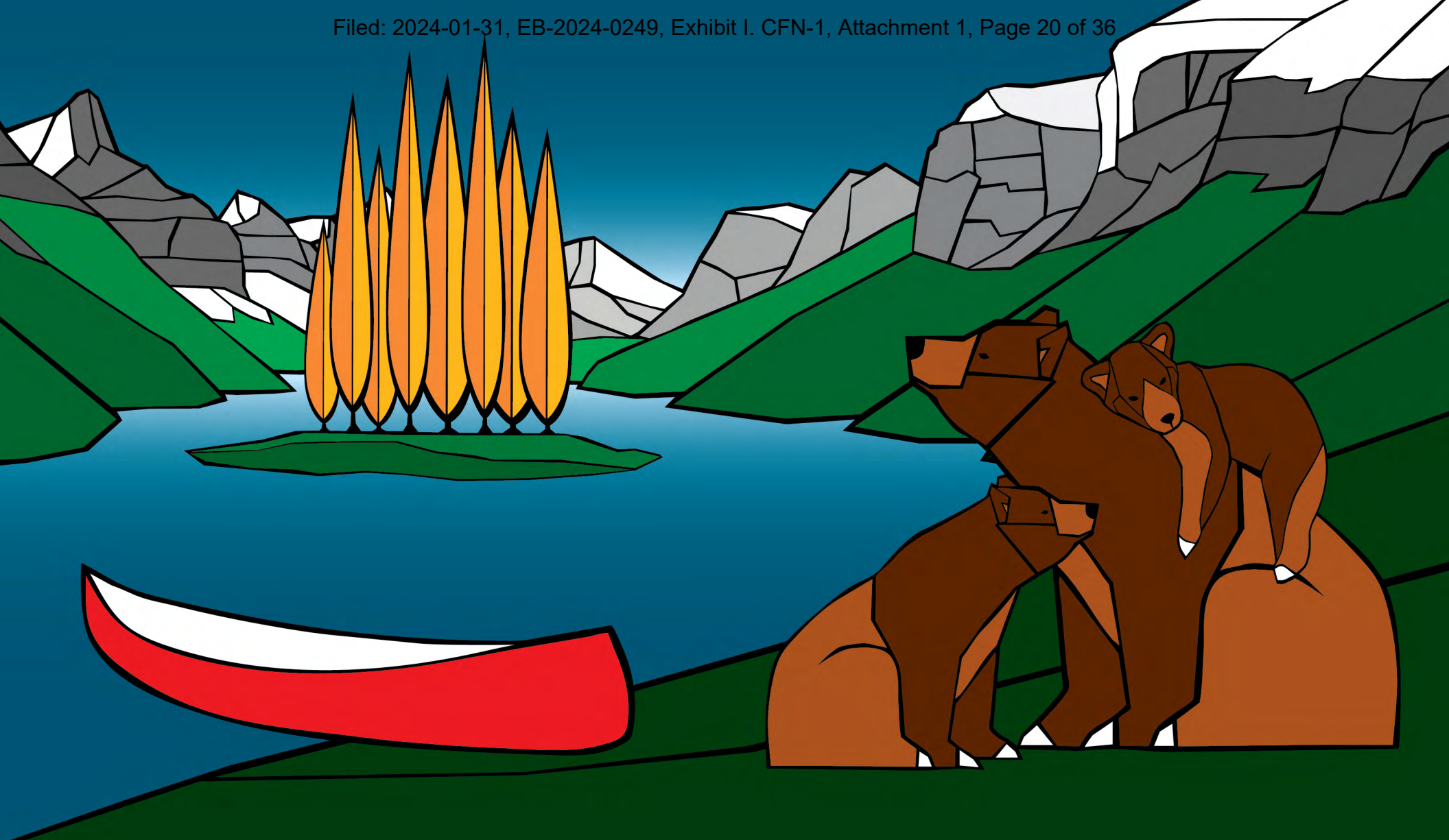
“ I think it’s important for companies today to realize the land they are on was once another culture’s territory. Public acknowledgments of that fact are such a great first step towards being on the right side of history. ”

– Patrick Hunter, Ojibway artist

Patrick Hunter is a two Spirit Ojibway artist, graphic designer and entrepreneur from Red Lake, Ontario. Patrick is one of Canada’s well-known Woodland artists, gaining inspiration from his homeland, painting what he sees through a spiritual lens, with the intent to create a broader awareness of Indigenous culture and iconography. Among his many projects are artwork he created for the Canadian Olympic Curling Team, the Chicago Blackhawks and Hockey Night in Canada.

In 2021, Enbridge commissioned Patrick to create two original pieces of art that could be digitized and used as murals in GDS facilities across Ontario. The pieces are installed in two locations: the third floor of the 50 Keil Drive office in Chatham, and the first floor of the Victoria Park Centre in Toronto. Both pieces represent the start of a longer-term project to prominently display a collection of original Indigenous artwork.

The murals, designed specifically for Enbridge, embody Patrick’s personal reflections on and spiritual connection to the land and Indigenous territories in and around Ontario on which our GDS offices reside. They create awareness of Indigenous culture and history of the lands on which we work and live and connect us back to the natural world, something increasingly difficult to do in our urban environment. Not least, and perhaps most profoundly, they invite and ignite conversation, furthering our connections to each other and creating opportunities for dialogue, learning and reflection on our individual and collective journeys towards reconciliation.



**PILLAR 3**

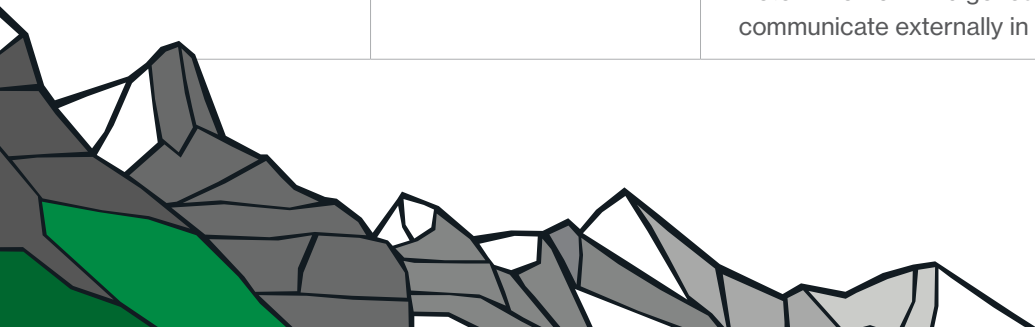
**Economic inclusion  
and partnerships**

Enbridge strives to create, engage in, and stimulate positive and mutually beneficial financial impacts, opportunities and potential partnerships with Indigenous groups and businesses.

**PILLAR 3**

**Economic inclusion and partnerships**

Focus	Commitment	Details	Target/Goal	Timeline
<b>Indigenous financial partnerships</b>	Revise and formalize Indigenous financial partnership processes that encourage strategies to provide opportunities for Indigenous economic participation	Establish a formal Indigenous Economic Development Taskforce to formalize processes that will: <ul style="list-style-type: none"> <li>• Leverage business units' and project teams' insights to establish standards and criteria for financial partnerships within the company's investment review processes</li> <li>• Identify and review previous successes to develop financial opportunities that account for various regulatory, legal and socio-economic considerations</li> <li>• Undertake a review of the Indigenous financial capacity landscape and access to capital to ensure Enbridge facilitates opportunities that can be implemented</li> <li>• Engage with Indigenous groups to seek feedback and assess alignment between Enbridge's processes, market opportunities and new opportunities for Indigenous economic participation</li> </ul>	<ul style="list-style-type: none"> <li>• Develop Indigenous Economic Development Taskforce</li> <li>• Formalize processes and strategies for Indigenous economic participation</li> <li>• Implement new partnership processes and strategies that foster early engagement with Indigenous groups</li> <li>• Ensure Indigenous perspectives are included within review and development process(es)</li> </ul>	2022 – Ongoing
<b>Supplier capacity development</b>	Advance opportunities for Indigenous businesses to participate in Enbridge's supply chain	<ul style="list-style-type: none"> <li>• Develop and conduct information sessions over two years to provide guidance and education to Indigenous businesses seeking participation in Enbridge's supply chain</li> <li>• Continue to provide support for Indigenous businesses navigating Enbridge's procurement system</li> </ul>	<ul style="list-style-type: none"> <li>• Develop and conduct at least eight information sessions over two years</li> </ul>	Ongoing
<b>Indigenous procurement</b>	Establish Indigenous spend targets	<ul style="list-style-type: none"> <li>• Continue to establish benchmarks for Indigenous spend targets</li> <li>• Determine 2024 Indigenous spend targets and communicate externally in 2023</li> </ul>	<ul style="list-style-type: none"> <li>• Determine and disclose Indigenous spend targets</li> </ul>	2023





**PILLAR 3**

**Spotlight:  
Indigenous economic inclusion in gas  
transmission expansion projects in  
British Columbia**

An expansion of B.C.'s gas transmission system created mutual opportunities and benefits for Indigenous businesses and Enbridge and shone a spotlight on the far-reaching impact and importance of Indigenous economic inclusion.

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Enbridge is the owner and operator of British Columbia's (B.C.) major gas transmission system, connecting the province's natural gas exploration and production industry with millions of consumers and heating homes, businesses, hospitals and schools in B.C., Alberta, and the U.S. Pacific Northwest. Gas also fuels electric power generation and is a staple in many industrial and manufacturing processes.

In the fourth quarter of 2021, we completed two capital expansion projects – the T-South Reliability Expansion Project (TSRE) and the Spruce Ridge Expansion Program (Spruce Ridge). Enbridge conducted upgrades and reliability enhancements and expanded the capacity of the gas transmission system in B.C.

TSRE work included the installation of five new compressor units and associated equipment at five existing compressor stations, two

These projects were completed with significant Indigenous engagement, participation and collaboration. In fact, the spend with Indigenous contractors in B.C. nearly doubled between 2018 and 2021.



compressor station cooler additions and three pipeline crossover projects. Twenty-four Indigenous groups participated and benefited economically, with Indigenous businesses securing and executing an aggregate of \$54.7 million in contracts and subcontracts.

Spruce Ridge work involved the building of two new natural gas pipeline loops (the 13-km Aitken Creek Loop and the 25-km Chetwynd Loop), the addition of a new compressor unit at two compressor stations and some additional minor modifications at above-ground facilities. Nine Indigenous groups benefitted economically through subcontracting opportunities for an aggregate \$66.6 million worth of contracts and subcontracts, including the award for construction of the Aitken Creek Loop to an Indigenous partner business.

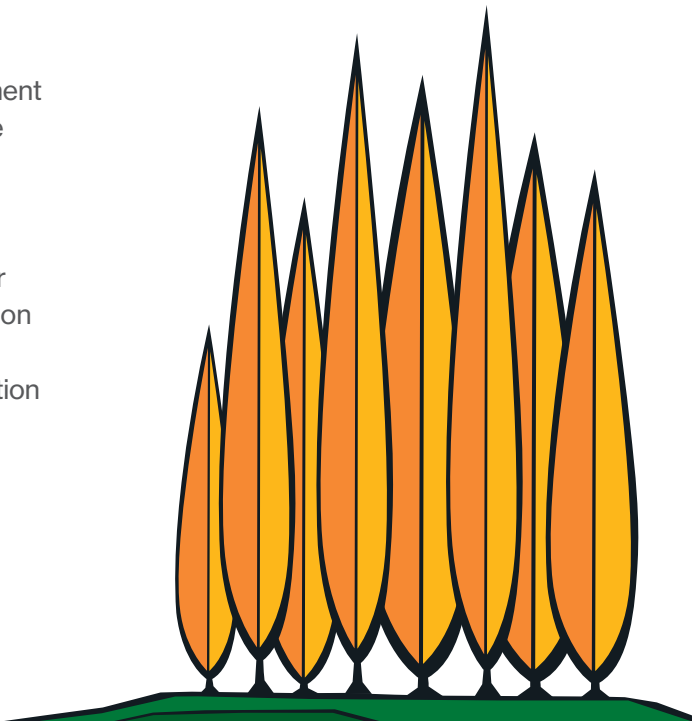
As we have walked this path towards reconciliation through the years, there have been pivotal moments along the way that have increased the momentum of our journey and created fundamental shifts in the way we do business. The focus on and implementation of measures to increase Indigenous economic inclusion and engagement is one such example of Enbridge's commitment on this journey.

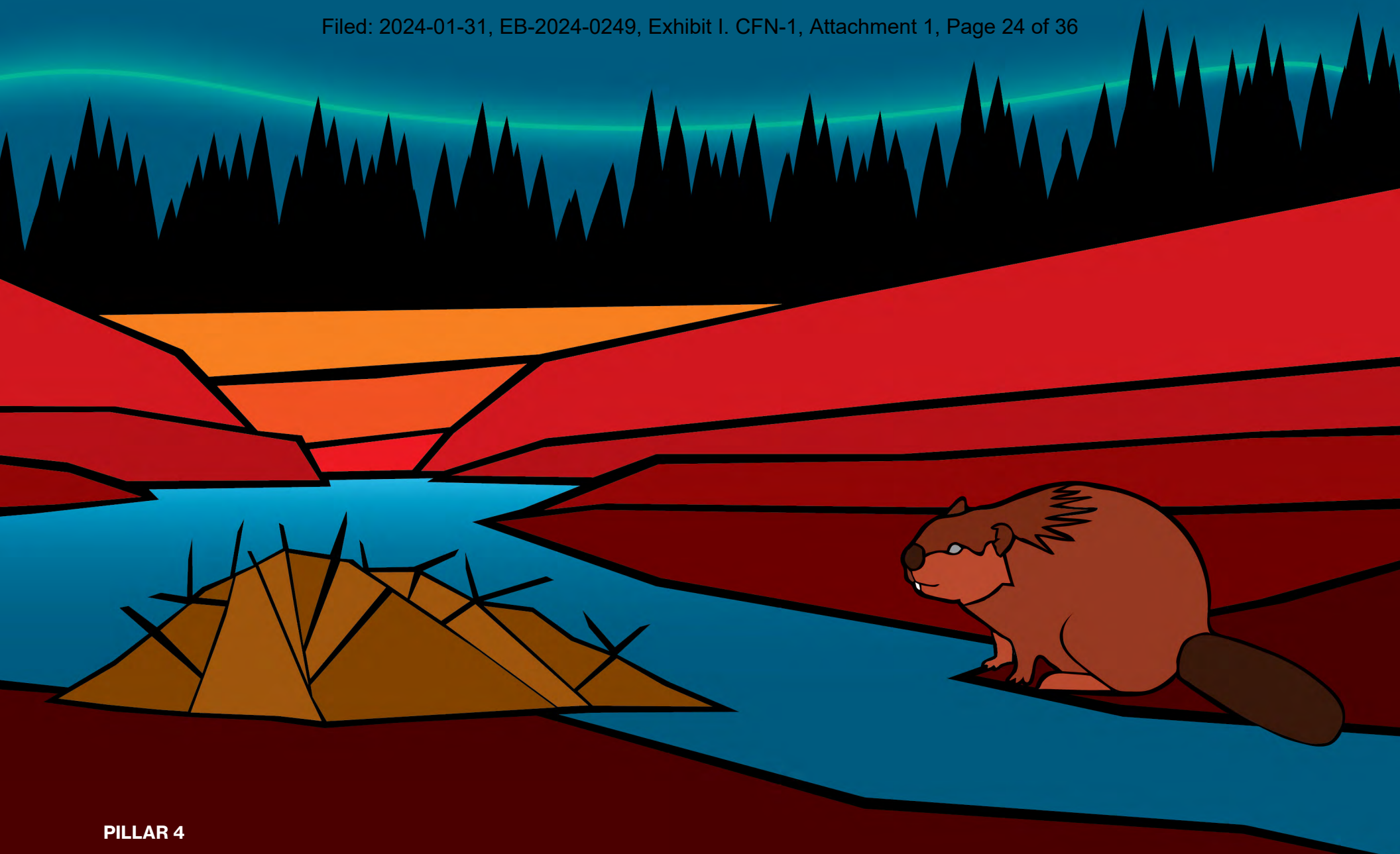
The roll-out of Enbridge's Socio-Economic Requirements of Contractors (SERC) process in 2017 coincided with early engagement activities with Indigenous groups on TSRE and Spruce Ridge. The SERC guides our contractors on how we expect them to include Indigenous businesses in the execution of their work, as well as efforts to increase the use of Indigenous businesses as general contractors working directly for Enbridge. Each component of our focus on increased Indigenous economic engagement and inclusion was complemented by other mechanisms driving an increase in Indigenous economic inclusion and included targeted pre-qualification

of Indigenous businesses; strategic direct award opportunities for Indigenous businesses to increase capacity and experience; and a focus on increasing capacity with Indigenous archaeology companies.

“Embracing relationships with Indigenous groups – giving them the opportunity to have a seat at the table, provide input on projects and to capitalize on opportunities is a big part of what reconciliation is [and to a further extent the implementation of UNDRIP in our daily lives],” said Chief Willie Sellars of Williams Lake First Nation.

“In addition, it's important to keep in mind the cultural, ceremonial, and traditional components of our way of life and incorporating that understanding and respect into projects. The TSRE ground-breaking at Compressor Station 6A 150 Mile House included a ground blessing, prayers and songs and provided an opportunity to introduce those present to our way of life and our traditions. This is so important as reconciliation requires education for people to be able to understand, to heal and to move forward. We are pleased to be able to work with Enbridge on this important journey towards reconciliation.”





**PILLAR 4**

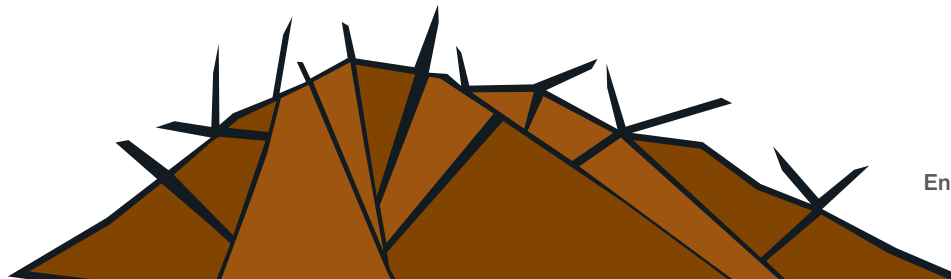
# **Environmental stewardship and safety**

Enbridge recognizes the strong Indigenous connection to culture and the traditional importance of the land, air, animals and water. We are committed to environmental protection, collaborative stewardship, and continued improvement of engagement on, and inclusion of traditional and cultural knowledge in our plans, projects and operations.

**PILLAR 4**

**Environmental stewardship and safety**

Focus	Commitment	Details	Target/Goal	Timeline
<b>Indigenous inclusion and traditional knowledge</b>	Review and revise Enbridge’s approach to Indigenous inclusion in the environmental review processes	<ul style="list-style-type: none"> <li>Assess current approach and identify opportunities for increased Indigenous inclusion and strengthening Enbridge’s current mitigation strategies</li> </ul>	<ul style="list-style-type: none"> <li>Confirm and utilize a phased approach to revise Enbridge’s environmental review processes, as needed</li> </ul>	2022 – Ongoing
	Regionally advance opportunities for Indigenous inclusion in environmental field work	<ul style="list-style-type: none"> <li>Regionally identify and advance opportunities for Indigenous participation in environmental field work</li> </ul>	<ul style="list-style-type: none"> <li>Increase Indigenous involvement in fieldwork</li> </ul>	2022 – Ongoing
<b>Emergency preparedness and pipeline safety</b>	Continue to share emergency management materials and encourage increased Indigenous awareness in emergency response	<ul style="list-style-type: none"> <li>Continue to share emergency management materials with Indigenous groups</li> <li>Continue to generate awareness and provide opportunities for participation in emergency response exercises</li> </ul>	<ul style="list-style-type: none"> <li>Continue to share relevant emergency management materials to generate awareness</li> </ul>	2022 – Ongoing
	Continue to communicate with Indigenous groups regarding emergency and safety mechanisms and approaches	<ul style="list-style-type: none"> <li>Continue to provide notifications to Indigenous groups to ensure they are aware and engaged in the event of releases from pipeline systems</li> <li>Develop a consistent process or protocol to share environmental and safety notices to Indigenous groups</li> </ul>	<ul style="list-style-type: none"> <li>Proactively communicate with Indigenous groups through release notifications</li> </ul>	2022 – Ongoing



**PILLAR 4**

## **Spotlight: Pontiac Township High School pollinator plot and Kickapoo Nation**

An opportunity to advance sustainability commitments and facilitate connections that may endure for seven generations and beyond.

The Operation Endangered Species (OES) program was started in 2011 near Pontiac, Illinois, a brainchild of a group of Pontiac Township High School (PTHS) students with a biodiversity conservation initiative idea. The students approached their high school environmental science teacher with an idea to reintroduce endangered species on community pollination plots that would benefit surrounding agricultural land. The OES program at PTHS has raised US\$150,000 over nine years to support the reintroduction of a species of reptile back to its native historic home range in Illinois.

Following a US\$10,000 grant from Enbridge to establish a pavilion on a nearby company-owned 20-acre pollinator plot, students from the PTHS Environmental Earth class set out to develop the land into a pollinator plot, planting native prairie grasses and other vegetation to encourage development of the natural ecosystem. In 2021, Enbridge donated the pollinator plot to PTHS and the OES program to facilitate the continuation of this meaningful and impactful conservation and community work and as part of our commitment to [sustainability](#).

Upon completion of the land transfer, the U.S. History students of Pontiac began researching the origins of the land. They wanted to integrate respect for Indigenous groups into their ultimate use of the plot. Through this research, the students learned the land being

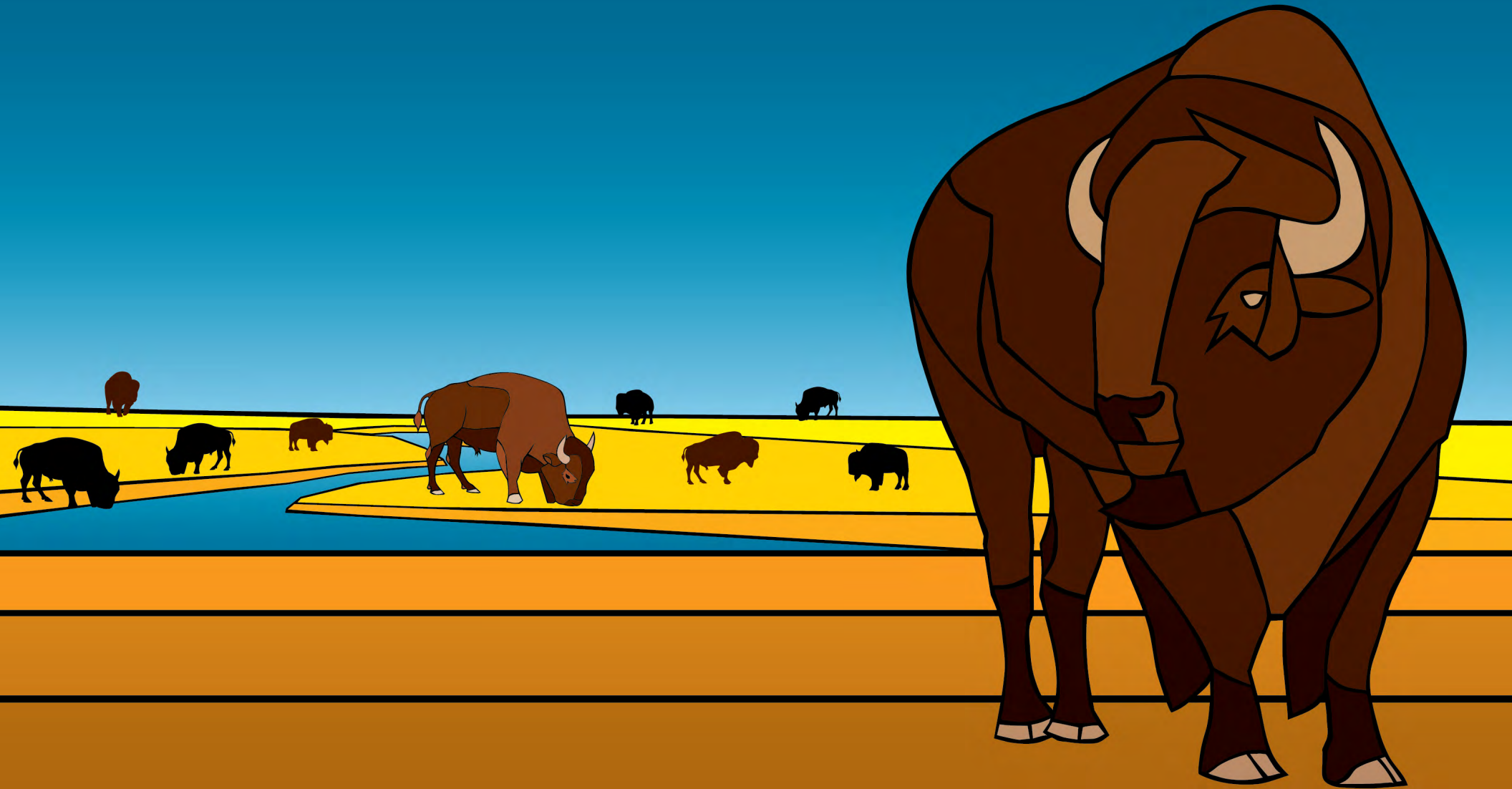
developed as a pollinator plot in Illinois is within the ancestral lands of the Kickapoo tribe, which was one of 25 tribes forcibly relocated to Kansas between 1825 and 1850.

Through Enbridge's relationships with all parties, we were able to facilitate an introduction between PTHS, the Kickapoo tribe and the Odawa tribe, which has blossomed into a mutually respectful and engaged relationship where teachings about care and respect for the earth and ecology now occur on a weekly basis. Furthermore, Kickapoo spiritual leaders and PTHS students continue to find ways to weave cultural teachings and education opportunities together and a deep and mutual respect has been formed.

In upholding our vision for our IRAP and our role in reconciliation, we are proud to be able to facilitate connections that promote and support further learning and pathways to reconciliation that may have positive and permeating impacts for generations to come.

“ I've always believed that giving students opportunities and enabling them is the most impactful way to support them on their learning journey. The cultural learning and growth that occurred here was driven by the students, but Enbridge was a major part in helping facilitate that for them. ”

– Paul, teacher at Pontiac Township High School



PILLAR 5

## Sustainability, reporting and energy transition

Enbridge is committed to forming strategies and collaborative partnerships with Indigenous groups focused on advancing the energy transition to a low-carbon economy and transparently reporting on our progress against our commitments.

**PILLAR 5**

**Sustainability, reporting and energy transition**

Focus	Commitment	Details	Target/Goal	Timeline
Reporting	Report and disclose progress on IRAP commitments in ESG and Sustainability Report	<ul style="list-style-type: none"> <li>• Increase transparency by addressing progress of IRAP commitments in annual Sustainability Report</li> </ul>	<ul style="list-style-type: none"> <li>• Disclose progress via annual Sustainability Report</li> </ul>	2023 – Ongoing
	Refresh IRAP commitments and goals every two years	<ul style="list-style-type: none"> <li>• Refresh IRAP commitments and goals every two years in conjunction with input from Indigenous groups, IRAP working group, employees and Executive Leadership Team</li> </ul>	<ul style="list-style-type: none"> <li>• Publish updated IRAP commitments/ goals every two years</li> </ul>	2024 – Ongoing
Sustainability	Facilitate a thought leader roundtable related to Indigenous inclusion and perspectives in sustainability strategy and policies	<ul style="list-style-type: none"> <li>• Identify key organizations/industry partners for inclusion in thought leader roundtable discussion</li> <li>• Work with roundtable participants to identify relevant topics related to sustainability, climate change, Indigenous perspectives and reconciliation that further support action, identify pathways towards implementation and build capacity within Indigenous groups to support implementation</li> <li>• Conduct roundtable(s) with participation from Indigenous groups and industry peers</li> </ul>	<ul style="list-style-type: none"> <li>• Establish partnership(s) with Indigenous-led organizations and relevant industry peers</li> <li>• Convene at least one thought leader roundtable</li> <li>• Consider the findings and Indigenous perspectives shared at the round table(s) when Enbridge sustainability strategies and policies are updated</li> </ul>	2023

PILLAR 5

## Spotlight: The Wabamun Carbon Hub—advancing carbon capture and storage and Indigenous partnership

A “Hub” of innovation and collaboration—the Open Access Wabamun Carbon Hub creates opportunities to advance partnerships and ownership in new energy projects with Indigenous groups.



> From left to right, Chief George Arcand Jr. (Alexander First Nation), Chief Arthur Rain (Paul First Nation), Chief Tony Alexis (Alexis Nakoda Sioux Nation), and former Chief Billy Morin (Enoch Cree Nation) of the First Nations Capital Investment Partnership, partners with Enbridge to pursue ownership in future carbon transportation and storage projects.

In the fight against climate change, the International Energy Agency calls Carbon Capture and Storage (CCS) one of the world’s most critical carbon reduction technologies.

As countries like Canada aim to achieve net-zero emissions by 2050, the capture and permanent deep underground storage of carbon dioxide (CO<sub>2</sub>) is being touted as a vital component of global efforts to contain those emissions from heavy industrial processes, including power generation, cement production and conventional energy production and refining.

One CCS project under development is our Open Access Wabamun Carbon Hub (the Hub) to be located west of Edmonton, Alberta, Canada.

The Hub would support recently announced carbon capture projects by Capital Power Corporation and Lehigh Cement, which represents an opportunity to avoid nearly four million tonnes of atmospheric CO<sub>2</sub> emissions – the equivalent of taking more than 1.2 million cars off the road annually.

The Hub will remain open access for other nearby capture projects and once built, will be one of the world’s largest integrated carbon transportation and storage projects, effectively doubling the amount of CO<sub>2</sub> captured and stored today in Canada.

Engagement and dialogue about the Hub started early with Indigenous groups – even before the project was a project. The initial conversations took a “blank sheet of paper” approach and focused on

## PILLAR 5

### The Wabamun Carbon Hub—advancing carbon capture and storage and Indigenous partnership continued

opportunity and what could be. Through listening, learning, and acting in parallel, a partnership on the journey along this energy transition and in advancing carbon reduction, was formed.

In February 2022, Enbridge and the First Nation Capital Investment Partnership (FNCIP) [announced a partnership agreement](#) to advance the Hub. The FNCIP was formed by four Treaty 6 Nations – Alexander First Nation, Alexis Nakota Sioux Nation, Enoch Cree Nation, and Paul First Nation – to pursue ownership in major infrastructure projects with commercial partners who share Indigenous values. The Hub is the FNCIP's first partnership. The Lac Ste. Anne Métis community will also have an opportunity to pursue ownership in future carbon transportation and storage projects with the Hub.

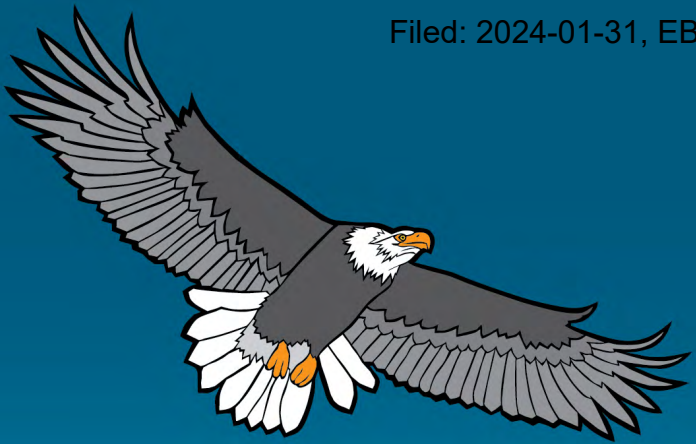
Critically, the Hub's Indigenous partners will have an opportunity to own up to 50% of the carbon transportation and storage projects developed in connection with the Hub. This openness to co-own and co-develop the assets is ground-breaking. These projects will create long-term, stable revenues for local Indigenous groups.

“ This path creates an opportunity to generate wealth, but more importantly it allows sustainable economic sovereignty for our communities. We are creating a healthy future for the next seven generations to thrive.

We're looking forward to working with industry leaders who share our values of environmental stewardship and to collaborate with Enbridge on world-scale carbon transportation and storage infrastructure investments. ”

– Chief George Arcand Jr., Alexander First Nation





PILLAR 6

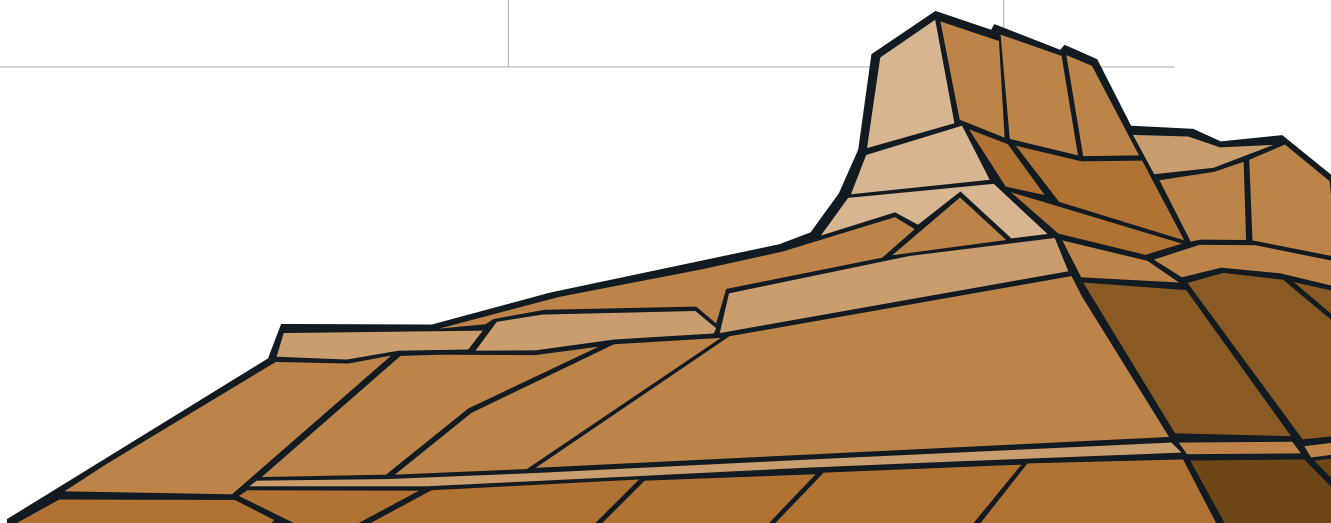
# Governance and leadership

Enbridge is committed to the creation and support of governance and leadership structures that focus on embedding and promoting accountability for Indigenous engagement and inclusion across the organization. We will lead by example and hold each other accountable for the commitments we make on our reconciliation pathway forward.

**PILLAR 6**

**Governance and leadership**

Focus	Commitment	Details	Target/Goal	Timeline
<b>Governance</b>	Establish an Indigenous Advisory Group (IAG)	<ul style="list-style-type: none"> <li>Establish an IAG to provide advice and Indigenous and/or Tribal insight to executive management at Enbridge</li> <li>Recruitment of IAG will include broad geographic representation and recruitment from diverse Indigenous groups</li> </ul>	<ul style="list-style-type: none"> <li>Establish IAG and Terms of Reference</li> </ul>	2023
<b>Leadership and oversight</b>	Ensure executive sponsorship and commitment to achieving IRAP goals	<ul style="list-style-type: none"> <li>Review executive support, sponsorship and accountability for IRAP specific commitments</li> <li>Additional IRAP commitments to be linked to executive sponsorship</li> </ul>	<ul style="list-style-type: none"> <li>Ensure IRAP performance is included in executive objectives</li> </ul>	2023
	Ensure IRAP implementation and support mechanisms are established and aligned across the company	<ul style="list-style-type: none"> <li>Establish and maintain governance oversight for IRAP implementation and accountability</li> </ul>	<ul style="list-style-type: none"> <li>Establish mechanisms for implementation and accountability of the IRAP</li> </ul>	2023
<b>Cultural awareness</b>	Continue to conduct Indigenous Sharing Circles with participation from Executive Leadership Team	<ul style="list-style-type: none"> <li>Maintain and expand participation in Sharing Circles</li> </ul>	<ul style="list-style-type: none"> <li>Conduct quarterly Indigenous Sharing Circles</li> </ul>	2023 – Ongoing



PILLAR 6

## Spotlight: Calgary smudge

A first-of-its-kind gathering within Enbridge provided an opportunity for personal reflection and Indigenous cultural awareness.



> A member of the Tsuu T'ina Nation west of Calgary conducts a smudge ceremony with members of our Calgary Indigenous Employee Resource Group.

In March 2022, employees were invited to gather with their colleagues, local Indigenous Elders and invited guests at our Calgary office in to participate in the first-ever indoor smudge held within our Enbridge infrastructure. The smudge experience, despite the large team gathered and being a first for most attendees, was deeply personal, reflective and spiritual.

The session was opened with a blessing and teachings by a local community Elder and led by Enbridge's Calgary chair of the Indigenous Employee Resource Group (IERG), an 18-year veteran of Enbridge and a Saulteaux member of the Cote First Nation. The smudge and teachings were a powerfully moving experience. "This event embodied the true spirit of reconciliation," said Edie Severight. "Providing an opportunity for respectful education, and exposure to important Indigenous cultural traditions in a safe and inclusive way creates crucial space for learning and connection."

This event was supported by the senior executive team and attended by management, there were extensive approvals required to facilitate permits and manage the logistics of the smudge. The ceremony created an opportunity for awareness, learning and dialogue around the rich cultural practices of Indigenous peoples.

“ Smudging is an opportunity to reflect, cleanse the air and connect to the Creator. I look forward to sharing this ritual with my colleagues through many season changes to come. ”

– Edie Severight, Law Analyst and Chair of Indigenous Employee Resource Group (IERG), Calgary chapter

## The journey ahead

Our commitment to this journey is steadfast. Our goal is to create and nurture sustainable, respectful and mutually beneficial relationships with Indigenous groups in the areas in which we operate.

Our approach to Indigenous engagement and inclusion is continuously evolving. Our journey of reconciliation is a journey of continual listening, learning, reflection and action.

This IRAP is an evolutionary milestone – we are committed to this work, to continue to challenge ourselves, our leaders, and our suppliers to walk a shared path to reconciliation and to taking an innovative and progressive approach to collaboration and inclusion.



2022 Indigenous  
Reconciliation Action Plan



## About the animals

**Puffin:** is an incredible social creature that is often used as a symbol of transformation (due to their ability to be a sea bird and a land-based bird). Not only celebrated for their plucky and joyful disposition, they are often thought to carry much wisdom and can offer much guidance.

**Wolf:** represents loyalty, strong family ties, good communication, understanding, education and seeker of higher intelligence. Of all land animals, the wolf is found all around the world and is considered to be a connector of all.

**Bear:** represents authority, good medicine, courage and strength. The bear is believed to be a healer and protector (like a mother bear protects her young). This animal is a symbol for standing up for what is right and fighting for what is good and true.

**Beaver:** is a symbol of stewardship and safety because he uses his natural gifts wisely for his survival. The beaver is also celebrated as an animal that alters their environment in an environmentally-friendly and sustainable way for the benefit of all their family.

**Bison:** sustained a way of life for Indigenous peoples for centuries. The bison was used as a food source throughout the years, its hides used in teepees and clothing, and its bones fashioned into tools. This animal symbolizes protection, prosperity, courage, strength, abundance, gratitude and most importantly, stability.

**Eagle:** is a symbol of strength, authority and power. It rules the skies with grace and great intellect. As a source of inspiration and sometimes used as a guiding force, the eagle teaches individuals about the value of the high road and the unparalleled joys of true freedom.



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ENBRIDGE GAS INC.

Answer to Interrogatory from  
CFN

Interrogatory

Reference:

- Exhibit H, Tab 1, Schedule 1, Attachment 2
- Exhibit H, Tab 1, Schedule 1, Attachment 6, p. 3
- Exhibit H, Tab 1, Schedule 1, Attachment 7, p. 26-27

Preamble:

The Ministry of Energy (the “**Ministry**”) notes that should information become available throughout the consultation process to suggest that the Project’s impacts will be significant enough to warrant a deeper level of consultation, EGI must inform the Ministry so that updated guidance can be provided.

EGI acknowledged that CFN maintains that aboriginal title to Boblo Island was never surrendered and continues to exist today and the CFN anticipates filing a specific claim in the Boblo Island and project area.

Question(s):

- a) Does EGI agree that asserting unceded title, land, water, and subsurface rights increases the level of consultation required of project proponents beyond the moderate range in accordance with Canadian constitutional requirements and related jurisprudence regarding the duty to consult? If no, please explain why not and provide the basis of EGI’s opinion that a higher level of consultation is not required.
- b) Please provide EGI’s understanding of CFN’s assertion of land, water, and subsurface rights in relation to Boblo Island and the Project area.
- c) Did EGI contact the Ministry when it became aware of CFN’s land, water, and subsurface rights assertion to Boblo Island and the surrounding area? If yes, please provide all communications between EGI and the Ministry related to EGI’s knowledge of CFN’s asserted rights. If no, please explain

why EGI did not seek further instruction from the Ministry in light of the direction from the Ministry noted above.

- d) What is EGI's position concerning the implications of CFN's assertion of land, water, and subsurface rights for the purposes of this Application and/or the Project?
- e) Please provide details of any analysis undertaken by EGI to assess and determine the impacts on the Traditional Territory and Treaty lands of CFN as part of the (i) Application, generally, and (ii) the Environmental Report. Did EGI perform any analysis prior to contacting CFN? If no analysis was performed, please explain why not.
- f) What agreements, authorizations, and or approvals with and/or from CFN does EGI envision needing or entering into to support the Project?
- g) Please indicate whether EGI has or will consider the equity participation of CFN in relation to the Project. If yes, please discuss what equity participation means to EGI and how CFN may participate. If no, please explain why not and how denying equity participation is consistent with the IPP, IRAP, and Enbridge's policies supporting reconciliation.

Response:

- a) The extent of consultation required to fulfill the Crown's duty to consult in a given situation is contextual and proportionate to a preliminary assessment of the strength of a Nation's claim/assertion and the seriousness of the potential impact of the proposed government action (e.g. an authorization of a project) on the right claimed.<sup>1</sup> While Enbridge Gas does not have detailed information regarding CFN's assertion, the Project is primarily within a municipal road allowance with the watercourse crossing being executed via Horizontal Directional Drilling (HDD) and therefore the impacts of the Project are not anticipated to be significant. Enbridge Gas has been engaging with CFN in accordance with the direction outlined in the Ministry of Energy's procedural delegation letter and will continue to engage with CFN to understand and try to address CFN's concerns.
- b) Enbridge Gas has not been provided a copy of CFN's formal assertion and so Enbridge Gas's understanding of CFN's assertion is limited to what CFN has explained to Enbridge Gas during Project consultations in their comments on the

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<sup>1</sup> *Haida v. British Columbia (Minister of Forests)*, 2004 SCC 73, paras. 43-44.



Environmental Report (ER).<sup>2</sup> Enbridge Gas understands that CFN is concerned about the protection of land, water and the subsurface and therefore Enbridge Gas has endeavored to explain the steps that Enbridge Gas is taking to mitigate impacts on such resources.

- c) Enbridge Gas became aware of CFN's land, water, and subsurface rights assertion to Boblo Island and the surrounding area via CFN's comments on the ER received on April 10, 2024.<sup>3</sup> In a subsequent reoccurring monthly meeting with the Ministry of Energy (ENERGY), Enbridge Gas advised ENERGY of CFN's concerns about the Project including CFN's anticipated filing of a specific claim for Boblo Island as described in Exhibit H, Tab 1, Schedule 1, Attachment 7, line-item 2.67 (updated December 18, 2024). ENERGY appreciated the information and advised they would be reaching out to all the Nations on the delegation list to discuss the Project
- d) While CFN has broadly outlined the nature of its assertion, Enbridge Gas is not privy to the details of CFN's assertion and has not developed a position on the strength of CFN's assertions. While the Project impacts are not expected to be significant, Enbridge Gas has nevertheless undertaken extensive consultation with CFN and has tried to address concerns, including those related to impacts on land, water and the subsurface.
- e) Enbridge Gas completed an analysis of the potential Project impacts on physical, biophysical and socio-economic environmental features, which would include features within lands that are the subject of Treaties. This analysis includes recommended mitigation and protective measures. This information can be found in Table 5.1 of the ER at Exhibit F, Tab 1, Schedule 1, Attachment 1. Enbridge Gas provided the draft ER to potentially impacted Indigenous groups, including CFN, for review and comment and has tried to address comments and concerns expressed by the Indigenous groups.
- f) Enbridge Gas is of the view that it has identified the appropriate permits, approvals or notifications for the Project in Exhibit G, Tab 1, Schedule 1 and Exhibit F, Tab 1, Schedule 1, Attachment 1, Table 1.1. Enbridge Gas currently understands that formal consent from First Nation governments is not legally required. Nevertheless, a goal of Enbridge Gas's engagement is to aim to secure consent and avoid or mitigate any potential impacts the Project may have on Indigenous rights.

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<sup>2</sup> Exhibit H, Tab 1, Schedule 1, Attachment 7, Line-item attachment 2.67 (updated December 18, 2024).

<sup>3</sup> Ibid.

- g) Enbridge Gas is meeting with and discussing the interests and priorities of Indigenous groups, including representatives of CFN, in an effort to explore opportunities to advance innovative partnerships and economic inclusion. Enbridge Gas is generally considering options for equity participation on Enbridge Gas projects within Ontario, including new infrastructure assets. It is important to recognize that the decision of whether to pursue such private commercial transactions rests with Enbridge Gas and the Indigenous groups to which opportunities may be available and offered. Also, there are regulatory and financial barriers that exist for equity sharing on OEB-regulated Enbridge Gas assets, such as financing costs, profitability, a potential need to transfer assets to a new entity, OEB approvals including a Certificate of Public Convenience and Necessity, franchise agreement, rate order, and regulatory obligations pursuant to OEB rules and Technical Standards and Safety Authority requirements.

ENBRIDGE GAS INC.

Answer to Interrogatory from  
CFN

Interrogatory

Reference:

- Environmental Report, Sections 4.2, 5, and 6
- Environmental Report, Appendix A

Preamble:

Stantec notes that the study area for the Environmental Report is considered the area within which direct interactions with the socio-economic and natural environment could occur (the “**Study Area**”).

Question(s):

- a) Does EGI recognize CFN’s jurisdiction over its Traditional Territory and over the Study Area that forms the subject of the Environmental Report? Please explain why or why not, as well as the implications in the current Application.
- b) Does EGI recognize CFN’s responsibility to care for the lands, waters, and all of creation as it relates to the Study Area? Please explain why or why not, as well as the implications in the current Application.
- c) Please provide EGI’s position as to the relevance of the area’s colonial history and the unceded status of CFN’s Traditional Territory, lands, subsurface, and water rights for the purposes of Section 5 and Section 6 of its Environmental Report

Response:

- a) Enbridge Gas recognizes that CFN is a Nation that was identified by the Ministry of Energy as a potentially impacted Indigenous group requiring consultation in relation to the Project. Enbridge Gas is committed to engaging meaningfully with CFN on an ongoing basis throughout the lifecycle of the Project, including the operational phase.

- b) Enbridge Gas understands that CFN is of the view that it has a responsibility to care for the lands, waters and all of creation as it relates to the territories that form the subject of the Environmental Report (ER). Enbridge Gas is committed to engaging meaningfully with CFN on an ongoing basis throughout the lifecycle of the Project, including the operational phase.
  
- c) Enbridge Gas values the information CFN has provided in terms of the history of the Study Area, including the written comments provided on the ER, and acknowledges that CFN is in the process of making specific assertions of rights in the area. Recognizing that CFN's interests may be potentially impacted by the Project, Enbridge Gas has taken steps to share Project information with CFN, including the assessment of potential impacts and proposed mitigation outlined in sections 5 and 6 of the ER, with a view to obtaining feedback from CFN and identifying any areas of specific concern. Please see Exhibit H, Tab 1, Schedule 1, Attachment 7, line-item attachment 2.67 (updated December 18, 2024). Enbridge Gas plans to continue to engage CFN throughout the lifecycle of the Project, including the operational phase, and would be pleased to discuss any additional concerns or suggestions CFN might have in relation to the Project.

ENBRIDGE GAS INC.

Answer to Interrogatory from  
CFN

Interrogatory

Reference:

- Environmental Report, Section 6

Preamble:

Stantec undertook a cumulative effects assessment, noting that the OEB has specified that only those effects that are additive or interact with the effects that have already been identified as resulting from the Project are to be considered under cumulative effects and that it is necessary to determine whether these effects warrant mitigation measures.

Question(s):

Please provide any details of any efforts to understand the cumulative effects of development and projects, including the Project, on CFN's traditional and contemporary uses in and around the Study Area, including, inter alia, hunting, fishing, and ceremonial activities, and how Stantec's research and consultations with CFN informed Section 6 of the Report

Response:

Stantec undertook a comprehensive cumulative effects assessment as part of the Environmental Report ("ER") for the Boblo Island Community Expansion Project in accordance with the Ontario Energy Board's *Environmental Guidelines for the Location, Construction and Operation of Hydrocarbon Pipelines and Facilities in Ontario, 7<sup>th</sup> Edition (2016)* and the OEB's *Environmental Guidelines for the Location, Construction and Operation of Hydrocarbon Projects and Facilities in Ontario, 8<sup>th</sup> Edition (2023)* (OEB's Environmental Guidelines). As described in section 6 of the ER found at Exhibit F, Tab 1, Schedule 1, Attachment 1, building upon the intent of the OEB's Environmental Guidelines, the OEB has specified that only those effects that are additive or interact with the effects that have already been identified as resulting from the Project are to be considered under cumulative effects. The cumulative effects assessment determined that, provided the mitigation and protective measures outlined in the ER are implemented and that concurrent projects implement similar mitigation

and protection measures, potential cumulative effects are not anticipated to occur, or if they do occur are not anticipated to be significant.

Enbridge Gas engaged with CFN early in the Project development, providing CFN with Project information and requesting feedback from the CFN, including with respect to potential impacts and proposed mitigation measures as outlined in Exhibit H, Tab 1, Schedule 1, Attachment 6 and Attachment 7 (updated December 18, 2024). CFN provided detailed comments on matters of concern to CFN, as outlined in Exhibit H, Tab 1, Schedule 1, Attachment 7, line-item attachment 2.67. In response, Enbridge Gas provided further information regarding the Project and provided additional explanation of its assessment as well as the planned mitigation measures, in relation to a myriad of subject areas that were the focus of CFN's comments. Details of how Enbridge Gas addressed CFN's concerns are outlined in line-item attachment 2.70 of Exhibit H, Tab 1, Schedule 1, Attachment 7 (updated December 18, 2024). Enbridge Gas will continue to engage with CFN throughout the lifecycle of the Project.

ENBRIDGE GAS INC.

Answer to Interrogatory from  
CFN

Interrogatory

Reference:

- Environmental Report, Section 3.5.7

Preamble:

Stantec notes that it welcomes the opportunity for Indigenous communities to share context and background to the findings of both the archaeological studies as well as the natural heritage studies completed for the Project (the “**Studies**”) so that it may gain a sense of the full value of the species and ecosystems (and subsequent impacts) discussed in the Environmental Report.

Stantec notes that CFN has developed a Species of Interest List.

Question(s):

- a) Will EGI ensure that CFN is able to participate in the Studies, including through providing capacity funding and employment opportunities for CFN members?
- b) Please provide details on how CFN’s traditional knowledge, context and background will be included in the Studies to ensure that CFN and its members meaningfully contribute to the Studies.
- c) Will EGI undertake a Stage 2 archaeological assessment? If yes, please provide details regarding how EGI will ensure that CFN meaningfully contributes and participates. If no, please explain why not in light of Stantec’s recommendation for, at minimum, a Stage 2 archaeological assessment for a portion of the Study Area.
- d) Please confirm whether EGI has determined that any Stage 3 and/or Stage 4 archaeological assessments have been recommended or will be required. If yes, please provide details, including how EGI will ensure that CFN meaningfully participates and contributes to the assessment(s).

- e) Will EGI incorporate measures to mitigate impacts on species identified in CFN's Species of Interest List? If no, please explain why not. If yes, please provide details on how CFN can participate to ensure that mitigation measures adopted by EGI protect species of interest and importance to CFN and its members.
- f) Please confirm whether EGI will commit to sharing with CFN, on an ongoing basis, details concerning any future discoveries of archaeological resources.

Response:

- a) Enbridge Gas has completed all pre-construction studies. At this time, no further studies are scheduled to occur. CFN was invited and participated in archaeology fieldwork studies and was provided funding for their participation.
- b) Enbridge Gas has been engaging with CFN on the Project since February 2022 and the engagement is detailed in Exhibit H, Tab 1, Schedule 1, Attachment 7 (updated December 18, 2024). During this ongoing engagement, Enbridge Gas sought to obtain traditional knowledge, context and background from CFN on the Project areas. Enbridge Gas has considered the input received from CFN to date and responded to identified concerns.
- c) The Stage 2 archaeological assessment fieldwork was completed in October 2023. The results of the Stage 2 archaeological assessment indicated that no archaeological resources were identified during the assessment of the Study area. CFN participated in the Stage 2 archaeological assessment fieldwork.
- d) No archaeological resources were identified during the Stage 2 archaeological assessment and therefore a Stage 3 and/or Stage 4 archaeological assessment was not recommended or required.
- e) Enbridge Gas has requested but has not received CFN's Species of Interest List.

Enbridge Gas wants to assure CFN that the information shared would be used solely for the purpose of environmental protection and project planning and would not negate future consultation on projects. Enbridge Gas's goal is to work together to identify and mitigate any potential impacts on these species, and to incorporate CFN's traditional knowledge into Enbridge Gas's studies. Enbridge Gas has identified mitigation measures proposed to protect wildlife and vegetation in the Project area and welcomes any further comments CFN may have in that regard.



- f) Should archaeological resources be identified, Enbridge Gas (and its contractor) are obligated to notify the Ministry of Citizenship and Multiculturalism (MCM) via a licensed archaeologist who, in turn, can advise on next steps. Those next steps may be to conduct further assessment/mitigation of the archaeological resource and if the archaeological resource is of Indigenous ancestry, the Indigenous communities would be notified and their input sought. If the identified item is determined to not be archaeological or it is of Euro-Canadian ancestry, no notification to Indigenous communities would be needed.

ENBRIDGE GAS INC.

Answer to Interrogatory from  
CFN

Interrogatory

Reference:

- Environmental Report, Section 1.2.1
- Ontario Energy Board: *Environmental Guidelines for the Location, Construction and Operation of Hydrocarbon Pipelines and Facilities in Ontario* (the “**Environmental Guidelines**”), Section 5.14 Social Impacts

Preamble:

The Environmental Report was prepared to, among others, complete a detailed review of socio-economic features along the preferred route of the Project and establish mitigation and protective measures that may be used to reduce or eliminate potential socio-economic impacts of the Project.

The Environmental Guidelines provides that Social Impact Assessment (“**SIA**”) is an integral component of environmental analysis and ensures that the extent and distribution of a project’s social impacts are considered in an explicit and systematic way.

Question(s):

- a) Please discuss whether EGI has considered the social impacts of the proposed project on CFN. If yes, please provide details and all related reports, presentations, or other documents specific to CFN. If no, please explain why not.
- b) Please discuss whether EGI has considered the cultural heritage impacts of the proposed project on CFN. If yes, please provide details and all related reports, presentations or other documents specific to CFN. If no, please explain why not.

- c) Please discuss whether EGI considered the Project's impacts on systemic social inequalities faced by CFN's members, including gender, gender diverse people, race, ethnicity, religion, age, mental or physical disability. If not, please explain why these identified types of social impacts were not considered as part of EGI's assessment of social impacts.
- d) Please discuss whether EGI has considered the safety risks of the expected construction workforce on CFN and vulnerable members of CFN, including as it relates to safety risks such as potential substance abuse, disproportionate impacts on women in communities, and impacts on the sex trade and how EGI intends to mitigate the identified safety risks.

Response:

- a) Yes, Enbridge Gas considered the social impacts of the Project on CFN. Potential impacts to Indigenous communities, including CFN, are outlined in Section 3.5.7 of the Environmental Report (ER) found at Exhibit F, Tab 1, Schedule 1, Attachment 1. In addition, Enbridge Gas consulted with CFN to understand any CFN concerns about the Project, potential impacts and proposed mitigation measures as outlined in Exhibit H, Tab 1, Schedule 1, Attachment 6 and Attachment 7 (updated December 18, 2024). Please see the responses to part c) and part d) of this Exhibit for more information regarding social impacts.
- b) Yes, Enbridge Gas considered the cultural heritage impacts of the Project on CFN. A Cultural Heritage Screening Report was completed by Stantec Consulting Ltd. for the entire Project and was provided at Appendix F of the ER. In addition, Enbridge Gas consulted with CFN to understand any CFN concerns about the Project, potential impacts and proposed mitigation measures as outlined in Exhibit H, Tab 1, Schedule 1, Attachment 6 and Attachment 7 (updated December 18, 2024).
- c) Potential impacts on socio-economic features are outlined in Section 3.5 of the ER and align with the Ontario Energy Board's *Environmental Guidelines for the Location, Construction and Operation of Hydrocarbon Projects and Facilities in Ontario, 8<sup>th</sup> Edition (2023)* (OEB's Environmental Guidelines).

There would be no anticipated residual effects on systemic social inequalities due to the Project scope, anticipated existing local tradesperson workforce, and short duration of active construction timeline of approximately three months, coupled with the requirements of Enbridge Gas's Supplier Code of Conduct. Enbridge Gas's suppliers, which include its contractors and subcontractors, are required to follow Enbridge Inc.'s policies including the Supplier Code of Conduct, which states:

"Enbridge believes that each individual with whom we come in contact deserves to be treated fairly, honestly, and with dignity. We do not condone any form of harassment, discrimination, or inappropriate actions or language of any kind."

Drug and Alcohol Programs, Respectful Workplace Training and Indigenous Peoples Awareness Training are specific to the Construction Contractor(s).

- d) The Socio-Economic Environment section within the Boblo Island Community Expansion Project ER was prepared in accordance with Section 5.14 of the OEB's Environmental Guidelines. Socio-economic features that were evaluated and recommended mitigation measures are included in Section 3.5 and Table 5.1 of the ER.

The Project (pipeline and facility construction and operations) will employ a small workforce for a short period of time. In addition, any contractor that is a part of this Project must comply with, at minimum, Enbridge Gas's policies, which include Enbridge Inc.'s Statement on Business Conduct, which addresses conduct expectations and specifically states that Enbridge Inc. will not tolerate human rights abuses. Enbridge Gas's general contractors are also required to follow Enbridge Inc.'s policies including the Supplier Code of Conduct, which states "Enbridge believes that each individual with whom we come in contact deserves to be treated fairly, honestly, and with dignity. We do not condone any form of harassment, discrimination, or inappropriate actions or language of any kind. Suppliers must conduct all their operations in a socially responsible, non-discriminatory manner and in full compliance with all applicable laws."

Enbridge Gas's projects and the cumulative effects that are assessed are governed by the OEB's Environmental Guidelines, which take into consideration the specific circumstances of each project. A key component of the impact assessment is to appropriately scope the assessment to the scale of the Project. Based on the relatively small project scale (i.e., approximately 2.9 km of small diameter pipeline) and the fact that the construction workforce will be locally sourced, a residual effect on sex trafficking is not considered likely to occur with the implementation of the above noted Enbridge Gas policies and codes of conduct. Without the identification of a likely residual effect, there is no cumulative effect pathway on sex trafficking to consider in the context of the current Project scope.

ENBRIDGE GAS INC.

Answer to Interrogatory from  
CFN

Interrogatory

Reference:

- Environmental Report, Table 5.1
- Environmental Report, Section 7.1.4

Preamble:

The Environmental Report provides a description of the potential effects on vegetation in the Study Area.

Question(s):

- a) Will EGI commit to undertaking a vegetation survey in the Study Area and undertake the mitigation and protective measures identified in Table 5.1? If yes, please provide details on how EGI will ensure that CFN meaningfully participates and contributes to the vegetation survey and implementation of mitigation and protective measures. If not, please explain why not.
- b) Please confirm whether EGI will implement tree protection zones adjacent to working areas.
- c) Please confirm whether EGI will commit to sharing tree removal plans with CFN prior to removing trees and to consult with CFN to ascertain appropriate measures for tree removals and compensation.
- d) Please confirm whether EGI will commit to consulting with CFN prior to replacing any trees removed as part of the construction of the Project and any vegetation restoration plans.
- e) Please confirm whether EGI will commit to provide CFN with updates concerning restoration planning and obligations subsequent to construction.
- f) Please confirm whether EGI commits to restoring any disturbed areas to a condition superior to their original state.

- g) Please confirm whether EGI commits to eliminate any invasive species in the Project area, including *Phragmites australis*.
- h) Will EGI commit to sharing its post-construction monitoring report with CFN prior to finalization so that CFN may review and provide any feedback?

Response:

- a) Stantec Consulting Ltd. (Stantec) conducted windshield surveys of the vegetation within the Study Area as part of the Environmental Report (ER) found at Exhibit F, Tab 1, Schedule 1, Attachment 1. Additionally, Stantec included previous knowledge of the area from their own database within their study to ensure a conservative approach was used in capturing vegetation potential in the area. Information on vegetation within the Study Area can be found in section 3.4.2.2.1 and section 7.1.4 of the ER. No further vegetation surveys are recommended to be undertaken at this time.

Enbridge Gas commits to undertaking the mitigation and protection measures identified in Table 5.1 of the ER. Enbridge Gas plans to continue to engage CFN throughout the lifecycle of the Project and would be pleased to discuss any additional concerns or suggestions CFN might have in relation to the measures outlined in the ER.

- b) Section 3.4.2.2 within Table 5.1 of the ER specifies the mitigation and protective measures specific to forest and vegetation cover, including trees. Enbridge Gas will adhere to the mitigation and protective measures listed in Table 5.1 of the ER, including the following measures specific to tree protection:
  - Avoidance of trees and their critical root zones will be implemented, wherever feasible, to limit disturbance;
  - Construction traffic will be restricted to the existing road allowance where possible to avoid potential compression damage to the root zones of trees located adjacent to the road allowance;
  - Limits of the temporary workspace will be clearly marked to reduce encroachment into adjacent wooded areas and avoid unnecessary tree removal; and
  - Horizontal directional drilling installation method to be considered when construction occurs adjacent to woodlands.
- c) No tree removal is proposed for the Project. Should this change, prior to removing trees, Enbridge Gas will share tree removal plans for the Project with CFN.

- d) No tree removal is proposed for the Project and as such, tree replacement will not be required. Should this change, Enbridge Gas will consult with the Town of Amherstburg in accordance with Public Tree By-Law 2018-106 who, in turn, can advise of next steps. Enbridge Gas will advise CFN on tree removal/replacement decisions made by the Town of Amherstburg.
- e) Confirmed.
- f) Enbridge Gas plans to restore the Project area to pre-construction conditions or better.
- g) If invasive species are discovered during construction and are within the boundaries of ground disturbance activities, the invasive species will be removed.
- h) Appendix D of the OEB's Natural Gas Facilities Handbook lists the OEB's Standard Leave to Construct Conditions of Approval.<sup>1</sup> One of such Conditions of Approval is the requirement to file with the OEB a post construction report within three months of the full project in-service date and a final monitoring report no later than fifteen months after the full project in-service date, or, where the deadline falls between December 1 and May 31, the following June 1. The OEB has not developed Standard Conditions of Approval for leave to construct exemption applications. Should the OEB impose Conditions of Approval granting leave to construct exemption for the Project which includes the requirement to file a post construction report and final monitoring report with the OEB, Enbridge Gas would welcome CFN to participate in a post construction and restoration monitoring walkthrough, and Enbridge Gas can share the subsequent reports with CFN directly upon their submission to the OEB.

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<sup>1</sup> [https://www.oeb.ca/sites/default/files/uploads/documents/regulatorycodes/2024-04/OEB\\_Natural%20Gas%20Facilities%20Handbook\\_2024.pdf](https://www.oeb.ca/sites/default/files/uploads/documents/regulatorycodes/2024-04/OEB_Natural%20Gas%20Facilities%20Handbook_2024.pdf)

ENBRIDGE GAS INC.

Answer to Interrogatory from  
CFN

Interrogatory

Reference:

- Environmental Report, Sections 3.4.2.3, 3.4.2.5, and 7.1.5
- Environmental Report, Table 5.1

Preamble:

The Environmental Report provides a description of the potential effects on wildlife and wildlife habitat, and the identification of species at risk in the Study Area.

The Environmental Report notes that unevaluated wetlands may be present in the Study Area and a vegetation survey is recommended.

Question(s):

- a) Please confirm whether EGI will commit to sharing with CFN, on an ongoing basis, details concerning significant wildlife encounters or incidents, as well as any discoveries of active wildlife habitat that reasonably raise the question of whether to suspend construction.
- b) Please confirm whether EGI will commit to advising CFN of any encounters with species at risk or species of interest to CFN in the Study Area throughout all phases of the Project?
- c) Please confirm that EGI will sweep for nests within 24-48 hours prior to the construction activities that may impact trees and nesting areas in the Study Area.
- d) Please confirm whether EGI will commit to informing CFN in the event a nest or reptilian or amphibian habitat is found during construction activities, especially nests and habitats for species of interest to CFN.
- e) Please confirm whether EGI will commit to notifying CFN before the removal of trees known to be used or potentially used by Migizi (Bald Eagle), as well



as to provide CFN with reasonable capacity funding to complete sweeps prior to tree removal.

- f) Please confirm whether EGI will commit to sharing the post-construction environmental reports with CFN prior to finalization.

Response:

- a) Significant wildlife encounters or incidents, as well as any discoveries of active wildlife habitat that reasonably raise the question of whether to suspend construction, will be shared with CFN.
- b) Species at Risk encounters will be shared with CFN, should they occur. Enbridge Gas has requested but has not received CFN's species of interest list. As such, Enbridge Gas cannot reasonably commit to determining if encounters with species of interest to CFN occur. Please see the response at Exhibit I.CFN-5, part e).
- c) No, Enbridge Gas will commit to completing nest sweeps within 7 days prior to commencing construction activities in migratory bird habitat within the restricted activity period, as recommended in section 7.1.4, Table 1.1, and Table 5.1 of the Environmental Report found at Exhibit F, Tab 1, Schedule 1, Attachment 1.
- d) Please see the response at part b) to this Exhibit. Reptilian or amphibian nests or habitat discovered during construction activities will be shared with CFN, should they occur.
- e) No tree removal is proposed for this Project. Should avoidance of tree removal and of the trees potentially used by Migizi (Bald Eagle) not be possible, Enbridge Gas will provide CFN with an opportunity to participate as a monitor during sweeps and will provide CFN with reasonable compensation for their time to complete the sweeps.
- f) Please see the response at Exhibit I.CFN-7, part h).

ENBRIDGE GAS INC.

Answer to Interrogatory from  
CFN

Interrogatory

Reference:

- Environmental Report, Table 5.1, Section 7, and Appendix H

Preamble:

The Environmental Report anticipates the employment of an “Environmental Inspector” and various inspection duties and activities.

Question(s):

- a) Please confirm whether EGI will commit to employing an environmental inspector.
- b) Please confirm whether EGI will commit to sharing the relevant job posting or job summary relating to the environmental inspector, and whether CFN will have the opportunity to provide input into the job parameters for and/or the ultimate selection of the environmental inspector.
- c) Please confirm whether EGI will commit to monitoring reports as recommended in the Environmental Report and to share all such reports with CFN prior to finalization.

Response:

- a) Confirmed.
- b) Enbridge Gas is committed to outlining the job responsibilities of the Environmental Inspector, retained from Stantec Consulting Inc., and encourages CFN to provide Enbridge Gas with input on any specific parameters CFN would like to see included in the job description. Provided the input is provided in a timely manner, to the extent Enbridge Gas agrees that such parameters are appropriate, they will be included in the job description.

c) Please see the response at Exhibit I.CFN-7, part h).

ENBRIDGE GAS INC.

Answer to Interrogatory from  
CFN

Interrogatory

Reference:

- Environmental Report, Section 2.5.1

Preamble:

EGI notes that it works to build an understanding of project related interests, ensure regulatory requirements are met, mitigate, or avoid project-related impacts on Aboriginal interests including rights, and provide mutually beneficial opportunities where possible.

Question(s):

- a) Do the stated objectives give rise to a need for EGI – or Stantec on its behalf – to do any or all of the following as part of the Indigenous consultation program:
- Make all reasonable efforts to identify any applicable CFN policy, including Band Council Resolutions;
  - Make all reasonable efforts to identify applicable laws and policy documents, including UNDRIP;
  - Consider the effect of CFN's Protocols of Engagement and Consultation and Band Council Resolutions on project decisions and the Project more generally;
  - Consider the effect of UNDRIP on project decisions and the Project more generally.

Please provide an explanation of EGI's position for each element of the above.

- b) Please reconcile EGI's (and Stantec's) consideration (or lack thereof) of UNDRIP with the stated objectives set out in Section 2.5.1 and the IPP and IRAP.

Response:

a) - b)

Enbridge Gas attempts to identify all relevant information, including policies and legal frameworks, when undertaking a project. In addition, Enbridge Gas engages with potentially affected Indigenous groups early on in the development of a project so that Indigenous groups can, through their representatives, identify any questions or concerns regarding the project, including any potential impact on Indigenous interests, and propose any mitigation measures. This process is consistent with Enbridge's respect for the unique rights of Indigenous peoples, Treaties and UNDRIP.

Enbridge Gas understands that CFN was reviewing and ratifying a water assertion and a subsurface rights assertion within its traditional territories. Enbridge Gas has assessed the potential impacts of the Project on environmental features, such as water resources, and has developed mitigation measures for the purpose of minimizing those impacts. Construction of the Project will primarily occur within the existing road allowance which will mitigate environmental effects, including subsurface disturbance. Additionally, the watercourse crossing will be constructed via trenchless construction methods (i.e., horizontal directional drilling), which will mitigate the environmental effects on the waterway.

ENBRIDGE GAS INC.

Answer to Interrogatory from  
CFN

Interrogatory

Reference:

- Environmental Report, Sections 7.2.4 and 7.2.5

Preamble:

The Environmental Report assumes that an Environmental Protection Plan (“**EPP**”) will be developed prior to construction of the Project.

Question(s):

- a) Will EGI’s EPP consider mitigation measures recommended by CFN? If yes, please provide details of how these mitigation measures will be communicated to EGI and how they will be incorporated into the EPP.
- b) Will EGI commit to sharing the EPP prior to its finalization so that CFN can review it and provide any feedback?

Response:

a) - b)

Yes, mitigation measures recommended by Indigenous communities will be considered and can be communicated to Enbridge Gas through ongoing consultation. Any additional mitigation measures identified and agreed upon will be included in the EPP by Enbridge Gas. The majority of environmental mitigation and protection measures are outlined in the Environmental Report (ER) found at Exhibit F, Tab 1, Schedule 1, Attachment 1, which has been made available to CFN as part of the consultation process. These mitigation and protection measures will be included in the final EPP. Enbridge Gas will share the EPP with CFN once it is finalized, before construction commences. It is important to note that all necessary environmental permits and approvals must be obtained prior to finalizing the EPP, which is why the document cannot be shared in its final form at this time.