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4.0 HEALTH, SAFETY AND ENVIRONMENTAL MANAGEMENT

Environmental protection is fundamental to ANEI's operations and forms an integral part of the Company's Environment, Health and Safety (EHS) Management System. ANEI is committed to the implementation of the requirements of an EHS system that is consistent with national and international EHS standards for major industrial facilities.

The following is an outline of ANEI's corporate commitment to health, safety and environmental management, for this Project. These plans will be developed and revised as necessary as the Project moves through the phases of design, construction, installation, production, and decommissioning. Inherent in this management system is the provision for continual environmental improvement, ongoing consideration of stakeholders, and adaptability of these documents to respond to environmental concerns.

Along with coordination with the local emergency responders, ANEI will prepare and keep updated a Facility Emergency Response and Contingency Plan for the LNG Terminal (refer to Section 2.6.2.3). The Plan will contain the following main elements:

- Emergency operations conducted at the LNG terminal will be the primary responsibility of ANEI.
- The Emergency Response and Contingency Plan will establish response procedures for LNG release and other emergency response requirements such as forest fires, in coordination with emergency responders.
- The terminal operator will ensure the emergency manual is up to date and distributed to the appropriate emergency responders, and the procedures tested on a frequent basis.

For shipping emergency, actions will be taken to prevent or minimize damage to the vessel, public health and welfare, and the environment. These actions may include investigating the cause of the problem, emergency notifications and damage control. The ship's emergency plans and procedures are the first, and best, line of defense. For any emergency, response priorities will be established which provide for the safety of the crew, safety of the vessel, public health and safety based on the vessel's location and potential scale of the emergency and protection of the environment. The approved Plan will detail actions for emergencies such as a cargo release, fire, collision or allision, injury of more than one crewmember, grounding, oil spill, or any mechanical failure that affects safe ship operation.

Other environmental protection plans will also be developed for the Project to minimize potential environmental impacts throughout the Project lifecycle; these include:

- Environmental Management Plan (EMP) – this is typically an “umbrella” document that summarizes a number of corporate commitments to environmental management including: environmental policy; objectives; legal requirements; programs and procedures; training; communication; record keeping; and reporting. The EMP could take the form of an environmental management system (EMS) document that is updated as necessary. The EMS may also include specific environmental protection plans (EPPs) to identify and implement specific mitigative measures in the environmental assessment and other regulatory conditions.
- Waste Management Plan – addresses waste minimization and disposal procedures.
- Spill Management Plan – addresses prevention and response with regard to small and medium size spills of potentially hazardous materials on site.
- Stormwater Management Plan – addresses management of site stormwater runoff during operation to prevent erosion and sedimentation of receiving waters and other sensitive areas and to prevent contamination of stormwater and receiving waters due to spills.
- Fishery Compensation Plan – to be negotiated with area fishers and aquaculturists to address demonstrated loss of gear and/or catch due to Project related activities or accidents.
- Archaeological Contingency Plan – outlines procedures to follow in the event that archaeological resources are unexpectedly discovered at the site.
- Traffic Management Plan – outlines procedures to control truck traffic during the construction period to minimize dust and noise on socio-economic receptors.

These plans can only be finalized once the Project design is finalized and will be developed in consultation with various regulators to ensure their concerns are addressed in the planning process. Full versions of these plans will be provided to appropriate regulators for review prior to Project start-up.

LNG vessel navigation and docking procedures in the Strait of Canso as well as other operational manuals will be developed through the TERMPOL process and other consultation with Canadian Coast Guard, Transport Canada and the pilotage authority.

TERMPOL is not a regulatory instrument, but under *CEAA* there is a requirement for review of projects with marine/navigation safety issues. Transport Canada is mandated to be part of the technical review committee for the EA to serve this purpose. Transport Canada uses TERMPOL as the tool to objectively appraise operational ship safety, route safety, management and environmental concerns

associated with the location, construction and subsequent operation of a marine terminal system for the bulk handling of LNG and other cargoes identified by Transport Canada. Such an appraisal, using the Procedures and Methodologies in the TERMPOL review process enables an inter-departmental committee to identify potential problems and recommend appropriate response measures. A security plan will be developed according to the International Ship and Port Security requirements and discussion with Transport Canada.