

Line 3 Replacement Project

PERMIT COMPLIANCE FILING

Permittee:	Enbridge Energy, Limited Partnership
Permit:	Route Permit
Docket No.:	PL-9/PPL-15-137
Permit Section:	Section 6.2 - Human Trafficking Prevention Plan
Date of Submission:	May 5, 2020

Enbridge Energy, Limited Partnership (“Enbridge”) respectfully submits this filing in compliance with the Minnesota Public Utilities Commission’s (“Commission”) requirement that Enbridge develop a Human Trafficking Prevention Plan. Specifically, the permit requires:

The Permittee shall develop and implement a Human Trafficking Prevention Plan in coordination with the Department of Commerce, the Minnesota Human Trafficking Taskforce, MIAC, and all Minnesota Tribes that wish to participate. The Department of Commerce will issue a written invitation to assist in the development of the plan to MIAC and the governments of all Tribes within the state, but the Permittee has primary responsibility for coordinating, completing, delivering, and implementing the plan, which must also document all efforts to engage the above entities. This plan shall be designed to educate, equip, and encourage the public and those associated with pipeline construction and operation to prevent and report Project-related human trafficking. The Permittee shall establish a toll-free hotline for the purpose of reporting human trafficking during construction of the project. The plan shall be filed with the Commission 60 days prior to construction and must be included as part of the employee training and education required in Section 4.7.

The Permittee shall deposit in a Public Safety Escrow Account with an independent United States financial institution an amount determined to be appropriate for agents to enhance existing human trafficking and drug enforcement agencies and social service task forces to address illegal drug and human trafficking in the area of construction. This Public Safety Escrow Account will be the same account detailed under Section 5.5 (Public Safety and Security) of this permit. The Commission’s Executive Secretary shall make the determination of the overall amount of funds and distribution of funds upon consultation with the Public Safety Liaison and the Tribal Monitor, who shall have conferred with law enforcement agencies and social service task forces of the affected LGUs and Tribal Governments.

On December 10, 2018, the Minnesota Department of Commerce, Energy Environmental Review and Analysis (DOC-EERA) staff sent a draft of the Human Trafficking and Prevention Plan to the mailing list provided in Table 1 below. Recipients were asked to provide written or verbal comments on the plan by January 10, 2019 (see Attachment 1 – DOC-EERA Letter).

Table 1 – Plan Recipients	
Entity	Name
Bois Forte Band of Chippewa Indians	Chairwoman Cathy Chavers
Bois Forte Band of Chippewa Indians	Bev Miller, THPO
Fond du Lac Band of Lake Superior Chippewa	Chairman Kevin R. Dupuis Sr.
Fond du Lac Band of Lake Superior Chippewa	Jill Hoppe, THPO
Fond du Lac Band of Lake Superior Chippewa	Seth Bichler
Davis Law Office	Sara Van Norman
Grand Portage Band of Lake Superior Chippewa	Chairman Norman Deschampe
Grand Portage Band of Lake Superior Chippewa	Mary Ann Gagnon, THPO
Leech Lake Band of Ojibwe	Chairman Faron Jackson Sr.
Leech Lake Band of Ojibwe	Amy Burnette, THPO
Legal Director for the Leech Lake Band of Ojibwe	Grace Elliott
Lower Sioux Indian Community	President Brian Pendleton
Lower Sioux Indian Community	Cheyenne St. John, THPO/Historic Site Mgr.
Mille Lacs Band of Ojibwe	Chief Executive Melanie Benjamin
Mille Lacs Band of Ojibwe	Natalie Weyaus, THPO
Minnesota Department of Health, Human Trafficking Task Force	Amy Kenzie
Lockridge Grindal Nauen P.L.L.P.	David J. Zoll
Lockridge Grindal Nauen P.L.L.P.	Rachel Kitze Collins
Prairie Island Indian Community of Minnesota	President Shelley Buck
Prairie Island Indian Community of Minnesota	Noah White, THPO
Red Lake Band of Chippewa Indians	Chairman Darrell G. Seki, Sr.
Red Lake Band of Chippewa Indians	Kade Ferris, THPO
Shakopee Mdewakonton Sioux	Chairwoman Charlie Vig
Upper Sioux Community	Chairman Kevin Jensvold
Upper Sioux Community	Samantha Odegard, THPO
White Earth Nation of Minnesota Chippewa	Chairman Terrence Tibbetts
White Earth Nation of Minnesota Chippewa	Cayla Olson, THPO and NAGPRA Rep.
	Joseph Plumer

Minnesota Indian Affairs Council	Dennis Olson Jr., Executive Director
Minnesota Indian Affairs Council	Jim Jones Jr., Cultural Resources Director

Following the initial letter from DOC-EERA, Enbridge also sent a draft of the plan to the following individuals: Claire Cambridge, Minnesota Department of Public Safety, Office of Justice; Amanda Gronhovd, State Archeologist; Heather Potteiger, Mille Lacs Band of Ojibwe; Bobby Jo Pazdernik, Minnesota Department of Public Safety; and Grace Elliot, Legal Director for the Leech Lake Band of Ojibwe.

Table 2 summarizes the comments received on the Plan and how the input informed revisions to the Plan.

Table 2 – Comment/Response Summary			
Commenter	Date	Comment	Response
Fond du Lac Band of Lake Superior Chippewa	January 10, 2019	Under Background, incorporate a definition of human trafficking to provide meaningful context; the Band included a definition from the Minnesota Human Trafficking Task Force.	Enbridge has inserted a definition into the Plan.
Fond du Lac Band of Lake Superior Chippewa	January 10, 2019	“[I]nset appropriate citations and quotes from the extensive research regarding the connections between extractive industries and human trafficking, as well as the problem of human trafficking of Native women and girls in northern Minnesota and nationwide.”	Enbridge has added Fond du Lac Band’s suggested citation to the Plan.
Fond du Lac Band of Lake Superior Chippewa	January 10, 2019	“Under Plan Development (page 2), the introduction should correctly identify Tribes United Against Sex Trafficking (acronym TRUST), which has members representing nearly all Minnesota tribes and for which Fond du Lac Tribal Police Officer Kelly Haffield is Commander. Wherever the plan references the Minnesota Human Trafficking Investigators Task Force, it should also reference TRUST. This section should also state that during the entire course of the project, the company will participate in TRUST’s quarterly meetings (to the extent possible) and remain in regular contact regarding training.”	Enbridge had previously met with TRUST regarding the Project and this Plan, and these comments have been incorporated into the Plan.

Fond du Lac Band of Lake Superior Chippewa	January 10, 2019	“The company should also commit to notify TRUST regarding any trafficking incidents involving anyone working for the company or its contractors, regardless of location, at any point during the work. This will allow for effective response during the course of the project.”	To the extent it is permitted under applicable law and Enbridge is aware of such incident, Enbridge will notify TRUST of any trafficking incident in Minnesota that involved Enbridge workers or contractors working on the Project.
Fond du Lac Band of Lake Superior Chippewa	January 10, 2019	“The schedule should also be updated to reflect current timing (including the actual plan distribution date, which was later than the plan date of October 30, 2018).”	The schedule has been updated.
Fond du Lac Band of Lake Superior Chippewa	January 10, 2019	“Under Proposed Components of the Plan, I. Zero Tolerance Policy (pages 2-3), there is currently little detail. While it is essential that human-trafficking education, policy, and enforcement requirements must be part of the contractually-required safety plan for all company employees and contractors, it is unclear what ‘zero tolerance’ means. Does it include internal investigation, firing, reporting to authorities, or other provisions? Please develop and distribute the policy for comment.”	A link to Enbridge’s Statement on Business Conduct has been added to the Plan. The Statement on Business Conduct provides additional detail and explanation concerning Enbridge’s expectations and standards.
Fond du Lac Band of Lake Superior Chippewa	January 10, 2019	“Under II. Human Trafficking Awareness Training (pages 3-4), the training approach is generally acceptable, although we’d like to explore ways to provide ongoing, in-person training for workers onboarded during construction. We support the concept of providing a hard hat sticker confirming completion of anti-trafficking training.	This comment has been incorporated into the Plan.

		Please note that the Band would also like to continue to be included in all phases of planning for the training.”	
Fond du Lac Band of Lake Superior Chippewa	January 10, 2019	“Under IV. Public Safety Escrow Account, and V. Community and Workplace Awareness Campaign, we would like to see more detail regarding specific expenditures for prevention of human trafficking. Specific efforts should include billboards, other print advertisements, and public service announcements in all communities touched by the project. Some of these efforts are already underway and may simply require additional funding. Currently, for Human Trafficking Awareness Month, a 30-second video is being shown at gas pumps in Carlton County—this approach could be expanded throughout the project area. Additionally, the company should include direct funding of the various non-profit entities that support victims of trafficking.”	Enbridge appreciates this comment and has reached out to Fond du Lac Tribal Police Officer Kelly Haffield to discuss implementation of this comment. Enbridge is exploring the options identified in this comment, as well as others, for implementing the goals identified in this Plan.
Mille Lacs Band of Ojibwe	January 10, 2019	“This process for determining the amount to be deposited into the Public Safety Escrow Account should be explained in more detail. At a minimum, it should include soliciting cost estimates from all relevant law enforcement agencies, including tribes, counties, and cities.”	The language in the Plan is consistent with the requirements in the Route Permit; the amount to be deposited into the Public Safety Escrow Account is being determined by the State of Minnesota.

Minnesota Bureau of Criminal Apprehension (“BCA”), Human Trafficking Investigators Task Force	February 14, 2019 (via telephone)	Add a reference in the Plan indicating that BCA would like to participate in the development of the training program.	This comment has been incorporated into the Plan.
BCA, Human Trafficking Investigators Task Force	February 14, 2019 (via telephone)	In addition to training of workers, add training aspect for local authorities to the Plan.	Enbridge appreciates this comment but is not typically involved in training local law enforcement in areas other than pipeline safety and, as such, does not propose changes to the Plan in response to this comment. However, Enbridge is exploring how this comment could be incorporated into the role of the Public Safety Liaison and/or the Public and Worksite Awareness Campaign referenced in the Plan.

On May 24, 2019, a summary of all comments and responses and a revised version of the Plan were sent to all entities who originally received a copy of the Plan. On May 29, 2019, Enbridge sent a summary of the comment and responses and the revised plan to Amanda Gronhovd, State Archeologist; Bobby Jo Pazdernik, Minnesota Department of Public Safety, and Sarah Beimers, Minnesota State Historic Preservation Office.

Enbridge received input from and presented Plan updates to the Tribes United Against Sex Trafficking during meetings held in April, September, and December 2019.

Enbridge worked with the following group of individuals to develop the training and this group is now working on the public awareness campaign identified in the Plan:

- Bobbi Jo Pazdnerik, Sr. Special Agent, Predatory Crimes Section, Commander of the MN Human Trafficking Investigators Task Force with the Bureau of Criminal Apprehension;
- Jill Oliveira, Communications, Bureau of Criminal Apprehension;
- Kelly Haffield, Investigator, FDL PD and lead of the Tribes United Against Sex Trafficking Task Force;
- Beth Holger, Executive Director, The Link (non-profit in Minneapolis brought in by BCA);
- Rob Pero, Perodigm PA (Tribal-owned public relations firm that produced the video).

This group has met approximately seven times and continues to exchange numerous communications to develop the training and awareness campaign and materials.

December 10, 2018

«P_Name»
«P_Company»
«Address», «Address_Line_2»
«City», «State» «Zip»

RE: Invitation to participate in Enbridge's development of plans required by the Line 3 Project route permit (PUC Docket No. PL-9/PPL-15-137)

Dear «P_Short_Name»,

This letter is being sent pursuant to the Minnesota Public Utilities Commission's (Commission) Route Permit Order in Docket PPL-15-137 issued on October 26, 2018. The Route Permit Order directed the Minnesota Department of Commerce to invite comments from the Minnesota Indian Affairs Council, Tribal Nations in Minnesota, and relevant task forces to Enbridge. The purpose of the comments is to provide Enbridge feedback in its development of certain plans intended to help guide the pre-construction, construction, and/or post-construction phases of Enbridge's Line 3 Pipeline project.

As part of the Commission's Order, Enbridge must develop an Archaeological and Historic Resources Plan, a Traditional Cultural Resources Training Plan, an Unanticipated Discoveries Plan, a Human Trafficking Prevention Plan, and an Environmental Justice Mitigation Plan. Enbridge has primary responsibility for coordinating, completing, delivering, and implementing the plans, which must document all efforts to engage the above entities. The basic framework and purpose of each of these planning documents are described below.

Your participation in developing these plans is important, and you are encouraged to contact Enbridge as soon as possible to indicate your interest in participating. You will find attached preliminary drafts that Enbridge is offering as a starting point for your review and input. Enbridge has indicated that they would appreciate your feedback on these preliminary drafts by **January 10, 2019**.

Required Plans

- **Archaeological and Historic Resources Plan:** The purpose of this plan is to provide an organized and transparent record of known archaeological and historic resources of concern along the approved route, including traditional cultural properties and traditional cultural landscapes, and to describe the avoidance and mitigation measures that Enbridge will implement to protect these resources. The plan must include specific mitigation and avoidance procedures resulting from (1) the federal Section 106 process, (2) the Minnesota Historic Sites Act/Minnesota Field Archaeology Act review, and (3) any additional surveys, mitigation, or avoidance procedures developed in coordination with the SHPO, the OSA, the MIAC, and the consulting tribes participating

in the Section 106 process. You will find the exact permit condition language in Section 4.3.6 of the Line 3 Route Permit (attached).

- **Traditional Cultural Resources Training Plan:** The purpose of this plan is to ensure that before construction starts, workers are trained about the importance of traditional cultural resources, and are aware of the procedures for avoiding and mitigating impacts to these resources. Enbridge has included this plan as Appendix J of the enclosed initial draft Archaeological and Historic Resources Plan. You will find the exact permit condition language in Section 6.1 of the Line 3 Route Permit (attached).
- **Unanticipated Discoveries Plan:** The purpose of this plan is to provide clear, consistent procedures to minimize impacts if any unrecorded archeological or historic properties, or human remains are encountered during construction, or if unanticipated effects to previously identified archaeological or historic properties occur during construction. You will find the exact permit condition language in Section 4.3.6 of the Line 3 Route Permit (attached).
- **Human Trafficking Prevention Plan:** The purpose of this plan is to provide a clear, structured set of measures to educate, equip, and encourage both the public and those associated with pipeline construction and operation to prevent and report Project-related human trafficking. You will find the exact permit condition language in Section 6.2 of the Line 3 Route Permit (attached).
- **Environmental Justice Communities Mitigation Plan:** The purpose of this plan is to detail the measures that will be implemented to mitigate the project’s disproportionate adverse impacts on Environmental Justice Communities. The environmental justice analysis in the environmental impact statement found disproportionate adverse impacts to low income minority populations residing or using lands in the vicinity of the Project, in particular American Indian populations. Within the US Environmental Protection Agency’s environmental justice framework, a finding of disproportionate adverse requires detailed efforts to avoid, mitigate, minimize rectify, reduce, or eliminate the impact associated with the project. The US Council on Environmental Quality recommends evaluating mitigation options by soliciting the views of the affected populations on measures to mitigate a disproportionately high and adverse effect, and carefully considering community views in developing and implementing mitigation strategies. Therefore, this condition of the route permit requires that Enbridge engage with disproportionately adversely impacted communities to tailor mitigation to their unique needs. You will find the exact permit condition language in Section 6.3 of the Line 3 Route Permit (attached).

How to Participate

Your participation is important. Please contact Janelle Hnatko at Enbridge by January 10, 2019 with your comments on the draft plans or to indicate your interest in participating further in the development of the plans.

- Phone office: 218-522-4848 or cell: 715-817-6103
- Email janelle.hnatko@enbridge.com or
- U.S. mail Attn: Janelle Hnatko
26 East Superior Street, Suite 309
Duluth, MN 55802

Process

- Comments can be submitted to Enbridge by email, phone, United States Postal Service, or in person. Comments or indication of interest to participate are **due by January 10, 2019**.
- Pursuant to the Route Permit, Enbridge will review and summarize comments received for each plan in response to this invitation and indicate if and how the comments were incorporated into revised drafts of the plans.
- The revised plans and a summary of the comments will be e-filed by Enbridge into PUC Docket No. PL-9/PPL-15-137.
- The Commission will follow the process set forth in Route Permit Attachment 2, Section E (attached), to approve the compliance filings. As indicated in Attachment 2, Section E, where the terms of the permit require that a compliance filing be approved by the Commission, the following process and timeline may be used as appropriate:
 - The Executive Secretary may designate a comment period to ensure the document complies with the Commission’s Order and the requirements of other agencies, as appropriate. In that case, the Permittee will be provided a period to respond to comments received during the initial comment period.
 - Upon close of the comment period the Executive Secretary will decide whether the compliance document requires a decision by the Commission.

Thank you in advance for your participation. Please do not hesitate to get in contact with me if you have questions about this process.

Sincerely,

Louise Miltich

Minnesota Department of Commerce
Energy Environmental Review and Analysis
85 7th Place East, Ste. 280
St. Paul, MN 55105
louise.miltich@state.mn.us
651 539-1853

Enclosures: Line 3 Route Permit, Enbridge’s draft Archaeological and Historic Resources Plan, Enbridge’s draft Unanticipated Discoveries Plan, Enbridge’s draft Human Trafficking Prevention Plan, and Enbridge’s draft Environmental Justice Communities Mitigation Plan.

Line 3 Replacement Project (L3RP)
Human Trafficking Prevention Plan

BACKGROUND: It is anticipated that the L3RP will have more than 4,000 construction workers building the new pipeline over the approximately 300 mile approved route in Minnesota. At least 50% of the construction workers will come from local union halls and the remaining workers will come with the construction contractors. As a condition of the L3RP Route Permit as approved by the Minnesota Public Utilities Commission, Enbridge has committed to develop a Human Trafficking Prevention Plan as defined in the draft condition language below:

8. Enbridge shall develop a Human Trafficking Prevention Plan.

A. Enbridge shall design the plan to educate, equip, and encourage the public and those associated with pipeline construction and operation to prevent and report Project-related human trafficking. Enbridge shall establish a toll-free hotline for reporting human trafficking during the Project's construction. Enbridge shall incorporate the plan into the employee training and education required by Section 4.7 of the Pipeline Routing Permit.

B. Enbridge shall develop the plan in coordination with the EERA, the Minnesota Human Trafficking Taskforce, and the Minnesota Indian Affairs Council, and all Minnesota Tribes that wish to participate. EERA will issue a written invitation to assist in the development of the plan to the Minnesota Human Trafficking Taskforce, MIAC, and the governments of all Tribes within the state MIAC and the governments of all Tribes within the state. Enbridge shall retain all other responsibilities for coordinating, completing, and implementing the plan, and shall document all efforts to engage the above entities. Enbridge shall file the plan with the Commission 60 days before beginning construction.¹

In addition:

9. Enbridge shall create and fund a Public Safety Escrow Trust Account to help defray the costs of the added burdens to law enforcement and social service agencies along the pipeline route arising from the Project.

C. Before beginning construction, Enbridge shall establish the Public Safety Escrow Trust Account in an independent US financial institution, designate the financial institution as trustee, and make deposits as specified. The financial institution shall manage the trust according to the terms of the Pipeline Routing Permit.

D. The Executive Secretary shall establish a plan for distributing funds before construction begins to enhance existing law enforcement and social service agencies along the route in combatting drug and human trafficking during the Project's construction. The Public Safety Liaison shall coordinate these drug and human trafficking grants after consulting with local and tribal governments near the route, the Minnesota Human Trafficking Taskforce, and MIAC.²

¹ Route Permit Order (October 26, 2018) ("RP Order"), at 45.

² RP Order at 46.

PLAN DEVELOPMENT

Enbridge has worked with Minnesota Tribes, Minnesota Indian Affairs Council, the Tribes United Against Sex Trafficking Task Force and Minnesota Human Trafficking Investigators Task Force on the development of this Human Trafficking Prevention Plan. The timing for plan development is included on the following table:

Action	Timeframe / Status
Establish contact and coordinate awareness program and training plan with Tribes United Against Sex Trafficking	July 2018
Establish contact and coordinate awareness program and training plan with MN Human Trafficking Investigators Task Force (MHTITF)	Oct 2018
Draft Human Trafficking Prevention Plan shared with DOC-EERA and other Stakeholders	Dec 2018
Initiate conversations with tribal entities and other organizations to identify opportunities to support educational programs about human trafficking	Dec 2018
HTPP Working Group Initial Meeting	May 2019
HTPP Working Group meetings	July 19 & 26, 2019
HTPP Working Group meeting RE: Training Video	October 2019
Training materials developed	Q2-Q4 2019
Re-initiate engagement with MN Department of Public Health representing the MN Human Trafficking Task Force	Q1 2020
HTPP Working Group Meeting RE: Public Awareness Campaign	Q1 2020
Public Awareness Campaign developed	Q1-Q2 2020
Implement approved Human Trafficking Prevention Program (align with start of construction)	2020/2021

PROPOSED COMPONENTS OF THE PLAN

I. Zero Tolerance Policy

At Enbridge, we are guided by a strong set of values: Integrity, Safety and Respect. We hold ourselves and others to these values. All employees and contractors are held to high standards and must act in accordance with the policies outlined in our Statement on Business Conduct³ and within the law. Enbridge’s Statement on Business Conduct states that we will respect human rights and conduct our business in a socially responsible manner by never tolerating human rights abuses or being complicit in any activities cause or contribute to abuse.

³ Available at:
http://www.enbridge.com/~media/Enb/Documents/Governance/CG_Statement_on_Business_Conduct_EN.pdf?la=en
 (last accessed Feb. 19, 2019).

Enbridge will communicate a zero tolerance approach to our contractors by incorporating it into contract language and with all Line 3 Replacement Project workers through onboarding training.

II. Human Trafficking Awareness Training

Enbridge is committed to empowering our employees, contractors, suppliers, and communities to report and act on human trafficking through raising awareness and supporting local education programming on human trafficking in Minnesota.

Accordingly, Enbridge has partnered with Truckers against Trafficking (TAT) and local experts to host educational presentations to Enbridge employees, contractors and suppliers regarding human trafficking and the effects/impacts of human trafficking here in Minnesota. The two events occurred on September 26 and 27, 2018, in the Twin Ports and Bemidji, respectively, and had over 200 participants including Enbridge employees and representatives from 10 local businesses that work with Enbridge. Additionally, the TAT Freedom Drivers Project mobile education was parked at each venue the full day and open to the public. As a part of Enbridge’s safety culture, internal meetings are to be started by conducting a Safety and/or Values Moment. In 2019, Enbridge followed up on the TAT training initiative by developing an internal Safety/Values Moment presentation which was rolled out via email and internal quarterly safety meetings. The presentation continues to be available for employees use in our internal Safety Moment Exchange.

For the Line 3 Replacement Project specifically, Enbridge has developed human trafficking awareness training for incorporation into the training and onboarding requirements for all Line 3 Replacement Project workers. This training program was developed by a leading human trafficking expert in Minnesota and in coordination with the Tribes United Against Sex Trafficking Task Force, the Minnesota Bureau of Criminal Apprehension’s Human Trafficking Investigators Task Force, the Fond du Lac Band of Lake Superior Chippewa and other interested parties.

This training program will include two levels of Human Trafficking Awareness Training Program for L3RP contractors and construction workers covering both in-person trainings during large construction worker mobilization periods and recordable/duplicative training materials for use onboarding construction workers throughout the project, in-between large crew mobilization times. Topics covered in the training should include, but are not limited to:

- What is Human Trafficking?⁴

⁴ The Minnesota Human Trafficking Task Force states that, “[h]uman trafficking, often referred to as modern day slavery, is the sale of adults and children into commercial sexual servitude and forced or bonded labor.” See <http://www.mnhttf.com/site/human-trafficking/what-is-human-trafficking/>. Minnesota law defines sex trafficking as the “receiving, recruiting, enticing, harboring, providing, or obtaining by any means an individual to aid in the prostitution of an individual; or by receiving profit of anything of value, knowing or having reason to know it is derived from [the sex trafficking of an individual].” [Minn. Stat. § 609.321, subd. 7a](#). Minnesota law defines labor trafficking as “the recruitment, transportation, transfer, harboring, enticement, provision, obtaining, or receipt of a person by any means, for the purpose of: debt bondage or forced labor or services, slavery or practices similar to slavery; or the removal of organs through the use of coercion or intimidation; or receiving profit or anything of value, knowing or having reason to know it is derived from [labor trafficking].” [Minn. Stat. § 609.281 subd. 5](#)

- Statistics on Human Trafficking⁵
- Who is at risk?
- What to look for/how to recognize human trafficking
- What to do/how to report suspected human trafficking

This training will be incorporated into the required safety training program that every worker on the project will get. Training is documented through large meeting sign-in sheets and/or individual training acknowledgement forms that are maintained by Safety. Additionally, once the safety training is complete, a hard hat sticker is provided and required for all workers at work sites providing a visible confirmation of participation in the training.

III. Toll-Free Hotline for Reporting Human Trafficking

Enbridge will use the toll-free National Trafficking Hotline (1-888-373-7888) and/or Minnesota Human Trafficking Investigators Task Force Hotline (651-793-7000) for reporting suspected human trafficking activities versus setting up a new line. Use of the existing National hotline number is promoted by both the Minnesota Human Trafficking Task Force and by Minnesota's Attorney General. Use of the Minnesota Human Trafficking Investigators Task Force Hotline is promoted by the Minnesota Human Trafficking Investigators Task Force. Use of either Human Trafficking Hotline would allow for the most efficient and effective reporting of these types of activities as both are operated 24/7, confidential and have trained staff ready to respond.

IV. Public Safety Escrow Account

Enbridge will place funds into a Public Safety Escrow Account in an independent US financial institution in an amount determined to be appropriate to enhance existing human trafficking and drug enforcement, law enforcement and social services task forces to be distributed prior to construction along the route to address the anticipated impacts of a large influx of workers.

Enbridge will cooperate with law enforcement as appropriate to support law enforcement activities during construction to prevent and dissuade persons from participating in trafficking.

V. Community and Workplace Awareness Campaign

Enbridge is working with the Tribes United Against Sex Trafficking Task Force, Minnesota Human Trafficking Investigators Task Force and other interested parties to develop a community and workplace awareness campaign plan. The campaign plan developed by those parties will be implemented by a native owned public affairs firm funded by Enbridge. All content developed to support this campaign will be made available to the task forces, non-profits and other interested parties for their own use beyond Line 3 construction.

⁵ See National Congress of American Indians Policy Research Center (2016), "Tribal Insights Brief: Human and Sex Trafficking: Trends and Responses across Indian Country," available at <http://www.ncai.org/policy-research-center/research-data/prc-publications/TraffickingBrief.pdf>. This report explains, among other things, that Native communities are disproportionately impacted by trafficking.