



**Table 1: Key Issues to inform the impact assessment process**

This table should outline key issues to inform the impact assessment process, including whether an impact assessment is required and, if so, the scope of the assessment and tailoring of the Tailored Impact Statement Guidelines.

Key issues are the major concerns directly related to a project component or activity, the analysis of which is anticipated to be material to decision-making under the *Impact Assessment Act*.

Federal authorities' advice should be guided by the identification and resolution of key issues. If an impact assessment is required, it will be focused on key issues.

Comment ID	a) Key issue	b) Project component or activity	c)(i) Biophysical effect pathway(s)	c)(ii) Concern unique to the project or a priority within your mandate	c)(iii) Material to federal decision-making	d) Means for issue resolution	e) Additional information from the proponent
<p><i>Identify comments by organization and comment number.</i></p> <p>e.g.: IAAC-01</p>	<p><i>Specify the key issue (e.g., specific species and location).</i></p>	<p><i>Identify the project component or activity linked to the key issue.</i></p> <p><i>Be specific about the nature, scale, novelty and complexity or the component or activity.</i></p>	<p><i>Identify the specific biophysical effect pathway between the project component or activity and the affected environmental or human receptor (including Indigenous Peoples).</i></p>	<p><i>Describe why it's a key issue within the mandate of your department or agency, including in terms of priorities of the federal government and in terms of anticipated likelihood, severity or uncertainty of effects.</i></p> <p><i>Identify if the key issue is common for projects of this nature or in this sector, or whether it's unique to this project due to its complexity, size or novelty; a sensitive or rare receiving environment; and/or proximity of sensitive environmental or human receptors (including Indigenous Peoples).</i></p>	<p><i>Describe why the key issue is material to decision-making as either:</i></p> <ul style="list-style-type: none"> <li>• <i>an adverse effect within federal jurisdiction, or a direct or incidental adverse effect, that may be significant based on available evidence including:</i> <ul style="list-style-type: none"> <li>○ <i>federal experts' knowledge and experience with past project assessments;</i></li> <li>○ <i>presence of sensitive species, habitats or human receptors (including Indigenous Peoples);</i></li> <li>○ <i>novel or complex project activities, components or technologies;</i></li> <li>○ <i>high uncertainties in effects or in the effectiveness of mitigation measures;</i></li> <li>○ <i>unknown or unproven mitigation; or</i></li> </ul> </li> <li>• <i>a factor for the justification in the public interest anticipated to be material to decision-making such as a likely positive effect contributing to sustainability, to Canada's environmental obligations or climate change commitments or in supporting governmental priorities, such as reconciliation with Indigenous Peoples.</i></li> </ul>	<p><i>Describe how the key issue could be resolved or addressed by:</i></p> <ul style="list-style-type: none"> <li>• <i>Any means, including powers, duties, functions, frameworks, policies or guidance that your department or agency has;</i></li> <li>• <i>Any means, including powers, duties, functions, frameworks, policies or guidance from another jurisdiction, including the province;</i></li> <li>• <i>Common, proven, well-understood or standard mitigation measures to mitigate the effect or effect pathway(s); or</i></li> <li>• <i>Commitments made by the proponent (e.g., in the Initial Project Description).</i></li> </ul>	<p><i>Describe information the proponent can provide, or commitments the proponent can make, in their Response to the Summary of Issues that would provide confidence that the issue can be resolved by existing means.</i></p> <p><i>Consider whether information, studies, analyses or collaborative work with other authorities would be required to address the issue beyond existing means.</i></p>
<p>HC-01</p>	<p>Potential effects on aquatic resources that contribute to Indigenous cultural heritage resulting from water withdrawal from the Peace River and any associated discharge.</p>	<p>Water withdrawals from the Peace River under an existing <i>Water Act</i> licence issued by the Province of Alberta, including associated infrastructure and any potential operational discharges.</p>	<p>Water withdrawal and any associated discharges may result in changes to water availability or quality. These changes have the potential to impact Indigenous health and/or cultural heritage through ingestion of, or recreation within, these waters.</p>	<p>Under the <i>Impact Assessment Act</i> (IAA), Health Canada (HC) provides specialist or expert information and knowledge to support the assessment of impacts on the health of Indigenous peoples.</p> <p>The Project proposes to withdraw an initial daily usage of 5,000 m<sup>3</sup> of water from the Peace River. The <i>Alberta Water Act</i> licence required to source the required</p>	<p>As per <i>Impact Assessment Act</i> Sections 2(e) and 2(f), non-negligible adverse effects on the health of Indigenous peoples related to the Project falls within federal jurisdiction.</p> <p>The nearest community and reserve is the Woodland Cree No. 226, located 11.1 km northeast of the Project.</p> <p>The iPD notes that the landscape supports Indigenous traditional use activities including fishing and harvesting. The Peace River is a major waterbody near Project infrastructure. The withdrawal of water from the river may result in impacts to Indigenous use of the Peace River for various cultural uses. The iPD does not discuss downstream Indigenous health impacts from Project related water use.</p>	<p>The iPD indicates that the Project will comply to the <i>Alberta Water Act</i> and applicable licence conditions in guiding water withdrawal activities from the Peace River.</p> <p>The implementation of a closed loop cooling system, which the iPD notes is under discussion, may alleviate water withdrawal requirements, and reduce the potential for discharges to the Peace River.</p> <p>Future management plans could include notification to Indigenous water users of potential changes in water quality/quantity during Project activities, and any necessary mitigations that will</p>	<p>HC suggests identifying downstream Indigenous users of the Peace River and describing any potential downstream cultural uses. The Proponent may consider providing water use descriptions, potential exposure pathways to indigenous users, and any planned mitigation measures.</p> <p>HC supports the implementation of a</p>

				<p>water is in progress and would allow sourcing up to 11,000m<sup>3</sup> per day. A closed loop cooling system is mentioned in the iPD which may reduce the required water withdrawal amount.</p> <p>The Peace River is a culturally important waterbody for nearby communities and may support Indigenous traditional activities such as fishing and harvesting. Changes in water quantity or quality associated with Project water use could result in exposure pathways for Indigenous peoples.</p> <p>Based on currently available information, HC does not have knowledge of the receiving environment being sensitive or rare.</p>		<p>be employed, to mitigate any potential risks to Indigenous health.</p>	<p>closed loop cooling system to alleviate impacts to Indigenous peoples as a result of potential changes to water in the Peace River.</p>
HC-02	<p>Exposure of Indigenous peoples to contaminants of potential concern (CoPCs) if air quality guidelines are used as pollute up-to-levels of emissions, particularly for non-threshold contaminants, (i.e., contaminants for which health effects can be observed at any level of exposure.)</p>	<p>The Project will result in air pollutant emissions from combustion of natural gas or diesel during construction and operations.</p> <p>The iPD indicates in Table 9 that emission sources include:</p> <ul style="list-style-type: none"> <li>Emissions from equipment and vehicles during construction</li> <li>Dust generation through vehicle and equipment movement</li> </ul>	<p>Air emissions from the Project have the potential to impact the health of Indigenous receptors via inhalation of CoPCs.</p>	<p>Air emissions are expected for the Project which might lead to impacts on Indigenous health, an area of federal jurisdiction. For non-threshold air pollutants (e.g., fine particulate matter [PM<sub>2.5</sub>] and nitrogen dioxide [NO<sub>2</sub>]), air quality criteria and guidelines should not be used as 'pollute-up-to levels', since any increase in exposure will result in an incremental population risk.</p>	<p>The iPD indicates that an updated air quality assessment will be conducted, and that the <i>Alberta Ambient Air Quality Objectives and Guidelines</i> (AAAQOG) are expected to be achieved during the operational phase of the project.</p>	<p>HC supports the use of the Canadian Ambient Air Quality Standards (CAAQS) as the most stringent criteria for air quality, however, it should be noted that some CAAQs values are not entirely "health-protective". When pollutant levels approach or exceed applicable Canadian or provincial standards, the Proponent is encouraged to compare against solely health-based guidelines. Therefore, for a quantitative risk assessment, HC recommends using the World Health Organization (WHO) global air quality guidelines<sup>3</sup> for fine particulate matter (PM<sub>2.5</sub>) and nitrogen dioxide (NO<sub>2</sub>) (24-hour and annual averaging periods). These guidelines have been set at the lowest exposure level to an air pollutant above which the</p>	<p>HC recommends implementing all economically and technologically feasible mitigation measures to limit emissions of non-threshold air contaminants to the extent possible.</p>

<sup>3</sup> World Health Organization. (2021). WHO global air quality guidelines: particulate matter (PM2.5 and PM10), ozone, nitrogen dioxide, sulphur dioxide and carbon monoxide. World Health Organization. <https://iris.who.int/handle/10665/345329>.

		<ul style="list-style-type: none"> <li>Emissions from hydrocarbon fuelled equipment during operations</li> </ul>				<p>WHO is confident that there is an increase in adverse health effects.</p> <p>This includes consideration of keeping clean areas clean and continuous improvement. Any mitigative efforts undertaken as a result of the planned air quality assessment should be undertaken in keeping with these principles. Consequently, the applicable air quality standards, such as the CAAQS, should not be considered as "pollute up-to" levels and the Proponent is encouraged to strive for continuous improvement.</p>	

Please insert additional rows as necessary.