

ANNEX 1: Advice to the Agency

Table 1: Please use the table below to provide advice for the Agency’s consideration in its recommendation to the Minister of Environment and Climate Change and preparation of draft conditions

Questions	Responses/Comments
<ul style="list-style-type: none"> • Has the proponent described all project components and activities in sufficient detail to understand all relevant project-environment interactions? If not, identify what additional information is needed. 	
<ul style="list-style-type: none"> • Were the study areas sufficient to predict potential effects from all relevant project-environment interactions, and to consider the effects within a local and regional context? • Is the baseline information sufficient to characterize the existing environment, predict potential effects and obtain monitoring objectives? If not, identify what additional information is needed. 	
Alternatives Assessment	
<ul style="list-style-type: none"> • Has the proponent adequately described the criteria it used to determine the technically and economically feasible alternative means? • Has the proponent listed the potential effects to valued components (VCs) within your mandate that could be affected by the technically and economically feasible alternative means? • Has the proponent adequately described why it chose each preferred alternative means? • Are there other alternative means that could have been presented? If so, please describe. 	
Environmental Effects Assessment	
<ul style="list-style-type: none"> • Has the proponent clearly described all relevant pathways of effects to be taken into account under section 5 of CEAA 2012? • Has the proponent identified all potential effects to VCs, including species at risk, within your mandate? • Were all potential receptors considered? 	<p>The proponent needs to provide additional detail on the following:</p> <ul style="list-style-type: none"> (i) (baseline)health and socio-economic conditions of Indigenous communities, and (iii) the current use of lands and resources for traditional purposes.

Questions	Responses/Comments
<ul style="list-style-type: none"> • Were the methodologies used by the proponent appropriate to collect baseline data and predict effects, why or why not? • Has the proponent explicitly addressed the degree of scientific uncertainty related to the data and methods used within the assessment? If there are unaccounted for scientific uncertainties, describe them and indicate the options for increasing certainty in the predictions? 	
<ul style="list-style-type: none"> • Are the predicted effects described in objective and reasonable terms (e.g. beneficial or adverse, temporary or permanent, reversible or irreversible)? 	<p>Even though predicted effects are indicated to be temporary, they may have lasting impacts on Indigenous communities. Additional information is required on immediate impacts to Indigenous communities over an extended period of time (i.e. project interactions with species traditionally harvested for food, social and ceremonial purposes). The Proponent must engage with Indigenous groups to determine their understanding and perception on how they will be impacted, and how these means and pathways of impact can be properly addressed.</p>
<ul style="list-style-type: none"> • Has the proponent adequately assessed the potential cumulative environmental effects, including using appropriate temporal and spatial boundaries, examining physical activities that have been and will be carried out, and proposing mitigation and follow-up program requirements? Provide rationale. 	
<ul style="list-style-type: none"> • Has the proponent adequately described the potential for environmental effects caused by accidents and malfunctions, including the types of accidents and malfunctions, their likelihood and severity and the associated potential environmental effects? If not, identify what additional information is needed. 	<p>The potential for environmental effects was described, but further states that the effects are unlikely to happen. The Proponent should provide additional information on the potential risks, and include the impacts should the incidents occur, particularly as Indigenous groups</p>

Questions	Responses/Comments
	have expressed concern in this regard.
<ul style="list-style-type: none"> • Are you satisfied with the proponent’s assessment of effects of the environment on the Project? • Has the proponent characterized the likelihood and severity appropriately? Provide rationale. 	
<ul style="list-style-type: none"> • Has the proponent sufficiently described and characterized the project activities and components as they relate to federal decisions within your mandate? If not, identify what additional information is needed. • Are changes to the environment, as they relate to federal decisions within your mandate, sufficiently described? If not, identify what additional information is needed. 	
Mitigation	
<ul style="list-style-type: none"> • Has the degree of uncertainty regarding the effectiveness of the proposed mitigation measures been described? If not, identify what information is needed. • Is it clear how each proposed mitigation measure links to each potential pathway of effect? 	
<ul style="list-style-type: none"> • Would you propose different or additional mitigation measures? If so, provide a description of the mitigation measure(s), with rationale. 	
<ul style="list-style-type: none"> • Which of the proposed mitigation measures and/or project design elements do you consider to be necessary to reduce the likelihood of significant adverse environmental effects? Provide rationale. 	
Residual Adverse Environmental Effects	
<ul style="list-style-type: none"> • Are the identification and documentation of residual environmental effects described by the proponent adequate? If not, what are the aspects for which there is uncertainty and, where possible, indicate how these residual effects can be best described. If there is uncertainty, what are the options for increasing certainty? 	
<ul style="list-style-type: none"> • Did the proponent provide a sufficiently precise, ideally quantitative, description of the residual environmental effects related to your mandate? Identify any areas that are insufficient. 	
Determination of Significance	
<ul style="list-style-type: none"> • Are the conclusions on significance in the EIS supported by the analysis that is provided? 	

Questions	Responses/Comments
<ul style="list-style-type: none"> Are the proponent's proposed criteria for assessing significance appropriate? This includes how the criteria were characterized, ranked, and weighted. Provide rationale. Where the proponent has not used one of the Agency's recommended key criteria (magnitude, geographic extent, duration, frequency, reversibility, and social/ecological context), has a rationale been provided? 	
<ul style="list-style-type: none"> Were appropriate methodologies used in developing the conclusions on significance? 	
<ul style="list-style-type: none"> Do you agree with the proponent's analysis and conclusions on significance? Provide rationale. 	
Monitoring and Follow-up	
<ul style="list-style-type: none"> Does the proposed monitoring and follow-up program verify the predictions of the environmental assessment as they relate to section 5? Please explain additional monitoring or follow-up needed to address uncertainty in the effects assessment. 	
<ul style="list-style-type: none"> Does the proposed monitoring and follow-up program verify the effectiveness of proposed mitigations as they relate to section 5? Please explain additional monitoring or follow-up needed to address uncertainty in the proposed mitigation. 	
<ul style="list-style-type: none"> Is the objective of the follow-up program clear and measurable? Does the follow-up program include sufficient detail, and technical merit, for the Agency to achieve the stated objective through a condition (e.g. sufficient baseline dataset, monitoring plans, acceptable thresholds of change, contingency procedures)? 	
<ul style="list-style-type: none"> Are you aware of any federal or provincial authorizations or regulations that will achieve the same follow-up program objective(s)? If so, how do these achieve the objective(s)? 	
Additional comments, views, advice	
<ul style="list-style-type: none"> Provide any other comments. 	

ANNEX 2: Information requirements directed to the proponent

Table 2: Please use the table below to provide your department’s comments and suggestions for information that should be required from the proponent to ensure the information in the EIS is scientifically and technically accurate and is sufficient to make a determination of significance on environmental effects.

ID	Project Effects Link to CEAA 2012	Reference to EIS guidelines	Reference to EIS	Context and Rationale	Specific Question/ Request for Information
FNIHB-01	5(1)(a)(i) Fish and Fish Habitat 5(1)(a)(ii) Aquatic Species	7.2 Predicted changes to the physical environment. /Fish and fish habitat (7.3.1)	Ch 9 . Change in habitat availability, quality and use	<p>The Proponent highlights the importance of fishing among Indigenous groups from the waters off NL - for food, social and ceremonial purposes, and the concerns from Indigenous groups on the various species due to their importance and status as species at risk.</p> <p>The Proponent should provide more detail on potential risks of accidents on the water quality (water pollution) fish/marine life, and aquatic species including potential contaminants of concern.</p>	<p>What is the implication to country foods of Indigenous Peoples (fish/shellfish, shore birds and marine mammals migrating to the North). Are there any risks due to contamination? Provide information on whether there will be communication plans developed to inform the Indigenous groups on consumption safety? Are there any potential impacts on the health/well-being of the Indigenous groups (ie changes in the availability, quality of food sources).</p>

	5(1)(c)(iii) Current Use of Lands and Resources for traditional purposes	7.3.7 Indigenous People	Ch 15. Cumulative effects.	<p>Indigenous communities have deep cultural and spiritual connections to their lands and resources. Project activities such as clearing of land for infrastructure development, can lead to the destruction of natural habitats, and wildlife.</p> <p>There is also the potential cumulative environmental effects that may result in changes to current use of lands and resources for traditional purposes and could result in negative health implications for Indigenous communities (ie due to loss of traditional food sources, and use of land for cultural purposes).</p>	Consider how, and describe the potential impacts in changes to current use of lands and resources for traditional purposes may affect the ability for Indigenous groups to carry out their traditional activities, and how this may impact mental health and well-being, including food security.
FNIHB -02	5 (1)(c)	5. Engagement with Indigenous groups and concerns raised	Ch 3. Consultation and Engagement:	<p>Suncor initiated engagement with Indigenous groups in May 2019 to introduce the Project and inquire about potential interests and concerns as well as preferred methods of engagement.</p> <p>The Proponent should indicate planned and ongoing</p>	Provide updated information on engagement sessions with Indigenous groups, issues raised by each group, and outcomes of the meetings. Include Indigenous groups that were contacted, but

				participation by Indigenous groups, indicating any concerns or issues raised, and how these will be incorporated.	where no meeting has yet been realized.
FNIHB-03	5(1)(c)(i) Aboriginal Peoples Health/ socio-economic conditions	5. Engagement with Indigenous groups and concerns raised/ 3-120 Table 3.7	Table 4.1 Concerns expressed by Indigenous groups	Indigenous groups are concerned about potential impacts of impacts to fishing and fishing rights. Proponent should ensure the rights and interests of Indigenous communities are respected. Collaboration and consultation with Indigenous peoples are essential to address any concerns and maintain relationships	Provide updated information on engagement with the different Indigenous groups outlining their specific concerns to the project. Indicate how the project will work closely with the Indigenous groups to find solutions to the issues raised.

ANNEX 3: Advice to the proponent

Table 3: Additional advice to the proponent, such as guidance or standard advice related to your departmental mandate

ID	Reference to EIS	Context and Rationale	Advice to the Proponent
<p>Create an ID # for each item</p> <p>e.g. CEAA-1, DFO-1</p>	<p>Identify which section(s) of the EIS report and appendices are related to the comment (Volume, section, page number).</p> <p>e.g. Part 2, section 6.4.1 Fish and fish habitat</p>	<p>Provide the context of why you are providing the advice to the proponent.</p> <p>e.g. This is standard advice provided to proponents regarding applications for Disposal at Sea permits.</p>	<p>Provide specific advice to the Proponent that would not be considered an information requirement (Annex 2) to help determine the sufficiency of the EIS. This may include the guidance or standard advice related to your departmental mandate. Make clear whether this information pertains to the environmental assessment or the regulatory phase.</p> <p>e.g. Please refer to document XXX on website ZZZ that describes the permitting process required for any Disposal at Sea permit under CEPA 1999.</p>