



Environmental Health Program (EHP)
Regulatory Operations and Enforcement Branch, Health Canada
9700 Jasper Ave, 9th Floor
Edmonton, AB
T5J 4C3

December 12, 2019

Jennifer Howe
Project Manager,
Impact Assessment Agency of Canada
Prairie and Northern Region
9700 Jasper Ave, 11th Floor
Edmonton, AB
T5J 4C3

Subject: Health Canada's Response to the Determination of Impact Assessment Requirement for the Prairie Lights Power Project

Dear Ms. Howe,

Thank you for your letter dated November 22, 2019 requesting Health Canada's comments on the Initial Project Description provided by Prairie Lights Power GP Inc. for the Prairie Lights Power Project, dated November 18, 2019.

Health Canada participates in the impact assessment process as a federal authority under the *Impact Assessment Act* (IAA). Health Canada makes available specialist or expert information or knowledge in its possession, at the request of the Impact Assessment Agency of Canada (the Agency).

The objective and scope of Health Canada's review of the Project Description is to verify that the potential health impacts of projects are properly identified for the purpose of determining whether a federal impact assessment is required. Health Canada has reviewed the Project Description and provided input, where appropriate, in the attached Federal Authority Advice Record. Should the Agency determine that an impact assessment is required for the Project, Health Canada can provide expertise on issues that are addressed within its departmental mandate and federal jurisdiction.



Should you have any questions concerning Health Canada's response, please contact the undersigned.

Sincerely,

Chantal Roberge
Director, Environmental Health and Internationally Protected Persons Programs
Regulatory Operations and Enforcement Branch
Health Canada
Phone #: 514-796-6339

cc: Suzanne Leppinen, Director, Chemical and Environmental Health Management
Bureau, Healthy Environments and Consumer Safety Branch, Health Canada
cc: Kathleen Buset, Manager, Healthy Environments and Consumer Safety Branch, Health
Canada
cc: Brenda Woo, Regional Manager, Environmental Health Program Alberta Region,
Health Canada
cc: Michael Rybansky, Environmental Assessment Specialist, Environmental Health
Program Alberta Region, Health Canada

Attachment: Federal Authority Advice Record: Authority and Summary of Issues
Prairie Lights Power Project – Prairie Lights Power GP Inc., File: 005719
December 12, 2019



ATTACHMENT: November 22, 2019
Federal Authority Advice Record
Response due by December 12, 2019
 Prairie Lights Power Project – Prairie Lights Power GP Inc.
 Agency File: 005719

Department/Agency	Health Canada
Lead IA Contact	Brenda Woo
Full Address	9700 Jasper Avenue, Edmonton, Alberta T5J 4C3
Email	brenda.woo@canada.ca
Telephone	(780) 495-0433
Alternate Departmental Contact	michael.rybansky@canada.ca

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1. Is it probable that your department or agency may be required to exercise a power or perform a duty or function related to the Project to enable it to proceed?

If yes, specify the Act of Parliament and that power, duty or function.

Not Applicable.

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2. Is your department or agency in possession of specialist or expert information or knowledge that may be relevant to the conduct of an impact assessment of the Project?

Specify as appropriate.

As a federal authority, Health Canada will provide specialist or expert information or knowledge in the Department's possession (expertise) to support the assessment of impacts on human health from projects considered individually and cumulatively under the *Impact Assessment Act* (IAA). The Department provides expertise in the areas described below; it does not play a regulatory role. How the expertise provided by Health Canada will be used in the impact assessment process will ultimately be determined by the reviewing body(ies). It should also be noted that expertise related to assessing human health that is relevant to Impact Assessments may be held by other federal, provincial, and municipal partners, reflecting the shared jurisdiction for environmental and human health within Canada.

There are many determinants of health, from the economic environment to a person's individual characteristics¹.

To support the implementation of the IAA, Health Canada can provide expertise in the following areas:

- Air quality
- Recreational and drinking water quality
- Traditional foods (country foods)
- Noise
- Methodological expertise in conducting human health risk assessment (HHRA)
- Methodological expertise in conducting health impact assessment (HIA)
- Electromagnetic fields
- Radiological emissions
- Public Health Emergency Management of Toxic Exposure Events

Available Health Canada guidance:

¹ Government of Canada (<https://www.canada.ca/en/services/health/determinants-health.html>)



To date, Health Canada has published the following guidance documents for evaluating human health impacts in impact assessment:

Guidance for Evaluating Human Health Impacts in Environmental Assessment:

- Human Health Risk Assessment
- Air Quality
- Water Quality
- Country Foods
- Noise
- Radiologic Impacts

<https://www.canada.ca/en/services/health/publications/healthy-living.html#a2.5>

Guidance prepared by Health Canada on management of crude oil incidents titled "Guidance for the environmental public health management of crude oil incidents: a guide intended for public health and emergency management practitioners" is available as a PDF and in html format through the following link:

<http://publications.gc.ca/site/eng/9.849592/publication.html>

3. Has your department or agency considered the Project; exercised a power or performed a duty or function under any Act of Parliament in relation to the Project; or taken any course of action that would allow the Project to proceed in whole or in part?

Specify as appropriate.

No.

4. Has your department or agency had previous contact or involvement with the proponent or other party in relation to the Project? (for example, enquiry about methodology, guidance, or data; introduction to the project)

Provide an overview of the information or advice exchanged.

No.

5. Does your department or agency have additional information or knowledge not specified, above?

Specify as appropriate.

No.

6. From the perspective of the mandate and area(s) of expertise of your department or agency, what are the issues that should be addressed in the impact assessment of the Project, should the Agency determine that an impact assessment is required?

For each issue discussed, provide a concise, plain-language summary that is appropriate for inclusion in the Summary of Issues.

For a project to pose a potential risk to human health through exposure to chemical substances, three criteria must be present: the potential for emissions or the release of contaminants of potential concern (COPCs), potential human receptor(s), and existing pathway(s) for human exposure to COPCs. Human health may also be affected by noise emissions that reach nearby human receptors.



Based on the limited information provided in the initial Project Description, Health Canada has identified the following key issues that may be relevant to the Prairie Lights Power Project. This is not to be construed as an exhaustive list of issues pertaining to human health for this project.

Air quality

Ambient air quality may be affected by exhaust emissions from machinery, fugitive dust, and fuel combustion by-products during both construction and operation. There is a particular concern already noted by the proponent where exceedances of the Canadian Ambient Air Quality Standards 1-hour and annual targets for 2020 and 2025 are predicted for nitrogen dioxide (NO₂). The guiding principles of continuous improvement and keep clean areas clean (CI/KCAC) are intended to ensure that air quality does not deteriorate but is maintained or improved to the extent practicable. Maintaining or improving air quality minimizes risk to human health and the environment for the benefit of current and future generations.

Noise

Noise levels may increase due to machinery use, drilling activities, and increased traffic during the construction and operation phases. Health effects on human receptors may vary based on construction timing and may be limited due to the distance to the closest permanent residence.

Water Quality

Ground water may be impacted by spills from liquefied natural gas, petroleum products, and/or other chemical spills during construction and/or operation of the facility. Local alterations to ground water patterns may also affect the quality of potable water sources, particularly for land users.

Chantal Roberge

Name of Departmental / Agency Responder

Director, Environmental Health and Internationally Protected Persons Programs

Title of Responder

December 12, 2019

Date

<Original signed by>

CHANTAL ROBERGE

