



Environmental Health Program  
Regulatory Operations and Enforcement Branch, Health Canada  
Suite 910, 9700 Jasper Avenue  
Edmonton, AB  
T5J 4G3

March 30, 2020

Andrea Raska  
Project Manager  
Impact Assessment Agency of Canada  
Pacific and Yukon Region  
Suite 210A, 757 West Hastings Street  
Vancouver, BC  
V6C 3M2

**Subject: Health Canada's Response to the Designation Request under *the Impact Assessment Act* for the West Path Delivery 2022/2023 Projects**

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Dear Andrea Raska,

Thank you for your email dated March 10, 2020 requesting Health Canada's comments on the request to designate the West Path Delivery 2022/2023 Projects under the *Impact Assessment Act* (IAA).

Health Canada participates in the impact assessment process as a federal authority under the 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), review panels, and responsible authorities, among others.

The objective and scope of Health Canada's review of the available information is to determine if the Projects have potential health impacts for the purpose of determining whether the Projects should be designated under the IAA. Health Canada has reviewed the information provided by the Agency and available on the Canadian Impact Assessment Registry. As requested by the Agency, Health Canada has provided input, where appropriate, in the attached Federal Authority Advice Record (FAAR). Should the Projects be designated under the IAA, Health Canada can provide expertise on issues that are addressed within its departmental mandate.



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

Sincerely,

<Original signed by>

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  
Kathleen Buset, Manager, Healthy Environments and Consumer Safety Branch, Health  
Canada  
Brenda Woo, Regional Manager, Environmental Health Program Alberta Region,  
Health Canada  
Melissa Gorman, Environmental Assessment Specialist, Environmental Health  
Program Alberta Region, Health Canada

Attachment: FAAR: Designation Request under IAA, NGTL and Foothills West Path Delivery  
2022/2023 Projects

**ATTACHMENT: Federal Authority Advice Record: Designation Request under IAA**  
**Response due by March 30, 2020**  
NGTL and Foothills West Path Delivery 2022/2023 Projects

Department/Agency	Health Canada
Lead Contact	Brenda Woo
Full Address	Suite 910, 9700 Jasper Ave Edmonton, Alberta T5J 4G3
Email	hc.ia-ei.sc@canada.ca
Telephone	780-495-5766
Alternate Departmental Contact	Melissa Gorman 780-495-4574

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1. Has your department or agency considered whether it has an interest in 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 (including provision of financial assistance) that would allow the Project to proceed in whole or in part?

Specify as appropriate.

Not applicable.

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2. 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 that power, duty or function and its legislative source.

Not applicable.

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3. If your department or agency will exercise a power or perform a duty or function under any Act of Parliament in relation to the Project, will it involve public and Indigenous consultation?

Specify as appropriate.

Not applicable.

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4. Is your department or agency in possession of specialist or expert information or knowledge that may be relevant to any potential adverse effects within federal jurisdiction caused by the Project or adverse direct or incidental effects stemming from 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 characteristics<sup>1</sup>.

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

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5. Has your department or agency had previous contact or involvement with the proponent or other parties in relation to the Project?

Provide an overview of the information or advice exchanged.

No.

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6. From the perspective of the mandate and area(s) of expertise of your department or agency, does the Project have the potential to cause adverse effects within federal jurisdiction or adverse direct or incidental effects as described in section 2 of IAA? Could any of those effects be managed through legislative or regulatory mechanisms administered by your department or agency? If a licence, permit, authorization or approval may be issued, could it include conditions in relation to those effects?

Specify as appropriate.

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 Project Notifications to the Canadian Energy Regulator, Health Canada (HC) has identified the following effects that may be relevant to the West Path Delivery 2022/2023 Projects. This is not to be construed as an exhaustive list of issues pertaining to human health for this project.

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<sup>1</sup> Government of Canada (<https://www.canada.ca/en/public-health/services/health-promotion/population-health/what-determines-health.html>)

- Ambient air quality may be affected by exhaust emissions from machinery, fugitive dust, and fuel combustion by-products during construction.
- Noise levels may increase due to machinery use, drilling activities, and increased traffic during the construction phase. Health effects on human receptors may vary based on construction timing and may be limited due to the distance to the closest permanent residence.
- Surface water and groundwater may be impacted by spills during construction of the Projects or potential leaks/spills during operation. This may have potential drinking and recreational water quality impacts to human health. The information provided indicates that some landowners / land users may have groundwater wells, thus local alterations to groundwater patterns may also affect the quality of potable water sources.
- The information provided indicates that Indigenous communities have concerns with the potential interaction of the Projects with traditional land and resource use sites, areas and resources (i.e. hunting, fishing, plant harvesting and camping). There is the potential that contaminants in water, air or soil may be taken up or deposited on traditional foods that are harvested or grown for subsistence or medicinal purposes.
- The information provided indicates that temporary worker accommodations (e.g. camps) may be required or there may be use of local accommodations within nearby communities. Depending on the number of temporary workers that may be brought into the area, the Projects may have socio-economic impacts to the area.
- There may be cumulative effects of these projects in combination with other projects.

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7. Does your department or agency have a program or additional authority that may be relevant and could be considered as a potential solution to concerns expressed about the Project? In particular, the following issues have been raised by the requestor: project splitting, impacts to Aboriginal rights, capacity funding

If yes, please specify the program or authority.

No.

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8. Does your department or agency have information about the interests of Indigenous groups in the vicinity of the Project; the exercise of their rights protected by section 35 of the *Constitution Act, 1982*; and/or any consultation and accommodation undertaken, underway, or anticipated to address adverse impacts to the section 35 rights of the Indigenous groups?

If yes, please specify.

No.

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9. Taking into account your mandate, does your department or agency have a view as to whether the Project should be designated under the *Impact Assessment Act*?

If yes, please specify.

Health Canada provides advice with respect to its mandate and areas of expertise in its response to question 6.

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10. If your department has guidance material that would be helpful to the proponent or the Agency, please include these as attachments or hyperlinks in your response.

Health Canada has published the following guidance documents for evaluating human health impacts:

*Guidance for Evaluating Human Health Impacts in Environmental Assessment:*

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

- Radiological 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>

Chantal Roberge

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Name of departmental / agency responder

Director,  
Environmental Health and Internationally  
Protected Persons Programs

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Title of responder

March 30, 2020

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Date