



March 28, 2025

Regional Assessment of the St. Lawrence River Area
Impact Assessment Agency of Canada
160 Elgin Street, 22nd floor
Ottawa, Ontario K1A 0H3

Sent via email: stlawrence-saintlaurent@iaac-aeic.gc.ca

RE: Natural Resources Canada Comments on the Draft Terms of Reference for Conducting a Regional Assessment of the St. Lawrence River Area

Attn: Stewart Lindale, Director, Regional and Strategic Assessments

Dear Stewart,

On February 27, 2025, The Impact Assessment Agency of Canada (IAAC) announced a 30-day public comment period on the Draft Terms of Reference for Conducting a Regional Assessment of the St. Lawrence River Area.

In general, Natural Resources Canada's (NRCan) comments on the draft Terms of Reference seek clarification on terminology and provisions. NRCan has diverse areas of expertise that could support the conduct phase of the assessment. This includes expertise in earth observation, natural hazards, geology and geochemistry, groundwater and hydrogeology, open science and data, and science-based decision-making tools for regional cumulative effects assessments.

Attached are NRCan's comments on the draft document. For additional information, please contact Colter Kelly (colter.kelly@nrcan-rncan.gc.ca).

Sincerely,

Colter Kelly
Senior Impact Assessment Officer,
Impact Assessment Division,
Office of the Chief Scientist

CC: Sonja Kosuta, Director General, Impact assessment and Science Capacity
Christina Clark, A/Director of Impact Assessment Division,
Jessica Coulson, Senior Advisor, Regional and Strategic Assessment

Attachment: Comments on the draft Terms of Reference for Conducting a Regional Assessment of the St. Lawrence River Area

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Comment No.	Section of the TOR	Comment	Suggestion
1	1	The introduction could use a more robust description of the region, including information on development activities, as well as historic use by requesting First Nations.	Suggest expanding the context beyond the scope of the request process to include historical use and development in the region.
2	2	Unclear what “Complementary activities” refers to. The term complementary suggests that they are associated with something, perhaps the targeted physical activities?	Suggest an alternative word, such as peripheral or non-targeted.
3	3.1	The goal only references the impacts of development activities to ecosystems, and not to people or culture in the region.	Suggest expanding to include socioeconomic relationships.
4	3.2c	Unclear if “Provide an overview of foreseeable and potential future targeted physical activities” includes scenario development? If so, what does that look like? Do “foreseeable” and “potential” have criteria like as described in the “ Technical Guidance for Assessing Cumulative Environmental Effects under the Canadian Environmental Assessment Act, 2012 ”?	Suggest clarifying the terms foreseeable and potential future targeted physical activities such that there is a clearly articulated description of what will be considered.
5	3.2c	Unclear if “Identify and analyze potential effects due to the targeted physical activities” refers to existing physical activities or includes foreseeable and potential.	Suggest clarifying if this includes past, existing and foreseeable” physical activities.
6	3.2e	Unclear why enhancement measures are not considered to the same level of detail as mitigation measures (ex: Successes and lessons learned from other jurisdictions).	Suggest adding enhancement measures in the first sub-bullet where mitigation measures are mentioned. Example text below: “Provide an overview of the different successes and lessons learned from other jurisdictions in the implementation of mitigation measures and/or enhancement measures aimed at preventing or

			reducing the negative effects or enhancing the positive effects of similar physical activities.”
7	3.2g	GBA+ and its considerations are not articulated to the same degree as other outputs.	Suggest moving as a sub-consideration under 3.2b or adding it as an assessment priority. As a standalone objective, suggest clarifying the title to make it as descriptive as that of the other outputs using words like identify, describe, or recommend.
8	4.1	Unclear if water quality and quantity is inclusive of groundwater.	Suggest adding surface and groundwater quality and quantity if that is the intended meaning.
9	4.1	Unclear what is meant by wetlands.	Suggest adding description to clarify intent (e.g., quantity, distribution, and/or function).
10	4.1	Unclear if community well-being is limited to Indigenous communities.	Suggest adding a definition to the section 2.
11	4.1	To be inclusive of municipalities etc. for community well-being, it is possible to make spiritual and cultural well-being a separate sub point here.	Suggest making a distinction between community well-being and spiritual and/or cultural well-being.
12	4.2	Unclear what is meant by “focus on activities in the assessment area”.	Suggest adding descriptors to the term “activities” for added clarity, e.g. “Targeted physical activities and complementary activities”.
13	4.2	Unclear how the targeted physical activities list was developed.	Suggest repeating the wording from definitions in the example box “likely to be subject to federal impact assessments or environmental effect assessments as per s. 82 of the Impact Assessment Act”
14	4.2	Unclear how the complimentary development activities list was developed.	Suggest repeating some wording from the definition in this section.
15	4.3	Unclear the relationship between assessment area and study zones.	Suggest reiterating in this section that study zones will be determined through engagement and uniquely described for different development activities and priorities and are different from and can extend beyond the assessment area.
16	5.2	This is the first time partner First Nations and Councils are listed.	Suggest moving the list of partner First Nations into Section 1.

17	6.3	Unclear about the timing of these engagement plans as well as other potential milestones.	Suggest adding a timeline graphic.
18	7.5	Unclear which Minister is implicated.	Specify Minister of the Environment and Climate Change or “Signatories of this Agreement”.