

ATTACHMENT

Federal Authority Advice Record: Designation Request under IAA

Response due by **December 13, 2021**

PADCOM Potash Solution Mining Project

Department/Agency	Health Canada
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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.](#)

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.](#)

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.](#)

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 and knowledge in the Department's possession \(expertise\) to support the assessment of potential 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. It should also be noted that expertise related to assessing human health that is relevant to Impact Assessments (IAs) may be held by other federal, provincial, and municipal partners, reflecting the shared jurisdiction for environmental and human health within Canada. For example, the Public Health Agency of Canada (PHAC) has expertise in the social determinants of health approach and health equity, and may provide that expertise through Health Canada, upon request from the reviewing body(ies). How the expertise provided by Health Canada and PHAC will be used in the IA process will ultimately be determined by the reviewing body(ies).

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 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.

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.

The information provided in the Environmental Act Proposal (EAP) Application is not sufficient to confirm whether there exists a potential to cause adverse effects on human health within federal jurisdiction, i.e., effects to Indigenous Peoples. The EAP Application indicated that there are several Indigenous communities within 100 km of the project, with the closest being 23 km from the Project (Table 6, pg. 60), but uncertainty remains regarding traditional land use practices in the region and potential for interactions with the Project. In order to determine the extent of any direct effects on Indigenous Peoples, Health Canada would seek to understand whether Project-related changes to air quality, water quality, noise, and country foods have the potential to affect Indigenous health. Health Canada also noted a need for clarification around the location and distance from the Project site of all potential human receptors (permanent, seasonal, or temporary), taking into consideration the different types of land uses (e.g., residential, recreational, industrial, etc.).

Health Canada does not administer legislative or regulatory mechanisms, or issue licenses, permits, authorizations, or approvals under the *Impact Assessment Act* (the Act). If the Minister of Environment and Climate Change designates the project under the Act, Health Canada can provide expertise on issues addressed within its departmental mandate to support the Agency with its review.

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 requester:
- a. Impacts on water quality through expected or accidental release (e.g., hot brine spills/leaks)
 - b. Impacts on water quantity due to withdrawal from aquifer
 - c. GHG emissions
 - d. Pipeline crossings of watercourses, rail and transmission lines
 - e. Effects to fish and fish habitat

If yes, please specify the program or authority.

Health Canada has programs related to environmental impacts to health, including recreational and drinking water quality, as noted in our response to Question 4. These programs largely focus on knowledge generation/research, and development of guidelines/standards/tools for use by relevant partners and stakeholders. At this time, there is insufficient information available to Health Canada to determine how these programs can support addressing the concerns associated with the Project.

8. 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.

Available Health Canada guidance:

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](#)

Guidance prepared by Health Canada on management of crude oil incidents is available as a PDF and in html format through the following link:

- [Guidance for the environmental public health management of crude oil incidents: a guide intended for public health and emergency management practitioners](#)

Other materials (related to the use of octadecyl for anti-caking):

- [Environment and Climate Change Canada and Health Canada. 2021. Risk Management Scope for Long-chain Aliphatic Amines \(including DPDAB CAS RN 68479-04-9\).](#)

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Paul Partridge

Name of departmental / agency responder

A/ Regional Manager

Title of responder

December 13, 2021

Date