



Natural Resources
Canada

Ressources naturelles
Canada

CIAR File No.: 83696

July 6, 2022

Anjala Puvananathan
Director, Ontario Region
Impact Assessment Agency of Canada

Sent via email to: Hydrogen-Hydrogene@iaac-aeic.gc.ca

Submitted electronically at: [Hydrogen Ready Power Plant Project - Canada.ca \(iaac-aeic.gc.ca\)](https://www.iaac-aeic.gc.ca/iaac-aeic.gc.ca)

Subject: Natural Resources Canada's Submission of a Federal Authority Advice Record for the Hydrogen Ready Power Plant Project

Dear Anjala,

On June 13, 2022 the Impact Assessment Agency of Canada (the Agency) requested that Natural Resources Canada (NRCan) review the Initial Project Description and provide input to identify its responsibilities and expertise related to the impact assessment of the proposed Hydrogen Ready Power Plant Project (the Project).

NRCan is committed to improving the quality of life of Canadians by ensuring the country's abundant natural resources are developed sustainably, competitively and inclusively. Based on provided documentation for the Project, NRCan will not be required to exercise a power or perform a duty or function under the *Explosives Act* to enable the Project to proceed. NRCan possesses some specialist or expert information or knowledge that may be relevant to an impact assessment of the Project.

During NRCan's review of the draft Initial Project Description (submitted to the Agency on March 18, 2022), NRCan commented on several topics related to climate change, including greenhouse gas emissions, emissions mitigation technology, and energy policy. Following that submission, Environment and Climate Change Canada (ECCC) and NRCan met and determined that ECCC will lead the analysis of climate-related issues for the Hydrogen Ready Power Plant Project going forward. It was agreed that, if ECCC were to require NRCan's support reviewing climate-related information during potential future stages of an assessment of the Project, ECCC would contact NRCan and request its assistance. Consequently, NRCan has communicated its relevant expertise that could support ECCC's review of climate issues (question 1 of Enclosure 2); but did not comment on any 'key issues and solutions' related to climate change for the present submission (question 2 of Enclosure 2). Please note that experts in NRCan's more established domains of expertise (e.g., explosives manufacturing/storage, seismicity, groundwater quantity, etc.) have communicated that they will not have a role or interest in an assessment of the Project.

Please find attached NRCan's Federal Authority Advice Record submission for the Project. If you have any questions, please contact me by email at Daniel.silver@nr-can-rncan.gc.ca or by phone at 613-290-1163.

Sincerely,

Daniel Silver
Impact Assessment Officer
Office of the Chief Scientist

cc: Peter Unger, Director, Impact Assessment Division, Office of the Chief Scientist
Attachment: Enclosure 2: Natural Resources Canada Federal Authority Advice Record

Enclosure 2: Natural Resources Canada Federal Authority Advice Record**Project:** Hydrogen Ready Power Plant Project**Proponent:** Eastern Power Inc.**CIAR No.:** 83696

Department/Agency: Natural Resources Canada	
Date of Advice: July 6, 2022	
Primary Contact Name, Title, Work Unit: Daniel Silver Impact Assessment Officer Office of the Chief Scientist – Impact Assessment Division	
Email: Daniel.silver@nrcan-rncan.gc.ca	Phone: 613-290-1163
Alternate Contact Name, Title, Work Unit: Sara Ryan Team Lead Office of the Chief Scientist – Impact Assessment Division	
Email: sara.ryan@nrcan-rncan.gc.ca	Phone: 613-447-3099

1. Expertise

Please identify and describe the specialist or expert information or knowledge within your department or agency that is relevant to an assessment of the Project.

NRCan possesses the following expertise that may be relevant to an assessment of the Project:

- Economic analysis related to energy projects
- Best available technology and best environmental practices to address emissions from natural gas and LNG facilities
- Canadian energy policy related to hydrogen, including Canada's Hydrogen Strategy

2. Key issues and solutions

Respond to the following **using Table 1 on page 3**

(a) From the perspective of the mandate and area(s) of expertise of your department or agency, what are the key issues that are material and relevant to decision-making and should be addressed? In identifying

key issues, be mindful of the Project's context (size, scope, geography, policy) and the definitions of *effects*,¹ *sustainability*² and *public interest*.³

(b) For each **key** issue:

- i. Identify the relevant valued component(s) within your mandate and describe the key pathway of effect, or describe the nature of the issue. This may consider⁴ positive and negative effects on components of the environment or on health, social and economic conditions.
- ii. Identify any clarifications or commitments the Proponent could make in its Detailed Project Description and Response to the Summary of Issues that would build confidence that issues can be addressed and managed without further impact assessment⁵, or that can help focus the Tailored Impact Statement Guidelines⁶, if an impact assessment is required.
- iii. Identify, at a very high-level, any information or studies that should be required of the Proponent in the Tailored Impact Statement Guidelines, if an impact assessment is required.⁷

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

Given NRCan's mandate and areas of expertise, and discussions with ECCC regarding an interdepartmental approach to the review of climate-related information during impact assessment, NRCan does not have any input on key issues or solutions at this time.

3. Operational guidance and powers, duties and functions

(a) Within the mandate and area(s) of expertise of your department or agency, list specific operational policies or guidance documents that could help address issues and manage effects relevant to the project context.

¹ Note: *effects*, *direct and incidental effects*, and *effects within federal jurisdiction* are defined in section 2 of the *Impact Assessment Act*, which can be found at <https://www.canada.ca/en/impact-assessment-agency/corporate/acts-regulations/legislation-regulations.html>

² Guidance: Considering the Extent to which a Project Contributes to Sustainability <https://www.canada.ca/en/impact-assessment-agency/services/policy-guidance/practitioners-guide-impact-assessment-act/guidance-considering.html>

³ Policy Context: Public Interest Determination under the *Impact Assessment Act* <https://www.canada.ca/en/impact-assessment-agency/services/policy-guidance/public-interest-determination-under-impact-assessment-act.html>

⁴ Other considerations may include sources of high uncertainty that complicate predictions; the purpose and need for the Project and selected alternatives.

⁵ This could mean that mitigation measures that the proponent has committed to in the Detailed Project Description are referenced in the Tailored Impact Statement Guidelines.

⁶ For example, regulatory instruments, operational guidance or well-understood mitigation and monitoring measures of proven effectiveness.

⁷ Federal authorities are being asked what should be included in the Tailored Impact Statement Guidelines with specific rationale that is commensurate to the project context. Please also identify studies that are not necessary based on the information provided by the proponent and based on project context.

N/A.

(b) List the potential powers, duties, or functions, including federal funding, that your department or agency may be required to exercise or perform to enable the Project to proceed, in whole or in part. Validate whether the information in the Initial Project Description is accurate.

Based on provided documentation, NRCan will not be required to exercise a power or perform a duty or function to enable the Project to proceed.

(c) For each power, duty or function:

- i. Explain any associated framework to address effects on valued components within your mandate.
- ii. Describe any Indigenous consultation activities that would occur, potential timelines for Indigenous participation, and how potential impacts to Indigenous communities are addressed by your department or agency.
- iii. Describe any public participation opportunities that would occur, and potential timelines for public participation.

N/A.

(d) Has your department or agency already 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.

NRCan has not exercised a power or performed a duty or function in relation to the Project; and it has not taken any course of action that would allow the Project to proceed.

4. Is there any additional information related to the geographic context of the Project (e.g. potential effects to Indigenous protected and conserved areas, migratory bird sanctuaries, federal species at risk) for which your department or agency has information or authority?

N/A.

Table 1: Key Issues and Solutions that are Material and Relevant to Decision-making

Comment ID	Document Reference	Valued Component	Description of Key Issue (Context and Rationale)	Solutions for the Proponent	Summary of Issues
<p>Please identify comments by organization and comment number.</p> <p>e.g.: IAAC-01</p>	<p>If the comment is related to a specific section of the Initial Project Description, please provide a reference.</p> <p>You may also choose to copy the relevant text here.</p>	<p>Identify the valued component(s)—within the mandate of your department or agency—to which the effect or issue applies.</p> <p>This may include components of the environment, health, social or economic conditions.</p>	<p>Provide context for the effect or issue. Describe, to the extent possible:</p> <ul style="list-style-type: none"> • The positive or negative pathway of effect or nature of the issue • Any powers, duties or functions that your department or agency has that may mitigate, manage, or set conditions related to the effect • Operational guidance or standard and well-understood mitigation or monitoring measures that would address the effect • Any established or emerging policies or directives that are relevant • The potential for residual effects after mitigation has been applied 	<p>Where applicable and necessary,</p> <ul style="list-style-type: none"> • provide instructions for how the Proponent would build confidence about the management of the potential effect, in the Detailed Project Description and Response to the Summary of Issues, and/or • identify, at a high-level, required information or studies to assess the effects, should an impact assessment be required (or templated requirements that are not relevant to the Project). 	<p>For issues and effects to be included in the Summary of Issues, provide a concise, plain language synopsis.</p>

Please insert additional rows as necessary.