



TO: Debra Myles, Senior Advisor, Impact Assessment Agency of Canada
FROM: Impact Assessment Team, Health Canada
DATE: July 22, 2022

SUBJECT: Proposed Salish Sea Regional Assessment: Health Canada Input

Thank you for your email dated July 7, 2022, requesting Federal Authority input on the proposed Salish Sea Regional Assessment (RA) on the south-west coast of British Columbia (BC).

It is Health Canada's understanding that the Salish Sea Indigenous Guardians Association (SSIGA) are requesting that the proposed RA would ultimately enable sustainable regional development, which could be monitored and adjusted according to changing environmental conditions. The initial focus of the RA would be on impacts to traditional food sources, starting with water quality effects and then moving on to existing infrastructure, marine traffic, and ongoing and foreseeable projects. The RA scope is the entirety of the Salish Sea (both Canada and the US), and includes its inner bodies of water along with the traditional fishing territories of Treaty Nations.

Health Canada's knowledge of the Salish Sea is in large part based on information provided by participants during various federal environmental or impact assessment (EA or IA) processes. Food quality and availability have come up as areas of concern for Indigenous groups during the EAs for several proposed projects in the Salish Sea. In addition, when assessing human health, Indigenous peoples in Canada can be particularly vulnerable to changes in environmental conditions and to the impacts of climate change¹, and there are many Indigenous communities with strong connection to the Salish Sea.

Health Canada is aware that the Lower Fraser River and Salish Sea are already heavily impacted by existing developments in the area. For example, the Review Panel Report for the proposed Roberts Bank (marine) Terminal 2 (RBT2) project concluded that many ecosystem components and values (Southern Resident Killer Whale, salmon, crab, and the practice of rights on the waterways) are already impacted, and these may not be resilient to additional impacts.

For project-specific IAs, Health Canada routinely provides expertise on human health as it relates to air quality, drinking and recreational water quality, country foods, noise and radiological conditions, as well as human health risk assessment and health impact assessment methods. Health Canada can also provide technical support on the following activities upon request:

- Design and delivery of outreach programs for public and Indigenous groups to increase awareness of potential risks, health impacts and mitigation strategies related to radon, chemicals, air quality and water quality;
- Development and provision of technical guidance and training to support sound management of contaminated sites;
- Provision of scientific advice, surge capacity for analytical laboratory analysis, and medical countermeasures, supplies and personnel during a chemical emergency, including a spill from pipelines or marine shipping;
- Design, implementation and interpretation of results related to human biomonitoring studies; and,
- Design, implementation and interpretation of results related to climate change impacts on the health of Canadians, their communities and their health systems, to facilitate effective adaptation.

¹ Health Canada, 2022. Health of Canadians in a Changing Climate. Chapter 2: Climate Change and Indigenous Peoples' Health in Canada. Available at: <https://changingclimate.ca/health-in-a-changing-climate/>



Health Canada is also aware of a number of programs and studies that may be relevant to the Salish Sea area, or parts thereof. IAAC is encouraged to contact the responsible organizations for additional information:

- **Burrard Inlet Action Plan / Burrard Inlet Water Quality Objectives**

The Burrard Inlet Action Plan is a Tsleil-Waututh Nation-led initiative to improve the health of Burrard Inlet by 2025. The development of the Burrard Inlet Water Quality Objectives (WQOs) is the first of six priorities comprising the Action Plan. The WQOs are a collaborative effort led by Tsleil-Waututh Nation with the BC Ministry of Environment and Climate Change Strategy for the protection of human consumption of shellfish, human consumption of finfish, aquatic life, wildlife, cultural practices, recreational uses, and institutional uses.

- **We All Take Care of the Harvest** (WATCH)

WATCH is a BC First Nations Health Authority pilot project that addresses seafood safety, security and sovereignty in the context of climate change. The purpose of the project is to help coastal communities and their members decide if and when their seafood is safe to harvest.

- **Food, Environment, Health and Nutrition of First Nations Children and Youth** (FEHNCY)

Indigenous Services Canada's First Nations Inuit Health Branch (ISC-FNIHB), in collaboration with the Assembly of First Nations and academia, have initiated the FEHNCY study. FEHNCY is a cross-Canada research study that will look at the nutrition, health and environment of First Nations children and youth aged 3-19 in communities through partnerships and community participation.

- **First Nations Food, Nutrition and Environment Study** (FNFNES)

Health Canada previously collaborated on the First Nations Food, Nutrition and Environment Study (2008-2018) led by Indigenous Services Canada, which includes results from BC from 2008-2009.

- **Environmental Contaminants Program**

The First Nations Health Authority administers the Environmental Contaminants Program in BC. The Environmental Contaminants Program may be accessed by Indigenous communities to complete community-based studies, such as food consumption surveys. In general, the Environmental Contaminants Program was designed to support community-based studies and community capacity on issues and risks that do not have a party(ies) that can be held accountable.

- **Federal Contaminated Sites Action Plan** (FCSAP)

Some **federal contaminated sites** that received or are receiving assessment or remediation funding under the FCSAP program are located within the regional assessment area. Any information relating to these sites is the property of the federal custodian, who would need to be contacted directly for access to any information.



- **Inter-Sectoral Action Fund**

The Public Health Agency of Canada administers the Inter-Sectoral Action Fund. Two short-term grants for community-led projects are ongoing in Victoria and Vancouver, related to building community capacity for addressing diverse social determinants of health.

- **SCƏW'AO ƏN MƏSTEY ƏX^w Tsawwassen First Nation (TFN) Community Health and Food Security Study**

This TFN community health and food security study (dated September 20, 2021) was completed as part of the Vancouver Fraser Port Authority's participation in the environmental assessment for the proposed RBT2 marine terminal project. The TFN study explored several topics related to TFN's food security and members' ability to rely on their traditional food system, including potential impacts on food security from RBT2.

Health Canada has limited resources to develop new information or programs in support of RAs under the Impact Assessment Act (IAA). However, the following existing programs or initiatives may yield specialist or expert information or knowledge relevant to a Salish Sea RA:

- **Health Canada's HealthADAPT Program**

This program provides \$3 million of contribution funding (over three years) to 10 Canadian health sector projects at the local, regional, provincial and territorial levels. These projects aim to build health authority capacity by enabling them to undertake climate change and health risk assessments, develop plans, and implement adaptations. Vancouver Coastal Health² and the BC First Nations Health Authority³ received funding to support their climate change and health efforts. Health Canada also provides related, ongoing technical support through its participation in meetings, a community of practice, and development of resources and guidance.

- **Health Canada's Impact Assessment Research Fund**

This fund provides annual funding for expert groups internal to the Department (and their partners) to address knowledge gaps and support novel scientific efforts that contribute to the health-related knowledge and expertise provided to reviewing bodies during IA processes. The following research project is currently underway:

- A master database of mercury and methylmercury levels, as well as a list of proposed and validated methylmercury-to-mercury ratios (for tissues by species and tissues by species type [e.g., marine mammal]), in top country food items contributing to mercury exposure among Indigenous communities across Canada.

We hope this information is useful in informing the Minister's decision regarding whether or not a regional assessment (RA) should be undertaken in the Salish Sea. If Health Canada can be of further assistance, please contact the IA team.

² For more information, please visit: <http://www.vch.ca/public-health/environmental-health-inspections/healthy-environments/climate-change-and-health>

³ WATCH pilot program referenced previously