

Sorel-Tracy Port Terminal Project
Draft Impact Assessment Report – ECCC Comments

Contact Details

Submission Date	2026-07-24
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Table 1. ECCC comments – Draft Impact Assessment Report – Sorel-Tracy Port Terminal Project

Identification No.	Reference to Draft Report	Background and Rationale	Comment
ECCC-01	2.1.1 Assessment of effects P. 22	Monitoring of runoff water quality from paved and unpaved areas, as well as groundwater monitoring, would be required to assess the effects of the project on the aquatic environment, evaluate the effectiveness of mitigation measures and determine the need to implement adaptive measures (Section 2.1.4).	ECCC recommends specifying that this refers to the implementation of adaptive management measures.
ECCC-02	2.1.4 Mitigation, offsetting and follow-up measures P. 27	Develop and implement, in consultation with ECCC and Indigenous groups, modified or additional mitigation measures when water quality monitoring indicates exceedances of the established criteria, and where such measures are deemed necessary to mitigate adverse federal effects on fish and fish habitat resulting from changes in water quality.	This wording suggests that ECCC and Indigenous groups would be consulted once exceedances are observed, which would imply a delay during which effects on fish habitat could occur. ECCC is of the view that any delay in the implementation of mitigation measures should be avoided and recommends revising the text to align with condition 3.3.4.
ECCC-03	3.2 Mitigation measures recommended by IAAC P. 41	The marine spill modelling conducted as part of the impact assessment provides valuable information that can support environmental emergency preparedness and response, particularly in the event of an accidental release of fuel resulting from a vessel-related incident. More specifically, this modelling makes it possible to identify potential hydrocarbon trajectories, vulnerable coastal areas, valued components that could be affected, the probable extent of contamination, and the estimated time required for contamination to reach various environmental components under different environmental conditions. This information can be used to guide the development of effective response strategies, the pre-positioning of response equipment and the identification of priority areas to be protected in the event of an emergency.	ECCC recommends that the Spill Response Plan take into account the results of the marine spill modelling (AtkinsRéalis, Modélisation de la trajectoire des particules d'hydrocarbures en cas de défaillances [Hydrocarbon particle trajectory modelling for malfunction scenarios]; Ref. No. 695075-4E-L13-02) and that these results be incorporated into emergency preparedness and response measures. This should include, in particular: - the identification of sensitive receptors; - the establishment of protection priorities; - the determination of strategic locations for the deployment of response equipment; - expected response times; and - hydrocarbon recovery strategies for credible marine accident scenarios involving a fuel release. This approach would help ensure that the knowledge gained through the impact assessment is translated into concrete operational measures for emergency preparedness and response.
ECCC-04	6. Extent to which project effects contribute to Canada's climate change commitments P. 97	The project is expected to generate greenhouse gas (GHG) emissions during construction and operation. However, the GHG emissions avoided as a result of the project are expected to result in a net reduction of GHG emissions in Canada. In addition, the Proponent has committed to developing a credible plan to achieve net-zero emissions by 2050.	ECCC is of the view that the text shown in red should be revised to reflect the level of uncertainty associated with this statement. For example, if the project results in avoided GHG emissions, it could contribute to a net reduction in GHG emissions in Canada.
ECCC-05	6.2 Conclusion P. 98	Based on the analysis above, IAAC is of the view that the potential effects of the project would contribute to a small extent to Canada's ability to achieve its 2035 greenhouse gas emissions reduction target and its 2050 net-zero greenhouse gas emissions objective.	As the analysis contains a degree of uncertainty, the wording of the report should reflect this. It would be more accurate to state that the potential effects of the project could contribute to a small extent to Canada's ability

			to achieve its 2035 greenhouse gas emissions reduction target and its 2050 net-zero greenhouse gas emissions objective.
ECCC-06	2.2 Migratory birds P. 29–30	Section 2.2 addresses, among other things, the residual adverse effects that the project could have on migratory birds. However, it does not mention the effects of light generated by project activities during the construction and operation phases, even though specific mitigation measures addressing light-related disturbances are identified in the document of potential conditions.	ECCC recommends that the Impact Assessment Report include a discussion of the effects of light on migratory birds, particularly given that condition 4.4 of the document of potential conditions specifically refers to this issue.
ECCC-07	2.2.3 Cumulative effects P. 35	The Eastern Wood-pewee is one of the most common and widespread songbirds in the forests of eastern North America. According to COSEWIC, ²¹ the species appears to be relatively tolerant of various types of habitat modification. Its decline is believed to be primarily attributable to the significant reduction in the availability of flying insects throughout its migratory range, as well as habitat loss or degradation within its wintering range in South America. According to the proposed management plan for the species, residential and commercial development, including industrial areas, constitutes a threat with a negligible impact. However, where such development results in habitat loss, the impact becomes more significant. According to ECCC , the Eastern Wood-pewee population has shown a strong increase in the Lake Saint-Pierre region since 1980. ²²	As IAAC did not consult ECCC on this matter or on the analysis of the project's effects on migratory birds, it would be more appropriate to refer directly to the author of the publication (Jobin, 2023) to avoid any ambiguity. This comment also applies to other instances in Section 2.2.3 of the draft Impact Assessment Report where ECCC is cited.
ECCC-08	2.2.3 Cumulative effects P. 35	With respect to the Wood Thrush, the principal threats facing the species are nest predation and parasitism by the Brown-headed Cowbird. Habitat fragmentation can exacerbate the effects of predation and parasitism, as the Brown-headed Cowbird and several predators are more commonly associated with open or fragmented habitats. The trend in the species' occurrence within the Lake Saint-Pierre region ²⁵ remains stable.	Reference 25 relates to spills and does not appear to be appropriate for this text. ECCC recommends correcting the reference number associated with the excerpt above.
ECCC-09	2.1.4 Mitigation measures P. 27 Follow-up program P. 29 Human health P. 138	The draft report states that the Proponent must “develop and implement, in consultation with ECCC and Indigenous groups, modified or additional mitigation measures when water quality monitoring indicates exceedances of the established criteria.” The Draft Report also states: “Develop and implement, in consultation with ECCC and Indigenous groups, water quality monitoring with the following objectives.” Finally, it states that the Proponent must “Prior to construction, develop, in consultation with ECCC and HC, and implement, during construction and operation, a follow-up program to verify the effectiveness of mitigation measures with respect to the environmental effects of the emission of suspended particles, SO ₂ and NO ₂ to the air on human health at the location of the nearest human receptors.”	ECCC recommends that the report refer to the authorities having jurisdiction rather than specifically to ECCC. In addition, the reference to the authorities having jurisdiction should apply only to the development of the measures and programs described in the first two excerpts above, and not to their implementation.