

Sorel-Tracy Port Terminal Project
Potential Conditions – ECCC Comments

Contact Information

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Table 1. ECCC comments – Potential conditions – Sorel-Tracy Port Terminal Project

Identification No.	Reference to the Report	Background and Rationale	Comment
ECCC-01	Section 3 – Fish and fish habitat Condition 3.3 P. 10 of 21	Condition 3.3 requires water quality monitoring but does not provide for monitoring of local hydrodynamic conditions (e.g., changes in currents, flow velocities, water levels, and erosion and sedimentation processes). These parameters are essential to the quality and maintenance of fish and fish habitat, as they directly influence the physical conditions used by fish for feeding, spawning and movement, as well as the transport and deposition of sediments. Hydrodynamic monitoring is therefore complementary to water quality monitoring and is necessary to obtain a comprehensive assessment of the project’s effects on the aquatic environment and fish habitat.	ECCC recommends adding a hydrodynamic monitoring program to verify the accuracy of the predictions in the impact assessment regarding changes to local flow conditions resulting from the works and their operation. This program should, in particular: • measure current velocities, current directions and water levels during the various phases of the project in order to verify the representativeness of the simulation scenarios for the selected option and their ability to capture the variability of hydrological conditions that may be encountered; • assess the effects of the works and the changes resulting from the implementation of the terminal on erosion, sedimentation and sediment transport processes, as well as the resulting effects on fish habitat; • compare observed conditions with the predictions of the hydrodynamic models used in the impact assessment to confirm that the simulated scenarios adequately represent actual conditions, and provide for corrective measures where discrepancies or unforeseen effects are identified.
ECCC-02	Section 3 – Fish and fish habitat Condition 3.3.2 P. 10 of 21	ECCC recommends clarifying the wording of condition 3.3.2 and distinguishing runoff monitoring from surface water monitoring during the various phases of the project.	ECCC recommends distinguishing runoff monitoring (including water from sediment dewatering) conducted during the construction and operation phases, for which the applicable criteria are set out in condition 3.3.4, from surface water monitoring, for which monitoring of suspended solids (SS) in the river would be required during the construction phase. For this monitoring, ECCC recommends following the methodology (including the applicable criteria) set out in the <i>Recommendations for the management of suspended solids (SS) during dredging activities</i> developed by Environment and Climate Change Canada and the Quebec Department of Environment, the Fight Against Climate Change, Wildlife and Parks.
ECCC-03	Section 3 – Fish and fish habitat Condition 3.3.4 P. 10 of 21	Condition 3.3.4 states: “if the results of the monitoring referred to in condition 3.3.2 indicate that the surface water quality parameters exceed the thresholds of the <i>Canadian Water Quality Guidelines for the Protection of Aquatic Life of the Canadian Council of Ministers of the Environment</i> , the Proponent shall implement modified or additional mitigation measures in accordance with condition 2.7.4.”	ECCC recommends including in the wording of this condition any other applicable criteria for the protection of aquatic life, as is the case in the draft Impact Assessment Report.
ECCC-04	Section 5 Health and Socioeconomic Conditions Condition 5.1	The wording of condition 5.1 should be clarified to improve clarity and facilitate understanding.	ECCC proposes the revisions shown in red below to the wording of the condition: 5.1 The Proponent shall implement measures to control fugitive emissions of suspended particles, <i>as well as emissions of SO₂ and NO₂ from equipment, vehicles, vessels and other combustion sources</i>

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ECCC-05	Section 5 Health and Socioeconomic Conditions Condition 5.5 P. 13 of 21	As air quality in the project area is a significant public concern, ECCC recommends clarifying condition 5.5, which addresses the monitoring program for this component.	ECCC recommends adding to condition 5.5 that the monitoring program must establish baseline values or alert thresholds applicable to each monitored contaminant, taking into account, among other things, the applicable air quality standards or criteria.
ECCC-06	Section 3 – Fish and fish habitat Condition 3.3 P. 10 of 21 Section 5 Health and Socioeconomic Conditions Condition 5.5 P. 13 of 21	Condition 3.3 states: “The Proponent shall develop, prior to construction and in consultation with Indigenous groups and Environment and Climate Change Canada, and implement, throughout all phases of the designated project, a follow-up program to verify the accuracy of the impact assessment...” Condition 5.5 states: “The Proponent shall develop, prior to construction and in consultation with Environment and Climate Change Canada and Health Canada, and implement, throughout all phases of the designated project, a follow-up program to verify the accuracy of the impact assessment...”	ECCC recommends replacing “Environment and Climate Change Canada” with “the authorities having jurisdiction.”
ECCC-07	Section 10 – Accidents and Malfunctions Condition 10.1.3 P. 16 of 21	Although the Impact Assessment Report indicates that a minimum distance of 30 m will be maintained between vehicle refuelling and maintenance areas and any water environment or wetland, condition 10.1.3 does not specify any minimum distance between these facilities. This discrepancy creates an inconsistency between the commitments described in the Impact Assessment Report and the requirements established in the project conditions.	ECCC recommends amending condition 10.1.3 to include the minimum distance of 30 m between vehicle refuelling and maintenance areas and any water environment or wetland in order to, first, ensure consistency between the project conditions and the Impact Assessment Report and, second, protect fish and fish habitat in the event of an accidental spill of petroleum products.
ECCC-08	Section 4 – Migratory Birds P. 10 of 21	Section 4 addresses migratory birds; however, it does not contain any measure specifically related to the nesting period, which is nevertheless a critical stage in the life cycle of migratory birds.	The most important mitigation measure for migratory birds is to avoid carrying out activities that could harm migratory birds, their nests or their eggs during the nesting period. ECCC recommends that this key mitigation measure be incorporated into the conditions.
ECCC-09	Section 4 – Migratory Birds Condition 4.2 P. 11 of 21	Condition 4.2. states: “The Proponent shall determine , under the direction of a qualified individual, the presence or likely presence of migratory bird nests protected under the <i>Migratory Birds Convention Act, 1994</i> and its Regulations, and residences protected under the <i>Species at Risk Act</i> that may be adversely affected by any Designated Project activity prior to initiating the activity.”	ECCC recommends specifying in the wording of the condition that this determination should be conducted using non-intrusive methods.
ECCC-10	Section 4 – Migratory Birds Condition 4.3	Condition 4.3 states: “The Proponent shall establish, under the direction of a qualified individual, setback distances around any nest(s) and residence(s) whose presence or likely presence is determined pursuant to condition 4.2, within which that activity shall not occur while these nests	As this condition refers to the <i>Guidelines to Avoid Harm to Migratory Birds</i> , ECCC recommends using the terminology employed in those guidelines, namely “setback distances,” in order to avoid any confusion.

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