



CIAR File No.: 84331

March 17, 2023

Susan Tiege
A/Director, Ontario Region
Impact Assessment Agency of Canada

Submitted electronically: <https://iaac-aeic.gc.ca/050/evaluations/proj/84331>

Subject: Natural Resources Canada's Submission of a Federal Authority Advice Record for the Northern Road Link Project

Dear Colleague,

On February 21, 2023, the Impact Assessment Agency of Canada (IAAC) requested that Natural Resources Canada (NRCan) provide its specialist or expert information or knowledge with respect to the Northern Road Link Project (the Project) via the Federal Authority Advice Record (FAAR) as per subsection 13(1) of the *Impact Assessment Act*.

NRCan has reviewed the Initial Project Description for the Project and provided comments on the key issues of the Project based on our areas of expertise, and any potential powers, duties or functions we may be required to exercise under the *Explosives Act* to enable the Project to proceed, which can be found in Enclosure 2.

Should you have any questions, comments, or concerns, please contact me by email at anica.madzarevic@nrcan-rncan.gc.ca or by phone at 343-571-9873.

Sincerely,

Anica Madzarevic
Impact Assessment Officer
Impact Assessment Division
Office of the Chief Scientist

cc: Sara Ryan, Team Lead, Impact Assessment Division, Office of the Chief Scientist
Sonia Roussel, Director, Impact Assessment Division, Office of the Chief Scientist

Enclosure 2: Federal Authority Advice Record – Summary of Issues, and Potential Tailored Impact Statement Guidelines and Permitting Plan

Enclosure 2: Federal Authority Advice Record – Summary of Issues, and Potential Tailored Impact Statement Guidelines and Permitting Plan

Project: Northern Road Link Project

Proponent: Marten Falls First Nation and Webequie First Nation

CIAR No.: 84331

Department/Agency: Natural Resources Canada	
Date of Advice: March 17, 2023	
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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 has specialist or expert information or knowledge relevant to an assessment of the Project in the following areas:

- Economic analysis related to mining
- Explosives storage
- Groundwater quantity
- Acid rock drainage and metal leaching
- Forestry, including biodiversity related to forest vegetation, soils, hydrology in forested areas (e.g. impacts of project activities on hydrology including peatlands and wetlands), species at risk habitat (e.g. Woodland Caribou), cumulative effects on the forested landscape and reclamation.

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.

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.

The following documents could help address issues and manage effects relevant to the project context:

- BC MOTI Technical Circular T-04/13 September 15, 2013 Evaluating the Potential for Acid Rock Drainage and Metal Leaching at Quarries, Rock Cut Sites and from Stockpiled Rock or Talus Materials used by the MOTI
- MEND 2009 Prediction Manual for Drainage Chemistry from Sulphidic Geologic Materials MEND Report 1.20.1

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 implement, 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 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 necessarily based on the information provided by the proponent and based on project context.

(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 the information provided in the Initial Project Description, NRCan may issue a licence under Section 7 of the *Explosives Act* related to the storage of explosives.

(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.

NRCan would engage and consult during the regulatory phase, as necessary, related to the issuance of a licence under the *Explosives Act*. NRCan participates in crown consultation activities as per the whole-of-government approach and addresses concerns through the IA process in providing advice to decision makers under its mandate.

(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 your department or agency aware of 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, sensitive/vulnerable health, social or economic conditions)?

NRCan is not aware of any additional information related to the geographic context of the Project.

Table 1: Key Issues and Solutions 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
NRCan-01	Northern Road Link Initial Project Description, 2023. Table 19-3 Federal Legislation, Permits and Other Authorizations, p.124.	N/A	The proponent has written that NRCan would permit the “purchase, use, storage or transportation of explosives.” NRCan does not licence the transport nor the use of explosives. The proponent may require a provincial permit for the use of explosives. Transport Canada may be listed for the transport of dangerous goods. NRCan may licence the storage of explosives.	NRCan recommends the proponent edit the information in table.	NRCan’s authority under the <i>Explosives Act</i> is not accurately represented in Table 19-3.
NRCan-02	Northern Road Link Initial Project Description, 2023. Section 15.1.4 Groundwater, p.73.	Groundwater	KBM Resources completed a desktop analysis to understand the groundwater conditions at the site. More data and field work/sampling will be undertaken as the project moves forward for characterization of the groundwater and to fill the data gaps as referenced on pg. 74.	Groundwater characterization including an appropriate groundwater model depicting the impacts of the development of the road should be included for the impact assessment. The proponent has indicated that groundwater sampling will be conducted for three events (spring, summer and fall).	NRCan recommends the proponent provide the results of the desktop study. NRCan recommends the proponent provide the data collected, results of the sampling, and any additional information on the fieldwork undertaken and the results in the next stage of the Impact Assessment process e.g., Detailed Project Description. Information on groundwater characterization, faults and fracture zones, and groundwater surface water interactions in the study area should be provided. An appropriate groundwater model with details is also expected similar to NRCan’s comments on the Marten Falls and Webequie Road Projects.
NRCan-03	Northern Road Link Initial Project Description, 2023. Section 15.1.6.2 Field Studies, p.80.	Geochemistry	KBM resources indicates that samples collected as part of the field geotechnical investigation will be tested for acid rock drainage / metal leaching (ARD/ML).	The Impact Assessment should consider the geology of quarries, borrow sources, and rock cuts and the potential that the long-term weathering of this disturbed and exposed rock could be a source of contaminants to soil and nearby water bodies through ARD and/or ML processes following BC MOTI Technical Circular T-04/13.	NRCan recommends the proponent provide the proposed workplan that details the sampling and analytical methods to be used to evaluate ARD/ML. An appropriate workplan with details is expected similar to the Marten Falls and Webequie Road Projects.
NRCan-04	Northern Road Link Initial Project Description, 2023. Appendix F, Table F-1 Surface Water, pp.F-9 to F-10.	Geochemistry	Potential effects should include changes to surface water quality (construction and operations) related to ARD/ML potential.	The Impact Assessment should consider the potential for road construction material and exposed rock cuts to be a source of contaminants to nearby surface water bodies, in addition to impacts to soil already documented under “Geology, Terrain and Soils”.	NRCan recommends that Table F-1 be updated to include impacts to surface water in relation to ARD/ML.
NRCan-05	Northern Road Link Initial Project Description, 2023. Section 24.6.2 Preliminary Proposed Mitigation, p.152.	Forestry / Terrestrial Environment	Details of potential impacts of the Project on forest vegetation and biodiversity and details of proposed reclamation activities for forested lands impacted by the project are limited. Additional details are needed to assess potential impact(s) or effect(s) on valued components and potential need for any mitigation and/or monitoring measures, if applicable.	To build confidence in the management of potential effects, provide additional details in the Detailed Project Description and Response to the Summary of Issues on the following:	Effects on forested land / terrestrial environment from project activities.

Comment ID	Document Reference	Valued Component	Description of Key Issue (Context and Rationale)	Solutions for the Proponent	Summary of Issues
				<ul style="list-style-type: none"> Potential impacts on biodiversity, potential changes to soils (e.g. quality, loss, compaction, erosion) and species with cultural values; Impacts on forested land use change and mitigation measures to address these impacts; Proposed methods of tree clearing; Proposed reclamation activities, including timelines, for forested lands being affected by the Project. 	
NRCan-06	Northern Road Link Initial Project Description, 2023. Section 24.10 Plants and Vegetation Communities, p.157.	Forestry / Hydrology in forested areas	Details of potential impacts of the Project on hydrology of forested areas have not been provided. Additional clarification is needed to assess potential impact(s)/effect(s) on valued components and potential need for any mitigation and/or monitoring measures, if applicable.	<p>To build confidence in the management of potential effects, provide additional details in the Detailed Project Description and Response to the Summary of Issues on the following:</p> <ul style="list-style-type: none"> Potential impacts to hydrology in forested areas or surrounding watersheds and description of mitigation measures. 	Effects on hydrology in forested areas from project activities and mitigation measures.
NRCan-07	Northern Road Link Initial Project Description, 2023. Section 24.11 Species at Risk, p.159.	Forestry / Species at risk habitat	Details of how the Project could impact caribou habitat connectivity need to be further elaborated. Additional details are needed to assess potential impact(s) on connectivity and potential need for any mitigation and/or monitoring measures, if applicable.	<p>To build confidence in the management of potential effects, provide additional details in the Detailed Project Description and Response to the Summary of Issues on the following:</p> <ul style="list-style-type: none"> Potential impacts to caribou habitat connectivity as a result of the linear features of the Project. 	Effects on forested land / species at risk (including caribou habitat) from project activities and land-use changes.
NRCan-08	Northern Road Link Initial Project Description, 2023. Section 23.2 Socio-Economic Environment, p.142.	Economic conditions – baseline scenario	<p>A baseline (or base case) scenario, including current and projected economic activity, will be required in order to assess the effects of the Project on economic conditions (i.e. to estimate the incremental changes to economic conditions that would occur due to the Project).</p> <p>For example, this could include additional details regarding how this Project will enable economic development through linkages to proposed mining projects and deposits in the area.</p>	<p>A baseline scenario will require development of a projection of economic conditions, which will require making assumptions.</p> <p>Potential solutions for the proponent related to mineral exploration and mining projects may include:</p> <ul style="list-style-type: none"> Summarize all publicly available information about exploration projects, basing any projected activity on this information (such as only including final investment decisions, and discuss qualitatively the uncertainties around timelines, risks of moving mining projects into production, etc.), or Make assumptions about these projects, develop projections based on quantitative methodologies and describe the methodologies in detail. <p>These options, both applicable if an Impact Assessment is required, can help to build confidence in the Detailed Project Description.</p> <p>Consultation with stakeholders (e.g. community development committees) on assumptions regarding current and projected economic</p>	Development of a baseline scenario for the assessment of effects on economic conditions.

Comment ID	Document Reference	Valued Component	Description of Key Issue (Context and Rationale)	Solutions for the Proponent	Summary of Issues
				conditions in the local and regional economies could also help to build further confidence on the effects of the project.	