



CIAR File No.: 84331

July 21, 2023

Anjala Puvananathan
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 Comments on the Draft Permitting Plan and Draft Tailored Impact Statement Guidelines for the Northern Road Link Project

Dear Colleague,

On June 21, 2023, the Impact Assessment Agency of Canada (IAAC) requested that Natural Resources Canada (NRCan) provide specialist or expert information or knowledge to support development of the Tailored Impact Statement Guidelines (TISG) and the Permitting Plan for the Northern Road Link (the Project), as per paragraph 23(a) of the *Impact Assessment Act*.

Based on areas of our expertise, NRCan has made a few minor comments on the draft TISG and the Permitting Plan, which can be found in Attachment 1.

Should you have any questions, comments, or concerns, please contact me by email at Christina.Clarke@nrcan-rncan.gc.ca or by phone at 343-543-7619.

Sincerely,

Christina Clarke
Team Lead
Impact Assessment Division
Office of the Chief Scientist

cc: Peter Unger, Impact Assessment Division, Office of the Chief Scientist

Attachment 1: NRCan Comments on the Draft Permitting Plan and the Draft Tailored Impact Statement Guidelines for the Northern Road Link Project

Comment Form – Draft Permitting Plan and Draft Tailored Impact Statement Guidelines – Federal Review Team

Northern Road Link Project

Response required by: July 21, 2023

All comments should be submitted via the Submit a Comment feature available on the Project's Canadian Impact Assessment Registry page (<https://iaac-aeic.gc.ca/050/evaluations/proj/84331>). Documents can be uploaded using this feature. If you have any difficulties submitting this way, please contact the Registry directly at registry-registre@iaac-aeic.gc.ca. All comments submitted using this form will be posted on the Registry website for the Project.

Please note that this is your opportunity to customize the Tailored Impact Statement Guidelines. The Agency is required to issue the final Guidelines and plans no later than day 180 of the planning phase (August 20, 2023).

Department/Agency:	Natural Resources Canada		
IA Contact:	Christina Clarke	Telephone:	343-543-7619
		Email:	Christina.clarke@nrca-nrcan.gc.ca

Section 1 – Draft Permitting Plan:

1. Confirm that all applicable legislative and regulatory oversight that may apply to the Project, under the authority of your department or agency, is accurately listed in the draft Permitting Plan.

Insert response here:

The draft Permitting Plan accurately describes Natural Resources Canada's legislative and regulatory oversight that may apply to the Project with respect to the *Explosives Act*; however, there are couple minor errors to note:

1. Natural Resources Canada licenses only the manufacturing and storage of explosives. Heading 3.3 on page 3 should be changed to: Licence for explosives magazines under subsection 7(1) of the *Explosives Act*
2. Natural Resources Canada's role as a regulator involving issuing licences for both factories and magazines. Heading 4.3 on page 10 should be modified to: Licence for explosives factories and magazines under subsection 7(1) of the *Explosives Act*
3. The numbering in Section 4.3 is mislabeled (e.g., listed as 4.2.1 but should be 4.3.1).

2. Indicate whether your department or agency has identified any power that it will be unable to exercise to allow the Project to proceed, in whole or in part. For more information, please refer to subsection 17(1) of the IAA.

Insert response here:

Natural Resources Canada has not identified any power that it will be unable to exercise to allow the Project to proceed, in whole or in part.

Section 2 – Draft Tailored Impact Statement Guidelines:

1. Please review the draft Tailored Impact Statement Guidelines (the Guidelines) sections that are applicable to your department’s or agency’s mandate.
2. Using the table below, given the context of the Project, please provide any comments and include your recommendation for how the final Tailored Impact Statement Guidelines should be adapted to address any comments.
 - Please indicate any corrections, additions or deletions that should be made to the text. Please provide a clear context and rationale for your recommendations.
 - With a view to maximizing efficiency of assessment processes, the Guidelines should focus on key issues, effects and factors anticipated to be material and relevant to a public interest decision, and requirements should be clear and specific.

Department – Comment ID (e.g., ECCC-01)	Draft Guidelines Section	Context and Rationale (provide an explanation of your comments)	Recommendation: provide text to be inserted or deleted. Be specific on the location within the draft Guidelines that the text would be added/deleted.
NRCan-01	8.3.1	Modify bullet 5 on page 61, which is currently written for mining projects.	<p>NRCan recommends modifying bullet 5 on page 61:</p> <ul style="list-style-type: none"> • describe the representativeness of samples collected for acid rock drainage and metal(loid) leaching assessment. Provide a map that shows the sample locations and identification numbers. The map should also include the road alignment location, the approximate location of all aggregate pits, surficial geology, surface water bodies, and a scale and legend. Present cross-sections or block model images at an appropriate scale that include geology, mineralized zones, the approximate location of all aggregate pits, and borehole traces and identification numbers, and a scale and legend;
NRCan-02	8.3.1	<p>Modify bullet 6 on page 61, which is currently written for mining projects.</p> <p>Note that bullets 6 and 7 are similar. Suggest deleting bullet 7 and maintaining “For further guidance...” and its two sub-bullets under bullet 6.</p>	<p>NRCan recommends modifying bullet 6 on page 61:</p> <ul style="list-style-type: none"> • describe the approach and methods for the prediction of acid rock drainage and metal(loid) leaching, including identification of potential parameters of concern. For further guidance please use: <ul style="list-style-type: none"> ○ British Columbia Metal Leaching and Acid Rock Drainage - Province of British Columbia (gov.bc.ca)...

Department – Comment ID (e.g., ECCC-01)	Draft Guidelines Section	Context and Rationale (provide an explanation of your comments)	Recommendation: provide text to be inserted or deleted. Be specific on the location within the draft Guidelines that the text would be added/deleted.
			<ul style="list-style-type: none"> ○ MEND 1.20.1 Mend Prediction (mend-nedem.org)... <p>Provide initial leaching potential results based on short term leach tests and an analysis of the representativeness of laboratory and field kinetic tests based on static tests results;</p> <p>NRCan recommends deleting bullet 7:</p> <ul style="list-style-type: none"> ● describe the approach and methods for the prediction of metal(loid) leaching and acid rock drainage including oxidation of primary sulphides and secondary soluble sulphate minerals.
NRCan-03	8.4.1	Modify bullet 5 on page 62 to reference section 8.3.1 in relation to the acid generating potential of overburden, to avoid confusion that this is a separate study.	NRCan recommends modifying bullet 5 on page 62: <ul style="list-style-type: none"> ● describe the suitability of topsoil and overburden for use in the reclamation of disturbed areas including an assessment of the acid generating potential of overburden to be used (see Section 8.3.1);
NRCan-04	8.4. Topography, soil and sediment 8.4.1. Baseline conditions	Describe effects related to potential changes to soil quality and fertility, loss and compaction	NRCan recommends adding this bullet to Section 8.4.1: <ul style="list-style-type: none"> ● potential and likelihood of changes to soil quality and fertility, loss and compaction
NRCan-05	8.5. Riparian and wetland environments 8.5.1. Baseline conditions	<p>In the bullet, “identify and describe wetland capacities to perform hydrological and water quality functions, provide for wildlife and wildlife habitat or other ecological functions;” the focus is heavy on wetlands, with less on riparian vegetation and function. Suggest extending some of the wording around wetlands to also include riparian vegetation.</p> <p>In addition, specify carbon sequestration function under “other ecological functions”.</p>	NRCan recommends modifying bullet 5 on p.63: <ul style="list-style-type: none"> ● identify and describe wetland and riparian capacities to perform hydrological and water quality functions, provide for wildlife and wildlife habitat or other ecological functions, such as carbon sequestration;

Department – Comment ID (e.g., ECCC-01)	Draft Guidelines Section	Context and Rationale (provide an explanation of your comments)	Recommendation: provide text to be inserted or deleted. Be specific on the location within the draft Guidelines that the text would be added/deleted.
NRCan-06	8.7 Groundwater and surface water 8.7.2. Effects to groundwater and surface water	Section 8.7.2 seems to be missing a guideline about assessing potential vegetation and terrestrial changes on water quantity. There is mention of water quality response, but not water quantity.	NRCan recommends adding this bullet to Section 8.7.2: <ul style="list-style-type: none"> • Provide an assessment of potential changes to surface water quantity due to removal of vegetation and changes to riparian, wetland, and terrestrial environments.
NRCan-07	9.2.3	Modify bullet 3 on page 115 to reference critical minerals given their strategic importance to Canada's net-zero transition and economic security.	NRCan recommends modifying bullet 3: <ul style="list-style-type: none"> • provide a qualitative analysis and description of the extent to which the Project may facilitate developments, including mining projects, mineral exploration activities, critical minerals and other resource development in the area.