

ATTACHMENT: April 24, 2023

Federal Authority Advice Record

Response due by May 25, 2023

Aspen Power Station Project, Saskatchewan Power Corporation

Agency File: 84525

Department/Agency	Health Canada
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1. Is it probable that your department or agency may be required to exercise a power or perform a duty or function related to the Project to enable it to proceed?

[Not applicable](#)

If yes, specify the Act of Parliament and that power, duty or function.

1b. Please describe any Indigenous or public consultation that will be undertaken in relation to the exercise of that power, duty or function, including when it would take place.

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2. Is your department or agency in possession of specialist or expert information or knowledge that may be relevant to the conduct of an impact assessment of the Project?

Specify the specialist or expert information or knowledge.

[As a federal authority, Health Canada will provide specialist or expert information and knowledge in the Department's possession \(expertise\) to support the assessment of impacts on human health from projects considered individually or cumulatively under the *Impact Assessment Act* \(IAA\). It should also be noted that expertise related to assessing human health that is relevant to impact assessment \(IA\) may be held by other federal, provincial, and municipal partners, reflecting the shared jurisdiction for environmental and human health within Canada. For example, the Public Health Agency of Canada \(PHAC\) has expertise in the social determinants of health approach and health equity, and may provide that expertise through Health Canada, upon request from the reviewing body\(ies\). How the expertise provided by Health Canada and PHAC will be used in a potential IA process will ultimately be determined by the reviewing body\(ies\). Health Canada can](#)

provide human health expertise in the following areas:

- Air quality;
- Recreational and drinking water quality;
- Country foods;
- Noise;
- Methodological expertise in human health risk assessment;
- Methodological expertise in conducting health impact assessment;
- Electromagnetic fields;
- Radiological emissions; and,
- Public health emergency management of toxic exposure events.

Relevant Health Canada guidance documents:

Health Canada. 2016. Guidance for Evaluating Human Health Impacts in Environmental Assessment: Air Quality. Available online at: <https://www.publications.gc.ca/site/eng/9.802343/publication.html>

Health Canada. 2018. Guidance for Evaluating Human Health Impacts in Environmental Assessments: Country Foods. Available online at: <https://www.publications.gc.ca/site/eng/9.855584/publication.html>

Health Canada. 2016. Guidance for Evaluating Human Health Impacts in Environmental Assessment: Drinking and Recreational Water Quality. Available online at: <https://www.publications.gc.ca/site/eng/9.832511/publication.html>

Health Canada. 2019. Guidance for Evaluating Human Health Impacts in Environmental Assessment: Human Health Risk Assessment. Available online at: <https://www.publications.gc.ca/site/eng/9.870475/publication.html>

Health Canada. 2017. Guidance for Evaluating Human Health Impacts in Environmental Assessment: Noise. Available online at: <https://www.publications.gc.ca/site/eng/9.832514/publication.html>

Health Canada. 2017. Guidance for Evaluating Human Health Impacts in Environmental Assessment: Radiological Impacts. Available online at: <https://www.publications.gc.ca/site/eng/9.803614/publication.html>

Health Canada. 2018. Guidance for the Environmental Public Health Management of Crude Oil Incidents. Available online at: https://publications.gc.ca/collections/collection_2018/sc-hc/H129-82-2018-eng.pdf

Health Canada. 2022. Interim Guidance Document for the Health Impact Assessment of Designated Projects under the Impact Assessment Act. Draft for review. June 30, 2022. (Available upon request to: ia-ei@hc-sc.gc.ca)

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3. Has your department or agency considered the Project; 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.

[Not applicable](#)

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4. Has your department or agency had previous contact or involvement with the proponent or other party in relation to the Project? (for example: an enquiry about methodology, guidance, or data; introduction to the project)

Provide an overview of the information or advice exchanged.

[No](#)

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5. Does your department or agency have additional information or knowledge not specified, above, including information on the geographic, environmental, economic or social context of the project? (e.g., location of protected or sensitive areas, previous history between local communities and proponent or similar projects, local or regional social or economic concerns)?

Specify as appropriate.

[No](#)

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6. What are the key issues likely to be relevant to the public interest decision, based on the mandate and area(s) of expertise of your department, and which should be addressed in an impact assessment of the Project, should the Agency determine that one is required?

For each key issue:

- Describe the effect or the nature of the issue, including any relevant context;
- Provide the rationale and/or evidence for why it is a key issue;
- Identify briefly solutions to the issue, including any information or studies that should be required in the Tailored Impact Statement Guidelines, potential mitigation measures, and/or regulatory requirements relevant to the issue;
- Provide a concise, plain-language summary of the issue for inclusion in the Summary of Issues.

The information provided will be used by the Agency to determine if and an impact assessment is required and where appropriate to develop project-specific draft Tailored Impact Statement Guidelines that focus on the key issues likely to be relevant to the public interest decision.

Not applicable at this stage as there is insufficient information. Did not complete.
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7. Where possible, identify any clarifications or additional information the Proponent could include in the Detailed Project Description or in the response to the Summary of Issues that would:

- give confidence that an issue or effect could be addressed and managed;
- inform the decision as to whether an impact assessment is required; or
- aid in tailoring the Impact Statement Guidelines if an impact assessment is required.

These clarifications and additional information will be included as specific questions in the Summary of Issues provided to the proponent

Please see Table 2 for Health Canada responses
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[Health Canada](#)

Name of Departmental / Agency
Responder

[Regional Manager](#)

Title of Responder

[May 24, 2023](#)

Date

Table 1: Key Issues to inform decision-making (TISG)

The Agency asks that federal authorities align expert advice with the Agency’s approach to tailoring, which focuses on key issues or effects that are likely to be relevant to the public interest decision. In identifying key issues, federal authorities should be mindful of the Project’s context (size, scope, location), Indigenous knowledge and perspectives, and public concerns. Key issues that may be relevant to the public interest decision include:

- effects that may be significant, based on federal experts’ knowledge and experience with past projects;
- effects that may impact Indigenous peoples and their rights, based on Indigenous knowledge and perspectives or experience with past projects;
- effects on key species or habitats (e.g., at risk, important to Indigenous communities, commercial importance, provide important ecosystem function);
- issues or effects that may result from novel project activities, components or technology;
- effects with large uncertainties, including in the effectiveness of mitigation measures;
- transboundary effects where mitigation measures are limited;
- positive effects, including where project may support other governmental priorities, including reconciliation with Indigenous peoples; and
- key concerns raised by Indigenous or local communities.

Effects that are anticipated to be minor or which can be managed using well understood mitigation measures, existing guidance, and/or other regulatory processes may have simplified information requirements or may be removed entirely. Measured advice from federal authorities on key issues and solutions —and on the scope and detail of any required information and studies — will enable the Agency to focus assessments on issues that are important to participants and to decision-makers.

Comment ID	Valued Component or Factor to Consider	Description of Key Issue (Context and Rationale)	Solutions for the Proponent	Plain language summary for inclusion in Summary of Issues
<p><i>Please identify comments by organization and comment number.</i> <i>e.g.: IAAC-01</i></p>	<p><i>Identify valued component(s) or factor to consider—within the mandate of your department or agency—to which the effect or issue applies.</i></p>	<p><i>Provide a brief description of the issue and rationale for being a key issue.</i></p> <p><i>Include, where relevant,:</i></p> <ul style="list-style-type: none"> • <i>the pathway of effects;</i> • <i>social, economic or environmental context which are relevant to it being a key issue;</i> • <i>key uncertainties that should be addressed in the impact assessment;</i> • <i>Indigenous or public concerns or perspective;</i> • <i>potential for differential effects among diverse subgroups;</i> • <i>scientific evidence or traditional knowledge, including from past project experience, which supports inclusion as a key issue.</i> 	<p><i>Where applicable, briefly identify solutions to address the potential issue or effects including</i></p> <ul style="list-style-type: none"> • <i>Information or studies required to describe and characterize the effect, should an impact assessment be required; including any guidance for data collection and/or analysis or existing data sources to inform the assessment;</i> • <i>Any powers, duties or functions that your department or agency has that may mitigate, manage, or set conditions related to the effect;</i> • <i>Guidance or policies for mitigating effects or any standard and well-understood mitigation measures that would address the effect, including follow-up monitoring activities; and/or</i> • <i>Commitments the proponent could make to respond to the issue.</i> <p><i>Where available, please refer to existing text in the TISG template.</i></p>	<p><i>For issues to be included in the Summary of Issues, provide a concise, plain language synopsis of the key issue and any questions or directions for the proponent.</i></p>

Please insert additional rows as necessary.

Table 2. Clarifications or additional information the Proponent could include in the Detailed Project Description or in the response to Summary of Issues

Comment ID	Document Reference - Relevant section of the Initial Project Description (IPD)	Valued Component or Factor to Consider	Project Component	Description of Issue, Concern or Uncertainty	Clarification or additional information	Plain language summary for inclusion in Summary of Issues
<p>Please identify comments by organization and comment number. e.g.: IAAC-01</p>	<p>If the comment is related to a specific section of the Initial Project Description, please provide a reference. You may also choose to copy the relevant text here.</p>	<p>Identify valued component(s) or factor to consider—within the mandate of your department or agency—to which the effect or issue applies.</p>	<p>If applicable, please indicate the project component or activity that could cause the described effect. If the effect is linked to a power, dut, or function, please identify the project component or activity that would be regulated, monitored, or enabled by the power, duty or function.</p>	<p>Provide a description of the issue, concern or uncertainty the proponent could address in their detailed project description that would give confidence that the issue will be addressed and managed, or which could aid in tailoring the Guidelines</p>	<p>Provide recommended clarification or additional information to be included in the Detailed Project Description to address the issue, concern or uncertainty, for example</p> <ul style="list-style-type: none"> • Clarifications to project description (e.g., components, activities, locations or alternatives); • Project design changes that could avoid effects; • Evidence that could be presented to demonstrate there is no effect pathway or that effects will be negligible; • Evidence that standard mitigations will address potential effects; • Commitments the proponent could make to respond to the issue, including the implementation of federal operational policies or guidance documents. 	<p>For issues to be included in the Summary of Issues, provide a concise, plain language synopsis of the issue and of the question or direction for the proponent.</p>
<p>HC-01</p>	<p>Section 4 (Indigenous Engagement Summary) p.4.1 Section 19.1.1 (Overview of Environmental Effects and Pathways, Air quality) p. 19.1-19.2 Section 22 (Indigenous People of Canada Potential Impacts) p. 2-12 Section 14.2.1.2 (incidental Activity Study Area) p.14.4-14.5 Appendix E, Section 2.5 (CAAQS Refined Modelling Results) p.2-12 to 2-13 Appendix E, Section 2.6 (Conclusion), p. 2-14 Sections 24.4 (Mobile Combustion Emissions Generated During Construction) p. 24.9-24.12 Sections 24.6 (Stationary Combustion Emissions Generated During Operation and Maintenance) p.24.12-24.15</p>	<p>Human Health – Air Quality</p>	<p>All phases</p>	<p>There is no discussion on the potential for health effects from short-term increases of contaminants in ambient air quality, especially for sensitive receptors in the Initial Project Description (IPD).</p> <p>Section 22 concludes that the impacts to Indigenous People’s health are not expected because the air dispersion modelling conducted for the Project shows that the maximum predicted concentrations of the substances of interest are below the relevant regulatory objectives (Saskatchewan Ambient Air Quality Standards or SAAQS and Canadian Ambient Air Quality Standards or CAAQS) for all averaging periods. The Project site is located within Treaty 6 territory and the Metis Nation of Saskatchewan territory; and there are several Treaty 4 First Nations within 100 km of the Project site.</p> <p>There were 7 residence receptors noted within 2 km of the Project (Section 2.5, Table 2-10). Other sensitive receptors and traditional land use activities by Indigenous communities were not described.</p> <p>In Section 14.2.1.2 and Appendix E, the Proponent refers to background concentrations of air quality data from a series of SK ENV air quality monitoring stations that they report as representative of the Project location. However, the locations of the monitoring stations (i.e., map) relative to the Project were not provided.</p> <p>Sections 19 and 24 and Appendix E describe the anticipated air contaminants and their sources during construction, operations, and maintenance phases.</p> <ul style="list-style-type: none"> • Construction: oxides of nitrogen (NO_x) + non-methane hydrocarbons (NMHC), sulphur dioxide (SO₂), carbon oxides (CO_x), particulate matter (TPM/PM₁₀/PM_{2.5}), carbon dioxide (CO₂), methane (CH₄), nitrous oxides (N₂O), carbon dioxide equivalent (CO₂e) from construction equipment and personal vehicle use 	<p>Health Canada recommends that the Proponent:</p> <ol style="list-style-type: none"> 1) Provide the location of sensitive receptors (e.g., hospitals, schools, retirement complexes or assisted care homes) and traditional land use activities by Indigenous communities (e.g., hunting, fishing, trapping, gathering of plants or medicines, ceremonial, or spiritual practices, passing on of Indigenous knowledge and/or language) when identifying potential Project-related air quality impacts on human health. 2) Provide a complete inventory of all potential air pollutants including, but not limited to, NO_x, SO₂, CO, ozone (O₃), PM_{2.5}, coarse particulate matter (PM₁₀), PAHs, VOCs, DPM, and metals. Justify the exclusion of any common air pollutants from further consideration. <p>Refer to HC-07 for a link to HC’s Guidance for Evaluating Human Health Impacts in Environmental Assessment: Air Quality, which provides further detail on the type of information Health Canada looks for when reviewing documents submitted by project proponents as part of the impact assessment process.</p>	<p>Air quality information is needed specifying the location of facilities with vulnerable populations.</p> <p>Air quality information is needed specifying Indigenous uses of the Land.</p> <p>Air quality information is needed about emissions and dispersion of air contaminants from project activities.</p> <p>The inventory of potential air pollutants are incomplete.</p> <p>An exclusion list of air pollutants and justifications for exclusion is absent.</p> <p>Diesel emissions should be included during the construction and operation phases.</p> <p>A justification to support the proponent’s conclusions about the maintenance of ambient air quality is missing.</p>

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	<p>Section 19.2.1 (Construction Mitigation Measures, Air Quality) p. 19.11</p> <p>Section 19.3.1 (Operation and Maintenance Mitigation Measures, Air Quality) p. 19.6</p> <p>Section 23.3 (Mitigation and Monitoring Measures) p.23.4-23.6</p> <p>Section 19.9 (Summary of Effects), p.19.24-19.25</p>			<ul style="list-style-type: none"> Operations: NOx, CO, TPM/PM₁₀/PM_{2.5}, and SO₂ from the F-Class natural gas combustion turbine, natural gas-fired dew point heater, emergency diesel fire pump and emergency diesel generator. <p>However, the air contaminant emissions inventory does not include diesel exhaust (DE) emissions from operation of heavy equipment and diesel generators during the construction and operation phases. DE is a complex mixture of gaseous and particulate compounds, including diesel particulate matter (DPM), polycyclic aromatic hydrocarbons (PAHs), and volatile organic carbons (VOCs), and considered a highly toxic air contaminant associated with cancer and adverse health problems such as respiratory illnesses and increased risk of heart disease.</p> <p>Because the information provided does not include diesel exhaust emissions, HC cannot fully characterize the potential risks to human health.</p> <p>The proposed mitigation approaches in Section 19.2.1, 19.3.1, and 23.3 appear to include standard/known approaches for air quality effects. HC encourages the use of all available mitigation measures that are technically and economically feasible to limit negative impacts to air quality [e.g., Cheminfo (2005) Best Practices for the Reduction of Air Emissions from Construction and Demolition Activities. Available online at: http://www.bv.transports.gouv.qc.ca/mono/1173259.pdf]</p> <p>There is no discussion on predicted residual effects on air quality from Project construction, operations, and maintenance. However, Section 19.9 states the Project is not expected to cause or contribute to a substantial degradation of ambient air (negligible effects). Although standard mitigation measures are provided, rationale is not provided to justify the assumption that there will not be a substantial degradation to ambient air quality.</p>		
HC-02	<p>Section 13.4.1 (Proximity to any Permanent, Seasonal or Temporary Residences) p.13.2</p> <p>Section 19.2.2 (Construction Mitigation Measures, Noise) p. 19.11-19.12</p> <p>Section 19.1.2 (Noise), p.19.2-19.3</p>	Human Health – Noise Mitigation Measures	All phases	<p>Project construction will generate noise levels that have the potential to be periodically audible offsite (Section 19.2.2). The sound levels for the existing conditions were estimated (Appendix E). The IPD states that there is one existing energy-related facility (within 3000 m) and an existing substation (1700 m west) of the Project. The noise impact assessment (NIA) results indicate that cumulative sound levels (logarithmic sum of Project emitted noise, existing energy-related facility noises, and ambient sound level), are expected to be at or below the permissible sound level (PS)L at all seven residential dwelling receptors.</p> <p>During operations, the major noise emitting equipment in the combined-cycle power plant consists of generators and a condenser</p>	<p>Health Canada recommends that the Proponent:</p> <ol style="list-style-type: none"> 1) Provide detailed information (e.g., location and duration of monitoring, baseline noise levels, location of sensitive receptors, etc.) from the ambient noise surveys. 2) Consider the location of sensitive receptors (e.g., hospitals, schools, retirement complexes or assisted care homes) and traditional land use activities by Indigenous communities (e.g., hunting, fishing, trapping, gathering of plants or medicines, ceremonial, or spiritual practices, passing 	<p>Additional details are needed from ambient noise surveys.</p> <p>Information is needed on noise effects for facilities with vulnerable populations.</p> <p>Information is needed on noise effects from Indigenous uses of the Land.</p>

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	<p>Appendix F (Noise Impact Assessment)</p> <p>Section 19.1.6.1 (Human Environment, Change in Current Land and Resource Use) p. 19.9</p> <p>Section 19.3.2 (Operation and Maintenance Mitigation Measures, Noise) p. 19.16</p> <p>Section 19.2.2 (Noise) p. 19-11-19.12</p>			<p>(Section 19.1.2). The IPD states that the Project noise effect was quantified for construction and operations phases using the seven nearest residential dwelling receptors within 1500 m of the Project boundary (local assessment area or LAA) (Appendix F, p.3-2). The cumulative noise levels are expected to be at or below the PSL as per the Alberta Utilities Commission at all seven residential dwelling receptors. Ambient sound level data was not collected, and sound levels were assumed for the modelling. Additionally, discussion on the effects of operation noise qualified based on past experience with no quantifiable predictions provided.</p> <p>Base on the information provided, HC cannot characterize the potential risks to human health.</p> <p>The mitigation measures listed appear to be known/standard for noise effects. In the absence of an assessment of human health impacts of noise, HC cannot comment on the sufficiency of the proposed noise mitigation measures, or whether additional measures (e.g., physical sound barriers) may be required. There was no mention of a noise complaint response procedure. The Noise Impact Assessment (Appendix F) states that the cumulative sound levels are expected to be at or below the PSLs at all nearby dwellings, and low frequency noise is not expected to be an issue.</p>	<p>on of Indigenous knowledge and/or language, etc.) when identifying potential Project-related noise impacts on human health.</p> <ol style="list-style-type: none"> 3) Provide the timing of construction activities. 4) Provide noise levels for an existing conditions scenario. 5) Provide predicted noise levels from both the construction and operations phases. 6) Identify any applicable noise adjustments (e.g., community type, time-of-day, tonal and/or impulsive noise, etc.) that will be considered in the noise assessment. 7) Provide details on the planned complaints resolution process that describes how complaints will be received (e.g., website, telephone number), response time, and method(s) for resolution, including additional mitigation measures if required. 8) Consider or recommend a follow-up monitoring plan to confirm the effectiveness of mitigation measures. <p>Refer to HC-07 for a link to HC's Guidance for Evaluating Human Impacts in Environmental Assessment: Noise, which provides further detail on the type of information Health Canada looks for when reviewing documents submitted by project proponents as part of the impact assessment process.</p>	<p>Additional details are needed about the timing of construction activities.</p> <p>Additional information is needed on predictions of noise levels during construction and operation phases.</p> <p>Additional information is needed on adaptations to activities to mitigate noise effects.</p> <p>Information is needed on noise complaints procedures.</p> <p>Information is needed on noise attenuation plans.</p>
HC-03	<p>No mention of drinking water or recreational water use</p> <p>Section 21.1 (Potential Environmental Impacts to Indigenous People of Canada) p. 21.1</p>	Human Health – Water Quality	All phases	<p>Surface and groundwater that may be used for drinking water, recreation, and traditional purposes were not identified. There was no discussion on the potential impacts to water quality from the Project. Also, air deposition onto local surface water bodies is not considered. Based on the information provided, HC cannot characterize the potential risks to human health. Section 21.1 states that the Project is located within Treaty 6 and the Metis Nation of Saskatchewan territory and is near Treaty 4 territory.</p> <p>The proponent has not articulated mitigation measures for surface or groundwater quality as they relate to water used for drinking, recreation or traditional purposes.. HC is unable to comment on the effectiveness of the planned mitigation measures.</p> <p>The proponent did not assess the potential residual effects for human health related to changes in the quality of water used for drinking recreation and traditional purposes.</p>	<p>HC recommends that the Proponent:</p> <ol style="list-style-type: none"> 1) Identify all water sources that are used for drinking, recreational, and traditional purposes, such as potable water wells, municipal drinking water supplies and treatment systems, and the location of water bodies used for recreation and traditional purposes as part of a baseline water quality study. Clarify whether Indigenous users consume treated or untreated water. 2) Describe any potential Project-related changes to drinking water and water used for recreation and traditional purposes and associated effects on human health. <p>Refer to HC-07 for a link to HC's Guidance for Evaluating Human Impacts in Environmental</p>	<p>Information is needed on water sources affected by the project.</p> <p>Information is needed on how Indigenous population consume water.</p> <p>Information is needed on potential surface water and groundwater quality changes from the project and effects on human health.</p> <p>Information is needed on plans to attenuate water contamination.</p>

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					Assessment: Drinking and Recreational Water Quality, which provides further detail on the type of information HC looks for when reviewing documents submitted by project proponents as part of the impact assessment process.	
HC-04	<p>No mention of consumption of country foods</p> <p>Section 4.3.1 (Results of Indigenous Engagement to Date, Key Issues Raised) p. 4.8</p> <p>Section 21.1 (Potential Environmental Impacts to Indigenous People of Canada) p. 21.1</p>	Human Health – Country Foods	All phases	<p>There is no discussion on the potential uptake of contaminants in country foods from Project-related changes in air, water and/or soil quality.</p> <p>Section 4.3.1 states that, so far, no issues have been raised by Indigenous groups regarding the Project. It was indicated that “In SaskPower’s experience, Indigenous groups are often preoccupied with their own unique community interests, and some may be experiencing engagement and consultation fatigue or face capacity challenges which limit their ability to actively participate in project engagement. Engagement with Indigenous groups is ongoing, and SaskPower will continue to reach out and be available for discussion.”</p> <p>Based on the information provided, and given the uncertainty raised in the previous comments on Project effects on ambient air quality and water quality, HC cannot characterize the potential risks to human health from consumption of contaminated country foods.</p>	<p>HC recommends that the Proponent:</p> <ol style="list-style-type: none"> 1) Identify country food consumption as a potential pathway of contaminant exposure for traditional land users. Identify potential country food types/species (e.g., plants, fish, birds, and wildlife) that may be harvested from the area. Relevant information may be collected from Indigenous engagement activities and/or dietary/consumption surveys. 2) Identify all contaminants of potential concern (COPCs) from Project-associated emissions and potential transport pathways of the COPCs into country foods (e.g., aquatic food web accumulation, atmospheric deposition). 3) Provide any available information on background concentrations of Project-related COPCs in country foods and discuss whether concentrations may increase as a result of the Project. Discuss the human health impacts associated with these potential Project-related changes to country foods quality. <p>Refer to HC-07 for a link to HC’s Guidance for Evaluating Human Impacts in Environmental Assessment: Country Food, which provides further detail on the type of information Health Canada looks for when reviewing documents submitted by project proponents as part of the impact assessment process.</p>	<p>information is needed about country foods use by Indigenous populations.</p> <p>Information is needed about existing contamination in country foods and any possible increase of contamination, and projected effects on human health.</p>
HC-05	<p>Section 13.1.2 (Geographic Coordinates of Incidental Activities, Table 13-1), p.13.1</p> <p>Transmission line – multiple locations</p> <p>Section 19.5.1 (Hazardous Materials Spills), p.19.19</p>	Human Health – Accidents and Malfunctions	All phases	Potential impacts on human health from accidents and malfunctions (such as spills/releases) should be included to fully assess potential project effects. The Proponent stated that the Project is not expected to affect the health, well-being, and social conditions of Indigenous Peoples of Canada. Also, the IPD states that engagement and consultation activities to date have been inclusive of women+ and diverse groups. However, no detail on potential accidents and malfunctions (e.g., effluent spills from pipes) and the likelihood and severity of these accidents and malfunctions and the associated effects	<p>Health Canada recommends that the Proponent:</p> <ol style="list-style-type: none"> 1) Include a quantitative or qualitative discussion on potential accidents and malfunctions including their likelihood and severity and the associated effects on environmental, social, and economic conditions. If a qualitative discussion is presented, include proposed risk management/mitigation measures. Health 	More information is needed on potential accident and malfunction scenarios that could lead to the release of contaminants into the surrounding environment for each phase of the Project, and their potential effects on human health.

Comment ID	Document Reference - Relevant section of the Initial Project Description (IPD)	Valued Component or Factor to Consider	Project Component	Description of Issue, Concern or Uncertainty	Clarification or additional information	Plain language summary for inclusion in Summary of Issues
	<p>Section 22.1 (Health and Social Changes to Indigenous Peoples of Canada) p. 22.1-22.2</p> <p>Section 24.2.2 (Accidents and Malfunctions) p. 24.9</p>			<p>on environmental, social, and economic conditions, as they relate to health, has not yet been provided.</p> <p>The construction of a new 230 kV overhead transmission line and a new overhead 25 kV distribution line are mentioned in the IPD in various places. If concerns around EMFs from transmission lines are raised, Health Canada can provide guidance on EMF measurements with respect to potential impacts on human health.</p>	<p>Canada's guidance¹ on responding to crude oil incidents may be useful to inform emergency response planning, if it is determined that an IA be required.</p> <p>Refer to HC-07 for a link to HC's Guidance for the Environmental Public Health Management of Crude Oil Incidents: A guide Intended for Public Health and Emergency Management Practitioners, which provides further detail on the type of information Health Canada looks for when reviewing documents submitted by project proponents as part of the impact assessment process.</p>	<p>Information is needed for on human health effects of environmental releases of contaminants in the event of accidents or malfunctions.</p>
HC-06	<p>Section 3 (Public Engagement Summary) p.3.1</p> <p>Section 4 (Indigenous Engagement Summary) p.4.1</p> <p>Section 15 (Regional Health, Social and Economic Description) p.15.1-15.6</p> <p>Section 15.4 (Health, Social or Economic Derived from Engagement) p. 15.6</p> <p>Appendix A (Stakeholder Engagement)</p> <p>Section 22 (Health, Social or Economic Changes to Indigenous Peoples of Canada) p. 22.1 to 22.2</p>	Human Health – Health, Social and Economic Context (Human Impact Assessment (HIA))	All phases	<p>There is no mention of a HIA commitment by the Proponent during the Impact Statement phase (should an IA be required). The IPD does not articulate potential health, social and economic effects in sufficient detail; therefore, it is not possible to determine the possible effects of the Project on the social determinants of health and health equity.</p> <p>In addition to the uncertainties raised in previous comments on Project-related effects on the environment, no linkages or effect pathways were described between the Project's changes to economic, social, and ecological conditions and health. An assessment of these linkages and effect pathways could be completed if an HIA were to be conducted.</p> <p>The purpose of an HIA is to explore how the potential adverse and positive project-related effects on environmental, economic, social, and cultural conditions may then influence health conditions (e.g., behavioural and biological factors).</p> <p>The draft IPD does not explain the possible impact of this Project on workers needs for housing and service demands and possible mitigation measures to address this issue.</p> <p>Given the limited scope of the health, social and economic information in the IPD, there is insufficient justification provided to conclude that resulting effects on human health are not significant.</p> <p>The proponent does not explicitly provide an effects pathway that links social determinants of health to potential health outcomes.</p> <p>The proponent has not included residual effects for health and wellbeing in the IPD.</p>	<p>HC recommends that the Proponent:</p> <ol style="list-style-type: none"> 1) Provide a description of how health effects considered the linkages and effect pathways between project impacts on the economic, social, and ecological conditions were considered. 2) Provide detail on potential effects on the host community resulting from workforce recruitment practices, including housing pressures and increased service demands. <p>Refer to HC-07 for a link to HC's Interim Guidance Document for the Health Impact Assessment of Designated Projects under the Impact Assessment Act. Draft for review. June 30, 2022. (Available upon request to: ia-ei@hc-sc.gc.ca) which provides further detail on the type of information Health Canada looks for when reviewing documents submitted by project proponents as part of the impact assessment process.</p>	<p>If the project is subject to an Impact Assessment, information is needed on economic, social, and ecological effects.</p> <p>More detailed information is needed about employment opportunities effects on communities.</p>

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HC-07	IPD	Human Health - General	Construction and Operation Phases	HC has published a series of Guidance Documents that provide general guidance on assessing risks to human health from major resource and infrastructure projects in Canada. It presents the principles, current practices, and basic information HC looks for when it reviews the environmental impact statement or other reports submitted by Project proponents. These Guidance Documents were prepared for the benefit of proponents and their consultants and to support an efficient and transparent project review process. References to these Guidance Documents can be included in the final IPD, Detailed Project Description (DPD) or addressed through the Tailored Impact Statement Guidelines (TISG).	<p>HC recommends assessment of the potential health impacts include the department's guidance documents for Evaluating Human Health Impacts in Environmental Assessment:</p> <ol style="list-style-type: none"> 1. Guidance for Evaluating Human Health Impacts in Environmental Assessment: Air Quality² 2. Guidance for Evaluating Human Health Impacts in Environmental Assessments: Country Foods³ 3. Guidance for Evaluating Human Health Impacts in Environmental Assessment: Drinking and Recreational Water Quality⁴ 4. Guidance for Evaluating Human Health Impacts in Environmental Assessment: Human Health Risk Assessment⁵ 5. Guidance for Evaluating Human Health Impacts in Environmental Assessment: Noise⁶ 6. Guidance for Evaluating Human Health Impacts in Environmental Assessment: Radiological Impacts⁷ 7. Guidance for the Environmental Public Health Management of Crude Oil Incidents⁸ 8. Interim Guidance Document for the Health Impact Assessment of Designated Projects under the Impact Assessment Act. Draft for review. June 30, 2022. (Available upon request to: ia-ei@hc-sc.gc.ca ⁹) 	Recommended guidance documents for the proponent to consider assessing the health effects of the Project.

Please insert additional rows as necessary.

² Health Canada. 2016. Guidance for Evaluating Human Health Impacts in Environmental Assessment: Air Quality. Available online at: <https://www.publications.gc.ca/site/eng/9.802343/publication.html>
³ Health Canada. 2018. Guidance for Evaluating Human Health Impacts in Environmental Assessments: Country Foods. Available online at: <https://www.publications.gc.ca/site/eng/9.855584/publication.html>
⁴ Health Canada. 2016. Guidance for Evaluating Human Health Impacts in Environmental Assessment: Drinking and Recreational Water Quality. Available online at: <https://www.publications.gc.ca/site/eng/9.832511/publication.html>
⁵ Health Canada. 2019. Guidance for Evaluating Human Health Impacts in Environmental Assessment: Human Health Risk Assessment. Available online at: <https://www.publications.gc.ca/site/eng/9.870475/publication.html>
⁶ Health Canada. 2017. Guidance for Evaluating Human Health Impacts in Environmental Assessment: Noise. Available online at: <https://www.publications.gc.ca/site/eng/9.832514/publication.html>
⁷ Health Canada. 2017. Guidance for Evaluating Human Health Impacts in Environmental Assessment: Radiological Impacts. Available online at: <https://www.publications.gc.ca/site/eng/9.803614/publication.html>
⁸ Health Canada. 2018. Guidance for the Environmental Public Health Management of Crude Oil Incidents. Available online at: https://publications.gc.ca/collections/collection_2018/sc-hc/H129-82-2018-eng.pdf
⁹ Health Canada. 2022. Interim Guidance Document for the Health Impact Assessment of Designated Projects under the Impact Assessment Act. Draft for review. June 30, 2022. (Available upon request to: ia-ei@hc-sc.gc.ca ⁹)