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December 20, 2023

CIAR: [86128](#)

Leslie Kieley
Project Manager, Atlantic Region
Impact Assessment Agency of Canada
CooperCove@iaac-aeic.gc.ca

SENT BY EMAIL

Subject: Natural Resources Canada's Review of Initial Project Description for Cooper Cove Marine Terminal Expansion Project

Dear Leslie

On December 6, 2023, the Impact Assessment Agency of Canada (IAAC) requested that Natural Resources Canada (NRCan) review the Initial Project Description (IPD) for the Cooper Cove Marine Terminal Expansion Project.

NRCan has reviewed the documents in relation to its mandate and expertise in marine geoscience and explosives. NRCan offers the attached comments in the Federal Authority Advice Record, resulting from our review of the IPD.

Should you have any questions, comments or concerns, please contact me by email at Natalie.robinson@nrcan-rncan.gc.ca or by phone at 403-483-4587.

Sincerely,

Natalie Robinson,
Senior Impact Assessment Officer
Impact Assessment Division
Office of the Chief Scientist.

cc: Christina Clarke, Impact Assessment Division

Attachment: Federal Authority Advice Record

Canada 

Federal Authority Advice Record (FAAR)**The FAAR must be submitted to the Registry by December 20, 2023.**

Cooper Cove Marine Terminal Expansion Project – Port of Argentina

Registry reference no.: 86128

Department/Agency	Natural Resources Canada
Lead contact	Natalie Robinson
Full address	580 Booth Street, Ottawa, ON
Email	Natalie.Robinson@nrca-nrcan.gc.ca
Telephone	1-403-483-4587
Alternate Contact	Christina Clarke Christina.Clarke@nrca-nrcan.gc.ca Cell: 343-543-7619

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1. a) 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?

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

b) 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.

Based on the information provided in the Initial Project Description, it is not expected that Natural Resources Canada (NRCan) will be required to issue an authorization under the *Explosives Act*.

However, should the project require the storage of explosives on the site, NRCan may be required to issue an authorization for explosives magazines as per the *Explosives Act* and regulations. Should an application be submitted, NRCan's Explosives Regulatory Division may undertake Indigenous or public consultation.

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

Specify the specialist or expert information or knowledge.

Based on its diverse scientific research programs, NRCan possesses the following expertise that may be relevant to the conduct of an impact assessment for this project:

- Seismicity: Seismic hazard analysis, codes and standards, mitigation measures
- Marine geoscience

NRCan may further revise its areas of expertise related to the Project's impact assessment as more information becomes available during the subsequent phases of the review process.

3. Has your department or agency 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?

Please specify if applicable.

NRCan has not taken any course of action, or exercised a power or performed a duty or function that would allow the Project to proceed.

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)?

Please provide an overview of the information or advice exchanged.

NRCan has not had previous contact or involvement with the proponent or other party in relation to the Project.

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

Please specify if applicable.

Based on the information available, NRCan does not have additional information or knowledge about the project.

6. From the standpoint of your department's mandate and expertise, what are the main issues concerning the project?

For each key issue, please:

- 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;
- briefly provide solutions to the issue, including information or studies that, if applicable, should be requested to the proponent in the Tailored Impact Statement Guidelines, potential mitigation measures, or regulatory requirements relevant to the issues;
- provide a concise, plain-language summary of the issue for inclusion in the Summary of Issues.

The information provided will be taken into consideration by the Agency to formulate an opinion on whether an impact assessment is required and, if applicable, will be taken into account in developing project-specific Tailored Impact Statement Guidelines in the next steps of the impact assessment process.

Please use Table 1 to answer this question.

NRCan Responses provided below in Table 1.

7. If applicable, specify any additional information the proponent could provide in the Detailed Project Description or in its response to the Summary of Issues that:
- would make it possible to verify whether certain minor issues could be addressed and managed by clear measures, existing guidelines, other regulatory processes or other existing tools;
 - help the Agency to provide an opinion if an impact assessment is required, or
 - would support the tailoring of the Impact Statement Guidelines if the Agency is of the opinion that an impact assessment is required.

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

Please use Table 2 to answer this question.

[NRCan has not identified any additional information that the proponent could provide in the Detailed Project Description or in the response to the Summary of Issues.](#)

Natural Resources Canada – NRCan Impact Assessment Division

Name of department or agency involved

Impact Assessment Officer – Natalie Robinson

Speaker title

December 20, 2023

Date

Table 1: Key issues to inform the impact assessment process

The Agency asks that federal authorities guide expert advice on the Agency's approach to project specific tailoring, if the Agency is in the opinion that an impact assessment is required. This approach aims to focus the assessment on the Project's key issues, with an emphasis on the prevention of adverse environmental effects in areas of federal jurisdiction. In determining key issues, federal authorities should be mindful of the Project's context (size, scope, location), Indigenous knowledge and perspectives, and public concerns.

Potential effects that are considered minor, or that can be mitigated through clear measures, existing guidance or other regulatory processes, may be subject to simplified information requests or be disregarded. Advice from federal authorities on key issues and solutions - and on the scope and detail of the studies and information requested - will enable the Agency to focus the analysis on those issues that are important for the impact assessment process.

Comment ID	Relevant section of the initial project description	Valued Component or Factor to Consider	Description of key issue (context and rationale)	Advice	Plain-language summary for inclusion in Summary of Issues
<p>Please present comments by organization and comment number</p> <p>e.g.: IAAC-01</p>	<p>If the comment relates to a specific section of the initial project description, please provide the reference.</p>	<p>Identify valued component(s) or factor to consider—within the mandate of your department or agency—to which the potential effect or issue applies.</p>	<p>Please provide a brief description of the issue and rationale for being a key issue.</p> <p>Include, where relevant:</p> <ul style="list-style-type: none"> the sequence of potential effects; the relevant context that specifies why this is a key issue; key uncertainties that should be addressed in the impact assessment; Indigenous or public concerns or perspective; scientific data or traditional knowledge, including from previous projects, that justifies the inclusion of the key issue in the project assessment. 	<p>If applicable, please provide brief solutions/advice to address the issue or potential effect, including:</p> <ul style="list-style-type: none"> studies or information relevant to describing and characterizing the potential effect, including any guidance for data collection or analysis or existing data sources to inform the assessment; any powers your department or agency has that may mitigate, manage or set conditions related to the issue; advice or policies to frame and mitigate the potential effect; standardized mitigation or monitoring measures that could manage potential effects, including follow-up on monitoring activities; Commitments the proponent could make to respond to the issue. 	<p>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, if applicable.</p>
NRCan-01	IPD Nov 29, 2023– Part C Section 4.7.3, Appendix F Cooper Cove Infill Feasibility Study (2019) Section 5.1.1.5	Environment	Low lying marine terminals are affected by, and affect, local sedimentation patterns and subsea geological processes. Other than samples collected in the area that will host the future terminal infrastructure, no consideration of the marine geology of the surrounding embayment has been considered. Previous work and existing, publicly available data suggest that anthropogenic alteration of the immediately adjacent seabed, sediment transport southward into the deep basin of the Port of Argentia, and evidence of a subsea	<p>We recommend the proponent review the following example reports:</p> <p>https://doi.org/10.4095/326514</p> <p>https://doi.org/10.4095/293728</p> <p>Along with the following mapping data:</p> <p>https://data.chs-shc.ca/dashboard/map</p> <p>and subsurface data:</p>	

			landslide occurring off the coastline opposite the proposed terminal location are all relevant marine geological factors worth considering.	https://ed.marine-geo.canada.ca/ We recommend that the following information be provided to support our review: <ul style="list-style-type: none"> i) an assessment of the stability of the anthropogenically altered seabed, ii) an assessment of the potential for the alteration of submarine sedimentological processes in the bay (an expanded assessment to that which was provided in the Shoreline Impact Assessment of Appendix F), and iii) a description of the approach taken to manage the risk of underwater landslides occurring naturally, or being triggered in construction and/or operations activities. 	

Please insert additional lines if necessary.

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

Comment ID	Relevant section of the Initial Project Description	Description of the Issue, Concern or Uncertainty	Clarifications or additional information	Plain-language summary for inclusion in Summary of Issues
<p><i>Please identify comments by organization and comment number.</i></p> <p><i>e.g. AEIC-01</i></p>	<p><i>If the comment is related to a specific section of the Initial Project Description, please provide a reference.</i></p> <p><i>You may also choose to copy the relevant text here.</i></p>	<p><i>Provide a description of the issue, concern or uncertainty that the proponent could include in its Detailed Project Description, which could be framed and managed by clear measures, existing guidelines, regulatory processes or other existing tools, and thus be the subject of a simplified information request in the guidelines, or simply be disregarded.</i></p>	<p><i>Specify what additional information the proponent could provide in the Detailed Project Description to address the issue, concern or uncertainty, for example:</i></p> <ul style="list-style-type: none"> <i>• Clarifications to elements of Project Description (e.g. components, activities, locations or alternatives);</i> <i>• Proposals on Project design changes that could avoid effects;</i> <i>• Evidence that could demonstrate that the effects will be negligible;</i> <i>• Evidence that standard mitigation measures will reduce or eliminate potential effects;</i> <i>• Commitments the proponent could make to respond to the question/issue, including the implementation of federal operational policies or guidance documents.</i> 	<p><i>For issues to be included in the Summary of Issues, provide a concise, plain-language synopsis of the issue and any questions or instructions for the proponent, if applicable.</i></p>

Please insert additional lines if necessary.