Federal Authority Advice Record (FAAR)

The FAAR must be submitted to the Registry by January 28, 2024.

Marguerite Lake Compressed Air Energy Storage Project - Federation Group Inc.

Department/Agency	Indigenous Services Canada (ISC-LEED-AB)			
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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?

Indigenous Services Canada (ISC) will not be required to exercise a power or perform a duty or function related to the Project as it is not responsible for approving or issuing licences, permits or authorizations for the assessments of large, proposed projects.

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.

ISC does not anticipate to exercise a power or perform a duty or function related to the Project.

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?

Yes

Specify the specialist or expert information or knowledge.

Indigenous Services Canada has a mandate to support Indigenous people (First Nations, Inuit and Métis) in their efforts to improve social well-being, health and economic prosperity; to develop healthier, more sustainable communities; and to participate more fully in Canada's political, social and economic development.

Indigenous Services Canada also has information and knowledge of Indigenous matters on Federal lands.

The First Nations and Inuit Health Branch (FNIHB) at ISC has specialist or expert information or knowledge pertaining to First Nations and Inuit in Canada. Areas of expertise include, but are not limited to: the provision of health services; community health and wellness programs; drinking water quality on First Nation reserves; and the social determinants of health (such as mental health and addictions, language, diet, chemical contamination of traditional foods or the perception of contamination).

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.

ISC has considered an interest in the Project related to impacts on Indigenous peoples and the rights of Indigenous peoples. ISC has not 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.

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.

To the best of its knowledge, ISC has had no previous contact or involvement with the proponent or other parties 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)?

ISC does not have any additional knowledge in these aspects.

Please specify if applicable.

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.

- 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 failoring 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.

Indigenous Services Canada
Name of department or agency involved
Sr. Environment Officer
Speaker title
1/18/2024
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
Please present comments by organization and comment number e.g.: IAAC-01	If the comment relates to a specific section of the initial project description, please provide the reference.	Identify valued component(s) or factor to consider—within the mandate of your department or agency—to which the potential effect or issue applies.	 Please provide a brief description of the issue and rationale for being a key issue. Include, where relevant: 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. 	 If applicable, please provide brief solutions/advice to address the issue or potential effect, including: 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. 	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.
ISC-01		Impacts to Indigenous peoples	Although this project is not on reserve land, reserve land may experience downstream effects from Project activities. Common concerns surrounding impacts to Indigenous communities may potentially be centred around: • loss of food security (traditional foods); • loss of lands with native habitats and associated wildlife; • impacts to soils, waters, and fish habitat; • loss of habitat for migratory birds;	It is important to continue engagement with the First Nations as well as the affected Métis groups or Métis Settlements identified in the IPD to best understand the potential impacts and incorporate traditional knowledge into the assessment.	Although this project is not on reserve land, reserve land may experience downstream effects from Project activities. It is important to continue to engage with potentially impacted First Nations and Métis groups or Settlements

GCDOCS # 121220318 GCDOCS # 121376110GCDOCS # 121376110 GCDOCS # 121417154

ISC-02	Impacts to Indigenous poorles	 localized climatic changes due to potential emissions during construction, operation, and decommissioning social well-being and economic prosperity; impacts to sacred sites and other cultural and heritage-sensitive areas; and The region that the Project is located has been subject to	Continued engagement with potentially impacted First	with respect to potential impacts and provide any information from this continued engagement to describe any potential downstream impacts to reserve land, the use of reserve land, or potential future interest (for example, economic development opportunities) in the land that may be impacted by the Project. Traditional knowledge and
130-02	Impacts to Indigenous peoples Cumulative effects	disturbances from industry and projects and activities. Although this project is not on reserve land, reserve land may experience cumulative effects from the Project.	Nations and Métis groups or Métis Settlements such that traditional knowledge and experience can be incorporated into assessment of cumulative effects.	experiences gathered from continued engagement with First Nations and Métis should be incorporated into cumulative effects assessments and the understanding of potential cumulative impacts to Indigenous peoples.

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
Please identify comments by organization and comment number. e.g. AEIC-01	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.	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.	 Specify what additional information the proponent could provide in the Detailed Project Description to address the issue, concern or uncertainty, for example: Clarifications to elements of Project Description (e.g. components, activities, locations or alternatives); Proposals on Project design changes that could avoid effects; Evidence that could demonstrate that the effects will be negligible; Evidence that standard mitigation measures will reduce or eliminate potential effects; Commitments the proponent could make to respond to the question/issue, including the implementation of federal operational policies or quidance documents. 	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.
ISC-01	Section 9.1.1 Physical Works Figure 4 Appendix C	Ancillary infrastructure for the project was identified to include fuel gas pipeline, two disposal wells and four source wells. Figures 4 and Appendix C only provide locations for one of the source wells. The IPD states that there are 28 water wells within a 5-kilometer radius, including 6 to 8 domestic wells. To be able to determine if there are potential impacts to drinking water sources for First Nations, it's necessary to identify if any of these wells are used by First Nations as sources of drinking water. It is not clear where the other three source wells are to be located and it is stated in section 9, "The location of source wells, observation well and disposal wells will be determined at a later design phase based on additional subsurface data and regulatory considerations" and "there may be a need	Provide any available information regarding the potential location of the remaining source water wells, the source and quantity of groundwater water for the Project, and information surrounding the current use of the groundwater source by other users. Identify any potential impacts to the quality and availability of groundwater to other users and in particular Indigenous people and communities. It is recommend the proponent provide details on the use of the domestic wells as sources of drinking water and if these are used by Indigenous Peoples and/or communities.	It is not clear where three of the four source wells are to be located and without this information it is not possible to know potential impacts to First Nations reserve lands or First Nations use and access to groundwater resources on reserve. Recommendation that the proponent provide more information about the use of domestic water wells near the project location and the potential interactions between Project activities and these domestic water wells. Provide any available information regarding the potential locations of the remaining source water wells, the sources and quantities of the groundwater, and information surrounding the current use of the groundwater sources by other users. Identify any potential impacts to the quality and availability of

		for water pipelines to convey water from the source wells or to disposal wells." Without more information on the source groundwater wells and their location it is not possible to determine potential impacts to the First Nations reserve land or the First Nations use and access to groundwater resources on reserve.		groundwater to other users including Indigenous people and communities.
ISC02- FNIHB*	9.1 Project Works and Activities 14.4 Groundwater and Surface Water 19.1 Fish and Fish Habitat, as Defined in Section 2(1) of the Fisheries Act 21.1 Potential Effects to Indigenous Physical and Cultural Heritage and Land Use	The IPD does not clearly identify water bodies serving as potential drinking water sources for First Nations or for the water treatment plant that may be impacted by the project. Furthermore, there are few details on potential impacts from the project on any bodies of water and their tributaries used for ceremonial, spiritual, traditional, or cultural purposes. The IPD also describes the construction of a fuel gas pipeline that will be adjacent to the La Corey North Resource Road and within existing easements, as well as the potential need for a source water pipeline. However, it is unclear about the potential impacts of these pipelines on streams, culverts, or other water bodies. The IPD is missing important details about the construction of the fuel gas pipeline and the potential impacts from it.	 Recommend that the proponent identify potential drinking water sources and water bodies used for a drinking water treatment plant, along with their tributaries. This will help understand the potential impacts of the project on water quality. Recommend that the proponent identify any bodies of water and their tributaries that are used for cultural, spiritual, traditional or ceremonial purposes and the potential for the project to impact these water bodies. Recommend that the proponent provide additional details on potential impacts of the new fuel gas pipeline and source water pipeline. This includes understanding which lands and water bodies could be affected by the pipeline and the potential impact to the health of Indigenous Peoples. 	Recommendation that the proponent provide information about the use of water sources nearby the project by Indigenous Peoples. Recommendation that the proponent provide more information about the new fuel gas pipeline and source water pipeline and the risk to the land and water from its construction.
ISC-03-FNIHB	15.3.4 Labor and Economy	The social determinants of Aboriginal Health includes employment and income (National Collaborating Centre for Aboriginal Health, Health Inequalities and Social Determinants of Aboriginal Health). Employment is directly related to household income, this is associated with access to health care and resources necessary for health. Unemployment is closely linked to health inequity.	 Recommend that the proponent identify and address any barriers that may hinder the active participation of Indigenous communities in project-related employment opportunities and work with those communities to address these barriers. Consider implementing targeted outreach programs, training initiatives, and support 	Recommendation that the proponent work with Indigenous communities to facilitate job opportunities for Indigenous Peoples. The proponent should continue engagement with Indigenous communities that may be affected by the project throughout the life of the project.

		The proponent anticipates the project will generate economic benefits for the region through the creation of 200 full-time jobs during the construction phase and 20 full-time positions for ongoing operations. However, there is only a few details on the source of the employment and barriers to the participation of Indigenous communities for these job opportunities. It is crucial to examine where the construction workers come from, addressing concerns about transient workers (e.g., violence against Indigenous women and girls (Native Women's Association of Canada)) and ensuring a clear understanding of how the project's economic advantages will be distributed within the local community. This analysis is essential for fostering equitable employment opportunities for Indigenous Peoples, minimizing barriers to participation, and maximizing positive impacts for Indigenous Peoples that may be impacted by the project	-	services to facilitate increased Indigenous employment. Recommend that the proponent continue ongoing engagement with the Indigenous communities that may be impacted by the project, to gather feedback on the economic impact of the project. This ensures that the community's and concerns are considered throughout the project's lifecycle.	
ISC-04-FNIHB	21.1 Potential Effects to Indigenous Physical and Cultural Heritage and Land Use	In the IPD, the proponent indicates that Indigenous groups have voiced concerns about various impacts, encompassing wildlife, hunting, water resources, cumulative effects, among others. Additionally, field tracking surveys conducted in the project location have identified the presence of several game species. The proponent has also acknowledged concerns regarding the potential loss of access to preferred traditional use areas for Indigenous Peoples due to the project's construction and/or operation. These concerns extend to potential impacts on the food security of Indigenous Peoples affected by the project. It is important for the proponent to recognize that these potential project impacts may affect the food security of Indigenous Peoples. The World Bank	-	Recommend that the proponent provide a discussion on the project's potential impacts on food security of Indigenous Peoples. Additionally the DPD should contain planned mitigation measures to address the risk to food security from impacts related to the project. The proponent should consider implementing a Food Security Management Plan. This plan would outline specific measures to address food security of Indigenous Peoples as well as a formal process to monitor and report on Food Security. Recommendation that additional details are provided on potential impacts of the project on hunting and gathering. Additionally,	Recommend that the proponent provides more details about how the construction and operation of the project could affect the traditional foods important to Indigenous communities and how these impacts might influence the food security of Indigenous communities. It is also recommended that the proponent review the results of the First Nations Food Nutrition and Environment Study in Alberta, available at the following URL: https://www.fnfnes.ca/docs/FNFNES_Alberta_Region_al_Report_ENGLISH_2019-10-09.pdf The regionally representative study has highlighted a very high level of food insecurity among First Nations in Alberta (47%). The issues are described on pp.19-24.

		defines food security as the state in which all individuals consistently have physical and economic access to sufficient safe and nutritious food that meets their dietary needs and preferences, promoting an active and healthy life (World Bank, 1996). Food insecurity is a continuing public health challenge effecting Indigenous Peoples (Power, 2008). References: Power, E.M. 2008. Conceptualizing Food Security for Aboriginal People in Canada. doi: 10.1007/BF03405452. World Bank. 1996. What is Food Security? Available online: https://www.worldbank.org/en/topic/agriculture/brief/food-security-update/what-is-food-security	details concerning the impacts of the project on the preferred hunting and gathering locations of Indigenous Peoples. A more comprehensive assessment should be undertaken that considers the cultural significance of these areas. This approach would facilitate a deeper understanding of potential disruptions to Indigenous Peoples' traditional practices.	
ISC-05-FNIHB	4.1 Indigenous Groups	ISC is responsible for providing programs and services to Indigenous Peoples to address the environmental, health and socio-economic conditions in their communities. To do so, demographic information is necessary for decision-making and designing meaningful operational plans and policies. There is a lack of demographic information in Section 4.1 Indigenous Groups regarding the eleven identified Indigenous communities that may be impacted by the proposed project. To strengthen this section, the proponent should include information on population size (e.g., on and off reserve population) and the distance between the Indigenous communities and proposed project location. In addition, where possible, the proponent should include disaggregated data (e.g., age, gender, level of education, employment by sector).	- Recommend that the proponent include demographic information in Section 4.1. Indigenous Groups. This should include: population size (e.g., on and off reserve population), and distance from the proposed project. In addition, where possible, the proponent should include disaggregated data (e.g., age, gender, level of education, employment by sector). Resource: First Nation Profiles	There is a lack of demographic information in <i>Section 4.1 Indigenous Groups</i> . The proponent should include information on the population size (e.g., on and off reserve) and distance from the proposed project for the eleven identified Indigenous communities. In addition, where possible, the proponent should include disaggregated data (e.g., age, gender, level of education, employment by sector).
ISC-06-FNIHB	14.7 Fish and Fish Habitat	Cold Lake First Nation has expressed concerns regarding how the proposed project may affect their	 Recommend that the proponent request information on what aquatic species 	It is unclear what aquatic species Cold Lake First Nation fishes for or harvests at Marguerite Lake. It is

	22.1 Potential Effects to Indigenous Health "No likely potential effects to fish and fish habitat have been identified." (page 61) "Based on the preceding, though some incremental effects to harvesting are expected, Federation does not anticipate any health impacts to Indigenous peoples due to the Project." (page 61)	Aboriginal and Treaty rights, specifically their ability to hunt, fish, trap and practice cultural activities. Members of Cold Lake First Nation have shared that they hunt within 3-kilometers of the proposed project site (for moose, rabbits and grouse), as well as fish at Marguerite Lake, which is located 2.48-kilometers from the proposed project site. Members have also shared that they use the shores of Marguerite Lake and the surrounding area for moose hunting. It is unclear what aquatic species Members of Cold Lake First Nation fish for or harvest at Marguerite Lake. The proponent should request this information from Cold Lake First Nation and include it in the Detailed Project Description. In addition, the proponent should request dietary and food consumption information, pertaining to subsistence harvesting, from Cold Lake First Nation. If Cold Lake First Nation does not have this information, the proponent should complete a Dietary and Food Consumption Survey in partnership with the community during the Impact Statement Phase.		Members of Cold Lake First Nation fish for or harvest at Marguerite Lake. In addition, the proponent should request dietary and food consumption information from Cold Lake First Nation regarding the project area. If this information does not exist, the proponent should complete a Dietary and Food Consumption Survey in partnership with Cold Lake First Nation during the Impact Statement Phase.	recommended that the proponent request dietary and food consumption information from Cold Lake First Nation regarding the project area. This information should be included in the Detailed Project Description. If this information does not exist, the proponent should complete a Dietary and Food Consumption Survey in partnership with the community during the Impact Statement Phase. It is recommended that the survey be done by a nutritionist experienced in dietary research. Results can be compared to the regionally representative results of the First Nations Food Nutrition and Environment Study referenced earlier (https://www.fnfnes.ca/docs/FNFNES_Alberta_Region al_Report_ENGLISH_2019-10-09.pdf).
ISC-07-FNIHB	22.1 Potential Effects to Indigenous Health	Due to the amount of industrial and military activities, both historical and present, within the Cold Lake region, the proponent should give significant weight and consideration to the impacts of cumulative effects on the health of Indigenous peoples, as well as their Aboriginal and Treaty rights (e.g., access to land, ability to conduct traditional and cultural practices, ability to transfer culture and traditional knowledge to future generations, impacts to mental, physical and spiritual health and wellbeing).	-	Recommend that the proponent consider and include information on the impact of cumulative effects on the health of Indigenous peoples, as well as their Aboriginal and Treaty rights, in the Detailed Project Description.	Due to the amount of industrial and military activities within the Cold Lake region, the proponent should consider the impact of cumulative effects on the health of Indigenous peoples, as well as their Aboriginal and Treaty rights. How may cumulative effects from industrial and military activities impact the health of Indigenous peoples in the Cold Lake region? How may cumulative effects from industrial and military activities impact the Aboriginal and Treaty rights of Indigenous peoples in the Cold Lake region?
ISC-08-FNIHB	22.1 Potential Effects to Indigenous Health	In fiscal year 2016-2017, the First Nations Environmental Contaminants Program at Indigenous Services Canada provided \$88,759.00 in funding	-	Recommend that the proponent contact Cold Lake First Nation for the results of their research project titled <i>An assessment of</i>	In 2016-2017, the First Nations Environmental Contaminants Program provided funding support to Cold Lake First Nation for a project titled <i>An</i>

support to Cold Lake First Nation for a project titled An assessment of Cold Lake First Nations member's exposure to metals through ingestion of moose tissues. Through this project, Cold Lake First Nation sampled moose muscles and organs to analyze metal concentrations (i.e., lead and cadmium), as well as completed a dietary survey to determine local moose consumption patterns. In addition, a human health risk assessment was conducted to assess the potential health risks associated with the exposure to Resource: metals from the consumption of moose meat. The study concluded that moose muscle was safe to eat in quantities recommended in the Canada Food Guide, whereas moose organs should be consumed only occasionally and in moderate amounts.

The proponent should contact Cold Lake First Nation for the results of this study, as well as inquire to see if other similar studies have been conducted regarding country/traditional foods. The results of this study will provide insight into the cumulative effects and food insecurity experienced by Cold Lake First Nation.

Cold Lake First Nations member's exposure to metals through ingestion of moose tissues. The proponent should also inquire about other country/traditional food studies. Information from these studies could be integrated into the Detailed Project Description and provide more insight on food security and cumulative effects.

An assessment of Cold Lake First Nations members' exposure to metals through ingestion of moose tissues - First Nations Environmental Contaminants Program - FNECP (fnecpplcepn.ca)

assessment of Cold Lake First Nations member's exposure to metals through ingestion of moose tissues. It is recommended that the proponent result the results of this study, as well as other country/traditional food studies to inform the potential impact of the project on Indigenous health (e.g., food security, cumulative effects).

^{*} inclusion of "FNIHB" in comment number indicates comment was drafted by or with input from First Nations Inuit Health Branch; related follow up should include FNIHB contacts. Please insert additional lines if necessary.