

Federal Authority Advice Record (FAAR)

New Nain Airport Project – Nunatsiavut Government

Registry reference no: 87156

Department/Agency	Health Canada
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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.

No

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.

Not applicable (N/A)

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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.

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 the 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 health impact assessment; and
- Public health emergency management of toxic exposure events.

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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.

Not applicable (N/A)

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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)?

Please 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 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.

No

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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 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.

Beverly Ramos-Casey
Health Canada

Name of department or agency involved

Environmental Health Programs
Regional Manager

Speaker title

2024-1-24

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
HC-01	<p>Section 5.3 Land and Resource Use</p> <p>Section 6.2.4 Land and Resource Use</p>	Human Health – General	<p>Without sufficient information on locations of human receptors or traditional land use activities, Health Canada cannot provide informed comments on Key Issues.</p> <p>For a project to present a risk to human health from exposure to chemical substances, three criteria must be present: the potential for releases of contaminants of potential concern (COPCs), the presence of human receptors, and route(s) of exposure. Human health may also be affected by noise emissions reaching human receptors in the vicinity of a project-related activity (e.g., construction activities, increase marine traffic, etc.). Well-being may also be impacted by changes to social and economic conditions.</p> <p>Section 6.2.4 of the IPD states : “Developments have the potential to result in land use conflicts where resources overlap with lands used for traditional purposes by Indigenous Peoples and/or used by residents.”</p> <p>In addition, there is a lack of specificity on potential linkages between Project activities, effects on the natural environment (including country foods), and exposure pathways.</p> <p>Health Canada acknowledges that a land-use study will be conducted by Nunatsiavut Lands and Natural Resources (NLNR) and used to inform the EA (as per Section 5.3.1.1 in the IPD). However, without the information that the land-use study will provide (e.g., presence or existence of camps, harvesting activities, etc.), and given the potential for project activities to overlap with traditional land use in the project area, Health Canada cannot accurately assess the potential health impacts of the project on the local Indigenous community.</p>	<p>HC recommends that the following information be requested:</p> <ol style="list-style-type: none"> 1) If possible, provide a map indicating the Project area and approximate locations of known temporary/permanent/seasonal residences, traditional land uses (e.g., hunting, trapping), and known locations of sensitive human receptors (e.g., schools, daycare centres, hospitals, assisted care homes). If a map cannot be made available, provide the distances of human receptor locations from project components. 2) Complete a preliminary problem formulation of human health risks by describing potential linkages between Project activities, effects on the natural environment (including country foods), and exposure pathways. <p>For reference, Health Canada’s <i>Guidance for Evaluating Human Health Impacts in Environmental Assessment: Human Health Risk Assessment</i>, available at https://publications.gc.ca/site/eng/9.870475/publication.html</p> <p>Further guidance is available, upon request to ia-ei@hc-sc.gc.ca, in Health Canada’s <i>Interim Guidance Document for the Health Impact Assessment of Designated Projects under the Impact Assessment Act</i>. Draft for review. June 30, 2022.</p>	There is insufficient information about the location of human receptors, and the pathways between Project effects and humans, to assess the potential impacts of the Project on human health.
<p>Given the information available, Health Canada (HC) considers it premature to attempt to remove relevant human health Key issues at this phase. However, the scope of the analysis recommended in comments HC-02 to HC-04 should be adapted to the human receptors present and their concerns.</p>					

HC-02	<p>Section 2.3.2.1 Air Emissions</p> <p>Section 4.1.2 Air Quality</p> <p>Section 5.3.1.1 Land and Resource Use Study</p> <p>Section 6.1.3.1 Water Resources Key Considerations and Potential Interactions</p>	<p>Human Health – Country Food – Air Quality – Water Quality</p>	<p>There is insufficient detail around project activities that may potentially release pollutants to assess potential impacts of the Project on human health.</p> <p>For example, in Section 6.1.1.1 of the IPD, a complete list of chemicals of potential concern (COPCs) has not been identified, including nitrogen dioxide (NO₂), fine particulate matter (PM_{2.5}), volatile organic compounds from diesel fuel, and diesel particulate matter (DPM). In addition, the potential for contamination of country foods from dust deposition is not identified in the IPD.</p> <p>In another example, Section 6.1.3.1 of the IPD states that “Several potential contaminants will be in use during Project operation, including maintenance and painting chemicals. Fuel may also be released to the environment from the on-site fuel tanks and refuelling stations in the event of an accident or spill. These contaminants have the potential to be leached into groundwater or contaminate stormwater runoff, which can pollute nearby watercourses.” However, a list of the potential contaminants of concern that could impact ground or surface water has not been identified.</p> <p>Furthermore, Section 6.1.1.1 states “The Project will comply with all regulations by following applicable guidelines and standards to appropriately address this VC. Health Canada recommends that the Canadian Ambient Air Quality Standards (CAAQS) should also be referenced.</p>	<p>HC recommends that the following information be requested:</p> <ol style="list-style-type: none"> 1) Provide a complete list of Project activities (including sources) that may result in pollutant emissions. 2) Provide a complete inventory of all potential project pollutants including, but not limited to, NO_x, NO₂, SO₂, CO, ozone (O₃), PM_{2.5}, coarse particulate matter (PM₁₀), PAHs, VOCs, DPM, and metals. Justify the exclusion of any common pollutants from further consideration. 3) Refer to the most stringent and most up to-date federal and provincial air quality criteria and compare the baseline data to CAAQS. 	<p>There is insufficient detail around project activities that may potentially release pollutants to assess potential impacts of the Project on human health.</p>
HC-03	<p>Section 2.3.1.3 Hazardous Materials and Hazardous Waste</p> <p>Section 2.5 Health, Safety and Environmental Management</p> <p>Section 2.5.2 Environmental Management</p> <p>Section 2.5.3 Emergency Response</p>	<p>Human Health – Accidents and Malfunctions</p>	<p>Section 2.3.1.3 of the IPD states that “Plans will be prepared for managing hazardous materials and waste, as well as emergency response.” and indicates in Section 2.5 that health, safety, and environmental management will be addressed through various plans and procedures. However, specific aspects warrant clearer articulation.</p> <p>In Section 2.5.2, plans and regulations are listed under health and safety and environmental management sections; however, specific mitigation measures for accidents and malfunctions are missing.</p> <p>Section 2.5.3 of the IPD indicates that the Emergency Response Plan will align with the <i>Canadian Aviation Regulations</i> (CAR) Recommended Practices. However, there is a lack of detail on potential contamination scenarios. The handling of incidents like chemical spills, fuel leaks (including during the delivery and storage of jet A fuel), containment failures, and their subsequent effects on</p>	<p>HC recommends that the following information be requested:</p> <ol style="list-style-type: none"> 1) Provide a preliminary list of accident and malfunction scenarios (e.g., during transportation, storage, or handling of hazardous materials) and a discussion regarding their potential effects to human health. 2) Provide preliminary details on the proposed Environmental Health and Safety Contingency Plan. <p>Health Canada’s <i>Guidance for the Environmental Public Health Management of Crude Oil Incidents</i> document on responding to crude oil incidents may be useful to inform emergency response planning if it is determined that an IA is required. Available at: https://publications.gc.ca/collections/collection_2018/sc-hc/H129-82-2018-eng.pdf</p>	<p>There is insufficient information regarding accidents and malfunctions scenarios to identify the potential for human health impacts.</p>

			<p>drinking/recreational water, country foods, or local air quality remain unknown.</p> <p>Furthermore, an in-depth discussion of potential residual effects is missing, particularly concerning indigenous health or broader community health in the context of accidents and malfunctions.</p>		
HC-04	<p>Section 5.1.3 Demographic Characteristics</p> <p>Section 5.4.1 Social Determinants of Health</p> <p>Section 5.4.1.2 Food Security</p> <p>5.5 Economy, Employment and Business</p>	Human Health – Determinants of health	<p>It is unclear how different subgroups of the population (e.g., men vs. women, Indigenous vs. non-Indigenous, youth vs. elderly, etc.) may be impacted by the potential adverse impacts mentioned in section 6.0.</p> <p>Section 5.4.1 of the IPD explains the Social Determinants of Health and identifies Food Security (Section 5.4.1.2) as an area potentially affected by the project.</p> <p>Section 5.5 of the IPD details the current labour force demographics and different initiatives currently in service for Labrador Inuit but doesn't detail impacts from the new project on equality with respect to gender and diversity groups in the workforce.</p> <p>It is unclear how different subgroups of the population (e.g., men vs. women, Indigenous vs. non-Indigenous, youth vs. elderly, etc.) may be considered in the assessment and impacted by the potential negative impacts of the project.</p>	<p>HC recommends that the following information be requested:</p> <p>Provide a description of the local communities' subgroups and apply Gender-based Analysis Plus (GBA+) to better identify how Project effects may result in differential impacts within each group.</p> <ul style="list-style-type: none"> Identify vulnerable or marginalized groups within the community. Understand the unique challenges and opportunities each group faces. Assess how the project might enhance or mitigate these challenges and opportunities. <p>Further guidance on applying GBA+ to impact assessments is available in the Impact Assessment Agency of Canada's <i>Guidance: Gender-Based Analysis Plus in Impact Assessment</i>, available at: https://www.canada.ca/en/impact-assessment-agency/services/policy-guidance/practitioners-guide-impact-assessment-act/gender-based-analysis.html</p>	There is insufficient information to assess the potential for sub-populations to be differentially impacted by the Project.