

Federal Authority Advice Record (FAAR)

The FAAR must be submitted to the Registry by January 26, 2024.

New Nain Airport Project – Nunatsiavut Government

Registry reference no: 87156

Department/Agency	Environment and Climate Change Canada
Lead contact	Michael Hingston
Full address	45 Alderney Drive, Dartmouth, NS B2Y 2N6
Email	Michael.hingston@ec.gc.ca
Telephone	902 225-3534
Alternate Contact	Jerry Pulchan

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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?

Yes

Species at Risk Act permits

For species listed in Schedule 1 of the *Species at Risk Act* (SARA) as Extirpated, Endangered or Threatened, a permit may be required from ECCC (section 73 of SARA) for activities that affect a listed terrestrial wildlife species, any part of its critical habitat, or the residences of its individuals, where those prohibitions are in place. Such permits may only be issued: if all reasonable alternatives to the activity that would reduce the impact on the species have been considered and the best solution has been adopted; all feasible measures will be taken to minimize the impact of the activity on the species or its critical habitat or the residences of its individuals; and if the activity will not jeopardize the survival or recovery of the species. Permits are also required by those persons conducting activities that contravene the critical habitat destruction prohibitions (subsection 58(1)).

Prohibitions are in place for individuals and residences on federal lands in a province, reserve or any other lands under the *Indian Act*, or lands under the authority of the Minister of the Environment, and for birds listed under the *Migratory Birds Convention Act, 1994* wherever they occur regardless of land tenure.

Furthermore, prohibitions may be in force on land other than federal land pursuant to other orders or regulations under SARA. It is possible that further prohibitions may come into force in the future through orders in Council for individuals, residences and critical habitat on non-federal lands and / or through ministerial order for critical habitat on federal lands. It is also possible that, over the course of the assessment or after the assessment, additional species could be listed under SARA; permits may be required for project activities that affect these additional species. Proponents are advised to monitor for such developments on the SARA Registry <https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry.html>.

Examples of activities that could require a *Species at Risk Act* permit include:

- Direct habitat loss (e.g., availability, quality) caused by construction and operation activities;
- Indirect habitat loss (e.g., availability, quality) caused by sensory disturbance (e.g., noise, light, and dust emissions);
- Reduction in habitat connectivity caused by physical barriers to movement;
- Increased exposure to contaminants, accidental release of harmful substances (e.g., hydrocarbons, etc.) caused by construction and operation activities; and
- Increased aircraft and vehicle traffic leading to increased risk of bird collisions, attraction to the Project area, and release of harmful substances.

ECCC will require detailed information on the potential effects of the project, including locations and/or occurrences of species at risk, their use of habitat and critical habitat within the project area, and specific effects on federal land, before ECCC can determine whether a SARA permit is required.

Links to publicly available documents:

- [Guidelines for permitting under Section 73 of Species at Risk Act](https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry/policies-guidelines/permitting-under-section-73.html) <https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry/policies-guidelines/permitting-under-section-73.html>
- [Species at Risk Permitting Policy](https://species-registry.canada.ca/index-en.html#/consultations/2983) <https://species-registry.canada.ca/index-en.html#/consultations/2983>

In the event that a SARA permit is required, ECCC would evaluate and determine consultation requirements, if any.

ECCC-led Indigenous consultations related to the issuance of SARA permits will be coordinated with consultation during the impact assessment where possible.

If a permit is issued, the description of the activity and how SARA's preconditions were met will be posted on the SARA Registry here: <https://species-registry.canada.ca/index-en.html#/permits>

If not fully described in the Initial Project Description, the proponent should provide any anticipated need for species at risk permits during all phases of the project, including in the Detailed Project Description if possible. The proponent is encouraged to collect and submit the information necessary to determine if a SARA permit is required during the impact assessment process, and to submit their application well in advance of the proposed activities to avoid delays.

Further information regarding species at risk permits will be provided in the Permitting Plan.

Migratory Birds Convention Act permits

The *Migratory Birds Regulations, 2022* (MBR 2022) protect migratory birds, their eggs and their nests, by prohibiting activities that may harm them. Unless a person has a permit or the regulations authorize it, it is prohibited to engage in the following activities:

- Capturing, killing, taking, injuring or harassing a migratory bird or attempting to do so;
- Destroying, taking or disturbing an egg; and
- Damaging, destroying, removing or disturbing a nest, nest shelter, eider duck shelter or duck nesting box, unless the following exceptions apply:

- The nest does not contain a live migratory bird or a viable egg; and,
- The nest was not built by a species listed in Schedule 1.

Modernization of the MBCA in 2022 has additionally identified 18 species of birds whose nests are protected year round (Schedule 1 of MBR 2022). The nests of species listed in Schedule 1 are protected at all times, unless the following conditions are met:

- Notification of the unoccupied nest has been submitted/received through the Registry for Abandoned Nests; and,
- The waiting time designated in the regulations has passed, during which time the nest has not been occupied by a migratory bird.

In some situations, it may be possible to obtain a permit to move or destroy an unoccupied nest of a Schedule 1 species. For more information, please visit: <https://www.canada.ca/en/environment-climate-change/services/avoiding-harm-migratory-birds.html>

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 excise of that power, duty or function, including when it would take place.

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?

ECCC has specialist or expert information that may be relevant to the impact assessment in the areas listed below. In each of these subject areas we have expertise related to establishing an adequate baseline, assessing potential effects to biophysical valued components, effectiveness of mitigation measures, methods for monitoring and follow-up, as well as information regarding federal policies, standards, and regulations that may be relevant to the assessment (Note: ECCC does not assess proposed projects for regulatory compliance, but instead provides technical input to the Agency to inform the assessment). Once the scope of the project and of the assessment are established by the Agency, this list may change if additional project activities or components should come into scope.

Air quality: ambient air quality; sources of emissions; emissions estimation and measurement; atmospheric transport, transformation and dispersion modelling; and follow-up monitoring.

Greenhouse gas emissions and climate change: estimations of greenhouse gas (GHG) emissions (net and upstream); carbon sinks; GHG mitigation measures and determination of Best Available Technologies/Best Environmental practices (BAT/BEP); credible plans to achieve net-zero GHG emissions by 2050; climate change science to inform evaluation of potential changes to the environment and project resilience to effects of climate change; climate change policies; and national GHG projections.

Water quality and quantity: surface water quality; contamination sources for surface water and groundwater, including effluent; wastewater; water quality predictions and modelling; seepage and runoff effects; management of contaminated soils or sediments; hydrology (streamflow rates data and modelling, flooding and extreme events management, drainage control, water levels, water balances); geochemistry; cumulative effects and follow-up and monitoring.

Wildlife, species at risk, and habitat: priority species and places as outlined in the *Pan-Canadian Approach to transforming species at risk conservation in Canada*¹; migratory birds, their nests, eggs, and habitat under authority of the Migratory Birds Convention Act 1994; species assessed by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC); species at risk, individuals, their residences,

¹ <https://www.canada.ca/en/services/environment/wildlife-plants-species/species-risk/pan-canadian-approach/species-at-risk-conservation.html>

habitat and critical habitat including recovery strategies, action plans and management plans under ECCC's mandate; ecological function of wetlands; and ecotoxicology.

Environmental emergencies: emergency management planning and guidance, including where the release of hazardous substances could affect species at risk and/or migratory birds; atmospheric transport and dispersion modelling of contaminants in air; fate and behaviour; and hydrologic trajectory modelling of contaminants in water.

Climate and meteorology: long-term climate patterns and norms; marine winds and weather.

[Open Science Data Platform \(OSDP\)](#)

The Open Science Data Platform (OSDP) provides information relevant to cumulative effects and development activities across Canada, and is publicly available at the following website: <https://osdp-psdo.canada.ca/dp/en>. More specifically, the platform provides a single window to access data and scientific knowledge relevant to understanding cumulative effects from existing federal, provincial, and territorial on-line databases and registries, including publications from the federal government and its scientists. It provides an interactive geospatial mapping tool to enable mapping of multiple datasets from multiple sources. It offers various features, including keyword-based searching, interactive data visualization on maps, and educational resources covering key topics such as cumulative effects, water, air, climate, biodiversity, land, economy and industry, health, and society and culture. OSDP information may be of value to persons preparing and reviewing projects assessments, including cumulative effects assessments. The following are some examples of ECCC information available on the OSDP.

Water – quality and quantity

- [National long-term water quality monitoring data](#)
- [Real-time hydrometric data](#)
- [Canadian Aquatic Biomonitoring Network \(CABIN\)](#)
- National Pollutant Release Inventory (NPRI)
 - [Facilities that reported releases to water](#)
- Find [additional water-related resources \(including publications, datasets and monitoring stations\) from ECCC on the OSDP here](#).

Biodiversity (e.g., birds, species at risk, wetlands)

- [Critical habitat for species at risk \(terrestrial\)](#)
- [Range map extents – Species at risk](#)
- [Canadian wetlands](#)
- [Canadian Protected and Conserved Areas Database \(CPCAD\)](#)
- [Canadian Breeding Bird Census plots](#)
- [Priority places for species at risk](#)
- Find [additional biodiversity-related resources \(including publications, datasets and monitoring stations\) from ECCC on the OSDP here](#).

Air Quality

- National Pollutant Release Inventory (NPRI), including:
 - [Facilities that reported release of criteria air contaminants](#)
- Canadian Environmental Sustainability Indicators (CESI), including
 - [Average ambient fine particulate matter concentrations](#)
 - [Peak ambient ozone concentrations](#)
 - [Ambient volatile organic compound concentrations](#)
 - [Average ambient sulphur dioxide concentrations](#)
 - [Peak ambient nitrogen dioxide concentrations](#)
- Find [additional air-related resources \(including publications, datasets and monitoring stations\) from ECCC on the OSDP here](#).

Climate, including climate change

- [Hourly](#) and [daily climate observations](#)
- [Monthly climate observation summaries](#)
- [Climate normals, averages and extremes 1981-2020](#)
- [Homogenized surface air temperature](#)
- [Adjusted precipitation](#)
- Find [additional climate-related resources \(including publications, datasets and monitoring stations\) from ECCC on the OSDP here](#).

Beyond ECCC's mandate, the OSDP also contains resources on topics led by departments and other levels of government (e.g., human health, economy and industry). The OSDP also provides access to regulatory registries that list government authorizations of other developments (e.g., *Fisheries Act* Registry), which can be useful in understanding the cumulative pressures on an area.

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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?

ECCC has not considered, exercised a power or performed a duty, or taken any course of action as part of the Project.

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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)?

ECCC has not had any previous contact with the proponent. ECCC has received notification of the project from both the Newfoundland and Labrador, and Nunatsiavut Governments but other than copying them on ECCC submissions to the federal assessment we have not had any specific interactions with them.

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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)?

Not at this time.

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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.

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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.

Environment and Climate Change
Canada

Name of department or agency

Michael Hingston, Head,
Environmental Assessment, Atlantic
Speaker title

Jan. 26, 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
<p><i>Please present comments by organization and comment number</i></p> <p><i>e.g.: IAAC-01</i></p>	<p><i>If the comment relates to a specific section of the initial project description, please provide the reference.</i></p>	<p><i>Identify valued component(s) or factors to consider—within the mandate of your department or agency—to which the potential effect or issue applies.</i></p>	<p><i>Please 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 sequence of potential effects;</i> • <i>the relevant context that specifies why this is a key issue;</i> • <i>key uncertainties that should be addressed in the impact assessment;</i> • <i>Indigenous or public concerns or perspectives;</i> • <i>scientific data or traditional knowledge, including from previous projects, that justifies the inclusion of the key issue in the project assessment.</i> 	<p><i>If applicable, please provide brief solutions/advice to address the issue or potential effect, including:</i></p> <ul style="list-style-type: none"> • <i>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;</i> • <i>any powers your department or agency has that may mitigate, manage or set conditions related to the issue;</i> • <i>advice or policies to frame and mitigate the potential effect;</i> • <i>standardized mitigation or monitoring measures that could manage potential effects, including follow-up on monitoring activities;</i> • <i>commitments the proponent could make to respond to the issue.</i> 	<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, if applicable.</i></p>
<p>ECCC-01</p>	<p>6.1.7 Wildlife and Migratory Birds</p>	<p>Migratory Birds and Species at Risk</p>	<p>Quote (Page 88): <i>“Project-related effects to wildlife and migratory birds are possible via several pathways, including: ... Disturbance from light pollution;...”</i></p> <p>Quote (Page 23): <i>“The Access Road is not expected to be lit, unless required for safety or regulatory reasons.”</i></p>	<p>The following information is missing from the Initial Project Description:</p> <ul style="list-style-type: none"> • How much light is anticipated as a result of all phases of the Project (i.e., a lighting design plan); • Alternative lighting options to reduce lighting emissions. • A detailed, Project- and location-specific description of the potential impacts of light attraction on migratory birds and species at risk, including species of conservation concern; and 	<p>1. Provide information on the amount of light pollution expected during all phases of the Project and for all Project infrastructure (i.e., lighting design plan), and an alternatives assessment related to</p>

			<p>Quote (Record of Questions and Answers, Public Information Session): Question or comment: <i>“Will the road have lighting? Running fuel or off energy supplied to airport?”</i> Response provided: <i>“Yes. Different options for lighting; some solar technologies for street lighting.”</i></p> <p>The Initial Project Description briefly states that light pollution emissions can impact migratory birds, including migratory birds that are also listed on Schedule 1 of the Species at Risk Act (SARA) or species of conservation concern (SOCC), but does not adequately describe the potential Project-specific effects that may result from the Project, or the amount of light that the Project activities will create at the Project site. Additionally, the Proponent provides conflicting information regarding the installation and operation of lighting on the proposed access road.</p> <p>There are numerous seabird and waterfowl colonies in the Nain region, which host migratory bird species including, but not limited to, Black Guillemot, Razorbill, Atlantic Puffin, Thick-billed Murre, Common Murre, Great-black Backed Gull, Herring Gull, Glaucous Gull, and Common Eider. These species may become attracted to artificial lighting at the Project site (Options 1 or 2) due to the proximity to the coast (500 m).</p> <p>The proponent has not adequately described the planned lighting design/emissions proposed for the Project and has not discussed alternative options for lighting that will reduce potential attraction of migratory birds and species at risk (SAR) (including species of conservation concern (SOCC)). Additionally, the proponent has not adequately described the potential effect in the context of Project-specific baseline information (i.e., nearby seabird colonies, other sensitivities) or the mitigation and/or monitoring measures that will be implemented to avoid or reduce potential impacts to migratory birds, SAR and SOCC.</p>	<ul style="list-style-type: none"> Project-specific mitigation measures and monitoring program(s) that will be implemented to reduce potential impacts of light attraction on migratory birds and species at risk, including species of conservation concern. <p>Due to the propensity of birds to be attracted to light, particularly seabirds from nearby colonies, it is possible that migratory birds may be attracted to and potentially be stranded at the Project site, particularly at the “Option 1” and “Option 2” sites. The proponent should develop and implement a systematic site monitoring plan, particularly during the migratory bird breeding season (mid-April to mid-August for most migratory bird species) as well as the spring and fall migration periods and implemented while floodlights are being used during nighttime hours. A site monitoring plan could include protocols such as dusk and dawn site inspections to look for stranded birds that may have landed on site, and/or inclusion of migratory bird searches into standard occupational health and safety daily inspections, etc.</p> <p>Should birds become stranded on the project site, both during construction and operations phases, the proponent is recommended to adhere to Procedures for handling and documenting stranded birds encountered on infrastructure offshore Atlantic Canada (attached; it should be noted that this reference document has been developed for offshore vessels and may require modification for use on an onshore facility). A seabird handling permit will be required to implement the instructions in this reference document and the proponent must be advised that such a permit would have to be in place prior to the initiation of proposed activities. Please note that MBCA permit applications can be obtained from ECCC via email at Permi.atl@ec.gc.ca.</p> <p>In the event of the mortality of an individual migratory bird species at risk or 10 or more dead or stranded non-petrel species in one event ECCC should be notified within 24 hours via the CWS Main Office at (506) 364-5044 or via email to SCFATLEvaluationImpact-CWSATLImpactAssessment@ec.gc.ca).</p>	<p>light emissions from the Project.</p> <p>2. Provide a description of the potential effect of light attraction on migratory birds and species at risk (including species of conservation concern) as a result of all phases of the Project and for all Project infrastructure.</p> <p>Provide a description of mitigation measures and monitoring program(s) that will be implemented to avoid or minimize the effect of light attraction on migratory birds and species at risk (including species of conservation concern) during all phases of the Project and for all Project infrastructure.</p>
ECCC-02	4.4.2 – Avifauna	Migratory Birds	The Initial Project Description briefly describes the pathways of effects and standard mitigations that are expected for migratory birds (protected under	Migratory birds, the nests of migratory birds and/or their eggs can be inadvertently harmed or disturbed as a result of many activities, including but not limited to clearing trees and other vegetation. This	1. Provide baseline information on migratory birds that are known or

	6.1.7 – Wildlife and Migratory Birds		<p>the Migratory Birds Convention Act, 1994 (MBCA)). However, additional information is needed to understand the impacts of all phases of the Project on individuals, local and regional populations, and their habitat, and potential residual effects after mitigations have been applied.</p>	<p>inadvertent harming, killing, disturbance or destruction of migratory birds, nests and eggs is prohibited under the <i>Migratory Birds Convention Act</i> (MBCA). Harming individual birds, nests or eggs, can have long-term consequences for migratory bird populations in Canada, especially through the cumulative effects of many different projects or activities.</p> <p>The MBCA and its regulations (<i>Migratory Bird Regulations</i> (MBR 2022)) protect migratory birds and prohibit the disturbance or destruction of migratory bird nests when they contain a viable egg or a migratory bird themselves (young or adult). Schedule 1 of MBR 2022 provides year-round nest protection for 18 species that are known to reuse their nests or whose nests are reused by other species. The legislation and regulations apply to all lands and waters in Canada, regardless of ownership.</p> <p>More information on the MBR 2022 can be found on the ECCC web site: New Migratory Birds Regulations, 2022 - Canada.ca</p> <p>With respect to disturbance or harm to nesting birds, the principal risk factors are location and time of year. The most sensitive period to consider is the breeding season; The active season for migratory birds in this region is generally from mid-April to mid-August, although some species protected under the MBCA do nest outside of this time period.</p> <p>For further details, please refer to the Avoiding Harm to Migratory Birds website at: Guidelines to avoid harm to migratory birds - Canada.ca</p> <p>See Table 2, Comment ECCC-07 for additional clarification and information.</p>	<p>have the potential to occur in the Project Area, including information on annual variation, distribution and habitat use.</p> <ol style="list-style-type: none"> 2. Provide mitigation measures for potential effects to migratory birds and their habitat, including timing restrictions, to address potential impacts from all phases of the Project. 3. Provide information on potential residual effects on migratory birds and their habitat to address potential impacts from all phases of the Project.
ECCC-03	4.4.2.1 – Avifauna Species at Risk	Migratory Birds and Species at Risk	<p>The Initial Project Description briefly describes the pathways of effects and standard mitigations that are expected for species at risk (SAR) or species of conservation concern (SOCC). However, the proponent has not provided adequate information to assess the potential effects to SAR or SOCC, including migratory birds that are also listed on Schedule 1 of the Species at Risk Act or assessed by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC), including any general or species-specific mitigation measures that will be implemented to avoid or minimize potential effects. The proponent has not adequately</p>	<p>Species that are both migratory birds protected under the MBCA and listed on Schedule 1 of SARA as endangered, threatened, or extirpated, receive protections under both MBCA and SARA however, the protection afforded to the species may differ between each Act. For example, under SARA, the protection of residences (e.g., the nests or roosts for most species of migratory birds) may be differently protected under the MBCA. See Protection statement for the habitat to which the Migratory Birds Convention Act, 1994 applies for migratory birds listed under the Species at Risk Act - Document search - Species at risk registry (canada.ca) for more information. Additional information can also be found on the Species at Risk Registry (Species at risk public registry - Canada.ca), particularly more information on residences and other protection requirements.</p>	<ol style="list-style-type: none"> 1. Provide baseline information on species at risk that are known or have the potential to occur in the Project Area, including information on annual variation, distribution and habitat use. 2. Provide information on potential direct and

			<p>described potential residual or cumulative effects of the Project on species at risk.</p>	<p>ECCC recommends the goal of no net loss of biodiversity for all development projects that have the potential to adversely affect biodiversity under their mandate. Conservation allowances or conservation offsets are the final step of the mitigation hierarchy, a three-step approach that first examines options to avoid and minimize potential adverse effects. If the effects on species at risk and their habitat cannot be avoided or the implementation of mitigation measures cannot completely eliminate the impacts, then offsetting should be considered as a last resort. This approach to offsetting is consistent with the application of the mitigation hierarchy to avoid, then minimize, and finally offset for effects that are not mitigated.</p> <p>More information on the mitigation hierarchy can be found here: https://www.canada.ca/en/environment-climate-change/services/sustainable-development/publications/operational-framework-use-conservation-allowances.html</p> <p>See Table 2, Comment ECCC-08 for more information.</p>	<p>indirect effects on species at risk individuals, residences, and habitat.</p> <ol style="list-style-type: none"> 3. Provide mitigation measures for potential effects to species at risk and their habitat, including timing restrictions, to address potential impacts from all phases of the Project. 4. Provide information on potential residual effects on species at risk and their habitat to address potential impacts from all phases of the Project.
ECCC-04	4.4.3.1 - Terrestrial Species at Risk	Species at Risk	<p>Quote (page 105) “<i>During 2023 field program for R12: Environmental Impact Assessment, caribou tracks were observed at six locations in the west end of the LSA (Figure 2.1).</i>”</p> <p>Quote (page 106) “<i>On October 5, 2023, ACI staff met with members of NL Fisheries, Forestry and Agriculture, Wildlife Division regarding the biophysical field programs completed for the Project.</i>”</p> <p>Eastern Migratory Caribou (COSEWIC-assessed as Endangered), particularly individuals from the George River Caribou Herd, may occur in the Project Area. The Eastern Migratory Caribou has been assessed by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) as Endangered since 2017. Consultation by the Minister of Environment is underway to determine whether this species should be listed on Schedule</p>	<p>The Impact Assessment should include information on how the proponent intends to avoid, minimize or mitigate potential direct and indirect effects during all phases of the project as it relates to Eastern Migratory Caribou.</p> <p>Provide an effects assessment that details how Eastern Migratory Caribou may be affected by the Project, including:</p> <ul style="list-style-type: none"> • Eastern Migratory Caribou historical and current occurrence in the Project footprint, including seasonal and annual variations in abundance, distribution and habitat use; • A detailed description of potential direct and indirect effects from Project activities as they relate to Eastern Migratory Caribou; • Measures to avoid, minimize or mitigate potential effects on Eastern Migratory Caribou; and • Follow-up or monitoring programs that will be implemented as it relates to Eastern Migratory Caribou. <p>See Table 2, Comment ECCC-14 for more information.</p>	<p>Provide information on potential pathways of effects to Eastern Migratory Caribou. Include information regarding the measures that will be implemented to avoid, mitigate or offset potential effects, including follow-up monitoring.</p>

			<p>1 of the <i>Species at Risk Act</i> (SARA). If Eastern Migratory Caribou are listed as Threatened or Endangered on Schedule 1 of SARA, a Recovery Strategy will be developed and critical habitat will be identified.</p> <p>The proponent has not included any information on Caribou-related baseline data sources or surveys that will be conducted to provide baseline information on Caribou presence in the Project Area. Additionally, the proponent has not adequately described the potential direct and indirect effects that the Project (e.g., airport, runway, and access road) may have on the Eastern Migratory Caribou population, their habitat and behaviour, (including migration and dispersal) or the measures (mitigations, follow-up monitoring) that will be taken to avoid or lessen potential effects.</p>		
ECCC-05	6.1.5 – Wetlands	Wetlands	<p>Quote (Page 46): <i>“Wetlands within a 100-m buffer of the Runway and Access Road options were confirmed by either classification and functional assessment on the ground or classification and general assessment by helicopter. Wetlands were classified according to the Canadian Wetland Classification System (CWCS) into five classes: bog, fen, swamp, marsh and shallow water...”</i></p> <p>Wetlands provide important nesting, foraging, staging, and overwintering habitat for many species of migratory birds and species at risk (SAR) or species of conservation concern (SOCC), the loss of which may contribute to adverse impacts to species that are protected under the <i>Migratory Birds Convention Act, 1994</i> (MBCA) and/or the <i>Species at Risk Act</i> (SARA). Additional information is required to understand the potential effects to wetlands and wetland functions as it relates to direct or indirect impacts to migratory birds, SAR or SOCC, including mitigations being considered and any residual effects that remain once mitigation measures have been applied that may require offsetting.</p>	<p>The Impact Assessment should include information on how the proponent intends to avoid, minimize or mitigate potential loss of wetlands as it relates to migratory birds, species at risk, or species of conservation concern, including the amount of wetland loss, if any, and any avoidance or mitigation being considered to lessen effects.</p> <p>Provide an effects assessment that details how wetlands may be affected by the Project, including:</p> <ul style="list-style-type: none"> • Identification of wetlands potentially affected by the project (including type, extent and function; figures are recommended); • A detailed description of potential direct and indirect effects from Project activities as they relate to migratory birds, species at risk or species of conservation concern; • Measures to avoid, minimize or mitigate potential effects on wetlands as they relate to migratory birds, species at risk or species of conservation concern; and • Follow-up or monitoring plans, including wetland compensation or offsetting to address the residual loss of wetland habitat and/or function as a result of the Project. <p>ECCC recommends the goal of no net loss of biodiversity for all development projects that have the potential to adversely affect biodiversity under their mandate; wetlands are used as important</p>	<p>Provide a description of any potential direct or indirect effects of the Project activities on wetlands and wetland functions during all Project phases as it relates to migratory birds, species at risk, and species of conservation concern. Include information regarding the amount of wetland loss, if any, and any measures that will be implemented to avoid, mitigate or offset potential effects.</p>

				<p>habitat for migratory birds, SAR and SOCC, the loss of which may contribute to the loss of biodiversity in the Project Area.</p> <p>If the effects on wetlands used by migratory birds, SAR or SOCC cannot be avoided or the implementation of mitigation measures cannot completely eliminate the impacts, then offsetting should be considered as a last resort; the proponent may need to develop a Wetland Compensation Plan that outlines measures to offset the residual loss of wetland habitat and/or function as a result of the Project. This approach to offsetting is consistent with the application of the mitigation hierarchy to avoid, then minimize, and finally offset for effects that are not mitigated.</p> <p>More information can be found at: Operational Framework for Use of Conservation Allowances (publications.gc.ca)</p> <p>See Table 2, Comment ECCC-15 for more information.</p>	
ECCC-06	<p>2.5.3 – Emergency response</p> <p>6.1.7 – Wildlife and Migratory Birds</p>	Migratory Birds and Species at Risk	<p>The Project, as proposed, includes construction of an airport and access road, including the development of a terminal and associated buildings, airstrip and apron, and a new road joining the airport to Nain. The Project also includes the operation of the airport and access road, which will accommodate aircraft, vehicles, and personnel 24/7. As a result, there is potential for adverse environmental effects from accidents or malfunctions, including release of hazardous substances from construction equipment, aircraft, or vehicles. Adverse effects to wildlife, including migratory birds and species at risk, and their habitat could result from the accidental release of hazardous substances (such as hydrocarbons) during Project activities.</p> <p>Potential residual and cumulative effects of accidents and malfunctions (specifically hydrocarbon spills) on migratory birds and species at risk were inadequately described in the Initial Project Description.</p>	<p>Describe the potential impacts of accidents and malfunctions on migratory birds and species at risk, and identify mitigations and response plans to address these potential impacts, including information related to the development of a species Wildlife Response Plan.</p> <p>Section 5(1) of the <i>Migratory Birds Convention Act</i>, 1994 prohibits the deposit of pollution that could be harmful to migratory birds in waters frequented by migratory birds.</p> <p>See Table 2, Comment ECCC-16 for more information.</p>	Provide a description of the Project's environmental risks in relation to accidents and malfunctions, specific to migratory birds and species at risk, and provide information on the measures that will be implemented to prepare for and mitigate these impacts.
ECCC-07	4.5.3 Marine Environment	Marine Environment	The chosen site (#3) includes an access road to the marine environment (Figure 2.1) where a small port/landing facility will be built. Section 2.2.5 describes the use of this access road during construction: "Other	More details are required to evaluate the effectiveness of the proposed methods to characterize baseline conditions in the marine environment.	Provide more detail on how baseline conditions in the marine environment may be characterized.

			<p>materials (for buildings, electricity, drinking water pumping station, water reserves and other Project-related materials) will come from outside the site, mainly by boat to the port of Nain or directly by waterway along the Airport site's coastline." The report stresses the importance of the marine environment in this area: "Due to high amounts of nutrient loading from local rivers, these marine coastal areas have high levels of nearshore marine productivity (Department of Fisheries and Oceans 2021)." However, the report also states that "No field studies of the marine environment were conducted in 2023. The proponent has initiated discussions to access marine data being collected for other initiatives." Without details on the "other initiatives" and no documented plans for field studies in the marine environment, there is uncertainty as to whether baseline conditions in the marine environment can be adequately characterized. This is important in the assessment of potential effects.</p>		
ECCC-08	<p>2.2.7 Site Preparation and Construction</p> <p>4.5.3 Marine Environment</p>	<p>Marine Environment – Fish and Fish Habitat</p>	<p>The chosen site (#3) includes an access road to the marine environment (Figure 2.1) where a site along the coastline may be used to land barges to deliver equipment and materials for construction. Section 2.2.7 describes the use of this access road during construction: "Other materials (for buildings, electricity, drinking water pumping station, water reserves and other Project-related materials) will come from outside the site, mainly by boat to the port of Nain or directly by waterway along the Airport site's coastline." The report stresses the importance of the marine environment in this area: "Due to high amounts of nutrient loading from local rivers, these marine coastal areas have high levels of nearshore marine productivity (Department of Fisheries and Oceans 2021)." However, the report also states that "No field studies of the marine environment were conducted in 2023. The proponent has initiated discussions to access marine data being collected for other initiatives." Without details on the "other initiatives" and no documented plans for field studies in the marine environment, there is uncertainty as to whether baseline conditions in the marine environment can be adequately characterized.</p>	<p>More details are required to evaluate the effectiveness of the proposed methods to characterize baseline conditions in the marine environment. Whether new data are to be collected or sourced from "other initiatives", details may include, but are not limited to:</p> <ul style="list-style-type: none"> - sampling locations - sampling methods and effort - media to be sampled (eg: water, sediment, fish, etc) - guidelines to which sampling will be compared (eg: water quality guidelines, sediment quality guidelines, fish toxicity, etc) - sample timing (eg: seasonal, yearly) and duration (eg: multi-year sampling plan) <p>If data from "other initiatives" are to be used, the original intent of those data, as well as its age, should be considered when evaluating the applicability of those data (eg: historical data may not properly characterize existing conditions). The justification for the use of historical data, and/or data collected for alternative purposes, should be clearly articulated.</p> <p>The characterization of baseline conditions in the marine environment will inform the assessment of potential impacts as well as the development of potential mitigation measures associated with the temporary access road to the coastline.</p>	<p>Provide more detail on how baseline conditions in the marine environment may be characterized.</p>

			This is important in the assessment of potential impacts.		
ECCC-09	6, 6.1.3.1 Water Resources	Freshwater Environment – Fish and Fish Habitat	<p>In Section 6 (Potential Projects Effects and Mitigations), the report states that “information on the existing environment was reviewed during <i>R3: Environmental Review - Desktop Assessment</i> and from field work in 2022.” Although R3 was not included in this review, it was noted that workplans reference freshwater and sediment quality sampling.</p> <p>In section 6.1.3.1 (Key Considerations and Potential Interactions: Water Resources), the report states that baseline data collection and analyses will be conducted as part of the EA:</p> <p>“Water quality (e.g., physicochemical parameters and relevant chemical constituents along with analytical quality baseline characterization, including sampling site selection, monitoring duration and frequency, sampling protocol and analytical protocol – including quality assurance and quality control measures) at various locations, such as the Airport wastewater outlet, water intake and municipal intake.”</p> <p>The report notes the potential for the new airport access road to have as many as 35 stream crossings. While previous and planned studies will characterize hydrological site conditions, it is uncertain if water quality sampling is planned for these stream crossings to establish baseline water quality conditions.</p>	More details are required to evaluate the effectiveness of the proposed methods to assess potential water quality impacts at stream crossings along the airport access road. The proponent’s planned baseline data collection and analyses should reflect how potential impacts to water quality at stream crossings along the airport access road will be assessed.	The proponent should provide more information on the proposed methodology to assess potential impacts on water quality at stream crossings along the airport access road.
ECCC-10	2.2.8 Operations	Freshwater Environment Contaminants of Concern	<p>The Proponent has noted potential de-icing activities related to the project. In section 2.2.6 of the IPD, it is noted “No de-icing facilities are planned as part of the Project.” In section 4.1.2 of the EIS Workplan, a reference is made to the use of de-icing during the operation and maintenance phases including “the operations of the airport (flights in and out) and the access road, and includes maintenance that occurs at the airport and along the access road (including road and runway upkeep, snow clearing, de-icing).</p> <p>More information is required on de-icing activities, including the proposed uses for the runway, aircrafts,</p>	Provide more information on the potential impacts of de-icing activity to the surrounding aquatic environment.	Provide additional details on the proposed de-icing activities and potential impacts to the surrounding freshwater environment. Provide more information on mitigation measures that will be utilized to manage potential impacts to surface water quality.

			and access road, the composition of de-icing substances, and potential impacts to surface water quality.		
ECCC-11	2.3.1.3 Hazardous Materials and Hazardous Waste	Freshwater Environment – Fish and Fish Habitat Contaminants of Concern	<p>The Proponent has noted that “Firefighting foam used at the Airport will not contain Per- and Polyfluoroalkyl Substances.”</p> <p>Per- and polyfluoroalkyl substances (PFAS) are synthetic chemicals, which are a major source of groundwater contamination at airports. PFAS are an environmental concern given their propensity to accumulate in various environmental compartments (e.g. soil, groundwater, surface water) and to bioaccumulate in wildlife tissues. Although the Proponent has suggested using a firefighting foam free of PFAS, more information is required on the composition of the proposed substance and to better understand any potential residual effects of using this alternative firefighting foam.</p>	<p>Include more information about the alternative fluorine free firefighting foam being proposed for use, including more information about the chemical constituents.</p> <p>Provide the necessary studies and/or data, which suggests the alternative fluorine free firefighting foam is a better environmental alternative to traditional AFFFs.</p>	More information is required on the composition of the proposed alternative fluorine free firefighting foam and to better understand any potential residual effects of using this alternative substance.
ECCC-12		Environmental Emergencies	<p>The proposed project includes the construction and operation of a new airport for the community of Nain, NL, as well as an associated ~13 km access road.</p> <p>Airport construction will include a terminal building, 1,830 m runway, maintenance hanger, cold storage building, parking lot, and support facilities including installation of power generation equipment and a wastewater treatment plant. Airport operations will involve storage, handling, and use of hydrocarbons including Jet A and diesel fuel, as well as de-icing fluid and other hazardous materials and wastes. Fuel trucks will be used to transport jet A and diesel fuel from Nain to the airport along the access road.</p> <p>There is potential for adverse environmental effects from accidents and malfunctions related to construction and operation of the airport and access road, such as releases of hydrocarbons or de-icing fluid. Accidental releases of hydrocarbons, de-icing fluid, or other contaminants to the land or surrounding waters could cause adverse impacts to water quality, wildlife, or wildlife habitat.</p>	<p>Optimized spill prevention, preparedness and response measures and systems will be important during construction and operation of the airport and access road, given the risk of spills of hazardous substances to the environment, especially to nearby waterways and environmentally sensitive areas.</p> <p>Part 8 of the <i>Canadian Environmental Protection Act, 1999</i> (CEPA) on environmental emergencies (sections 193 to 205) addresses the prevention of, preparedness for, response to, and recovery from environmental emergencies caused by uncontrolled, unplanned, or accidental releases. It also addresses the reduction of any foreseeable likelihood of releases of toxic or other hazardous substances listed in Schedule 1 of the <i>Environmental Emergency Regulations, 2019</i>. This act may apply if Schedule 1 substances onsite, in the case of this project including Jet A and diesel, meet or exceed the threshold to be regulated under CEPA.</p>	Accidents and malfunctions arising from construction and / or operation of the airport and access road could result in releases of contaminants to the environment. The implementation of spill prevention, preparedness, and response measures and systems will be important to minimize this risk, and should be thoroughly documented in plans.

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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>
<p>ECCC-13</p>	<p>4.4.2 – Avifauna</p> <p>6.1.7 – Wildlife and Migratory Birds</p>	<p>The Project has the potential to directly or indirectly affect migratory birds that use the Project Area for breeding, staging, nesting, roosting, foraging and/or migration. Project activities that may impact migratory birds include but are not limited to:</p> <ul style="list-style-type: none"> • Direct habitat loss (e.g., availability, quality) caused by construction and operation activities; • Indirect habitat loss (e.g., availability, quality) caused by sensory disturbance (e.g., noise, light, and dust emissions); • Increased exposure to contaminants, accidental release of harmful substances (e.g., hydrocarbons, etc.) caused by construction and operation activities; • Increased aircraft and vehicle traffic leading to increased risk of bird collisions, attraction to the Project area, and release of harmful substances. 	<p>Provide recent information on the potential occurrence of migratory birds in the Project Area, including the results of the spring migration and summer bird surveys completed in 2023 and information on fall migrant and wintering birds in the area.</p> <p>Each of the following bird groups should receive a separate description of potential effects and relevant mitigation measures to avoid or minimize these effects:</p> <ul style="list-style-type: none"> • Seabirds • Waterbirds (including shorebirds) • Waterfowl (including sea ducks) • Landbirds (including ground-nesters) 	<ol style="list-style-type: none"> 1. Provide baseline information on migratory birds known to or with the potential to occur in the Project Area, including seasonal and annual variation, distribution and habitat use. 2. Provide a description of the potential Project effects on migratory birds for all phases of the Project. 3. Provide mitigation measures for the Project's potential

		<p>Based on the general Project Area (Nain) and information provided in the Initial Project description, ECCC anticipates that migratory birds, particularly colonial seabirds, waterbirds, ground-nesting landbirds, and waterfowl (including sea ducks), and their habitat, may be impacted during all phases of the Project.</p> <p>The effects assessment should include baseline information on all species of migratory birds that may be impacted by the Project year-round (breeding, fall and spring migration), based on species known to occur in the area (i.e., through desktop/literature reviews and/or survey results), or that are likely to be present in the area based on the habitat types within the Project footprint. The baseline information should be adequately comprehensive to account for seasonal and annual variation.</p>	<p>Describe potential effects (even if minimal) related to the project on individuals, residences, and habitat or provide a detailed rationale as to why there are no anticipated effects.</p> <p>If there is the potential for any effects, describe avoidance and mitigation measures to lessen the effects as well as monitoring measures. Provide information on the potential for residual effects after mitigation has been applied.</p>	<p>effects on migratory birds and their habitat.</p> <p>4. Provide information on the Project's potential residual and cumulative effects on migratory birds and their habitat.</p>
ECCC-14	<p>4.4.2.1 – Avifauna Species at Risk</p> <p>4.4.3.1 - Terrestrial Species at Risk</p> <p>6.1.7 – Wildlife and Migratory Birds</p>	<p>The Project has the potential to directly or indirectly affect species at risk or species of conservation concern, including migratory birds that are also listed on Schedule 1 of the <i>Species at Risk Act</i> or assessed by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC), that use the Project Area for breeding, staging, nesting, roosting, foraging and/or migration, and their habitat. Project activities that may impact species at risk and their habitat include but are not limited to:</p> <ul style="list-style-type: none"> • Direct habitat loss (e.g., availability, quality) caused by construction and operation activities; • Indirect habitat loss (e.g., availability, quality) caused by sensory disturbance (e.g., noise, light, and dust emissions); • Reduction in habitat connectivity caused by physical barriers to movement; • Increased exposure to contaminants, accidental release of harmful substances (e.g., hydrocarbons, etc.) caused by construction and operation activities; and • Increased aircraft and vehicle traffic leading to increased risk of bird collisions, attraction to the Project area, and release of harmful substances. <p>Based on the general Project Area and information provided in the Initial Project description, ECCC anticipates that the following species at risk (SAR) or species of conservation concern (SOCC) may occur within or near the Project Area: Ivory Gull (Schedule 1 SARA, Endangered), Harlequin Duck (Schedule 1 SARA, Special Concern), Short-eared Owl (Schedule 1 of SARA, Special Concern), Rusty Blackbird (Schedule 1 of SARA, Special Concern), Red-necked Phalarope (Schedule 1 of SARA, Special Concern), Little Brown Myotis (Schedule 1 SARA, Endangered), Northern Myotis (Schedule 1 SARA, Endangered), Tri-colored Bat (Schedule 1 SARA, Endangered), Eastern Migratory Caribou (COSEWIC-assessed Endangered). Each SAR or SOCC that may be present in the Project Area and/or impacted by the Project should be considered as a separate Valued Component (VC).</p>	<p>Provide recent information on the potential occurrence of species at risk (SAR) and species of conservation concern (SOCC) in the Project Area, such as a list of species known to occur or with the potential to occur within the Study Area, and a comprehensive habitat assessment to determine whether suitable habitat for SAR and SOCC is present in the Project Area.</p> <p>Describe potential effects (even if minimal) related to the project on individuals, residences, and habitat or provide a detailed rationale as to why there are no anticipated effects.</p> <p>If there is the potential for any effects, describe avoidance and mitigation measures to lessen the effects as well as monitoring measures. Provide information on the potential for residual effects after mitigation has been applied.</p>	<p>1. Provide baseline information on species at risk or species of conservation concern known to or with the potential to occur in the Project Area, including seasonal and annual variation, distribution and habitat use.</p> <p>2. Provide a description of the potential Project effects on species at risk or species of conservation concern for all phases of the Project.</p> <p>3. Provide mitigation measures for the Project's potential effects on species at risk or species of conservation concern and their habitat.</p> <p>Provide information on the Project's potential residual and cumulative effects on species at risk or species of conservation concern and their habitat.</p>

		<p>The effects assessment should include baseline information on all species at risk that may be impacted by the Project year-round based on species known to occur in the area (i.e., through desktop/literature reviews and/or survey results), or that are likely to be present in the area based on the habitat types within the Project footprint. The baseline information should be adequately comprehensive to account for seasonal and annual variation.</p> <p><u>SAR Birds</u> Quote (page 99) <i>“Six avian SAR possibly present in the Nain region include Ivory Gull...the Eastern population of Harlequin Duck, Red-necked Phalarope, Short-eared Owl...Rusty Blackbird...and the anatum/tundrius subspecies of Peregrine Falcon”</i></p> <p>Quote (page 101) <i>“Such habitat exists in the LSA and two rusty blackbirds were detected during the songbird survey in July 2023.”</i></p> <p>The Project has the potential to directly or indirectly affect species at risk or species of conservation concern birds that may use the Project Area for breeding, foraging, staging, migration or overwintering.</p> <p>The proponent noted that none of the species at risk that have the potential to occur in the Project area were observed during the July 2023 surveys, excluding two Rusty Blackbirds. However, without information on the survey methodology used, it is difficult to determine whether the survey was adequate to capture annual and seasonal variation in SAR bird presence and abundance in the Project Area. The proponent should provide a comprehensive baseline summary of all SAR birds that occur or may occur in the Project area.</p> <p><u>Eastern Migratory Caribou</u> Quote (page 104-105) <i>“Caribou have declined in recent years and residents indicate they have no seen caribou around Nain in more than a decade (G. Dicker 2019 pers.comm. In R3: Environment Review – Desktop Assessment). During 2023 field program for R12: Environmental Impact Assessment, caribou tracks were observed at six locations in the west end of the LSA (Figure 2.1).”</i></p> <p>The Project has the potential to directly or indirectly affect Eastern Migratory Caribou, particularly the George River Caribou herd, that use the Project area for breeding, foraging, migration, calving, and overwintering.</p> <p>The proponent has not provided results of the terrestrial SAR survey and has not completed an Eastern Migratory Caribou habitat assessment to determine whether suitable habitat for EMC is present in the Project area. The proponent should provide a comprehensive baseline summary (including annual and seasonal variation) for Eastern Migratory Caribou in the Project Area.</p>		
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ECCC-15	4.4.1 – Vegetation and Wetlands 6.1.5 – Wetlands	Quote (Page 46): “Wetlands within a 100-m buffer of the Runway and Access Road options were confirmed by either classification and functional assessment on the ground or classification and general assessment by helicopter. Wetlands were classified according to the Canadian Wetland Classification System (CWCS) into five classes: bog, fen, swamp, marsh and shallow water...” <p>As indicated in Figure 4.1, the proposed Project activities occurring at the airport site and along the access road will impact wetlands. However, the results of the wetland classification exercise completed in 2023 are not presented in the Initial Project Description. Additional information, including wetland classification and functional assessment, is required to understand the potential effects to wetlands and wetland functions as it relates to migratory birds, species at risk and species of conservation concern. Additionally, a description related to mitigations being considered, and any residual effects that remain once mitigation measures have been applied that may require offsetting has not been provided to date.</p> <p>The effects assessment should include how the proponent intends to avoid, minimize or mitigate potential loss of wetlands as it relates to migratory birds, species at risk and species of special concern. Where avoidance or minimization is not possible, the proponent may need to develop a Wetland Compensation Plan that outlines measures to offset the residual loss of wetland habitat and/or function as a result of the Project.</p>	Provide an effects assessment that details how wetlands may be affected by the Project, including: <ul style="list-style-type: none"> ● Identification of wetlands potentially affected by the project (including type and extent; figures are recommended); ● A detailed description of potential direct and indirect effects from Project activities as they relate to migratory birds, species at risk or species of conservation concern; ● Measures to avoid, minimize or mitigate potential effects on wetlands as they relate to migratory birds, species at risk or species of conservation concern; and ● Follow-up or monitoring plans, including wetland compensation or offsetting to address the residual loss of wetland habitat and/or function as a result of the Project. 	<ol style="list-style-type: none"> 1. Provide baseline information about wetlands in the Project footprint, including type, extent and function. 2. Describe potential direct and indirect effects on wetlands and wetlands functions as it relates to migratory birds, species at risk and species of conservation concern during all project phases. 3. Provide information on mitigation measures, including offsetting, where applicable, for potential effects to wetlands and wetland functions as it relates to migratory birds, species at risk, and species of conservation concern.

				<ul style="list-style-type: none"> Provide information on the potential and residual effects on wetland functions during all project phases as it relates to migratory birds, species at risk, and species of conservation concern.
ECCC-16	2.5.3 – Emergency response 6.1.7 – Wildlife and Migratory Birds	<p>Migratory birds and species at risk may be particularly vulnerable to accidental releases of hazardous substances (such as hydrocarbons).</p> <p>While the proponent has committed to developing an Emergency Response Plan (ERP) that includes a Spill Prevention and Response Plan, the Initial Project Description lacks information on the potential impacts of accidents and malfunctions on the valued components, particularly migratory birds and species at risk, during construction and operation phases.</p>	ECCC recommends that the proponent include a section in the Impact Assessment on the potential impacts of accidents and malfunctions on the valued components, with information on proposed mitigation measures, relevant management plans, including Wildlife Response Plans, and residual effects, during all phases of the project.	<ol style="list-style-type: none"> Provide information on the potential effects of accidents and malfunctions on the valued components and include detailed information on the measures to prepare for, prevent and minimize these effects. <ul style="list-style-type: none"> Provide information on emergency response plans, including considerations for Wildlife Response.
ECCC-17	Section 2.3.2.3 Greenhouse Gases	The proponent notes that “The GHGs assessed for the Project are methane and nitrous oxide, based on expected construction and operation activities as detailed below...”. Based on the emission sources listed, and further details provided in Appendix B, CO2 emissions would also be produced by the project.	For accuracy, ECCC suggests that CO2 be noted as a GHG assessed for the project.	The proponent should add CO2 to the Section 2.3.2.3 list of GHGs assessed for the project.
ECCC-18	Appendix B Section 2.2	The Proponent has stated “Decommissioning emissions are assumed for the purpose of this assessment to be one-half of airport construction emissions (6, 373 tCO2 eq), as the access road is not reclaimed.” The reasoning for this assumption is not clearly stated.	ECCC requests further information on how the proponent determined that decommissioning emissions will be half of the construction emissions.	The proponent should explain how the decommissioning emissions assumption was made.
ECCC-19	Appendix B Section 2.2 Table 2-4	Emissions estimates for the construction and decommissioning phases of the project are provided as total tCO2-eq per phase, rather than annually.	To meet the requirements of Section 4.1.1 of the Strategic Assessment of Climate Change, GHG emissions should be estimated annually and for each phase. The proponent should note that any exclusions identified in Appendix B Section 2.6 should be based on sources that contribute less than 1% to the annual emissions, not the total emissions.	The proponent should provide annual GHG emissions estimates.

ECCC-20	Appendix B Section 2.9	The proponent identified that “The development of a temporary construction camp was not included in this assessment due to the lack of available data”.	For completeness, the emissions associated with the temporary construction camp should be included in the Impact Statement, should one be required.	The proponent should include GHG emissions related to the temporary construction camp in the Impact Statement.
ECCC-21	4. Biophysical Environment, 4.1 Climate and Atmosphere, Table 4.2 (and text)	Incorrect weather station owner/operator information is presented– a station is indicated as being operated by ECCC when the operator is Nav Canada. Stations operated by Nav Canada use different types of weather sensors and observing methods.	Correct the station operator (from ECCC to Nav Canada) for the following station, Nain A, climate ID: 8502801. Note Nain A climate ID 8502801 is a part-time staffed station so daily data are not available, although daily snowfall amounts can be derived from snowfall measurements included in the hourly aviation reports (contact ECCC Climate Atlantic for more information). Other stations with daily data are available.	One of the weather stations used for weather data is incorrectly identified as being operated by ECCC when the operator is Nav Canada.
ECCC-22	4. Biophysical Environment, 4.1 Climate and Atmosphere, Table 4.1	New 1991-2020 climate normals for Nain are now available (although not for rainfall or snowfall), to complement the 1981-2010 climate normals for Nain, used in the study. Climate statistics based on the most recent 30 years are important to consider given the changing climate, and could have an impact on hydrology. An increase in the annual average of daily average temperature is shown in the three most recent sets of climate normals for Nain: -2.2 C (1991-2020), -2.5 C (1981-2010) and -3.0 C (1971-2000).	Include and consider the new 1991-2020 climate normals for Nain, in addition to the 1981-2010 climate normals.	New 1991-2020 climate normals for Nain are available (although not for rainfall or snowfall), to complement the 1981-2010 climate normals for Nain used in the study. Climate statistics based on the most recent 30 years are important to consider given the changing climate. They could have an impact on hydrology.
ECCC-23	4. Biophysical Environment, 4.1 Climate and Atmosphere, Table 4.2 (and text)	Additional data sources for aviation weather elements, precipitation, and lightning data are available to enhance and complement the existing analysis.	Consider additional data sources including: IEM :: Site Wind Roses (iastate.edu) ; archived cloud layer and ceiling information for the older Nain A station (climate ID 8502800) and cloud layer data for the current Nav Canada Nain A station (climate ID 8502801); climate graphs (prepared by Canadian Meteorological Aviation Centre (CMAC)); historical precipitation based on Canadian Precipitation Analysis (CaPA) and Canadian Lightning Data Network climatology for area. Contact Climate Atlantic for details: Climat Atlantique / Climate Atlantic (ECCC) climatatlantique-climateatlantic@ec.gc.ca	Additional data sources for aviation weather elements (cloud data), precipitation, and lightning data are available to enhance and complement the existing analysis. ECCC Applied Climatology Services (Climate Atlantic) can provide the data and details.

ECCC-24	4. Biophysical Environment, 4.1 Climate and Atmosphere, Table 4.2 (and text)	Archived weather data for two weather stations that are currently operating do not appear to have been used in the study: Nav Canada automatic station Nain A, climate ID 8502810 and ECCC automatic station Nain, climate ID 8502799 . Including data from these stations in the study could help to fill gaps in data coverage. Note: Nav Canada automatic weather stations use a heated tipping bucket rain gauge for precipitation amounts. Amounts can be under-reported in severe cold conditions, more-so than data from the ECCC automatic stations where all-weather precipitation gauges are used (when available).	Using all available data sources and being aware of observational limits can help to reduce uncertainties from gaps in the data due to the extreme climate and remote location (e.g. related to servicing delays).	Using additional weather station data that is available can help to reduce gaps in the data coverage and increase understanding of the climatology for the region.

Please insert additional lines if necessary