

Federal Authority Advice Record (FAAR)

The FAAR must be submitted to the Registry by March 18, 2024.

Summit Lake PG LNG Project – JX LNG Canada Ltd.

Agency File : 005908

Department/Agency	Indigenous Services 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.

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.

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.

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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?

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. As such, Indigenous Services Canada runs several funding programs to serve communities, as well as has some information and/or indicators regarding economic and social conditions in communities located on Indigenous reserve lands.

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

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 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)?

Please specify if applicable.

ISC does not have any additional knowledge in these aspects.

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.

Indigenous Services Canada

Name of department or agency involved

Jan Triska

Speaker title

March 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
<p>Please present comments by organization and comment number e.g.: IAAC-01</p>	<p>If the comment relates to a specific section of the initial project description, please provide the reference.</p>	<p>Identify valued component(s) or factor to consider—within the mandate of your department or agency—to which the potential effect or issue applies.</p>	<p>Please provide a brief description of the issue and rationale for being a key issue.</p> <p>Include, where relevant:</p> <ul style="list-style-type: none"> the sequence of potential effects; the relevant context that specifies why this is a key issue; key uncertainties that should be addressed in the impact assessment; Indigenous or public concerns or perspective; scientific data or traditional knowledge, including from previous projects, that justifies the inclusion of the key issue in the project assessment. 	<p>If applicable, please provide brief solutions/advice to address the issue or potential effect, including:</p> <ul style="list-style-type: none"> studies or information relevant to describing and characterizing the potential effect, including any guidance for data collection or analysis or existing data sources to inform the assessment; any powers your department or agency has that may mitigate, manage or set conditions related to the issue; advice or policies to frame and mitigate the potential effect; standardized mitigation or monitoring measures that could manage potential effects, including follow-up on monitoring activities; Commitments the proponent could make to respond to the issue. 	<p>For issues to be included in the Summary of Issues, provide a concise, plain language synopsis of the key issue and any questions or directions for the proponent, if applicable.</p>
		<p>Indigenous peoples social and economic conditions</p>	<p>Job creation – The IPD indicates the project will create jobs, and have a significant on-going economic benefit to the local community and local Indigenous groups (Section 2.1). The realization of these benefits depends on numerous factors not yet fully described. For example, there is a need to establish linkages between the expected workforce and the proponent's commitments intended to respond to Indigenous groups stated interests and concerns.</p>	<p>Information requirements to support the assessment of effects to Indigenous peoples social and economic conditions include:</p> <ul style="list-style-type: none"> Baseline studies about the local workforce and related capacity availability and needs in Indigenous communities, including the identification of opportunities and challenges for Indigenous participation in the workforce for the project; 	<p>The distribution of project social and economic benefits, including employment opportunities, to Indigenous communities and community members.</p>

				<ul style="list-style-type: none"> - Assessment of each affected communities' interests, capacity, and needs to ensure benefits from the project are experienced by the community; - Proponent commitments in response to Indigenous groups' stated interests and concerns. <p>This assessment should be undertaken through engagement with affected Indigenous groups.</p> <p>ISC programs may support community and business readiness to pursue and benefit from related economic opportunities.</p>	
		Indigenous peoples social and economic conditions	<p>Workforce – the make-up of the proposed workforce (IPD Section 12.3) will impact potential effects to Indigenous peoples social and economic conditions. The distribution of jobs to members of affected Indigenous communities is addressed in the comment above. The potential need for and influx of a transient workforce is another important variable.,</p> <ul style="list-style-type: none"> - a key potential consideration from Indigenous perspective is the safety of Indigenous communities. In particular, concerns for safety of Indigenous women and girls merit further consideration and need to be clearly addressed, with reference to the recommendations of Canada's national inquiry into MMIWG. - Simultaneously, the project workforce, as forecasted, may have potential effects on the receiving region's infrastructure and services. These potential effects require more detailed consideration. The level of inquiry required will be commensurate with the potential relative 	<p>Information required to support the assessment of effects to Indigenous peoples social and economic conditions include:</p> <ul style="list-style-type: none"> - measures planned by the proponent that would serve in anticipating and mitigating potential concerns around safety, related to the presence of transient workers, particularly the safety of Indigenous women and girls from nearby First Nations. This needs to be grounded in the understanding of the historical context of documented safety risks to Indigenous people and vulnerable groups within their communities, including risks identified in the national inquiry of missing and murdered Indigenous women and girls. - Related to services, baseline studies of economic and social conditions, including services, infrastructure and social support programs existing in the impacted Indigenous communities; identification of potential effects; and mitigation measures as necessary 	The make-up of the forecasted workforce and related concerns regarding community health and safety and capacity of existing community services and infrastructure to accommodate an increase in population.

			pressure added to regional services from the forecasted workforce.		

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>Please identify comments by organization and comment number.</p> <p>e.g. AEIC-01</p>	<p>If the comment is related to a specific section of the Initial Project Description, please provide a reference.</p> <p>You may also choose to copy the relevant text here.</p>	<p>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.</p>	<p>Specify what additional information the proponent could provide in the Detailed Project Description to address the issue, concern or uncertainty, for example:</p> <ul style="list-style-type: none"> • 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 guidance documents. 	<p>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.</p>
ISC-01	Section 12.1, Socio-economic setting (Page 75 to 76)	<p>The section describing the socio-economic conditions and status of the region will need to be significantly more developed for the DPD. Additional information on employment and unemployment rates, major industries active in the area, population statistics, a list of social services/institutions available locally, and also include basic socio-economic data and information about First Nations communities likely affected by the proposed project, would allow for the identification of key pathways of effects and the requests in the Tailored Impact Statement Guidelines commensurate with the potential level of risk or concern. Through the course of the assessment, information on the social and economic conditions, potential effects to these, associated mitigation will be necessary for understanding the projects impacts on Indigenous peoples.</p>	<p>Include the following economic indicators:</p> <ul style="list-style-type: none"> • Employment rates • Unemployment rates • List of major employers/industries active in the project study area, with % of the overall job market indicated • Average yearly income statistics, disaggregated by gender • Relevant employment and income statistics for the potentially affected Indigenous communities, where available 	<p>For the executive summary, include information on social and economic conditions of the region, with key indicators for the socio-economic well-being of the First Nations communities such as employment rates, income levels and types of work available (by sectors or industries).</p>
ISC -02	Section 12.3, Workforce	<p>This section will need to be developed and described in detail, at the DPD stage. Currently, there is only a short paragraph with approximate counts of workforce anticipated in the various project stages. The IPD indicates that Indigenous groups have an interest in benefitting from jobs, training, and business opportunities however the proponent does not indicate their</p>	<p>Information about the overall workforce:</p> <ul style="list-style-type: none"> • Direct jobs created in the construction phase • Full-time equivalent jobs created in the operational phase (when fully built out) 	<p>Information about the overall project work force, with additional information detailing how the project will relate to and affect the economics of the nearby</p>

		<p>intentions in this regard. Further information about the anticipated make-up of the workforce, and proponent actions to support Indigenous employment, will shine light on potential opportunities and challenges for Indigenous communities to benefit from job creation, and the subsequent information requested to support the assessment of effects to social and economic conditions.</p> <p>For the DPD stage, it is standard to include demographic and socio-economic information about the involved First Nations, which enables the analysis of the proposed project's potential effects on employment, services available, infrastructure and the general well-being in these communities.</p>	<ul style="list-style-type: none"> • If feasible, list main job categories • Disclose how many of the construction phase jobs would be staffed by locals, versus jobs going to out-of-province or foreign workers <p>Details linking the local context to the project:</p> <ul style="list-style-type: none"> • The extent to which the local Indigenous workforce can provide workers, including the number of local and regional Indigenous residents with the skills and availability required or could be quickly trained. • In the Proponent's hiring strategy, is there a strategy directed at hiring Indigenous peoples and is there a target percentage for Indigenous peoples? 	<p>Indigenous communities, including local job creation, hiring practices and the proponent's procurement strategy.</p>
ISC-03	Section 8, Indigenous Interest	<p>Section 8, titled "Indigenous Interest" should contain a more detailed account of the potentially affected/involved Indigenous nations, with a list of their respective reserve lands and a description of their governance modes, which will allow for the identification of key pathways of effects on such lands during the assessment of potential project effects (on the land base/land use practices).</p> <p>Demographic information about each community should also be part of the DPD, providing basic data regarding size and the type of socio-economic factors that are present in the communities. Location and reserve land areas of nearby Indigenous groups such as the Lheidli T'enneh, the Macleod Lake Indian Band, Nazko First Nation and others will need to be indicated on maps, with greater detail than what is currently enclosed in the IPD.</p>	<p>For each of the Indigenous groups listed in the document, make sure to include:</p> <ul style="list-style-type: none"> • Population (on and off-reserve) • Demographic statistics • Size of reserve lands areas • Employment statistics • Education levels (where available) • Housing information • Information regarding access to services • Governance mode (Indian Act, First Nations Land Management Act, self-governing, etc) 	<p>Location and size of reserve lands, for each involved Indigenous group.</p> <p>List the demographic and socio-economic information and supporting data, for all the potentially affected Indigenous groups, pertaining to the on-reserve populations, as well as those residing off-reserve.</p> <p>Where available, include information about access to services.</p>
ISC-04	Section 8, Indigenous Interest	<p>The Indigenous Interest section should elaborate, at the DPD stage, on some of the areas of significance for the Indigenous communities, from the perspective of traditional land use.</p> <p>For example, indicate if there are community trap lines near the project area, or if certain streams are considered valuable for fishing, or if there</p>	<p>Additional detail on the location of areas of significance for Indigenous peoples, including maps demonstrating proximity to project components.</p>	<p>The Indigenous Interest section should elaborate, at the DPD stage, on some of the areas of significance for the Indigenous communities, from the perspective</p>

		are areas used for traditional medicinal plant gathering or for cultural purposes.		of traditional land use, and these areas should be mentioned in the executive summary.
ISC-05	Section 6.2, Activities (potentially contributing to Cumulative Effects)	<p>As is, the IPD leaves a lot of aspects of the project construction and related logistics “to be determined”, particularly the logistics of transportation. Based on the following language in Section 6.2, it is not yet clear how the various manufactured products to be used in the LNG facility construction would be transported to the site: “<i>The packaged equipment imported from overseas will be shipped to either Port Prince Rupert or Stewart World Port and then transported via highway 97 to the plant site. Equipment manufactured and materials supplied inside Canada will be transported either by railway to Prince George or by highways to the plant site. In the case of certain urgent parts and materials, they will be transported to Prince George Airport via air parcels.</i>”</p> <p>In order to be able to assess activities potentially contributing to cumulative effects on communities, greater detail is required to understand who will be potentially affected by the increased / type of rail traffic. The effects on transportation infrastructure and traffic levels will be quite different, depending on whether Highway 97 or rail line are used. It would be helpful to further elaborate on this topic in the DPD.</p>	At the DPD stage, describe how traffic levels would be impacted and what additional infrastructure would be required, depending on each transportation scenario, the Highway 97 or the use of rail line. Include a description of the methodology for the modeling of these respective effects, as well as how these would be taken into account in the cumulative effects analysis.	Characterize the basic construction related activities in order so that the assessment of the project’s cumulative effects can be feasibly carried out. This should include the mode of anticipated transportation, and the potential planned upgrades of roads (type of upgrades, length of road upgraded, etc)
ISC-06	Project Components, Section 6.4 (and Table 6-1).	<p>In the table describing project components, there is the following wording about the potential building of a service road: “<i>A new access road is required from Highway 97 to the facility and an existing Forestry Service Road may require upgrading for additional expected traffic.</i>”</p> <p>In order to be able to more fully comprehend the overall project’s potential physical footprint and therefore its potential impacts, it will be helpful to list the length of this access road and a characterization of how the existing FSR would be upgraded (as in potential widening, surface changes, stream crossings, etc). This will, in turn, help in assessing the project’s direct and cumulative effects, including those on Indigenous lands and land use.</p>	Add description of, dimensions of, and the physical characteristics of the potential planned access road, as well as the potential physical upgrades and/or rebuilding of the local forestry service road. Include these dimensions and basic technical specifications in the DPD.	<p>Length of the new access road, plus the road type (surface, etc).</p> <p>Physical characteristics of the upgrades required to the existing Forestry Service Road</p>

ISC-07	Project Components, Section 6.4	Table 6.1, in Section 6.4 of the IPD, describes the rail loading facilities and indicates that the LNG will be shipped to the west coast using existing infrastructure. The IPD briefly mentions potential effects from increased rail traffic but does not extend this analysis to potential effects to Indigenous peoples. In order to scope the assessment of effects appropriately, and ultimately be able to conclude on potential effects of the project to Indigenous peoples, it is necessary to consider whether there are potential effects of increased rail traffic, specifically transporting LNG, on Indigenous peoples.	The DPD should present the proposed rail route(s), including proximity of these routes to Indigenous communities (including reserve lands), and explain potential pathways of effects related to increased rail line use, including effects related to safety and emergencies; if no pathways of effects are anticipated, the DPD should explain why this is the case. The DPD should include a discussion of engagement (completed or planned) with the Indigenous communities potentially affected by increased rail traffic.	Potential effects of increased rail traffic on Indigenous peoples.
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Please insert additional lines if necessary.