

Federal Authority Advice Record (FAAR)**The FAAR must be submitted to the Registry by April 4, 2024**

Cando Sturgeon Rail Terminal West Expansion Project (The Project) – Cando Rail and Terminals Ltd.

Agency File: 87381

Department/Agency	Health Canada
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1. a) Is it probable that your department or agency may be required to exercise a power or perform a duty or function related to the Project to enable it to proceed?

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

Not applicable

- b) Please describe any Indigenous or public consultation that will be undertaken in relation to the exercise of that power, duty or function, including when it would take place.

Not applicable

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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.

As a federal authority, Health Canada will provide specialist or expert information and knowledge in the Department's possession (expertise) to support the assessment of impacts on human health from projects considered individually or cumulatively under the Impact Assessment Act (IAA). It should also be noted that expertise related to assessing human health that is relevant to impact assessment (IA)

may be held by other federal, provincial, and municipal partners, reflecting the shared jurisdiction for environmental and human health within Canada. For example, the Public Health Agency of Canada (PHAC) has expertise in the social determinants of health approach and health equity, and may provide that expertise through Health Canada, upon request from the reviewing body(ies). How the expertise provided by Health Canada and PHAC will be used in the IA process will ultimately be determined by the reviewing body(ies).

Health Canada can provide human health expertise in the following areas:

- Air quality;
- Recreational and drinking water quality;
- Country foods;
- Noise;
- Methodological expertise in human health risk assessment;
- Methodological expertise in conducting health impact assessment;
- Electromagnetic fields;
- Radiological emissions; and
- Public health emergency management of toxic exposure events.

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?

Not applicable

Please specify if applicable.

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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)?

No

Please provide an overview of the information or advice exchanged.

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 applicable.

Please specify if applicable.

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

For each key issue, please:

- describe the effect or the nature of the issue, including any relevant context;
- provide the rationale and/or evidence for why it is a key issue;
- briefly provide solutions to the issue, including information or studies that, if applicable, should be requested to the proponent in the Tailored Impact Statement Guidelines, potential mitigation measures, or regulatory requirements relevant to the issues;
- provide a concise, plain-language summary of the issue for inclusion in the Summary of Issues.

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

Please use Table 1 to answer this question.

Health Canada did not comment on Table 1.

7. If applicable, specify any additional information the proponent could provide in the Detailed Project Description or in its response to the Summary of Issues that:

- would make it possible to verify whether certain minor issues could be addressed and managed by clear measures, existing guidelines, other regulatory processes or other existing tools;
- help the Agency to provide an opinion if an impact assessment is required, or
- would support the tailoring of the Impact Statement Guidelines if the Agency is of the opinion that an impact assessment is required.

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

Please use Table 2 to answer this question.

Health Canada has provided its responses in Table 2.

Joel Kaushansky on behalf of Health
Canada

Name of department or agency involved

Impact Assessment Specialist

Speaker title

April 3, 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
<i>Please present comments by organization and comment number e.g.: IAAC-01</i>	<i>If the comment relates to a specific section of the initial project description, please provide the reference.</i>	<i>Identify valued component(s) or factor to consider—within the mandate of your department or agency—to which the potential effect or issue applies.</i>	<i>Please provide a brief description of the issue and rationale for being a key issue. Include, where relevant:</i> <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 perspective;</i> • <i>scientific data or traditional knowledge, including from previous projects, that justifies the inclusion of the key issue in the project assessment.</i> 	<i>If applicable, please provide brief solutions/advice to address the issue or potential effect, including:</i> <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> 	<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>

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>
HC-01	<p>Initial Project Description (IPD) 1.4 Indigenous Engagement Pdf pg. 21-23</p> <p>5.3 Impact to Indigenous Peoples PDF pg. 67</p>	<p>Responses from some Indigenous groups, including a summary of key issues raised during the consultations to date from each group, that may be affected by the Project are not provided.</p> <p>Table 1-4 of the IPD identifies the 17 Indigenous groups that could potentially be affected by the Project and were contacted by the Proponent. Following Table 1-4, a summary of the consultation interactions and key issues raised by each group is described. However, the responses of only six specific Indigenous communities (Enoch Cree Nation, Ermineskin Cree Nation, Kehewin Cree Nation, Samson Creek Nation, Kelly Lake First Nation, Lac Ste. Anne Metis Community Association) are described. Responses from the remaining 11 Indigenous communities are not listed. The Proponent also summarizes additional comments from Indigenous groups but does not identify which group the feedback originates. Based on the available information, it is unclear whether there are any traditional land resource use activities occurring within the study areas of the Project and whether these could be adversely affected, consequently impacting the health of nearby Indigenous groups.</p>	<p>Health Canada recommends that IAAC request the following information in the Detailed Project Description (DPD):</p> <p>1. Provide a robust description of key issues for each of the 17 Indigenous groups contacted, including whether there are any traditional land resource use activities that occur within the study areas of the Project (i.e., project area, local study area, regional study area) and what information is known about these locations.</p>	<p>Provide individual information from all 17 Indigenous groups regarding the key issues raised during consultations, including whether there are any traditional land resource use activities occurring within the study areas of the Project (i.e., project area, local study area, regional study area).</p>

HC-02	<p>IPD Summary 2.6 Potential Alternatives PDF pg. 34</p> <p>IPD 2.1 Project Purpose and Need PDF pg. 25</p> <p>2.3.3 Project Activities Operation Activities PDF pg. 35</p> <p>2.6 Potential Alternatives PDF pg. 40</p> <p>3.3.1 Health Context PDF pg. 60</p> <p>5.3 Impact to Indigenous Peoples PDF pg. 67</p>	<p>Clarify whether the atmospheric emissions and exposure pathways associated with the Project's proposed transloading of railcars have been included in the Project assessment and conclusions.</p> <p>IPD Section 2.1 indicates that the Cando Sturgeon Rail Terminal West Expansion will offer a variety of services including "...transloading of railcars from various industries". However, this specific service is not described in Section 2.3.3 Project Activities - Operation Activities, and is only mentioned in Table 2-4: Potential Future Infrastructure as a potential activity that is dependent "...on the physical space available and customer demands". It is anticipated that the transloading of railcars will "...be limited to a maximum of four rail cars per day, generating a maximum of 24 truck movements in/out of the facility". Based on the IPD, it is unclear whether the atmospheric emissions (noise, air) and associated exposure pathways have been included in the Project assessment and conclusion that the Project will not have any negative human health effects. Additionally, it is unclear whether the transloading of railcars could be further expanded in the future beyond the description provided in the IPD, and whether a potential worst-case scenario (i.e., maximum number of rail cars/truck movements per day) has been assessed for this outcome.</p>	<p>Health Canada recommends that IAAC request the following information in the DPD:</p> <p>1. Provide information clarifying:</p> <p>a) whether the atmospheric emissions (noise, air) and exposure pathways associated with the Project's proposed transloading of railcars have been included in the Project assessment and conclusion; and,</p> <p>b) whether the transloading of railcars could be further expanded beyond the planned proposal and if a potential worst case scenario (i.e., maximum number of rail cars/truck movements per day) has been assessed for this outcome.</p>	<p>Provide information about whether the atmospheric emissions (air, noise) and exposure pathways associated with the Project's proposed transloading of railcars, which could adversely impact human health, have been considered, as well as the potential of expanding transloading railcar activities.</p>
HC-03	<p>IPD Summary 3.1.3 Proximity to Residents and Communities PDF pg. 38-39</p> <p>IPD 3.1.3 Proximity to Residents and Communities PDF pg. 46</p> <p>3.1.1 Site Maps PDF pg. 43, 46</p> <p>3.3.1 Health Context PDF pg. 60</p> <p>3.2.5.2 Site-Specific Risks and Mitigations PDF pg. 58-59</p> <p>5.3 Impact to Indigenous Peoples PDF pg. 67</p>	<p>There is an absence of detail validating the Summary IPD and IPD's claims that there will be no adverse human health effects on receptors located nearby the Project.</p> <p>According to Section 3.1.3 of the Summary IPD and Section 3.1.3 and 3.1.1 of the IPD, a total of four receptors are located within a 1.5 km radius of the Project (the closest being only 500 metres away) and there is a rural subdivision approximately 2.5 km north of the Project. Notwithstanding their physical proximity to the Project, the IPD states that there will be no adverse human health effects on either Indigenous or non-Indigenous populations caused by Project-related air and noise emissions. Specifically, the IPD states "air contaminant emissions are expected to be negligible, or minimal during all project phases", and "[i]t is not expected that increased noise levels will adversely affect receptors as the overall increase in noise levels over background is expected to be minor". Additionally, the anticipated air emissions during the construction and operation phases are not presented in projected concentrations that could be exposed to humans (e.g., mass per volume of air), nor is information provided regarding how air emissions would be distributed spatially. In order to substantiate these claims, quantitative evidence should be provided.</p>	<p>Health Canada recommends that IAAC request the following information in the DPD:</p> <p>1. Provide quantitative evidence validating the anticipated human health effects regarding air and noise emissions on receptors located nearby the Project.</p>	<p>Provide quantitative evidence supporting the IPD's conclusion that there will be no adverse human health effects on receptors located nearby the Project.</p>

HC-04	<p>IPD 3.2.5.1 Summary of Publicly Available Information PDF pg. 57-58</p> <p>3.2.5.2 Site Specific Risks and Mitigations PDF pg. 58-59</p>	<p>There is uncertainty regarding the ambient air quality criteria and air contaminants cited in the IPD.</p> <p>Section 3.2.5.1 of the IPD indicates that the concentration limits for the four contaminants of concern are based on the Alberta Air Quality Objectives (NO₂, SO₂) and the Canada Wide Standards (PM_{2.5}, O₃). The Canada Wide Standards for PM_{2.5} and O₃ are no longer applicable and have been replaced by the Canadian Ambient Quality Standards (CAAQS) for PM_{2.5} and O₃. Health Canada also notes that when assessing the potential health effects from non-threshold air contaminants (PM_{2.5}, O₃), there is no level below which there is no adverse health effect. Health Canada guidance (Health Canada 2023) recommends that the most stringent ambient air quality criteria should be referenced.</p> <p>Additionally, Section 3.2.5.1 and Section 3.2.5.2 do not include a complete list of chemicals of potential concern (COPCs) that may be emitted during Project activities. For example, total suspended particulates, fine particulates (PM₁₀), carbon monoxide (CO), and any other toxic pollutants. These should be included given their impacts on human health and that they are emitted from, among others, the gasoline and diesel engines of construction equipment, trains, and transportation vehicles.</p>	<p>Health Canada recommends that IAAC request the following information in the DPD:</p> <p>1. Revise section 3.2.5.1 to reference the most stringent and up-to-date federal and provincial air quality criteria, and expand the list COPCs being assessed to include those may be emitted during Project activities from, among others, the gasoline and diesel engines of construction equipment, trains, and transportation vehicles.</p> <p>For more information refer to:</p> <p>Health Canada 2023. <i>Guidance for Evaluating Human Health Impacts in Environmental Assessment: Air Quality</i> https://publications.gc.ca/site/eng/9.802343/publication.html</p>	<p>Use the most stringent and up-to-date federal and provincial ambient air quality criteria, as well as expand the list of COPCs being assessed.</p>
HC-05	<p>IPD 1.1 Project's Name, Type/Sector, and Proposed Location PDF pg. 9 - 11</p> <p>3.2.5.1 Summary of Publicly Available Information PDF pg. 57-58</p> <p>3.2.5.2 Site Specific Risks and Mitigations PDF pg. 58-59</p>	<p>It is unclear whether the Project considered the combined atmospheric emissions (air, noise) of both the existing Cando Sturgeon Rail Terminal and the proposed expansion.</p> <p>The Project is described in Section 1.1 of the IPD as an "...expansion of Cando's existing rail terminal located in Sturgeon County, Alberta" involving "...roughly the same amount of land as the existing rail terminal, essentially doubling the terminal's capacity". Considering the physical proximity of both projects it is unclear whether the atmospheric emissions (air, noise) from the existing Cando Sturgeon Rail Terminal and the Project, during all lifecycle stages (e.g., pre-construction, construction, operation, decommissioning), are considered together or are being treated as separate in the IPD. If the latter, this could result in an underestimation of the Project's true environmental and human health impacts.</p>	<p>Health Canada recommends that IAAC request the following in the DPD:</p> <p>1. Clarify whether the air quality and noise assessments consider the combined emissions of both the existing Cando Sturgeon Rail Terminal and the proposed expansion, including the worst case exposure scenarios for all Project lifecycle stages (e.g., pre-construction, construction, operation, decommissioning). If the IPD does not consider combined emissions, provide an evidence-based rationale explaining this decision.</p>	<p>Provide information detailing how the Project is considering the combined emissions of both the existing Cando Sturgeon Rail Terminal and the proposed expansion.</p>
HC-06	<p>IPD 1.1 Project's Name, Type/Sector, and Proposed Location PDF pg. 11</p> <p>3.2.5.1 Summary of Publicly Available Information PDF pg. 57-58</p> <p>3.2.5.2 Site Specific Risks and Mitigations PDF pg. 58-59</p>	<p>It is unclear whether the Project considered its contributions to cumulative health effects in the region.</p> <p>According to Section 1.1. of the IPD, the Project is to be located "...in the Sturgeon County portion of Alberta's Industrial Heartland, a Designated Industrial Zone", and "[t]he entirety of the region is zoned for heavy industrial land use and offers a concentrated location for chemical, petrochemical, and oil and gas facilities...". Based on available information in the IPD, it is unclear whether the Project considered its contributions to cumulative health effects in the region.</p>	<p>Health Canada recommends that IAAC request the following in the DPD:</p> <p>1. Provide information on the plans to assess the potential cumulative environmental, social, and economic effects of existing and future projects within the vicinity of the Project and their potential to collectively impact human health for the identified receptors.</p>	<p>Provide information on plans for the Project to assess its contributions to cumulative health effects in the region.</p>