

**Federal Authority Advice Record (FAAR)**

**FAAR Response must be submitted by August 14, 2024**

Black Bear Power Plant Project – Kiwetinohk Energy Corp.

Registry File: 88747

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.

**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.**

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

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

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2. Is your department or agency in possession of specialist or expert information or knowledge in its area of expertise that may be relevant to the conduct of an impact assessment of the project?

**Yes**

Specify the specialist or expert information or knowledge.

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

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

The mandate of the First Nations and Inuit Health Branch (FNIHB) of Indigenous Services Canada is to ensure the availability of, or access to, health services for First Nations on-reserve and Inuit communities; to help First Nations and Inuit communities overcome health barriers and disease threats, and achieve levels of health comparable to other Canadians living in similar locations; and to build strong partnerships with First Nations and Inuit to improve health services. FNIHB works with a wide range of programs, services and partnership initiatives to improve health outcomes for First Nations and Inuit.

FNIHB provides specialized information and knowledge pertaining to/tailored to on-reserve First Nations and Inuit in Canada, such as:

- the provision of health services;
- community health and wellness programs;
- Determinants of health (such as drinking water quality, food safety/chemical contamination of traditional foods or the perception of contamination, mental health and addictions, language, diet, and cultural identity).

FNIHB may also hold knowledge/information, which would vary from community to community on:

- Community level demographics
- Health status of First Nations
- The state of housing, public facilities and care facilities on reserves including state of food facilities
- Health promotion and disease prevention activities

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3. Has your department or agency considered the project; 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?

Specify.

**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.**

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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)

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.**

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5. Does your department or agency have additional information or knowledge on the project not specified above, including information on the geographic, environmental, economic or social context of the project? (e.g. location of protected or sensitive areas, previous history between local communities and proponent or similar projects, local or regional social or economic concerns)?

Specify as appropriate.

**ISC does not have any additional knowledge in these aspects.**

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6. Based on the mandate and area(s) of expertise of your department or agency, what are the key issues related to the project?

For each key issue:

- Describe the potential effect or the nature of the issue, including any relevant context;
- Provide the rationale and/or evidence for why it is a key issue;
- Provide advice on how to address the issue, including any information or studies that should be required in the Tailored Impact Statement Guidelines, potential mitigation measures, and/or regulatory requirements relevant to the issue;
- Provide a concise, plain-language summary of the issue for inclusion in the Summary of Issues.

The information provided will be considered by the Impact Assessment Agency of Canada (IAAC) and may be used to inform its decision on whether an impact assessment is required and, where appropriate, for next steps in the impact assessment process including to develop project-specific draft Tailored Impact Statement Guidelines.

Please use Table 1 to respond to this question.

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7. Where possible, identify any additional information the proponent could include in the response to the Summary of Issues and, if IAAC requires it, in their Detailed Project Description, that would:

- Give confidence that minor issues or effects could be addressed and managed by clear measures, existing guidelines, other regulatory processes or other existing tools;
- Inform the decision as to whether an impact assessment is required; or
- Aid in tailoring the Tailored Impact Statement Guidelines, if IAAC decides an impact assessment is required.

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

Please use Table 2 to respond to this question.

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Indigenous Services Canada

Name of Departmental / Agency  
Responder

Greg Bosse/Nicole Cerpenjak

Title of Responder

Sr. Environment Officer/Health Impact  
Assessment Coordinator

Date

August 13, 2024

**Table 1: Key Issues to inform the impact assessment process**

The IAAC asks that federal authorities align expert advice with IAAC’s approach to tailoring by project, which focuses on key project issues, clearly focused on the prevention of adverse effects within federal jurisdiction. In identifying key issues, federal authorities should be mindful of the project’s context (size, scope, location), Indigenous Knowledge and perspectives, and public concerns. Key issues that may be relevant to the decision include:

- adverse effects within federal jurisdiction and direct or incidental adverse effects that may be to some extent significant, based on federal experts’ knowledge and experience with past projects;
- potential impacts on Indigenous Peoples and their rights, based on Indigenous Knowledge and perspectives or experience with past projects;
- effects on key species or habitats (e.g. at risk, important to Indigenous communities, commercial importance, provide important ecosystem function);
- issues or effects that may result from novel project activities, components or technology;
- effects with large uncertainties, including in the effectiveness of mitigation measures;
- adverse effects within federal jurisdiction or direct or incidental adverse effects where mitigation measures are limited;
- positive effects, including where project may support other governmental priorities, including reconciliation with Indigenous Peoples; and
- key concerns raised by Indigenous groups or local communities.

Effects that are anticipated to be minor or which can be managed using well understood mitigation, existing guidance, and/or other regulatory processes may have simplified information requirements or may be removed entirely. Measured advice from federal authorities on key issues and solutions —and on the scope and detail of any required information and studies — will enable IAAC to focus assessments on issues that are important to participants and to decision-makers.

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 identify comments by organization and comment number.  e.g.: IAAC-01</i>	<i>If the comment is related to a specific section of the Initial Project Description, please include that 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>Provide a brief description of the issue and rationale for being a key issue.  Include, where relevant,:</i> <ul style="list-style-type: none"> <li>• the pathway of effects;</li> <li>• relevant context on why it is a key issue;</li> <li>• key uncertainties that should be addressed in the impact assessment;</li> <li>• Indigenous or public concerns or perspective;</li> <li>• potential for differential effects among diverse subgroups;</li> <li>• scientific evidence or Indigenous Knowledge, including from past project experience, which supports inclusion as a key issue.</li> </ul>	<i>Where applicable, briefly provide solutions on how to address the potential issue or effects including:</i> <ul style="list-style-type: none"> <li>• Information or studies required to describe and characterize the potential effect; including any guidance for data collection and/or analysis or existing data sources to inform the assessment;</li> <li>• Any means, including any powers, duties or functions, that your department or agency has that may mitigate, manage, or set conditions related to the issue or effect;</li> <li>• Guidance or policies for mitigating effects or any standard and well-understood mitigation measures that would address the effect, including follow-up monitoring activities; and/or</li> <li>• Commitments the proponent could make to respond to the issue.</li> </ul> <i>Where available, please refer to existing text in the Tailored Impact Statement Guidelines template.</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.</i>
ISC-FNIHB-AB-01	Section 15, Section 22.1	Human Health, Healthcare Services, Accidents/Malfunctions	The Initial Project Description (IPD) does not anticipate impacts to the health of Indigenous communities. In Section 15 the IPD states: <p>“[...] support staff totaling approximately 30 persons (actual numbers TBD). This is only a net increase of the Big Hills regional population by 0.5%. Therefore, there would be almost no increased pressure for social and medical services, or other local health care service providers.”</p> <p>However, this is only considering the impact of the operational staff, not the staff at peak construction which is anticipated to be over 700 people at peak and an average of 350 people (pg. 162).</p> <p>An accident or malfunction scenario could cause an unpredicted impact to regional health services that may effect Indigenous communities. The proponent should consider these scenarios when determining the potential for an impact to healthcare services.</p>	<ul style="list-style-type: none"> <li>- Recommend that the proponent proactively assess the potential impact of the project on emergency services and healthcare access for Indigenous communities. It is crucial to engage with relevant communities and facilities, including First Nation health centres, to understand their needs.</li> <li>- Recommend that the proponent consider mitigation measures for accident and malfunction scenarios. This includes developing contingency plans, ensuring timely communication, and addressing any unexpected emergencies that may strain existing healthcare resources. It is encouraged that these plans are developed collaboratively with Indigenous communities and health centres.</li> </ul> <p>Recommend the proponent expand upon the potential impact of the project to the health Indigenous Peoples. For example:</p> <ul style="list-style-type: none"> <li>- The cumulative impacts of existing and potential future industrial development and/or resource extraction with the region.</li> </ul>	<ul style="list-style-type: none"> <li>- The project should look at how it might affect emergency services and healthcare for Indigenous communities. It’s important to talk to Indigenous communities and their health centers to understand their needs.</li> <li>- The project should have plans in place for accidents and emergencies. This includes having backup</li> </ul>

			<p>The proponent does not address how this project might contribute to the cumulative impacts of existing projects on the health of Indigenous communities. If there are ongoing projects already affecting these communities, the development of this project could exacerbate existing impacts to Indigenous Peoples' health.</p>		<p>plans, quick communication, and ways to handle unexpected situations that could put pressure on healthcare resources. These plans should be made with input from Indigenous communities and health centres.</p> <ul style="list-style-type: none"> <li>- Information on the potential cumulative impacts to the health of Indigenous communities should be provided.</li> </ul>
ISC-FNIHB-AB-02	Traditional land use Section: 21.2, Section 22,	Traditional land use, hunting, gathering	<p>The IPD varies in its description about the potential traditional land use that occurs on the project site and in the area nearby the project location. The IPD describes the proposed location as adjacent to heavy industrial area but occurs in an area that allows for hunting. Furthermore, in section 22 (pg. 179-180) the IPD states there is limited evidence of plant gathering, with the following paragraph referencing a previous section: "[...] <i>Indigenous Communities have requested to be notified so they can complete harvesting prior to the commencement of construction to mitigate the possibility of removing culturally significant plants.</i>"</p> <p>While there may be little evidence of ongoing traditional land use, additional investigation may be warranted through traditional land use studies to understand the full scope of historical and ongoing traditional land use and the potential impacts the project may have on Indigenous communities.</p>	<ul style="list-style-type: none"> <li>- Provide more detail on land use by Indigenous communities. Consider using a traditional land use study.</li> <li>- Explain how potential changes (consider projected period of time), may affect Indigenous harvesting rights in the area or use of land for cultural purposes.</li> </ul>	<ul style="list-style-type: none"> <li>- Provide more detail on land use by Indigenous communities.</li> <li>- Provide details on how the project may affect Indigenous land use.</li> </ul>
ISC-FNIHB-AB-03	Section 4, Section 21.2	Food Security, Traditional Land Use, Indigenous Engagement	<p>The IPD is unclear about the degree of historical or ongoing traditional land use in the area such as hunting, gathering, subsistence farming, or other activities related to food security. There are some concerns regarding the extent of Indigenous engagement particularly, with communities that have not provided a response, which can not be assumed to be a lack of interest in engagement when there could be a lack of capacity for engagement. Ongoing efforts to engage with communities is encouraged.</p> <p>Despite the absence of known traditional use, the proponent must consider the potential impacts on</p>	<ul style="list-style-type: none"> <li>- Recommend that the proponent further investigates the potential impact of the project on Indigenous Traditional Uses and food security. To fully understand the project's impacts, additional engagement with Indigenous communities is required.</li> <li>- Recommend that the proponent review the food security related conclusions of the First Nations Food Nutrition and Environment Study that took place in Alberta in 2013 <ol style="list-style-type: none"> <li>1. <a href="https://www.fnfnes.ca/docs/ABsummaryofresultshmay2016.pdf">https://www.fnfnes.ca/docs/ABsummaryofresultshmay2016.pdf</a></li> <li>2. <a href="https://www.fnfnes.ca/docs/FNFNES_Alberta_Regional_Report_ENGLISH_2019-10-09.pdf">https://www.fnfnes.ca/docs/FNFNES_Alberta_Regional_Report_ENGLISH_2019-10-09.pdf</a></li> </ol> </li> </ul>	<ul style="list-style-type: none"> <li>- The project should look into how it might affect Indigenous Traditional Uses and food security. To fully understand these impacts, more discussions with Indigenous communities are needed.</li> </ul>

			<p>Indigenous Traditional Uses and the subsequent effects on food security. It is essential to recognize that these project impacts may directly affect the well-being of Indigenous Peoples.</p> <p>It is important for the proponent to recognize that these potential project impacts may affect the food security of Indigenous Peoples. The World Bank defines food security as the state in which all individuals consistently have physical and economic access to sufficient, safe and nutritious food that meets their dietary needs and preferences, promoting an active and healthy life (World Bank, 1996). Food insecurity is a continuing public health challenge effecting Indigenous Peoples (Power, 2008).</p> <p><b>References:</b></p> <ol style="list-style-type: none"> <li>1. Power, E.M. 2008. Conceptualizing Food Security for Aboriginal People in Canada. doi: 10.1007/BF03405452. World Bank. 1996. What is Food Security? Available online: <a href="https://www.worldbank.org/en/topic/agriculture/brief/food-security-update/what-is-food-security">https://www.worldbank.org/en/topic/agriculture/brief/food-security-update/what-is-food-security</a></li> </ol>		<p>- Food security related conclusions of Alberta FNFNES, 2013 should be studied by the proponent to better understand the importance of food security issues affecting Alberta First Nations.</p>
ISC-LEED-01		Cumulative Effects: Impacts to Indigenous Peoples	<p>The IPD states, "Current land use in and immediately adjacent to the BBPP is heavy industrial (i.e. oil and gas, logging, transmission lines) which could suggest limited use and effects on current land use by Indigenous Communities."</p> <p>As the Project area has been subject to disturbances from industry projects and activities, continued industrial development adds to the loss of lands available for Indigenous communities for current and future interests whether for traditional use, economic development, spiritual and cultural purposes, etc. Although this project is not on reserve land, Indigenous communities may experience cumulative effects from the Project.</p>	<p>Cumulative effects assessments are not required at this stage of the IA process and are often necessary to understand the full impacts to Indigenous communities.</p> <p>Continued engagement with potentially impacted First Nations and Métis groups or Métis Settlements such that traditional knowledge and experience can be incorporated into assessment of cumulative effects and inform project development in a sustainable manner.</p>	<p>Traditional knowledge and experiences gathered from continued engagement with First Nations and Métis should be incorporated into cumulative effects assessments and the understanding of potential cumulative impacts to Indigenous peoples.</p>
ISC-LEED-02	14.6.1 – Air Quality	GHG Emissions – Impacts to Indigenous Peoples	<p>The Project has plans to utilize carbon capture and storage however those plans at this time are unclear and therefore the Project should be considered based on the assumption that the Project does not utilize CCS. The proponent has provided the carbon intensity without CCS as 383 tCO<sub>2</sub>/GWh – just under the 420 tCO<sub>2</sub>/GWh allowed under the current limit as per the <i>Regulations Limiting Carbon Dioxide Emissions from Natural Gas-fired Generation of Electricity</i>.</p> <p>Indigenous communities are disproportionately impacted by the effects of climate change</p>	<p>At this stage of the IA process, impacts of the project from GHG emissions or the cumulative effects assessments of these emissions is not specifically required at this stage of the IA process and are often necessary to understand the full impacts to Indigenous communities.</p> <p>Continued engagement with potentially impacted First Nations and Métis groups or Métis Settlements such that traditional knowledge and experience can be incorporated into an assessment the impacts of climate change from GHG emissions in order to inform project development in a sustainable manner.</p>	<p>Indigenous knowledge and experience gathered from continued engagement with First Nations and Métis communities should be incorporated into the understanding of impacts of climate change from GHG emissions on Indigenous peoples and inform sustainable project development.</p>

Please insert additional rows as necessary.

Table 2. Clarifications or additional information the Proponent could include in the response to Summary of Issues

Comment ID	Relevant section of the Initial Project Description	Description of Issue, Concern or Uncertainty	Clarification 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.: IAAC-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 the proponent could address in their response to Summary of Issues and, if IAAC requires it, in their Detailed Project Description that would give confidence that the issue will be addressed and managed, by clear measures, existing guidelines, regulatory processes or other existing tools, and thus be the subject of simplified information requests in the guidelines, or simply be removed.</p>	<p>Provide recommended clarification or additional information to be included in their response to the Summary of Issues and, if IAAC requires it, in their Detailed Project Description to address the issue, concern or uncertainty, for example:</p> <ul style="list-style-type: none"> <li>• Clarifications to elements of the project description (e.g. components, activities, locations or alternatives);</li> <li>• Proposed project design changes that could avoid effects;</li> <li>• Evidence that could be presented to demonstrate there is no effect, pathway of effect or that effects would be negligible;</li> <li>• Evidence that standard mitigations will address potential effects</li> <li>• Commitments the proponent could make to respond to the issue, including the implementation of federal operational policies or guidance documents.</li> </ul>	<p>For issues to be included in the Summary of Issues, provide a concise, plain language synopsis of the issue and of the question or direction for the proponent.</p>
<p>ISC-FNIHB-AB-04</p>	<p>Section 15.2, Section 22.2</p>	<p>The proponent anticipates the project will generate economic benefits for the region through the creation of 700 positions during the construction phase and 30 positions for ongoing operations.</p> <p>However, there are few details on the source of the employment and barriers to the participation of Indigenous communities for these job opportunities. If the construction workers are sourced from outside of the community, it is crucial to address concerns about transient workers. These include an increased demand for services and infrastructure, <a href="#">and violence against Indigenous women and girls</a>.</p> <p>Additionally, the proponent should discuss how the project's economic advantages will be distributed within the local community. This analysis is essential for fostering equitable employment opportunities for Indigenous Peoples, minimizing barriers to participation, and maximizing positive impacts for Indigenous Peoples that may be impacted by the project.</p> <p>Employment is a social determinant of health. When Indigenous Peoples have meaningful employment it can have beneficial impacts to health outcomes, such as access to healthcare, access to appropriate housing, better nutrition, and increased health equity (<a href="#">National Collaborating Centre for Aboriginal Health</a>).</p> <p><b>References:</b></p>	<ul style="list-style-type: none"> <li>- Recommend that the proponent identify and address any barriers that may hinder the active participation of Indigenous communities in project-related employment opportunities and work with those communities to address these barriers. Consider implementing targeted outreach programs, training initiatives, and support services to facilitate increased Indigenous employment.</li> <li>- Recommend the proponent include information in the Detailed Project Description about the temporary workforce, temporary housing, and Indigenous hiring opportunities for the construction and operation of the project.</li> <li>- Recommend that the proponent continue ongoing engagement with the Indigenous communities that may be impacted by the project, to gather feedback on the economic impact of the project. This ensures that the community's and concerns are considered throughout the project's lifecycle.</li> </ul>	<ul style="list-style-type: none"> <li>- Recommendation that the proponent work with Indigenous communities to facilitate job opportunities for Indigenous Peoples. The proponent should continue engagement with Indigenous communities that may be affected by the project throughout the life of the project.</li> <li>- The proponent should include information on where the workforce for the construction and operation of the project will come from.</li> </ul>

		<p>Native Women's Association of Canada. 2018. Indigenous Gender-based Analysis for Informing the Canadian Minerals and Metals Plan.  <a href="https://internationalwim.org/wp-content/uploads/2020/07/indigenous-gender-based-analysis-cmmp_.pdf">https://internationalwim.org/wp-content/uploads/2020/07/indigenous-gender-based-analysis-cmmp_.pdf</a></p> <p>National Collaborating Centre for Aboriginal Health. 2017. Employment as a Social Determinant of First Nations, Inuit, and Métis Health.  <a href="https://www.ccsa-nccah.ca/docs/determinants/FS-Employment-SDOH-2017-EN.pdf">https://www.ccsa-nccah.ca/docs/determinants/FS-Employment-SDOH-2017-EN.pdf</a></p>		
ISC-FNIHB-AB-05	Section 4, Section 15, Section 22	<p>There is a lack of demographic information regarding the identified Indigenous communities that may be impacted by the proposed project. Additional information should be collected and provided to understand the full scope of the impacts to communities. The proponent should include information on population size (e.g., on and off reserve population). In addition, where possible, the proponent should include disaggregated data (e.g., age, sex, gender, level of education, employment by sector).</p>	<ul style="list-style-type: none"> <li>- Recommend that the proponent include demographic information in potentially impacted Indigenous communities. This should include: population size (e.g., on and off reserve) and where possible, the proponent should include disaggregated data (e.g., age, sex, gender, level of education, employment by sector) for the identified Indigenous communities.</li> </ul> <p><b>Resource:</b></p> <p>Crown-Indigenes Relations and Northern Affairs Canada's First Nations Profiles. Available online: <a href="https://fnppn.aadnc-aandc.gc.ca/fnp/Main/Search/FNListGrid.aspx">https://fnppn.aadnc-aandc.gc.ca/fnp/Main/Search/FNListGrid.aspx</a></p>	<ul style="list-style-type: none"> <li>- There is a lack of demographic information on Indigenous communities that may be impacted by the project. The proponent should include information on the population size (e.g., on and off reserve) and where possible, the proponent should include disaggregated data (e.g., age, sex, gender, level of education, employment by sector) for the identified Indigenous communities.</li> </ul>
ISC-LEED-01	Section 9.1 – Infrastructure and Components  Section 4.3 – Overview of Engagement Activities to Date	<p>In the General Information, the Project is described as “the 460MW Black Bear Combined Cycle Power Plant (herein referred to as ‘BBPP’, or the ‘Project’), with a carbon capture plant (CCP)” and describes the project as “carbon capture ready”.</p> <p>Section 9.1.6 describes the processes of the Project and includes, under point 9, the carbon capture system. Section 14.1 indicates that “the carbon capture and storage (CCS) hub, or other party’s hubs, may not be operational when the BBPP is commissioned.”</p> <p>It is not clear if the carbon capture system described in 9.1.6 will operate regardless of the availability of CCS. In the case where the carbon capture system processes still occur, it is not clear what the fate of the captured CO<sub>2</sub> is until CCS is available. Part 11 of the processes indicates that the CO<sub>2</sub> will undergo pipeline transportation but there is not a mention of a CO<sub>2</sub> pipeline in the IPD.</p> <p>Section 9.1.5 includes the Carbon Capture System Hub as one of the Projects components but in Section 4.3 it is stated, “The CO<sub>2</sub> sequestration hub is not part of the BBPP project.”</p>	<ul style="list-style-type: none"> <li>- Provide clarity on whether the carbon capture and storage hub (also referred to as the CO<sub>2</sub> sequestration hub) is or is not part of the Project. If it is not included as Part of the Project, provide clear rationale as to why.</li> </ul> <p>Provide clarity on the processes of the Project that will take place regarding management of CO<sub>2</sub> with and without the carbon capture and storage hub including the fate of CO<sub>2</sub> and if additional pipelines will be required.</p>	<ul style="list-style-type: none"> <li>- Provide clarity on whether the carbon capture and storage hub (also referred to as the CO<sub>2</sub> sequestration hub) is or is not part of the Project and clarity on the processes of the Project that will take place regarding management of CO<sub>2</sub> with and without the carbon capture and storage hub. Include any additional pipelines that may be required for the Project with and without the carbon capture hub.</li> </ul>
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Please insert additional rows as necessary.