

**Federal Authority Advice Record (FAAR)**

October 15, 2024

Rocky Creek Metallurgical Coal Project – CTI Plus Resources Ltd.

Registry File: 88867

Department/Agency	Environment and Climate Change Canada
Lead Contact	Christie Spry
Full Address	101-401 Burrard St. Vancouver, BC V6C 3R2
Email	<a href="mailto:Christie.Spry@ec.gc.ca">Christie.Spry@ec.gc.ca</a>
Telephone	(778) 726-3364
Alternate Contact	Supreet Malhi <a href="mailto:Supreet.Malhi@ec.gc.ca">Supreet.Malhi@ec.gc.ca</a>

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.**

Please note that the following requirements may apply to this project:

***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 (MBCA), 1994* wherever they occur regardless of land tenure. For migratory birds that are listed as Endangered, Threatened or Extirpated on Schedule 1 of the SARA, SARA s.32 (protection of individuals) and s.33 (protection of residences) apply to all land tenure types in Canada. When occupied, i.e., typically during the breeding season, the residences (e.g., nest sites) of all migratory birds listed

as Endangered, Threatened or Extirpated on Schedule 1 of SARA are protected on all land tenure types. For Endangered, Threatened or Extirpated migratory birds that subsequently re-use their residences (e.g., nest sites), the residences are protected under SARA s. 33 year-round.

It is possible that prohibitions may come into force for either migratory birds or other species in the future through orders in Council or other regulatory mechanisms for individuals, residences and 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 may require a SARA permit include:

- Site preparation (clearing, grubbing, site access, staging, blasting);
- Surveys with potential to impact individuals or residences;
- Construction and operation of temporary and permanent works and infrastructure;
- Creation of new roads, rail lines, or power lines; and
- Other activities with potential for injury, mortality, or sensory disturbance impacts (e.g., artificial lighting, flaring, noise, vibration, human activity, vehicle traffic).

Links to publicly available documents:

- Guidelines for permitting under Section 73 of SARA: <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>
- A guide to your responsibilities under the SARA: <https://www.canada.ca/en/environment-climate-change/services/species-risk-education-centre/your-responsibility/your-responsibility-guide.html>

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

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>.

### ***Migratory Birds Convention Act permits***

The MBCA and the *Migratory Birds Regulations, 2022* (MBR, 2022) protect migratory birds and their eggs and prohibit the disturbance, damage, destruction or removal of migratory bird nests when they contain a viable egg or a live bird (young or adult). This legislation and regulations apply to all lands and waters in Canada, regardless of ownership.

For a subset of migratory birds that regularly re-use their nests, their nests are protected year-round. Schedule 1 of the MBR 2022 provides year-round nest protection for 18 species, and nests of these species cannot be damaged, destroyed, removed or disturbed, even when they are unoccupied, unless the following conditions of the regulations have been met:

- a notification of the unoccupied nest has been submitted/received through the Registry for Abandoned Nests and;
- the wait time designated in the regulations has passed, and during this time the nest was not occupied by a migratory bird.

Planning can help to avoid risks of detrimental effects to migratory birds, as the principal risk factors are the location and time of year of activities. For more information on ways to reduce the risk of detrimental effects to migratory birds, their nest and eggs, please visit: <https://www.canada.ca/en/environment-climate-change/services/avoiding-harm-migratory-birds/reduce-risk-migratory-birds.html>.

For more information on permits and the MBR 2022, please visit: <https://www.canada.ca/en/environment-climate-change/services/migratory-game-bird-hunting/status-update-modernization-regulations.html>.

For more information and guidance on general nesting periods, please visit: <https://www.canada.ca/en/environment-climate-change/services/avoiding-harm-migratory-birds/general-nesting-periods/overview.html>.

**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.**

ECCC does not expect to exercise any powers or perform a duty or function under any Act of Parliament in relation to the Project that will involve public and Indigenous consultation.

**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.**

ECCC does not expect to exercise any powers or perform a duty or function under any Act of Parliament in relation to the Project that will involve public and Indigenous consultation.

---

**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?**

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.)

---

## **Specify the specialist or expert information or knowledge.**

**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 measurements and modelling, flooding and extreme events management, drainage control, water levels, site-specific and receiving environment water balances); geochemistry; cumulative effects assessments and follow-up and monitoring as it pertains to fish and fish habitat.

**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; migratory birds, their nests, and eggs, 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, habitat and critical habitat including recovery strategies, action plans and management plans under ECCC's mandate; and ecotoxicology.

**Environmental emergencies:** provide environmental emergency management planning advice and guidance related to potential accidents and malfunctions involving unplanned or uncontrolled releases or spills of hazardous substances into the environment. This includes scenarios where such releases could result in adverse environmental effects within ECCC's mandate, such as impacts on species at risk and migratory birds. Additionally, consider the need for atmospheric transport and dispersion modelling of airborne contaminants, the fate and behaviour of contaminants, and hydrologic trajectory modelling of contaminants in water.

**Climate and meteorology:** long-term climate patterns and norms; marine winds, waves, and weather; and sea ice and icebergs.

### **[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.

---

- 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.**

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

---

- 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.**

Based on information readily available, ECCC has not had any involvement with the proponent or other parties that would be relevant to the assessment of this project.

---

- 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.**

Not at this time.

---

- 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 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.

---

7. Where possible, identify any additional information the proponent could include in their 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.

---

Christie Spry, Environment and  
Climate Change Canada

---

**Name of Departmental / Agency  
Responder**

Senior Environmental Assessment  
Officer

---

**Title of Responder**

October 11, 2024

---

**Date**

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

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
<p>Please identify comments by organization and comment number. e.g.: IAAC-01</p>	<p>If the comment is related to a specific section of the Initial Project Description, please include that 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>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"> <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>	<p>Where applicable, briefly provide solutions on how to address the potential issue or effects including:</p> <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> <p>Where available, please refer to existing text in the Tailored Impact Statement Guidelines template.</p>	<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.</p>
ECCC-01		Air quality – mining	<p>The construction, operation, and decommissioning of mines may result in adverse effects on air quality that could impact human health, Indigenous peoples, and other areas of federal jurisdiction (e.g., water quality. Mining operations, processing, and activities associated with combustion (including transportation) can result in the emission of contaminants such as sulphur oxides (SO<sub>x</sub>), nitrogen oxides</p>	<p>ECCC recommends the following to assess potential impacts to air quality, which may lead to effects within federal jurisdiction:</p> <p>Provide the baseline study on ambient air quality, which identifies and quantifies emission sources for all relevant contaminants.</p> <p>Describe the ambient air quality in the Project’s local and regional study areas and identify existing emissions and sources of contaminants.</p> <p>Describe dust and acid deposits using existing monitoring data. Account for the impact of wildfires on baseline air quality data, if applicable, by referring to the British Columbia active wildfire map available at <a href="https://wildfiresituation.nrs.gov.bc.ca/map">https://wildfiresituation.nrs.gov.bc.ca/map</a>.</p>	<p>Describe the ambient air quality in the Project’s local and regional study areas and identify the existing emissions and sources for all relevant contaminants.</p> <p>Describe the effects on air quality for all relevant phases of the Project.</p>

		<p>(NO<sub>x</sub>), volatile organic compounds (VOCs), and particulate matter (PM<sub>2.5</sub>, PM<sub>10</sub> and TPM).</p> <p>Activities which cause a physical disturbance to land and ore material, such as earth moving, land clearing, blasting, drilling, and transportation, can also introduce particulate matter (e.g., dust and soot) to the surrounding region. The emission of these air contaminants can result in local or regional degradation of ambient air quality, with potential impacts on sensitive ecosystem receptors, Indigenous health, or fish and fish habitat.</p> <p>Furthermore, emissions of air contaminants as a result of this Project may add cumulatively to the emissions from other activities, contributing to degradation of air quality in the region.</p> <p>Projects that involve an increase in rail traffic capacity, projects that will lead to increased rail traffic demand as a direct result of the Project (e.g., mining projects where products are transported by rail), and projects that involve on-road and off-road vehicles and machinery for construction, operation, and decommissioning, or that result in increased road traffic (e.g., hauling material by truck from mine to shipping terminal), have the potential to adversely affect air quality. Specifically, the combustion of fossil fuels can result in the emission of air contaminants such as sulphur oxides (SO<sub>x</sub>), nitrogen oxides (NO<sub>x</sub>), volatile organic compounds (VOCs), and fine particulate matter (PM<sub>2.5</sub>).</p> <p>When contaminants settle out of the air in the surrounding environment, their deposition may result in adverse impacts to terrestrial and aquatic ecosystems. For example, emissions of NO<sub>x</sub> and SO<sub>2</sub> may also lead to</p>	<p>Provide reference concentrations of ambient air contaminants, particularly near key receptors (e.g., communities, traditional land users, wildlife, and vegetation).</p> <p>Consider contaminants, including but not limited to: particulate matter (TSP, PM<sub>2.5</sub>, PM<sub>10</sub>); metals; crystalline silica; CO; nitrogen and sulphur oxides (NO<sub>x</sub>, SO<sub>x</sub>); volatile organic compounds (VOCs); any other products of fossil fuel combustion; and other relevant pollutants from mobile, stationary, and fugitive sources.</p> <p>Compare ambient air quality results with applicable provincial and federal standards.</p> <p>Describe dust and acid deposition using existing long-term monitoring data or new monitoring data collected for at least one year.</p> <p>To assess the effects on the atmospheric environment, provide:</p> <ul style="list-style-type: none"> <li>• a detailed description of all sources of air pollutant emissions;</li> <li>• an inventory and description of activities and all equipment, including the list of on-road and off-road vehicles, etc. (engine type, power, group (Tier 0, 2, 3, or 4));</li> <li>• A comprehensive list of substances and air pollutants that will be generated by the Project as well as their quantification for the entire project life cycle;</li> <li>• A quantification without limitation, the emissions of the following contaminants: particulate matter (TSP, PM<sub>2.5</sub>, PM<sub>10</sub>); nitrogen dioxide and sulphur dioxide (NO<sub>2</sub>, SO<sub>2</sub>); carbon monoxide (CO); volatile organic compounds (VOCs); polycyclic aromatic compounds (PACs), specific aldehydes contained in fuel combustion products (e.g., acetaldehydes, formaldehydes, 1,3-butadiene, acrolein, benzene, diesel particulate matter [DPM], black carbon); and any other relevant air pollutant from mobile, stationary, and fugitive sources.</li> </ul> <p>Evaluate the effects of acidifying emissions on the receiving environment, where applicable.</p> <p>Provide atmospheric dispersion modelling of these contaminants for the construction and operational phases, along with a justification for the chosen dispersion model. Include detailed methodologies and assumptions used to estimate air pollutant emissions and concentrations; all relevant emission factors must be provided and referenced.</p> <p>Provide isoconcentration maps at an appropriate scale representing estimated concentrations and the location of the most sensitive human receptors. Provide a justification of the adoption of all effectiveness control measures used to reduce emission rates from sources in the model, including details of all assumptions related to the associated mitigation measures and their feasibility.</p> <p>To evaluate the effects on the receiving environment, determine the relative contribution of emission sources attributable and non-attributable to the Project concerning pollutant concentrations at key sensitive receptors. To support this analysis, include:</p> <ul style="list-style-type: none"> <li>• the frequency of exceedances during the modelled periods;</li> <li>• A comparison of the predicted levels of air pollutants with the strictest federal (NAAQS) or provincial air quality standards; if applicable,</li> <li>• A comparison with critical thresholds for acidifying emissions;</li> <li>• A comparison of dust deposition while considering ambient deposits.</li> </ul>	<p>Provide a detailed description of all sources of air pollutant emissions.</p> <p>Provide an inventory and description of activities and all equipment.</p> <p>Provide a comprehensive list of substances and air contaminants that will be generated by all components and activities of the Project, as well as their quantification for the construction and operational phases.</p> <p>Provide atmospheric dispersion modelling of air contaminants for the construction and operational phases.</p> <p>Describe the best management practices, mitigation measures, as well as monitoring and follow-up.</p>
--	--	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

			<p>acidification and potential exceedance of ecosystems' critical loads. Air contaminant emissions can result in contamination of nearby land and waterbodies, and may affect sensitive ecosystem receptors.</p>	<p>Recommend that the principles of continuous improvement and the protection of unpolluted regions in the context of airshed and air zone management within the Air Quality Management System are considered within the assessment.</p> <p>Provide an air quality management plan that includes a dust management plan. This should encompass sources of air pollution, common mitigation measures for air contaminants (including a detailed complaint resolution process), the performance effectiveness of air contaminant control devices, best practice programs, as well as monitoring and follow-up.</p>	
ECCC-02		Water quality and quantity - mining	<p>The activities linked to the construction, operation, and decommissioning of mining projects can have adverse effects on the quality of groundwater and surface water, as well as on the hydrological regimes on fish and fish habitat (e.g. watercourses and water bodies).</p> <p>This coal mining project could include the following activities: overburden and topsoil stockpiling, waste rock management, coal process rejects management, coal storage, processing, and handling, constructing haul roads, transporting mined material, constructing and operating water diversions, dam construction, blasting, operating heavy equipment, land clearing, etc. These activities could result in adverse effects to water quality through the release of metals (e.g., mercury), suspended solids, nitrogen-containing contaminants hydrocarbons, and other contaminants (e.g., selenium) to surrounding waters through erosion, sedimentation or runoff processes.</p> <p>Project activities may also produce airborne particulate matter which could also be a source of surface water contamination upon deposition. Contact water (including, but not limited to, wastewater, effluents, runoff, seepage, discharges and spills) contains contaminants that could potentially affect water quality on site and in the receiving environment at all mining stages, including post-closure. Water quality could also be impacted</p>	<p>The activities linked to the construction, operation, and decommissioning of the Project can have adverse effects on the quality and quantity of groundwater and surface water, as well as on the hydrological regimes of watercourses and water bodies.</p> <p>Describe all potential effects, including direct and indirect effects, of project components or activities, including changes to water quality and quantity. Describe mitigation strategies and assess applicability of these strategies to the Project.</p>	<p>The construction, operation, and decommissioning of the Project can have adverse effects on groundwater and surface water.</p> <p>ECCC recommends describing all potential effects, including direct and indirect effects, of project components or activities, including changes to water quality and quantity.</p>

		<p>by other mine-related releases, including sewage, chemicals, and other wastes.</p> <p>Furthermore, the construction, operation, and decommissioning of mines can result in adverse effects on water quality from the potential exposure of acid-generating rock to air and water. Through the natural process of sulphide oxidation, water draining from areas of this exposed rock could acidify the aquatic receiving environment. Interaction between water, air and the exposed acid-generating rock could increase the leaching of metals into the aquatic receiving environment and water body, resulting in adverse effects to water quality.</p> <p>Mining operations can expose rock that contain soluble minerals. When water passes over or through them, these minerals can dissolve in water and result in mineral depositions (e.g. calcium carbonate) and highly saline runoff; this runoff could be released to the aquatic receiving environment thereby altering streambed composition and/or salinity levels, which may result in adverse effects to water quality.</p> <p>Surface water quality may also be degraded by interactions between groundwater and surface waters in the Project area.</p> <p>Mining projects may result in adverse effects to surface water quality and quantity by reducing the volume of inflows into nearby lakes and rivers. Surface flows can be altered through mining, site re-contouring, surface water management (e.g., diversions of clean water around project areas), changes in land cover, removal of existing water features within the</p>		
--	--	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--	--

			<p>affected footprint, water demand to support operations, or other means. These adverse effects have the potential to affect the hydraulic conditions within affected watercourses and the channel morphology because of erosion and changes in sediment transport patterns.</p> <p>The “drawdown” of the water table – that is, lowering the elevation of subsurface water – can result from the construction and dewatering of open pits and underground mines. Drawdown can also result from the withdrawal of water from constructed wells for water-intensive operational processes at the mine. Reducing the quantity of surface and groundwater available to recharge surface water bodies could reduce the total volumes of water in nearby lakes or rivers and seasonal low-flows and baseflow in affected watercourses and potentially increase the concentration of contaminants and natural elements in those watercourses and waterbodies and alter the temperature regime at all mining stages, including post-closure.</p> <p>Adverse effects to water quality and quantity could, in turn, result in adverse effects to sensitive ecosystem receptors.</p>		
ECCC-03		Water quality and quantity – linear projects	<p>The activities linked to the construction, operation, and decommissioning of linear projects such as roads, ditches, transmission lines or access roads to support mining activities or transport coal can have adverse effects on the quality of groundwater and surface water, as well as on the hydrological regimes of fish and fish habitat (e.g. watercourses and water bodies).</p> <p>Constructing and maintaining access roads or other linear projects,</p>	<p>The activities linked to the construction, operation, and decommissioning of the Project can have adverse effects on the quality of groundwater and surface water, as well as on the hydrological regimes of watercourses and water bodies.</p> <p>Describe all potential effects, including direct and indirect effects, of project components or activities, including changes to water quality and quantity. Describe mitigation strategies and assess applicability of these strategies to the Project.</p>	<p>The activities linked to the construction, operation, and decommissioning of linear projects can have adverse effects on the quality of groundwater and surface water, as well as on the hydrological regimes of watercourses and water bodies.</p> <p>Adverse effects to water quality could, in turn, result in adverse effects to sensitive ecosystem receptors.</p>

		<p>excavating or reworking of soils, sediments or rocks constructing watercourse crossings, and drilling and blasting may result in the deposit of contaminants to watercourses and water bodies and result in adverse effects on water quality.</p> <p>Disturbing soils, rock, and streambanks during construction activities may cause erosion and result in deposition of soils and sediments to watercourses and waterbodies. Soils and sediments can also enter watercourses and waterbodies through streambed disturbance. These suspended solids can have adverse effects on water quality.</p> <p>Disturbing soil and rock may also result in processes such as acid rock drainage, or metal leaching, which has adverse effects on water quality due to acidification and introduction of metal contaminants into the watercourses and waterbodies.</p> <p>The deposition of airborne particulate matter generated by the project could also be a source of surface water contamination.</p> <p>Water impoundment or water withdrawals and other disturbances to the natural flow of surface water (for example, watercourse crossings) could have adverse effects on the quantity, availability and hydrological regimes of watercourses and waterbodies. Significant alterations to land cover during construction and over the course of operation can result in a reduction in water infiltration to groundwater reserves and an increase in surface water runoff. The alteration of landcover can also greatly compress the timing of runoff events and alter the natural hydrograph (e.g., range of seasonal and/or inter-annual flow</p>		
--	--	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--	--

			<p>variation) of watercourses. These adverse effects have the potential to affect the hydraulic conditions within affected watercourses and the channel morphology because of erosion and changes in sediment transport patterns.</p> <p>These adverse effects to water quality could, in turn, result in adverse effects to sensitive ecosystem receptors.</p>		
ECCC-04		Species at risk and their habitat	<p>The activities linked to the construction, operation, and decommissioning of a mine and associated infrastructure could have negative effects on species at risk (e.g., amphibians, arthropods, birds, terrestrial mammals, reptiles, etc.) listed under the <i>Species At Risk Act</i> (SARA), and their habitat and critical habitat.</p> <p>The nature of effects can vary based on several factors, including:</p> <ul style="list-style-type: none"> <li>• Project location, duration, scale, and configuration;</li> <li>• Ancillary project activities (e.g., land clearing);</li> <li>• Existing cumulative effects; the type of habitat that may be disturbed; and</li> <li>• Sensitivity of species found in the Project area.</li> </ul> <p>The Project may result in the loss, fragmentation, and/or alteration of habitat, and can negatively impact patterns and behaviours of species at risk, such as reproduction, foraging, staging and migration, and overwintering. Linear disturbance features of the Project may have other negative effects on species at risk, particularly by facilitating the movement of predators in the area, thereby increasing predator abundance, distribution and hunting efficiency or creating connectivity issue within the habitat.</p>	<p>ECCC recommends that the Proponent:</p> <p>Characterize baseline conditions for species at risk by:</p> <ul style="list-style-type: none"> <li>○ Conducting desktop surveys of all available data for the region for species at risk and their habitats (including known habitat features, residences, dens, nests, etc.), citizen science, and provincial and federal datasets; and</li> <li>○ Conducting project-specific baseline surveys and habitat suitability mapping to address any data gaps identified during desktop surveys and to support the assessment of the Project's impacts on species at risk. Surveys should be designed to identify seasonal and annual variation, distribution, and habitat use (requires adequate scope, survey effort, and consideration of locations, etc.) and be in alignment with the best available standards and scientific literature, including, but not limited to those developed by BC's Resource Inventory Standards Committee (RISC) and ECCC.</li> </ul> <ul style="list-style-type: none"> <li>• Assess effects to species at risk and their habitat, including critical habitat, in all assessment areas, including the Project site, local assessment area and regional assessment area.</li> <li>• Describe all potential effects, including direct, indirect and cumulative effects, of the Project on species at risk, including their habitat.</li> <li>• Provide information on how the mitigation hierarchy (i.e., avoid, reduce, offset) was applied. Design mitigation measures and monitoring based on the best available standards, guidelines, best management practices, and scientific literature.</li> <li>• Characterize the Project's residual effects on species at risk.</li> <li>• Offset for the unavoidable loss of habitats that support species at risk.</li> </ul> <p>Please refer to Question 1a) of the FAAR for on the Proponent's responsibilities under the SARA and the potential requirements for permits.</p>	<p>The construction, operation, and decommissioning of the Project can result in adverse effects on species at risk and their habitats.</p> <p>ECCC recommends that the Proponent:</p> <ul style="list-style-type: none"> <li>• Conduct baseline studies to characterize existing conditions for species at risk and inform the effects assessment.</li> <li>• Assess effects to species at risk in all assessment areas, including the Project site, local assessment area and regional assessment area.</li> <li>• Describe all potential effects, including direct, indirect and cumulative effects, of the Project on species at risk, including their habitat.</li> <li>• Design mitigation measures to reduce Project impacts to species at risk that cannot be avoided.</li> <li>• Characterize the Project's residual effects on species at risk.</li> <li>• Offset for the unavoidable loss of</li> </ul>

			<p>The construction of the Project may also increase public access to the region for activities such as hunting or recreation. New road infrastructure or an increase in capacity to existing road networks is predicted to increase vehicle traffic volumes, which is likely to result in an increase in wildlife injury and mortality. Accidental oil or chemical spills could also have adverse effects if these substances make their way into the habitats frequented by species at risk, particularly those habitats that are sensitive to disturbance (e.g., wetlands) or where there is already a high degree of cumulative effects to habitat or individuals. Species at risk could also be affected by sensory disturbances during the construction, operation, and decommissioning of the Project, such noise from various project activities, lights, vibrations from excavation and blasting work and the operation of machinery, as well as the presence of workers. The amount, duration, frequency, and timing of noise are important to understand potential effects. Sensory disturbance may make adjacent habitats unsuitable for use by species at risk and cause avoidance effects in many species.</p> <p>The pathway through which potential effects are conveyed will depend on the land, air, and water constituents associated with the site along with the behavioural adaptability, presence and interaction with the species limiting factor (e.g. habitat supporting staging, nesting, roosting or foraging) and population resilience.</p>		habitats that support species at risk.
ECCC-05		Migratory Birds	<p>Mining projects can result in mortality of individuals and/or the destruction of nests and eggs or any other structure necessary for the reproduction and survival of migratory birds during all</p>	<p>ECCC recommends that the Proponent:</p> <ul style="list-style-type: none"> <li>• Characterize baseline conditions for migratory birds by: <ul style="list-style-type: none"> <li>○ Conducting desktop surveys of all available data for the region for migratory birds, including citizen science and provincial and federal datasets; and</li> </ul> </li> </ul>	The construction, operation, and decommissioning of the Project can result in adverse effects on migratory birds.

			<p>Project phases, but particularly during site preparation, right-of-way maintenance and project dismantling.</p> <p>Mortality in migratory birds could also occur because of collisions with vehicles or infrastructure related to the Project. Accidental oil or chemical spills could also have adverse effects if these substances make their way into the habitats frequented by migratory birds, and there is a higher risk that these effects would be more severe for migratory birds that are also species at risk.</p> <p>Planning can help to avoid risks of detrimental effects to migratory birds, as the principal risk factors are the location and time of year of activities.</p>	<ul style="list-style-type: none"> <li>○ Conducting project-specific baseline surveys to address any data gaps identified during desktop surveys and to support the assessment of the Project's impacts on migratory birds.</li> <li>• Assess effects migratory birds in all assessment areas, including the Project site, local assessment area and regional assessment area.</li> <li>• Describe all potential effects, including direct, indirect and cumulative effects, of the Project on migratory birds. <ul style="list-style-type: none"> <li>○ Provide information on how the mitigation hierarchy (i.e., avoid, reduce, offset) was applied. Design mitigation measures and monitoring based on the best available standards, guidelines, best management practices, and scientific literature.</li> </ul> </li> <li>• Consider the Guidelines to Avoid Harm to Migratory Birds (<a href="https://www.canada.ca/en/environment-climate-change/services/avoiding-harm-migratory-birds/reduce-risk-migratory-birds.html">https://www.canada.ca/en/environment-climate-change/services/avoiding-harm-migratory-birds/reduce-risk-migratory-birds.html</a>).</li> <li>• Characterize the Project's residual effects on migratory birds.</li> </ul>	<p>ECCC recommends that the Proponent:</p> <ul style="list-style-type: none"> <li>• Conduct baseline studies to characterize existing conditions for migratory birds and inform the effects assessment.</li> <li>• Assess effects to migratory birds in all assessment areas, including the Project site, local assessment area and regional assessment area.</li> <li>• Describe all potential effects, including direct, indirect and cumulative effects, of the Project on migratory birds.</li> <li>• Design mitigation measures to reduce Project impacts to migratory birds that cannot be avoided.</li> <li>• Characterize the Project's residual effects on migratory birds.</li> </ul>
ECCC-06		Environmental emergencies - mining	<p>The proposed mining project includes sedimentation ponds, waste rock storage facilities, sewage waste management, fuel storage, explosives storage, and water management structures near a natural stream. As such, there is potential for adverse environmental effects from accidents and malfunctions, such as failure of sedimentation ponds, spills of fuel or wastewater, and the danger of explosions.</p> <p>Therefore, there is potential for adverse environmental and human-health effects from accidents and malfunctions. Adverse effects to air quality, water quality, wildlife and wildlife habitat could result from the accidental release of high concentrations of ammonia,</p>	<p>Optimized prevention, preparedness, and response measures and systems are crucial, especially considering the risks of spills of hazardous substances to water bodies, the terrestrial environment, and uncontrolled releases of explosive gases.</p> <p>The detailed project description should provide adequate analyses of accidents and malfunctions to understand their potential geographical extent, risks, potential consequences, and proposed mitigation measures aimed at minimizing their impact. It is expected that reliable modelling for any contaminants released into the air, spilled on land, and discharged in water will underpin the analysis of each type of incident.</p> <p>The <i>Canadian Environmental Protection Act</i> (CEPA) Part 8 may apply if Schedule 1 substances onsite meet or exceed the regulated threshold.</p> <p>Review and incorporate ECCC's <i>National Wildlife Emergency Response Framework</i>, available at: <a href="https://www.canada.ca/en/services/environment/wildlife-plants-species/national-wildlife-emergency-framework.html">https://www.canada.ca/en/services/environment/wildlife-plants-species/national-wildlife-emergency-framework.html</a>.</p>	<p>Considering the risks of spills of hazardous substances to air, water bodies and the terrestrial environment, prevention, preparedness, and response measures and systems are crucial; therefore proactive spill prevention mitigations should be incorporated into all aspects of the Project (i.e., design, construction, operations and decommissioning).</p>

			hydrocarbons, and other contaminants to surrounding waters.		
ECCC-07		Climate change resilience	<p>As climate over the lifetime of a Project is projected to be different from past and current climate in the area, and the lifetime of the proposed Project is 13-16 years (not including post-closure), climate change considerations are relevant to the Project review. There is potential for climate change to affect the Project which, in turn, may have impacts on the surrounding environment (e.g., through accidents or malfunctions, fish and fish habitat).</p> <p>Climate changes in the Project area, such as possible changes in mean and extreme precipitation and temperature and related environmental conditions, may alter baseline conditions, with implications for climate sensitive aspects of Project design and associated effects on the environment.</p>	<p>The SACC provides guidance related to climate change throughout the impact assessment process. The SACC outlines information that the Proponent should provide during the impact assessment process related to climate change resilience. More details are provided in the “<i>Draft technical guide related to the Strategic Assessment of Climate Change: Assessing climate change resilience</i>” published in March 2022.</p> <p><b>References:</b></p> <p>Strategic Assessment of Climate Change: <a href="https://www.strategicassessmentclimatechange.ca">https://www.strategicassessmentclimatechange.ca</a></p> <p>Draft technical guide related to the Strategic Assessment of Climate Change- Assessing climate change resilience: <a href="https://www.strategicassessmentclimatechange.ca/28896/widgets/117114/documents/77106">https://www.strategicassessmentclimatechange.ca/28896/widgets/117114/documents/77106</a></p>	The Project’s resilience to future climate change should be described and, where relevant, considered in Project design.
ECCC-08		Greenhouse gas emissions and climate change	<p>Mining activities have the potential to produce GHG emissions. A variety of technologies and best practices can be implemented to reduce these emissions, particularly for new, greenfield projects.</p> <p>Climate change, GHG emissions, and impact on carbon sinks are all relevant to the Project review.</p>	<p>Should a federal impact assessment occur, to support the determination of the extent to which the effects of the project contribute to the Government of Canada’s ability to meet its environmental objectives and its commitments in respect of climate change, the assessment should describe all potential effects, including direct and indirect effects of Project components or activities, on GHG emissions. It should also describe mitigation strategies and assess applicability of these strategies to the Project.</p> <p>Future Project documents should include the following wording in italics:  <i>The <a href="#">Strategic Assessment of Climate Change (SACC)</a> (revised in October 2020) provides guidance related to climate change throughout the impact assessment process. The SACC outlines information that the proponent should provide during the impact assessment process on GHG emissions, impact of the Project on carbon sinks, impact of the Project on federal emissions reduction efforts and on global GHG emissions, GHG mitigation measures and climate change resilience; the circumstances in which an upstream GHG assessment would be required; and the circumstances in which a credible plan to achieve net-zero emissions by 2050 will be required.</i></p> <p>More details are provided in the <a href="#">draft Technical Guide Related to the Strategic Assessment of Climate Change: Guidance on quantification of net GHG emissions, impact on carbon sinks, mitigation measures, net-zero plan and upstream GHG assessment</a> published in August 2021.</p>	Include the wording indicated in the previous column.

**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>
ECCC-09	4.5.1.1 QUANTIFICATION OF NET GREENHOUSE GAS EMISSIONS	<p>The Proponent discusses carbon sinks in the same context as land-use change. Land-use change (tonnes of CO2 equivalent) is considered as part of the net GHG emissions calculation, while carbon sinks should be evaluated in a separate section. Carbon sinks are the ability of a forest, ocean or other natural environment to absorb carbon dioxide from the atmosphere, and are not considered a “GHG emission” that would be included in the net GHG emissions calculations. According to the SACC, proponents will calculate the lost carbon sink capacity measured as carbon emissions or removals (tonnes of carbon, rather than tonnes of CO2 equivalent that is used for land-use change).</p>	<p>The Proponent should evaluate the Project’s impacts on carbon sinks in a section distinct from the net GHG calculation. This carbon sink evaluation should include:</p> <ul style="list-style-type: none"> <li>• A description of the activities that would result in an impact on carbon sinks; and</li> <li>• Land areas expected to be impacted by the Project, by ecosystem type (forests, cropland, grassland, wetlands, built-up land) over the course of the Project lifetime, including any areas of restored or reclaimed ecosystems</li> </ul>	<p>The Proponent should evaluate the Project’s impacts on carbon sinks in a section distinct from the net GHG calculation.</p>
ECCC-10	4.5.1.1 QUANTIFICATION OF NET GREENHOUSE GAS EMISSIONS	<p>The Proponent did not quantify the GHG emissions from land-use change, stating they do not currently have enough information on the expected changes in land use. Since the Project will have an estimated footprint of 1,235 ha (Table 4.1-1), the GHG emissions from land-use change must be considered.</p>	<p>The Proponent should include the emissions from land-use change. The GHG emissions and removals from land-use conversions as a direct result of project construction and operations should be included in the direct GHG emissions. Note that this does not include forgone carbon sequestration from land-use change that should be included in the ‘Carbon Sinks’ quantification.</p>	<p>The Proponent should include the emissions from land-use change for construction and operations.</p>
ECCC-11	4.5.1.1 QUANTIFICATION OF NET GREENHOUSE GAS EMISSIONS	<p>The Proponent did not quantify the net GHG emissions for the construction or decommissioning phases.</p>	<p>The Proponent should include a GHG emissions estimate for all Project phases to align with the <i>Information and Time Management Regulations</i>. The net GHG emissions estimate should include, at a minimum:</p> <ul style="list-style-type: none"> <li>• An estimate of the maximum annual net GHG emissions for each phase of the Project, including a breakdown of each term of Equation 1 of the <a href="#">Strategic Assessment of Climate Change</a>, based on the information available in the Planning Phase.</li> <li>• A description of the methodology, data, emission factors and assumptions used.</li> </ul> <p>Any available additional information outlined in section 2.4 of the <a href="#">Draft Technical Guide Related to the Strategic Assessment of Climate Change: Guidance on quantification of net GHG emissions</a>.</p>	<p>The Proponent should include a GHG emissions estimate for all project phases.</p>

			<a href="#">impact on carbon sinks, mitigation measures, net-zero plan and upstream GHG assessment</a>	
ECCC-12		The information presented is not sufficiently detailed to assess the effects, nor the significance of potential impacts to air quality from various activities during both the construction and operational phases.	The Proponent provided high-level information regarding activities, mitigation measures, and nearby indigenous communities (distances from proposed Project). However, there is insufficient information on emission sources for all relevant phases, including those from the Coal Handling and Processing Plant (CHPP). Additionally, details on mining and transportation activities, the equipment, on-road and off-road vehicles and machinery to be used, and wind patterns could be provided to better assess potential impacts on air quality.	The Proponent should provide detailed information on Project activities and emission sources for all relevant phases.
ECCC-13	4.5.1.1	Estimated Project emissions for GHGs were provided in Section 4.5.1.1 However, an estimation of air contaminant emissions was not conducted. A similar estimation for air quality contaminants could be carried out, considering that most of the required input information was used for the GHG estimation.	Provide estimated Project emissions for relevant air contaminants for the one year of construction and per year of operations.	The Proponent should provide estimated Project emissions for relevant air contaminants for the one year of construction and per year of operations.