

S2a Federal Authority Advice Record (FAAR)**FAAR Response must be submitted by May 26, 2025**York Factory First Nation Ten Shilling Aerodrome Project – York Factory First Nation
Registry File: 89488

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

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

Not Applicable

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

Not Applicable

- c) Indicate if the power, duty or function will be required **to construct** the project. Please choose from Required, Potential, Likely, Unlikely, or Not Required as appropriate

Not Required

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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.

As federal authority, Health Canada (HC) will provide specialist or expert information and knowledge in the Department's possession (expertise) to support the assessment of impacts on the health of Indigenous peoples, as described in Section 2 of the amended *Impact Assessment Act* (IAA). It should also be noted that expertise related to assessing human health that is relevant to impact assessment (IA)

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

HC can provide human health expertise in the following areas:

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

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.

Not Applicable

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.

No

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.

No

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 e.g. how it falls under an area of federal jurisdiction as defined under the IAA;
- 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.

[Health Canada has not commented in Table 1.](#)

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.
 - Clarify if a federal permit, licence or authorization may be 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.

[Health Canada has provided its responses in Table 2 based on the information available in the Initial Project Description.](#)

[David Kitchen](#)

Name of Departmental / Agency
Responder

[Regional Manager \(MB/SK/NU\)](#)

Title of Responder

[May 26, 2025](#)

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><i>Please identify comments by organization and comment number.</i></p> <p><i>e.g.: IAAC-01</i></p>	<p><i>If the comment is related to a specific section of the Initial Project Description, please include that reference.</i></p>	<p><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></p>	<p><i>Provide a brief description of the issue and rationale for being a key issue.</i></p> <p><i>Include, where relevant,:</i></p> <ul style="list-style-type: none"> • <i>the pathway of effects;</i> • <i>relevant context on why it is a key issue;</i> • <i>key uncertainties that should be addressed in the impact assessment;</i> • <i>Indigenous or public concerns or perspective;</i> • <i>potential for differential effects among diverse subgroups;</i> • <i>scientific evidence or Indigenous Knowledge, including from past project experience, which supports inclusion as a key issue.</i> 	<p><i>Where applicable, briefly provide solutions on how to address the potential issue or effects including:</i></p> <ul style="list-style-type: none"> • <i>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;</i> • <i>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;</i> • <i>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</i> • <i>Commitments the proponent could make to respond to the issue.</i> <p><i>Where available, please refer to existing text in the Tailored Impact Statement Guidelines template.</i></p>	<p><i>For issues to be included in the Summary of Issues, provide a concise, plain language synopsis of the key issue and any questions or directions for the proponent.</i></p>
<p><i>Please insert additional rows as necessary.</i></p>					

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. e.g.: IAAC-01</p>	<p>If the comment is related to a specific section of the Initial Project Description, please provide a reference. 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. Include any uncertainty related to federal permits, licences or authorizations that may be required for the project</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"> • Clarifications to elements of the project description (e.g. components, activities, locations or alternatives); • Proposed project design changes that could avoid effects; • Evidence that could be presented to demonstrate there is no effect pathway of effect or that effects would be negligible; • Evidence that standard mitigations will address potential effects • Commitments the proponent could make to respond to the issue, including the implementation of federal operational policies or guidance documents. • Information needed to clarify whether a federal permit, licence or authorization may be required 	<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>HC-01</p>	<p>Human Health – Traditional Land Use Practices</p> <p>Section 2.3 Indigenous Engagement, pg. 10</p> <p>Section 6.3 Impact to Indigenous Peoples, pg. 36</p>	<p>Continue targeted engagement with relevant Indigenous Nations including members of the York Factory First Nations (YFFN) regarding current or future traditional land uses occurring in the Project area.</p> <p>Section 6.3 states “the lands within proximity to the Project are only utilized by YFFN and know of no other First Nation groups that utilize the Project area for traditional land uses.” However, limited information is provided on current and potential future land use by the YFFN or other Indigenous Nations near the Project area (e.g., traplines, hunting, fishing, and other traditional land uses).</p> <p>Section 2.3 identifies the surrounding Indigenous communities who may have an interest in the Project and were engaged on the Project by the YFFN. The Initial Project Description (IPD) indicated that no in-person or written responses have been received from identified communities to date with comments or concerns regarding the Project or potential traditional land usage in the area. Health Canada (HC) encourages continued attempts at consultation with relevant communities, with targeted inquiries regarding any potential current or future traditional land uses occurring in the Project area.</p>	<p>Health Canada recommends that the Proponent consider the following for future Project documentation:</p> <ol style="list-style-type: none"> 1. Continue engaging with potentially impacted Indigenous communities, and members of the YFFN regarding traditional land use locations or land use activities (e.g., recreational, hunting, trapping, harvesting and ceremonial sites used by human receptors) in the Project area at any given frequency and for all Project phases. 	<p>Continue consultation with members of YFFN and other nearby Indigenous communities regarding current or future traditional land use.</p>

<p>HC-02</p>	<p>Human Health – Air Quality and Noise</p> <p>Section 4.2.6 Air Quality and Noise, pg. 24</p> <p>Section 3.3.1 Proposed New Infrastructure and Project Activities, pg. 12</p> <p>Section 2.2.5 Resident(s) Stakeholder Engagement, pg. 9</p> <p>Section 2.0 General Information, pg. 5</p> <p>Section 3.3.2 Existing Infrastructure, pg. 14</p> <p>Figure 2 Project Location Detail, pg. 7</p> <p>Figure 3 Aerodrome Preliminary Design Layout, pg. 13</p> <p>Section 6.6.1 Air, pg. 37 Section 4.2.6.1 Noise, pg. 24</p>	<p>Assess potential health effects from Project-related air emissions and noise to support a full evaluation of potential health impacts from the Project.</p> <p>The IPD describes the biophysical environment of the Project including air quality and noise (Section 4.2.6), characterizing the Project location as “...<i>entirely remote</i>” (Section 3.3.1) with the closest permanent residents located approximately 120 kms away. However, it also indicates that seasonal residents exist in close proximity, including those present at the seasonal camp located within 190 m of the Project which will house Construction and Operations workers and seasonal traditional land users, staff employed by Parks Canada at the York Factory Historical Site (4.5 kms NE) as well as seasonal staff at the Nanuk Polar Bear Lodge (43 kms NE).</p> <p><u>Potential Impacts to Air Quality</u></p> <p>Section 6.6.1 acknowledges potential Project-related impacts on air quality and provides a brief discussion of contaminants of potential concern (COPCs) from the Construction and Operations phases, including emissions from mobile equipment and aircraft operations (nitrogen oxides) and fugitive dust generation. HC notes that other emissions from heavy equipment can also include fine particulate matter and diesel exhaust which, in addition to nitrogen oxides, are considered non-threshold contaminants. For more information on the adverse health effects associated with air quality contaminants, refer to Health Canada’s <i>Guidance for Evaluating Human Health Effects in Impact Assessment: Air Quality</i> cited in HC-05 below.</p> <p>An assessment of current baseline air quality in the region and modeled predictions for potential Project-related changes in air quality, with comparisons to suitable health-based air quality criteria [e.g., Canadian Ambient Air Quality Standards (CAAQS) or World Health Organization (WHO) Global Air Quality Guidelines] would yield a better estimate of risk to human health.</p> <p>HC acknowledges the proposed mitigations discussed in Section 6.6.1 and recommends adopting best management practices which include all technically and economically feasible mitigation measures to limit negative impacts to air quality.</p> <p><u>Potential Impacts from Noise</u></p> <p>Section 4.2.6.1 describes noise sources from the Project as minimal and coming from aircraft landings, generator use and snow removal equipment. However, these noise sources appear to apply only to the Operations phase, and noise sources from the Construction phase are not discussed. In addition, the IPD does not assess potential health effects from noise.</p>	<p>Health Canada recommends that the Proponent consider the following for future Project documentation:</p> <ol style="list-style-type: none"> 1. Consider all potential sources of air emissions and compare baseline and predicted air quality results for all COPCs to health-based air quality criteria (e.g., CAAQS, WHO). 2. Use as many technically and economically feasible mitigation measures as possible to minimize air pollution and potential adverse human health impacts on nearby human receptors. 3. Discuss potential noise mitigation measures for the Construction and Operations phases of the Project. 4. Develop a communication plan for human receptors located nearby regarding Project-related activities which may result in noise disturbances and develop a complaints resolution process to address potential noise complaints. 	<p>Consider potential risks to human health by assessing baseline and predicted Project-related air quality against appropriate health-based air quality guidelines for Construction and Operations phases.</p> <p>Utilize a best practices approach to minimize air pollution and potential impacts on human health.</p> <p>Consider potential mitigation strategies for noise disturbances associated with the Project.</p> <p>Develop a communication and complaints resolution plan to address potential noise complaints.</p>
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HC-03	<p>Human Health – Accidents and Malfunctions</p> <p>Section 3.3.1 Proposed New Infrastructure and Project Activities, pg. 12</p> <p>Section 4.1.4 Project Proximity to Traditional Indigenous Uses, pg. 17</p>	<p>Describe potential human health risks associated with accident and malfunction scenarios and develop emergency management procedures and communication plans to mitigate risks.</p> <p>Section 3.3.1 notes that while aircraft serving northern locations often carry the fuel supplies required for a full roundtrip, there will also be a dedicated storage area for fuel and other hazardous materials at a site location yet to be determined. The IPD does not contain any discussion regarding potential accident and malfunction scenarios (such as releases or spills), or additional information on associated human health risks. Potential human health risks resulting from an accident or malfunction could include contaminant releases into nearby water bodies or lands where traditional land use practices may be taking place. The development of an emergency management and communication procedure plan is recommended for health to be accounted for during an emergency response scenario.</p>	<p>Health Canada recommends that the Proponent consider the following for future Project documentation:</p> <ol style="list-style-type: none"> 1. Include an assessment of potential human health impacts resulting from accidents and malfunctions (such as emergency releases or other scenarios beyond standard effluent or waste management), including their likelihood and severity, and assess potential impacts to human health at all Project stages. 2. Develop detailed emergency management procedures and communication plans to mitigate potential harm to human health in the event of an accident or malfunction. 	<p>Include a discussion of potential impacts to human health from accident and malfunction scenarios including an emergency management procedure and communication plan.</p>
HC-04	<p>Human Health – Socio-Economic Conditions</p> <p>Section 6.4 Effect to the Health, Social or Economic Conditions of Indigenous Peoples, pg. 36</p>	<p>Consider both positive and negative socio-economic effects when evaluating Project-related impacts on human health.</p> <p>Section 6.4 discusses the potential positive impacts of the Project on the YFFN and surrounding Indigenous communities including job creation, improved access to medical and emergency services, and safer and more reliable transportation to the general area. While HC acknowledges these potential positive Project outcomes, an evaluation of potential negative Project-related impacts should also be considered. Additionally it may be useful to consider impacts from potential changes in activity and /or population in the area resulting from the Project.</p>	<p>Health Canada recommends that the Proponent consider the following for future Project documentation:</p> <ol style="list-style-type: none"> 1. Provide a discussion of both positive and negative potential socio-economic impacts of the Project and how they may have implications for human health. 2. Continue engaging with local Indigenous communities to help gather community-specific views and information on potential socio-economic impacts. 	<p>Include an evaluation of possible negative socio-economic Project effects and how they may impact human health.</p>
HC-05	<p>Human Health - General</p>	<p>HC has published a series of Guidance Documents that provide general guidance on assessing risks to human health from major resource and infrastructure projects in Canada. It presents the principles, current practices, and basic information HC looks for when it reviews environmental impact statement or other reports submitted by Project proponents. These Guidance Documents</p>	<p>Health Canada recommends that the Proponent consider the following for future Project documentation:</p>	

		<p>are available for the benefit of proponents and their consultants to support an efficient and transparent project review process.</p>	<ol style="list-style-type: none"> 1. Guidance for Evaluating Human Health Effects in Impact Assessment: Air Quality 2. Guidance for Evaluating Human Health Effects in Impact Assessment: Noise 3. Guidance for Evaluating Human Health Effects in Impact Assessment: Drinking and Recreational Water Quality 4. Guidance for Evaluating Human Health Effects in Impact Assessment: Country Foods 5. Guidance for Evaluating Human Health Effects in Impact Assessment: Human Health Risk Assessment 6. Interim Guidance: Health Impact Assessment of Designated Projects under the <i>Impact Assessment Act</i> 	
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Please insert additional rows as necessary.