

**Federal Authority Advice Record (FAAR)****FAAR Response must be submitted by August 6, 2025**

Josephburg Condensate Fractionation Project – Keyera Energy Ltd.

Registry File: [89634]

Department/Agency	Health Canada
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1. Will your department or agency exercise a **power, perform a duty or function**, or provide **financial assistance**, related to the project to enable it to be carried out in whole or in part?

As relevant,

- Specify the power, duty or function, or financial assistance, and the likelihood that it will be required to construct the project, based on the Initial Project Description, as either Required, Potential, Likely, Unlikely or Not Required
- Describe any associated Indigenous or public consultation, including timelines
- Describe any associated information requirements (e.g., alternative means assessment, habitat offsetting), and specify those that may be coordinated with the impact assessment process, if an impact assessment is required<sup>1</sup>
- Identify any associated project-specific guidance or issues of which the proponent should be aware, or information the proponent should provide.

Health Canada (HC) will not exercise a power, perform a duty or function, or provide financial assistance related to the Project.

2. **Using Table 1**, identify project- and context- specific **key issues**, based on the expertise within your mandate<sup>2</sup> and the information in your possession, including the Initial Project Description, any exchanges with the proponent or others related to the project and known means to address the effects of the project. For each key issue:

- Specify the key issue (e.g., specific species and location)
- Specify the project component or activity linked to the key issue
- Explain why it's a key issue based on:
  - biophysical effect pathway(s) from the specific project component or activity
  - concern unique to the project or a priority within your mandate
  - the issue being material<sup>3</sup> to decision making under the *Impact Assessment Act*
- Identify how the issue could be resolved, including through means other than an impact assessment
- Identify additional information the proponent could provide including to give confidence on how the issue can be addressed through other means.

[Ayesha Sohail](#)  
[Impact Assessment Specialist](#)

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Name and title of Departmental /  
Agency Responder

<sup>1</sup> The Government of Canada has set a target of five years or less to complete federal impact assessments and related permitting processes for federally designated projects and a three-year target for nuclear project reviews.

<sup>2</sup> Refer to the [Memoranda of Understanding with IAAC](#).

<sup>3</sup> An issue is material to decision making if its analysis is anticipated to affect the conclusions on (1) whether adverse effects within federal jurisdiction or direct and incidental adverse effects (collectively adverse federal effects) are likely not significant, or of low, medium or high significance; (2) appropriate mitigation measures for significant adverse federal effects; or (3) justification in the public interest.

Aug 06, 2025  
Date

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

This table should outline key issues to inform the impact assessment process, including whether an impact assessment is required and, if so, the scope of the assessment and tailoring of the Tailored Impact Statement Guidelines.

Key issues are the major concerns directly related to a project component or activity, the analysis of which is anticipated to be material to decision-making under the *Impact Assessment Act*.

Federal authorities' advice should be guided by the identification and resolution of key issues. If an impact assessment is required, it will be focused on key issues.

Comment ID	a) Key issue	b) Project component or activity	c)(i) Biophysical effect pathway(s)	c)(ii) Concern unique to the project or a priority within your mandate	c)(iii) Material to federal decision-making	d) Means for issue resolution	e) Additional information from the proponent
<p><i>Identify comments by organization and comment number.</i></p> <p>e.g.: IAAC-01</p>	<p><i>Specify the key issue (e.g., specific species and location).</i></p>	<p><i>Identify the project component or activity linked to the key issue.</i></p> <p><i>Be specific about the nature, scale, novelty and complexity or the component or activity.</i></p>	<p><i>Identify the specific biophysical effect pathway between the project component or activity and the affected environmental or human receptor (including Indigenous Peoples).</i></p>	<p><i>Describe why it's a key issue within the mandate of your department or agency, including in terms of priorities of the federal government and in terms of anticipated likelihood, severity or uncertainty of effects.</i></p> <p><i>Identify if the key issue is common for projects of this nature or in this sector, or whether it's unique to this project due to its complexity, size or novelty; a sensitive or rare receiving environment; and/or proximity of sensitive environmental or human receptors (including Indigenous Peoples).</i></p>	<p><i>Describe why the key issue is material to decision-making as either:</i></p> <ul style="list-style-type: none"> <li>• <i>an adverse effect within federal jurisdiction, or a direct or incidental adverse effect, that may be significant based on available evidence including:</i> <ul style="list-style-type: none"> <li>○ <i>federal experts' knowledge and experience with past project assessments;</i></li> <li>○ <i>presence of sensitive species, habitats or human receptors (including Indigenous Peoples);</i></li> <li>○ <i>novel or complex project activities, components or technologies;</i></li> <li>○ <i>high uncertainties in effects or in the effectiveness of mitigation measures;</i></li> <li>○ <i>unknown or unproven mitigation; or</i></li> </ul> </li> <li>• <i>a factor for the justification in the public interest anticipated to be material to decision-making such as a likely positive effect contributing to sustainability, to Canada's environmental obligations or climate change commitments or in supporting governmental priorities, such as reconciliation with Indigenous Peoples.</i></li> </ul>	<p><i>Describe how the key issue could be resolved or addressed by:</i></p> <ul style="list-style-type: none"> <li>• <i>Any means, including powers, duties, functions, frameworks, policies or guidance that your department or agency has;</i></li> <li>• <i>Any means, including powers, duties, functions, frameworks, policies or guidance from another jurisdiction, including the province;</i></li> <li>• <i>Common, proven, well-understood or standard mitigation measures to mitigate the effect or effect pathway(s); or</i></li> <li>• <i>Commitments made by the proponent (e.g., in the Initial Project Description).</i></li> </ul>	<p><i>Describe information the proponent can provide, or commitments the proponent can make, in their Response to the Summary of Issues that would provide confidence that the issue can be resolved by existing means.</i></p> <p><i>Consider whether information, studies, analyses or collaborative work with other authorities would be required to address the issue beyond existing means.</i></p>
<p>HC-01</p>	<p>Potential locations of Indigenous receptors and health effects pathways for impacts of the Project on Indigenous health have not been adequately described.</p>	<p>Sources of project-related emissions during construction and operations are expected to include:</p> <ul style="list-style-type: none"> <li>- air pollutant emissions from combustion of natural gas or diesel fuel; and</li> <li>- noise emissions from operational noise.</li> </ul>	<p>The Project has the potential to impact the health of Indigenous receptors nearby via exposure to contaminants in multiple environmental media during construction and operations.</p>	<p>Under the <i>Impact Assessment Act</i> (IAA), Health Canada (HC) provides expert information and knowledge to support the assessment of impacts on Indigenous health.</p> <p>The Project appears to be standard in size and complexity for the industry and HC does not have knowledge of the receiving</p>	<p>As per <i>Impact Assessment Act</i> Sections 2(e) and 2(f), non-negligible adverse effects on the health of Indigenous peoples related to the Project falls within federal jurisdiction.</p> <p>The initial Project Description (iPD) indicates that the Project is located within Treaty 6 Territory and Otipemisiwak Métis Government District 11. The closest Indigenous communities are Enoch Cree Nation and Alexander First Nation, located 47 and 50km southwest and west of the Project, respectively. The Project is 22km northeast of the City of Edmonton, which houses an urban Indigenous population<sup>4</sup> who may choose to</p>	<p>HC recommends that the Proponent provide a map(s) showing the potential location of Indigenous receptors within and around the Project's footprint, and consider all potential human exposure pathways throughout its lifecycle, including information on contaminants of potential concern (CoPCs), contaminant sources, release mechanisms, transport mechanisms within and between relevant environmental media, points of exposure (receptor locations), and exposure routes.</p>	<p>The Proponent is encouraged to provide a map(s) showing the potential locations for Indigenous receptors, including cabin or traditional land use locations. The characterization of potential receptors would typically include the distance to the project's footprint, the local study area (LAA), Regional Study Area (RSA) for each</p>

<sup>4</sup> [Focus on Geography Series, 2021 Census - Edmonton \(Census subdivision\)](#)

				<p>environment being sensitive or rare.</p> <p>HC recommends that conceptual health effect pathways be identified as early as possible in project planning, as they will provide information on potential impacts on the health conditions of Indigenous Peoples from Project-related changes in environmental, social, and economic conditions.</p> <p>Further engagement with Indigenous Peoples may help determine Indigenous receptor locations, and the value of the surrounding environment for historical, present or future traditional land and resource use.</p>	<p>undertake traditional land use activities in the region.</p> <p>The iPD does not fully discuss the specific locations of potential Indigenous receptors (e.g., locations of any cabins or Indigenous receptors who may be engaging in traditional land use activities). This information, in addition to conceptual health effect pathways, would help to support a complete assessment of the potential environmental, social, and economic impacts on the health of Indigenous Peoples.</p>		<p>receptor, information about the type of receptor (e.g., permanent or seasonal residence, traditional land user), and any associated assumptions or limitations.</p> <p>Further, HC recommends that the Proponent provide an outline of potential linkages between project-related environmental impacts and Indigenous health, in accordance with HC's Impact Assessment Guidance for: Human Health Risk Assessment, Air Quality, Drinking and Recreational Water Quality, Country Foods, and Noise. Include the methods and criteria that may be used to assess human health effects.</p>
HC-02	<p>Exposure of Indigenous peoples to CoPCs if air quality guidelines may be taken as pollute up-to-levels of emissions, particularly for non-threshold contaminants.</p>	<p>The Project will result in air pollutant emissions from combustion of natural gas or diesel during the construction and operations.</p> <p>The iPD indicates in Table 5-6 that these emissions will include (among others): carbon monoxide, nitrogen oxides, sulphur oxides, volatile organic compounds, and particulate matter, which have potential human health implications.</p>	<p>Air emissions from the Project have the potential to impact the health of Indigenous receptors via inhalation of CoPCs.</p>	<p>Air emissions are expected for the Project which might lead to impacts on Indigenous health, an area of federal jurisdiction. For non-threshold air pollutants (e.g., fine particulate matter [PM<sub>2.5</sub>] and nitrogen dioxide [NO<sub>2</sub>]), air quality criteria and guidelines should not be used as 'pollute-up-to levels', since any increase in exposure will result in an incremental population risk. When pollutant levels approach or exceed</p>	<p>The iPD indicates that an air quality assessment will be conducted. It is important, during air quality assessments to consider health-protective guidelines, including for non-threshold contaminants. HC supports the use of the Canadian Ambient Air Quality Standards (CAAQS) as the most stringent criteria for air quality, however, it should be noted that some CAAQS values are not entirely "health-protective" and should not be used to fully estimate health risks.</p> <p>For a quantitative risk assessment, HC recommends using the World Health Organization (WHO) global air quality guidelines<sup>5</sup> for fine particulate matter (PM<sub>2.5</sub>) and nitrogen dioxide (NO<sub>2</sub>) (24-hour and annual averaging periods). These guidelines have been set at the lowest exposure level to an air pollutant above which the WHO is confident that there is an increase in adverse health effects.</p>	<p>HC supports implementing all economically and technologically feasible mitigation measures to limit emissions of non-threshold air contaminants to the extent possible. This includes consideration of keeping clean areas clean and continuous improvement. Any mitigative efforts undertaken as a result of the planned air quality assessment should be undertaken in keeping with these principles. Consequently, the applicable air quality standards, such as the CAAQS, should not be considered as "pollute up-to" levels and the Proponent is encouraged to strive for continuous improvement.</p>	<p>When conducting the air quality assessment, following best practices, including using health-protective guidelines, and not considering standards as pollute-up-to levels, will help minimize exposure risk for nearby Indigenous receptors.</p>

<sup>5</sup> World Health Organization. (2021). WHO global air quality guidelines: particulate matter (PM<sub>2.5</sub> and PM<sub>10</sub>), ozone, nitrogen dioxide, sulphur dioxide and carbon monoxide. World Health Organization. <https://iris.who.int/handle/10665/345329>.

				applicable Canadian or provincial standards, the Proponent is encouraged to compare against solely health-based guidelines.			
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*Please insert additional rows as necessary.*