

Federal Authority Advice Record (FAAR)

FAAR Response must be submitted by September 2, 2025

Greenlight Electricity Centre Project – Greenlight Electricity Centre Limited Partnership.
Registry File: 89790

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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?

ISC does not anticipate exercising a power, duty or function, or providing financial assistance related to the project that would enable the project to be carried out in whole or in part.

As relevant,

- a) 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
 - b) Describe any associated Indigenous or public consultation, including timelines
 - c) 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 required¹
 - d) Identify any associated project-specific guidance or issues of which the proponent should be aware, or information the proponent should provide.
2. **Using Table 1**, identify project- and context- specific **key issues**, based on the expertise within your mandate² 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:
- a) Specify the key issue (e.g., specific species and location)
 - b) Specify the project component or activity linked to the key issue
 - c) Explain why it's a key issue based on:
 - i. biophysical effect pathway(s) from the specific project component or activity
 - ii. concern unique to the project or a priority within your mandate
 - iii. the issue being material³ to decision making under the *Impact Assessment Act*
 - d) Identify how the issue could be resolved, including through means other than an impact assessment
 - e) Identify additional information the proponent could provide including to give confidence on how the issue can be addressed through other means.

Jan Triska, Environmental Management
Officer

Name and title of Departmental /
Agency Responder

¹ 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.

² Refer to the [Memoranda of Understanding with IAAC](#).

³ 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.

September 2, 2025
Date

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"> • <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"> ○ <i>federal experts' knowledge and experience with past project assessments;</i> ○ <i>presence of sensitive species, habitats or human receptors (including Indigenous Peoples);</i> ○ <i>novel or complex project activities, components or technologies;</i> ○ <i>high uncertainties in effects or in the effectiveness of mitigation measures;</i> ○ <i>unknown or unproven mitigation; or</i> • <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> 	<p><i>Describe how the key issue could be resolved or addressed by:</i></p> <ul style="list-style-type: none"> • <i>Any means, including powers, duties, functions, frameworks, policies or guidance that your department or agency has;</i> • <i>Any means, including powers, duties, functions, frameworks, policies or guidance from another jurisdiction, including the province;</i> • <i>Common, proven, well-understood or standard mitigation measures to mitigate the effect or effect pathway(s); or</i> • <i>Commitments made by the proponent (e.g., in the Initial Project Description).</i> 	<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>
ISC_LED - 01	<p>Change in wetlands potentially important to Indigenous people and impacting traditional land and resource use.</p> <p>Section 18.7.2. of the IPD describes what may be "crown-claimable" wetlands</p>	<p>Multiple mechanical activities during site preparation and construction, involving vegetation clearing, potentially also coupled with elevated noise levels, effects of dust and other general</p>	<p>Removal of vegetation, drying of existing wetland area, as well as potential introduction of other plant species due to mechanical activities around the project site/surrounding areas. Changes to air</p>	<p>It is known that traditional land and resource use that currently is practiced by Indigenous groups in the vicinity of the project include hunting, fishing, trapping, traditional plant uses and cultural transmission (e.g., spiritual</p>	<p>Changes to wetlands and related use may affects the health, social and economic conditions of Indigenous peoples</p> <p>Reconciliation with Indigenous people and the adherence to UNDRIP principles includes close consideration for lands where Indigenous groups are</p>	<p>Engage more closely with the First Nations groups who are known to practice traditional land and resource use in areas surrounding the project, with the goal of being able to more fully characterize such uses, especially related to the wetland. E.g. identify areas of potential impact from project activities.</p>	

	<p>but does not indicate if any of the wetlands to be disturbed are crown-claimable. Despite the projects location on private land, any crown-claimable wetlands may be available for traditional use by Indigenous people. Furthermore, Section 21.1 fails to identify Elk Island National Park which is approximately 22 km southeast of the project (Section 13.6). The 2023 Elk Island National Park Management Plan includes medicinal harvesting.</p> <p>The area as a designated Industrial area is subjected to cumulative effects in this regard.</p>	effects of construction using heavy equipment.	quality and deposition of dust from construction can also impact use.	growth). Wetlands in general are very species-rich. There could be a temporary to long term loss of access to sites used to gather medicinal plants, for example.	<p>known to practice traditional uses – and involving the members of those groups in project related deliberations.</p> <p>Indigenous groups could be adversely affected by cumulative effects of the planned electricity-generating project and other industrial developments in this area of Alberta.</p>	Consider the overall industrialization levels and changes to land use in and around the Alberta Industrial Heartland district.	
ISC-LED-02	Effects on socio-economic conditions in Indigenous communities	During both construction and regular operations, the project has the potential to stimulate a variety of economic activities (mostly positive), including direct and indirect employment, opportunities for contractors and sub-contractors, and procurement of good and services.	Supply of materials and movement of workers during the construction phase could induce additional economic activities and open up opportunities in the surrounding region. Indigenous groups with settlements in relative proximity (for example Paul FN, Enoch Cree FN, Alexander FN) stand to potentially benefit from these opportunities.	ISC has the mandate to promote the general improvement of economic and social conditions of Indigenous Peoples, including the socio-economic conditions in on-reserve communities.	This would be a potentially positive set of effects within the federal jurisdiction and support Indigenous economies and economic reconciliation, if planned for appropriately, in partnership with affected and interested Indigenous groups.. A variety of factors influence the extent to which these benefits are realised and distributed.	<p>Describe the project's impact on the employment landscape, including anticipated economic growth and employment opportunities. Recommend describing types and number of jobs created (permanent/part-time).</p> <p>Related to the above, list some procurement opportunities that could be communicated to the Indigenous-owned or managed companies in the region; Job-focused education: establishing new or leveraging already existing apprenticeship program to help train prospective qualified workers from amongst Indigenous communities (close to the AB Industrial Heartland).</p>	Proposal would benefit from providing an overview of existing arrangements and agreements that involve economic participation of Indigenous communities in the AB Industrial Heartland (whether general or industry-specific).
ISC-FNIHB-01	Lack of meaningful engagement with Indigenous Nations and communities on the potential positive and negative impacts of the project.	This issue is linked to the proponent's engagement activities, which are essential for identifying and assessing the potential positive and negative impacts of the project on Indigenous Nations and communities. The IPD demonstrates a lack of meaningful engagement with Indigenous Nations and communities, which limits the	The lack of meaningful engagement with Indigenous Nations and communities affects biophysical pathways by limiting the identification and understanding of how project activities may positively or negatively impact the health and social determinants of health of Indigenous Peoples.	Meaningful engagement is central to fulfilling the mandate of Indigenous Services Canada (ISC), which is to improve access to high-quality services, enhance well-being in Indigenous communities, and support Indigenous Peoples in assuming control over service delivery in ways that reflect their rights, cultures, and aspirations. Engaging with Indigenous Nations and communities is integral to fully understanding the impacts of the project on the	There is a lack of meaningful engagement with Indigenous Nations and communities. While initial contact was made through letters to 18 Indigenous Nations and communities, the proponent did not receive any responses. Additional efforts to engage with Indigenous Nations and communities should be taken by the proponent to fully understand the potential positive and negative impacts of the project on the health and social determinants of health of Indigenous Peoples.	<p>The proponent should meaningfully engage with Indigenous Nations and communities on the potential positive and negative impacts of the project. This is required to fully understand how the health and social determinants of health of Indigenous Peoples may be impacted.</p> <p>To enhance reconciliation and build meaningful relationships within the region, the proponent should focus on how the project could benefit nearby Indigenous Nations and communities. For example, increasing the availability of reliable and affordable electricity to Indigenous Nations and communities</p>	

		proponent's ability to fully understand and consider the potential impacts on the health and social determinants of health of Indigenous Peoples.		health and social determinants of health of Indigenous Peoples. To comply with Article 32 (2) of the United Nations Declaration on the Rights of Indigenous Peoples, the proponent must engage with the affected Indigenous Nations and communities during all stages of the impact assessment, as well as project construction, operation and reclamation. <i>Article 32 (2): "States shall consult and cooperate with affected indigenous peoples in good faith through their own representative institutions, with a view to obtaining their free and informed consent prior to the approval of any project affecting their lands or territories and other resources, including the development, use or exploitation of mineral, water or other resources."</i>	In Section 23 Potential Effects on Indigenous Health, Social, and Economic Conditions, the proponent states that "effects to Indigenous peoples are also expected to be negligible." The proponent should not make this assertion without verifying the potential impacts with nearby Indigenous Nations and communities.	could positively impact health and wellbeing. The proponent could also discuss potential employment and procurement opportunities with Indigenous Nations and communities (see comment ISC-LED-02 for more details). Lastly, the proponent should explain how the statement in Section 23 "effects to Indigenous peoples are also expected to be negligible" was verified without meaningful engagement with and input from Indigenous Nations and communities.	
ISC-FNIHB-02	The potential impact of accidents and malfunctions on Indigenous Peoples' access to emergency services and healthcare services.	The construction and operation phases of the project could result in accidents and malfunction scenarios.	An accident and/or malfunction could unexpectedly escalate the demand for emergency services and healthcare services. This could adversely affect First Nations' access to emergency services and healthcare services during the construction and operation phases of the project.	ISC provides healthcare services to First Nations communities. An accident and/or malfunction could adversely affect access to healthcare services for nearby First Nations communities.	The proponent does not describe or provide mitigation measures for potential accident and malfunction scenarios that could arise as part of the project. Accidents and malfunctions could unexpectedly escalate the demand for emergency and healthcare services. This could adversely affect First Nations' access to healthcare, who are in proximity of the project (e.g., Enoch Cree Nation, Alexander First Nation, Paul First Nation, and Saddle Lake Cree Nation), during both the construction and operation phases of the project.	The proponent should proactively assess the potential impact of the project on emergency and healthcare services and access for Indigenous communities. The proponent should include mitigation measures for the potential accident and malfunction scenarios that could occur in an Emergency Response Plan (e.g. developing contingency plans, ensuring timely communication, and addressing any unexpected emergencies that may strain existing healthcare services).	

Please insert additional rows as necessary.