

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

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 required¹
- 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 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:

- 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 material³ 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](#)

Name and title of Departmental /
Agency Responder

[Sept 02, 2025](#)

Date

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.

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><i>e.g.: IAAC-01</i></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>
<p>HC-01</p>	<p>Potential exposure of Indigenous peoples to contaminants of potential concern (COPCs).</p>	<p>Activities throughout the life of the Project (e.g., construction and operations) will potentially emit and discharge contaminants into the environment where Indigenous peoples may be exposed.</p> <p>Key sources of Project related emissions are related to the combustion of natural gas in combined cycle gas turbines, fugitive dust from land clearing</p>	<p>Project emissions could result in Indigenous peoples being exposed to COPCs (e.g., from air emissions).</p> <p>An example of a potential exposure routes includes inhalation of COPCs in air contaminated via natural gas combustion, operation of diesel equipment, and dust.</p>	<p>Under the <i>Impact Assessment Act</i> HC provides expert information and knowledge to support the assessment of impacts on Indigenous health.</p> <p>The Project is located in the Alberta Industrial Heartland – Designated Industrial Zone (IH-DIZ) which is zoned for heavy industrial use. There are three known residential dwellings</p>	<p>As per <i>Impact Assessment Act</i> Sections 2(e) and 2(f), 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. The closest Indigenous communities are Alexander First Nation and Enoch Cree Nation, located 45 and 47km southwest and west of the Project, respectively. The Project is 6.8km southeast of Fort Saskatchewan, 8.5km west of Gibbons and 14km northeast of Edmonton, all of which house urban Indigenous populations who may choose to engage in traditional land use activities in the region.</p>	<p>To minimize Project related emissions and potential impacts on air quality, the iPD proposes management and mitigation measures (e.g., the implementation of Best Available Technologies and standard operating procedures). Considering the size and complexity of the Project, and that the location of the Project (the IH-DIZ) is zoned for heavy industrial use, standard mitigation may be sufficient to address the outlined project effects if designed through meaningful Indigenous engagement.</p> <p>HC recommends that operable health effects pathways (e.g., inhalation) be</p>	<p>To address potential contaminant exposure, for example through changes in air quality, HC recommends that operable health effects pathways be assessed to describe linkages between Project related biophysical changes and potential health outcomes using health based qualifiers.</p>

		and site preparation, and emissions from diesel and gasoline engines (e.g., nitrogen oxides, sulphur dioxide, carbon monoxide, volatile organic compounds and particulate matter).		<p>within 2 km of the Project, however additional residential developments are restricted in the area.</p> <p>Further, the Project appears to be standard in size and complexity for the industry. HC does not have knowledge of the receiving environment being sensitive or rare.</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>identified and assessed to clarify potential linkages between Project related biophysical changes and the health conditions of indigenous receptors near the project footprint as part of future project submissions, as appropriate. This includes outlining predicted changes in levels of COPCs, and describing the linkages between biophysical changes resulting from the Project, such as alterations to air quality, and potential human health outcomes using health-based benchmarks and dose limits as qualifiers.</p> <p>HC is aware that the Project is within Alberta Health Services (AHS)'s Edmonton zone. AHS could be consulted to better understand the existing human health environment and any anticipated changes from future project development.</p>	

Please insert additional rows as necessary.