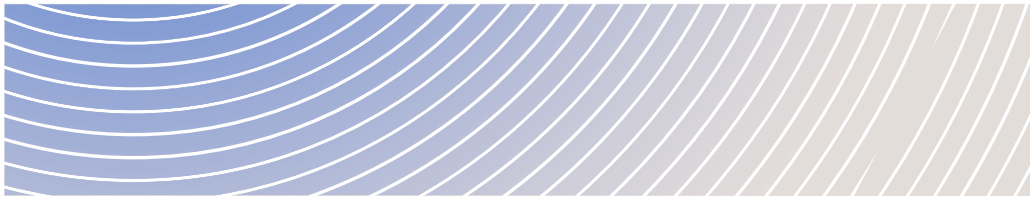


# Tailored Impact Statement Guidelines



SHAAKICHUWAANAAN MINING PROJECT

Draft version

June 19, 2025

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This is a draft document. Contents may change as a result of ongoing engagement and feedback received. Please check back regularly for updates.

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Impact Assessment  
Agency of Canada

Agence d'évaluation  
d'impact du Canada



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Grand Council of the Crees (Eeyou Istchee)  
Grand Conseil des Cris (Eeyou Istchee)

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Cree Nation Government  
Gouvernement de la Nation Cris

Canada



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## Abbreviations and Short Forms

Term	Definition
COMEV	Environmental and Social Impact Assessment Committee
COPC	Contaminant of potential concern
COSEWIC	Committee on the Status of Endangered Wildlife in Canada
Declaration	United Nations Declaration on the Rights of Indigenous Peoples
DFO	Fisheries and Oceans Canada
ECCC	Environment and Climate Change Canada
GBA Plus	Gender Based Analysis Plus
GHG	Greenhouse gases
the Guidelines	Tailored Impact Statement Guidelines
HHRA	Human health risk assessment
IAA	<i>Impact Assessment Act</i>
IAAC	Impact Assessment Agency of Canada
IEPP	Indigenous Engagement and Partnership Plan
Registry	Canadian Impact Assessment Registry
SACC	Strategic assessment of climate change
SARA	<i>Species at Risk Act</i>
VC	Valued component



# 1. Introduction

The federal impact assessment process is intended to prevent or mitigate significant adverse effects within federal jurisdiction — and significant direct or incidental adverse effects — by anticipating, identifying and assessing the effects of designated projects in order to inform decision making under the *Impact Assessment Act* (IAA). The Joint Assessment Committee (the Committee), composed of representatives from the Impact Assessment Agency of Canada (IAAC) and the Cree Nation Government, developed these Draft Tailored Impact Statement Guidelines for the Shaakichiuwaanaan Mining Project (the Project) proposed by Patriot Battery Metals (the proponent). The committee will use the proponent's Impact Statement along with other available information received during the impact assessment process to prepare an Impact Assessment Report.

The Guidelines include information and studies the committee considers necessary for the conduct of the impact assessment based on adverse effects within federal jurisdiction, or direct or incidental adverse effects (collectively referred to as adverse federal effects thereafter) that could potentially be significant. The tailoring of this document is based on the nature, complexity and context of the Project, as well as by consultation and engagement with the public, Indigenous groups and federal authorities, and information provided by the proponent.

The Guidelines will be finalized following a comment period on these draft Guidelines, which will run from June 19 to July 19, 2025.

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## 1.1 Scope of the impact assessment

In determining what information and studies are required in the proponent's Impact Statement for the federal impact assessment process, the committee took into account the factors listed in subsection 22(1) of the IAA.

In support of the Government of Canada's objective to promote the principle of "one project, one assessment", these Guidelines identify sections where the federal impact assessment and the Province of Quebec's environmental and social assessment process have similar information requirements. The committee has referred to the [Directive pour le Projet minier Corvette \(In French Only\)](#) (Corvette is the former name of the Project) issued by the Environmental and Social Impact Evaluating Committee (COMEV), thereafter referred to as the COMEV directive, in developing these Guidelines.

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## 1.2 Selection of Valued Components

The impact assessment focuses on the Valued Components (VCs) whose analysis is anticipated to be material for decision-making under the IAA. The VCs serve as the focal points for the Impact Statement and will feed into the conclusions of the Impact Assessment Report. [Erreur! Source du renvoi introuvable.](#) Each VC must be assessed following the generic assessment methodology, as well as VC-specific requirements



presented in the Guidelines. The assessment of effects on VCs includes the assessment of the likely effect pathways that are cause-effect linkages between a project component or activity and the VC.

The Impact Statement must include, at minimum, the following VCs:

Valued Component selected	Rationale for inclusion
<b>Valued Components for the assessment of adverse effects within federal jurisdiction, as defined in section 2 of the IAA</b>	
Fish and fish habitat	Physical modifications to aquatic habitat could have potential adverse effects on fish and fish habitat through habitat destruction and loss, habitat alteration and disruption, relocation and possibly fish mortality. Alterations to water quality and quantity through physicochemical changes, contaminant release and sensory disturbance (vibration and explosion) could also have adverse effects on fish and fish habitat.
Migratory birds	Habitat loss and fragmentation, sensory disturbance from noise and light, changes in air quality and increased risk of collision mortality could all have adverse effects on migratory birds.
Indigenous Peoples physical and cultural heritage, and structures, sites or things of historical, archaeological, paleontological or architectural significance.	Excavation work and the construction of new infrastructures could have an adverse impact on sites of historical and archaeological significance to Indigenous Peoples.
Current use of lands and resources for traditional purposes by Indigenous Peoples.	Changes to terrestrial environment could adversely affect traditional caribou hunting, while changes to the aquatic environment could adversely affect traditional fishing and boating.
Health, social and economic conditions of Indigenous Peoples.	Changes in air and surface water quality, as well as the noise and light environment, could have adverse effects on the health of Indigenous Peoples.  The Project could revive certain traumas caused by hydroelectric developments, impact social cohesion, generate stress and exacerbate some social issues in the community.



Additional Valued Components for elements of the decision under article 63 of the IAA	
Job creation	The project could generate job opportunities that would contribute to sustainability.
Contribution of the effects of the Project to the environmental obligations and climate change commitments of the Government of Canada, and to sustainability.	The effects of the Project could contribute to the development of renewable energies and to sustainability.
Economic partnerships	The Project could lead to economic partnerships that benefit local communities and contribute to sustainability.

The proponent may select additional VCs, in consultation with Indigenous groups and participants, and in consideration of Indigenous Knowledge and community knowledge. The Impact Statement must provide a justification if a VC suggested by an Indigenous group is excluded from the Impact Statement.

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## 1.3 Preparing the Impact Statement

In preparing the Impact Statement, the proponent must adhere to ethical guidelines and cultural protocols governing research, data collection and confidentiality. The proponent must respect the obligation of protecting personal information, including for disaggregated data from different groups or subgroups, and adopt the established standards for the management of Indigenous data (e.g. [First Nations principles of Ownership, Control, Access and Possession](#) or standards adopted by an Indigenous group). The committee recommends the Impact Statement follow the structure of the Guidelines or provide a table of concordance that indicates where in the Impact Statement the information set out in these Guidelines has been provided.

The Impact Statement must meet all the requirements set out in the Guidelines, including those referring to the requirements of the COMEV directive. The Impact Statement must also meet the requirements outlined in the appendices to the Guidelines, including following the Assessment Methodology, and requirements related to Proponent information, the Description of engagement with Indigenous groups, the Description of public participation and the Assessment Summary in both official languages. The proponent may submit a single document that meets both IAAC and COMEV requirements.

Where the proponent is of the opinion that the information is not required, it should contact the committee prior submitting the Impact Statement to confirm whether the proponent's rationale for excluding the information is appropriate. The rationale must also be provided in the Impact Statement. As applicable, the proponent is also encouraged to refer to the requirements of other jurisdictions to assess effects, as well as to means of other jurisdictions to address effects of the Project and to report in the Impact Statement how these were leveraged to assess effects. The proponent should also notify the committee of any changes made to the Project relative to the Initial Project Description.



The Impact Statement must take into account, where relevant:

- any relevant regional or strategic assessment;
- any relevant assessment of the effects of the Project that is conducted by or on behalf of an Indigenous governing body and that is provided to the proponent with respect to the Project;
- any study or plan that is prepared by a jurisdiction—or an Indigenous governing body—in respect to the region related to the project and that is provided to the proponent with respect to the Project;
- Indigenous Knowledge, community knowledge, as well comments received from Indigenous groups, the public and others; and
- Gender-based Analysis Plus (GBA Plus) as an analytical process to understand who is impacted by the Project and how they may experience impacts differently, by considering the intersection of sex and gender with other identity factors. The [Guidance: Gender-based Analysis Plus in Impact Assessment](#) provides guiding principles and tools for applying GBA Plus.

The proponent is encouraged to engage the committee as early as possible to clarify the requirements in the Guidelines and to support early resolution of issues. IAAC may establish technical advisory groups consisting of Indigenous groups, federal authorities or others. The proponent is also encouraged to submit draft documents for review by IAAC (e.g. proposed study plans, draft sections of the Impact Statement) prior to submitting the formal Impact Statement.

Under the IAA, the proponent must provide the information or studies required by the Guidelines within three years from the day on which a copy of the notice of commencement of the impact assessment is posted on the Registry. The three-year period includes the time required for the proponent to review the Impact Statement and take into account comments and questions made by the committee. At the request of the proponent, the committee may, taking into account the proponent's progress, work plan and other relevant factors, extend the time limit by any period necessary for the proponent to provide IAAC with the required information or studies. If the proponent fails to provide the committee with the information or studies required in the Guidelines within the three-year period, or within any extension of that period, the impact assessment is terminated.

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## 1.4 Format and accessibility

The impact assessment must be based on information that is publicly accessible, within the limitations of confidentiality and ethical constraints, such as in relation to Indigenous and community knowledge, confidential business information and intellectual property.

The Impact Statement must:

- summarize the documents that served as key references and are not otherwise publicly accessible, and, where possible, append them to the Impact Statement; and
- include all information in a machine-readable, accessible format.



Where information is provided as a map in the Impact Statement, the proponent must provide corresponding electronic geospatial data file(s). IAAC will make the geospatial data files available to the public under the terms of the [Open Government Licence - Canada](#). Geospatial data files must follow IAAC's [Guidance on submitting geospatial data](#).

The proponent must be prepared to provide data, including surveys, analyses, methods, modelling and results in well-documented data files, including in geoenabled format where available, on the committee's request to support the Impact Statement.

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## 1.5 Federal permitting coordination

IAAC will provide coordination of federal permits, licences or authorizations (collectively called permits) early and throughout the impact assessment process to meet the objectives of:

- clarity on permitting requirements, timelines and processes through the development of a detailed federal permitting plan; and
- transparency on the status and progress of permits through public reporting on the Registry.

Federal authorities are prohibited from issuing permits, licenses and authorizations until the impact assessment process has been completed. The proponent, however, is encouraged to develop and/or apply for federal permits early in the impact assessment. Information, engagement and consultation requirements for permits may be completed at the same time as the impact assessment and, where applicable, the same information can be used for both processes. Collecting and providing permitting information during the impact assessment process may expedite subsequent federal decisions, should the impact assessment decision be positive.



## 2. Project description

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### 2.1 Project overview

The Project subject to the impact assessment includes the designated physical activities and any incidental physical activities. The proponent must describe the Project, presenting the main components of the Project and associated activities, details of their scheduling, timing of each phase, the total lifespan of the Project and other essential characteristics. If the Project is to be developed in phases, information on progressive and phased development must be described.

### 2.2 Project location

The Impact Statement must describe the geographical setting and context in which the Project will be carried out, in order to understand the effects and potential impacts of the Project on the environment, health, society and the economy. To this end, the proponent must refer to the requirements of the COMEV directive, specifically sections 3. Project description and 4. Description of the environment.

The Impact Statement must also specify the location of any federal lands in the study area, as well as the distance between the project components and federal lands, including Reserve lands or to be added to a Reserve, within the meaning of subsection 2(1) of the *Indian Act*.

### 2.3 Regulatory framework

To describe the regulatory framework of the Project, the proponent must refer to the requirements of the COMEV directive in section 1.4 Laws, Regulations, Agreements and Policies. This description must also identify any federal legislative requirements and any federal power, duty or function and financial support.

### 2.4 Project components and activities

The Impact Statement must describe project components and activities to be carried out during each project phase, and provide sufficient detail to understand the potential environmental, health, social and economic effects of the Project, as well as the impacts on Indigenous Peoples and their rights, as determined by Indigenous groups. To this end, the proponent must refer to the requirements of the COMEV directive in sections 1. Background and 3. Project description.

The description of the planned components and activities must include the following:



## 2.4.1 Project components at the mine site

- the roads and culverts at the mine site to allow movement of the mining equipment fleet;
- the workers camp at the mine site, for the construction and operation of the mine;
- the open-pit and underground mining infrastructures;
- the storage areas for waste rock, tailings and ore;
- the dams to isolate the open-pit from Lake 01;
- the diversion channel
- the electrical substation and distribution network at the mine site;
- the ore processing plant;
- the paste backfill plant;
- the water treatment plant;
- the water management infrastructures (ditch, basin, etc.);
- the explosive emulsion plant and storage magazines;
- the garage and other ancillary buildings;
- the fuel storage area and refuelling station; and
- any other infrastructure relevant to the Project.

## 2.4.2 Project activities

### 2.4.2.1 Site preparation and construction

- clearing, topsoil stripping, levelling and earthworks (cut and/or fill depending on local topography);
- production of concrete and washing of concrete mixers;
- construction of temporary or permanent infrastructures;
- construction of temporary roads and haul roads;
- construction of mine waste management infrastructure (e.g., storage areas for waste rock, tailings and ore, etc.);
- blasting;
- transport, storage and management of explosives on site;
- the draining of part of Lake 01;
- construction of water crossings (temporary or permanent);
- water management, and sediment and erosion control during construction;
- construction of infrastructures to manage surface runoff and site drainage, as well as infrastructures to manage contact water, infiltration, drainage or treatment processes;



- wastewater management and treatment;
- operation and maintenance of light, heavy and mobile off-road power equipment;
- storage, management and disposal of combustible materials and hazardous waste; and
- management and disposal of non-hazardous residual materials.

#### 2.4.2.2 Operation

- ore extraction, processing and treatment;
- drilling and blasting;
- storage and use of explosives;
- use and maintenance of haul roads;
- mine waste management (including tailings, waste rock and overburden);
- wastewater management;
- storage, handling and transportation of materials on site;
- storage and handling of reagents, petroleum products, chemicals, hazardous materials and residual materials; and
- management and recycling of non-mining waste (types of waste, disposal methods, quantities, disposal sites or facilities).

#### 2.4.2.3 Decommissioning and abandonment

- site closure, rehabilitation and restoration (mine waste storage areas, open pit, underground infrastructure, various buildings);
- infrastructure dismantling;
- dismantling and removal of equipment;
- long-term maintenance, monitoring and upkeep of site integrity, including site drainage, water and effluent management and any remaining structures; and
- closure of temporary or permanent facilities, or suspension of operations.

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## 2.5 Project purpose, need and alternatives considered

The proponent must explain the purpose and need for the Project and provide information on alternatives to the Project.

### 2.5.1 Purpose and need for the Project

To explain the purpose and need for the Project, the proponent must refer to the COMEV directive in section 1.3 Purpose for the Project.



## 2.5.2 Alternatives means of carrying out the Project

To provide information on alternatives means of carrying out the Project, the proponent must refer to the COMEV directive in Section 2. Selection of site and technology alternatives.

In addition, in justifying its alternatives, the proponent must consider the effects and impacts on Indigenous Peoples and their rights, and the effects on species at risk. The proponent must carry out this analysis for the main components of its project, taking into account the scope of the federal impact assessment.

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## 2.6 Effects of the environment on the Project

The Impact Statement must:

- describe how environmental conditions, including natural hazards, such as severe or extreme weather events, fires, or flooding, could adversely affect the Project and VCs assessed;
- identify the geological hazards in the region, including a history of seismic activity and landslide as well as risk of ground instability;
- evaluate the potential effects of seismic events on the facilities and provide the soil movements parameters that will be used along with the probability of occurrence (e.g., 2% in 50 years) as well as the best practice codes and guides that are or will be used in the seismic effects analysis (e.g., National Building Code of Canada 2015, CAN/CSA-Z662 standard);
- describe the Project's climate resilience and how the impacts of climate change have been integrated into the project design and planning throughout the life of the Project (including infrastructure, water and tailings management processes). Describe the climate data, projections and related information used to assess risk throughout the life of the Project. The proponent is encouraged to refer to the guidance on how to conduct a climate change resilience assessment found in the [Strategic Assessment of Climate Change \(SACC\)](#) and the [Draft Technical Guide related to the SACC: Assessing climate change resilience](#). The proponent may refer to the COMEV directive, in particular Chapter III Taking climate change into account in project design and the Impact Statement.

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## 2.7 Potential accidents and malfunctions

The failure of certain works caused by technological malfunction, or accidents resulting from human error or exceptional natural events (e.g. flooding, earthquake, forest fire) could cause major effects. Accidents or malfunctions that may occur during the various phases of the Project must be described (even if unlikely to occur), and their effects on the VCs assessed. To carry out this assessment, the proponent must refer to the requirements of the COMEV directive, in section 7. Management of risks. The Impact Statement must also describe an emergency response plan. To this end, the proponent must refer to the requirements of section 7.3 Preliminary emergency measures plan of the COMEV directive.



## 3. Fish and their habitat

The Impact Statement must assess effects of the Project on fish and fish habitat, as defined in subsection 2(1) of the *Fisheries Act*, and on marine plants, as defined in section 47 of the *Fisheries Act*, based on likely effect pathways. Certain intermittent and ephemeral watercourses or water bodies may constitute or contribute to fish habitat. The absence of fish or water at the time of the survey does not irrefutably indicate an absence of fish and/or fish habitat. Similarly, beaver dams and accumulations of woody debris are not considered impassable barriers to fish.

The proponent is encouraged to refer to the [Framework for assessing fisheries productivity for the Fisheries Protection Program](#) and the [Science-based framework for assessing the response of fisheries productivity to state of species of habitats](#).

If a permit is required under section 34 or 35 of the *Fisheries Act*, the proponent is encouraged to coordinate the collection of information and associated consultations required for this authorization with the requirements for the assessment of impacts on fish and fish habitat (sections 3.1 to 3.4 below). Further information on permit requirements under the *Fisheries Act* is available in the [Applicant's Guide Supporting the Authorizations Concerning Fish and Fish Habitat Protection Regulations](#).

If an amendment to Schedule 2 of the *Metal and Diamond Mining Effluent Regulations* is required, providing the required information during the impact assessment, in accordance with ECCC's guidelines and DFO's policies, can reduce the time needed to obtain an amendment to Schedule 2 of the *Metal and Diamond Mining Effluent Regulations*.

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### 3.1 Groundwater and surface water baseline conditions as a pathways of effects to fish and fish habitat

To describe the baseline conditions for groundwater and surface water, the proponent must refer to the requirements of the COMEV directive in section 4.2 Description of the environment. These requirements cover, among other things, the delineation and characterization of wetlands and water bodies, hydrogeological characterization, uses of watercourses and water bodies, aquatic and riparian vegetation, as well as several elements specific to dikes and watercourse detour.

To inform the assessment of effects on groundwater and surface water, the Impact Statement must also include a characterization and description of mine materials and their management. To this end, the proponent must refer to the requirements of the COMEV directive in section 3.4 Tailings and waste rock management.

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### 3.2 Baseline conditions for fish and fish habitat



To describe the baseline conditions for fish and fish habitat, the proponent must refer to the requirements of the COMEV directive in section 4.2 Description of the environment. These requirements include the identification and description of fish species and their habitats.

In addition to the information required in the COMEV directive, and more specifically, for water bodies and watercourses (permanent and intermittent) frequented by fish and likely to be affected by the Project, the description of fish populations must include their life cycle. Also, the description of potential and confirmed fish habitats must include a characterization of their function (feeding, reproduction, rearing, shelter, growth, migration) and quality for the species present.

In addition, the Impact Statement must also provide a list of aquatic species listed in Schedule 1 of SARA likely to be present, such as lake sturgeon, southern Hudson Bay and James Bay populations, and provide the location and description of these species' habitat (residence and critical habitat) in or near the study areas. The proponent is also encouraged to include other species assessed by COSEWIC.

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### 3.3 Effects on groundwater and surface water as a sequence of effects on fish and fish habitat

To describe the Project's effects on groundwater and surface water, the proponent must refer to the COMEV directive in section 5.1 Determination and assessment of impacts. These requirements cover, among other things, the Project's effects on water quality and quantity, on the water table and on wetlands, as well as the effects of dikes and watercourse detour. The assessment of effects on water must also include a water balance and hydrogeological modeling.

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### 3.4 Effects to fish and fish habitat

The proponent must refer to the requirements of the COMEV directive in section 5.1 Determination and assessment of impacts to describe potential effects to fish and fish habitat. These requirements cover, among other things, the effects of the Project to fish populations and their habitats, including fish survival and movement, and habitat alteration or destruction. The requirements also include several types of effects resulting from dikes and water diversion, such as the modification of fish communities and the propagation of undesirable ichthyological species.

In addition to the information required by the COMEV directive, and more specifically, the Impact Statement must include an assessment of the potential effects on the life cycle of the fish species present. In addition, the assessment of effects to fish and fish habitat must consider:

- the possible increase in fishing in the study areas;
- sensitive periods for fish;
- the potential effects of noise and vibrations;



- the likely effects on aquatic species at risk listed on Schedule 1 of SARA, notably the lake sturgeon, southern Hudson Bay and James Bay population, and the objectives of management plans, recovery strategies and action plans for those species. The proponent is also encouraged to include species assessed by COSEWIC.

The proponent is invited to consult the guidelines of DFO, in particular the [Pathways of Effects Diagrams for the Fish Habitat Protection Program](#).



## 4 Migratory birds

The Impact Statement must describe and characterize the effects of the Project on migratory birds as defined in the *Migratory Birds Convention Act, 1994*. Among the bird species likely to be present, the proponent may select birds or groups of birds to be used as indicators for assessing the effects. The proponent must select these birds or groups of birds considering that different species and groups of species may be affected differently by the Project and may require different mitigation measures. At a minimum, the Impact Statement must address each of the migratory bird species at risk under the *Species at Risk Act* likely to be affected by the Project, including:

- Harlequin Duck, Eastern population;
- Red Crossbill, subspecies *percna*;
- Common Nighthawk;
- Barrow's Goldeneye, Eastern population;
- Bank swallow;
- Olive-sided Flycatcher; and
- Yellow Rail.

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### 4.1 Baseline conditions

To describe the baseline conditions for migratory birds or groups of birds and their habitats, the proponent must refer to the requirements of the COMEV directive in section 4.2 Description of the environment. These requirements mainly concern the description of the bird species present and their habitats, and the mapping information required.

In addition to the information required in the COMEV directive, and more specifically, for the selected migratory birds, the Impact Statement must describe:

- their population, distribution, seasonal ranges, migrations, movements, habitat use for relevant life cycle stage, and sensitive periods. These descriptions must include estimates of abundance or density, where available; and
- if it is a species at risk, the threats and conservation objectives applicable to the recovery programs;

In addition, the proponent must justify whether existing information and recent studies are sufficient to support the effects assessment, taking into account the uncertainties and bias of these sources. If existing information is not sufficient, the proponent must conduct surveys to assess effects, including:

- targeted surveys to better determine the presence or location of species at risk where unique mitigation measures or follow-up could be required;



- field habitat characterizations to identify rare or important habitats for different stages of the bird's life cycle (e.g., nesting), and habitats for species at risk; and
- surveys where risk or uncertainty related to effects on birds are moderate to high, or where bird presence, population or distribution are poorly understood. Such surveys would greatly inform the assessment of effects.

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## 4.2 Effects to migratory birds

For the assessment of effects on migratory birds and their habitats, the proponent must refer to the requirements of the COMEV directive in section 5.1 Determination and assessment of impacts. These requirements mainly concern the survival and movements of birds, the destruction or modification of their habitats, and species at risk and their habitats.

In addition to the information required in the COMEV directive, and more specifically, for the selected migratory birds, the Impact Statement must describe:

- the likely effect pathways to birds. The proponent must consider the potential for mortality (e.g., collisions, predators) and disturbance (e.g., light, noise, vibration, air emissions, dust and the presence of workers).
- effects to bird habitat (e.g., degradation, destruction) and effects on critical habitat of species at risk.



## 5 Indigenous Peoples

The Impact Statement must demonstrate how impacts on Indigenous Peoples were considered and assessed, including:

- impacts – occurring in Canada and resulting from any change to the environment - on the physical and cultural heritage, the current use of lands and resources for traditional purposes, or any structure, site or thing of historical, archaeological, paleontological or architectural significance;
- any change to the health, social or economic conditions of Indigenous Peoples in Canada; and
- impacts on Indigenous Peoples' rights.

Indigenous groups are best placed to understand how a project may impact them. The assessment of impacts on Indigenous Peoples and their rights must be carried out in collaboration with Indigenous groups, as outlined in the section Indigenous engagement, in the Appendix of these Guidelines. Where relevant, the proponent must collaborate with Indigenous groups to incorporate information from or about them into the assessment of effects on VCs (e.g., biophysical VCs). Thus, the proponent must respect the preferences of each Indigenous group for assessing impacts and discuss with each of them whether it is appropriate to provide its conclusions regarding impacts (residual and cumulative) on Indigenous Peoples and their rights. If an Indigenous group has provided its own conclusion, the proponent may use it in its Impact Statement. Where the proponent's conclusions differ from those of Indigenous groups, they must be clearly documented and justified.

The proponent must engage with all Indigenous groups identified in the Indigenous Engagement and Partnership Plan (IEPP), and describe the outcomes of that engagement in the Impact Statement. In addition, results of engagement must be analyzed and presented separately for each Indigenous group potentially impacted. This group-specific assessment does not need to repeat the entire analysis of each VC but should summarize and present the relevant information for each Indigenous group. To the extent possible, each group-specific assessment must be carried out in the manner that works best for that Indigenous group.

At the request of Indigenous groups, all or parts of the assessment of impacts on Indigenous Peoples and their rights can be combined in a group-specific assessment. For example, effects on the current use of lands and resources for traditional purposes and impacts on hunting, fishing and trapping rights can be assessed together. Indigenous groups may also identify holistic VCs that encompass several environmental, health, social or economic components. Undertaking these assessments together, when requested, will support consistent conclusions. In all cases, the Impact Statement must demonstrate that all requirements have been met.

The proponent should pay particular attention to the links between its assessment of effects on wildlife and navigation, and its assessment of effects on Indigenous physical and cultural heritage, on structures, sites or things of significance, and on the current use of lands and resources for traditional purposes.



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## 5.1 Indigenous physical and cultural heritage and structures, sites or things of significance

The Impact Statement must assess and clearly distinguish the impacts of the Project to physical and cultural heritage from its impact to structures, sites or things of significance. The proponent must take into account the considerations set out in the [Technical Guidance for Assessing Physical and Cultural Heritage or any Structure, Site or Thing](#).

### 5.1.1 Baseline conditions

The Impact Statement must:

- describe the baseline conditions associated with physical and cultural heritage, and with structures, sites or things of significance to Indigenous Peoples;
- describe how past and present developments have affected physical and cultural heritage and the ability to transmit culture; and
- indicate the location of physical and cultural heritage features on maps, if Indigenous groups have shared this information with the proponent and authorized their publication (if required, a coarser geographic resolution can be presented).

Information about heritage and structures, sites or things of significance to Indigenous groups including information identified by Indigenous groups, may include, but is not limited to:

- places of spiritual value, including water bodies and watercourses (particularly the La Grande River watershed);
- landscapes, places, plants, animals (including the woodland caribou, boreal population), objects, persons or features that are sacred, ceremonial or culturally significant; and
- other environmental components identified by Indigenous groups as having heritage value.

Woodland caribou, boreal population, is a species of importance to Indigenous Peoples, both in terms of cultural heritage and in terms of current use of resources for traditional purposes. To inform the impact assessment for caribou-related VCs, the Impact Statement must provide information on the baseline conditions of the boreal woodland caribou population. To this end, the proponent must refer to the requirements of the COMEV directive. The proponent must also consult the [Amended Recovery Strategy for the Woodland Caribou \(\*Rangifer tarandus caribou\*\), Boreal Population, in Canada 2020](#) to complete its description of baseline conditions specific to boreal caribou.

### 5.1.2 Effects on Indigenous physical and cultural heritage and structures, sites or things of significance

The Impact Statement must:



- assess the potential effects to Indigenous groups' natural and cultural heritage, as well as on buildings, sites or things of historical, archaeological, paleontological or architectural significance, including:
  - loss or destruction of physical and cultural heritage;
  - changes to access to physical and cultural heritage sites;
  - changes to the cultural value, spirituality or importance associated with physical and cultural heritage;
  - changes to sacred, ceremonial or culturally significant places, objects or things, languages, histories, cultural transmission and traditions;
  - changes to visual aesthetics over the life of the Project and after project decommissioning; and
  - changes to physical and cultural heritage related to the Project's effects on woodland caribou, and on the La Grande river watershed.
- assess any other effects highlighted by Indigenous groups.

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## 5.2 Current use of lands and resources for traditional purposes

To assess the impacts of its Project on the current use of lands and resources, the proponent must take into account the guidance contained in the [Technical Guidance for Assessing the Current Use of Lands and Resources for Traditional Purposes under CEAA 2012](#).

### 5.2.1 Baseline conditions

When information is provided and validated by Indigenous groups, the Impact Statement must describe baseline conditions related to the current use of lands and resources for traditional purposes, including:

- lands covered by treaties, title areas, land claims or traditional territories (including maps);
- reserves and communities;
- Indigenous conservation and protected areas;
- Indigenous governance systems and Indigenous laws associated with the current use of lands and resources for traditional purposes;
- traditional activities presently or historically practiced (e.g. hunting, fishing, trapping, gathering of plants or medicines, access or travel routes);
- baseline conditions for elements likely to have a sequence of effects on the current use of lands and resources by Indigenous Peoples, with sufficient detail to support the impact assessment, including:
  - species use (magnitude, timing) and availability as country foods or for other traditional purposes. Include a description of each species of importance, including lake sturgeon,



woodland caribou, moose, bear, goose and beaver, and whether their consumption has cultural importance to Indigenous communities, including for medicinal purposes. To describe wildlife resources, with the exception of fish and birds, the proponent must refer to the requirements of the COMEV directive, specifically section 4.2 Description of the environment;

- for fish and birds, refer to the requirements of the section on fish and fish habitat and the section on migratory birds of the Guidelines;
- wherever possible, sites used in the study areas or historically important sites for the collection of country foods must be identified and mapped, such as important fishing sites; and
- navigable waters and their uses, navigable waters users, and existing concerns regarding navigable water use and access;
- any other current use identified by Indigenous groups.

## 5.2.2 Effects to current use of lands and resources for traditional purposes

The Impact Statement must assess the potential effects of the Project on current use of lands and resources for traditional purposes, within the context of historical and current cumulative effects and taking into account likely effect pathways. This includes changes to:

- quality, perception of quality and quantity of resources, and access to them;
  - With regard to the effects on terrestrial wildlife of importance to Indigenous Peoples, including the woodland caribou, the Impact Statement must refer to the requirements of the COMEV directive in section 5.1 Impact identification and assessment to describe and assess the effects of the Project on terrestrial wildlife and its habitat. Note that requirements specific to terrestrial wildlife species at risk are also included in the section on *Canada's capacity to meet its environmental obligations* of these Guidelines;
  - For the woodland caribou boreal population, the assessment of the effects of the Project on the species must take into account the current state of decline as well as the historical state of the population. Also, report on how the Project and mitigation measures will comply with the [Amended Recovery Strategy for the Woodland Caribou \(\*Rangifer tarandus caribou\*\), Boreal Population, in Canada 2020](#).
- the location, frequency, duration or timing of fishing, hunting, trapping, gathering, cultural or ceremonial activities and other traditional practices, including any avoidance of resources due to perceived quality;
- the economic burden and increased time for travelling further to hunt, fish, trap and gather;
- Indigenous groups' efforts to restore traditional practices;
- the experience of being on the land (e.g. sensory and visual disturbance, fragmentation of traditional territory, and any impact on well-being resulting from sensory changes);
- the use of riverbanks, travel ways, navigable waterways and water bodies, including for social and ceremonial purposes, travel or recreation; and



- any other use identified by Indigenous groups.

The Impact Statement must also describe the effects on navigation and navigation safety arising from the following components and activities:

- project components to be built in navigable waters; and
- mining operations that could have an indirect effect on navigable waters.

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## 5.3 Health, social and economic conditions of Indigenous Peoples

Baseline conditions should present health, social and economic conditions in a community-specific, disaggregated manner. Baseline conditions established for Indigenous communities must take into account Indigenous governance regimes and Indigenous laws associated with health and socio-economic conditions.

The proponent should consult the following guidance documents:

- [Analyzing Health, Social and Economic Effects under the Impact Assessment Act](#);
- [Tools and approaches for assessing and supporting public health action on the social determinants of health and health equity](#);
- [Reclaiming Power and Place: The Final Report of the National Inquiry into Missing and Murdered Indigenous Women and Girls](#); and
- [Indigenous Mental Wellness and Major Project Development - Guidance for impact assessment professionals and Indigenous communities](#).

### 5.3.1 Baseline health conditions

The Impact Statement must describe the current state of physical, mental and social well-being. The Impact Statement must:

- develop community health profiles using the definitions of physical, mental and social health and well-being specific to each Indigenous community consulted, where information is available;
- describe the factors contributing to community health that are of interest to Indigenous Peoples, including factors contributing to community resilience and well-being;
- identify and describe the biophysical and social determinants of health relevant to the Project and Indigenous communities, including the approximate location and distance of likely human receptors (including the Cree camps), including foreseeable future and sensitive receptors, that may be affected by changes in air quality, water quality, country foods, and noise and light levels;
- describe sources of drinking water and water used for recreational or cultural purposes;
- describe the level of food security and food sovereignty in Indigenous communities. For further information, please refer to the Public Health Agency of Canada's Food Security website and the [First Nations Food, Nutrition and Environment Study](#).



- describe Indigenous Peoples' access to and consumption of country foods as a health-related behavior (e.g., site-specific consumption studies, [First Nations Food, Nutrition and Environment Study](#)); and
- provide baseline concentration of contaminants in air and drinking water (the proponent must refer to the requirements of the COMEV directive, see section 4.2.2);
  - For country foods used and consumed by Indigenous communities, the proponent must first identify the species or resources for which there is a potential risk of increased contaminant levels, in collaboration with the Indigenous communities potentially affected. If a potential risk is identified, the proponent must assess this risk. The proponent must determine and justify whether existing baseline data can be used, or whether tissue samples or resource should be collected, and if so, determine the best sampling method in collaboration with Indigenous communities.

## 5.3.2 Baseline social conditions

### 5.3.2.1 Community profile

The Impact Statement must include community profiles to understand the context of each Indigenous community. These profiles must include:

- a demographic profile of each Indigenous community consulted, and a list of important socio-cultural values;
- a "Community Well-Being Index" profile for each Indigenous community, using data publicly available on the Indigenous Services Canada website: [Community Well-Being index](#);
- the psycho-social and socio-cultural environment;
- the relevant historical background of the communities;
- applicable history relating to previous proponents and environmental liabilities including hydroelectric projects (impacted water bodies, contamination thresholds, fish consumption recommendations, etc.); and
- any other factors relevant to the Indigenous groups consulted.

The Impact Statement must describe existing local and regional services and infrastructure in the study areas and their capacity, insofar as they relate to the social and health conditions of Indigenous communities.

## 5.3.3 Baseline economic conditions

The Impact Statement must describe:

- the main economic activities of Indigenous Peoples in the study areas, including a description of the use of lands and water bodies for economic purposes;
- an overview of Indigenous businesses that may provide supplies and services required for the Project;



- information on economically active members, including an overview of Indigenous participation in the local and regional workforce;
- the availability of skilled and unskilled workers, and conditions influencing workforce availability during the project timeline;
- workforce development and training plans for Indigenous Peoples; and
- barriers to employment and/or participation in the labor market.

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## 5.4 Effects on the health, social and economic conditions of Indigenous Peoples

The proponent must assess the effects of the Project on human health and on the social and economic conditions of potentially affected Indigenous communities. In particular, the Impact Statement must describe the interactions and interconnections between these effects and other VCs.

### 5.4.1 Effects on health conditions

The Impact Statement must:

- present a health impact assessment, including biophysical and social determinants of health;
- determine whether a human health risk assessment (HHRA) is required, taking into account the following elements:
  - contaminants of potential concern (COPC);
  - current and future human receptors;
  - current and future exposure pathways; and
  - a conceptual site model illustrating the links between COPCs, human receptors and exposure pathways;
- if an HHRA is not carried out, provide justification; and
- if an HHRA is performed, assess all COPC exposure pathways and consider a multimedia HHRA for contaminants with multiple pathways.

The proponent refer to the following guidance [Guidance for Evaluating Human Health Effects in Impact Assessment: Human Health Risk Assessment](#) and describe and quantify the thresholds used in the HHRA, including those for vulnerable populations, and justify any exclusions.

#### 5.4.1.1 Biophysical determinants of health

The Impact Statement must:

- provide an assessment of the potential effects on the health of Indigenous communities, taking into account, in particular, potential changes to:



- air quality, noise exposure and vibration effects. To describe the atmospheric environment, the proponent must refer to the requirements of the COMEV directive, in particular section 5.1 Determination and assessment of impacts;
  - ambient light;
  - the accessibility, availability and current and future quality of country foods;
  - drinking water and water used for recreational and cultural purposes; and
  - any other effects identified by Indigenous groups, if applicable;
- assess the cancer risks associated with human exposure to all the potentially carcinogenic polycyclic aromatic hydrocarbons present in the diesel mixture, and characterize the carcinogenic risk of diesel exhaust;
  - provide a justification if it is determined that an assessment of the potential for contamination of country foods is not necessary, or for any COPC<sup>1</sup> or non-negligible exposure pathways that would be excluded and/or eliminated from the HHRA;
  - document and take into account tolerance thresholds for potential adverse effects on health defined by Indigenous Peoples;
  - describe any project-related changes that could have a positive impact on health (e.g., remediation projects).

#### 5.4.1.2 Social determinants of health

The Impact Statement must assess the impacts on the health of Indigenous Peoples from key social determinants of health, including psychosocial stress factors such as:

- perceived risks to human health and potential avoidance of certain places, water sources or foods due to perceived contamination;
- the resilience and well-being of Indigenous groups;
- public safety concerns (e.g., risks of accidents or malfunctions related to project activities; risks to the health and safety of Indigenous women and girls); and
- disruption of daily activities.

### 5.4.2 Effects on social conditions

#### 5.4.2.1 Effects on community well-being

The Impact Statement must:

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<sup>1</sup> COPC: Any chemical substance whose concentration in an environmental medium is likely to be elevated as a result of project activities may be considered a COPC in the first instance. However, if it is determined that the sum of modeled and background concentrations is below the guidelines, standards or criteria - based on health protection - of the affected environment, the problem statement stage of the risk assessment may conclude that it is not necessary to treat this chemical as a COPC in a quantitative risk assessment.



- assess the potential effects on community well-being taking into account:
  - changes to food security, income inequity and the cost of living;
  - changes resulting from population increase, particularly in terms of accessibility to housing and basic goods and services;
  - risks associated with the disruption of community, family and household cohesion; and
  - the main sectors of local economic activity, including traditional economic sectors.
- assess effects on access, ownership and use of resources (land, minerals, infrastructure, etc.); and
- describe workforce interactions with Indigenous communities, including differential impacts, particularly on women and girls, in the context of the National Inquiry into Missing and Murdered Indigenous Women and Girls.

The Impact Statement must describe the anticipated positive and adverse effects on local and regional services and infrastructure, including access to these services and infrastructure in the study areas insofar as they are related to social conditions.

### 5.4.3 Effects on economic conditions

The proponent should refer to the IAAC guidance document: [Analyzing Health, Social and Economic Effects under the \*Impact Assessment Act\*](#).

The Impact Statement must:

- describe potential changes in employment for Indigenous communities;
- describe potential changes in training opportunities for Indigenous communities;
- estimate the capacity of the local and regional market to meet the demand for employees, and describe the potential risks of labor shortages, taking into account the different phases of the Project and other projects in the region;
- indicate and describe, if applicable and if the communities concerned have agreed to share this information, any agreements on economic benefits concluded or planned with Indigenous groups;
- provide an estimate of the anticipated levels of economic participation for Indigenous groups in comparison to the total Project requirements (e.g., total dollar value of contracts);
- describe the situations where the Project could directly or indirectly create economic hardship or opportunities resulting from changes to the environment, such as job losses or the displacement of businesses to Indigenous communities near the site;
- describe anti-discrimination measures and workforce diversity and inclusion plans, policies and practices; and
- describe any other effects identified by Indigenous groups, if applicable;

The economic information provided will be made available to the public and must not contain confidential business information.



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## 5.5 Rights of Indigenous Peoples

The *Impact Assessment Act* affirms the Government of Canada's commitment to ensure respect for the rights of Indigenous Peoples of Canada, as recognized and affirmed by section 35 of the *Constitution Act, 1982*. The Impact Statement must align with IAAC's guidelines: [Assessment of Potential Impacts on the Rights of Indigenous Peoples - Canada.ca](#). In addition, the proponent must also consult the [Policy Context: Assessment of Potential Impacts on the Rights of Indigenous Peoples](#) and the guidance from IAAC's Indigenous Advisory Committee: [Principles to Guide the Assessment of Impacts to Indigenous Inherent and Treaty Rights](#).

### 5.5.1 Baseline conditions

The Impact Statement must:

- describe the Indigenous and treaty rights of Indigenous Peoples potentially affected by the Project, including historical context, their scope and the importance of the rights to the rights-bearing groups (e.g., practices, customs, beliefs, worldviews and livelihoods);
- document any thresholds identified by the groups which, if exceeded, could adversely affect their ability to exercise their rights in a meaningful way; and
- document the cumulative impacts that already impede or could impede the ability to exercise rights or transmit Indigenous cultures and cultural practices.

### 5.5.2 Impacts on rights of Indigenous Peoples

The proponent, in collaboration with Indigenous groups, must document the potential impacts on Indigenous Peoples' rights, including the severity of the impacts the Project could have, as expressed by the Indigenous Peoples potentially affected. To do so, the proponent must take into account the following elements, where relevant:

- residual impacts on Indigenous Peoples' rights and cumulative impacts;
- the effects of the Project on Indigenous cultures, traditions, laws and governance;
- the Project's impacts on planning, management or stewardship of traditional lands and resources by Indigenous groups;
- how the Project will change the ability of Indigenous groups to derive future economic benefits from, or maintain an ongoing relationship with, the land or water;
- how the Project aligns with the values, political direction and objectives of Indigenous groups in the fight against climate change;
- how the Project and its impacts weaken or strengthen the authority of Indigenous groups on their territory; and
- how the Project affects any other significant components identified by Indigenous groups.



## 6 Contributions to inform decision making

At the decision-making phase of the IAA, should the decision-maker determine that the adverse federal effects that are likely to be caused by the project are likely to be, to some extent, significant, the decision-maker will decide whether they are justified in the public interest in light of the extent to which they are significant and of the factors set out in section 63 of the IAA. The requirements in this section of the Guidelines may inform the analysis of these factors.

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### 6.1 Canada's environmental obligations and climate change commitments

The committee, with the support of federal authorities, will analyze the Project's likely effects in the context of Canada's environmental obligations that apply to the Project, and will analyze the project's GHG emissions in the context of Canada's emissions targets and forecasts. The information gathered during the planning phase, including information regarding the effects of similar development projects, suggests that the project's effects would not contribute to Canada's environmental obligations and climate change commitments. This is due to the Project's footprint on the receiving environment (e.g., habitat loss resulting in adverse effects on biodiversity, Lake 01 diversion) and emissions (e.g., GHG emissions). The effects of the Project could contribute to Canada's environmental obligation and climate change commitments if the Project includes specific initiatives that may result in net contributions (e.g., net positive impacts on biodiversity through habitat recovery, net negative GHG emissions through carbon capture). If the proponent is of the view that the likely effects of the Project may contribute to the Government of Canada's ability to meet its environmental obligations and/or climate change commitments, the proponent is encouraged to substantiate this view by describing these likely effects and the extent of their contribution. This information from the proponent will inform the analysis of whether, if any, federal adverse effects that are likely to be significant are justified in the public interest.

#### 6.1.1 Environmental obligations

Federal environmental obligations relevant to this Project include:

- Canada's Nature Strategy 2030 and other legislations that supports the implementation of Canada's biodiversity commitments, including SARA and the *Canada Wildlife Act* (1985), as well as related policies and guidance documents, such as the Convention on Biological Diversity's Voluntary Guidelines on Inclusive Biodiversity Impact Assessment;
- SARA recovery strategies and action plans for all species at risk potentially affected by the Project;



- the Convention on Wetlands of International Importance Especially as Waterfowl Habitat (Ramsar), as implemented in part under the Federal Policy on Wetland Conservation and related guidance documents such as the North American Waterfowl Management Plan; and
- the Convention for the Protection of Migratory Birds in the United States and Canada, as implemented in part by the *Migratory Birds Convention Act (1994)*, and supporting guidance documents on conservation objectives derived from bird conservation regions and strategies.

The Impact Statement must provide a list of SARA Schedule 1 species likely to occur in project areas and identify the likely effects of the Project on these species and their critical habitat. Refer to the descriptions of effects on listed species provided for CVs in other parts of the Impact Statement, as appropriate. The proponent is also encouraged to refer to the most recent COSEWIC annual report, and to include other species assessed by COSEWIC as extirpated, endangered, threatened or of special concern.

Where the proponent is of the view that the likely effects of the Project contribute to environmental obligations, the proponent is also encouraged to:

- describe the plans and commitments that contribute to the environmental obligations listed above; and
- with respect to Canada's biodiversity obligations as defined in Canada's Nature Strategy 2030:
  - describe and, if possible, quantify the likely changes to biodiversity resulting from the Project;
  - where adverse effects of the Project on species at risk and their critical habitats are likely, identify the measures that will be taken to avoid or mitigate these effects and to monitor them, including measures provided for in any applicable provincial framework;
  - describe whether and how, by applying the mitigation hierarchy, the Project would result in no net loss or net positive impacts on biodiversity; and
  - describe whether and how the likely effects of the Project will contribute to achieving the goals set out in Canada's Nature Strategy 2030.

## 6.1.2 Climate change commitments

Where the proponent is of the view that the likely effects of the Project contribute to Canada's climate change commitments, the proponent is encouraged to describe its plans and commitments accordingly. If the proponent is of the view that the likely effects of the Project contribute to Canada's climate change commitments, the proponent is encouraged to assess the Project's GHG emissions following the [Strategic Assessment of Climate Change](#) (SACC) developed by ECCC, including the draft [Technical Guide on quantification of net GHG emissions, impact on carbon sinks, mitigation measures, net-zero plan and upstream GHG assessment](#). The committee invites the proponent to keep apprised of updates to the SACC and related technical guides published by ECCC. The proponent can also refer to the COMEV directive, more specifically to section 3.9 GHG emissions, climate change and adaptation. The proponent should consider the strategies in place and the efforts made to fight climate change in the Eeyou Istchee region.



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## 6.2 The Project's contribution to sustainability

Sustainability is the ability to protect the environment, contribute to the social and economic well-being of the people of Canada and preserve their health in a manner that benefits present and future generations. The information contained throughout these Guidelines can be used to support sustainability analysis.

### 6.2.1 Extent to which the likely effects of the Project contribute to sustainability

The Impact Statement must provide an analysis of the extent to which the positive and adverse effects likely to result from the Project contribute to sustainability, according to the following steps:

- identify the key VCs from section 1.2 Selection of valued components, as well as any other VC relevant to the well-being of Canadians and local communities (e.g., economic and social benefits), in order to include them in the sustainability analysis;
- establish temporal boundaries, considering how effects on the identified VCs could affect future generations, including beyond the life cycle of the Project; and
- provide an analysis to determine the extent to which likely positive effects and likely negative federal effects make a net positive contribution to sustainability (based on the criteria of no contribution, to low, moderate or high contribution):
  - consider the interconnectedness and interdependence of human-ecological systems;
  - consider the well-being of present and future generations;
  - consider positive effects and reduce the adverse effects of the designated project; and
  - apply the precautionary principle, and consider the uncertainty and the risk of irreversible harm.



# Appendix

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## Section 1 - Methodology

The assessment methodology describes the steps to be taken to assess each VC. This assessment must be carried out on the basis of the likely effect pathways between the Project and the VC, and in consideration of the level of anticipated risk and uncertainty that the project components or activities represent for the VC. The precautionary principle must be taken into account in the assessment of the VC. Additional requirements specific to VCs are described in the Guidelines above. If necessary, the proponent can refer to the additional guidance included as an appendix to [IAAC's Tailored Impact Statement Guidelines Template](#).

### Spatial and temporal boundaries

The Impact Statement must establish and justify the spatial and temporal boundaries used to describe baseline conditions and the assessment of effects on each VC. The proponent must consult Indigenous groups to define the spatial and temporal boundaries.

#### Spatial boundaries

To establish spatial boundaries, the proponent can refer to the requirements of the COMEV directive in section 4.1 Delimiting the study area.

The Impact Statement must:

- describe the spatial limits of each VC and justify each of them, taking into account the following elements:
  - the scale and spatial extent of the Project's effects;
  - the location of potential receptors, including any relevant travel patterns;
  - interactions between VCs;
  - Indigenous Knowledge, scientific knowledge and community knowledge ;
  - the rights of Indigenous Peoples; and
  - the geographical extent of the effects of past, present and reasonably foreseeable projects and activities.
- indicate spatial boundaries on maps; and
- identify where spatial boundaries may extend to areas that are (i) located on federal lands, (ii) in a province other than that in which the Project is carried out, or (iii) outside Canada.

#### Temporal boundaries



The proponent should generally establish two temporal boundaries for the Project; one that encompasses all phases of the Project, and another longer that encompasses the timescale at which cumulative effects may occur, and that may extend beyond the lifecycle of the Project.

The Impact Statement must define the temporal boundaries of each VC, taking into account the following elements:

- schedule of phases of the Project;
- past conditions and historical context;
- seasonal and interannual variability of VCs;
- Indigenous Knowledge, scientific knowledge and community knowledge;
- the rights of Indigenous Peoples;
- relevant physical, technical, ecological, social, health, economic and cultural considerations, from an ecosystem approach; and
- timing of past, present and foreseeable projects and activities.

## Baseline conditions

Baseline conditions are the existing conditions prior to the Project. Baseline conditions include the way in which past projects and activities and present ones have influenced them.

For the baseline conditions of each VC, the Impact Statement must:

- describe baseline conditions and interactions among VCs in a way that makes reliable analysis, extrapolation and forecasting, and predict the effects of the Project on each VC;
- describe changes in baseline conditions that are likely to occur in the future if the Project were not carried out, including future changes due to climate change;
- describe data sources and data collection methods, including sampling, survey and research protocols, modeling methods, software used, any assumptions and statistical estimates of expected values and variances;
- demonstrate that the data sources used are relevant and representative of conditions within the established spatial and temporal boundaries and account for natural variability, especially if surrogate data from representative sites are used rather than specific measurements at the project site;
- indicate the baseline data gaps and the measures taken to address these;
- describe how Indigenous, scientific and community knowledge have been taken into account in determining the baseline conditions;
- where the VC includes a species at risk listed in Schedule 1 of the *Species at Risk Act* that is likely to be affected by the Project:



- provide the common and scientific name of the species, its status on Schedule 1 of SARA and the existence of a recovery strategy, action plan or management plan;
- provide information and/or maps at an appropriate scale for species presence and critical areas such as residences, movement corridors, areas of highest concentration, identified or proposed critical habitat and/or recovery habitat. If applicable, differentiate between federal and non-federal lands;
- identify critical periods (e.g., denning, rutting, spawning); and
- describe the threats and applicable conservation goals outlined in the recovery strategy.

## Effects assessment

The assessment of effects must be based on a comparison between baseline conditions with and without the Project, where these are likely to change over time. Depending on the VC and relevant contextual factors, the description of effects may be qualitative or quantitative, and must take into account the views and concerns expressed by Indigenous Peoples and local communities.

For the assessment of the effects on each VC, the Impact Statement must:

- describe effects based on the likely effect pathways from the project components and activities to the VC, including effects due to accidents and malfunctions;
- describe the analytical methods used to assess effects, including clearly stated assumptions for predictions and how each assumption was tested;
- describe the likelihood of effects occurring, using methods that are statistically and scientifically defensible;
- for quantitative predictions based on models, describe model assumptions, parameters and margins of error, as well as model calibration, validation and performance metrics used;
- if a general rather than detailed description of effects is provided, provide a rationale (e.g., application of standard mitigation measures). The proponent should confirm the rationale with IAAC before submitting the Impact Statement;
- where the VC includes a species at risk listed on Schedule 1 of the *Species at Risk Act*, describe the likely effects on the species (e.g., number of individuals killed, injured, harassed) and its critical habitat (e.g., number of residences destroyed, permanently altered, disrupted) based on likely effect pathways and information in applicable recovery strategies, action plans and management plans. Provide a rationale when effects are not likely;
- describe the interactions between the effects and repercussions on Indigenous Peoples and their rights;
- describe the perspectives, concerns and level of tolerance to effects of Indigenous groups and other participants;
- describe where and how Indigenous Knowledge and community knowledge were considered and integrated; and



- describe where and how Gender-based Analysis Plus (GBA Plus) was applied to assess differences in effects between various population groups.

## Mitigation measures

The Impact Statement must identify mitigation measures that are technically and economically feasible that would, in this order, eliminate, reduce, control or offset federal adverse effects. The proponent is encouraged to follow this mitigation hierarchy in the order listed, exhausting feasible mitigation measures at each level before moving to the next. The proponent may also identify enhancement measures aimed at increasing the positive effects of the Project. The proponent must focus on the mitigation measures required to prevent or mitigate significant adverse federal effects. The Impact Statement must also explain how the Project's impacts on Indigenous rights are mitigated, including through mitigation measures or any additional measures. The proponent is encouraged to provide a stand-alone list of all its commitments to Indigenous Peoples.

For all federal adverse effects, the Impact Statement must:

- describe mitigation measures that are specific to each likely effect pathways for each VC (including effects arising from malfunctions or accidents, effects of the environment on the Project and interactions between effects):
  - mitigation measures that are part of the project design and that are required to achieve the predicted effects;
  - mitigation measures that are proven or to be applied as standard practice;
  - mitigation measures that will contribute to the management of adverse federal effects through the application of federal, provincial, regional or municipal legislative or regulatory frameworks (such as regulations, authorizations, programs and complementary measures). Provide copies of correspondence with provincial, territorial or Indigenous authorities containing their comments on mitigation measures; and
  - any new or innovative mitigation measures proposed;
- describe how mitigation measures may also address impacts on Indigenous Peoples' rights and, if necessary, describe any additional measures to address impacts on Indigenous Peoples' rights;
- describe any mitigation measures or additional measures to a specific or particular Indigenous group;
- document collaboration with, and perspectives from, Indigenous groups on mitigation measures as well as any additional measures to address impacts on the rights Indigenous Peoples, including;
  - how the proponent has addressed the suggestions and recommendations from impacted Indigenous groups,
  - how Indigenous Knowledge was considered, and
  - how the timing of Indigenous activities on the land was considered (e.g., schedule of project activities)
- describe whether and how GBA Plus resulted in differentiated mitigation measures, or additional measures, for diverse population groups to ensure that adverse effects do not disproportionately



affect Indigenous groups or vulnerable population groups. The proponent is encouraged to develop mitigation measures in collaboration with impacted Indigenous Peoples and communities, including diverse and vulnerable population groups;

- where applicable, describe any environmental protection plan or environmental management system for the Project through which the proponent will implement specific mitigation measures;
- if no mitigation is proposed for a likely effect pathway to an adverse federal effect on a VC, explain why mitigation is not possible or necessary;
- with the permission of agreement signatories, indicate whether impacts on Indigenous Peoples and their rights are addressed through an impact and benefits agreement with an Indigenous group; and
- for each mitigation measure for adverse federal effects, and any additional measure to address impacts on Indigenous Peoples' rights:
  - identify the VC(s) and effect pathway(s), or the impact that the mitigation measure addresses;
  - identify the mitigation measure as a commitment, clearly describing how the proponent intends to implement it. Mitigation measures must be specific (including when and where they apply), achievable, measurable (identify thresholds or other quantitative elements) and verifiable, and described in a manner that avoids ambiguity in intent, interpretation and implementation;
  - provide available evidence of the effectiveness of the mitigation measure. The proponent is also encouraged to share available evidence with Indigenous groups. Uncertain or insufficient evidence of effectiveness must be taken into account in the follow-up program, and the effects, should the measures not be effective or malfunction, must be incorporated into the residual effects assessment; and
  - for mitigation measures to avoid or reduce effects on species at risk listed under Schedule 1 of SARA that are likely to be affected by the Project, describe how the mitigation measures are consistent with applicable recovery strategies, action plans and management plans.

## Residual effects assessment

Residual effects are changes to the environment or to health, social or economic conditions, as well as the positive and negative consequences of these changes, which persist or are expected to persist after the implementation of mitigation measures. After considering the technically and economically feasible mitigation measures, the Impact Statement must assess the residual effects on each VC and impacts on Indigenous Peoples and their rights, based on the likely effect pathways from project components and activities to the VC. This analysis must include the residual effects that could arise from accidents or malfunctions and from interactions between effects. Where VCs include a species at risk listed under Schedule 1 of the *Species at Risk Act* that is likely to be affected by the Project, separate analyses must be provided for each species at risk. A conclusion on residual effects must be provided for each VC.



## Cumulative effects assessment

Cumulative effects are changes to the environment and to health, social and economic conditions, that are likely to result from the Project's residual effects in combination with the effects of other past, existing and reasonably foreseeable projects and activities. The Impact Statement must assess the cumulative effects of the Project. As part of this analysis, the proponent is encouraged to use the [Open Science and Data Platform](#) as a tool to access science, data, publications and information about development activities to better understand cumulative effects.

For federal adverse effects and impacts on rights, the Impact Statement must:

- identify the VCs to be included in the cumulative effects assessment, and
  - for which residual effects are likely or anticipated by Indigenous Peoples, or
  - for which residual effects are associated with mitigation measures of uncertain effectiveness;
- include a rationale if a VC is excluded from the cumulative effects assessment. The proponent should consult IAAC before submitting the Impact Statement if VCs are excluded;
- specify which other projects or activities are included in the cumulative effects assessment, including reasonably foreseeable projects or activities, and provide a rationale based on the potential effects of these projects or activities that could interact with the residual effects of the Project;
- assess the cumulative effects on each selected VC, including:
  - the effects of past, existing and future projects and activities, combined with the residual effects of the Project, taking into account how the effects may interact;
  - a comparison of possible future scenarios with and without the Project, reflecting total cumulative effects and not just the Project's contribution; and
  - consideration of any additional mitigation measures specific to cumulative effects on the VC;
- where measures to mitigate cumulative effects are beyond the control of the proponent, identify the parties who have authority to mitigate these effects and summarize the commitments or complementary measures taken by the other parties regarding their implementation and any related communication plan;
- provide a conclusion on cumulative effects for each VC.

The proponent is also invited to consult the IAAC guidance document: [Policy Framework for Assessing Cumulative Effects under the \*Impact Assessment Act\*](#).

## Extent to which federal adverse effects are significant

For federal residual and cumulative adverse effects, the Impact Statement must:

- describe the effect, using criteria most appropriate for the effect, including, where relevant:
  - magnitude;



- geographic extent;
  - timing;
  - duration;
  - frequency;
  - reversibility;
  - social and ecological contexts; and
  - uncertainty;
- indicate whether the effect is likely to be, to some extent, significant and, if so, the extent of significance (i.e. low, moderate or high) by characterizing the extent of significance on a scale ranging from negligible to low, moderate or high significance;
  - provide a rationale for the methodology and choice of quantitative or qualitative criteria used to determine the extent to which the effect is significant. Criteria and relevant benchmarks should be defined and applied with Indigenous groups, including but not limited to the description of impacts on Indigenous Peoples. Criteria may include those identified in the [Guidance: Assessment of Potential Impacts on the Rights of Indigenous Peoples](#) or may include other relevant criteria proposed by an Indigenous group; and
  - identify and explain the sources of information used to characterize the extent to which the effects are significant. The proponent must explain how it took into account the sensitivity and importance of potentially affected VCs, the existence of standards or guidelines, disproportionate effects for diverse population groups as per the GBA Plus, and the perspectives and concerns of Indigenous groups.

## Follow-up program

A follow-up program is designed to verify the accuracy of the impact assessment and determine the effectiveness of mitigation measures. Monitoring is a key part of a follow-up program. Monitoring provides the information needed to verify the accuracy of predictions related to adverse federal effects and determine the effectiveness of mitigation measures, in order to decide whether new actions or modifications to implemented actions are required to protect VCs.

For federal adverse effects on VCs, the Impact Statement must:

- identify the VCs that would be included in the follow-up program, including the rationale for their selection considering the extent of significance of residual and cumulative effects, and the associated uncertainty. Include a description of how Indigenous and community knowledge, as well as the input of relevant authorities and other interested parties were considered in selecting the VCs;
- where the VC includes a species at risk listed on Schedule 1 of the *Species at Risk Act* that may be affected by the Project, describe how the follow-up program is consistent with applicable recovery strategies, action plans and management plans; and
- describe opportunities for Indigenous groups to participate in the development and implementation of the follow-up program and associated monitoring activities, including funding opportunities.



For each VC in the follow-up program, describe:

- the effect predictions and/or mitigation measures that would be assessed as part of the follow-up program;
- the actions the proponent proposes to take if monitoring results show that the effect predictions are inaccurate and/or that mitigation measures are not effective;
- the following preliminary information (e.g. conceptual or presented as options) concerning the monitoring program:
  - the proposed monitoring methodology, including a description of how Indigenous and community knowledge and input from relevant authorities and other interested parties have informed the choice of methodology; and
  - the entity responsible for implementing the monitoring program and the system of accountability;
- if applicable, whether and how disproportionate effects identified in the GBA Plus would be addressed.

If the proponent considers that existing or planned monitoring activities under other regulatory instruments could provide the data necessary to achieve the objectives of the follow-up program for a particular VC, the Impact Statement must include a justification for the use of data from these other monitoring activities.

The proponent should consider the use of adaptive management to address uncertainties in impact predictions or the effectiveness of mitigation measures. Adaptive management does not eliminate the need to provide sufficient information to assess effects on VCs and identify mitigation measures.

## Uncertainties and biases

The Impact Statement must provide a description of uncertainties and biases where these may have a meaningful impact on the conclusions of the effects on each VC. The Impact Statement must:

- describe the main sources of uncertainty, including uncertainty arising from:
  - limitations on the accuracy, precision, completeness and reliability of data;
  - environmental variability, including spatio-temporal variability;
  - extrapolations from other contexts (e.g., baseline conditions extrapolated from other locations, periods, populations or communities);
  - extrapolations from proxy measures or indicators to VCs themselves; and
  - model limitations arising from incomplete or imperfect knowledge of the structure or function of the system being modelled;
- provide a quantitative (if possible) or qualitative estimate of the magnitude of the main sources of uncertainty and provide a rationale for these estimates, or explain why no estimate is possible;
- describe main sources of bias in the design, execution or interpretation of studies or analysis;



- provide a quantitative (if possible) or qualitative estimate of the direction and magnitude of the main sources of scientific bias, and provide a rationale for these estimates or explain why no estimate is possible;
- describe the potential implications of estimated uncertainty and bias, cumulatively (i.e. the total uncertainty and bias resulting from the sources identified);
- describe approaches used or likely to be used to reduce sources of uncertainty or bias associated with conclusions about effects (e.g., additional data collection or research); and
- describe how the precautionary principle has been applied and any precautionary approaches that have been used in assessing effects or developing mitigation measures.

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## Section 2 - Information about the proponent

To provide the information required for the proponent's presentation, the proponent must refer to the requirements of the COMEV directive in section 1.1 Presentation of the proponent.

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## Section 3 - Public consultation and participation

The Impact Statement must describe the proponent's current and proposed public engagement activities for the Project. To provide the information required for public consultation and participation, the proponent must refer to the requirements of the COMEV directive in section "III Basic principles / Consultation and communications".

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## Section 4 – Indigenous engagement

The proponent must engage Indigenous Peoples as early as possible, and throughout the impact assessment process, to understand the potential impacts of the Project on Indigenous Peoples and their rights, to identify measures to avoid or minimize these impacts, and to integrate Indigenous Knowledge into the impact assessment. Engagement could also identify potential positive impacts, such as measures that could improve the baseline conditions that support the exercise of rights.

The engagement efforts should be consistent with the Government of Canada's commitment to implement the United Nations Declaration on the Rights of Indigenous Peoples (the Declaration) as a comprehensive international human rights instrument and Canada's roadmap for reconciliation. The Declaration emphasizes the importance of recognizing and upholding the rights of Indigenous peoples and ensuring that there is effective and meaningful participation of Indigenous groups in decisions that affect them, their communities and territories. The Declaration also emphasizes the need to work together in partnership and respect, as articulated through the principle of free, prior and informed consent. This principle reflects working together in good faith on decisions that impact Indigenous peoples, with the intention to achieve consensus.



Engagement should also be consistent with jurisprudence and best practices in respect of implementing the common law duty to consult. The Indigenous Engagement and Partnership Plan (IEPP) identifies Indigenous communities that the Crown will consult with to understand the concerns and potential impacts of the project on their exercise of potential or established Aboriginal or Treaty rights and, where appropriate, make accommodations. The degree of engagement with each community will vary and in general, will be proportionate to the evidence provided by Indigenous groups regarding potential pathways of impact from the project on Aboriginal or Treaty rights. Engagement is also conducted for other purposes, including as an opportunity to learn about and further explore Indigenous community interests in a project, or to understand other potential project effects not directly related to the exercise of Aboriginal or Treaty rights.

Engagement with Indigenous groups must involve ongoing information sharing and collaboration between the proponent and Indigenous groups to contribute to the development and validation of conclusions and assessment findings related to potential impacts and pathways of effects to Indigenous peoples and impacts on the rights of Indigenous peoples. The results of any engagement with each Indigenous group must be presented in the Impact Statement, and, as best as possible, convey the perspective of the Indigenous groups being engaged. The record of engagement and inclusion of Indigenous knowledge in the Impact Statement should demonstrate that the proponent sought to build consensus and obtained the agreement from specific Indigenous groups regarding information specifically pertaining to those Indigenous groups that is presented in the Impact Statement.

Ethical guidelines and culturally appropriate protocols for research, data collection and confidentiality must always be followed. Engagement must be conducted with integrity and transparency, free from conflict of interest, in good faith and in a way that is sensitive to the concerns of the groups involved, so as to produce mutually beneficial results.

The proponent must:

- engage with all Indigenous groups identified in the IEPP. The proponent's level of engagement with each potentially affected Indigenous group may vary according to the severity of impacts on Indigenous groups and their rights. The level of engagement and corresponding opportunities offered to each Indigenous group should be determined with the Indigenous groups;
- share information in the formats requested by the groups to ensure that it is accessible and understandable;
- solicit comments to define and apply criteria and thresholds to describe these impacts;
- engage Indigenous groups to determine preferred measures to avoid, minimize, compensate or accommodate impacts on their rights, and to optimize the Project's benefits for their communities;
- work with Indigenous groups to validate the results of the assessment of the Project's potential impact on Indigenous Peoples and their rights;
- contextualize information about Indigenous group members (e.g., women, men, elders, youth, people with reduced mobility, two-spirited people);
- ensure that Indigenous groups have the opportunity to review and comment on information prior to submission of the Impact Statement;



- incorporate comments from Indigenous groups, including where and how disagreements have been addressed for each group, into the final document;
- support the participation of Indigenous groups in the preparation of the Impact Statement. This support could include funding for studies conducted by potentially affected groups. The proponent should include any specific studies or assessments provided by Indigenous groups, if permission has been obtained from the Indigenous group concerned to publish them; and
- demonstrate that the capacity of Indigenous groups has been taken into account and that timelines have been adequately communicated and are sufficiently flexible to ensure that Indigenous groups have the capacity to review and understand the information contained in the Impact Statement, including, where appropriate, specific process for providing information for sections of the Impact Statement.

The proponent must demonstrate that genuine efforts, tailored to each indigenous group and sustained over time, have been made to engage groups that do not wish to collaborate with the proponent, and provide the IAAC with an explanation of the circumstances under which collaboration was not possible. Unless Indigenous groups indicate otherwise, the proponent must continue to share information and analyses with Indigenous groups identified in the IEPP, even those not involved in the impact assessment, and must rely on public sources of information to support the assessment.

## Indigenous Knowledge considerations

Indigenous Knowledge<sup>2</sup> is holistic and should be brought together on equitable footing with scientific or technical information. It must inform the Impact Statement, including the selection of VCs, the assessment of environmental effects and changes to health, social and economic conditions, Indigenous governance and resource use, as well as the assessment of impacts on Indigenous Peoples' rights and the identification of mitigation measures. It is important that Indigenous Knowledge, where available to the proponent, is incorporated into the Impact Statement for each of these aspects, not only to assess the potential impacts of the Project on Indigenous groups. It is also important to understand the context in which Indigenous groups share this knowledge, and to ensure that it is transmitted in a culturally appropriate manner.

The proponent must indicate where Indigenous Knowledge provided has not been included in the Impact Statement and provide a rationale. Where conclusions differ between Indigenous Knowledge and other scientific or technical studies, the proponent must clearly present how both have been taken into account in the Impact Statement.

The [Guidance: Protecting Confidential Indigenous Knowledge under the \*Impact Assessment Act\*](#), to which the proponent must refer, describes the approaches to be adopted. The proponent should also consult the IAAC guidance document titled [Guidance: Indigenous Knowledge under the \*Impact Assessment Act\*](#).

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<sup>2</sup> The Government of Canada recognizes that Indigenous Peoples refer to their knowledge in different ways, characteristic of their unique languages. In the context of these guidelines, the term "Indigenous knowledge" is used to refer to all modes of Indigenous knowledge. The proponent is encouraged to respect the terminology preferences of the Indigenous communities involved in the assessment.



## Record of engagement

The Impact Statement must provide a record of engagement that describes all the proponent's efforts to seek the views of each Indigenous group likely to be affected by the Project.

The record of engagement in the Impact Statement must include:

- the list of Indigenous groups engaged by the proponent, including those whose engagement was unsuccessful;
- a description of the engagement activities and efforts undertaken with each Indigenous group and the results of engagement, including, where relevant, the date and the means used (e.g., in person, virtually, by teleconference, etc.);
- a description of how information was communicated to each group, based on preferred methods of receiving information and solutions implemented for people and locations where technological resources are limited or where language barriers exist (e.g., translation of documents or summaries into Indigenous languages);
- Indigenous groups' perspectives on how they wish to be engaged by the proponent and how these perspectives have been taken into account. The proponent must include, if the groups agree, any engagement policies or plans developed with Indigenous groups or by the proponent;
- a detailed description of the main issues, questions and comments raised by each Indigenous group during engagement activities and the proponent's responses, including how the issues have been addressed in the Impact Statement or will be addressed in the future;
- an explanation of any unsuccessful engagement efforts; and
- a description of the progress made by the proponent in obtaining the free, prior and informed consent of Indigenous groups, as identified by the Indigenous groups themselves, where Indigenous groups have agreed to include this information in the Impact Statement.

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## Section 5 - Impact Statement Summary

The proponent must prepare and submit to IAAC a stand-alone plain-language summary of the Impact Statement in both French and English. The proponent should consider translating the Impact Statement in Indigenous languages. The summary must contain sufficient details for the reader to understand the Project and its adverse federal and impacts on Indigenous Peoples and their rights. The Impact Statement Summary provides an opportunity for the proponent to demonstrate through a plain-language narrative how it addressed issues raised, notably by Indigenous groups and the public. The summary must include key maps or figures illustrating the location and key components of the Project, and may use a series of tables to summarize the information.

The Summary of the Impact Statement must include the following information:



- each residual and cumulative adverse federal effect, as well as the mitigation measures planned to address them;
- impacts on Indigenous Peoples and their rights, as well as planned mitigation measures or any additional measures to address them;
- where applicable, proposed enhancements to increase the positive effects of the Project;
- any commitments made by the proponent or recommendations made to other parties;
- whether the adverse federal effects caused by the carrying out of the Project are likely to be, to some extent, significant and, if so, the extent to which they are significant;
- the extent to which the effects that are likely to be caused by the Project contribute to Canada's ability to meet its environmental obligations and its commitments in respect of climate change;
- the extent to which the effects that are likely to be caused by the Project contribute to sustainability; and
- the follow-up program.