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Madeline Clarke
Project Manager, Atlantic Region
Impact Assessment Agency of Canada

Submitted by email: Marshdale@iaac-aeic.gc.ca

28 January, 2026

Subject: NRCan Federal Authority Advice Record for the Marshdale Natural Gas Power Facility Project

On January 5, 2026 Natural Resources Canada (NRCan) received your request to review the Initial Project Description (IPD) and to submit a completed Federal Authority Advice Record form (FAAR) for the Marshdale Natural Gas Power Facility Project.

Pursuant to section 23 of *Impact Assessment Act* (IAA 2019), NRCan is participating in the impact assessment of the Marshdale Natural Gas Power Facility Project. NRCan has reviewed the Initial Project Description (IPD) with regards to its mandate and expertise in the areas of hydrogeology (groundwater quantity and flow; groundwater-surface water interactions), hazards and explosives. Please see NRCan's comments on the IPD in attached Appendix 1 (Federal Authority Advice Request).

Additionally, NRCan recommends informing the Proponent that the [Open Science and Data Platform](#) (OSDP) led by Natural Resources Canada provides access to diverse science, data and regulatory information that could be used to inform the assessment. This centralized data hub can guide the Proponent to support early planning and help align project proposals with regulatory expectations for faster and more efficient reviews. For example, the [Groundwater Regions of Nova Scotia](#) - (Government of Nova Scotia) is just one example of data that may be of interest. NRCan is available to meet with the Proponent to share in greater detail the information accessible through the Platform to help inform this review. The team can be reached at osdp-psdo@nrcan-rncan.gc.ca.

If you have any questions, comments, or concerns, please don't hesitate to contact me at shelley.ball@nrcan.rncan.gc.ca.

Sincerely,

Canada 

Shelley Ball

Senior Impact Assessment Officer
Impact Assessment Division, Office of the Chief Scientist
Natural Resources Canada

CC: Peter Unger, Team Lead, Impact Assessment Division
Sonja Kosuta – Senior Director, Impact Assessment & Science Capacity

Appendix 1 Federal Authority Advice Record Marshdale Natural Gas Power Facility Project

NRCan Appendix 1 - Federal Authority Advice Request Salt Springs Natural Gas Power Facility Project

Federal Authority Advice Record (FAAR)

FAAR Response must be submitted by January 28, 2026

Marshdale Natural Gas Power Generation Facility Project – Independent Energy System Operator – Nova Scotia.

Registry File: [90111](#)

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|-------------------|--|
| Department/Agency | Natural Resources Canada |
| Lead Contact | Shelley Ball, Senior Impact Assessment Officer |
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1. Will your department or agency exercise a **power, perform a duty or function**, or provide **financial assistance**, related to the project to enable it to be carried out in whole or in part?

As relevant,

- a) Specify the power, duty or function, or financial assistance, and the likelihood that it will be required to construct the project, based on the Initial Project Description, as either Required, Potential, Likely, Unlikely or Not Required

No licence will be required from NRCan to allow the project to be carried out.

- b) Describe any associated Indigenous or public consultation, including timelines

NRCan does not anticipate consulting the Indigenous communities potentially affected by the project.

- c) Describe any associated information requirements (e.g., alternative means assessment, habitat offsetting), and specify those that may be coordinated with the impact assessment process, if an impact assessment is required

NRCan has no associated information requirements for this project.

- d) Identify any associated project-specific guidance or issues of which the proponent should be aware, or information the proponent should provide

NRCan has not identified any associated-specific guidance, issues the proponent should be aware of, or information the proponent should provide.

- e) Indicate whether your department or agency has identified any power that it will not be exercising or may not be able to exercise to allow the project to be carried out, in whole or in part.

Not Applicable.

2. **Using Table 1**, identify project- and context- specific **key issues**, based on the expertise within your mandate¹ and the information in your possession, including the Initial Project Description, any exchanges with the proponent or others related to the project and known means to address the effects of the project. For each key issue:
 - a) Specify the key issue (e.g., specific species and location)
 - b) Specify the project component or activity linked to the key issue
 - c) Explain why it's a key issue based on:
 - i. biophysical effect pathway(s) from the specific project component or activity
 - ii. concern unique to the project or a priority within your mandate
 - iii. the issue being material² to decision making under the *Impact Assessment Act*
 - d) Identify how the issue could be resolved, including through means other than an impact assessment
 - e) Identify additional information the proponent could provide including to give confidence on how the issue can be addressed through other means.

Contact:
Shelley Ball, Senior Impact Assessment Officer
Office of the Chief Scientist
Natural Resources Canada

28 January, 2026

¹ Refer to the [Memoranda of Understanding with IAAC](#).

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

Table 1: Key Issues to inform the impact assessment process

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

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

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

| Comment ID | a) Key issue | b) Project component or activity | c)(i) Biophysical effect pathway(s) | c)(ii) Concern unique to the project or a priority within your mandate | c)(iii) Material to federal decision-making | d) Means for issue resolution | e) Additional information from the proponent |
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| <p><i>Identify comments by organization and comment number.</i></p> <p><i>e.g.: IAAC-01</i></p> | <p><i>Specify the key issue (e.g., specific species and location).</i></p> | <p><i>Identify the project component or activity linked to the key issue.</i></p> <p><i>Be specific about the nature, scale, novelty and complexity or the component or activity.</i></p> | <p><i>Identify the specific biophysical effect pathway between the project component or activity and the affected environmental or human receptor (including Indigenous Peoples).</i></p> | <p><i>Describe why it's a key issue within the mandate of your department or agency, including in terms of priorities of the federal government and in terms of anticipated likelihood, severity or uncertainty of effects.</i></p> <p><i>Identify if the key issue is common for projects of this nature or in this sector, or whether it's unique to this project due to its complexity, size or novelty; a sensitive or rare receiving environment; and/or proximity of sensitive environmental or human receptors (including Indigenous Peoples).</i></p> | <p><i>Describe why the key issue is material to decision-making as either:</i></p> <ul style="list-style-type: none"> • <i>an adverse effect within federal jurisdiction, or a direct or incidental adverse effect, that may be significant based on available evidence including:</i> <ul style="list-style-type: none"> ○ <i>federal experts' knowledge and experience with past project assessments;</i> ○ <i>presence of sensitive species, habitats or human receptors (including Indigenous Peoples);</i> ○ <i>novel or complex project activities, components or technologies;</i> ○ <i>high uncertainties in effects or in the effectiveness of mitigation measures;</i> ○ <i>unknown or unproven mitigation; or</i> • <i>a factor for the justification in the public interest anticipated to be material to decision-making such as a likely positive effect contributing to sustainability, to Canada's environmental obligations or climate change commitments or in supporting governmental priorities, such as reconciliation with Indigenous Peoples.</i> | <p><i>Describe how the key issue could be resolved or addressed by:</i></p> <ul style="list-style-type: none"> • <i>Any means, including powers, duties, functions, frameworks, policies or guidance that your department or agency has;</i> • <i>Any means, including powers, duties, functions, frameworks, policies or guidance from another jurisdiction, including the province;</i> • <i>Common, proven, well-understood or standard mitigation measures to mitigate the effect or effect pathway(s); or</i> • <i>Commitments made by the proponent (e.g., in the Initial Project Description).</i> | <p><i>Describe information the proponent can provide, or commitments the proponent can make, in their Response to the Summary of Issues that would provide confidence that the issue can be resolved by existing means.</i></p> <p><i>Consider whether information, studies, analyses or collaborative work with other authorities would be required to address the issue beyond existing means.</i></p> |
| <p>NRCan-01</p> | <p>Geophysical environment</p> | <p>Interaction with the geophysical environment</p> | <p>Groundwater-surface water interaction; hazards</p> | <p>Groundwater quantity; hazards</p> | <p>Direct or incidental adverse effect as it relates to the groundwater and natural hazards</p> | <p>The proponent has indicated they are working on the groundwater assessment that will include all the relevant features with respect to groundwater quantity and hydrogeological properties. It will also include groundwater-surface water interaction and other necessary details (groundwater wells/flow, hydraulic conductivity, and expected impacts of groundwater-surface water interactions).</p> <p>The proponent has indicated that this project area has a medium to high risk for karst risk. More information on the karst terrain and its impacts will be provided as the project moves forward.</p> | <p>NRCan looks forward to receiving the information on the groundwater quantity, and natural hazards as the project moves forward</p> <p>Karst information as it relates to the project activities will also be provided as the project moved forward.</p> |

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| | | | | | | <p>The proponent has indicated low geological hazards in the project area. NRCan suggests that a justification be provided for their assessment.</p> <p>NRCan recommends including a discussion of potential effects from earthquakes in the region.</p> <p>The National Building Code Seismic Hazard Tool can be used to obtain seismic hazard design values for various editions of the National Building code. It is the responsibility of the proponent to determine the appropriate site class and which version of the seismic hazard tool is applicable to the project's location at the time of design.</p> | <p>NRCan has provided the link for seismic hazard assessment (see previous column) to help the proponent assess the site.</p> |
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Please insert additional rows as necessary.