

**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](#)

Department/Agency	Health Canada
Lead Contact	Jérémie Allain
Full Address	101 Roland-Therrien Boulevard Longueuil, Quebec, J4H 4B9, Canada Building MONTÉRÉGIE PLACE, Floor 4
Email	<a href="mailto:jeremie.allain@hc-sc.gc.ca">jeremie.allain@hc-sc.gc.ca</a>
Telephone	514-213-1846
Alternate Contact	Beverly Ramos-Casey – <a href="mailto:beverly.ramos-casey@hc-sc.gc.ca">beverly.ramos-casey@hc-sc.gc.ca</a> - 902-403-9658 Lauchie MacLean - <a href="mailto:Lachlan.Maclean@hc-sc.gc.ca">Lachlan.Maclean@hc-sc.gc.ca</a> – 782-409-3340

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

As relevant,

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

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

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

- Specify the key issue (e.g., specific species and location)
- Specify the project component or activity linked to the key issue
- Explain why it's a key issue based on:
  - biophysical effect pathway(s) from the specific project component or activity
  - concern unique to the project or a priority within your mandate
  - the issue being material<sup>2</sup> to decision making under the *Impact Assessment Act*
- Identify how the issue could be resolved, including through means other than an impact assessment
- Identify additional information the proponent could provide including to give confidence on how the issue can be addressed through other means.

Jérémie Allain  
Name and title of Departmental /  
Agency Responder

January 28, 2026  
Date

<sup>1</sup> Refer to the [Memoranda of Understanding with IAAC](#).

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

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

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

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

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

Comment ID	a) Key issue	b) Project component or activity	c)(i) Biophysical effect pathway(s)	c)(ii) Concern unique to the project or a priority within your mandate	c)(iii) Material to federal decision-making	d) Means for issue resolution	e) Additional information from the proponent
<p>Identify comments by organization and comment number.</p> <p>e.g.: IAAC-01</p>	<p>Specify the key issue (e.g., specific species and location).</p>	<p>Identify the project component or activity linked to the key issue.</p> <p>Be specific about the nature, scale, novelty and complexity or the component or activity.</p>	<p>Identify the specific biophysical effect pathway between the project component or activity and the affected environmental or human receptor (including Indigenous Peoples).</p>	<p>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.</p> <p>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).</p>	<p>Describe why the key issue is material to decision-making as either:</p> <ul style="list-style-type: none"> <li>• an adverse effect within federal jurisdiction, or a direct or incidental adverse effect, that may be significant based on available evidence including:                             <ul style="list-style-type: none"> <li>○ federal experts' knowledge and experience with past project assessments;</li> <li>○ presence of sensitive species, habitats or human receptors (including Indigenous Peoples);</li> <li>○ novel or complex project activities, components or technologies;</li> <li>○ high uncertainties in effects or in the effectiveness of mitigation measures;</li> <li>○ unknown or unproven mitigation; or</li> </ul> </li> <li>• 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.</li> </ul>	<p>Describe how the key issue could be resolved or addressed by:</p> <ul style="list-style-type: none"> <li>• Any means, including powers, duties, functions, frameworks, policies or guidance that your department or agency has;</li> <li>• Any means, including powers, duties, functions, frameworks, policies or guidance from another jurisdiction, including the province;</li> <li>• Common, proven, well-understood or standard mitigation measures to mitigate the effect or effect pathway(s); or</li> <li>• Commitments made by the proponent (e.g., in the Initial Project Description).</li> </ul>	<p>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.</p> <p>Consider whether information, studies, analyses or collaborative work with other authorities would be required to address the issue beyond existing means.</p>
<p>HC-01</p>	<p>Exposure of Indigenous peoples to Contaminants of Potential Concern (COPCs) and noise, if the area surrounding the project site is identified as important for traditional land use activities.</p>	<p>Construction and operation of the 300 MW natural gas-fired power generation facility may generate project-related emissions including:</p> <ul style="list-style-type: none"> <li>• air pollutant emissions from combustion of natural gas or ultra low sulfur diesel; and</li> <li>• noise emissions from construction noise</li> </ul>	<p>Indigenous receptors engaging in traditional land use activities can be exposed to COPCs via multiple environmental media (e.g., inhalation of NOx in air) during construction and project operations.</p>	<p>Under the <i>Impact Assessment Act</i> (IAA), Health Canada (HC) provides specialist or expert information and knowledge to support the assessment of impacts on the health of Indigenous peoples.</p> <p>The size of the project is comparable to natural gas power generating projects in the Atlantic Region. HC does not have</p>	<p>As per <i>Impact Assessment Act</i> Sections 2(e) and 2(f), non-negligible adverse effects on the health of Indigenous peoples related to the Project falls within federal jurisdiction.</p> <p>The Initial Project Description (iPD) document indicates that the closest First Nation community is Boat Harbour West Indian Reserve No. 37, which is part of the Mi'kmaq Pictou Landing First Nation (PLFN) (a Mi'kmaq community) located approximately 23.5 km southwest of the project. The proponent's consultation with indigenous communities (Section 5.1) indicates that the PLFN identified concerns regarding the project, including the environmental impact and requested to be informed regarding the planned</p>	<p>A list of mitigation measures is provided in Sections 7.1.3; 7.3.3 and 8.6, which could alleviate the potential risks from the pathways listed in column c) i). Standard mitigation may be sufficient to address the project effects outlined if designed through meaningful Indigenous engagement.</p> <p>As indicated in the Sections 5.1.2 and 13.5, the Proponent commits to continue its engagement with the Mi'kmaq communities to better inform the project's impacts and make required changes to minimize the impacts of the projects on their rights and interests.</p>	<p>As indicated in column d), the proponent will continue to gather information regarding traditional activities via consultation with the Indigenous communities and has committed to produce a MEKS in early 2026. This information could serve as a basis for future studies that may be needed to adequately assess the</p>

		<p>(e.g., potential blasting) and operational noise such as: turbines, generators, engines, etc.;</p> <ul style="list-style-type: none"> <li>• COPCs in sediment runoff and effluent discharge from the project site and mobilisation of COPCs due to soil disturbance in groundwater (e.g.: through blasting, if required).</li> </ul>		<p>knowledge of the receiving environment being sensitive or rare; however, further engagement with Indigenous peoples may help confirm the value of the surrounding environment for historical, present or future traditional land resource use activities.</p>	<p>Environmental Assessment (EA) studies and the Mi'kmaq Ecological Knowledge Study (MEKS).</p> <p>Section 13.1 of the iPD states that changes to the environment surrounding the project area is expected and "<i>potential impacts to the Mi'kmaq are anticipated to be localized to the Project Area and directly surrounding lands</i>". The location of Indigenous receptors and the traditional land use activities surrounding the project area will inform the significance determination of potential risks to Indigenous health.</p>	<p>Please note it is currently uncertain whether a provincial EA will provide the means to resolve the key issue (i.e., whether it will require the evaluation of potential health risks to Indigenous receptors if they are engaging in traditional land and resource activities in the vicinity of the project).</p> <p>HC supports the Proponent commitment to implement a noise complaint resolution plan. The implementation of this plan, in tandem with a communication plan with the communities, is another approach to monitor any emerging issues experienced by the community members or exceedances that are not captured by monitoring programs.</p>	<p>risk to Indigenous health.</p>
--	--	---	--	--	--	--	-----------------------------------

Please insert additional rows as necessary.