

Enclosure 1: Federal Authority Advice Record for the Impact Assessment

Department Contact Information

Submission Date	2026-05-29
Department/Agency	Transport Canada
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1. Taking into account the Project Context and Targeted Questions that IAAC has shared, review Batch 3 of the Impact Statement and provide views for IAAC's consideration in the analysis of the project's effects and preparation of the Impact Assessment Report (Table 1) or identify potential outstanding information requirements in the Impact Statement (Table 2). Tables 1 and 2 (attached) provide additional guidance to support your review.
2. As per the Cooperation Plan¹, consider all the mechanisms in place to manage potential federal effects. If your department is responsible for, or aware of, any relevant federal legislative frameworks, policies, programs, or potential complementary measures² that may help manage the project's potential adverse federal effects, please specify and describe applicability to the project and any known limitations to managing effects.
3. Indicate whether your department has identified any power that it will be unable, or may be unable, to exercise to allow the project to proceed, in whole or in part as currently planned, and next steps to resolve any issues.

N/A

4. Indicate if any proponent information provided in Batch 3 of the Impact Statement changes the previous guidance provided on permitting. If yes, please provide an overview of the new permitting guidance. Please note that the Detailed Permitting Plan will be updated accordingly.

N/A

Jeremy Craigs

Name of Departmental / Agency Responder

Environmental Advisor, Environmental Programs, Ontario, Prairies and Northern Region

Title of Responder

2026-05-29

Date

¹ <https://iaac-aeic.gc.ca/050/evaluations/document/158179>

² Complementary measures are additional authorities of government officials or programs that may be used to mitigate effects that may be beyond the care and control of the proponent. They can be taken into account in decision-making.

Table 1. Views to Inform the Impact Assessment

Table 1 should be used to provide views for IAAC's consideration in the analysis of the project's effects³ and preparation of the Impact Assessment Report and potential conditions. Expert advisors should consider project context (see Enclosure 2 for more detail on the key issues and targeted questions) and regulatory context and provide risk-proportional, solution-oriented advice even where potential gaps in the Impact Statement are observed.

Comment ID	Reference to Impact Statement	Description of View or Concern Related to an Effect	Advice to Inform the Impact Assessment
<p>Please identify comments by organization and comment number.</p> <p>e.g.: HC-01</p>	<p>Identify the specific section of the Impact Statement to which your comment applies.</p>	<p>Provide a brief description of the view or concern for IAAC's consideration in the analysis of effects, based on available information, such as:</p> <ul style="list-style-type: none"> • a missing pathway of an adverse federal effect that may really increase the overall extent of significance; or • sources of uncertainty that, in your department's view, may weaken potential conclusions. 	<p>Considering project context (see Enclosure 3 for more detail on the key issues and targeted questions) and regulatory context, provide solution-oriented advice for the impact assessment. For example:</p> <ul style="list-style-type: none"> • Characterize residual effects and the level of uncertainty with predictions in the absence of more information from the Proponent, as predicted by your department. Explain the uncertainty. Consider describing the range of possible scenarios. • Suggest other mitigation and follow-up measures that may increase certainty in predictions or help manage uncertainty for adverse federal effects, including operational guidance or standards, and well-understood practices. • Describe any other federal or provincial legislative frameworks, policies, programs, and potential complementary measures that may provide another means to address adverse federal effects, or considerations related to the public interest factors, including predictable outcomes and whether other tools set conditions on the Proponent. • Identify those mitigation measures and project design elements that are necessary to limit the extent of significance of adverse federal effects, and those follow-up program measures that are necessary to address substantial uncertainty with the accuracy of predictions and the effectiveness of mitigation, in relation to key issues that are material to decision-making. • Provide advice on risk (likelihood and severity of effects), using applicable frameworks relevant to your mandate, to support IAAC's risk-based decisions. • Provide any additional considerations in relation to the Project's contributions to sustainability or to Canada's environmental obligations and climate change commitments. • Provide any additional considerations in relation to IAAC's obligations under section 79 of the Species at Risk Act. <p>In the event of cross-cutting issues or a shared mandate/expertise with another agency or department, please specify the agency/department and contact persons.</p>
N/A	N/A	N/A	N/A

³ "Effects" means adverse effects within federal jurisdiction and direct or incidental adverse effects (as defined in section 2 of the IAA), and considerations related to the public interest factors (as defined in section 63 of the IAA). Advice is also invited in relation to IAAC's separate obligations under section 79 of the *Species at Risk Act*.

Table 2. Identification of Outstanding Information Requirements and Clarifications in Relation to the Requirements of the Tailored Impact Statement Guidelines

Table 2 should be used to identify potential outstanding information requirements in the Impact Statement where information from the proponent is **both** 1) missing or unclear as prescribed by the Tailored Impact Statement Guidelines **and** 2) necessary to formulate advice (Table 1) to IAAC on matters that are likely to be material and relevant to decision-making⁴. Expert advisors should consider project context (see Enclosure 2 for more detail on key issues and targeted questions) and regulatory context and provide risk-proportional, solution-oriented advice.

Outstanding Information Requirement ID	Reference to Impact Statement	Reference to Tailored Impact Statement Guidelines	Description of Outstanding Information Requirement (Context and Rationale)	Advice to Proponent for Resolving the Outstanding Information Requirements
<p>Please identify information requirement by organization and comment number.</p> <p>e.g.: HC-02</p>	<p>Identify the specific section of the Impact Statement related to the information requirement</p>	<p>Identify the specific section of the Tailored Impact Statement Guidelines related to the information requirement</p>	<p>Provide a brief description of the outstanding information requirement in the Impact Statement, including:</p> <ul style="list-style-type: none"> • why the information or studies are required to formulate advice to IAAC on matters that are likely to be material and relevant to decision-making. <p>Include, where relevant:</p> <ul style="list-style-type: none"> • how the outstanding information requirement relates to an adverse federal effect or to a public interest factor including outlining the relevant pathway of effect (see Enclosure 3 for more detail on the key effects and targeted questions); • identify the level of concern about the outstanding information and implications or consequences for strength of conclusions; and • advice to IAAC on risk (likelihood and severity of effects), using applicable frameworks relevant to your mandate. <p>Identify if the outstanding information requirement links to specific advice provided to IAAC in Table 1.</p>	<p>Provide a clear and precise description of the missing information or clarification that would resolve the issue detailed at left.</p> <p>Also provide, where applicable, other commitments the proponent can make to respond to the issue, such as:</p> <ul style="list-style-type: none"> • offsetting or mitigation to compensate for uncertainty in baseline; • follow-up to verify the accuracy of predictions and effectiveness of mitigation; • applicable guides, standards and thresholds the proponent intends to meet; and • measures the proponent intends to take to comply with other legislative frameworks that provide a means to address effects.
TC-01	7.13.3		<p>“The Chukuni River is considered to be navigable based on the assessment TC.” is incomplete.</p>	<p>Correction: “The Chukuni River is considered to be navigable based on the assessment completed by TC.”</p>
TC-02	7.13.7.3		<p>Refers to Unnamed Waterbody 5. Based on the project footprint, Waterbody 5 does not appear to be impacted or dewatered. It is assumed proponent intended to reference <u>Waterbody 4</u>.</p>	<p>Proponent to review and confirm or correct waterbody reference.</p>

⁴ Outstanding information requirements must be limited to information or clarifications that are necessary to formulate or substantially strengthen a conclusion related to decision-making, such as the extent to which federal effects are significant, the identification of appropriate mitigation and follow-up measures, and whether the federal effects are justified in the public interest. “Federal effects” means effects within federal jurisdiction and adverse direct or incidental effects (as defined in section 2 of the IAA). Public interest considerations are outlined in section 63 of the IAA. Comments can also be provided in relation to IAAC’s obligations under section 79 of the *Species at Risk Act*.