



Canadian Northern Economic
Development Agency
5019 52nd Street
Yellowknife, NT X1A 2R3

Agence canadienne de
développement économique du Nord

September 17, 2021

Ms. JoAnne Deneron
Chairperson
Mackenzie Valley Environmental Impact Review Board
200 Scotia Centre
Box 938, 5102-50th Ave
Yellowknife, NT X1A 2N7

Via the Online Review System

Pine Point Mine Project EA2021-01: Government of Canada's Comments on the Draft Terms of Reference

Dear Ms. Deneron,

Thank you for your request for comments on the draft Terms of Reference for the proposed Pine Point Mine Project. The Government of Canada has reviewed the draft Terms of Reference and the Northern Projects Management Office (NPMO) is submitting recommendations on behalf of Crown-Indigenous Relations and Northern Affairs Canada, Environment and Climate Change Canada, Health Canada, Natural Resources Canada and Transport Canada. Fisheries and Oceans Canada and Parks Canada have reviewed the draft Terms of Reference but do not have any comments.

As requested, these recommendations have been submitted as an excel document through the Mackenzie Valley Environmental Impact Review Board's Online Review System (ORS). Since the ORS does not accept hyperlinks, please also Annex A: Reference Material by Comment Number at the end of this letter.

The Government of Canada looks forward to continued participation in the Board's process. If you have any questions or comments, please contact Katie Bakker, Project Manager, NPMO, at Kaitlyn.bakker2@canada.ca or (867) 765-8057.

Sincerely,

Lisa Dyer
Director General
Northern Projects Management Office

Canada

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c. Mark Hopkins, Director General, Crown-Indigenous Relations and Northern Affairs Canada

Matthew Spence, Regional Director General, Crown-Indigenous Relations and Northern Affairs Canada

Mary Taylor, Director General, Environmental Protection Operations Directorate, Environment and Climate Change Canada

Tom Hoggarth, Director General, Fisheries and Oceans Canada

Jonah Mitchell, Field Unit Superintendent, Southwest NWT Field Unit

Anita Gudmundson, Regional Manager, Environmental Programs, Transport Canada

Brenda Woo, Regional Manager, Environmental Health Protection, Health Canada

Rinaldo Jeanty, Director General, Explosive Safety and Security Branch, Lands and Minerals Sector, Natural Resources Canada

The logo for the Government of Canada, featuring the word "Canada" in a serif font with a small Canadian flag icon above the letter "a".

GCDOCS # 97677832



Annex A: Reference Material by Comment Number

Comment	Topic/ Department	Reference
4.	Air Quality Health Canada	Health Canada. 2016. Guidance for Evaluating Human Health Impacts in Environmental Assessment: Air Quality. Available at https://www.canada.ca/en/health-canada/services/publications/healthy-living/guidance-evaluating-human-health-impacts-air-quality.html
7.	Acoustics Health Canada	International Organization for Standardization (ISO). ISO/TS 15666:2003. Confirmed in 2013. Acoustics — Assessment of noise annoyance by means of social and socio-acoustic surveys. https://www.iso.org/standard/28630.html
13.	Guidance Documents Health Canada	HC suggests changing the following guidance document reference (Guidelines for Environmental Assessments on Human Health) in Appendix A. The reference in Appendix A of the ToR should read, "Health Canada's Participation in Environmental Assessment under CEAA 2012" and link to the following webpage: https://www.canada.ca/en/health-canada/corporate/publications/health-canada-participation-environmental-assessments.html .
17.	Guidance Documents Transport Canada	Transport Canada recommends that a new weblink be added to the list of guidance documents: Transport Canada Navigation Protection Program information and documents https://tc.canada.ca/en/marine/protecting-our-navigable-waters
37.	Emissions Environment and Climate Change Canada	Although the Strategic Assessment of Climate Change (SACC) does not specifically apply under the Mackenzie Valley Resource Management Act, the SACC and the Draft Technical Guidance published by ECCC to support the SACC are a useful references. ECCC is therefore recommending the inclusion of additional emission estimate requirements in the ToR that will aid in the assessment of the project's contribution to GHG emissions. The SACC can be found at https://www.canada.ca/en/services/environment/conservation/assessments/strategic-assessments/climate-change.html The Draft Technical Guidance can be found at https://www.canada.ca/en/environment-climate-change/corporate/transparency/consultations/draft-technical-guide-strategic-assessment-climate-change.html
38.	Carbon Sinks	Although the Strategic Assessment of Climate Change

	Environment and Climate Change Canada	<p>(SACC) does not specifically apply under the Mackenzie Valley Resource Management Act, the SACC and the Draft Technical Guidance published by ECCC to support the SACC are a useful references. ECCC is therefore recommending the inclusion of a quantitative description of the project's positive or negative impacts on carbon sinks in the ToR that will aid in the assessment of the project's impact on carbon sinks.</p> <p>The SACC can be found at https://www.canada.ca/en/services/environment/conservation/assessments/strategic-assessments/climate-change.html</p> <p>The Draft Technical Guidance can be found at https://www.canada.ca/en/environment-climate-change/corporate/transparency/consultations/draft-technical-guide-strategic-assessment-climate-change.html</p>
39.	Greenhouse Gas Emissions Environment and Climate Change Canada	<p>Although the Strategic Assessment of Climate Change (SACC) does not specifically apply under the Mackenzie Valley Resource Management Act, the SACC and the Draft Technical Guidance published by ECCC to support the SACC are a useful references. ECCC is therefore recommending the inclusion of additional requirements in the ToR that will aid in the assessment of the project's impact on Canadian and global emissions in this subsection.</p> <p>Furthermore, based on past project reviews, ECCC is of the opinion that comparison of a project's emissions to those of an entire province/territory and those of Canada is not beneficial.</p> <p>The SACC can be found at https://www.canada.ca/en/services/environment/conservation/assessments/strategic-assessments/climate-change.html</p> <p>The Draft Technical Guidance can be found at https://www.canada.ca/en/environment-climate-change/corporate/transparency/consultations/draft-technical-guide-strategic-assessment-climate-change.html</p>
40.	Greenhouse Gas Emissions Environment	<p>As such, ECCC recommends that the proponent develop a plan to reach net zero emissions. Although the Strategic Assessment of Climate Change (SACC) does not specifically apply under the Mackenzie Valley Resource</p>





	and Climate Change Canada	<p>Management Act, the SACC and the Draft Technical Guidance published by ECCC to support the SACC are a useful references. ECCC is therefore recommending the inclusion of additional requirements in the ToR that will aid in the assessment of the project's GHG effects and mitigation measures.</p> <p>The SACC can be found at https://www.canada.ca/en/services/environment/conservation/assessments/strategic-assessments/climate-change.html</p> <p>The Draft Technical Guidance can be found at https://www.canada.ca/en/environment-climate-change/corporate/transparency/consultations/draft-technical-guide-strategic-assessment-climate-change.html</p>
41.	Storage for Petroleum Liquids Environment and Climate Change Canada	<p>It is recommended that the developer review the information in the Government of Canada's discussion document, available at https://www.canada.ca/en/environment-climate-change/services/canadian-environmental-protection-act-registry/approach-volatile-organic-compounds-emissions-petroleum-liquids-discussion-document.html</p> <p>Comments or questions regarding the proposed regulations can be directed to ECCC's Oil, Gas and Alternative Energy Division at covsecteurpetrolier-vocpetroleumsector@ec.gc.ca</p>