

Table 3-2 Summary of Issues

Subject Matter	Response
<p>Accidents and Malfunctions</p> <p>Need for further information on potential accident and malfunction scenarios that could lead to environmental and human health effects, and the Proponent's capacity to mitigate and address potential effects.</p>	<p>Detailed accidents and malfunction scenarios are not included as part of the DPD process and potential effects from accidents and malfunctions are completed if an Impact Assessment (IA) is required. A list of potential accident and malfunction scenarios that we have identified is included in Section 9.3.4. Design and operation of equipment is completed to include safeguards to protect against such occurrences of accidents and malfunctions and further, contingency and emergency response procedures will be developed and implemented if an unplanned accident or malfunction event were to occur. Safeguards that are part of the equipment components will also be included in the natural gas-fueled power generation facility (PGF), CO₂ Pipeline, Natural Gas Pipeline and Transmission Lines, Section 9.1.</p> <p>The Project will commit to following the Canadian Environmental Protection Act for developing an emergency preparedness plan.</p>
<p>Acoustic Environment</p> <p>Recommend an assessment of potential Project effects including the location of sensitive receptors (e.g., hospitals, schools, retirement complexes, assisted care homes) and traditional land use when identifying potential Project related acoustic impacts on human health. Recommend establishing sensitive receptor locations in consultation with Indigenous nations.</p>	<p>MIL will undertake a Noise Impact Assessment for the Project pursuant to the provincial AUC rule 007, which includes identifying potential noise sensitive receptors in the study area, including residential dwellings, hospitals, etc., and consultation with local Indigenous communities, such that noise impact from the Project on those noise receptors can be assessed, and the Project noise compliance can be confirmed with the noise limits (i.e., Permissible Sound Levels) following the Alberta Utilities Commission (AUC) Rule 012: Noise Control. A baseline noise assessment was completed in July 2023, the results of which are included in section 19.3 of the DPD.</p>
<p>Clarify noise complaints and resolution procedures, noise attenuation plans, potential mitigation measures and follow-up and monitoring plans.</p>	<p>Once the Project's design has sufficiently progressed, with detailed Project equipment configuration and noise source data available, detailed noise impact assessment modeling will be done to evaluate the noise impact from the Project to the surrounding environment and sensitive receptors. If necessary, noise mitigation measures may be recommended, and noise attenuation plans can be developed. Potential mitigation measures are provided in Section 19.3.</p> <p>In accordance with the procedures of AUC Rule 012 Section 5, noise complaints, if any, can be filed and investigated, and resolved in a timely manner. If noise monitoring is necessary to address a complaint, a Noise Complaint Investigation Form of AUC Rule 012 will be completed and followed.</p> <p>MIL intends to develop a policy to address any third-party comments, concerns, and inquiries throughout construction and operations of the PGF.</p>
<p>Alternative Means of Carrying out the Project</p> <p>Clarify the availability of alternate carbon storage hubs for storage of carbon dioxide captured during Project operations.</p>	<p>A cornerstone of Alberta's hub model is that each hub project must provide open access to potentially allow CO₂ emissions from multiple industrial sources to be stored in a single sequestration area. Accordingly, the Athabasca Banks Carbon Hub Project will be developed independently and potentially sequester CO₂ from other industrial sources in the region. If the Athabasca Banks Carbon Hub is determined to not be viable, or does not proceed for any reason, MIL can consider other potential hubs to sequester its CO₂. At present, there are several other hubs under development within 100 km of the Project for consideration. Availability of alternative CO₂ sequestration hubs that could be used for storage of the CO₂ have been identified in Figure 12.1 in Section 12 of the DPD.</p>
<p>Alternatives to the Project</p> <p>Concern that renewable power generation (wind and solar) would be a preferable, reliable alternative to the Project and would be better suited to meet Canada's goals for net-zero greenhouse gas emissions by 2050.</p>	<p>As described in Section 7.1, the purpose of the Project is to supply reliable, affordable, and dispatchable (on-demand) low-emitting generation (LEG) to Albertans.</p> <p>Based on MIL's estimates, we believe the cost of power from the proposed combined-cycle with integrated carbon capture that generates baseload, near-zero emission power compliant with Canada's recently proposed Clean Electricity Regulations would be competitive with the cost of wind generation (stand-alone). This is even before considering the additional, significant cost of firming-up the wind generation (or other non-emitting but intermittent generation resources, such as solar) with battery energy storage or other technologies to meet the high base load factor energy demand from Alberta's industrial, commercial and residential users, which will only increase with further electrification of the economy.</p>
<p>Atmospheric Environment</p> <p>Concerns regarding the effects of the Project on air quality, including vehicular traffic, construction and operation, and decommissioning. Recommend using equipment with engines that meet Tier 4 emission standards to assist in mitigating the air quality impacts of the Project.</p>	<p>Where possible, the Project will consider retaining contractors with Tier 4 compliant vehicles or requesting that contractors use Tier 4 vehicles if available. As design and contracting processes develop, consideration for the use of equipment that meets higher guidelines will be explored. Off-site parking and shuttle for construction personnel will also be considered to reduce the potential source points of air emissions. An idling policy will also be considered for the Project.</p>
<p>Recommend including the location of sensitive receptors (e.g., hospitals, schools, retirement complexes, assisted care homes) and traditional land use when identifying potential Project-related air quality impacts on human health and the potential health effects from short-term increases in contaminant concentrations in ambient air due to Project activities.</p>	<p>A receptor map/figure is provided in Section 19.3 to identify sensitive noise receptors near the Project (e.g., Eagle River Tourism RV Park). Additional information pertaining to air quality and impacts on human health, will be provided in Section 19.2.</p>



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<p>Atmospheric Environment (cont)</p> <p>Need for complete inventory of all potential air pollutants: nitrogen dioxide, sulphur dioxide, dust, particulate matter, carbon monoxide, ozone, volatile organic compounds, polycyclic aromatic compounds, metals and other substances that may be released (including diesel exhaust emissions), predicted residual effects on air quality from Project construction, operations, and maintenance, and an exclusion list of all air pollutants and the justifications for exclusion.</p> <p>Confirm greenhouse gas emission estimates; the emissions intensity values are different between Table 7.3 and Table 23.1.</p>	<p>Additional information pertaining to air pollutants has been added to the DPD including a high-level estimate of construction and decommissioning emissions (see Section 19.2). A detailed list of contaminants of potential concern (COPC) will be evaluated under an Impact Assessment (IA) be required. Additionally, an air quality assessment, including modelling of a range of COPCs, will be done to support the provincial Environmental Protection and Enhancement Act (EPEA) application. The suite of COPCs included in this assessment for the EPEA application will consider those air pollutants listed in Section 19.2, and justification will be provided for those Table 7.3 that are excluded.</p> <p>Revisions have been made to the GHG emissions estimates and intensity values to be consistent in the reporting in Table 7.3 and Table 23.1.</p>
<p>Climate Change and Greenhouse Gas Emissions</p> <p>Concern that the capture rate of 94.32% described in the Initial Project Description does not reflect current technological capabilities of Carbon Capture, Utilization, and Storage units. Need for additional data to understand the predicted emissions reduction anticipated for the Project.</p>	<p>Amine absorption of CO₂ from gas streams is a mature and commercially proven technology, having historically been used in the natural gas processing industry. The application of the amine-based CO₂ absorption process in natural gas combustion exhaust gas streams has been technically and commercially proven globally over several decades. Prospective licensors of the amine-based CO₂ absorption process for CO₂ removal from natural gas-fired combined cycle power generation exhaust gas, in conjunction with potential EPC contractors for the construction of power generation-CCS projects, are offering a guaranteed CO₂ removal rate of at least 95%, with associated liquidated damages provisions and financial assurances to backstop this process performance guarantee.</p> <p>Additional information regarding CO₂ emissions offsetting options have been included in Section 23. Updates to the share of emissions intended for storage and utilization have been included in Section 9.1.1.2 of the DPD. Calculations have also been revised in Section 7, Table 7.3 and Section 23, Table 23.1.</p>
<p>Need for additional information regarding the potential benefits of carbon offsetting and the share of emissions intended for storage and utilization.</p> <p>Clarify the Project's greenhouse gas emissions (including during construction and decommissioning phases) and contribution to climate change with consideration of the Strategic Assessment of Climate Change and the Government of Canada's long-term goal to achieve net-zero emissions by 2050. Provide a description of the planned mitigation measures, technologies, and best practices to be applied, including measures being considered to reduce the Project's greenhouse gas emissions on an ongoing basis.</p>	<p>Additional information has been included in Section 23 to clarify the Project's GHG emissions and contribution to climate change with consideration of the Strategic Assessment of Climate Change and the Government of Canada's long-term goal to achieve net-zero emissions by 2050.</p>
<p>Clarification on reduction of emissions due to new technologies (i.e. carbon capture) and clarification that new technologies will not trigger additional project effects.</p>	<p>The amine-based CO₂ capture process planned to be used in the Project is commercially proven and widely deployed having been historically used in the natural gas processing industry. This technology has also been demonstrated at a similar scale to MIL for electric power plants. Air Quality modelling and other environmental effects analysis will be completed as part of the provincial Environmental Protection and Enhancement Act application for the Alberta Environment and Protected Areas Department and will consider emissions and effects from the operation of the amine-based CO₂ capture process (ICCF) in that assessment.</p>
<p>Describe the Project's resilience to future climate change, and where relevant, how it is considered in Project design.</p>	<p>In the planning and design of the Project, consideration is being given to the following items to provide greater resilience to future climate change:</p> <ul style="list-style-type: none"> • Vulnerability to forest fires: ensuring the CCGT air intake and filtration system are designed to accommodate air particulate loading from forest fire smoke • Ensuring adequate groundwater supply capacity to the Project, taking into account the possibility of reduced groundwater availability due to long-term droughts • Ensuring that the PGF surface runoff pond capacity and runoff water discharge capacity are sized for appropriate extreme stormwater events, as storm severity may increase over time • Aerial cooler/condenser design to accommodate extreme summer high temperature conditions <p>The design of the CCGT equipment has been done in consideration of worldwide applications including in extreme temperatures (higher or lower). For example, the turbine planned for the Project is routinely operating where temperatures are considerably higher (e.g., Saudi Arabia, Qatar).</p>
<p>Cumulative Effects</p> <p>Concerns regarding the Project's contribution to cumulative effects given the density of industrial development within the Project area.</p>	<p>MIL has considered the cumulative effects associated with developing this Project on the current landscape and has implemented a number of measures to reduce impacts to the terrestrial, aquatic and cultural environment. This includes siting of the PGF on an existing aggregate quarry with considerable existing disturbance. The natural gas and CO₂ pipelines and transmission line are all proposed to be sited adjacent to existing rights-of-way, to limit disturbance to Crown lands where Treaty Rights could be practiced. Access to the ROW areas will be restricted during construction and decommissioning/reclamation activities for safe operation of equipment. Environmental and culturally sensitive features will be identified during the development phase of the Project in order that the Project infrastructure such as pipelines, transmission lines and access roads can avoid these areas.</p>



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<p>Cumulative Effects (con't)</p> <p>Concerns regarding the Project's contribution to cumulative effects to air quality, particularly as a result of Project -related increases in traffic volumes, in combination with other industrial activities in the area.</p>	<p>The air quality assessment indicated some NO₂ concentrations could exceed the federal CAQS; however, that is based on a very conservative scenario where the adjacent ANC facility operates at maximum approved emission rates, which it does not. Further description to outline the potential contribution from the Project on cumulative Air Quality will be completed when detailed equipment scopes for the Project have been developed for both construction and operations.</p> <p>Additional information pertaining to traffic volumes and Project access has been included in Section 9 (Project Activities and Physical Works). The Whitecourt vicinity may experience an increase in traffic volumes during construction of the Project. Increased traffic volumes are assumed to be short-term in duration, during the construction phase. Access road upgrades, to support the increase in traffic volumes, will be evaluated in coordination with Alberta Transportation and Economic Corridors (TEC) and local municipalities. A Traffic Impact Assessment will be completed as part of the Environmental Protection and Enhancement Act (EPEA) application or as part of the IA, should it be required. Traffic mitigation measures will also be implemented, if needed, and could include bussing, and adjusting shift hours to alleviate congestion.</p> <p>As described in Sections 13 and 21, there may be overlap between the linear Project components and the land used for traditional uses. The effects are anticipated to be limited to the construction activities and are expected to be temporary. The PGF is within an area that is currently zoned for resource extraction and has been cleared, and therefore the opportunity for traditional practices would be limited.</p> <p>The key themes emerging from engagement through both the IAAC consultation and MIL-led engagement are provided in Section 4.1. Concerns regarding the Project's contribution to cumulative effects on traditional land and resource use and the health and economic conditions of Indigenous peoples, are discussed in Section 21 and are based on the information available to date.</p>
<p>Economic and Social Conditions</p> <p>Concern that the long-term environmental impacts and financial costs of the Project outweigh the short-term benefits.</p>	<p>Project benefits are provided in Section 7.3. Benefits of the Project are considered long-term (i.e., greater than 30 years) and include providing affordable baseload, near-zero emissions electricity to Albertans, in compliance with the draft Canada Clean Electricity Regulations. Construction and operation of the Project will serve to diversify the economic base and increase regional spending, allowing businesses to establish or expand thereby fostering continued economic growth in the local area. The adverse effects from the Project are considered short-term and are focused primarily during the construction phase (disturbance to terrestrial landscape, dust and emissions from vehicle use, impacts of social services from construction workforce, etc.) but will be largely mitigated during operation, and into the decommissioning and closure phases (i.e., reclaim terrestrial landscape, reduced workforce needs during operation, etc.). Additional information is provided in the DPD in Section 7.3.</p> <p>Hiring strategies have not yet been developed for the Project to date. Further details are provided in Section 15.</p>
<p>Clarify the hiring strategy, including permanent employment anticipated, source and quantity of labour, how peak construction workforce will be staffed and how labour shortages and/or accessibility to trained labour were considered, as well as additional information on hiring local workers particularly from Indigenous nations.</p>	<p>Economic, social and ecological effects based on employment opportunities and effects on communities is beyond the DPD evaluation and would be included in an analysis if an IA has been deemed necessary by the Agency. Understanding the baseline information of the communities and local economic, social and ecological effects is important to develop employment plans and strategies as the Project moves forward. Applying MIL policies and commitments to hiring, training, and supporting local resources will be included as part of the development of the Project, as outlined in Section 15.</p>
<p>Clarify the economic, social and ecological effects as well as employment opportunity effects on communities.</p>	<p>Baseline information regarding the local economy and demographics have been included based on the information publicly available to date, see Section 15.1. Labour force information and MIL policies on hiring strategies are provided in Section 15.2.</p>
<p>Need for baseline information regarding the local economy, demographics and an assessment of whether the available local labour force will be sufficient to support construction and operation of the Project.</p>	<p>The Canadian government has proposed a number of incentives to encourage private sector companies to invest in clean electricity projects and CO₂ capture as Canada moves toward a decarbonized electricity grid by 2035. These include investment tax credits related to CO₂ capture value chain investment and clean electricity investment, potential development stage funding support, and potential contract structures intended to reduce risk related to future greenhouse gas emissions reduction regulation. MIL expects to explore some or all of these types of federal supports to the extent available and appropriate in pursuit of its overall business objectives. This information is included in Section 16.</p>
<p>Clarify on anticipated Federal financial support for the Project.</p>	<p>Potential effects of the Project were included in the IPD and have been updated in the DPD with any new information on Indigenous nation communities use of potentially affected land and resources for traditional purposes and associated impacts on the exercise of Aboriginal and/or Treaty Rights. The evaluation of potential effects is also being updated in the DPD in consideration of feedback from Indigenous nations through the ongoing engagement process. For detailed information, see Section 21 and 22.</p>
<p>Federal Lands</p> <p>Need for information about potential effects of the Project on reserve lands, as it relates to effects on current use of lands and resources for traditional purposes and impacts on the exercise of Aboriginal and/or Treaty Rights, and associated mitigation measures.</p>	<p>A figure showing the location of the Project components in relation to reserve lands in the proximity to the Project was provided in the Initial Project Description (IPD) (Figure 4.1). The distance and direction of the Indigenous nations relative to the PGF will be provided in Section 4.1.1.</p>
<p>Request a figure and description showing the location of all Project components in relation to reserve lands in the proximity to the Project.</p>	<p></p>

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Subject Matter	Response
<p>Fish and Fish Habitat</p> <p>Concerns regarding effects on fish and fish habitat through water quality and quantity on water bodies (i.e., Athabasca River) due to Project activities (i.e., herbicide usage).</p> <p>Concerns regarding Project effects on fish and fish habitat, including from changes in flows, waterbody or wetland crossings, groundwater draw down, cumulative effects and entrainment of fish in the outlet. Request information on fish habitat that will be disturbed and mitigation measures that will be implemented to address effects (i.e., offsetting measures).</p> <p>Clarity on how effects of noise created from Project activities will effect fish and fish habitat.</p> <p>Clarity on proposed watercourse crossing locations, mitigation measures and potential for residual effects, harmful alteration or fish habitat destruction as a result of water course crossings.</p>	<p>As described in Section 24.4, the storage and disposal of wastes during construction and operation will comply with water management regulations and best practices. The use of herbicides will be avoided, where possible. Trenchless crossing methods will be utilized (i.e., horizontal directional drill (HDD)) where the Natural Gas Pipeline or CO₂ Pipeline crosses water courses (e.g., Athabasca River). Fish and fish habitat assessments will be completed prior to construction to identify potential effects that may occur during construction and select appropriate mitigation measures that will be implemented to reduce potential effects.</p> <p>The Project is not expected to have direct adverse effects to fish and fish habitat in the Athabasca River or other water bodies, as there is no instream work planned. Additionally, groundwater supply will only be considered as a viable option if it can be demonstrated to provide a sustainable yield including confirmation that no adverse effects are anticipated to the aquatic environment. Evaluation of the groundwater availability and effects on the surrounding environment are included in Section 19.4.</p> <p>Noise emissions from Project activities that may have a potential effect on fish and fish habitat will be limited to the construction phase of the Project through use of construction equipment and vehicles. While the effects of noise may cause localized disruption to fish use where installation of pipelines crossing water courses by trenchless method (HDD) will occur, these effects will be localized, and of short-term duration. Additional information will be provided in Section 19.3.</p> <p>Watercourse crossings will be installed using a trenchless method (HDD) for both the Natural Gas Pipeline and CO₂ Pipeline. Identified crossings will be reviewed against the fish and fish habitat protection provisions of the Fisheries Act. A list of anticipated crossings will be provided in Section 19.7.</p>
<p>Follow-up and Monitoring Programs</p> <p>Clarity on reclamation protocols.</p> <p>Clarity on the types and amounts of chemicals being used during construction and operations of the Project and information on the standards being implemented for use, including accident and malfunction mitigations and monitoring.</p>	<p>Reclamation planning and requirements will follow provincial guidelines/requirements under EPEA, as provided in the approval to construct and operate the PGF. For pipelines and the transmission line, an environmental evaluation plan, and conservation and reclamation plan will be prepared and submitted to provincial regulators for approval prior to construction. Reclamation of CO₂ Pipeline, Natural Gas Pipeline, and Transmission Line disturbance areas will be done immediately following construction activities and will follow best management practices.</p> <p>A list of typical chemicals used for construction of power plants, pipelines and transmission lines, along with a list of chemicals that may be used in the operation of the PGF have been included in Appendix F. Chemicals listed in both lists are routinely used during construction or operations of power plants and industrial facilities throughout Alberta and Canada. While an effects assessment for accidents and malfunctions from construction and operations of the Project are not included in the DPD, design and safeguards that will be implemented during construction / operations of facility equipment, pipelines, and the stormwater management facility (SWMF) have been included in the description of the Project Components in Section 9.1.</p>
<p>Human Health and Well-Being</p> <p>Need for identification and locations of existing and potential future human receptors, including sensitive receptors.</p> <p>Clarity if identity factors (e.g., age, gender, family status, occupation) result in some human health receptors being affected differently by Project-related changes.</p> <p>Need for additional information regarding potential effects, residual effects and mitigation measures of the Project on health, social, and economic conditions.</p>	<p>A receptor map has been provided to identify sensitive noise receptors in the vicinity of the Project (e.g., Eagle River Tourism RV Park) and a table of receptors for the Air Quality assessment has been included in the DPD.</p> <p>A Gender-based Analysis Plus level of evaluation is beyond the DPD evaluation and would be analyzed if an Impact Assessment is deemed necessary by the Agency. At this point in time, none of the Project-related changes are anticipated to result in certain human health receptors being affected differently than others.</p> <p>Information has been provided in Section 22 addressing the potential effects to the health, social or economic conditions of Indigenous peoples of Canada. This information is based on (i) known potential changes that may occur as a result of carrying out the Project; (ii) information that is available to the public; or (iii) derived from any engagement undertaken with Indigenous peoples of Canada. Further evaluation of potential effects on air quality and noise, which may then lead to potential effects on health are provided in Section 19. Social and economic benefits of the Project are included in Section 7.3.</p> <p>Should the Project require an impact assessment under the Impact Assessment Act, an assessment of Project effects to human health will be considered based on Health Canada's Guidance for Evaluating Human Health Impacts in Environmental Assessment.</p>
<p>Indigenous and Stakeholder Consultation and Engagement</p> <p>Need for meaningful consultation with Indigenous nations throughout the life of the Project, including with respect to Project design, pre-disturbance assessments, environmental monitoring, and adaptive management.</p>	<p>MIL recognizes that each Indigenous nation may have a different perception, expectation and/or definition of what is meaningful consultation. MIL is committed to an ongoing two-way dialogue that provides opportunities for Indigenous nations to easily, respectfully, comfortably and safely ask questions and learn about the Project. At the same time, MIL wants to learn about the Indigenous nation and understand the potential effects of the Project on the Indigenous and Treaty Rights of the Indigenous nations. Through meetings and engagement to date, MIL understands that some Indigenous nations require capacity funding to participate and traditional land use studies to better understand the potential effects of the Project on their Treaty and Indigenous Rights. MIL is working to acknowledge this at the same time as moving the Project forward in an economically efficient manner. Please refer to Section 4, which outlines the engagement that MIL has conducted to date.</p>



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<p>Indigenous and Stakeholder Consultation and Engagement (con't)</p> <p>Clarify how the Project will advance reconciliation with Indigenous nations.</p>	<p>MIL's understanding of advancing reconciliation comes from the 94 calls to action published by the National Centre for Truth and Reconciliation. Focusing on Call to Action 92, MIL is committed to an engagement process that incorporates input from Indigenous nations to facilitate information sharing, two-way dialogue in order to understand perceived Project impacts, incorporate mitigation measures, consider Indigenous knowledge, and advance reconciliation where possible and as understood. See Section 4 for further information regarding the ongoing engagement with Indigenous nations.</p>
<p>Need for continued engagement with potentially affected Indigenous nations regarding access to traditional lands, and how current land use will be affected by Project activities.</p>	<p>MIL is committed to ongoing engagement with potentially affected Indigenous nations with respect to all aspects of the Project including access to traditional lands. The Project location is planned to be built on provincial Crown land. As a result, MIL is obligated to follow access and disposition rules associated with provincial Crown land. During construction, temporary restrictions to access in areas of active construction for safety considerations will be used. Rights-of-way areas for the Natural Gas Pipeline, CO₂ Pipeline, and the Transmission Lines will not be access-restricted outside of the construction and reclamation phases of the Project. The Power Generation Facility will be built on what is currently an aggregate quarry. For safety reasons, the PGF will not be accessible to the general public or Indigenous nations during the construction or operation phases of the Project without prior authorization from MIL.</p>
<p>Need for funding and capacity support for Indigenous nations to support consultation and engagement activities.</p>	<p>Through meetings and engagement to date, MIL understands that some Indigenous nations require capacity funding to participate and funding for traditional land use studies to better understand the potential effects of the Project on their Treaty and Indigenous Rights. MIL is working to acknowledge these requests while at the same time moving the Project forward in an economically efficient manner.</p>
<p>Indigenous Peoples' Current Use of Lands and Resources for Traditional Purposes</p>	
<p>Clarify potential and perceived Project effects to current land use, including wildlife and vegetation, corresponding potential effects to traditional food sources and food security of Indigenous peoples, and how these effects will be addressed.</p>	<p>MIL is meeting with Indigenous nations to gain a better understanding of the potential and perceived Project effects to current land use. Some Indigenous nations have requested TLU studies to determine the potential effects of the Project on traditional land uses. MIL is interested in understanding where these studies would take place, what information can be shared from these studies, how long will these studies take, and what the cost of these studies would be. Information from these land use studies would help MIL mitigate potential Project effects either through avoidance, relocation, or other adjustments.</p>
<p>Need for additional information on the area of crown land that the Project will occupy.</p>	<p>The land proposed for the Project is provincial crown land, or under lease through dispositions to other operators through the Alberta Government. MIL is happy to share shape files to assist Indigenous nations in understanding the location of the Project and its components.</p>
<p>Concerns regarding potential Project-related changes to Indigenous nations, including cultural and traditional practices, food security, Indigenous health, cultural and spiritual practices, medicinal, ceremonial and other traditional purposes.</p>	<p>MIL is committed to meeting with Indigenous nations to understand how the Project may affect their Indigenous and Treaty Rights including cultural and traditional practices, food security, Indigenous health, cultural and spiritual practices, medicinal, ceremonial, and other traditional purposes. Further details on the potential effects on traditional lands are included in Section 21.</p>
<p>Need for additional information on impacts to traditional land use including impacts to teaching locations, hunting and gathering areas and impacts to the function of wetlands due to Project activities.</p>	<p>MIL is committed to meeting with Indigenous nations to answer questions about the Project, listen to concerns and work collaboratively on mitigation measures, which may include avoiding, or reducing potential impacts. To date, no specific locations have been identified where teaching, hunting and gathering areas occur within any of the Project component footprints. MIL will provide shape files and offer discussions with subject matter experts to help Indigenous nations understand the Project and the potential extent of change and/or disturbance to the land. As described in the response to question 38, during construction, temporary restrictions to access in areas of active construction may be limited for safety considerations. Areas for pipeline and transmission lines will not be restricted outside of the construction and reclamation phases of the Project. The PGF will be built on what is currently an aggregate quarry. For safety reasons, the PGF will not be accessible to the general public or Indigenous nations during construction or operation phases of the Project without prior authorization from MIL.</p>
<p>Indigenous Peoples' Health and Well-being</p>	
<p>Need for information on how the potential effects of the Project will impact Indigenous peoples health and well-being, including potential impacts to drinking water, country foods, and increased contaminants.</p>	<p>Baseline data regarding the health, social and economic conditions of Woodlands County and the Town of Whitecourt, including Indigenous peoples was included in Section 15. Further discussion on the potential effects on Indigenous Health, Social, and Economic Conditions are in Section 22.</p>
<p>Need for more information on waste and disposal procedures, specifically on the usage of chemicals and the generation of amine waste, and identification of adverse effects to Indigenous nations.</p>	<p>As described in Section 24, all waste will be managed according to acceptable waste handling procedures, policies, and guidelines. A list of typical chemicals used during construction and operations has been included in Appendix F. Volumes will be determined during feed studies and waste monitoring will be completed per applicable provincial regulations.</p>
<p>Clarify potential surface water and groundwater quality changes from the Project, including consideration on how Indigenous Peoples consume water, and the potential effects on human health.</p>	<p>As described in Section 19.4, the Project has the potential to change groundwater quantity and quality during the construction and operation phase, however, sustainable yield to groundwater withdrawal will be met and no direct/indirect effects on groundwater quality are anticipated. Evaluation of the groundwater availability and effects on the surrounding environment are also included in Section 19.4. As described in Section 19.7, there are no plans for instream works. Where pipelines cross the Athabasca River, or other smaller watercourses, it is assumed that they will be installed using a trenchless method (e.g., horizontal directional drill (HDD)). During construction, there will be limited surface water changes and no permanent impacts are anticipated.</p>

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<p>Indigenous Peoples' Rights</p> <p>Clarity on the assessment of impacts to Rights and its incorporation into Project effects assessment and potential mitigation measures.</p> <p>Need for meaningful engagement with Indigenous nations to facilitate a common understanding of Section 35 Rights.</p> <p>Need for additional information regarding the cumulative impacts of multiple projects in the region on the exercise of Aboriginal and/or Treaty Rights.</p>	<p>Sections 21 and 22 provide additional details on assessment of potential Project effects and mitigation measures applicable to the Rights of Indigenous nations.</p> <p>MIL recognizes that each Indigenous nation may have a different perception, expectation and/or definition of what is meaningful consultation. MIL is committed to an ongoing two-way dialogue that provide opportunities for Indigenous nations to easily, respectfully, comfortably and safely ask questions and learn about the Project. MIL wants to learn about the Indigenous nation and understand the potential effects of the Project on the Indigenous and Treaty Rights of each Indigenous nation.</p> <p>MIL believes through active listening and ongoing meetings it will find a way to work cooperatively with Indigenous nations. One of the most important aspects of this work will be to generate a common understanding of the Section 35 Rights of each Indigenous nation. Please refer to Section 4, which outlines the engagement that MIL has conducted to date.</p> <p>Cumulative impacts are looked at during the IA process and would also include cumulative impacts of multiple projects in the region on the exercise of Aboriginal and/or Treaty Rights. For the DPD, potential effects are focused on at the Project level, while also considering the potential cumulative impacts to assist in assessing and siting Project components.</p>
<p>Indigenous Peoples' Social and Economic Conditions</p> <p>Clarity on the intent to support diversity and inclusion through the Proponent's hiring and training strategies; need for a better understanding of the target percentage for hiring Indigenous people and if Indigenous people who live near the Project will receive priority employment and training opportunities.</p> <p>Need for additional information regarding baseline health, social, and economic conditions and associated potential Project effects on local Indigenous peoples.</p>	<p>As Project planning progresses, hiring and training strategies will be further defined and developed, and these strategies, described in Section 15.2, will provide opportunities for Indigenous and local contractors and individuals.</p> <p>Baseline data regarding the health, social and economic conditions of Woodlands County and the Town of Whitecourt was included in Section 15 of the IPD. Additional information pertaining to the health, social and economic context in the region will be included in the DPD based on information that is available to the public or derived from the engagement that has been undertaken to-date.</p>
<p>Indigenous Peoples' Spiritual, Physical, and Cultural Heritage</p> <p>Clarity on the potential effects to physical and cultural heritage, including sites of archaeological and paleontological significance to Indigenous peoples, due to the construction and operation of the Project and information on notification processes to Indigenous nations if artifacts are recovered.</p>	<p>Potential effects to historical resources managed under the Alberta Historical Resources Act (HRA) are mitigated through a commitment to complete the requirements issued by Alberta Arts, Culture and Status of Women (AACSW) through the regulatory process. Distribution of historical resource site information is controlled by AACSW. Detailed process information on how the information and potential effects to historical resources will be assessed can be found in Section 21.</p> <p>If when possible, Traditional Land Use (TLU) information will be included in the selection of Historical Resources Impact Assessment (HRIA) target areas, pursuant to the HRA requirements, as directed by AACSW. If TLU sites are identified during the HRIA field assessment, these will be communicated through a high-level summary of HRIA results that can be provided to Indigenous nations who have identified their interest in receiving such information.</p>
<p>Migratory Birds and their Habitat</p> <p>Potential for effects to migratory birds during all Project phases, and corresponding obligations stemming from the Migratory Birds Convention Act, 1994 and its regulations.</p> <p>Need for information on potential impacts, monitoring, avoidance, and mitigation measures of linear Project features on migratory birds.</p>	<p>Wildlife surveys were conducted in the spring and summer of 2023 to support assessment of the potential effects of the Project on wildlife and wildlife habitat, including migratory birds. The key findings and results from the 2023 wildlife surveys are provided in Sections 14, 16 and 19.8. Mitigation measures will be developed to reduce potential effects, as needed and could include following restricted activity periods, conducting bird nest sweeps immediately prior to earth works and vegetation clearing, and following setbacks to water bodies, including wetlands.</p> <p>Mitigation measures are listed in Table 19.25 to address potential effects on wildlife and wildlife habitat (including for species at risk and migratory birds). Key findings and results of the 2023 wildlife surveys have been provided in Section 19.8.</p>
<p>Navigation</p> <p>Clarity required on whether any Project component (including incidental activities) may impact a navigable waterway and if so, more information required on potential impacts to navigable waterway and any potential mitigation measures.</p>	<p>There will be no impacts to navigable waterways, as defined in the Canadian Navigable Waters Act, as a result of the Project. Refer to Section 19.7 for further details on potential effects on surface water and fish and fish habitat.</p>
<p>Species at Risk, Terrestrial Wildlife, and their Habitat</p> <p>Concerns regarding potential adverse Project effects on species at risk and wildlife as a result of construction activities and operation of Project components.</p> <p>Need for additional information regarding species at risk (including COSEWIC species) and critical habitat that may interact with the Project, potential effects to species at risk, and mitigation measures to be implemented.</p> <p>Need for information on baseline and pre-construction/pre-clearing surveys that will be conducted to identify any hibernaculum and maternal roosting sites.</p>	<p>Wildlife surveys were conducted in the spring and summer of 2023 to support assessment of the potential effects of the Project on wildlife and wildlife habitat, including species at risk. The key findings are provided in Section 19.8.</p> <p>The key findings and results from the 2023 wildlife surveys have been provided in Section 19.8. Mitigation measures to address potential effects on wildlife and wildlife habitat (including for species at risk and migratory birds) are listed in Table 19.24. As Project planning progresses, further mitigation measures, including site-specific mitigation measures will be developed.</p> <p>The key findings and results from the 2023 wildlife surveys have been provided in Section 19.8. Pre-construction wildlife sweeps will be completed prior to construction of the Project.</p>

Table 3-2 Summary of Issues

Subject Matter	Response
<p>Vulnerable Population Groups (Gender-Based Analysis Plus)</p> <p>Consider Gender-Based Analysis Plus throughout the Project lifecycle, engagement, consultation, mitigation, and to create baseline conditions. Include potential gender-based violence risks.</p> <p>Need for a detailed description of the Proponent's corporate diversity strategy and how it is relevant to Gender-Based Analysis Plus and employment and labour issues regarding the Project.</p> <p>Clarify how inclusion will be tracked and how gaps in representation will be addressed with respect to engagement.</p>	<p>A Gender-Based Analysis Plus (GBA Plus) is not assessed to this level of detail for the DPD. Gender-based analyses will be assessed as the Project progresses. A GBA Plus will be provided should an Impact Assessment be required. Information available from the Canadian Census has been used to update the information provided in Section 15.</p> <p>As a Project company that is currently wholly owned, by the General Electric Company, MIL observes GE's corporate diversity and inclusion commitment. As described in Section 15.2, MIL is committed to the development of a hiring and training strategy for the Project which outlines policies and training strategies that provides opportunities for Indigenous and local contractors and individuals. These policies will address a workplace code of ethics, environmental, health, and safety, respectful workplace/workplace violence, including gender-based considerations, and will include hiring and training measures, incorporating gender equality and diversity employment measures and practices.</p> <p>All groups who have identified that they would like to be involved in discussions with MIL have been included in the engagement process.</p> <p>Who participates from the FN groups during engagement meetings is not being tracked for inclusion or for demographics. It is up to the nations to decide who is best to represent them and their views / input as a whole in the meetings with the MIL team. MIL is open to meeting with all members who want to be engaged and how they want to be engaged – this has included Elders, Chiefs, Councilors, Consultation Managers, community members and the nations or Indigenous nation's consultant (if they have one). If additional groups have been identified through the IAAC process to be added, MIL has reached out to those groups to be included in the engagement process. MIL has committed to continue to engage with Indigenous nations who have indicated they would like to participate throughout all Project phases.</p>
<p>Water – Groundwater and Surface Water</p> <p>Need information on the possible Project-related changes to water availability, local weather, and water bodies in consideration of climate change.</p> <p>Potential effects to water quality and corresponding obligations stemming from the Fisheries Act and its regulations.</p> <p>Need for additional information regarding Project -related effects to groundwater and surface water quality and quantity as a result of Project activities and proposed mitigation measures.</p>	<p>As described in Section 19.4 and 19.7, Project-related changes to water availability, local water, and water bodies are not anticipated. Construction of the pipelines and transmission line will result in the temporary disturbance of wetlands; all water course crossings will be done by trenchless methods of construction (see Section 19.6).</p> <p>There are no anticipated direct effects to fish bearing watercourses as a result of the Project. Watercourse crossings will be installed using a trenchless method (HDD) for both the natural gas pipeline and CO₂ pipeline. Identified crossings will be reviewed against the fish and fish habitat protection provisions of the Fisheries Act.</p> <p>Additional details regarding groundwater and the potential effects from the Project are described in Section 19.4. As Project planning progresses, groundwater evaluations and locations for source water will be developed along with site-specific mitigation measures.</p> <p>As described in Section 19.7, there are no watercourses in proximity to the PGF site, the Athabasca River is approximately 800 m south of the site, with multiple third-party infrastructure and operations that exist or are occurring between the PGF site and the river. As a result of the mitigation measures described in Section 19.7, it is unlikely that construction of the Project will affect surface water quality/quantity and fish or fish habitat.</p>
<p>Wetlands</p> <p>Need for additional information regarding potential direct and indirect effects of the Project on wetland functions (e.g., biological, social, hydrological).</p> <p>Need for additional rationale to support the conclusion that the Project will not adversely affect wetlands, and information regarding proposed measures to mitigate effects to wetlands.</p>	<p>As described in Section 19.6.1, there will be no direct effects on wetlands for the construction of the PGF. Desktop wetland mapping has been completed and included in the DPD to assess potential temporary or permanent effects to wetlands during construction of the pipelines and transmission line (Section 19.6.1). Mitigation measures for working in and around wetlands have been provided in the DPD and will be updated prior to construction of the Natural Gas Pipeline, CO₂ Pipeline, and Transmission Line.</p> <p>Desktop wetland mapping has been included in the DPD to assess potential temporary or permanent effects to wetlands during construction of the Natural Gas Pipeline, CO₂ Pipeline, and Transmission Line (Section 19.6.1). Mitigation measures are listed in Table 19.22 to address potential effects on vegetation and wetlands.</p>
<p>Other</p> <p>Need for clarification regarding the length and orientation of the pipelines, transmission lines and associated Project infrastructure, timelines for construction, and approvals required.</p> <p>Clarity regarding the use of existing roads (i.e., Highway 43) and exits that will be used for the Project activities and if new road infrastructure will be required.</p>	<p>The length and orientation of the Natural Gas Pipeline, CO₂ Pipeline, and Transmission Line and associated Project infrastructure, timelines for construction, and approvals is described in Section 11 (Project Schedule), Section 13 (Geographic Information), and Section 18.2 (Provincial Regulatory Requirements).</p> <p>Existing roads will be utilized for construction and operations of the Project. Increased traffic volumes are assumed to be short-term in duration, during the construction phase. Access road upgrades, to support the increase in traffic volumes, will be evaluated in coordination with Alberta Transportation and Economic Corridors (TEC) and local municipalities and a Traffic Impact Assessment will be completed as part of the Environmental Protection and Enhancement Act (EPEA) or as part of the IA, should it be required. Mitigation measures to reduce traffic during construction will include use of coordinated bussing to and from the PGF site, and the Natural Gas Pipeline, CO₂ Pipeline, and Transmission Line. During operation of the PGF, traffic will be limited to onsite workforce and maintenance vehicles.</p>