

Impact Assessment  
Agency of CanadaAgence d'évaluation  
d'impact du CanadaOntario Region  
600-55 York Street  
Toronto ON M5J 1R7Région de l'Ontario  
600-55, rue York  
Toronto (Ontario) M5J 1R7

May 19, 2023

Sent by email

**Correspondence to Federal Review Team**

James Neary, Crown-Indigenous Relations and Northern Affairs Canada  
 Wesley Plant, Environment and Climate Change Canada  
 Sarah Strapps, Employment and Social Development Canada  
 Kim MacKinnon, Federal Economic Development Agency for Southern Ontario  
 Thomas Hoggarth, Fisheries and Oceans Canada  
 Chantal Roberge, Health Canada  
 Jennifer Mercer, Indigenous Services Canada, First Nations and Inuit Health Branch  
 Natalie Pennefather, Indigenous Services Canada, Ontario Region  
 Adam Schjott, Innovation, Science and Economic Development Canada  
 Valerie Minelga, Parks Canada Agency  
 Peter Unger, Natural Resources Canada  
 Vera Haslett, Transport Canada  
 Denise Garneau, Women and Gender Equality Canada

Dear Colleagues:

Subject: **Federal Authority Advice Record for the Marmora Clean Energy Hub Project – Initial Project Description**

**Please complete and return Enclosure 1 by June 14, 2023 and Enclosure 2 by May 26, 2023**

The Impact Assessment Agency of Canada (the Agency) accepted the Initial Project Description for the Marmora Clean Energy Hub Project (the Project) from Northland Power Inc. and Ontario Power Generation (jointly, the Proponent) as meeting the requirements of the *Information and Management of Time Limits Regulations* under the *Impact Assessment Act* (the IAA).

On May 19, 2023, the Initial Project Description was posted on the Canadian Impact Assessment Registry Internet site<sup>1</sup>, starting the 180-day planning phase of the impact assessment. The Agency announced the start of a 30-day comment period, inviting the public, Indigenous groups and other jurisdictions to provide comments on the proposed Project.

.../2

<sup>1</sup> Reference #84597 at <http://iaac-aeic.gc.ca/050/evaluations/document/147660?culture=en-CA>

**Context for federal authority advice**

In accordance with subsection 13(1) of the IAA, the Agency requests your department's or agency's<sup>2</sup> input to identify:

- your responsibilities and expertise related to the Project as well as operational guidance that would be applicable to the Project's context;
- key issues likely to be relevant to the public interest decision, if an assessment is required; and
- solutions for addressing the key issues, including:
  - instructions for how the Proponent can build confidence that the issues will be addressed, through commitments and clarifications in the Detailed Project Description and Response to Summary of Issues;
  - high-level advice about information and studies that might be required in the Tailored Impact Statement Guidelines.

Feedback will help the Agency prepare a Summary of Issues<sup>3</sup> for the Proponent and inform the Agency's decision as to whether the Project requires an impact assessment. If an impact assessment is required, this same feedback would help the Agency prepare draft planning documents.

When deciding whether a project requires an impact assessment, the Agency considers the factors outlined in section 16 of the IAA, including the potential for adverse effects, comments received, and any other factors the Agency considers relevant. The Agency asks that federal authorities align expert advice with the Agency's approach to consider risk-based prudence and proponent evidence, with strong reliance on well understood mitigation measures, existing guidance, and the oversight of regulatory instruments that will manage effects.

**The Project**

Northland Power Inc., in partnership with Ontario Power Generation, is proposing the construction and operation of a new pumped storage and hydroelectric generating facility located in the municipality of Marmora and Lake, Ontario. As proposed, the Marmora Clean Energy Hub Project would produce up to 500 megawatts, and would operate for 100 years. The open pit lake from the abandoned Marmoraton iron ore mine would be transformed into the lower reservoir of the facility. The project would include an upper reservoir, tunnels and a powerhouse, a water delivery system, and an underground transmission line. The project would also include a 30-megawatt ground-mount solar facility, which would operate for at least 25 years.

.../3

---

<sup>2</sup> All subsequent references to department mean department or agency.

<sup>3</sup> The Summary of Issues is a list of issues raised in the Planning Phase prepared by the Agency, as per section 14(1) of the *Impact Assessment Act*. This document provides the proponent with an understanding of issues and allows participants to see how their comments and concerns have been characterized.

**Request for comments and risk characterization**

Attached to this letter are two enclosures.

- **Enclosure 1** is the *Federal Authority Advice Record*. Your department is encouraged to provide as much detail as practicable in describing key issues and clarifications or additional information the proponent could provide. You are also asked to provide a concise synopsis of each issue for inclusion in the Summary of Issues. Please note there are additional questions in this enclosure seeking information about local context for those federal authorities that may have insights. Submit Enclosure 1 via the *Submit a Comment* feature available on the Project's Registry page<sup>4</sup> **no later than June 14, 2023**.
- **Enclosure 2** requests information on your department's interest in participating in the Agency's Indigenous consultation and public engagement activities. As there may be protected information in this form, please submit the completed Enclosure 2 by email to *marmora@iaac-aeic.gc.ca* **no later than May 26, 2023**.

The information submitted to the Agency in the *Federal Authority Advice Record* will be made public on the Canadian Impact Assessment Registry Internet Site (Reference #84597). Please do not include any information that cannot be shared publicly. The Agency's Submission Policy<sup>5</sup> describes examples of private or confidential information that should not be included.

.../4

---

<sup>4</sup> Reference #84597 at <http://iaac-aeic.gc.ca/050/evaluations/proj/84597> Letters and forms can be uploaded using this feature. If you have any difficulties submitting this way, please contact the Agency using the information provided below for assistance.

<sup>5</sup> <https://iaac-aeic.gc.ca/050/evaluations/participation/conditions>

- 4 -

After the Proponent receives the Summary of Issues, they are required to submit a Detailed Project Description that includes an explanation of how they intend to address the issues raised. The Agency may contact your department for information or advice to determine if the proponent's response to the Summary of Issues is complete. Following acceptance of the Detailed Project Description, the Agency will decide<sup>6</sup> whether an impact assessment of the Project is required.

If you have any questions, do not hesitate to contact Natalie Boyd, Project Manager, by phone at 647-616-2471 or email [marmora@iaac-aeic.gc.ca](mailto:marmora@iaac-aeic.gc.ca). If desired, the Agency is also available to meet and discuss.

Sincerely,

<original signed by>

Anjala Puvananathan  
Director, Ontario Region

**Enclosures (2):**

1. Federal Authority Advice Record Form
2. Federal Authority Participation in Indigenous Consultation and Public Engagement Activities

c.c.: Amandeep Chohan, Employment and Social Development Canada  
Sheryl Lusk, Environment and Climate Change Canada  
Sabrah Talib, Federal Economic Development Agency  
Adam Rego, Fisheries and Oceans Canada  
Julie Boudreau, Health Canada  
Umme Akhtar, Health Canada  
Generic Account, Indigenous Services Canada  
Christina Clarke, Natural Resources Canada  
Jeremy Craigs, Transport Canada  
David Zeit, Transport Canada  
Jessica Bialek, Women and Gender Equality Canada  
Megan Kirby, Women and Gender Equality Canada

---

<sup>6</sup> In making its decision, the Agency must take into account the factors set out in subsection 16(2) of the *Impact Assessment Act*.