

Federal Authority Advice Record (FAAR)**FAAR Response must be submitted by July 3, 2026**

15-Mile Processing Hub Project – 15-Mile Minerals and Renewables.

Registry File: 90533

Department/Agency	Health Canada and Public Health Agency of Canada
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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?

Neither HC nor PHAC will 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 mandate¹ 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 material² 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.

Lauchie MacLean
Regional IA Specialist
Safe Environments Directorate

Name and title of Departmental /
Agency Responder

July 2, 2026

Date

¹ Refer to the [Memoranda of Understanding with IAAC](#).

² 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
HC-01	There is potential for exposure of the Mi'kmaq of Nova Scotia during traditional land use activities to contaminants of potential concern (COPCs), including arsenic, silver, mercury, lead, antimony, and tungsten. There is also potential for exposure to noise during traditional land use activities.	The key issue is linked to multiple Project components and activities for all three mine sites across the construction, operation, closure, and post-closure phases, particularly mine development (including access road construction and pit excavation), ore extraction and processing, mine waste and tailings management, material storage and handling, and supporting transportation activities at and between the three mine sites, all of which may generate emissions and discharges of contaminants to environmental media. The Project is relatively complex due to the redevelopment and coordinated operation of three historic mine sites (15-Mile Mine, Old Austen Mine, and Old Mitchell Mine) within separate Project Development Areas (PDAs). The Project includes ore extraction and transport between sites for centralized processing at the 15-Mile Mine, as well as the excavation, relocation, and management of legacy waste rock and historic tailings present across the mine areas. The potential for contaminant releases from multiple mine sites, transportation corridors, and disturbed historical mine materials introduces complexity and uncertainty in predicting environmental concentrations, exposure pathways, and potential health effects.	Emissions from various Project components could result in several Mi'kmaq of Nova Scotia First Nation communities being exposed to multiple COPCs through contact with environmental media (i.e., traditional foods, air, water, soil, sediment) during traditional land use activities. The Initial Project Description (IPD) identifies four Mi'kmaq First Nation communities with reserve lands near the Project PDAs: Millbrook First Nation, Pictou Landing First Nation, Sipekne'katik First Nation, and Paq'tnkek Mi'kmaw Nation. Available Mi'kmaq Ecological Knowledge Study (MEKS) information for the 15-Mile Mine and Old Austen PDAs indicate current Mi'kmaq use of the Project areas and surrounding lands for hunting, fishing, gathering, and other land-based activities. Reported uses include trout and salmon fishing, harvesting of goldthread, mushrooms, berries, and medicinal plants, and hunting of species such as deer, bear, rabbit, and grouse. The IPD doesn't identify permanent or seasonal residences located within the MEKS study areas (five kilometer radius from the mine PDAs). The IPD states that a 2019 MEKS report found no current Mi'kmaq use within or around the Old Mitchell Mine PDA but also notes that an updated MEKS for the Old Mitchell Mine area is underway and expected in 2026.	Under the <i>Impact Assessment Act</i> (IAA), Health Canada (HC) provides expert information and knowledge to support the assessment of impacts on Indigenous health from Project activities. Potential exposure of Indigenous peoples to COPCs is a frequent issue for mining projects and is relevant to this Project given the presence of historical mine materials, the likelihood of acid rock drainage (ARD) and metal leaching, and the Mi'kmaq of Nova Scotia use of the area for traditional activities. The Initial Project Description (IPD) indicates that the PDAs for 15-Mile Mine and Old Austen Mine overlap with traditional land use activities of Mi'kmaq First Nations. Millbrook First Nation have the nearest Mi'kmaq communities to these mine areas; Beaver Lake 17 Reservation and Sheet Harbour 36 Reservation are each about 25 km from the 15-Mile Mine PDA, and approximately 5.5 km and 20 km, respectively, from the Old Austen Mine PDA. Previous Environmental Assessment (EA) processes for the individual mine projects also identified concerns from potentially affected Mi'kmaq	Under sections 2(e) and 2(f) of the <i>Impact Assessment Act</i>, adverse effects of the Project on the health of Indigenous peoples are within federal jurisdiction. This issue is material to federal decision-making because Mi'kmaq communities may use the Project area and nearby waters for traditional activities, creating potential exposure pathways through air, water, country foods, and land use. Concern is increased by the Project's multi-site design, transportation of materials between sites, and disturbance of historical mine materials. These activities increase the potential for the release of arsenic and other COPCs and add complexity and uncertainty to predictions of exposure and potential health effects on Indigenous peoples.	To understand the overall Project-related impacts on the health of Indigenous peoples, Health Canada supports the commitment in Section 5.3 of the IPD that "15-MMR has committed to undertaking a Human Health and Ecological Risk Assessment (HHERA) for each of the three mine sites associated with the Project." The results of these HHERAs can also inform necessary PDA-specific mitigation and monitoring measures. Health Canada notes that while site-specific HHRA components may be developed, the overall approach should also consider potential combined and cumulative exposures across all three mine sites, particularly where receptors may be exposed to multiple Project-related sources and pathways. Health Canada recommends the proponent consider all potential human exposure pathways, including information on contaminant sources, release mechanisms, transport mechanisms within and between the relevant environmental media (including but not limited to atmospheric deposition of air contaminants, such as fugitive dust and components of diesel	- To address the issue of contaminant exposure, Health Canada recommends that an HHRA be undertaken for each mine site. An HHRA can be used to identify relevant COPCs and exposure pathways and estimate the likelihood and severity of adverse health effects. - To support the proposed HHRA and other health-related assessments, Health Canada recommends that future documents include the distances of all receptors, including seasonal and permanent residences (in km), from any Project components. A map could also be used to show this information. - The IPD includes a commitment to collaborate closely with Indigenous Nations. In keeping with this commitment, the collection of appropriate data for the HHRA through Indigenous engagement is recommended, where appropriate, to inform the collection of HHRA data and development of exposure assumptions so that the HHRA reflect representative and reasonably conservative exposure scenarios for Indigenous community members. - Health Canada recommends that the most stringent human

			Examples of potential exposure pathways specific to this project include: • Inhalation of COPCs in air contaminated via engine combustion, ore processing, and/or dust during traditional land use activities. • Ingestion of COPCs in drinking and recreational water contaminated via mine waste discharge, dust deposition, and accidents and malfunctions. • Ingestion of COPCs in traditional foods (e.g., fish, terrestrial wildlife, and plant species) contaminated via uptake of COPCs from Project-impacted water, soil and/or sediment, with potential for exposure across the study area, including of sensitive subpopulations, through shared consumption of country foods. • Exposure to noise emitted by the Project (e.g. haul truck traffic, blasting, etc.).	communities regarding potential effects on hunting areas and cultural use. This is a key issue within Health Canada’s mandate because Mi’kmaq communities may use the area and nearby waters for traditional activities, creating multiple potential exposure pathways through air, water, country foods, and land use. The issue is potentially complex and of increased concern for this Project due to the disturbance of historical mine materials, the potential for ARD and release of arsenic and other COPCs from waste materials.		exhaust emissions, onto country foods), points of exposure (receptors), and exposure routes. Health Canada notes that Human Health Risk Assessments (HHRAs) were conducted during the previous EA processes for Beaver Dam and Fifteen Mile Stream projects, and that there were unresolved Information Requests (IRs) from Health Canada when these EAs were terminated in 2023. While the proponent has indicated that the current Project reflects a redesign and constitutes a new proposal, Health Canada recommends that any relevant unresolved IRs and associated feedback from previous review processes be considered, as applicable, in the development of the individual mine site HHRA components of the HHERAs, to ensure that prior information gaps are adequately addressed. Health Canada guidance can be found on IAAC’s website (specifically the “Technical Considerations and References for the Preparation of Impacts Statement” page under Human Health).	health-based guidelines be used. 5. Consider Health Canada’s comments and Information Requests for the previous Beaver Dam and Fifteen Mile Stream EA processes when completing the HHRA components of the HHERAs.
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