

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	Indigenous Services Canada
Lead Contact	Norah Kielland
Full Address	10 Rue Wellington, Gatineau, QC J8X 4B1
Email	Norah.kielland@sac-isc.gc.ca
Telephone	
Alternate Contact	SAC.EvaluationImpacts-ImpactsAssessment.ISC@sac-isc.gc.ca

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?

Indigenous Services Canada (ISC) will not be required to exercise a power or perform a duty or function related to the project as it is not located on reserve lands.

As relevant,

- a) Specify the power, duty or function, or financial assistance, and the likelihood that it will be required to construct the project, based on the Initial Project Description, as either Required, Potential, Likely, Unlikely or Not Required
 - b) Describe any associated Indigenous or public consultation, including timelines
 - c) Describe any associated information requirements (e.g., alternative means assessment, habitat offsetting), and specify those that may be coordinated with the impact assessment process, if an impact assessment is required
 - d) Identify any associated project-specific guidance or issues of which the proponent should be aware, or information the proponent should provide
 - e) Indicate whether your department or agency has identified any power that it will not be exercising or may not be able to exercise to allow the project to be carried out, in whole or in part.
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:
- a) Specify the key issue (e.g., specific species and location)
 - b) Specify the project component or activity linked to the key issue
 - c) Explain why it's a key issue based on:
 - i. biophysical effect pathway(s) from the specific project component or activity
 - ii. concern unique to the project or a priority within your mandate
 - iii. the issue being material² to decision making under the *Impact Assessment Act*
 - d) Identify how the issue could be resolved, including through means other than an impact assessment
 - e) Identify additional information the proponent could provide including to give confidence on how the issue can be addressed through other means.

Norah Kielland, Indigenous Services Canada

Name and title of Departmental /
Agency Responder

July 3, 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
<i>Identify comments by organization and comment number.</i> <i>e.g.: IAAC-01</i>	<i>Specify the key issue (e.g., specific species and location).</i>	<i>Identify the project component or activity linked to the key issue.</i> <i>Be specific about the nature, scale, novelty and complexity or the component or activity.</i>	<i>Identify the specific biophysical effect pathway between the project component or activity and the affected environmental or human receptor (including Indigenous Peoples).</i>	<i>Describe why it's a key issue within the mandate of your department or agency, including in terms of priorities of the federal government and in terms of anticipated likelihood, severity or uncertainty of effects.</i> <i>Identify if the key issue is common for projects of this nature or in this sector, or whether it's unique to this project due to its complexity, size or novelty; a sensitive or rare receiving environment; and/or proximity of sensitive environmental or human receptors (including Indigenous Peoples).</i>	<i>Describe why the key issue is material to decision-making as either:</i> <i>an adverse effect within federal jurisdiction, or a direct or incidental adverse effect, that may be significant based on available evidence including:</i> <i>federal experts' knowledge and experience with past project assessments;</i> <i>presence of sensitive species, habitats or human receptors (including Indigenous Peoples);</i> <i>novel or complex project activities, components or technologies;</i> <i>high uncertainties in effects or in the effectiveness of mitigation measures;</i> <i>unknown or unproven mitigation; or</i> <i>a factor for the justification in the public interest anticipated to be material to decision-making such as a likely positive effect contributing to sustainability, to Canada's environmental obligations or climate change commitments or in supporting governmental priorities, such as reconciliation with Indigenous Peoples.</i>	<i>Describe how the key issue could be resolved or addressed by:</i> <i>Any means, including powers, duties, functions, frameworks, policies or guidance that your department or agency has;</i> <i>Any means, including powers, duties, functions, frameworks, policies or guidance from another jurisdiction, including the province;</i> <i>Common, proven, well-understood or standard mitigation measures to mitigate the effect or effect pathway(s); or</i> <i>Commitments made by the proponent (e.g., in the Initial Project Description).</i>	<i>Describe information the proponent can provide, or commitments the proponent can make, in their Response to the Summary of Issues that would provide confidence that the issue can be resolved by existing means.</i> <i>Consider whether information, studies, analyses or collaborative work with other authorities would be required to address the issue beyond existing means.</i>
ISC-01	Non-negligible adverse effects on the social and health conditions of Indigenous peoples. Lack of health, social, and economic baseline conditions of Indigenous peoples.	All phases of the Project have the potential to affect the health, social, and economic conditions of Indigenous Peoples through changes in environmental quality (e.g., air, water, and country foods), access to services and infrastructure, economic opportunities, and	Refer to Column b	ISC is responsible for supporting the health, safety, and overall well-being of Indigenous Peoples and, as such, considers this a key issue within its mandate. ISC supports the position that any assessment of potential impacts on the health, social, and economic conditions of	Under Sections 2(e) and 2(f) of the Impact Assessment Act, non-negligible adverse effects on the health of Indigenous peoples related to the Project falls within federal jurisdiction. The determination of significance of the potential adverse effects is directly tied to the adequacy and completeness of baseline information on the health, social, and economic conditions of Indigenous peoples. In the IPD, ISC notes the following key gaps in baseline information: The absence of a Mi'kmaq-specific health baseline section;	To resolve the key issues identified, the proponent should incorporate community-driven, Indigenous-specific baseline data. ISC recommends leveraging resources from the First Nations Information Governance Centre, integrating findings from Indigenous-led baseline studies (including Millbrook First Nation's traditional food study) and undertaking or co-developing additional research that is reviewed and validated by Mi'kmaq communities to ensure meaningful, community-specific insights. ISC	In regard to Indigenous-specific data, ISC recommends : - leveraging resources provided by the First Nations Information Governance Centre, particularly its regional survey reports. These resources can support the development of robust, community-informed baseline information. Additional information is available here: https://fnigc.ca/what-we-do/research-and-information/our-surveys/

		potential disruptions to community wellbeing. 3.7 Socio-economic Setting		Indigenous Peoples <u>should</u>: • include comprehensive, Indigenous-specific baseline data that accurately characterizes existing health, social, and economic conditions in affected communities; and • be informed by Indigenous-led baseline studies, or by studies conducted by the proponent that are co-developed with, reviewed, and validated by Mi'kmaq communities and organizations.	• The lack of availability of census data for the majority of reserve communities. Although, Section 3.7.1 of the IPD outlines the socio-economic setting, it appears to rely primarily on demographic data derived from CIRNAC sources or Census data, <i>where available</i>. As a result, this approach does not accurately reflect the socio-economic realities of many Mi'kmaq communities, limiting its representativeness and applicability. • The absence of critical baseline information related to housing, employment, access to and capacity of health and social services and programs, community safety, cultural continuity, and mental wellbeing, food security, drinking water sources, and existing health and social concerns in potentially affected communities; • There is no clear commitment by the proponent in the IPD to undertake comprehensive, Indigenous-specific health and socio-economic baseline studies; and • There is no commitment from the Proponent to include the results of the traditional food quality study Millbrook First Nation is undertaking referenced in Appendix D - 15-Mile Processing Hub Project - Engagement Logbook.	further advises that the proponent include targeted Mi'kmaq health, social, cultural, and economic baselines in the Impact Statement (if required by IAAC) and in the provincial socio-economic and health effects analyses, clearly demonstrating methodology, scope, and Indigenous input, and providing disaggregated on-reserve data. All baseline work should be carried out collaboratively with affected First Nations in alignment with OCAP® principles, ensuring communities retain ownership of both data and methodologies. These community-specific baselines would strengthen the Impact Statement, support long-term monitoring, and provide First Nations with indicators that inform ongoing health planning, governance, and decision-making. See column E for a more in-depth explanation.	- integrating the results of any Indigenous-led health and socio-economic baseline studies, including any country/traditional foods baseline studies (example : the traditional food quality study Millbrook First Nation is undertaking) - conducting or co-developing studies that are reviewed and validated by Mi'kmaq communities and organizations. Given the relatively small population sizes of on-reserve communities, such studies are feasible and would provide meaningful, community-specific insights that cannot be derived from aggregated datasets, enabling a more accurate characterization of existing health, social, cultural, and economic conditions. ISC also recommends that the proponent includes in the Impact Statement (If IAAC determines that further assessment is required) and integrate into the socio-economic and health effects analyses required for the provincial EA: • Targeted Mi'kmaq health, social, cultural and economic baseline studies for on-reserve populations; • The scope, depth, and methodology of any additional baseline work proposed and demonstrate how input from Indigenous groups has been incorporated into baseline characterization; • Disaggregated baseline data on health, social, cultural, and economic conditions, specific to on-reserve First Nations. Baseline studies on Indigenous health, social, cultural, and economic conditions should be carried out collaboratively with affected First Nations, in a manner that respects OCAP® principles (Ownership, Control, Access, and Possession).
--	--	--	--	--	--	--	--

							First Nations should retain ownership of both the information and the methodologies, enabling communities to replicate, update, or build upon these studies over time. Such community-specific baselines would not only strengthen the Impact Statement, but would also support long-term monitoring and provide First Nations with indicators that can inform ongoing community health planning, governance, and decision-making.
ISC-02	Non-negligible adverse effects on the social and health conditions of Indigenous peoples. Incomplete characterization of pathways of effect related to pressure on health and social services and programs and changes to non-federally regulated environmental components.	All phases of the Project have the potential to affect the health, social, and economic conditions of Indigenous Peoples through changes to access to health and social services. 5.3 Potential Impacts to the Mi'kmaq – Health, Social and Economic Potential effects pathways	Additional pathways need to be adequately considered, such as: • Pressure on health and social services pathway: Project-related changes (e.g., environmental concerns, population influx, economic shifts, or changes in food systems) → increased demand for health and social services → strain on existing, often limited, community health and social service capacity → reduced access to care and support → potential exacerbation of existing health and social inequities	This pathway is commonly associated with mining projects; however, they are particularly significant in this context due to the sensitivity of the receiving environment and the proximity of Mi'kmaq communities. Pressures on health and social services in Mi'kmaq communities may be exacerbated due to the project-related changes.	Under sections 2(e) and 2(f) of the Impact Assessment Act, non-negligible adverse effects on the health of Indigenous peoples related to the Project fall within federal jurisdiction. The determination of the significance of potential adverse effects is directly tied to the adequacy of identification of pathways of effects. The absence of this pathway introduces uncertainty in the assessment of both the likelihood and severity of potential effects.	To resolve the key issues identified, ISC recommends that the proponent commit to integrating Indigenous Knowledge and Mi'kmaq community perspectives into the development of the pathways of effects; to considering health system-level pathways of effects; and to co-developing mitigation and monitoring measures with Indigenous communities. ISC further recommends that the proponent commit to conducting or co-developing a Health Impact Assessment with Indigenous communities. See column E for a more in-depth explanation.	ISC recommends that the proponent commits to: - Integrating Indigenous Knowledge and community perspectives, based on engagement outcomes with Mi'kmaq communities, to develop pathways of effects that reflect a broader definition of health and wellbeing, including culturally relevant exposure pathways and perception-based risks, and that are not limited to land use and access-related pathways. - considering health system-level pathways, including potential increased demand on health and social services and programs, and associated implications for access to care and community wellbeing; and - committing to co-develop mitigation and monitoring measures with Indigenous communities to address both real and perceived risks. In addition, ISC recommends that the proponent commits to conducting or co-developing a Health Impact Assessment (HIA) with Indigenous communities to ensure a comprehensive evaluation of potential effects on health and wellbeing.

Please insert additional rows as necessary.

