Federal Authority Advice Record (FAAR)
FAAR Response must be submitted by July 19, 2026
Brandon Dispatchable Capacity Project – Manitoba Hydro
Registry File: 90571

Department/Agency	Health 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?

   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.

   Health Canada (HC) will not 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 mandate[1] 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 material[2] 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.

[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.

Ashley James, Impact Assessment Specialist

Name and title of Departmental / Agency Responder

July 17, 2026

Date

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

Identify comments by organization and comment number.
 	
e.g.: IAAC-01
	Specify the key issue (e.g., specific species and location).	*Identify the project component or activity linked to the key issue.*
		
		Be specific about the nature, scale, novelty and complexity or the component or activity.
			Identify the specific biophysical effect pathway between the project component or activity and the affected environmental or human receptor (including Indigenous Peoples).	*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.*
				
				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).
					Describe why the key issue is material to decision-making as either:
					
					• *an adverse effect within federal jurisdiction, or a direct or incidental adverse effect, that may be significant based on available evidence including:*
					  ○ *federal experts' knowledge and experience with past project assessments;*
					  ○ *presence of sensitive species, habitats or human receptors (including Indigenous Peoples);*
					  ○ *novel or complex project activities, components or technologies;*
					  ○ *high uncertainties in effects or in the effectiveness of mitigation measures;*
					  ○ *unknown or unproven mitigation; or*
					• *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.*
						Describe how the key issue could be resolved or addressed by:
						• *Any means, including powers, duties, functions, frameworks, policies or guidance that your department or agency has;*
						• *Any means, including powers, duties, functions, frameworks, policies or guidance from another jurisdiction, including the province;*
						• *Common, proven, well-understood or standard mitigation measures to mitigate the effect or effect pathway(s); or*
						• *Commitments made by the proponent (e.g., in the Initial Project Description).*
							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.
							
							Consider whether information, studies, analyses or collaborative work with other authorities would be required to address the issue beyond existing means.

HC-01	Potential exposure of Indigenous peoples to Contaminants of Potential Concern (COPCs) as a result of Project activities.	Construction and operations of the upgraded Brandon Dispatchable Capacity Project may result in emission of air borne contaminants. Emission sources include construction activities (e.g., gasoline and diesel fuel engines which may emit nitrogen oxides, sulphur dioxide, carbon monoxide, volatile organic compounds and particulate	Potential inhalation exposure of Indigenous receptors to COPCs attributable to Project emissions and resulting changes in ambient air quality with elevated baseline concentrations, including cumulative exposure scenarios with other nearby industrial activities.	Under the *Impact Assessment Act* (IAA), Health Canada (HC) provides specialist or expert information and knowledge to support the assessment of impacts on the health of Indigenous peoples. Air emissions are expected from Project activities, which might lead to impacts on Indigenous health, an area of federal jurisdiction. Section 5.4.3 of the Initial Project Description (IPD) notes that initial assessments of air quality indicated that the project will result in minor increases to	As per IAA Sections 2(e) and 2(f), adverse effects on the health of Indigenous peoples related to the Project falls within federal jurisdiction. The Project is located on Treaty 1 and Treaty 2 lands that overlap with the original territories of the Anishinaabeg, Anishininewak, Ininewak, and Dakota Oyate. The proposed project is also on the National Homeland of the Red River Métis. The closest First Nation Reserve lands near the project site include Gambler First Nation Reserve land and Waywayseecappo Highway 10 Reserve land (5-6 km northwest of the Brandon Generation Station (GS), and 5-6 km west of the preferred pipeline route. The nearest known rural residential dwelling is located approximately 1.5 km north of the project site, with many other rural dwellings and farmsteads in the region, reflecting local	HC recommends: • Comparing air quality parameters against the most stringent human health-based air quality objectives or standards (e.g., Canadian Ambient Air Quality Standards [CAAQS] or the World Health Organization [WHO] global air quality guidelines[4] for fine particulate matter [$PM_{2.5}$] and nitrogen dioxide [NO_2]) when undertaking air quality assessments, following Health Canada's *Guidance for Evaluating Human Health Effects in Impact Assessment: Air Quality*. It is important during air quality assessments to consider health-protective guidelines, including for non-threshold contaminants (such	HC recommends comparing the air dispersion modelling results against human health-based guidelines; applying health-based benchmarks; considering cumulative air quality, and identifying monitoring/adaptive management commitments as needed. HC recommends implementing all economically and technologically feasible mitigation measures to limit emissions of non-

[4] World Health Organization. (2021). WHO global air quality guidelines: particulate matter (PM2.5 and PM10), ozone, nitrogen dioxide, sulphur dioxide and carbon monoxide. https://iris.who.int/handle/10665/345329.

		matter), exhaust stacks, and fugitive dust from land clearing and site preparation.		pollutant concentrations while remaining below the Manitoba Ambient Air Quality Criteria. However, these modelling results were not presented in the IPD, and comparisons to health-based guidelines were not included. The air quality assessment in the IPD provides baseline context for air quality in the region but does not include discussion of receptor-based acute or chronic exposure.	agricultural land-use. Existing urban residential development as part of the City of Brandon, which has a significant urban Indigenous population[3], is approximately 2 km to the west of the project site.	as $PM_{2.5}$) for which health effects can be observed at any level of exposure. Further, applicable air quality standards, such as the CAAQS, should not be considered as "pollute up-to" levels and the Proponent is encouraged to strive for continuous improvement.	threshold air contaminants.
HC-02	Potential exposure of Indigenous peoples to noise as a result of Project activities.	Noise sources from the proposed Project include the addition of three heavy frame simple cycle combustion turbines and additional components, as well as the transformers, switchyard, cooling towers, natural gas pressure reducer building, the natural gas conditioner, combustion turbine building, and on-site mobile equipment currently located on the Brandon GS site.	Potential noise exposure of Indigenous receptors attributable to Project activities and resulting changes in noise environment including cumulative exposure scenarios with other nearby industrial activities.	Health Canada reviews acoustical assessments to evaluate their scientific validity and identify potential human health risks associated with project-related changes in environmental noise. Project noise emissions may affect Indigenous health, an area of federal jurisdiction. Noise exposure has been associated with hearing loss, sleep disturbance, communication interference, noise complaints, and increased annoyance[5]. Health Canada's assessment considers modelled changes in daytime and nighttime sound levels across all project phases (construction, operation, and decommissioning), predicted noise levels at locations where people may be present, noise characteristics (e.g., impulsive or tonal), and community type (e.g., urban, suburban, or quiet rural).	The IPD indicates that adverse effects from project-related noise are expected to be negligible as the Project is located within an existing heavy industrial area characterized by elevated ambient noise from railway and highway activity. Construction noise would be temporary, localized to station, tower, and access route areas, and of limited duration. As a result, the IPD concludes that noise-related effects on nearby First Nations are not expected to be significant. According to the IPD, noise assessment modelling has been undertaken; however, the results were not included in the IPD for review. Given the proximity of human receptors described in HC-01 and that modelling results were not available for review, there remains potential for exposure of Indigenous peoples to Project-related noise.	Due to the proximity of human receptors, HC recommends: • Providing an assessment of Project noise compared to the baseline to validate the conclusion that noise changes caused by the Project will have negligible impacts on human receptors. • Develop a communication plan for human receptors located nearby regarding Project-related activities which may result in noise disturbances and develop a complaints resolution process to address potential noise complaints. • Reduce noise impacts as much as feasibly possible during nighttime hours where there is a greater expectation of quiet. • As the Project is near the City of Brandon, the noise assessment should also identify and describe any particular receptors that may have a heightened sensitivity to noise exposure (e.g., Indigenous peoples, daycare centres, schools, places of worship, hospitals, seniors' residences).	To assess the impacts of noise from the Project, the Project-related change in the sound environment and the related increase in %HA should be evaluated as per Health Canada's *Guidance for Evaluating Human Health Effects in Impact Assessment: Noise*. In general, this dose-response relationship may be a useful tool in characterizing and quantifying average community response to noise levels and changes in noise levels.

[3] Government of Canada. (2023). Population with an Indigenous identity by gender and age: Canada, provinces and territories, census metropolitan areas and census agglomerations.
[5] Health Canada (2023). *Guidance for Evaluating Human Health Effects in Impact Assessment: Noise*.