

Summary of Issues

Adding Capacity to Sainte-Marguerite-3 Generating Station Project

The summary of issues outlines the key issues that the Impact Assessment Agency of Canada (IAAC) deems relevant to the impact assessment process for the project (the Project). The proponent's response to the summary of issues will inform IAAC's decision on whether an impact assessment is required under section 16 of the *Impact Assessment Act*. If an impact assessment is required, the key issues outlined below and the proponent's response will be used to inform the scope of the impact assessment and to develop the Tailored Impact Statement Guidelines and plans for the impact assessment.

For this summary, IAAC has considered relevant input given by federal authorities, Indigenous groups and the public to date, including during the public consultation period on the summary of the initial project description submitted by the proponent. IAAC invites the proponent to consult the participants' original comments posted on the Canadian Impact Assessment Registry Internet site (Reference Number [89403](#)).

The proponent is required to explain how it intends to address the key issues identified below as part of the development of its project. A high-level explanation is sufficient. Where relevant, the proponent is encouraged to specify whether certain key issues will be addressed by another competent authority, for example, through legislation or regulations, or through commitments made by the proponent such as the implementation of best practices, policies or standards that the proponent has committed to meeting.

Key issues

Indigenous peoples

- Potential adverse effects of the Project, which is located in the Nitassinan of the Innu of Uashat mak Mani-utenam (UMM), including cumulative effects, notably in relation to land use for traditional purposes, physical and cultural heritage (specifically the Woodland Caribou, which is central to Innu identity and culture), land stewardship, and the exercise of their rights and interests.
- Potential impacts of the Project on the exercise of rights recognized and affirmed by section 35 of the *Constitution Act, 1982* of Indigenous peoples affected by the Project: in this instance the communities of UMM and Matimekush–Lac John.

Appendix – Additional Comments, Guidance and Recommendations

The following list provides additional comments, guidance and recommendations by IAAC for information purposes only. The proponent is encouraged to consult the Canadian Impact Assessment Internet site for the Project (Reference Number [89403](#)) to view the original comments.

Additional comments, guidance and recommendations

Fish and fish habitat

- Concerns were raised regarding the potential adverse effects of the Project on fish and fish habitat, including those caused by the construction, use and dismantling of temporary works or by the Project's incidental activities planned outside of the Sainte-Marguerite-3 generating station.
- Concerns were raised regarding the potential adverse effects of the Project on salmonid egg incubation in spawning areas that may be located downstream of the Sainte-Marguerite-3 generating station (between KPs 66 and 76), particularly the effects of changes in velocity, temperature and water levels in winter caused by increased turbine flow rates.
- Concerns were raised regarding the potential adverse effects of changes in the seasonal variation and range of water levels in the Sainte-Marguerite-3 and Sainte-Marguerite-2 reservoirs on the ecological functions of fish habitats, including spawning.

Migratory birds

- Concerns were raised regarding the potential adverse effects of the Project on migratory birds, including those caused by the construction, use and dismantling of temporary works or by the Project's incidental activities planned outside of the Sainte-Marguerite-3 generating station.

Indigenous peoples

- Concerns were raised regarding the alignment of project activities and the priorities or strategies identified by the Innu Nation of Uashat mak Mani-utenam (UMM) in relation to physical and cultural heritage and the current use of lands and resources for traditional purposes (e.g., the Nitassinan stewardship role played by the Innu of UMM, fishery codes, Nitassinan guardian program). Specifically:
 - the potential effects of these activities on physical and cultural heritage, particularly with respect to species of importance to First Nations, including caribou (which is central to Innu identity and culture); and
 - the potential effects of these activities on the use of land and resources for traditional purposes.
- Potential impacts of the Project on Indigenous peoples, including those caused by the construction, use and dismantling of temporary works or by the Project's incidental activities planned outside of the Sainte-Marguerite-3 generating station.

Indigenous engagement

- Concerns were raised regarding the integration of the Indigenous consultation and accommodation process into the overall public participation process implemented by the proponent. It is important to acknowledge the significance of the First Nations' connection to the land, and to welcome and respectfully consider their assertions of rights.

Permits and authorizations

- It is important to consult Environment and Climate Change Canada to ensure compliance with the *Migratory Birds Regulations, 2022*, the *Migratory Birds Convention Act, 1994* and the *Species at Risk Act*, particularly with respect to the necessary permits and authorizations. Please take into account the [Guidelines to avoid harm to migratory birds](#) to avoid harming, killing or disturbing migratory birds or disturbing, destroying or taking their nests or eggs.
- It is also important to consult Fisheries and Oceans Canada regarding the *Aquatic Invasive Species Regulations* and the *Fisheries Act*.