The priorities of the Contaminated Sites On-Reserve Program are:

- To reduce and eliminate, where possible, environmental, health and safety risks posed by contaminated sites;
- To ensure that First Nation lands are available for economic and community development and traditional use/cultural continuity.

The CSOR Program receives most of its funding from the Federal Contaminated Sites Action Plan (FCSAP) Program.

As a custodian under the FCSAP Program, ISC is required to contribute through a cost share component (20% assessment, 15% remediation).
While CSOR is administered out of ISC HQ, the Program is implemented by First Nations and Regional ISC staff.

Projects are delivered jointly with First Nations and Tribal Councils, providing economic opportunities and opportunities for increased capacity for environmental management on-reserve.

Project implementation can be funded in one of two ways:

- **Grants and Contributions funding (First Nation led), or;**
- Operations and Maintenance funding (First Nation supported)
What is a Contaminated Site?

- A site at which substances occur at concentrations:
  - above background levels and pose, or are likely to pose, an immediate or long-term hazard to human health or the environment, or;
  - exceeding levels specified in policies and regulations;

Sources of Contamination on Reserve
- 51% Fuel Storage Tanks
- 40% Landfills/Solid Waste
- 9% Other Sources/Commercial
I think we might have a contaminated site!

- Many sites were identified through Environmental Issues Inventory (mid-1990’s), though sites have been added over time based on:
  - Additional sites identified by First Nations; through First Nations Land Management Environmental Site Assessments; environmental spills/incidents.

  **ISC relies on First Nations to identify potential suspected contaminated sites.**

- Once identified, ISC staff will work directly with the First Nation to determine if a site has the potential to be a contaminated site.

- If the site is suspected to be contaminated, the site will be listed in the [Federal Contaminated Sites Inventory](https://www.canada.ca/en/environment-climate-change/services/indigenous-nations/indigenous-contaminated-sites/inventory.html) as **Suspected**.

- ISC follows a long standing, pre-determined **10 step process** to assess and if needed, remediate (clean up) a site.

[YouTube](https://www.youtube.com/watch?v=dQw4w9WgXcQ)
What is the planning process like?

- **Projects on the workplan are driven by First Nations.** ISC relies on First Nations to indicate what projects on-reserve are priorities.

- Projects are prioritized for assessment/remediation based on available funding, risks to human health and the environment, economic and community development plans, capacity, and other factors the First Nation determines.

- ISC follows an annual workplan/funding cycle that’s directed by an overarching 5-year plan. FCSAP oversees this.
  - Workplans are updated annually, allowing for priority projects to be included.

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### Phase I, II, III
- 2005-2020
- Previous Phases

### Phase IV
- 2020-2025
- Current Phase
- Two years remaining
- Annual Workplans

### Phase V
- 2025-2030
- We are planning now!
- 5 year plan due summer/autumn 2023

### Phase VI
- 2030-2035
- Final Phase of FCSAP
Prioritizing sites for remediation is primarily influenced by:
- Risks to human health and the environment;
- Availability of funding;
- Other factors First Nations determine.

Sites must be assessed and classified in order to be eligible for remediation funding.

Limited funding for assessment has had a major impact on which projects are identified for remediation.
Funding approval/distribution

- After receiving input from First Nations, ISC Regional staff submit annual/5-year workplans to ISC HQ for review/ approval.
- Workplans are then submitted to the FCSAP Secretariat for review and approval.
- Once approved, funds are then distributed to the regions to establish *Contribution Agreements (G&C’s)* with *First Nations* or contracts (O&M).
ISC Environment Team Services

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ISC Environment Team services

We can help you:

- Determine FCSAP eligibility and assess possible funding sources
- Determine what stage you are at and what needs to be done next
- Seek advice from expert ministries
- Establish your characterization or remediation terms of reference
- Establish remediation criteria
- Comment on the technical specifications (ex: replacement of a tank including the management of contaminated soils)
- Compare bids and choose a consultant and/or contractor
- Validate proposed sampling plans
- Comment on draft reports

Regardless of FCSAP eligibility and the source of funding for the work
Program operation

• No call for proposals
  • You can contact us anytime
• Annual report on registered sites
• Multi-year planning based on available budgets, priorities and expertise available in the community
  • 5 year cycle
  • Annual planning update
  • Contingency
• Annual fixed funding in contribution (April 1 to March 31)
• Maintain a database of known or suspected sites
Services offered by the FNQLSDI

ISC also funds the following services offered through the FNQLSDI:

• Organize trainings on contaminated sites in the communities
• Organize training, awareness and networking events
• Develop tools adapted to the First Nations context
• Support communities in their projects

Claudel Babineau-Boule
Site remediation coordinator

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Site remediation project manager

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We thank you for the opportunity to share with you today and look forward to hearing your feedback today.

For more information about the Contaminated Sites on Reserve Program, please reach out to your regional ISC representatives!
Annex A - Supplementary Materials
Back to the 10 Step Process

Step 1: Identify Suspect Site
Step 2: Historical Review (Phase I ESA)
Step 3: Initial Testing (Phase II ESA)
Step 4: Classify Site (Optional)
Step 5: Detailed Testing (Phase III ESA)
Step 6: Reclassify Site
Step 7: Develop Remediation/Risk Management Strategy
Step 8: Implement Remediation/Risk Management Strategy
Step 9: Confirmatory Sampling and Final Report
Step 10: Long-Term Monitoring

Assessment Phase

Remediation Phase

There are economic opportunities for First Nations to support and/or lead assessment and remediation projects! ISC can support you through the process!
Environmental Site Assessment Types

- **Phase I ESA:**
  - Research the current and historical use of the area to determine if there’s a possibility for contamination on site.
  - This can be done by conducting site visits and interviewing First Nation members and/or Elders, reviewing documents and looking at aerial photography.

- **Phase II ESA:**
  - If your Phase I ESA indicates the potential for contamination, there will be a need to collect samples from soil, surface water, groundwater to analyze for the presence of contaminants.

- **Phase III ESA:**
  - If your Phase II ESA determines that contamination is present, you will likely need to conduct additional sampling to determine the extent and volume of contamination on site.

- **Human Health Risk Assessment***
- **Ecological Risk Assessment***

Lack of funding is often a limiting factor in the number of assessment projects implemented each year.
What’s Next? Site Classification

- You’ve completed your Phase II/III Environmental Site Assessment
  - In most cases, you will be able to “classify” your site with the information using the National Classification System for Contaminated Sites (NCSCS).
  - Site classification can occur after the Phase II ESA and/or Phase III ESA

<table>
<thead>
<tr>
<th>Class 1</th>
<th>Class 2</th>
<th>Class 3</th>
<th>Class N</th>
<th>Class INS</th>
</tr>
</thead>
<tbody>
<tr>
<td>High Priority for Action</td>
<td>Med. Priority for Action</td>
<td>Low Priority for Action</td>
<td>Not a Priority for Action</td>
<td>Insufficient Information</td>
</tr>
<tr>
<td>NCSCS score ≥70</td>
<td>NCSCS score 50-69.9</td>
<td>NCSCS score 37-49.9</td>
<td>NCSCS score &lt;37</td>
<td></td>
</tr>
</tbody>
</table>

- Classifications are determined based on the level of risk the site presents to human health and the environment.

The NCSCS was created by the Canadian Council of Ministers of the Environment’s (CCME) and is part of FCSAP’s Decision Making Framework.
What does the remediation process look like?

- That depends – but it will start with the development of a Remediation (R) or Risk Management (RM) Strategy (Step 7)!

- Your R/RM strategy will be based on many important considerations, though *future intended land use* will be an important one.

- Your independent consultant will help you design your preferred R/RM strategy.

You can build funds into the project for community engagement activities and outreach!
What about the remediation/risk management?

- Next is Step 8 - Implement Remediation Risk Management Strategy:
  - This is where the physical work happens, creating additional employment opportunities, especially with local/Indigenous businesses and suppliers.
  - The length of the R/RM work will depend on the nature, source and severity of contamination, remoteness, availability of contractors/equipment, length of field season etc.
  - Depending on the project, when remediation is complete, you may move to close the site (Step 9), or into Long-Term Monitoring (Step 10).
    - This will be determined in your R/RM Strategy.

- Step 8: Implement Remediation/Risk Management Strategy
- Step 9: Confirmatory Sampling and Final Report
- Step 10: Long-Term Monitoring
Is my site eligible for funding?

<table>
<thead>
<tr>
<th>YES</th>
<th>NO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sites connected to community facilities</td>
<td>Sites in operation (waste/dump sites)</td>
</tr>
<tr>
<td>(schools, band council offices, municipal</td>
<td>Sites on Certificate of Possession lands</td>
</tr>
<tr>
<td>garage, etc.)</td>
<td>Operating businesses, private fuel</td>
</tr>
<tr>
<td>Former ISC Diesel Plants</td>
<td>facilities</td>
</tr>
<tr>
<td>Former dump sites (authorized or illegal)</td>
<td>Sites established after becoming</td>
</tr>
<tr>
<td>on Reserve</td>
<td>operational under First Nation Land</td>
</tr>
<tr>
<td>Abandoned/Orphan sites*</td>
<td>Management</td>
</tr>
</tbody>
</table>

Reach out to your Regional ISC representative for questions relating to site eligibility and eligible costs!
Eligible Costs – Assessment *and* Remediation

**Eligible**

- Consulting, engineering, and contractor services and disbursements
- Mobilization/demobilization of equipment and personnel
- Development of Indigenous and/or stakeholder engagement plans or strategies
- Indigenous engagement (e.g., community meetings, workshops, distribution of brochures, newspaper advertisements, social media posts)

**Eligible (Indirect – max 10% cost)**

- Archaeological studies and activities that are concurrent to assessment activities and that are required for the physical work to be carried out.
- The development and implementation of skills development and training programs for workers, Indigenous communities, or stakeholders.
Eligible Costs – Remediation/Risk Management

- Eligible
  - Re-creation of a lost species’ habitat due to R/RM activities (e.g., loss of fish habitat, wetlands).

- Eligible (Indirect – max 10% remediation/risk management cost)
  - In the case of a built asset (buildings, facilities, or public works such as roads and sewers), equipment, or a storage tank system present at the site;
    - costs associated with relocation (temporary or permanent), demolition, dismantling, or removal and disposal or recycling of these items, provided that these activities are essential to access and remediate/risk manage contamination beneath or adjacent to the items.
  - Storage tank system removal or relocation if necessary to remediate/risk manage contamination beneath or adjacent to the storage tank system;
  - Removal of debris not contributing to the contamination at the site only when required to access contamination as part of the R/RM strategy, but excluding the cost of disposal;
Ineligible Costs

- Storage tank removal if not necessary for assessment or to access contamination;
- Storage tank system upgrades to stop ongoing contamination while a comprehensive R/RM strategy is being developed.
- Storage tank replacement;
- Assessment and/or decontamination of “sick” buildings due to occupational health and safety concerns (e.g., removal of asbestos, mould, flaking lead or PCB based paint from inside of a building).
  - In order for “sick” buildings to be eligible for FCSAP assessment and/or remediation funding, the building must be suspected/confirmed as a source of contamination and contaminants must have entered into the environment.
- Ongoing administrative (O&M) site costs - e.g., hazardous, solid, or sewage waste management costs, costs associated with licensed or operating landfill sites.
- Costs associated with relocation or temporary accommodation of people who are at risk from contamination at a site or who must be displaced to allow assessment/remediation activities to be conducted.