

Marten Falls Community Access Road Project – Agency responses to comments received until December 19, 2019

| Commenter | Comment Summary | Response to Comment |
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| Accidents and Malfunctions | | |
| Aroland First Nation Marten Falls First Nation Webequie First Nation Environment and Climate Change Canada (ECCC) Fort Albany First Nation Health Canada (HC) Individual member of the public | Commented about potential for accidents, including spills of hazardous substances and the length of time before an accident is found. | The Agency notes that Section 23 of the Tailored Impact Statement Guidelines will require the proponent to assess the potential for malfunctions and accidental spills, including effects to water quality. In addition, Section 4.3 of the Tailored Impact Statement Guidelines will require the proponent to examine and describe feasible alternatives to the Project. |
| Acoustic Environment | | |
| Animbiigoo Zaagi'igan Anishinaabek First Nation Aroland First Nation Fort Albany First Nation Marten Falls First Nation Health Canada (HC) | Commented on the potential impact of noise and disturbance to animals and Indigenous people, including hunting. | <p>The Agency notes that Section 16 of the Tailored Impact Statement Guidelines require the proponent to assess the effects of noise on human health.</p> <p>The Agency notes that Section 15.3 of the Tailored Impact Statement Guidelines require the proponent to assess the effects of the Project on wildlife, including noise. The Agency notes that Section 19.1 of the Tailored Impact Statement Guidelines require the proponent to assess the effects of the Project on hunting.</p> |
| Alternative means of carrying out the Project | | |
| Attawapiskat First Nation | Commented that alternate routes for the proposed road have been mapped out prior to an assessment of the landscape features important to wildlife. The location description indicates that the routes were chosen to maximize high ground location. Areas of high ground are often important to wildlife as travel routes or den sites, and building roads through these areas may have particularly negative effects on wildlife populations. | <p>The Agency notes that Section 4.4 of the Tailored Impact Statement Guidelines requires the proponent to examine potential alternatives means to carry out the Project.</p> <p>The Agency notes that Sections 15.3 and 15.4 of the Tailored Impact Statement Guidelines require the proponent to assess project effects on the habitat of terrestrial wildlife and of Species at Risk.</p> |

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| | | The Agency notes that Section 5 of the Tailored Impact Statement Guidelines require that the proponent take into account results of engagement and Indigenous Knowledge in refining the alternative routes. |
| Wildlife Conservation Society of Canada Ontario Ministry of Natural Resources and Forestry (MNRF) | Commented on the lack of clarity on the criteria used to assess potential road routes, including consideration of fish and fish habitat, wildlife habitat, and Dedicated Protected Areas identified through the Community Based Land Use Plan. | In addition to sections noted in the row above, the Agency notes that Section 4.3 of the Tailored Impact Statement Guidelines require the proponent to examine and describe feasible alternatives to the Project. Section 15.1 of the Tailored Impact Statement Guidelines require the proponent to assess project effects on Fish and fish habitat, habitat of terrestrial wildlife and of Species at Risk. |
| Individual member of the public KWG Resources | Commented that the use of rail would be safer to transport nickel and chromite than the use of roads. | The Agency notes that Section 4.3 of the Tailored Impact Statement Guidelines require the proponent to examine and describe feasible alternatives to the Project. The Agency notes that Section 4.4 of the Tailored Impact Statement Guidelines require the proponent to examine and describe potential alternative means of carrying out the Project. |
| Alternatives to the Project | | |
| Wildlife Conservation Society of Canada | Commented on the lack of clarity on the criteria used to assess potential road routes, including consideration of fish and fish habitat, wildlife habitat, and Dedicated Protected Areas identified through the Community Based Land Use Plan. | The Agency notes that Section 4.3 of the Tailored Impact Statement Guidelines require the proponent to examine and describe feasible alternatives to the Project. The Agency notes that Section 4.4 of the Tailored Impact Statement Guidelines require the proponent to examine and describe potential alternative means of carrying out the Project. Sections 15.1, 15.3 and 15.4 of the Tailored Impact Statement Guidelines require the proponent to assess project effects on Fish and fish habitat, habitat of terrestrial wildlife and of Species at Risk. |
| Individual member of the public | Commented that the East-West Tie would be more cost-effective than the Project. | The Agency notes that Section 4.3 of the Tailored Impact Statement Guidelines require the proponent to examine and describe feasible alternatives to the Project. |

| Atmospheric environment | | |
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| Animbiigoo Zaagi'igan Anishinaabek First Nation Aroland First Nation Environment and Climate Change Canada (ECCC) Fort Albany First Nation Health Canada (HC) | Commented that there may be impacts to air quality as a result of use of diesel generators, construction equipment, an increase in road traffic, dust, and decreased natural cover. | The Agency notes that Section 14.1 of the Tailored Impact Statement Guidelines requires the proponent to examine potential effects to air quality, including from diesel generators and from dust generated by exposed soils that are cleared and stockpiled. |
| Health Canada (HC) | Commented that sulfur dioxide, nitrous oxides, carbon dioxide, particular matter and volatile organic compounds, as well as, polycyclic aromatic hydrocarbons should be assessed in the Tailored Impact Statement Guidelines. | The Agency notes that Section 14.1 of the Tailored Impact Statement Guidelines requires the proponent to examine potential effects to air quality. The proponent is required to provide a quantitative assessment of criteria air contaminants (total particulate matter, PM10, PM2.5, sulphur oxides, nitrogen oxides, volatile organic compounds, and carbon monoxide) and assess any air contaminants potentially associated with the Project such as dust resulting from construction activities and ongoing vehicle use during operations or maintenance of the gravel roadbed. |
| Birds, Migratory Birds and their habitat | | |
| Animbiigoo Zaagi'igan Anishinaabek First Nation Environment and Climate Change Canada (ECCC) Wildlife Conservation Society of Canada | Commented that the Project may have impacts to migratory birds and their habitat as a result of habitat loss and disruptions to breeding. | The Agency notes that Section 8.10 of the Tailored Impact Statement Guidelines require the proponent to study the baseline conditions for birds, migratory birds and their habitat and that Section 15.2 of the Tailored Impact Statement Guidelines require the proponent to assess the Project's adverse effects on birds, migratory birds and their habitat. |
| Climate Change and Greenhouse Gas Emissions | | |
| Environment and Climate Change Canada (ECCC) Fort Albany First Nation Wildlife Conservation Society of Canada Anishinaabek Nation | Commented that climate change and impacts to the ozone layer due to greenhouse gas emissions and changes to carbon sinks, including from impacts to wetlands and their removal need to be considered in the impact assessment. | <p>The Agency notes that Section 15.5 of the Tailored Impact Statement Guidelines require the proponent to assess effects on climate change, including the effects arising from increased greenhouse gases emissions and the removal and alteration of wetlands.</p> <p>Section 25 of the Tailored Impact Statement Guidelines require the proponent to provide a description of the Project's contributions to sustainability.</p> |

| Country Foods | | |
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| Aroland First Nation Attawapiskat First Nation Fort Albany First Nation Health Canada (HC) | Concerned about impacts on quality and quantity of country foods, such as, fish, wildlife (including caribou), and plants for medicinal and traditional practices. Concerned about increased access to traditional territory. | <p>The Agency notes that Sections 8 and 12.2 of the Tailored Impact Statement Guidelines require that the proponent study baseline conditions of the quality and quantity of country foods.</p> <p>Section 16 of the Tailored Impact Statement Guidelines require the proponent to assess potential contamination of country foods. Section 19.1 of the Tailored Impact Statement Guidelines require the proponent to assess potential adverse and positive effects to the current use of land and resources for traditional purposes, physical and cultural heritage, and environmental, health, social and economic conditions of Indigenous peoples.</p> |
| Cumulative Effects | | |
| Aroland First Nation Attawapiskat First Nation Eabametoong First Nation Webequie First Nation Marten Falls First Nation Environment and Climate Change Canada (ECCC) Fort Albany First Nation Health Canada (HC) Anishinabek Nation Noront Resources Ontario Ministry of Natural Resources and Forestry (MNRF) Nibinamik First Nation Natural Resources Canada (NRCan) | Commented that cumulative effects will need to be assessed to adequately understand the impacts of the Project. This includes potential increase in mining activities and more road development as a result of access to the Ring of Fire area. | The Agency notes that Section 22 of the Tailored Impact Statement Guidelines require the proponent to carry out a cumulative effects assessment. Past and reasonably foreseeable developments in the Ring of Fire area, such as additional roads and mining related activities, will need to be included in the assessment. |
| Marten Falls First Nation | Commented that the Project was being lumped in with future mineral development, suggesting that concerns are being raised around issues that are outside of the control of the project team. | The Agency notes that Section 22 of the Tailored Impact Statement Guidelines require the proponent to carry out a cumulative effects assessment. Past and reasonably foreseeable developments in the Ring of Fire area, such as additional roads and mining related activities, will need to be included in the assessment. |

| Decommissioning and Abandonment | | |
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| Fort Albany First Nation | Commented on the impacts from the lack of appropriate decommissioning activities, revegetation and reclamation. | <p>The Agency notes that Section 3.2.3 of the Tailored Impact Statement Guidelines require the proponent to clearly state under what circumstances decommissioning would occur, and demonstrate a commitment to following environmental and social best practice in all its activities.</p> <p>Section 13.1 of the Tailored Impact Statement Guidelines require the proponent to describe and assess in detail the potential adverse and positive effects in relation to each phase of the designated project.</p> |
| Drinking Water | | |
| Attawapiskat First Nation Webequie First Nation Fort Albany First Nation Health Canada (HC) | Expressed concern that the Project may negatively impact the availability of safe drinking water. | <p>The Agency notes that Section 14.2 of the Tailored Impact Statement Guidelines require the proponent to assess any changes to groundwater and surface water.</p> <p>Section 16 of the Tailored Impact Statement Guidelines require the proponent to assess the effects to human health, including contamination of drinking water.</p> <p>Section 25 of the Tailored Impact Statement Guidelines require the proponent to assess the Project's contribution to sustainability, including long-term effects.</p> |
| Economic Effects | | |
| Fort Albany First Nation Marten Falls First Nation Wildlife Conservation Society of Canada KWG Resources Noront Resources Women and Gender Equality Canada Employment and Social Development Canada (ESDC) Innovation, Science and Economic Development Canada represented by Federal Economic Development Initiative for Northern Ontario (FedNor) | Commented that the regional development potential in the Ring of Fire area as a result of the Project could open the area up to increased access to economic opportunities, such as mineral development, jobs, and tourism. Impacts to Indigenous groups need to be considered to understand the positive and negatives of these opportunities to Indigenous groups. | The Agency notes that Section 11 of the Tailored Impact Statement Guidelines require the proponent to study the economic baseline conditions and that section 18 requires the proponent to assess the positive and adverse effects on the economic conditions, including the labour market, housing and consumer prices, business environment, infrastructure, public finances and overall economic impact. |

| Environmental Effects | | |
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| Fort Albany First Nation Marten Falls First Nation | Concerned about acid rain, forest fires, and pests as a result of the Project. | The Agency notes that Section 14.2 of the Tailored Impact Statement Guidelines require the proponent to describe any changes in risk to forest fires that may result from the Project. |
| Fish and Fish Habitat | | |
| Animbiigoo Zaagi'igan Anishinaabek First Nation Aroland First Nation Attawapiskat First Nation Marten Falls First Nation Fisheries and Oceans Canada (DFO) Environment and Climate Change Canada (ECCC) Fort Albany First Nation Wildlife Conservation Society of Canada | Expressed concern about fish and fish habitat resulting from construction and operations, including impacts to water quality, stream morphology, change to spawning habitat, disruption or destruction of fish habitat or death of fish, and increased fishing activity. In particular, Kagami Falls has been noted as an important area for spawning of Sturgeon, Speckled Trout, and Pickerel (walleye). | The Agency notes that Section 8.9 of the Tailored Impact Statement Guidelines require the proponent to study the baseline conditions and that Section 15.1 requires the proponent to assess the positive and adverse effects to fish and fish habitat, including spawning grounds. |
| Follow-up and Monitoring | | |
| Aroland First Nation Fort Albany First Nation Women and Gender Equality Canada (WAGE) | Commented that the proponent will need to implement follow-up and monitoring program measures and verify mitigation measures selected to manage potential effects of the Project. | The Agency notes that Section 20 of the Tailored Impact Statement Guidelines require the proponent to describe mitigation measures. Section 26 of the Tailored Impact Statement Guidelines require the proponent to propose follow-up program measures to verify effectiveness of mitigation measures or assessment predictions where there is uncertainty. The assessment is expected to cover all phases of the Project |
| Food Security | | |
| Fort Albany First Nation | Expressed concern about food chain impacts. Need to assess if the Project will reduce the cost of food in Indigenous community. | The Agency notes that Section 11 of the Tailored Impact Statement Guidelines require the proponent to study the economic baseline conditions and that Section 18 requires the proponent to assess the positive and adverse effects on the economic conditions, including the housing and consumer prices. |

| Funding Programs | | |
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| <p>Animbiigoo Zaagi'igan Anishinaabek First Nation Fort Albany First Nation Nibinamik First Nation Marten Falls First Nation</p> | <p>Commented that funding is essential for First Nation communities to meaningfully participate in the impact assessment process.</p> | <p>Through the Participant Funding Program, the Agency provides limited financial assistance to potentially impacted Indigenous groups to help prepare for and participate in key stages of the impact assessment. Eligible expenses include review of correspondence, participation in meetings and associated travel and related work, review and comment on key documents, professional fees; reporting costs; travel expenses, and honoraria and ceremonial costs.</p> <p>Indigenous groups were provided with grant funding at two points during the planning phase of the impact assessment process to review, and provide comment on, key documents including the initial Project Description, the Tailored Impact Statement Guidelines, and the Indigenous Engagement and Partnership Plan.</p> <p>During the impact statement phase, potentially impacted Indigenous groups will be invited to apply for further funding to support participation in the remainder of the impact assessment process.</p> |
| <p>Fort Albany First Nation</p> | <p>Asked whether Marten Falls First Nation is receiving participant funding for the Project.</p> | <p>The community of Marten Falls First Nation is eligible to receive funds from the Agency to participate in the Agency's consultation process. These funds cannot be used by Marten Falls First Nation in their roles as the proponent to fund the Project.</p> |

| General – Assessment Type | | |
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| Aroland First Nation Eabametoong First Nation Neskantaga First Nation Fort Albany First Nation Long Lake #58 First Nation Webequie First Nation Environment and Climate Change Canada Wildlife Conservation Society of Canada Anishinabek Nation Nibinamik First Nation Individual member of the public Ontario Ministry of the Environment, Conservation and Parks (MECP) | <p>Commented on the need for a federal assessment due to the regional context, the potential for social, economic and environmental effects, cumulative effects, and that the Project is listed in the <i>Physical Activities Regulations</i>.</p> <p>Commented that the proponent signed a voluntary agreement to complete an individual provincial EA and is encouraged to ensure both the provincial and federal assessment requirements are met.</p> | <p>The Agency has announced that a federal impact assessment is required for the Project.</p> <p>Given that the proponent has signed the voluntary agreement with the province and has recently released the draft Terms of Reference for consultation. Whenever appropriate, the Agency will coordinate the federal impact assessment with the provincial environmental assessment as outlined in the Cooperation Plan.</p> |
| General - Opposition to the Project | | |
| Aroland First Nation | Commented that a road extension into the Ring of Fire area is not supported at this time. | The Agency is aware of baseline studies being carried out for a potential expansion of the Project into the Ring of Fire area. However, such potential expansion was not submitted to the Agency yet. |
| General Project Description | | |
| Animbiigoo Zaagi'igan Anishinaabek First Nation Aroland First Nation Attawapiskat First Nation Eabametoong First Nation Marten Falls First Nation Environment and Climate Change Canada ESDC Fort Albany First Nation Health Canada (HC) Wildlife Conservation Society of Canada KWG Resources Noront Resources Ontario Ministry of Natural Resources and Forestry (MNRF) Ontario Ministry of Heritage, Sport, Tourism and Culture Industries (MHSTCI) Nibinamik First Nation Natural Resources Canada (NRCan) Transport Canada (TC) Women and Gender Equality Canada | <p>Commented on the lack of clarity, misleading information, or missing information in the Initial Project Description. This included clarity around number of water crossings, species at risk, navigable waters, financing in the long term, location of aggregate pits and work camps, timelines for construction, maps and community locations, studies done to date, effects, Indigenous community profiles, vulnerable populations, current tourism activities, and future mining information. Also commented on incorrect information on engagement activities, as well as inadequate mitigation measures to minimize potential effects.</p> | <p>The Agency posted comments received by the public, Indigenous groups, federal departments and provincial ministries on the Canadian Impact Assessment Registry and issued a summary of issues. The Agency directed the proponent to review the comments, including comments on information provided in the Initial Project Description, to support preparation of their Detailed Project Description. The Agency accepted the proponent's Detailed Project Description on November 22, 2019.</p> <p>The Agency will issue the Tailored Impact Statement Guidelines to the proponent by February 24, 2020 which provides direction to the proponent on the factors to be considered, the methodology to be followed and information requirements, in order to guide preparation of the Impact Statement. The draft Tailored Impact Statement Guidelines can be found on the Registry and are available for public comment from December 19, 2019 to January 28, 2020.</p> |

| General - Support for the Project | | |
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| <p>Animbiigoo Zaagi'igan Anishinaabek First Nation Noront Resources Fort Albany First Nation Marten Falls First Nation Nibinamik First Nation Individual member of the public</p> | <p>Commented that the Project will have positive benefits for the area. Potential environmental, health, social and economic effects including impacts on Indigenous peoples need to be taken into account in the impact assessment</p> | <p>The federal impact assessment process considers both positive and negative environmental, social, health and economic impacts of the Project including potential impacts on the exercise of Aboriginal and Treaty rights of Indigenous peoples. The Minister will evaluate proposed mitigation measures in making his decision on whether the Project can proceed.</p> |
| <p>Noront Resources</p> | <p>Noront would like to continue dialogue with the proponent, including a discussion around industrial use of the road. Noront will share information with the proponent to inform the design of the road and impact assessment studies. Information to be provided includes technical studies done by Cliffs Natural Resources.</p> | <p>The proponent is expected to engage with the public, including industry in the development of the Impact Statement. The Agency encourages Noront to discuss any information that could support the development of the proponent's Impact Statement directly with the proponent.</p> |
| <p>Marten Falls First Nation</p> | <p>Commented that Marten Falls First Nation has been conducting consultation with members of Marten Falls First Nation for three years in support of the impact assessment.</p> | <p>The Agency thanks the proponent for its efforts and notes that it has a responsibility to engage Indigenous groups, and the public, including industry, when developing the Impact Statement.</p> |
| Groundwater Quality | | |
| <p>Aroland First Nation</p> | <p>Commented the proponent should consider both positive and negative impacts of the Project to downstream communities.</p> | <p>The federal impact assessment process considers both positive and negative environmental, social, health and economic impacts of the Project including potential impacts on the exercise of Aboriginal and Treaty rights of Indigenous peoples. The Minister will evaluate proposed mitigation measures in making his decision on whether the Project can proceed.</p> |
| <p>Fort Albany First Nation Marten Falls First Nation Health Canada (HC) Natural Resources Canada (NRCan)</p> | <p>Concerned about potential effects to groundwater quality and drinking water, including from contamination to wetlands and cumulative effects.</p> | <p>The proponent is required to study potential effects to groundwater quality and drinking water as part of the impact assessment.</p> <p>Section 14.2 of the Tailored Impact Statement Guidelines indicates that effects of the Project on groundwater quality must be assessed during all phases of the Project.</p> <p>Section 16 of the Tailored Impact Statement Guidelines require an assessment on how human</p> |

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| | | health will be impacted by the future availability, quality and contamination of water for drinking. |
| Human Health and Well-Being | | |
| Health Canada (HC) | Commented that the Project may affect human receptors due to impacts on air quality, noise, water quality and country foods and disruption to surrounding peatlands and wetland areas, which may increase the mercury methylation processes. This will vary from construction phase to operation phase. | <p>The proponent is required to study potential effects to human health as part of the impact assessment.</p> <p>Section 16 of the Tailored Impact Statement Guidelines require an assessment of how human health will be impacted by the Project.</p> |
| Indigenous Consultation and Engagement (Method, Adequacy, etc.) | | |
| <p>Animbiigoo Zaagi'igan Anishinaabek First Nation</p> <p>Aroland First Nation</p> <p>Attawapiskat First Nation</p> <p>Constance Lake First Nation</p> <p>Fort Albany First Nation</p> <p>Webequie First Nation</p> <p>Nibinamik First Nation</p> <p>Attawapiskat First Nation</p> <p>Fort Albany First Nation</p> <p>Marten Falls First Nation</p> <p>Neskantaga First Nation</p> <p>Long Lake #58 First Nation</p> <p>Innovation, Science and Economic Development Canada represented by Federal Economic Development Initiative for Northern Ontario (FedNor)</p> <p>Two separate individual members of the public</p> <p>Infrastructure Canada (INFC)</p> <p>Indigenous Services Canada (ISC)</p> <p>Transport Canada (TC)</p> <p>Fisheries and Oceans Canada (DFO)</p> | Commented on the need for an early collaborative planning process with meaningful Indigenous consultation throughout the federal impact assessment, including during the design of the Project and the baseline studies being conducted, as well as, material being developed by the Agency for consultation. Information collected by the proponent and the impact assessment Agency of Canada must be informed by Indigenous knowledge and land use. Without adequate consultation and information collection, Indigenous groups will be unable to inform the Crown's decision making process. Commented on the importance of baseline data collection by the proponent. | <p>The proponent is required to engage with potentially impacted Indigenous groups in the development of the proponent's Impact Statement. The Agency will continue to lead federal Crown consultation for the Project as the impact assessment continues.</p> <p>The Agency consults with Indigenous groups as part of the impact assessment process for a variety of reasons, including: to ensure that impact assessments take into account Indigenous knowledge, cultural considerations and customs, to promote communication, relationship building, cooperation and partnership with Indigenous peoples, to meet the crown's common law duty to consult by ensuring respect and protection of rights and to work towards securing the free, prior and informed consent of Indigenous peoples for projects that are in the public interest.</p> <p>Comments and questions from Indigenous groups received by the Agency prior to and thus far during the planning phase informed the draft Tailored Impact Statement Guidelines. Indigenous groups are invited to provide further feedback during the upcoming</p> |

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| <p>Ontario Ministry of Heritage, Sport, Tourism and Culture Industries (MHSTCI)</p> | | <p>comment period to support the Agency in finalizing the Tailored Impact Statement Guidelines.</p> <p>Section 12 of the Tailored Impact Statement Guidelines require the proponent to engage with Indigenous groups to gather baseline information, incorporate Indigenous knowledge, identify potential effects of the Project on Indigenous peoples, and identify potential impacts of the Project on the exercise of Aboriginal and Treaty rights.</p> <p>The proponent must meaningfully engage with Indigenous groups throughout the impact assessment process. Section 6 of the Tailored Impact Statement Guidelines instructs the proponent to describe their record of engagement including the means and the results of that engagement.</p> |
| <p>Neskantaga First Nation, Nibinamik First Nation, Webequie First Nation</p> | <p>Commented that Indigenous land and resource policies and protocols inform the assessment process.</p> | <p>The Agency invites discussions to identify flexible participation approaches that support working with Indigenous communities to find opportunities for innovative practices that reflect the needs of communities and respect Indigenous cultures, traditions, customary laws and protocols, while ensuring transparency and fairness for all participants in the assessment.</p> <p>The Agency's Indigenous Engagement and Partnership Plan outlines how participation and consultation will occur throughout the impact assessment process, including where Indigenous communities are seeking collaboration and partnership. Community-specific consultation work plans may also be developed identify additional opportunities for participation or consultation during the impact assessment not already identified in the Indigenous Engagement Partnership Plan.</p> |

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| Attawapiskat First Nation | <p>Clarified whether the Agency be accepting comments on the Indigenous Engagement and Partnership Plan.</p> <p>Noted that any engagement will require reaching a satisfactory resolution of Attawapiskat First Nation's outstanding legacy issues with De Beers Canada, and evidence that Canada and Ontario are fully committed to, and are working towards, honouring the commitments set out in Mino-Wha-Ko-Me-To-Win, signed by Canada, Ontario, and Attawapiskat First Nation on July 29th, 2019.</p> | <p>The Agency requests input on the Indigenous Engagement and Partnership Plan on how the community would like to participate in the impact assessment process. The Agency encourages Indigenous groups to share any community-specific consultation preferences, including language and meeting preferences, that could help inform the Crown consultation and Indigenous participation in the impact assessment process.</p> <p>The Agency has shared Attawapiskat First Nation's interest to satisfactorily resolve legacy issue with the relevant federal and provincial authorities.</p> |
| Fort Albany First Nation Marten Falls First Nation | Consultation and engagement must respect Indigenous language preferences of communities. | The Agency encourages Indigenous groups to share any community-specific consultation preferences, including language and meeting preferences, that could help inform the Crown consultation and Indigenous participation in the impact assessment process. This will inform the Agency's preparation of the Indigenous Engagement and Partnership Plan. |
| Fort Albany First Nation Eabametoong First Nation Neskantaga First nation | Concern with provincial regulatory process and consultation related to the provincial environmental assessment process. | The Agency will share comments regarding provincial regulations and Ontario's environmental assessment process with the Province of Ontario. |
| Indigenous Services Canada (ISC) | Commented that a designation vote by the Chief and Council of Marten Falls First Nation to use reserve lands to develop the road may be required. | The Agency will share this comment with Marten Falls First Nation. |
| Attawapiskat First Nation Fort Albany First Nation | Commented that participation in the comment period does not imply the consent for any developments within the Ring of Fire area, including developments related to transport and resource exploitation within that area. | The Agency acknowledges that participation in the comment period does not imply the consent for any developments within the Ring of Fire area, including developments related to transport and resource exploitation within that area. |
| Fort Albany First Nation Neskantaga First Nation Individual Member of the Public | Commented that there needs to be government to government consultation on the Project. | The Agency does consider First Nations as Indigenous Governing Bodies. |
| Indigenous Knowledge | | |
| Fort Albany First Nation Animbiigoo Zaagi'igan Anishinaabek First Nation Marten Falls First Nation | Commented that Indigenous knowledge must be incorporated into planning, management, and operational decisions as well as during environmental data collection, monitoring studies, and identification of mitigation measures related to socio-economic and environmental assessment of exploration activities or potential developments. | The Agency consults with Indigenous groups as part of the impact assessment process for a variety of reasons, including to ensure that impact assessments take into account Indigenous knowledge, cultural considerations and customs, and to work towards securing the free, prior and informed |

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| | | <p>consent of Indigenous peoples for projects that are in the public interest.</p> <p>The proponent is required to engage with potentially impacted Indigenous groups in the development of the Impact Statement and incorporate any Indigenous knowledge made available by Indigenous groups. The Agency will continue to lead federal crown consultation for the Project as the impact Assessment continues.</p> |
| Indigenous Peoples Current Use of Lands and Resources for Traditional Purposes | | |
| Animbiigoo Zaagi'igan Anishinaabek First Nation Aroland First Nation Attawapiskat First Nation Fort Albany First Nation Neskantaga First Nation Marten Falls First Nation Natural Resources Canada (NRCan) | Concerned about the impacts on Indigenous peoples' ability to continue traditional practices, such as trapping and use of trap lines, hunting, fishing, harvesting, berry picking, medicinal plant harvesting, teaching, and spiritual practices as a result of the Project, future development activities in the Ring of Fire area, and outsider access to traditional territories | Section 19 of the Tailored Impact Statement Guidelines require the proponent to engage with Indigenous groups, in order to identify and understand the potential impacts of the Project on Indigenous peoples, and to include Indigenous knowledge into the impact assessment. This includes an assessment of potential effects of the Project on Indigenous peoples current use of lands and resources for traditional purposes (e.g. hunting, fishing, harvesting etc.) |
| Anishinabek Nation | Concerned about effects due to future development activities enabled by the Project. This includes activities outside of the Ring of Fire such as metal ore processing in Sudbury and Sault Ste. Marie and related effects on Indigenous peoples. | Section 22 of the Tailored Impact Statement Guidelines require the proponent to identify and assess cumulative effects of the Project. Cumulative effects are defined as changes to the environment, health, social and economic conditions as a result of the project's residual environmental, health, social and economic effects combined with the existence of other past, present and reasonably foreseeable physical activities, as well as within activities of the Project itself from multiple emissions and discharges (e.g. simultaneous operations) to understand synergistic or additive effects. |
| Fort Albany First Nation | Concerned about provincial land use permitting process that may be enabled in the future versus existing Cree family trap lines. | Questions and concerns with the provincial permitting processes will be shared with the Province of Ontario. |

| Indigenous Peoples' Economic Conditions | | |
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| Fort Albany First Nation Marten Falls First Nation | Concerned about Indigenous peoples' ability to participate in economic benefits, including self-employment options and youth, due to lack of training, skills development, employment, and technological infrastructure. Concern that an external workforce would be prioritized over a local workforce. Compensation needs to be considered if Indigenous peoples' are unable to benefit economically. | <p>Section 19 of the Tailored Impact Statement Guidelines require the proponent to assess potential effects on economic conditions of Indigenous peoples. The proponent is also encouraged to describe economic opportunities for Indigenous peoples.</p> <p>Funding for training for Indigenous people is provided by the Government of Canada. ESDC's Indigenous Skills and Employment Training (ISET) Program is delivered through a vast network of Indigenous agreement holders across the country including Ontario First Nations. ISET Program agreement holders provide a variety of services and wrap-around supports to ensure clients' success along the skills development, employment and earnings continuum. For example, Marten Falls First Nation is served by the Kiikenomaga Kekenjigewen Employment and Training Services (KKETS) www.kkets.ca. Along with the ISET Program agreement, KKETS also has an agreement under the ESDC's Skills and Partnership Fund (SPF), with projects focusing on mining and construction sectors.</p> |
| Fort Albany First Nation | Concerned about current economic conditions of Indigenous groups in the region including cost of food, poverty, cost of electricity, cost of living and how this would be impacted by the Project. | Section 19 of the Tailored Impact Statement Guidelines require the proponent to assess potential positive and negative effects on social, health and economic conditions of Indigenous peoples. |
| Fort Albany First Nation | | |

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| | <p>Commented on the need for services including legal aid, disability benefit resources, multimedia education as well as awareness and accessibility trainings, including in personal finance, career guidance, essential workplace and life skills, especially for vulnerable populations like women, youth, and elders.</p> | <p>Section 19 of the Tailored Impact Statement Guidelines require the proponent to assess potential positive and negative effects on social, health and economic conditions of Indigenous peoples.</p> |
| Fort Albany First Nation | <p>Commented on the need for awareness and accessibility trainings, including in personal finance, career guidance, essential workplace and life skills, especially for vulnerable populations like women, youth, and elders.</p> | <p>Section 19 of the Tailored Impact Statement Guidelines require the proponent to assess potential positive and negative effects on social, health and economic conditions of Indigenous peoples.</p> |
| Fort Albany First Nation | <p>Commented that Fort Albany First Nation uses the surrounding location of the Project for economic opportunities, as part of their ongoing governance and for location-based language and knowledge transfer. Commented that there are no plans by governments to allow First Nations to become economically self-sufficient.</p> | <p>Section 12 of the Tailored Impact Statement Guidelines require the proponent to engage with Indigenous groups to gather baseline information, incorporate Indigenous knowledge, identify potential effects of the Project on Indigenous peoples, and identify potential impacts of the Project on the exercise of Aboriginal and Treaty rights. Section 12.3 of the Tailored Impact Statement Guidelines directs the proponent to include a description of baseline conditions of Indigenous peoples' health, social and economic conditions.</p> |
| Employment and Social Development Canada (ESDC) | <p>Commented that the department provides funding for training and other supports through the Indigenous Skills and Employment Training Program through various partnerships, including Matawa Tribal Council (Kiikenomaga Kikenjigewen Employment and Training Services (KKETS)) and Mushkegowuk Tribal Council (Mushkegowuk Council Employment and Training Services (METS)).</p> | <p>The Agency will share this information with the proponent.</p> |

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| Innovation, Science and Economic Development Canada represented by Federal Economic Development Initiative for Northern Ontario (FedNor) | Commented that the OECD report "Linking Indigenous Communities with Regional Development, 2019" ¹ should be considered. | The Agency will share this information with the proponent. |
| Indigenous Services Canada (ISC) | Commented that there could be both positive and negative effects (including environmental, economic, health and social) on Indigenous groups as a result of the Project. Those impacts will be disproportionately felt. | Section 19 of the Tailored Impact Statement Guidelines require the proponent to assess potential positive and negative effects on social, health and economic conditions of Indigenous peoples. |
| Marten Falls First Nation | Commented that the Project may help make the Marten Falls First Nation reserve more accessible, which could have a positive impact on food costs and quality, transportation costs, and housing costs. | Section 19 of the Tailored Impact Statement Guidelines require the proponent to assess potential positive and negative effects on social, health and economic conditions of Indigenous peoples. |
| Fort Albany First Nation | Commented about effects on traditional economies, including harvesting. | Section 19 of the Tailored Impact Statement Guidelines require the proponent to assess potential effects on economic conditions of Indigenous peoples. The proponent is also encouraged to describe economic opportunities for Indigenous peoples. |
| Indigenous Peoples' Health Conditions | | |
| Aroland First Nation Marten Falls First Nation | Commented about the increased number of pregnancies, sexual violence, sexually transmitted infections and gender-based violence on women and youth resulting from increased accessibility. | Section 19 of the Tailored Impact Statement Guidelines require the proponent to assess potential positive and negative effects on social, health and economic conditions of Indigenous peoples. |
| Environment and Climate Change Canada (ECCC) Fort Albany First Nation | Commented that reduced air quality, air emissions and dust, as well as atmospheric changes may cause adverse effects on sensitive receptors, such as Indigenous peoples. | Section 19 of the Tailored Impact Statement Guidelines require the proponent to assess potential positive and negative effects on social, health and economic conditions of Indigenous peoples. |
| Aroland First Nation Fort Albany First Nation Neskantaga First Nation | Commented about malnutrition, country food contamination (including fish), diabetes, cardiovascular issues, accessibility of health-care services, as well as, mental health, issues of self-esteem, and spiritual health | Section 19 of the Tailored Impact Statement Guidelines require the proponent to assess potential positive and negative effects on social, health and economic conditions of Indigenous peoples. |
| Indigenous Peoples: Exercise of Aboriginal and Treaty Rights | | |

¹ <http://www.oecd.org/regional/regional-policy/indigenous-communities.htm>

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| <p>Animbiigoo Zaagi'igan Anishinaabek First Nation Aroland First Nation Attawapiskat First Nation Eabametoong First Nation Fort Albany First Nation Justina Ray on behalf of the Wildlife Conservation Society of Canada Nibinamik First Nation Webequie First Nation Neskantaga First nation Two separate individual members of the public</p> | <p>Commented that consultation with Indigenous peoples is required to understand the Project's potential impacts on the exercise of Aboriginal and Treaty rights, including impacts on traditional territory and way of life. The assessment should consider access and use of land and resources, Indigenous language, spirituality, Indigenous child rearing and parenting skills, family trap lines, Nationhood, Indigenous values, culture and heritage, and choice of livelihood and vocation.</p> | <p>Section 19 of the Tailored Impact Statement Guidelines require the proponent to engage with each Indigenous group potentially impacted by the Project and document each community's exercise of Aboriginal and Treaty rights protected under section 35 of the <i>Constitution Act, 1982</i>. The proponent is expected to seek the community's perspectives on the lands, resources and exercise of rights in the areas that could change as a result of the Project. In addition, the Impact Statement must document the potential project-related impacts on those exercise of rights (including due to effects on the valued components) and include appropriate mitigation and follow-up program measures. These may be suitable accommodation measures proposed to address impacts on the exercise of rights. The Impact Statement must also document each Indigenous group's views on the effects, impacts and measures.</p> |
| <p>Marten Falls First Nation</p> | <p>Commented that Marten Falls First Nation will be most impacted by the Project.</p> | <p>The Agency acknowledges Marten Falls First Nations views but still requires the community as the proponent to follow the requirements outlined in the Tailored Impact Statement Guidelines.</p> |
| <p>Neskantaga First Nation Nibinamik First Nation Wildlife Conservation Society of Canada</p> | <p>Commented that regional infrastructure was an objective under the Matawa Regional Framework Agreement. Commented that the proponent needs to respect the terms agreed during the Regional Framework negotiations between the nine First Nations regarding an enhanced environmental assessment process, and Jurisdiction Principles. Concern that there is no longer a regional approach to development in the Ring of Fire area.</p> | <p>The Agency acknowledges the comment but notes that its role is to conduct impact assessments on projects that are subject to the <i>Physical Activities Regulations</i> pursuant to the <i>Impact Assessment Act</i>.</p> |
| <p>Neskantaga First Nation</p> | <p>Commented that the Project would subject to Neskantaga's environmental assessment process. But, then later noted that the community would provide new information.</p> | <p>The Agency acknowledges the comment and requests that Neskantaga First Nation provide information on how it wishes to be consulted to inform the Indigenous Engagement and Partnership Plan.</p> |
| <p>Fort Albany First Nation</p> | <p>Commented that Fort Albany First Nation has been told they were not considered an Indigenous jurisdiction in the context of federal assessment projects.</p> | <p>The Agency does not consider Fort Albany First Nation as an Indigenous jurisdiction under the <i>Impact Assessment Act</i>. However, the First Nation is still considered an Indigenous Governing Body.</p> |
| <p>Indigenous Peoples' Social Conditions</p> | | |

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| <p>Animbiigoo Zaagi'igan Anishinaabek First Nation Aroland First Nation Fort Albany First Nation Indigenous Services Canada (ISC) Marten Falls First Nation Women and Gender Equality Canada (WAGE)</p> | <p>Commented that there are positive benefits to having access to the provincial highway network, such as access to health care and education, and reduced cost of goods.</p> | <p>The Agency notes that sections 16, 17 and 18 of the Tailored Impact Statement Guidelines require the proponent to assess the Project's positive effects on health, social and economic conditions.</p> |
| <p>Indigenous Services Canada (ISC) Employment and Social Development Canada (ESDC) Fort Albany First Nation</p> | <p>Commented about impacts on Indigenous peoples' social conditions, such as access to and demand for technology, demographic changes, quality of life, family structure, youth delinquent issues, child hunger, poverty, elder women and child abuse, xenophobia issues, child rearing responsibilities, single parenting, bush survival skills, loss of elders as teachers of culture/heritage, loss of spirituality, loss of language, loss of culture, urbanization, loss of family homelands, and alteration of social values.</p> | <p>Sections 17 and 19.1 of the Tailored Impact Statement Guidelines require the proponent to assess the Project's adverse effects on social conditions, including access to and demand for technology, demographic changes, quality of life, family structure, youth delinquent issues, child hunger, poverty, elder women and children abuse, xenophobia issues, child rearing responsibilities, single parenting, bush survival skills, loss of elders as teachers of culture/heritage, loss of spirituality, loss of language, loss of culture, urbanization, loss of family homelands, and alteration of social values.</p> |
| <p>Fort Albany First Nation Aroland First Nation Marten Falls First Nation</p> | <p>Commented about Indigenous groups' safety as a result of new activities, such as the use of alcohol, smoke and drugs, including the driving under the influence, and increased traffic collisions.</p> | <p>Sections 16, 17 and 19.1 of the Tailored Impact Statement Guidelines require the proponent to assess Project's adverse effects on health and social conditions, including effects arising from substances misuse, traffic collisions, and potential vandalism.</p> |
| <p>Fort Albany First Nation</p> | <p>Commented about the historical impacts on Indigenous groups and the resulting legacy issues, including negative social impacts and loss of economic opportunities.</p> | <p>Section 22 of the Tailored Impact Statement Guidelines require the proponent to identify and assess cumulative effects of the Project. The assessment would look and social and economic impacts beyond those of the proposed project, including past, present and reasonably foreseeable projects.</p> |
| <p>Neskantaga First Nation</p> | <p>Commented on the importance of the familial structures that exists amongst the First Nation communities in the Project area. It is important to maintain unity amongst Indigenous communities to ensure healthy relationships.</p> | <p>Sections 16, 17 and 19.1 of the Tailored Impact Statement Guidelines require the proponent to assess Project's adverse effects on health and social conditions.</p> |
| <p>Indigenous Physical and Cultural Heritage</p> | | |

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| <p>Animbiigoo Zaagi'igan Anishinaabek First Nation Attawapiskat First Nation Fort Albany First Nation Aroland First Nation Neskantaga First Nation Marten Falls First Nation</p> | <p>Commented about impacts to cultural heritage and archaeological resources of Indigenous groups, such as burial sites and locations used for the purpose of teaching.</p> <p>In particular, the Muketai River and Kagami Falls are mentioned as an important cultural site.</p> | <p>Section 12.1 of the Tailored Impact Statement Guidelines requires the proponent to describe the historical baseline conditions associated with Indigenous physical and cultural heritage, including archaeological resources.</p> <p>Section 17.6 and Section 19 of the Tailored Impact Statement Guidelines require the proponent to assess the Project's adverse effects on traditional cultural activities and cultural heritage and archaeological resources of importance to Indigenous groups.</p> |
| Mitigation Measures | | |
| <p>Animbiigoo Zaagi'igan Anishinaabek First Nation Attawapiskat First Nation Fisheries and Oceans Canada (DFO) Health Canada (HC) Wildlife Conservation Society of Canada</p> | <p>Mitigation measures will be needed to minimize the impacts to the natural environment and Indigenous people using the land.</p> <p>Commented that there is a lack of detail provided by the proponent regarding mitigation measures.</p> | <p>The proponent will be expected to identify mitigation measures to address adverse effects as well as follow-up program measure to verify mitigation measures and assessment predictions and include these in the Impact Statement. Section 19 of the Tailored Impact Statement Guidelines require the proponent to engage with each Indigenous groups.</p> |
| Navigable Waterways | | |
| <p>Fort Albany First Nation Justina Ray on behalf of the Wildlife Conservation Society of Canada</p> | <p>Concerned about impacts to navigable waters and the ability to travel through watercourses.</p> | <p>Sections 10 and 17.3 of the Tailored Impact Statement Guidelines require a description of the current use of waterways in the project area for navigation and the potential adverse effects of the Project on navigation.</p> <p>Section 26 of the Tailored Impact Statement Guidelines require the proponent to propose follow-up program measures to verify effectiveness of mitigation measures or assessment predictions where there is uncertainty. The assessment is expected to cover all phases of the Project</p> |

| Other | | |
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| Attawapiskat First Nation | Asked how the impact assessment will address the use of chemicals throughout the Project. | <p>Section 3.2.1 and 3.2.2 of the Tailored Impact Statement Guidelines require a description of storage and handling of petroleum products, chemical products, explosives, hazardous waste, and hazardous materials and residual materials, as well as a description of waste management and recycling.</p> <p>Section 23.1 of the Tailored Impact Statement Guidelines require the proponent include an assessment of potential accidents and malfunctions, including potential for minor and major accidental spills of fuel or contamination.</p> |
| Fort Albany First Nation | Asked why a single First Nation was receiving a high level of funding for such a project. | The Agency will share the comment with the proponent and Ontario. The Agency's role is to conduct impact assessments on projects that are subject to the <i>Physical Activities Regulations</i> pursuant to the <i>Impact Assessment Act</i> . |
| Fort Albany First Nation | Commented that the Ontario Ministry of Natural Resources and Forestry (MNRF) should not be issuing permits at this time. | The Agency acknowledges the community's interest in MNRF permitting in the area. This comment will be shared with MNRF. |
| Webequie First Nation | Commented that people dump diesel fuel and nothing has been done about it. The community has bigger problems. | The Agency will determine if there is a contact at Indigenous Services Canada to whom such spills should be reported. |
| Fort Albany First Nation Long Lake #58 First Nation Aroland First Nation | Commented about provincial and federal regulations, policies and government bureaucracy, including roles and responsibilities | Section 2.4 of the Tailored Impact Statement Guidelines require a description of legislation and regulatory approvals applicable to the Project at all levels of government (federal, provincial, and municipal). Anticipated federal permits for the Project are outlined in the Permitting Plan. |
| Project Contribution to Sustainability | | |
| Animbiigoo Zaagi'igan Anishinaabek First Nation Environment and Climate Change Canada (ECCC) | <p>Commented that the Project needs to be sustainable including minimizing impacts to the environment and people who use the land.</p> <p>Commented that considerations need to be made about whether the Project hinders or contributes to the Government of Canada's ability to meet its environmental obligations.</p> | Sections 24 and 25 of the Tailored Impact Statement Guidelines require an assessment of how the Project will contribute to Canada's ability to meet its environmental obligations and climate change commitments, and must include a description of how the Project contributes to sustainability. |
| Project Expansion | | |

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| Aroland First Nation Eabametoong First Nation Neskantaga First Nation Fort Albany First Nation | <p>Decisions around development in the Ring of Fire must be made collectively with First Nations to ensure that the exercise of rights and values of potentially impacted First Nations are respected and protected.</p> <p>Commented about the lack of information on Project's scope and potential expansion, including cumulative effects, as well as on baseline studies being carried out for the road expansion to the Ring of Fire area.</p> | <p>The Agency will share the comment with the proponent and Ontario. The Agency's role is to conduct impact assessments on projects that are subject to the <i>Physical Activities Regulations</i> pursuant to the <i>Impact Assessment Act</i>.</p> <p>Section 22 of the Tailored Impact Statement Guidelines require the proponent to identify and assess cumulative effects of the Project. This assessment must consider the larger context surrounding the Project, including reasonably foreseeable future developments that will use project infrastructure and activities that may be enabled by the Project.</p> |
| Purpose of and Need for the Project | | |
| Wildlife Conservation Society of Canada KWG Resources Noront Resources Nibinamik First Nation | <p>Commented about the lack of information on Project's scope and potential expansion, including cumulative effects, as well as on baseline studies being carried out for the road expansion to the Ring of Fire area.</p> | <p>Section 2.2 of the Tailored Impact Statement Guidelines require the proponent to outline the larger context surrounding the Project, including reasonably foreseeable future developments that will use project infrastructure and activities that may be enabled by the Project.</p> <p>Section 22 of the Tailored Impact Statement Guidelines require the proponent to identify and assess cumulative effects of the Project. This assessment must consider the larger context surrounding the Project, including reasonably foreseeable future developments that will use project infrastructure and activities that may be enabled by the Project.</p> |
| Regional Assessment | | |
| Wildlife Conservation Society of Canada | <p>Commented that there is a need for a regional assessment to support land use planning, and understand cumulative effects, including to freshwater, exercise of Aboriginal and treaty rights, and climate change.</p> | <p>In accordance with section 9 of the <i>Impact Assessment Act</i>, the Minister for Environment and Climate Change will provide a response on this matter at a later date.</p> |
| Riparian and Wetland Environments | | |

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| <p>Aroland First Nation Environment and Climate Change Canada (ECCC) Fort Albany First Nation Wildlife Conservation Society of Canada Anishinabek Nation Ontario Ministry of Natural Resources and Forestry (MNRF)</p> | <p>Commented about effects to riparian and wetland environment, wetland plant species, buffer zones, water levels in the muskeg and decreased bank stability, due to changes to water levels, water contamination, habitat loss, spread of invasive species, and disturbance.</p> | <p>Sections 14.3 and 20 of the Tailored Impact Statement Guidelines requires the proponent to assess hydrological or drainage changes that may alter moisture regimes and effects of related changes to vegetation and wetland function; soils, peat or muskeg.</p> <p>Sections 8.5 and 15.5 of the Tailored Impact Statement Guidelines requires the proponent to assess effects related to carbon sinks, including from the removal and alteration of wetlands, and on wetland evaluation.</p> <p>Section 26 of the Tailored Impact Statement Guidelines require the proponent to propose follow-up program measures to verify effectiveness of mitigation measures or assessment predictions where there is uncertainty. The assessment is expected to cover all phases of the Project.</p> |
| Species at Risk | | |
| <p>Aroland First Nation Attawapiskat First Nation Environment and Climate Change Canada (ECCC) Wildlife Conservation Society of Canada</p> | <p>Concern about impacts on Caribou including habitat fragmentation, vibrations and noise, mortality of vehicle collisions, increased predation, barriers to dispersal and migration, impacts from monitoring collars and cumulative effects.</p> <p>Concerned about the impacts to species at risk including habitat destruction and fragmentation, increased competition from invasive species, changes to air quality, sensory disturbance and collisions with vehicles. Species include, but are not limited to, Eastern Whip-poor-Will, Common Nighthawk, Rusty Blackbird, Woodland Caribou, Wolverine, reptile and plant species.</p> | <p>Section 15.4 and 20 of the Tailored Impact Statement Guidelines require the proponent to assess adverse effects on Species at Risk (such as caribou, bats, wolverine, reptile species, Yellow Rail, Eastern Whip-poor-Will, Rusty Blackbird, and Common Nighthawk). The proponent would also assess changes to habitat, including impacts from habitat destruction and fragmentation, sensory disturbance (such as noise and vibration), increased predation, mortality due to vehicle collisions, invasive species, impacted air quality, poaching, and barriers to migration. The assessment must evaluate movements of collared individuals using quantitative methods (e.g., step analysis), to determine existing movement corridors, and how these maybe affected by project development. The proponent must indicate how they intend to mitigate the effects in the Impact Statement.</p> |
| Structure, site, things of historical, archaeological, paleontological or architectural significance | | |
| <p>Ontario Ministry of Heritage, Sport, Tourism and Culture Industries (MHSTCI)</p> | <p>Commented that a cultural heritage existing conditions and preliminary impact assessment report should be undertaken for the entire study area with consultation</p> | <p>Section 12.1 of the Tailored Impact Statement Guidelines require the proponent include baseline information on the current physical and cultural</p> |

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| | from Indigenous groups. There are no Stage 2 assessment reports for the area that have been submitted to MHSTCI. | heritage in the project area, which includes but is not limited to, any structure, site or thing of archaeological, paleontological, historical or architectural significance. |
| Surface Water Quality and Quantity | | |
| Anishinabek Nation Aroland First Nation Attawapiskat First Nation Neskantaga First Nation Marten Falls First Nation Environment and Climate Change Canada (ECCC) Fort Albany First Nation Fisheries and Oceans Canada (DFO) Health Canada (HC) Natural Resources Canada (NRCan) Individual member of the public | Commented about contamination, sedimentation, dust deposition, erosion, petroleum/chemical spills, water quality and quantity, permanent disruption of wetlands hydrology, cumulative effects, potable water and other adverse effects to surface water quality and waterbeds, including the Albany River and downstream of the Project. | Section 14.2, 14.3 and 20 of the Tailored Impact Statement Guidelines requires the proponent to assess effects of the project on surface water quality, including effects from dust deposition, chemical spills, or runoff of sediments during all phases of the project, and any hydrological or drainage changes that may alter moisture regimes and related changes to vegetation and wetland function. Section 26 of the Tailored Impact Statement Guidelines require the proponent to propose follow-up program measures to verify effectiveness of mitigation measures or assessment predictions where there is uncertainty. The assessment is expected to cover all phases of the Project. |
| Terrestrial Wildlife and their habitat | | |
| Animbiigoo Zaagi'igan Anishinaabek First Nation Aroland First Nation Attawapiskat First Nation Marten Falls First Nation Environment and Climate Change Canada (ECCC) Fort Albany First Nation Anishinabek Nation Ontario Ministry of Natural Resources and Forestry (MNRF) Natural Resources Canada (NRCan) | Commented about effects on wildlife, including due to noise, habitat disruption, changes to home range and movement patterns, road collisions, human disturbance, sensory disturbance, and increased recreational activities. | Sections 15.3 and 15.4 of the Tailored Impact Statement Guidelines require the proponent to address matters related to terrestrial wildlife and their habitat and on species at risk such as caribou. Key changes to species that are important for current use of land and resources, including moose, must also be assessed. Impacts such as from habitat destruction and fragmentation, sensory disturbance (such as noise and vibration), mortality due to vehicle collisions, and barriers to migration must also be assessed. |
| Topography, Soil and Sediment | | |
| Fort Albany First Nation | Commented about aggregate sourcing for the road. | Section 3.1 of The Tailored Impact Statement Guidelines require the proponent to describe the borrow pits, gravel or aggregate pits and quarries (footprint, location, ownership, and development |

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| | | <p>plans including pit phases and lifespan), including their location in relation to permafrost terrain, where applicable.</p> <p>The proponent must also include a description of the aggregate extraction and production methodology and planned aggregate extraction facilities.</p> |
| Natural Resources Canada (NRCan) | Commented about impacts to soil erosion, sediment control, and permafrost. | <p>Section 20 of the Tailored Impact Statement Guidelines require the proponent to include a Sediment and Erosion Control Plan for the Project, including the proposed mitigation measures and their effectiveness on the contaminants of concern.</p> <p>Sections 8.3, 8.6 and 14.3 of the Tailored Impact Statement Guidelines require the proponent to assess if permafrost occurs in the project area and describe the current permafrost conditions and any changes expected as a result of the Project.</p> |
| Vegetation | | |
| Aroland First Nation Environment and Climate Change Canada (ECCC) Fort Albany First Nation Anishinabek Nation Natural Resources Canada (NRCan) | Commented that there is potential for loss and adverse effects to native and rare vegetation due to construction activities, use of roadside herbicides, soil disturbances and the introduction of invasive plant species, such as European Common Reed (<i>Phragmites australis</i>). | <p>The Tailored Impact Statement Guidelines include requirements for the proponent to address these matters as follows:</p> <ul style="list-style-type: none"> - Sections 14.3 and 20 on matters related to effects of the Project on vegetation, including effects to native and rare vegetation, and on approaches to prevent the road from becoming a conduit for invasive species, such as the European Common Reed. - Section 15.5 on a qualitative description of how the Project will impact carbon sinks, including from the removal and alteration of wetlands. - Sections 8.8 and 20 on planned herbicide use to control vegetation, and how the proponent intends to mitigate the effects. The effects of herbicide use on country foods must also be assessed, including the mitigation responses to herbicide application. - Section 26 of the Tailored Impact Statement Guidelines require the proponent to propose follow-up program measures to verify effectiveness of mitigation measures or assessment predictions where there is |

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| | | uncertainty. The assessment is expected to cover all phases of the Project |
| Vulnerable Population Groups (GBA+) | | |
| Aroland First Nation Women and Gender Equality Canada (WAGE) | Commented that GBA+ analysis should be conducted to adequately understand the Impacts on vulnerable population groups, such as women, disabled persons, elders and youth as a result of gender-based violence, greater spread of sexually transmitted infections, increased accessibility, human trafficking, the influx of male workers, increased mobility and job opportunities as a result of the Project and foreseeable future projects in the area. | Throughout the text, the Tailored Impact Statement Guidelines directs the proponent to undertake Gender Based Analysis Plus analysis to characterize the impacts of the Project on vulnerable population groups. This includes an assessment of potential adverse and positive changes to human health, social conditions and economic conditions disaggregated by gender. Effects to human health may include access to health services by various subgroups of the population. Effects to social conditions may include impacts to gender-based violence, human trafficking, sexual and physical violence, and employment opportunities. |
| Women and Gender Equality Canada (WAGE) | Commented that stakeholder mapping is a useful tool to assess stakeholder groups and identify the opportunities and barriers affecting the participation of different stakeholders that may be marginalized, particularly for women, Indigenous peoples, youth and people with disabilities. | The Tailored Impact Statement Guidelines provide the proponent with instructions to engage with Indigenous groups, including groups identified by gender, age, or community relevant factors (e.g. hunters, trappers, and other harvesters) to support the collection of information needed to complete the GBA+. The proponent must describe their efforts to engage with various subgroups. |
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| Women and Gender Equality Canada (WAGE) | Commented that there is a lack of detailed overview of the target group(s) and local context in the Initial and Detailed Project Descriptions to clearly identify the segments of the population that will either benefit or be negatively impacted (directly or indirectly) by the Project. | <p>The Tailored Impact Statement Guidelines direct the proponent to conduct a GBA+ analysis to assess the effects of the Project on various sub-groups in the communities. The effects of the Project on community well-being and public safety must also be considered, including how the Project may impact violent crime, human trafficking, sexual and physical violence.</p> <p>The proponent must also describe how disproportionate effects identified with GBA+ results were used to inform mitigation measures of the Project.</p> |
| Waste and Wastewater | | |
| Fort Albany First Nation | Commented about impacts from pollution, waste, including hazardous waste, and wastewater disposal. | Section 3 of the Tailored Impact Statement Guidelines require the proponent to describe how waste and wastewater will be managed, treated and/or disposed in the Impact Statement. They must also describe the types of waste that will be generated during all phases of the Project. |
| Federal and Provincial Permits | | |
| Fisheries and Oceans Canada, Environment and Climate Change Canada, Ontario Ministry of Heritage, Sport, Tourism and Culture Industries , Natural Resources Canada, Transport Canada, Indigenous Services Canada, Webequie First Nation | Federal and provincial permits and authorizations may be required for components of the Project. Further consultation may be required on certain permits and authorizations. | Detail regarding federal permits and authorizations that may be required for the Project will be listed in the Permitting Plan. Comments the Agency receives from the province regarding provincial permits are posted on the Registry for the proponent's review. |