

Information on caribou to inform the federal analysis of effects on current use of lands and resources for traditional purposes by Indigenous Peoples

The Impact Assessment Agency of Canada (IAAC) is focusing on the key issues that are relevant for federal impact assessment decision-making, specifically adverse federal effects and public interest factors. Regarding adverse federal effects, IAAC aims to understand where standard mitigation measures would apply and the proponent’s proposed mitigation seems appropriate, where existing legislative frameworks can be leveraged, and where oversight and protections from federal and provincial laws can build confidence that effects would be managed and potentially impacted Indigenous communities would be consulted or engaged.

To support IAAC’s preparation of the draft Impact Assessment Report for the Marten Falls Community Access Road project, please provide responses to the questions related to caribou in the table below. IAAC assigned questions to Environment and Climate Change Canada (ECCC) and to Ontario Ministry of the Environment, Conservation and Parks (MECP). The questions seek expert or specialist information and knowledge that will inform IAAC’s analysis of the project-specific key issues and the preparation of the draft Impact Assessment Report.

Note that the Marten Falls Community Access Road Project, Webequie Supply Road Project, and Northern Road Link projects are located in the same region and that IAAC already sent you questions on the effects of the Webequie Supply Road project on caribou that support the current use of lands and resources for traditional purposes, requesting that all three road projects be considered in your responses. To ensure efficiency in the impact assessment processes, IAAC will consider your responses for the Webequie Supply Road Project for all three projects. As such, when responding to the questions below, please be as specific as possible on where IAAC should consider the responses for the Webequie Supply Road Project and where distinct considerations apply to the Marten Falls Community Access Road project.

When completed, please return this form to IAAC via martenfalls@iaac-aeic.gc.ca.

Recipient	Question	Response
Effects to Current Use of Lands and Resources for Traditional Purposes - Changes to Caribou That Support Indigenous Hunting		
		<p>IAAC expects non-negligible adverse changes to caribou and their habitat.</p> <p>Caribou:</p> <p>IAAC understands that Indigenous communities hunt boreal caribou for consumption and subsistence along Attawapiskat River, around McFaulds Lake, along Muketei River, and within the Asheweig River, Ekwan, Winisk and Attawapiskat watersheds. IAAC notes that these areas do not intersect with the Marten Falls Community Access Road project footprint, but that the effects of the project on caribou may nonetheless have effects on caribou hunting in these areas.</p> <p>IAAC notes that boreal caribou are protected on private and provincial Crown land in Ontario under the <i>Endangered Species Act, 2007</i> (ESA). IAAC understands that this framework aims to achieve an overall benefit to the species through implementation of permit conditions that would allow an adverse change to caribou or its habitat. IAAC also understands from the Endangered Species Act Submission Standards¹ that overall benefit actions that focus on the local population or habitat adversely affected by an activity are preferred in decision-making. Further, IAAC notes that the province would consult Indigenous communities prior to making decisions under the ESA, including consultation undertaken as part of the environmental assessment.</p> <p>The Marten Falls Community Access Road project proponent indicated that linear infrastructure would increase the presence of caribou predators. The proponent’s Impact Statement (IS) indicates that sensory disturbance during construction and maintenance activities likely would result in avoidance; however, predation of caribou still is expected to occur. The proponent has identified the following mitigation measures to address increased predation from the presence of linear features: minimizing vegetation clearing; retaining vegetation under two meters along linear features; minimizing width of linear features; including switchbacks and bends in temporary roads; installing visual barriers in areas used by predators; and implementing adaptive management during the operation phase.</p> <p>Sensory disturbance to caribou is anticipated over the life of the project. The Marten Falls Community Access Road project proponent suggested that sensory disturbances during the construction phase may impact caribou behaviour and that most effects are expected within five kilometres from the Construction Disturbance Area (CDA) consisting of the project footprint, including roadway and ancillary features. In addition, the proponent suggested that sensory disturbances, from road traffic would occur up to 500 metres from the CDA, during the operation phase. Sensory disturbances from future mining trucks would be focused primarily in the southern (north-south) portion of the road, whereas caribou habitat is more prevalent in the northern (east-west) portion of the road. The proponent has identified the following mitigation measures for sensory disturbance during the construction and operation phases of the project: avoiding disruptive construction activities during sensitive window; noise abatement, emission and pollution control equipment on machinery; and enforcement of speed limits to reduce noise from traffic.</p>

¹ <https://www.ontario.ca/page/endangered-species-act-submission-standards>

Environment and Climate Change Canada's response to Impact Assessment Agency of Canada's request for information on Caribou, MFCAR

Recipient	Question	Response
Caribou habitat:		
<p>The proponent's Impact Statement identified pockets of category 1 boreal caribou habitat in the northern portion of the road corridor. The habitat extends up to the James Bay and Hudson's Bay coasts (Appendix M, Figure 5-15 and Figure 5-16).</p> <p>The proponent indicated that project construction would result in minimal loss of boreal caribou habitat in the caribou Local Study Area and the Regional Study Area. The proponent defines the caribou Local Study Area as the area that is 10 km on either side of the right-of-way of the route alternatives, and the caribou Regional Study Area includes the provincial Missisa, Ozhiski, Nipigon and Pagwachuan ranges. The proponent has indicated that 6.6% and 0.2% of category 1 habitat would be removed from the Local Study Area and Regional Study Area, respectively, and has identified mitigation measures to further minimize effects of habitat loss. Measures include, minimizing vegetation clearing; maintaining connectivity, function and quality of compatible habitat; revegetating cleared areas; and implementing methods to speed up vegetation regrowth. In addition, a terrestrial offsetting plan, with a purpose to achieve a net increase in functional caribou habitat, was proposed by the proponent.</p>		
Current population status		
1: ECCC, MECP	What is the baseline status of boreal caribou and eastern migratory caribou populations in the Missisa, Ozhiski, Nipigon and Pagwachuan ranges (i.e. without the project)?	<p>Please refer to ECCC's response to IAAC's caribou questions for the Webequie Supply Road Project (WSR) which were provided to IAAC on March 6, 2026 for this and other questions as indicated below as they are also relevant to the Marten Falls Community Access Road Project (MFCAR), along with the following distinct considerations regarding Nipigon and Pagwachuan ranges.</p> <p>Nipigon and Pagwachuan are boreal caribou ranges delineated at both the federal and provincial level and are adjacent to the southern limit of the federal Far North range.</p> <p>Nipigon and Pagwachuan ranges are above the minimum undisturbed habitat threshold (68% and 71% undisturbed, respectively; ECCC 2024). Anthropogenic habitat disturbance increased 1% (25 to 26%, ~39,000 ha) in Nipigon and 2% (27-29%, ~91,000 ha) in Pagwachuan between 2015 and 2020 (based on Landsat imagery interpretation with a 500 m buffer applied to all linear and polygonal disturbances; ECCC 2024). Boreal Caribou population size and trend data were not available for these ranges in the most recent federal progress report on implementation in 2024; however, in 2017, population size for both Nipigon and Pagwachuan was estimated between 100-300 individuals, with a declining population trend for Nipigon and a stable population trend for Pagwachuan.</p> <p>Ontario is best placed to provide comment on the current baseline status of caribou in these ranges. According to MNRF 2014a, population trend data in Nipigon range from 2009-2012 suggested that the population is in short-term decline, with a minimum animal count of 172 in 2010. Similarly, the short-term population trend was likely declining in Pagwachuan, based on 2009-2012 data, with a minimum animal count of 164 in 2011 (MNRF 2014b).</p>
Changes to population due to the project		
2: ECCC, MECP	Indicate what type of caribou habitat might be lost (e.g. due to habitat clearing) or disturbed (e.g. due to sensory disturbance such as noise) due to the project, namely Category 1 (nursery areas, winter use areas, travel corridors), Category 2 (seasonally important areas) or Category 3 (other habitat), and indicate the location of the Category 1, 2 or 3 habitat areas anticipated to be lost or disturbed.	<p>Ontario will be best placed to comment on the amount and location of Category 1, 2, and 3 habitats within the project area.</p> <p>ECCC offers the following comments in relation to Category 1 high use habitats (lowest tolerance to alteration):</p> <ul style="list-style-type: none"> The proponent indicates that 17,514 ha of Category 1 caribou habitat (including nursery areas, winter use areas, and travel corridors) will be lost as a result of the project, which represents a decrease of 6.7% relative to the existing conditions within the LSA. <p>Category 2 seasonal habitat (moderate tolerance to alteration) and Category 3 habitat remaining area in range (highest tolerance):</p> <ul style="list-style-type: none"> The proponent indicates that 9,316 ha of Category 2 habitat will be lost, a decrease of 6.3% within the LSA, and that 31,701ha would be added as 'Category 3 permanent disturbance', recognizing that Category 3 is defined as the remaining areas within the range.

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		<ul style="list-style-type: none"> Ontario’s General Habitat Description for Forest Dwelling Woodland Caribou, indicates that Category 3 habitat generally has a “higher tolerance to alteration when compared to other, currently occupied sub-range habitat features. However, permanent or long-term anthropogenic disturbances such as large linear corridors and other disturbances that fragment or alter forest cover composition, will diminish their future function. The future provision of seasonal ranges (with nested potential high use areas) is critical to long-term caribou persistence within a range.” <p>In terms of federal critical habitat, the proposed MFCAR corridor is predominately within the federal Far North Range for boreal caribou but also extends into the Nipigon range (and the LSA overlaps with the Pagwachuan range). See ECCC’s response to IAAC’s caribou questions for WSR for information related to critical habitat within the Far North range, which also applies to Nipigon and Pagwachuan.</p>
<p>3: ECCC, MECP</p>	<p>Discuss, given the above noted habitat that would be lost or disturbed, the anticipated effects of the project on the caribou populations in the Missisa, Ozhiski, Nipigon and Pagwachuan ranges.</p> <p>Discuss availability of caribou in the Local Study Area and Regional Study Area through the seasons given the changes to habitat anticipated due to the project.</p> <p>Discuss, if possible, how the changes to caribou populations would change the presence of caribou along Attawapiskat River, around McFaulds Lake, along Muketei River, and within the Asheweig River, Ekwan, Winisk and Attawapiskat watersheds.</p>	<p>Anticipated effects of the project on the caribou populations in the Missisa, Ozhiski, Nipigon, and Pagwachuan ranges</p> <p>Similar to the WSR project, based on ECCC’s expert information and knowledge, there will likely be residual adverse effects to caribou and caribou habitat in terms of change in the distribution, and potentially a decrease in the abundance of caribou throughout the MFCAR project LSA. The northern portion of the LSA may be particularly affected since there is currently very little existing disturbance, whereas the southern portion of the LSA already has a higher level of disturbance which has negatively impacted the distribution and abundance of caribou in that area. In the south, the road will add to the cumulative disturbance in that area; however, in the north, the MFCAR is a new addition that will significantly increase the local disturbance levels. As well, similar to the WSR project, there will likely be a change in movement patterns across the RSA (Missisa, Ozhiski, Nipigon, and Pagwachuan ranges). This may result in a population level effect in terms of altering movement and migration patterns within and between ranges and seasonal habitats, as outlined in ECCC’s response to IAAC’s WSR caribou questions.</p> <p>The northern end of the MFCAR proposed corridor is heavily used by caribou as evidenced by the results of surveys presented in the final IS (Appendix M Ungulates), provincial caribou observations and collar data, and winter aerial surveys conducted during ECCC fecal DNA surveys. ECCC’s preliminary assessment indicates that the potential risk to caribou may be moderate to high based on the severity of potential effects, the importance of the habitat, the sensitivity of caribou, and the likelihood of effects.</p> <p>Please refer to ECCC’s response to IAAC’s WSR caribou questions as the potential pathways for the MFCAR project to affect the behaviour and distribution of caribou within the respective project RSAs are similar to those for WSR.</p> <p>Availability of caribou in the Local Study Area and Regional Study Area through the seasons</p> <p>Please see ECCC’s response to IAAC’s WSR caribou questions as similar impacts would be anticipated within the MFCAR LSA and RSA.</p> <p>In addition, ECCC concurs with the conclusion in the MFCAR impact statement (Appendix M PDF p333) that “...the addition of a new permanent road is predicted to result in alteration of caribou movement patterns and reduce the quality of caribou habitat by causing avoidance of the Construction Disturbance Area, particularly for caribou that move between the Missisa and Ozshiki ranges and Missisa and Nipigon ranges.”</p> <p>How the changes to caribou populations would change the presence of caribou within the specified areas</p> <p>Please see ECCC’s response to IAAC’s WSR caribou questions. As IAAC noted, these areas do not intersect with the MFCAR project footprint; however, the effects of the project on caribou may nonetheless adversely affect caribou presence in these areas. Collaring data shows that caribou move throughout the areas noted which overlap portions of the LSA and RSA for MFCAR, and caribou that use the project footprint area also use the specified watersheds.</p>

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4: ECCC, MECP	Given the linear corridor that would be created by the proposed road, are there any further changes in caribou distribution or displacement anticipated due to changes in predator-prey dynamics along the corridor?	Please see ECCC’s response to IAAC’s caribou questions for WSR as the projects would have similar impacts in this regard.
5: MECP	<p>In general, discuss mitigation measures that would be useful to ensure that the effects of the project on the caribou populations in the Missisa, Ozhiski, Nipigon and Pagwachuan ranges would be avoided or lessened. In your response, consider:</p> <ul style="list-style-type: none"> - the federal recovery strategy and action plan; - the mitigation measures proposed by the proponent; - measures that might be employed to minimize changes to predator-prey dynamics along the corridor; - if applicable, cumulative effects. 	
6: ECCC	For effects on federal lands (Marten Falls First Nation reserve), pursuant to subsection 73(3) of SARA, is there a permit that ECCC would need to issue?	Please see ECCC’s response to IAAC’s caribou questions for WSR as the SARA permitting considerations are similar between the two projects.
7: MECP	<p>Given the response to question 5 above and the possibly that road construction permits will be secured by Ontario Ministry of Transportation (MTO), are there any conditions of approval – or commitments under the <i>Species Conservation Act</i> – that are expected with respect to effects not on reserve lands?</p> <p>Is it MECP’s expectation that MTO would consult with Indigenous communities as part of its process?</p>	
Cumulative effects		
8: ECCC, MECP	Given the Marten Falls Community Access Road project, Webequie Supply Road project, Northern Road Link project and other reasonably foreseeable projects such as mining and infrastructure development within the Local Study Area and Regional Study Area, provide information on how the availability of caribou may be affected in the Missisa, Ozhiski, Nipigon and Pagwachuan ranges from a cumulative effects perspective.	<p>Please see ECCC’s response to IAAC’s caribou questions for WSR as the cumulative effects between the two projects are similar.</p> <p>In addition, ECCC concurs with the proponent that: <i>“Based on the weight of evidence, uncertainty in effects predictions and application of the precautionary approach, changes in habitat availability and distribution and survival and reproduction as a result of the Project and past, present and reasonably foreseeable developments could approach or extend beyond the resilience capabilities of one or more caribou population(s) overlapping the caribou effects assessment Regional Study Area. As a result, the combined residual cumulative effects from the Project and past, present and reasonably foreseeable developments on caribou and caribou habitat are determined to have a significant influence on self-sustaining and ecologically effective caribou populations in the caribou effects assessment Regional Study Area.”</i> [Appendix M PDF page 556; emphasis added]</p>