

Indigenous Services
CanadaServices aux
Autochtones Canada

July 24, 2026

Sent by email

Rachelle Beaulieu
Project Manager, Quebec Regional Office
Impact Assessment Agency of Canada | Government of Canada
rachelle.beaulieu@iaac-aeic.gc.ca / Tel. : 418-933-6174
cc: Sorel-Tracy@iaac-aeic.gc.ca

Dear Rachelle Beaulieu :

Re : Sorel-Tracy_Publication du rapport provisoire d'évaluation d'impact et des conditions potentielles

Thank you for the opportunity to review the draft Impact Assessment Report and Potential Conditions for the Sorel-Tracy Port Terminal Project, and for taking into account the contribution of Indigenous Services Canada (ISC) to date in the assessment.

In accordance with our mandate, ISC's review of the draft Impact Assessment Report focused on the characterization of potential federal effects of the proposed project as per section 2(f) of the *Impact Assessment Act* (2019), pertaining to non-negligible adverse changes to the health, social and economic conditions of Indigenous peoples. As requested, we analyzed the recommended mitigation measures and monitoring and follow-up programs. We also examined whether the draft Report accurately summarized the advice and comments that ISC provided to the Impact Assessment Agency of Canada (IAAC) throughout the process.

We acknowledge that the draft Report captured the concerns raised by the Indigenous groups consulted, including the W8banaki Nation, the Wendat Nation and the Mohawk Council of Kahnawà:ke (MCK), including the impacts that the project could have on the St. Lawrence River, wildlife and plant species of importance, access to the territory, practice of traditional activities, integrity of archaeological sites, land claims and the cumulative impacts of the project in the region.

ISC does not have additional feedback to provide on the Draft Report, as our previous comments were well integrated. However, ISC does have some feedback on the potential Conditions. As discussed in more detail in our comments below, we urge the proponent to provide opportunity and resources to interested First Nation communities to carry out their monitoring activities on land use, health and well-being. The Proponent's communication plan must also enable various community groups (especially women, girls and seniors) to safely access the territory to carry out their activities. Cultural safety training offered to employees will also prove to be very important in creating respectful environments, free of racism and adapted to the reality of First Nations.

Finally, the issue of cumulative effects in the St. Lawrence River region remains an important concern expressed by the surrounding Indigenous communities. As indicated in the draft Report, it is important to consider the project in a cumulative context of other major port projects in the St. Lawrence River. It is also important to consider the potential impacts of the project over a long period of time (80-100 years), including, but not limited to, paying particular attention to the anticipated effects of climate change on food security, traditional activities, and the rights of Indigenous peoples potentially affected by the project. The ongoing Regional Assessment could be an opportunity for the proponent of the Sorel-Tracy Port Terminal Project to work collaboratively with IAAC and concerned Indigenous groups in a way that sets a precedent for current and future development in the region.

Thank you for the opportunity to review the draft Report and potential Conditions. Please contact Yasmine Bector-Moghaddam, Environmental Management Officer and the Impact Assessment Coordinator, by email at yasmine.bector-moghaddam@sac-isc.gc.ca and cc: SAC.EvaluationImpacts-ImpactsAssessment.ISC@sac-isc.gc.ca for all questions.

Yours sincerely,

Original signed by:

Laura Mitchell,
Director General,
Lands and Environmental Management Branch
Lands and Economic Development Sector
Indigenous Services Canada

Table 1: Indigenous Services Canada comments on Potential Conditions for the Sorel-Tracy Port Terminal Project

No.	Section, page	Comment	Justification/context/references
ISC-01	2 Follow-up requirements (p.4-6)	<u>Monitoring activities led by First Nations</u> Indigenous Services Canada recommends that the proponent should provide interested First Nation communities with the opportunity and resources necessary to carry out or lead follow-up activities related to the potential effects of the project on their use of the territory, their health and well-being (e.g., surveys, sampling and analysis activities, interpretation and communication of results tailored to their communities). Monitoring criteria and thresholds that would trigger additional mitigation or compensation measures would also benefit from being defined in advance, and in consultation with the First Nation communities concerned. Providing the necessary resources to First Nation communities interested in carrying out their monitoring activities on land use, health and well-being should be included in the potential conditions document.	This advice is based on the importance of the connections between well-being, health and territory for First Nation communities, as well as the desire expressed by the W8banaki and Mohawk Nations to be able to actively participate in monitoring and follow-up activities. The draft Report states: "The First Nations reminded the proponent and IAAC of the importance to them of exercising stewardship and responsibility over the territory." (IAAC, 2026a, p.78), yet when Indigenous peoples are responsible for their health, their lands, and their waterways, this positively contributes to several of their determinants of health (Loppie, C., and Wien, F., 2022). Providing communities with the opportunity to actively participate in monitoring activities is also consistent with the right to own, use, develop and control their lands, territories and resources, as set out in the <i>United Nations Declaration on the Rights of Indigenous Peoples</i> (UN, 2018). It is particularly important that follow-up and surveillance activities contribute to minimize the concerns expressed by First Nation communities about potential contamination of country foods. Participation in harvesting and preparing fish and seashells positively contributes to their physical and mental health and to their food and cultural security. The consumption of these foods is very important, in addition to being a good source of nutrients, they help prevent several chronic diseases (Marushka, L. et al., 2021). It is important to remember that the prevalence rates of health problems affecting Indigenous peoples are still much higher than those of non-Indigenous populations (FNQLHSSC, 2018) and that mental wellness and food security are very important issues for First Nations. Any mitigation measures and follow-up activities that could help address health inequalities between Indigenous Peoples and the general population should therefore be considered.
ISC-02	6.1 Current use of lands and	<u>Cultural safety training</u>	In order to mitigate the residual adverse effects of the project on the natural and

	resources for traditional purposes, (p.13)	Indigenous Services Canada recommends that mandatory training developed and delivered by First Nations should focus on cultural safety (and not just intercultural awareness). This training should be offered to all employees (not just management) and should be offered on an ongoing basis (e.g., one time per year).	cultural heritage, IAAC intends to recommend that the proponent " provide terminal management personnel with the opportunity to participate in cultural safety training developed and delivered by an Indigenous group" (IAAC, 2026a, p. 50). However, condition 6.1 states that this would be an intercultural awareness training: "The Proponent shall provide mandatory intercultural awareness training to its management personnel, developed in consultation with Indigenous groups, and keep records of management participation in the training." (IAAC, 2026b, p. 13). Cultural safety and cross-cultural awareness are two distinct but complementary elements. Intercultural awareness training is generally intended to help employees learn more about the culture of First Nations communities. Cultural safety training goes far beyond that, it is intended to raise awareness of the power imbalances and discrimination experienced by First Nations, and to ensure that the environment is safe for First Nations. Their goal is to create respectful environments, free of racism and adapted to the reality of First Nations. Since cultural safety is a very important determinant of health for First Nations, any initiative to strengthen it directly contributes to reducing the health inequalities experienced by First Nations.
ISC-03	6.2 Current use of lands and resources for traditional purposes (p.13)	<u>Communication plan</u> Indigenous Services Canada recommends that the communication plan should be developed in consultation with Indigenous groups, as proposed in condition 6.2. This plan must minimize the potential effects of the project on the sense of security of the various Indigenous groups (especially women, children and elders) and facilitate their safe access to traditional places.	Safe access to traditional places and resources by different Indigenous groups (especially women, children and elders) is very important because it has the potential to influence the cultural safety and food security of communities, two very important determinants of health for First Nations.

References

Impact Assessment Agency of Canada (IAAC), 2026a. *Sorel-Tracy Port Terminal Project – Draft impact assessment report*. <https://iaac-aeic.gc.ca/050/evaluations/document/166886?culture=en-CA>

IAAC, 2026b. *Projet de terminal portuaire de Sorel-Trac Sorel-Tracy Port Terminal Project – Potential Conditions*. <https://iaac-aeic.gc.ca/050/evaluations/document/166887?culture=en-CA>

IAAC, 2023. *Indigenous Engagement and Partnership Plan - Sorel-Tracy Port Terminal Project*. <https://iaac-aeic.gc.ca/050/documents/p83969/147242F.pdf>

First Nations of Quebec and Labrador Health and Social Services Commission (FNQLHSSC), 2018. *RHS Report – Report of the Quebec First Nations Regional Health Survey – 2015*. https://cssspnql.com/en/produit/report-of-the-quebec-first-nations-regional-health-survey-2015/?_gl=1*1a6adz6*_up*MQ..*_ga*ODkwMjAyMzAyLjE3ODQ3NTA1MTM.*_ga_906VEPXQGV*cZ3ODQ3NTA1MTMkbzEkZzEkdDE3ODQ3NTA1NTEkajlyJGwwJGgw

Loppie, C., et Wien, F., 2022. *Understanding Indigenous health inequalities through a social determinants model*. National Collaborating Centre for Indigenous Health (NCCIH). <https://www.nccih.ca/495/Indigenous-health-inequalities-social-determinants.nccih?id=10373>

Marushka, L. et collab., 2021. *Importance of fish for food and nutrition security among First Nations in Canada*, Canadian Journal of Public Health (2021) 112 (Suppl 1):S64–S80, <https://pmc.ncbi.nlm.nih.gov/articles/PMC8239089/>

United Nations (UN), 2018. *United Nations Declaration on the Rights of Indigenous Peoples*. https://www.un.org/development/desa/indigenouspeoples/wp-content/uploads/sites/19/2018/11/UNDRIP_E_web.pdf