

Webequie Supply Road Project – Agency responses to comments received between December 19, 2019 and February 24, 2020

This summary table of comments includes comments received during the comment period on the draft Tailored Impact Statement Guidelines, the draft Cooperation Plan, the draft Indigenous Engagement and Partnership Plan, the draft Public Participation Plan and the draft Permitting Plan. Where substantial edits were made to any of the documents, the Agency has indicated as such in the Response to Comment column. Where edits were minor or editorial, the Agency’s response column focuses on highlighting for the commenter where in a document matters raised are presented for ease of reference and/or to clarify the Agency’s intent and expectations of the proponent.

#	Commenter	Comment Summary	Response to Comment
Accidents and Malfunctions			
1	Wildlife Conservation Society Canada	<p>Commented that worst-case scenarios need to be assessed for accidents and malfunction during migration periods, nesting and spawning periods, and sensitive seasonal periods for wildlife.</p> <p>Commented that malfunctions of culverts need to consider scenarios for freshwater and impacts on fish biodiversity, health, and movement.</p>	<p>Section 20 of the Tailored Impact Statement Guidelines require the proponent to assess accidents and malfunctions of the Project and includes requirements to consider plausible worst-case scenarios for each major incident type and the unmitigated effects of these scenarios.</p> <p>In Section 23.1 of the Tailored Impact Statement Guidelines, the proponent is required to consider best-practices during all phases of the Project, including taking into account migration, nesting, and spawning periods and sensitive seasonal periods for wildlife.</p>
2	Long Lake #58 First Nation	Commented that the proponent needs to consider the potential for increased traffic accidents as a result of the Project.	Section 23.1 of the Tailored Impact Statement Guidelines require the proponent to assess accidents and malfunctions of the Project as well as incidents involving road users, including a description of their role in the case of accidents and malfunctions such as spills, collisions, grounding or other accidents or malfunctions associated with the Project during all project phases.
3	Friends of the Attawapiskat River	Commented that there needs to be consideration of feedback from public consultation and historical flooding incidents when developing emergency response preparedness measures.	In Section 23.1 of the Tailored Impact Statement Guidelines, the proponent is required to include a description of efforts that will be taken to invite public feedback on emergency response plans. The Agency also notes that the proponent must consider exceptional natural events such as flooding when developing emergency response systems.
Acoustic Environment			
4	Health Canada	Commented on the potential for the Project to cause health effects related to noise from road construction and operation.	In Section 8.1 of the Tailored Impact Statement Guidelines the proponent is required to collect baseline ambient noise survey data at human receptor locations. Section 14.1 require the proponent to predict changes to the acoustic environment. Section 16.1 require the proponent to conduct an assessment of effects on human health with respect to biophysical determinants of health that takes into account effects from noise exposure on human health.

Alternative Means of Carrying Out the Project			
5	Neskantaga First Nation Wildlife Conservation Society Canada	Commented on the need to adequately assess the proposed route alternatives in the impact statement to provide clarity on project component locations and understand the ecological and social impacts of the route alternatives.	In Section 4.4 of the Tailored Impact Statement Guidelines, the proponent is required to consider the potential environmental, health, social and economic effects of alternative means of carrying out the Project that are technically and economically feasible.
6	Kitchenuhmaykoosib Inninuwug Municipality of Sioux Lookout Nibinamik First Nation Wildlife Conservation Society Canada	Commented on the need to assess all alternative means to carrying out the Project. Asked about the potential for a road connection to the public highway in Pickle Lake and if the provincial government has adequately considered this option to develop the Far North of Ontario.	
7	Webequie First Nation	Commented that in Section 4.4, alternatives assessment for electrical transmission lines can be removed from the scope. As indicated in the Detailed Project Description, how and when power and communications infrastructure will be extended into the project area has not been included in the scope of the Project.	The Detailed Project Description indicates that the road corridor could be used to accommodate transmission lines and broadband infrastructure in the future. Section 4.4 of the Tailored Impact Statement Guidelines requests that, in its alternative means analysis, in addition to the potential environmental, health, social and economic effects, the proponent must address all project elements, including, where relevant to the Project activities and design means, options for electrical transmission lines. The Agency has guidance available on its website: <u>Policy Context: Addressing "Need for", "Purpose of", "Alternatives to" and "Alternative means"</u> (available at https://www.canada.ca/en/impact-assessment-agency/services/policy-guidance/practitioners-guide-impact-assessment-act/need-for-purpose-of-alternatives-to-and-alternative-means.html) and <u>Guidance: "Need for", "Purpose of", "Alternatives to" and "Alternative means"</u> (available at https://www.canada.ca/en/impact-assessment-agency/services/policy-guidance/practitioners-guide-impact-assessment-act/guidance-need-for-purpose-of-alternatives-to-and-alternative-means.html).

Atmospheric Environment			
8	Attawapiskat First Nation Long Lake #58 First Nation Mushkegowuk Tribal Council Health Canada Webequie First Nation	<p>Commented on the need to adequately assess impacts of air quality on human health, wildlife and vegetation as a result of exhaust emissions.</p> <p>Commented that a monitoring program needs to be in place to ensure air quality throughout the life span of the Project.</p>	<p>In Section 8.1 of the Tailored Impact Statement Guidelines, the proponent is required to provide the results of a baseline survey of ambient air quality. Additions were made to Section 14.1 of the Tailored Impact Statement Guidelines requiring the proponent to provide a list of pollutant emitting sources including exhaust emissions from increased vehicular traffic during construction and operations. The proponent is also required to provide a quantitative assessment of common air pollutants and compare them with numerical standards and/or established air quality criteria [e.g. Canadian Ambient Air Quality Standards (CAAQS), or Ontario Ambient Air Quality Criteria (AAQC)].</p> <p>Sections 15.2, 15.3 and 15.4 of the Tailored Impact Statement Guidelines require the proponent to describe the impacts of air emissions and dust to various components of the biophysical environment including to birds and migratory birds, terrestrial wildlife and species at risk and their habitats.</p> <p>The Agency also notes that Section 16.1 of the Tailored Impact Statement Guidelines require the proponent to conduct an assessment of effects on human health with respect to biophysical determinants of health that takes into account changes in air quality. In addition, Section 26.1 of the Tailored Impact Statement Guidelines require the proponent to describe monitoring studies for air quality including a description of how the monitoring results will be used by the proponent's intervention mechanisms.</p>
9	Health Canada	Commented that radon gas emitted from road construction would be diffused into the air and have minimal impacts to human health.	Section 8.1 of the Tailored Impact Statement Guidelines has been revised to remove the requirement for the proponent to assess radon gas emitted from road construction.
Birds, Migratory Birds and their Habitat			
10	Aroland First Nation Attawapiskat First Nation Environment and Climate Change Canada Fort Albany First Nation Kasabonika Lake First Nation Member of public Wildlife Conservation Society Canada	<p>Commented on the need to adequately assess impacts to birds and bird habitat, including the utilization of best available resources and models, as well as, Indigenous knowledge.</p> <p>The following bird species have been identified as necessary to study: Whip-Poor-Will, Common Nighthawk, Canada Geese, Snow Geese, Swans, Gyrfalcons, Loons, and Peregrine Falcons.</p> <p>Ducks and geese were identified as important to Indigenous peoples' diets, especially in waterfowl habitats.</p>	<p>Section 8.9 of the Tailored Impacts Statement Guidelines requires the proponent to study the baseline conditions for birds, migratory birds and their habitat, including bird species of cultural importance to Indigenous communities. This includes the additions of Canada Goose, Snow Goose, Swans, Gyrfalcons, Loons, Peregrine Falcons and ducks that were identified as having Indigenous cultural importance. Section 15.2 requires the proponent to assess the Project's adverse effects on birds, migratory birds and their habitat. The information presented in the proponent's Impact Statement must be informed by Indigenous knowledge.</p> <p>During the impact statement phase, the Agency, in collaboration with federal authorities, will be pleased to discuss methodologies for the baseline and effects assessment studies.</p> <p>The Agency also notes that additional guidance regarding baseline information collection is identified in Appendix 1.</p>

Climate Change and Greenhouse Gas Emissions			
11	Attawapiskat First Nation Fort Albany First Nation LiUNA Indigenous Relations	Commented that the impacts of ongoing climate change, which includes the breakup of ice and opening up of habitat, needs to be considered to understand the need for the Project and impacts to wildlife.	<p>The Agency, by way of this document, will share your comment with the proponent for consideration in the assessment of the “need for” the Project.</p> <p>Section 14.3 of the Tailored Impact Statement Guidelines require the proponent to assess the release of mercury or methylmercury from disturbed soils and wetlands.</p> <p>Section 23.2 of the Tailored Impact Statement Guidelines require the proponent to identify the Project's vulnerabilities to changes in climate, describe climate resilience of the Project and how climate change effects have been incorporated into project design and planning over the lifetime of the Project - including the addition of break-up season as a consideration.</p> <p>Section 25 requires the proponent to provide a description of the Project's contributions to sustainability.</p>
12	Aroland First Nation Attawapiskat First Nation Environment and Climate Change Canada Friends of the Attawapiskat River Fort Albany First Nation Mushkegowuk Tribal Council Wildlife Conservation Society Canada	Commented that the Tailored Impact Statement Guidelines need to inform the proponent to adequately assess the impacts to peatlands and muskegs, which are critical carbon sinks in Northern Ontario. The proponent should use the best available resources, including Indigenous knowledge.	Section 14.3 of the Tailored Impact Statement Guidelines require the proponent to assess changes resulting from the Project to riparian, wetland and terrestrial environments. The Agency notes that Section 15.5 of the Tailored Impact Statement Guidelines require the proponent to assess the Project's effects on climate change, including the effects arising from increased greenhouse gases emissions and a qualitative description of effects on carbon sinks from removal and alteration of wetlands.

Country Foods			
13	Eabametoong First Nation Ginoogaming First Nation Kasabonika First Nation Kitchenuhmaykoosib Inninuwug Member of public Health Canada Neskantaga First Nation Weenusk First Nation Webequie First Nation	<p>Commented that country foods, such as caribou, fish, moose, geese, blueberries, and raspberries, need to be assessed to understand the impacts to harvesting, hunting, Indigenous peoples' health, and Indigenous peoples' rights.</p> <p>The timing of baseline data collection is important to have an adequate understanding of the impacts to country foods.</p>	<p>Sections 8, 9 and 12.2 of the Tailored Impact Statement Guidelines require that the proponent study baseline conditions of the quality and quantity of country foods. Through engagement with Indigenous groups, at a minimum those identified in the Indigenous Engagement and Partnership Plan, the proponent is required to identify the species, quantities, frequency, harvesting locations and report how the data was collected for country foods in the Impact Statement. Section 8.7 includes the addition of species identified to the Agency as having cultural importance.</p> <p>The Agency also notes that Sections 15.1, 15.3, 15.4 of the Tailored Impact Statement Guidelines require that the proponent assess effects of the Project to species of cultural importance, and that Section 19 requires the proponent to assess how the project could impact resources available for harvesting (including quality, quantity and access to the resources).</p>
Cumulative effects			
14	Neskantaga First Nation	<p>Asked how cumulative effects will be analyzed taking into context local perspectives, knowledge, and future development goals of Indigenous groups.</p> <p>Asked if there would be an opportunity to assess cumulative impacts at a regional and strategic level.</p>	<p>Section 22 of the Tailored Impact Statement Guidelines require the proponent to carry out a cumulative effects assessment. Past, present and reasonably foreseeable projects, such as additional roads and mining related activities, need to be included in the assessment.</p> <p>On February 10, 2020, the Minister determined that a regional assessment of the Ring of Fire area will be conducted pursuant to the <i>Impact Assessment Act</i>.</p>

15	Aroland First Nation Attawapiskat First Nation Eabametoong First Nation Fort Albany First Nation Friends of the Attawapiskat River Kasabonika Lake First Nation Ginoogaming First Nation Long Lake #58 First Nation Marten Falls First Nation Members of the public Ministry of Energy, Northern Development and Mines Mushkegowuk Tribal Council Natural Resources Canada Neskantaga First Nation Nibinamik First Nation Noront Resources Wildlife Conservation Society Canada Wildlands League	Commented that the cumulative effects Section of the Tailored Impact Statement Guidelines needs to be expanded to better capture proposed developments in the Ring of Fire area including mineral development and future infrastructure.	Section 22 of the Tailored Impact Statement Guidelines require the proponent to carry out a cumulative effects assessment. Past, present and reasonably foreseeable projects, such as additional roads and mining related activities, need to be included in the assessment. The Agency has made edits to Section 22 to be more explicit in the expectations of what should be included in the cumulative effects assessment. On February 10, 2020, the Minister determined that a regional assessment of the Ring of Fire area will be conducted pursuant to the <i>Impact Assessment Act</i> .
16	Aroland First Nation Attawapiskat First Nation Eabametoong First Nation Fort Albany First Nation Kasabonika Lake First Nation Long Lake #58 First Nation Neskantaga First Nation Wildlife Conservation Society Canada	Commented that the proponent needs to assess the cumulative impacts on the exercise of rights and interests of Indigenous peoples, as well as, effects on valued components due to all project components. This should be clearly described and made clear to Indigenous groups.	Section 22 of the Tailored Impact Statement Guidelines require that the proponent's cumulative effects assessment include consideration of cumulative effects to rights of Indigenous peoples and cultures, for all potentially impacted groups including those located in the areas which will be impacted by increased access to the region by exploration and mineral development projects. Both the content and means of presenting this information is to be developed in consultation with each potentially impacted Indigenous group..
Decommissioning and Abandonment			
17	Transport Canada	Provided comments regarding decommissioning of cross over navigable waterways.	Section 3.2.3 of the Tailored Impact Statement Guidelines require the proponent to clearly state under what circumstances decommissioning would occur, and describe the suspension, abandonment or decommissioning for water crossings.
18	Mushkegowuk Tribal Council	Commented that decommissioning of the Project should be considered.	The Agency notes that Section 3.2.3 requires the proponent to describe the abandonment and decommissioning phase, including suspension. If the proponent does not anticipate decommissioning and abandonment, it must state clearly under what circumstances decommissioning would occur, and demonstrate a commitment to following environmental and social best practice in all its activities.

Drinking Water			
19	Health Canada	Commented on available resources that are appropriate for the screening and risk assessment of drinking water contaminants.	Section 16.1 of the Tailored Impact Statement Guidelines require the proponent to predict effects of the Project on the quality and quantity of ground or surface water used for domestic uses based on the most stringent guidelines of the following criteria: Canadian Drinking Water Quality Guidelines, Ontario Drinking Water Quality Guidelines, and the Ontario Soil Groundwater and Sediment Standards
20	Fort Albany First Nation Ginoogaming First Nation Kasabonika Lake First Nation Weenusk First Nation	Commented on the potential for water contamination as a result of the Project. Albany River was identified as a drinking water source.	<p>Section 14.2 of the Tailored Impact Statement Guidelines require the proponent to assess any changes to groundwater and surface water, including at existing or future drinking water wells and spring water sources.</p> <p>Section 16 requires the proponent to assess the effects to human health, including contamination of drinking water.</p> <p>Section 23.1 requires the proponent to identify any critical infrastructure such as local drinking water treatment plants or facilities that may treat water sources impacted by the Project, and the capacity of the drinking water treatment plant or facilities to treat water sources impacted by an accidental release from the Project during all project phases.</p>
Economic Factors –General			
21	Member of public	Commented on a tendency to solely consider economic value for certain environmental components, such as fish.	Section 15 of the Tailored Impact Statement Guidelines require the proponent to assess the effects of the Project on environmental valued components. Interconnections between environmental valued components and social, health and economic valued components and interactions between effects must also be described.
22	Aroland First Nation Federal Economic Development Initiative for Northern Ontario	Commented that future infrastructure and telecommunications need to be considered under economic impacts.	Section 18.4 requires the proponent to describe whether the Project will result in, or facilitate the construction of, other infrastructure (such as railways, airports, power plants, transmission lines, pipelines, dams, water mains, sewage lines, etc.).

23	Federal Economic Development Initiative for Northern Ontario Neskantaga First Nation Member of public Ministry of Heritage, Sport, Tourism, and Culture Industries	Commented that a community specific and local economic baseline should be established to understand the private sector activities taking place and the income from government expenditures. The effects assessment should consider potential price fluctuation of goods and local businesses that could be impacted. The province may have available resources of baseline data. Other sources are census data from Statistics Canada and community profile data from Indigenous Services Canada.	The Tailored Impact Statement Guidelines require the proponent to consider changes to economic conditions due to the Project and the positive and negative consequences of those changes. Section 11 requires the proponent to consider economic baseline conditions. Section 18 notes that all interconnections between economic valued components and other valued components and interactions between effects must also be described and that economic effects might extend over a larger geographic area than most other effects. In addition, Section 18.6 requires the proponent to describe effects of the Project, including consistency with, on existing local or regional plans for economic development. The Agency also notes that Appendix 1 contains references to potential data sources for the conduct of baseline studies.
24	Aroland First Nation Member of public Employment and Social Development Canada Ginoogaming First Nation Member of public Ministry of Heritage, Sport, Tourism, and Culture Industries	Commented that the Project has the potential to be economically beneficial due job creation, increased small businesses, increased access to services. Commented that the Project could increase economic activity in the project area, such as forestry from clear cutting and aggregate resource extraction. Requested that these aspects be included in the Tailored Impact Statement Guidelines.	
25	Employment and Social Development Canada Member of public Nibinamik First Nation	Commented that there will be a need for programs for Indigenous peoples, local businesses and workforce, to benefit from economic opportunities, such as job training and health supports. Commented that the proponent connect with the Kiikenomaga Kikenjigewen Employment and Training Services and the Indigenous Skills and Employment Training Program, and other federal services to understand the job training opportunities available and identify individuals who have already received training.	Section 3 of the Tailored Impact Statement Guidelines require the proponent to describe the anticipated labour requirements, employee programs and policies, and workforce development opportunities for all phases of the Project. An addition to Section 10 requires the proponent to provide information on apprenticeships and training initiatives (e.g. Kiikenomaga Kikenjigewen Employment and Training Services, Mushkegowuk Council Employment and Training Services, Northern Ontario Internship Program) as potential data sources for the conduct of baseline social studies. Sections 17 and 18 require the proponent to describe any training or education employment opportunities. Section 19.1 encourages the proponent to use the Northern Ontario Network of delivery organizations funded by the Indigenous Skills and Employment Training (ISET) Program. Section 20 requires the proponent to describe education, training, and hiring practices intended to maximize the employment of local and Indigenous people during all phases of the Project.

26	Attawapiskat First Nation Federal Economic Development Initiative for Northern Ontario Member of the public Mushkegowuk Tribal Council Neskantaga First Nation Weenusk First Nation	Commented that the proponent should be able to demonstrate the capacity to carry out construction and operation of the Project from an economic and human resource perspective.	An addition to Section 2 of the Tailored Impact Statement Guidelines require the proponent to identify the secured or anticipated financial means to carry out all project phases and the proponent's organizational structure. In addition, Section 3 requires the proponent to describe the workforce requirements including the anticipated labour requirements, employee programs and policies, and workforce development opportunities for all phases of the Project.
Effects of the Environment on the Project			
27	Friends of the Attawapiskat River Kasabonika Lake First Nation Wildlife Conservation Society Canada	Commented that fires, acid rain, flooding, insect infestations, spring break up, and seasonal freeze/thaw patterns should be considered.	Section 8.6 of the Tailored Impact Statement Guidelines require the proponent to provide timing of freeze/thaw cycles, ice cover and ice conditions for surface water bodies in the project area. An addition to Section 8.7 requires the proponent to describe the natural disturbance regime (e.g. fire, floods, droughts). An addition to Section 15.3 requires the proponent to describe changes to insects, in particular pollinating species. Section 14.3 requires the proponent to describe any changes in risk to forest fires that may result from the Project. The Agency also notes that Section 23.2 requires the proponent to describe potential effects of the environment on the Project.
Federal and Provincial Permits			
28	Fisheries and Oceans Canada Environment and Climate Change Canada Natural Resources Canada Transport Canada	Provided comments to the Agency regarding the Permitting Plan.	The Agency has incorporated updated information from federal authorities in the finalization of the Permitting Plan.
29	Aroland First Nation Eabametoong First Nation Fort Albany First Nation Kasabonika Lake First Nation Long Lake #58 First Nation Member of public Mushkegowuk Tribal Council Weenusk First Nation	Requested information on the permits and regulatory decisions required for the Project. Commented on issues with the Province of Ontario's consultation, permitting process and policies in Northern Ontario, including the <i>Far North Act</i> . Commented on the consultation process for the draft Terms of Reference under the province of Ontario.	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). Further information on federal permits is included in the Permitting Plan. Further detail regarding federal permits and authorizations that may be required for the Project are 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. The Agency will share comments regarding the provincial Terms of Reference with the Ontario Ministry of the Environment, Conservation and Parks.

Fish and Fish Habitat			
30	Fisheries and Oceans Canada	Commented on the importance of timing when assessing fish and fish habitat in baseline studies, as well as, provided freshwater and fish terminology for the Tailored Impact Statement Guidelines.	<p>Section 8.8 of the Tailored Impact Statement Guidelines require the proponent to study the baseline conditions related to fish and fish habitat.</p> <p>Section 15.1 requires the proponent to assess the positive and adverse effects to fish and fish habitat, including seasonal and annual trends in abundance, sensitive habitats and temporal scales.</p>
31	Aroland First Nation Attawapiskat First Nation Fort Albany First Nation Kasabonika Lake First Nation Long Lake #58 First Nation Marten Falls First Nation Member of the public Mushkegowuk Tribal Council Nibinamik First Nation Wildlife Conservation Society Canada	<p>Commented that there could be negative impacts to fish and fish habitat as a result of the Project, due to habitat disruption, water contamination, road crossings, increased fishing from tourism, changes in water flow, and quantity, and compounded problems with existing fish diseases.</p> <p>Particular fish of concern include Pike, White Fish, Sturgeon, Walleye, Brook Trout, Northern Pike, Pickerel, and Lake Whitefish.</p> <p>There should also be consideration of past and current commercial fishing and relevant fisheries management zones.</p>	<p>Section 8.8 of the Tailored Impact Statement Guidelines requires the proponent to study the baseline conditions. Species of interest have been added to Section 8.8.</p> <p>Section 15.1 requires the proponent to assess the positive and adverse effects to fish and fish habitat, including spawning grounds.</p> <p>Consideration of existing conditions of and potential effects on commercial fisheries are included in Sections 8, 11 and 19.</p>
32	Neskantaga First Nation Weenusk First Nation	<p>Commented that there could be community based studies and maps that could be made available.</p> <p>Weenusk commented that the community is collecting baseline information on fish and fish habitat.</p>	<p>The Agency encourages your community to share any information that could inform the effects assessment with the proponent and the Agency.</p> <p>The Agency notes that Section 7.2 of the Tailored Impact Statement Guidelines highlights potential sources of baseline information including community based monitoring and studies conducted by Indigenous groups (e.g., monitoring of Lake Sturgeon conducted by Weenusk First Nation).</p>
Follow-up and Monitoring Programs			
33	Aroland First Nation Attawapiskat First Nation Health Canada Kasabonika Lake First Nation Mushkegowuk Tribal Council Wildlife Conservation Society Canada	Commented that follow-up and monitoring programs will need to incorporate timely submission of monitoring reports, information on how monitoring results will be used, and Indigenous membership and participation. Commented on the need for capacity funding to support monitoring of environmental, health, social, and economic conditions during the post-decision phase.	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. An addition to Section 26 requires the proponent to present an outline of the assessment including a description on how the methodologies were informed by community and Indigenous knowledge and prepare monitoring reports (number, timing, content, frequency, format, funding, duration, geographic extent).

34	Webequie First Nation	Commented that Webequie First Nation is interested in collaboration and co-development with regards to environmental monitoring.	The proponent is encouraged to take the necessary approach to environmental monitoring, including partnerships with other Indigenous groups, industry, other levels of government, academia or non-government organizations. If environmental monitoring is intended to be undertaken in a collaborative manner, but is necessary to support the follow-up program for the Project in relation to verification of assessment predictions or effectiveness of mitigation measures, the proponent should ensure that stipulations around making the data available to the Agency are clear in the Impact Statement. Considerations regarding follow-up programs are provided in Section 26 of the Tailored Impact Statement Guidelines.
Food Security			
35	Indigenous Services Canada-First Nations and Inuit Health Indigenous Services Canada-Lands and Economic Development	Commented that Section 9 of the Tailored Impact Statement Guidelines should include text on availability of quality food, as well as describe food security and food sovereignty.	Additions to Section 9 require the proponent to provide a baseline health profile which includes a description of the status of food security and food sovereignty with regard to Indigenous groups and local communities.
Funding Programs			
36	Aroland First Nation Eabametoong First Nation Fort Albany First Nation Friends of the Attawapiskat River Attawapiskat First Nation Long Lake #58 First Nation	<p>Asked if the Agency supports Indigenous-led studies, impact assessment training, and Indigenous participation in technical advisory groups. Commented that Independent technical assistance is required for Indigenous groups to adequately participate.</p> <p>Commented that the communities are interested in conducting studies on traditional territory and would like to collaborate with other First Nation communities. Such studies may also require support from the Agency and the proponent.</p> <p>Requested an effects assessment workshop with the Agency, the proponent, and Indigenous groups. This would also allow for an opportunity to co-write impact assessment products for the Project.</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. The Agency encourages Indigenous groups to indicate interest in participating in technical discussions, as outlined in Section 6 of the Tailored Impact Statement Guidelines, as early as possible. The Agency does not fund independent Indigenous-led studies or assessments, but does consider such studies or assessments if provided to the Agency for consideration. The Agency does not fund impact assessment training, but provides training. To inquire about training opportunities, Indigenous groups are invited to contact the training coordinator at ceaa.training-formation.acee@canada.ca .
37	Eabametoong First Nation Long Lake #58 First Nation Neskantaga First Nation	Asked if the proponent would be providing funding to support Indigenous groups to provide information including on valued components and Indigenous knowledge.	<p>The Agency will pass on the comment to the proponent by way of this document. The proponent must provide Indigenous groups with opportunities to: provide Indigenous knowledge during baseline data collection; comment on the list of valued components and indicators; inform the effects assessment and review its conclusions; and, inform the development of mitigation measures and follow-up programs.</p> <p>The Agency provides financial assistance to potentially impacted Indigenous groups to support participation in Agency-led activities during an impact assessment.</p>

38	Aroland First Nation Eabametoong First Nation Fort Albany First Nation Long Lake #58 First Nation Neskantaga First Nation Weenusk First Nation	Commented on the need to provide adequate funding to ensure First Nation groups are able to participate fully in the impact assessment process. This includes ensuring the uses of funding are clear and allocated in a timely manner.	The Agency provides limited financial assistance to potentially impacted Indigenous groups to support participation in Agency-led activities during an impact assessment. The Agency's Participant Funding Program is designed to help Indigenous groups 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, and honoraria and ceremonial costs. During the impact statement phase, potentially impacted Indigenous groups will be invited to apply for funding to support participation in the remainder of the impact assessment process.
General Assessment Type			
39	Long Lake #58 First Nation	Asked if an impact assessment would be required for the Project.	On November 29, 2019, the Agency decided that a federal impact assessment is required for the Project. The reasons for the Agency's determination are found on the Registry.
40	Long Lake #58 First Nation Neskantaga First Nation	Asked questions about the review panel process and what would trigger a review panel.	In accordance with section 36 of the <i>Impact Assessment Act</i> , the Minister of Environment and Climate Change, within 45 days after the day on which the Notice of Commencement was posted on the Registry, may refer a project to a review panel, if in the public interest to do so. The Notice of Commencement for the Project was issued on February 24, 2020.
41	Neskantaga First Nation	Commented that it appears Ontario is both the funder and the regulator of the Project and is using a project by project approach to avoid a fulsome federal impact assessment and regional assessment approach.	The Agency will share the comment regarding the province's approach with the proponent and the Ontario Ministry of Environment, Conservation and Parks and the Ontario Ministry of Energy, Northern Development and Mines. On February 10, 2020, the Minister of Environment and Climate Change determined that a regional assessment of the Ring of Fire area will be conducted pursuant to the <i>Impact Assessment Act</i> . The headquarters office of the Impact Assessment Agency of Canada will work with the Province of Ontario, Indigenous groups, federal authorities, non-government organizations and the public to determine the appropriate activities, outcomes and boundaries of the regional assessment. Further information can be found on the Canadian Impact Assessment Registry at: https://iaac-aeic.gc.ca/050/evaluations/proj/80468?culture=en-CA

General Project Description			
42	<p>Aroland First Nation Attawapiskat First Nation Eabametoong First Nation Fort Albany First Nation Members of the public Ginoogaming First Nation Long Lake #58 First Nation Marten Falls First Nation Ministry of Energy, Northern Development and Mines Municipality of Sioux Lookout Mushkegowuk Tribal Council Neskantaga First Nation Nibinamik First Nation Noront Resources Wildlife Conservation Society Canada Webequie First Nation Weenusk First Nation</p>	<p>Commented that the Tailored Impact Statement Guidelines need to ensure that the proponent is able to clearly describe the Project. This includes, the Project location and design, aggregate pit locations and decommissioning plans, who would be the operator of the Project, how the proponent intends to fund operations of the Project, construction timelines, connections to other road access, the classification of the road, how and if restrictions would be put in place on the road, such as tolls, if other infrastructure would be incorporated into the project right of way, the need for the Project, size of the bridges, mapping of project components, anticipated road use during operations, and the overlap with mining claims.</p>	<p>Section 3 of the Tailored Impact Statement Guidelines require the proponent to provide an overview of the Project and an updated Project Description, including project components, project activities and workforce requirements. Section 3.1 requires the proponent to include the geographic location of project components including borrow pits, gravel or aggregate pits and water crossings. Section 3.2 requires the proponent to describe the construction, operation and decommissioning phases of the Project, and the anticipated road use during the operations phase (including traffic volume). Additions have been made to Section 3 to clarify the requirements of the proponent.</p> <p>In addition, Section 2.1 requires the proponent to identify the secured or anticipated financial means to carry out all project phases. Section 3.2 requires the proponent to identify the ownership of the Project during different phases, and the potential transfer and control of the different project components. Section 17.1 requires the proponent to describe the predicted effects of the Project on services and infrastructure in the study area.</p>
General Support for the Project			
43	<p>Eabametoong First Nation Fort Albany First Nation Ginoogaming First Nation Kasabonika Lake First Nation Kitchenuhmaykoosib Inninuwug LiUNA Indigenous Relations Long Lake #58 First Nation Member of public Webequie First Nation</p>	<p>Commented support for the Indigenous group to build infrastructure that is beneficial to the communities.</p>	<p>The Agency notes this comment. As noted in Section 1.1 of the Tailored Impact Statement Guidelines, the assessment considers positive and negative consequences of changes to the environment, or to social, health and economic conditions that are likely to be caused by the Project, including the result of any interaction between those effects.</p>

Geology, Geochemistry and Geological Hazards			
44	Ministry of Energy, Northern Development and Mines	Commented that including the description of the structural geology, known mineral occurrences and any data from exploration diamond drilling and any other type of mechanized drilling will provide information for a more detailed geological assessment. Commented that more emphasis needs to be placed on mine hazards and geologic hazards due to impacts on human health and the environment.	Additions to Section 8.3 of the Tailored Impact Statement Guidelines require the proponent to describe known geological hazards in the project area. Section 23.2 requires the proponent to identify effects of the Project on the environment, including geologic hazards. Section 8.3 also requires the proponent to describe the bedrock geology and lithological units.
Groundwater Quality and Quantity			
45	Wildlife Conservation Society Canada	Commented that potential contaminants to groundwater assessed should include additional parameters, including arsenic, chromium, and mercury.	Additions have been made to Sections 14, 15 and 16 of the Tailored Impact Statement Guidelines that require the proponent to describe effects of the Project on contaminants of concern (e.g. arsenic, chromium and mercury) in groundwater, wetland environments, fish and fish habitat and human health.
46	Fort Albany First Nation	Expressed concern about underground water systems.	Section 14.2 of the Tailored Impact Statement Guidelines require the proponent to assess the effects of the Project on groundwater quantity and quality.
Human Health and Well-Being			
47	Long Lake #58 First Nation	Commented that communities do not automatically improve with highway access.	The Agency notes this comment. Sections 16, 17, 18 and 19 of the Tailored Impact Statement Guidelines require that the assessment take into account changes to the environment or to health, social or economic conditions and the positive and negative consequences of those changes to the conditions of communities. Section 19 requires the proponent to identify the adverse and positive effects of the Project to Indigenous Peoples and impacts on the exercise of Aboriginal and Treaty rights.
48	Health Canada Health Canada-Public Health Agency of Canada	Commented that terminology and concepts needed to be clarified on Sections of the Tailored Impact Statement Guidelines that relate to Human Health Risk Assessment and impacts to human health.	Section 9 and 16 have been updated to include terminology and concepts provided by federal authorities.
49	Webequie First Nation Mushkegowuk Tribal Council	Commented that the Project could have a positive impact on Webequie First Nation's community well-being.	Section 16 of the Tailored Impact Statement Guidelines require the proponent to assess positive and adverse effects of the project on health, including mental health and well-being and substance use. Section 19 requires the proponent to assess potential changes to health, social or economic conditions and the positive and negative consequences of those changes to Indigenous peoples.

Indigenous Consultation			
50	Neskantaga First Nation	<p>Asked about the dispute resolution process between Indigenous groups and the proponent during the Impact Assessment.</p> <p>Wants to see collaboration with neighbouring Matawa Nations in order to build consensus and develop dispute resolutions. Asked if this would be possible.</p>	<p>Section 12 of the Tailored Impact Statement Guidelines require that the proponent engage with potentially impacted Indigenous groups. The Agency does not prescribe any particular dispute resolution process to the proponent. The Agency encourages Indigenous groups to work bilaterally with the proponent to identify mutually agreeable mechanisms for dispute resolution early in your relationship.</p>
51	Aroland First Nation Eabametoong First Nation Ginoogaming First Nation Long Lake #58 First Nation Marten Falls First Nation Member of the public Webequie First Nation	<p>Commented that the Agency's consultation material is not helpful at facilitating participation by Indigenous groups. Communities need better resources to engage their community members and encourage participation at the community level.</p>	<p>The Agency notes the comment and will continue to improve material so as to enable meaningful participation. During the planning phase, the intent of the products were to support understanding of the impact assessment process, solicit views on valued components of importance to Indigenous groups, and understand how Indigenous groups wished the Agency to consult with them during the remainder of the impact assessment process. The Agency welcomes specific feedback on how best to support participation by Indigenous groups.</p>
52	Kasabonika Lake First Nation	<p>Commented that the impact assessment process is not just about discussing issues, but also about addressing issues. There is a desire for community members to participate in this project.</p>	<p>The Agency anticipates that specific issues of concern to Indigenous groups participating in the process would be addressed during the preparation of the proponent's Impact Statement. Where issues remain, the Agency will be able to follow-up during its review and consultation with Indigenous groups during the impact statement phase.</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 annexes to the Indigenous Engagement and Partnership Plan may also be developed to identify additional opportunities for participation or consultation during the impact assessment.</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>

53	Eabametoong First Nation Ginoogaming First Nation Neskantaga First Nation	Asked about the process for assessing impacts on the exercise of rights with the Agency.	An overview of the Agency's current approach to the assessment of impacts on the exercise of rights can be found on the Agency's Practitioner's Guide to the Impact Assessment Act, which can be found in the Agency's Website (https://www.canada.ca/en/impact-assessment-agency/services/policy-guidance/practitioners-guide-impact-assessment-act/interim-guidance-assessment-potential-impacts-rights-Indigenous-peoples.html). Please see the Agency's <i>Interim Guidance: Assessment of Potential impacts on the Rights of Indigenous Peoples</i> .
54	Aroland First Nation Neskantaga First Nation	Asked about the role of a tribal council in the impact assessment process.	The Agency's owes a duty to consult to individual Indigenous groups whose members are the rights holders, if there is a potential for the Project to impact on the exercise of rights of that particular Indigenous group. If a First Nation chooses to have a Tribal Council, supported by a band council resolution, represent the First Nation's rights and interests, the Agency would consult with the Tribal Council, but as a practice would continue to inform the First Nation at key milestones and copy the First Nation on all correspondence. In such cases, it is the Agency's expectation that the proxy holding Tribal Council would make efforts to engage the individual community members of the First Nation to ensure that input provided to the Agency is informed. The Agency has included Tribal Councils in the Public Participation Plan for the Project.
55	Eabametoong First Nation	Asked for clarification on the use of the term "Indigenous groups".	Indigenous group refers to a community or people that holds rights recognized and affirmed by section 35 of the <i>Constitution Act, 1982</i> . For this project, the Agency has identified, as indicated in the Indigenous Engagement and Partnership Plan, various Indigenous groups, or First Nation communities, for consultation during the impact assessment process.
56	Ginoogaming First Nation Kasabonika Lake First Nation Weenusk First Nation	Asked for clarity on the role of First Nation communities in the impact assessment process and how Indigenous groups can meaningfully contribute to the impact assessment process.	The Agency integrates Crown consultation throughout the impact assessment process. For this project, the Agency has identified, as indicated in the Indigenous Engagement and Partnership Plan, various tools and activities, such as meetings, teleconferences, plain-language documents, documents translated into Indigenous languages and technical discussions, to support understanding of potential effects of the Project and to enable meaningful participation. For additional information on the roles of Indigenous groups in impact assessment, please see the Agency's <i>Interim Guidance: Indigenous Participation in Impact Assessment</i> available in the Agency's Practitioners Guide online: https://www.canada.ca/en/impact-assessment-agency/services/policy-guidance/practitioners-guide-impact-assessment-act/interim-guidance-Indigenous-participation-ia.html

57	Marten Falls First Nation Neskantaga First Nation Webequie First Nation	Asked for clarity regarding the role of the proponent and the role of the Agency in conducting both Indigenous consultation and engagement, as well, as public engagement. Asked for information on recording proponent engagement with Indigenous groups.	<p>The proponent is required to engage with potentially impacted Indigenous groups in the development of the proponent's Impact Statement. In addition to the requirements set out in Sections 6.1, 6.2 and 6.3 of the Tailored Impact Statement Guidelines, the proponent must provide Indigenous groups with an opportunity to: provide Indigenous knowledge during baseline data collection; comment on the list of valued components and indicators; inform the effects assessment and review its conclusions; and inform the development of mitigation measures and follow-up programs.</p> <p>The proponent must engage with the public and provide timely notification of proposed engagement activities to seek community knowledge and views on: baseline conditions; valued components and indicators, taking into consideration the requirements under Section 25 of the Tailored Impact Statement Guidelines; effects assessment and the assessment of the Project's contribution to sustainability; mitigation and follow-up measures; and conclusions.</p> <p>In addition to its own engagement activities, the proponent is expected to participate meaningfully in engagement activities outlined in the Public Participation Plan, and Indigenous Engagement and Partnership Plan, when requested to do so by the Agency. The Impact Statement must include a record of engagement by the proponent and must include all engagement activities undertaken prior to the submission of the Impact Statement during the planning phase and in the preparation of the Impact Statement. The requirements are described in Sections 5.2 and 6.3 of the Tailored Impact Statement Guidelines.</p> <p>With the public, the Agency's consultation approach is outlined in the Public Participation Plan. With Indigenous groups, the Agency will continue to lead federal Crown consultation for the Project as the impact assessment continues and will do so in accordance with the activities outlined in the Indigenous Engagement and Partnership Plan. Of note, the Agency will validate the proponent's information provided in the Impact Statement with Indigenous groups, including verifying that potential impacts on the exercise of rights have been appropriately characterized and offer to work with Indigenous groups on the conclusions regarding the assessment of potential impacts on the exercise of rights when developing the Agency's Impact Assessment Report during the impact assessment phase.</p>
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58	<p>Aroland First Nation Attawapiskat First Nation Fort Albany First Nation Neskantaga First Nation Weenusk First Nation</p>	<p>Asked for more information regarding opportunities available to Indigenous groups for project oversight or to participate in joint decision-making regarding project design.</p> <p>Asked whether Indigenous groups can be partners in the impact assessment process</p> <p>Asked whether Indigenous groups may provide Indigenous knowledge, articles, reports, and studies to the Agency to consider in the impact assessment process.</p> <p>Commented that Indigenous groups should be able to inform the thresholds that are used to guide the assessment of project effects.</p>	<p>The proponent has been provided direction in Section 6 of the Tailored Impact Statement to work with Indigenous groups during the preparation of the Impact Statement. During those engagement activities, potential impacted Indigenous groups, are encouraged to engage meaningfully to provide advice on the design of the project, including alternatives assessment, location of project components, and potential impacts on the exercise of rights, when requested to do so by the proponent. An important aspect of impact assessment is the identification of mitigation and follow-up program measures. Such discussions can help inform the proponent's selection of appropriate thresholds to use in the effects assessment. The proponent has been provided direction to seek the views of Indigenous groups in their selection and during those discussions, potentially impacted Indigenous groups are requested to share other information such express interests in participation in monitoring. In accordance with the Indigenous Engagement and Partnership Plan, the Agency will validate whether the proponent has appropriately characterized the views of potentially impacted Indigenous groups, and where necessary, follow-up with the proponent.</p> <p>The Agency is of the view that potentially impacted Indigenous groups are an important participant in the impact assessment process and should be provided meaningful opportunities to discuss the potential impacts on the exercise of their rights due to the Project. The Indigenous Engagement and Partnership Plan outlines the roles and responsibilities of the Agency and potentially impacted Indigenous groups. Indigenous groups are encouraged to provide information on traditional uses, sites to be avoided and even other reports and studies that might help better design the project as early in the process, preferably the planning phase, but if not in the impact statement phase, to the proponent and Agency, specifying any considerations regarding confidentiality. The Tailored Impact Statement Guidelines describes the roles and responsibilities of the proponent. In combination, these documents are instructive to facilitate a process where each participant has meaningful opportunities to provide information and participate in the development of impact assessment documents to inform the decision-maker.</p>
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59	<p>Attawapiskat First Nation Aroland First Nation Eabametoong First Nation Fort Albany First Nation Friends of the Attawapiskat River Indigenous Services Canada- Lands and Economic Development Kasabonika Lake First Nation Long Lake #58 First Nation Marten Falls First Nation Members of public Nibinamik First Nation Weenusk First Nation Neskantaga First Nation Webequie First Nation</p>	<p>Comments on the Indigenous Engagement and Partnership Plan, including that the use community posters, mail outs, and social media to engage community members. Requested printed material of documents due to poor internet connection and requested accessible and timely information. Asked how Indigenous groups can develop a community-specific annex to the Indigenous Engagement and Partnership Plan with the Agency.</p> <p>Commented on the need for clear delineation between the Crown’s duties and the proponent’s engagement duties, recognition for the efforts required to engage the remote communities in the area, appropriate planning of community visits, capacity to undertake Indigenous knowledge studies and technical support. Commented on coordination between the two road projects as Indigenous groups are being consulted on multiple projects. Commented that while meetings are beneficial, there should be consideration of resources of Indigenous groups and should only occur when there could be greatest benefit to avoid consultation fatigue, simple project update meetings, where possible, should be coordinated by the proponent and Agency. Requested opportunities to meet with the government review team.</p> <p>Commented that planning for meetings with Indigenous groups should consider the needs of diverse groups within the community (e.g. elders, youth, women); as well as scheduling to suit the Indigenous groups; and that meetings should occur during all phases of the Project. Commented that translation and other logistical accommodation are necessary to ensure community members can actively participate in consultation and engagement activities.</p>	<p>The Indigenous Engagement and Partnership Plan outlines opportunities and methods for meaningful Agency-led engagement and consultation with potentially affected Indigenous groups throughout the federal impact assessment process, including where Indigenous communities are seeking collaboration and partnership.</p> <p>The Agency's Indigenous Engagement and Partnership Plan includes a list of consultation tools and methods to engage community members, including technical meetings where the Agency plans to invite government review teams as well as translation into Indigenous languages and plain language summaries. The Agency has reviewed comments received on the Indigenous Engagement and Partnership Plan and made updates where appropriate. The Agency will be pleased to work with potentially impacted Indigenous groups on a community-specific annex to the Indigenous Engagement and Partnership Plan to specify additional community-specific interests, including activities such co-development of the assessment of potential impacts on the exercise of rights of that community as well as types of meetings and appropriate participants to include (e.g elders, youth, women). The Agency will be pleased to ensure that all material is also mailed in hardcopy to potentially impacted Indigenous groups and encourages the proponent to do the same.</p> <p>The Agency's planned consultation activities are outlined in the Indigenous Engagement and Partnership Plan, which was finalized with input from potentially impacted Indigenous groups. The Agency will request that the proponent also share its planned engagement activities with potentially impacted Indigenous groups and the Agency. The role of the proponent in engagement is outlined in Section 6 of the Tailored Impact Statement Guidelines. Any coordination of activities between different proponents is up to the proponents to contemplate. While the Agency does not manage the timelines of when proponents may submit key documents to the Agency, the Agency will keep in mind the request for coordination and do so when it is able. In relation to capacity, the Agency provides limited funding through its Participant Funding Program.</p>
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60	Eabametoong First Nation	Asked how Indigenous groups will be supported to provide information to the Agency. Noted need for funding for Indigenous knowledge studies and to gather information on local valued components. Questioned how involvement in the impact assessment processes would be supported.	<p>Agency provides limited funding through its Participant Funding Program. The program is designed to help Indigenous groups 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>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>
61	Neskantaga First Nation	Asked how land use and occupancy information would be collected, synthesized, and analyzed for Indigenous groups affected by the Project.	Section 12.2 of the Tailored Impact Statement Guidelines require the proponent to include information on the current use of lands and resources for traditional purposes, including historical use. Sections 6, 7 and 12 require the proponent to engage with Indigenous groups during the baseline data collection and effects assessment studies, including opportunities to provide Indigenous knowledge to inform baseline collection and effects assessments. Potential sources of baseline data are outlined in Section 7.2 and include, amongst other sources, Indigenous knowledge, community base monitoring, and studies conducted by Indigenous groups.
62	Neskantaga First Nation	Asked how the Agency conducts meaningful consultation in a way that is culturally-safe and recognizes ongoing crises, community-specific consultation protocols and decision-making processes.	<p>The Agency has developed guidance that is available on the Agency's website on meaningful consultation and collaboration with Indigenous groups (links provided below). With regard to culturally-safe and crisis aware consultation practices, the Agency looks to Indigenous groups to share their views and requirements. The Agency will continue to seek community views throughout the assessment process within the confines of the <i>Impact Assessment Act</i> and the <i>Information and Management of Time Limits Regulations</i>.</p> <p>Interim Guidance: Indigenous Participation in Impact Assessment available in the Agency's Practitioners Guide: https://www.canada.ca/en/impact-assessment-agency/services/policy-guidance/practitioners-guide-impact-assessment-act/interim-guidance-Indigenous-participation-ia.html.</p> <p>Interim Guidance: Collaboration with Indigenous peoples in impact Assessments: https://www.canada.ca/en/impact-assessment-agency/services/policy-guidance/practitioners-guide-impact-assessment-act/collaboration-Indigenous-peoples-ia.html</p>

63	<p>Aroland First Nation Attawapiskat First Nation Eabametoong First Nation Environment and Climate Change Canada Fort Albany First Nation Ginoogaming First Nation Kasabonika Lake First Nation Long Lake #58 First Nation Marten Falls First Nation Neskantaga First Nation Webequie First Nation Weenusk First Nation Wildlife Conservation Society Canada</p>	<p>Asked if the Agency will be sending Indigenous communities the baseline studies and maps being developed by the proponent. Commented that the proponent should not be collecting baseline data without engaging First Nation communities first. Commented that Indigenous groups should be engaged early. Sending letter notices is not sufficient to be engaged.</p> <p>Commented that Indigenous groups should be provided with information on studies that are taking place in their territory and provided with an opportunity to review that information.</p> <p>Commented that the proponent's data-collection efforts for the Project should consider mutual benefits of the potentially impacted Indigenous groups and that the proponent should provide opportunities to co-plan or co-lead data collection.</p>	<p>The Agency will share the views about notification and co-planning regarding baseline work with the proponent.</p> <p>Section 6 of the Tailored Impact Statement Guidelines indicates that the proponent must engage with impacted Indigenous groups, and must provide them with opportunity to provide Indigenous knowledge during baseline data collection, comment on the list of valued components and indicators, inform the effects assessment and review its conclusions, and inform the development of mitigation measures and follow-up programs.</p>
64	Eabametoong First Nation	<p>Asked whether the Agency has plans to evaluate whether objectives identified in the <i>Indigenous Engagement and Partnership Plan</i> have accomplished at each stage of the impact assessment.</p>	<p>While the Agency had not specifically contemplated this matter, it would be open to further discussions with Eabametoong First Nation.</p>
65	<p>Fort Albany First Nation Long Lake #58 First Nation Neskantaga First Nation Nibinamik First Nation</p>	<p>Asked whether the Tailored Impact Statement Guidelines can be amended after the planning phase. Commented that the community have input after the planning phase is complete.</p>	<p>The Tailored Impact Statement Guidelines are not intended to be amended so as to provide certainty to the proponent on what matters to contemplate during the preparation of the Impact Statement. However, the Agency recognizes that Indigenous groups may have new information as studies are undertaken and further discussions are held within communities, and as such has included requirements for the proponent to validate the selection of valued components and indicators with potentially impacted Indigenous groups.</p>
66	Long Lake #58 First Nation	<p>Commented that the Project will have positive and negative impacts on all Matawa First Nations.</p>	<p>The Agency notes the comment. The Agency is has identified Indigenous groups for consultation in the Indigenous Engagement and Partnership Plan.</p>
67	Neskantaga First Nation	<p>Commented on the importance of allowing consultants and advisors to represent Indigenous groups at meetings to avoid conflicts.</p>	<p>Indigenous groups are invited to identify to the Agency any person or entity (including consultancies and or technical experts hired by the community) who are authorized to share information and coordinate consultation activities on behalf of the Indigenous group with the Agency.</p>

68	Aroland First Nation Eabametoong First Nation Kasabonika Lake First Nation Kitchenuhmaykoosib Inninuwug Long Lake #58 First Nation Nibinamik First Nation Neskantaga First Nation Webequie First Nation	Commented on the need to follow the principles and protocols for consultation and engagement established by Indigenous groups. Commented that the proponent needs to be engaging with Indigenous groups to ensure adequate community participation to discuss impacts, mitigation measures, and benefits. This needs to take place with each Indigenous group with their own protocols and memorandums of understanding being established to promote a two-way dialogue.	The Agency reviews consultation protocols that are provided by Indigenous groups in order to inform consultation conduct with Indigenous groups. This information has been used to inform the Agency's Indigenous Engagement and Partnership Plan to the extent possible. Community-specific annexes to the Indigenous Engagement and Partnership Plan may also be developed to identify additional opportunities for participation or consultation during the impact assessment. The Agency encourages Indigenous groups provide information on protocols and preferences to the proponent and make sure that engagement preferences are clarified to support the proponent's engagement activities as outlined in Section 6 and elsewhere in the Tailored Impact Statement Guidelines.
69	Kasabonika Lake First Nation Member of public	Commented that in-community meetings need to be advertised to all community members so everyone can participate and is aware when the Agency comes to conduct consultation.	The Agency will endeavour to provide material to meeting organizers within the community and provide advance notice of community visits by the Agency. With Indigenous groups, the Agency relies on community leadership to pass on the information to community members.
70	Eabametoong First Nation Friends of the Attawapiskat River	Commented that Indigenous community members are also located in major cities in Northern Ontario. This needs to be accounted for when planning community meetings.	The Agency has identified Thunder Bay and Geraldton, in Ontario, as locations for community information sessions and community meetings during formal comment periods. The Agency also held Webexes for participants not present in those venues to receive the same information and discuss issues with the Agency. The Agency welcomes recommendations for other in-person information sessions and community meetings in the future. The Agency also makes key documents available at viewing centres in Thunder Bay, Geraldton, Nakina, Timmins, Sioux Lookout and Pickle Lake during comment periods. The Agency maintains an online Registry and is available for contact by email during formal comment period and in general during the entire impact assessment process.
71	Attawapiskat First Nation Eabametoong First Nation Webequie First Nation	Commented that Indigenous groups should be responsible for assessing impacts on the exercise of Aboriginal and Treaty rights due to the Project. This should not be analyzed solely by the proponent.	Section 19 of the Tailored Impact Statement Guidelines require the proponent to provide an opportunity for Indigenous groups potentially impacted by the Project to review the information, on the potential impacts on the exercise of rights, prior to submission of the Impact Statement. In addition, further to the Indigenous Engagement and Partnership Plan, which includes a list of consultation tools and methods to engage community members, the Agency will be pleased to work with potentially impacted Indigenous groups on a community-specific annex to the Indigenous Engagement and Partnership Plan to specify additional community-specific interests, including activities such co-development of the assessment of potential impacts on the exercise of rights of that community.
72	Long Lake #58 First Nation	Commented that the community has not been consulted by the provincial government.	Comments regarding provincial environmental assessment process will be shared with the Province of Ontario.

73	Aroland First Nation Eabametoong First Nation Fort Albany First Nation Friends of the Attawapiskat River Kasabonika Lake First Nation Long Lake #58 First Nation Mushkegowuk Tribal Council Neskantaga First Nation Nibinamik First Nation Weenusk First Nation	Commented that the timelines for submitting comments are often unfeasible for First Nation communities. This has limited the ability for Indigenous groups to participate and contribute to the planning phase for the Project. The Agency needs to consider the internal processes that Indigenous groups must follow and the frequency of emergencies that require immediate attention of leadership.	The Agency appreciates the participation in the planning phase and notes that the 180-day planning phase time limit is legislated. The Agency accepts comments at any time during the impact assessment process and works to ensure that all issues are addressed and comments inform the development of products. In addition, Indigenous groups have the opportunity to influence the impact assessment process through the provision of input to the proponent in the development of its Impact Statement. The Tailored Impact Statement Guidelines contain a number of requirements for the proponent to engage with Indigenous groups to inform the Impact Statement.
74	Aroland First Nation Fort Albany First Nation Neskantaga First Nation	Commented that the United Nations Declaration on the Rights of Indigenous Peoples needs to be incorporated into the Agency's Crown consultation conduct. Asked what would happen if the community did not give consent for the Project. Asked about meetings with the Minister of Environment and Climate Change or opportunities to appeal decisions made pursuant to the <i>Impact Assessment Act</i> .	The Government of Canada is committed to renewing the relationship with Indigenous peoples based on the recognition of rights, respect, cooperation and partnership. The Government of Canada is also committed to fully implement the United Nations Declaration on the Rights of Indigenous Peoples in the Canadian context, as reaffirmed in the preamble of the <i>Impact Assessment Act</i> . Through the Indigenous Engagement and Partnership Plan, the Agency supports the Government's commitment to advancing reconciliation with Indigenous groups. The Agency will share views expressed, including the reasons for the views in relation to potential impacts on the exercise of rights with the Minister to support his decision-making. When requested, the Minister takes meetings, but may sometimes delegate such requests to Agency officials. Other than providing for an appeal of a review officer decision under section 138, the <i>Impact Assessment Act</i> does not specify opportunities to appeal decisions made under the Act. In some circumstances, decisions made under the Act may be challenged by way of an application for judicial review to the federal court.
75	Friends of the Attawapiskat River Member of public	Commented that there is interest from community members in the Attawapiskat watershed to be consulted.	The Agency has been actively consulting with the leadership of Indigenous groups potentially impacted by the Project as listed in the Indigenous Engagement and Partnership Plan. The Agency encourages community members to work with their community leadership to submit their comments. Alternatively, the Agency accepts comments from the public through the Canadian Impact Assessment Registry Internet site, in-person public information sessions, and public WebEx sessions.
76	Long Lake #58 First Nation	Commented that web based video conferencing might be better options to communicate.	The Agency's Indigenous Engagement and Partnership Plan includes a list of consultation tools and methods to engage community members (including the potential use of translators/interpreters and teleconference/webex).

77	Attawapiskat First Nation	Expressed apprehension regarding the Tailored Impact Statement Guideline's expectation that the proponent characterize effects based on the level of concern raised by impacted communities.	The Agency expects the proponent to make reasonable efforts to seek input and where necessary provide information to assist the participation of potentially Impacted Indigenous groups in the impact assessment process. The Agency is open to further discussions with Attawapiskat First Nation as well to validate the information provided by the proponent in the Impact Statement.
78	Eabametoong First Nation	Proposed a multi-lateral working group on road governance options in order to minimize harmful impacts and identify management strategies and policy considerations and/or accommodations required to promote net benefits through road usage.	Section 3.2.2 of the Tailored Impact Statement Guidelines require the proponent to provide a description of any road access controls, including but not limited to: access to and use of adjacent lands for traditional uses or other activities (e.g., mineral exploration, outfitters, etc.); vehicle and operator licensing requirements; insurance coverage requirements and general liability; and enforcement/policing responsibility.
79	Aroland First Nation Attawapiskat First Nation Ginoogaming First Nation Kasabonika Lake First Nation Kitchenuhmaykoosib Inninuwug Neskantaga First Nation Nibinamik First Nation Weenusk First Nation	Requested an in-community meeting with the proponent.	The Agency will share the request with the proponent.
80	Attawapiskat First Nation	Requested consultation on all federal authorizations that will be required for the Project.	The Permitting Plan outlines the permits, licenses and authorizations (regulatory instruments) that may be required for the Project should the Minister of the Environment and Climate Change issue a decision statement to the proponent with enforceable conditions to allow the project to proceed. This includes information on consultation related to specific permits.

81	Aroland First Nation Friends of the Attawapiskat River Member of public Nibinamik First Nation	Requested information on which Indigenous groups are included in the Crown's list and which Indigenous groups have been engaged by the proponent. Requested information regarding what comments other Indigenous groups have raised regarding the Project. Requested that the Agency publish comments received alongside a reason of how they factored into decision-making.	<p>The Indigenous Engagement and Partnership Plan identifies all Indigenous groups that have been included in the Crown's list to date in Section 4 of the document. This document is available to assist the proponent in further developing or refining their engagement strategy and supporting ongoing trust and relationship-building.</p> <p>The Agency posts all comments received from Indigenous groups, the public, and federal experts on the Canadian Impact Assessment Registry Internet site for the Project. These comments are available to all Indigenous groups to access online.</p> <p>From time to time the Agency will prepare a summary table of comments with Agency responses and share the summary table of comments with all Indigenous groups and the proponent. The version of the summary table of comments with comments up to December 19, 2019 is shared on the Registry as an attachment to the letter dated December 19, 2020 from the Agency to the proponent. This summary table of comments for comments received during the comment period on the draft Tailored Impact Statement Guidelines and draft plans is on the Registry as an attachment to the letter to the proponent dated February 24, 2020.</p>
82	Aroland First Nation Fort Albany First Nation Ginoogaming First Nation Webequie First Nation	Requested that the Agency conduct capacity-building initiatives at the beginning of each phase to enable Indigenous groups to understand the impact assessment process before providing comments. This capacity-building initiative should include a lessons learned opportunity to support materials and processes sensitive to the needs of Indigenous peoples.	In the Indigenous Engagement and Partnership Plan the Agency commits to offer capacity-building activities and discussions on technical matters (including community meetings, and teleconferences). Indigenous groups interested in receiving additional training regarding the <i>Impact Assessment Act</i> can find further information here: https://www.iaac-aeic.gc.ca/014/index-eng.aspx and may inquire about targeted training opportunities by writing to this email: ceaa.training-formation.acee@canada.ca .
83	Aroland First Nation Neskantaga First Nation	Will the Agency enter into confidentiality/ information sharing agreements with Indigenous groups to ensure confidential Indigenous knowledge is adequately protected?	<p>Please note that any information submitted to the Agency to inform the effects assessment will be made publicly available as part of the project file, and may be posted online the Registry subject to certain exceptions related to privacy, security or confidentiality. The Agency's Submission Policy (https://iaac-aeic.gc.ca/050/evaluations/participation/conditions) determines which submitted information can be shared publicly, and what should remain private. For further information on how we protect your privacy, please refer to the Privacy Notice (https://www.iaac-aeic.gc.ca/050/evaluations/protection?culture=en-CA).</p> <p>Should you wish to provide any comments or documents that contain confidential or sensitive information that you believe should be protected from release to the public, please contact the Agency before submitting the information. Information marked as confidential will not be accepted without prior contact made with the Agency.</p>

Indigenous knowledge			
84	Neskantaga First Nation	<p>Asked how the proponent would collect Indigenous knowledge from the Indigenous group while protecting confidential and sensitive information.</p> <p>Asked how the province of Ontario would be involved with cultural heritage impact assessment and managing information on sacred places and burial sites.</p>	<p>The Tailored Impact Statement Guidelines require the proponent to work with Indigenous communities and gather Indigenous knowledge to inform the impact assessment. An addition to Section 6.2 requires the proponent to respect confidential and sensitive information by establishing confidentiality agreements with any Indigenous group that shares confidential information to inform the impact assessment. Sections 12.1 and 19.1 require the proponent to include information on physical and cultural heritage of Indigenous groups. The Agency will collaborate with the Government of Ontario on the assessment of effects on physical and cultural heritage in accordance with Table 1 of the Cooperation Plan for the Project.</p>
85	Fort Albany First Nation Long Lake #58 First Nation	<p>Commented that Indigenous knowledge needs to be recognized in the way information is collected and analyzed. Indigenous knowledge is often transmitted orally and is not separated into rigid categories like health, economic, social, environmental, and rights.</p>	<p>The Tailored Impact Statement Guidelines, including in Sections 6 and 7, highlight the need for Indigenous knowledge to be incorporated into the assessment, including while preparing baseline studies and the effects assessment. The Agency expects the proponent to engage with potentially impacted Indigenous groups to verify how Indigenous knowledge should be gathered from each community, including respect for traditions such as verbal transmission of knowledge.</p>
Indigenous Peoples Current Use of Lands and Resources for Traditional Purposes			
86	Aroland First Nation Eabametoong First Nation Fort Albany First Nation Ginoogaming First Nation Indigenous Services Canada- Lands and Economic Development Kasabonika Lake First Nation Kitchenuhmaykoosib Inninuwug Members of the Public Marten Falls First Nation Mushkegowuk Tribal Council Ministry of Heritage, Sport, Tourism, and Culture Industries Neskantaga First Nation Nibinamik First Nation Webequie First Nation Wildlife Conservation Society Canada	<p>Commented that the Project and future development activities in the Ring of Fire area have the potential to impact 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, including as a result of the Project, future development activities in the Ring of Fire area, and outsider access to traditional territories.</p> <p>Areas that have been identified as important for traditional practices include: Ozhiski Lake, Pym Island, Attawapiskat River, Albany River, Winisk River, McFauld's Lake and the Muketei River.</p>	<p>Sections 6 and 12 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 the current use of lands and resources for traditional purposes by Indigenous peoples, including current and historical practices (e.g. hunting, fishing, trapping, gathering of plants or medicines, ceremonial or spiritual practices, passing on of Indigenous knowledge or language) and areas of traditional practices.</p> <p>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.).</p>

Indigenous Peoples' Economic Conditions			
87	Aroland First Nation Attawapiskat First Nation Fort Albany First Nation Indigenous Services Canada- Lands and Economic Development Kitchenuhmaykoosib Inninuwug Neskantaga First Nation Marten Falls First Nation Wildlife Conservation Society Canada	Commented that Indigenous peoples' traditional economies need to be appropriately understood through consultation and engagement. This includes the relationship to food prices and harvesting and hunting, inter- and intra-community trade, and the cumulative effects of existing environmental disturbances in northern Ontario. This will provide a better analysis of the economic impacts to Indigenous groups.	Additions have been made to Sections 11, 18 and 19 of the Tailored Impact Statement Guidelines that require the proponent to describe the baseline conditions and to assess potential positive and negative effects on social, health and economic conditions of Indigenous peoples, including effects on traditional economies, labour market, housing and consumer prices, business environment, infrastructure, public finances, and overall economic impact. Section 22 requires the proponent to assess the potential cumulative effects of the Project. The Tailored Impact Statement Guidelines also 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 incorporate Indigenous knowledge into the effects assessment presented in the Impact Statement.
88	Aroland First Nation Ginoogaming First Nation LiUNA Indigenous Relations Member of public Webequie First Nation	Commented that there could be economic benefits to the proponent community but the community will need to be prepared for the potential. Commented that there are potential economic benefits for the proponent community of gaining access to the provincial highway network in the future.	
89	Aroland First Nation Long Lake #58 First Nation	Commented that there will be compounded economic benefits as a result of mining in the Geraldton area and mining activity in the Ring of Fire Area. This should be studied by the proponent.	Section 22 of the Tailored Impact Statement Guidelines require the proponent to assess the potential cumulative effects of the Project, including on economic conditions.
90	Aroland First Nation Eabametoong First Nation Fort Albany First Nation Kasabonika Lake First Nation Kitchenuhmaykoosib Inninuwug LiUNA Indigenous Relations Long Lake #58 First Nation Member of public Neskantaga First Nation Wildlife Conservation Society Canada Weenusk First Nation	Concerned about the ability of Indigenous groups to gain positively from economic opportunities as a result of the Project. Indigenous groups would like to understand how their community members could benefit from opportunities and what training initiatives will be supported by the proponent and federal departments. There is also interest in understanding the measures that will be put in place to protect Indigenous workers from experiencing discrimination.	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. The Tailored Impact Statement Guidelines direct the proponent to consider and describe the use of existing programs such as the Indigenous Skills and Employment Training (ISET) Program. The ISET Program is funded by the Government of Canada, through Employment and Social Development Canada. Employment and Social Development Canada's ISET Program is delivered through a vast network including the Kiikenomaga Kekenjigewen Employment and Training Services (KKETS) (www.kkets.ca). Along with the ISET Program agreement, KKETS also has an agreement under the Employment and Social Development Canada's Skills and Partnership Fund (SPF), with supports projects focusing on mining and construction sectors. The Agency also directed the proponent to Mushkegowuk Council Employment and Training Services, which like KKETS, is funded through ISET.

Indigenous Peoples' Health Conditions			
91	Neskantaga First Nation	Asked how metal levels in country foods would be determined and studied as they relate to impacts on health.	Section 16 of the Tailored Impact Statement Guidelines require the proponent to conduct an assessment of effects on human health with respect to biophysical determinants of health that takes into account potential changes to current and future availability of country foods (including contamination and quality of country foods).
92	Ginoogaming First Nation Kasabonika Lake First Nation Indigenous Services Canada- Lands and Economic Development Neskantaga First Nation	Asked how the proponent anticipates positive health impacts as a result of the Project. There are concerns about newcomers bringing in drugs and alcohol to dry communities and negatively impacting community mental health and safety. Resources will be required to adequately cope with the migration and interaction of non-Indigenous people with Indigenous peoples.	Sections 16 and 19 of the Tailored Impact Statement Guidelines require the proponent to assess changes to health, social and economic conditions due to the Project, including mental health and well-being, and substance use. These changes could result in positive or negative consequences. Edits have been made to Sections 9,10, 16, 17 and 18 to better capture effects related to mental health and well-being, safety and substance use.
93	Neskantaga First Nation	Asked how the proponent will study baseline conditions for well-being and apply mitigation measures.	Sections 9 and 20 of the Tailored Impact Statement Guidelines require the proponent to collect baseline information on human health, including physical, mental and social well-being, and directs the proponent to identify mitigation measures for human health and well-being. The information presented in the proponent's Impact Statement must be informed by Indigenous knowledge. Section 7 requires the proponent, for each of the valued components that will be assessed in the Impact Statement, to create a study plan that should be informed by Indigenous groups.
94	Health Canada Indigenous Services Canada – Lands and Economic Development Indigenous Services Canada-First Nations and Inuit Health	Commented there are resources available on healthy eating guidance for First Nation communities, Indigenous community health profiles and resources for identifying inequities.	The Agency has incorporated advice from federal authorities, provincial government, the public and Indigenous groups regarding sources of information to support the preparation of the Impact Statement throughout the Tailored Impact Statement Guidelines. Relevant resources have also been added to Appendix 1 of the Tailored Impact Statement Guidelines.

95	Fort Albany First Nation Friends of the Attawapiskat River Wildlife Conservation Society Canada	Requested mercury and hazardous contaminants on human health be taken into account in the Human Health Risk Assessment. Requested that intergenerational trauma, suicide, and addictions be analyzed.	<p>Section 16 of the Tailored Impact Statement Guidelines require the proponent to provide a detailed Health Impact Assessment. Section 16.1, requires the proponent to conduct a problem formulation exercise/preliminary model predictions to determine whether a Human Health Risk Assessment is required. The proponent must provide a rationale/explanation if problem formulation/preliminary model predictions indicate that a Human Health Risk Assessment is not warranted. If a Human Health Risk Assessment is required, the assessment must identify all potential contaminant exposure pathways for contaminants of concern to adequately characterize potential biophysical risks to human health. A multimedia Human Health Risk Assessment may need to be considered and conducted for any contaminant of potential concern with an identified risk and multiple pathways, including mercury.</p> <p>Section 7 requires the proponent, for each of the valued components that will be assessed in the Impact Statement, to create a study plan that should be informed by Indigenous groups.</p> <p>Additions to Section 9 and 10 indicates that the proponent should consider intergenerational trauma, mental health and substance use as part of their baseline studies. Section 16.2 requires the proponent to assess the Project's effect on the social determinants of health, including alcohol and drug use, and psychological factors.</p>
Indigenous Peoples Rights			
96	Neskantaga First Nation	Asked if the temporal and spatial boundaries for baseline data collection include past, present, and planned future rights and interests.	Section 7.4 provides direction to the proponent in determining the temporal and spatial boundaries for each valued component. In addition, the proponent is required to engage with Indigenous groups when defining spatial and temporal boundaries for valued components.

97	<p>Aroland First Nation Eabametoong First Nation Fort Albany First Nation Ginoogaming First Nation Neskantaga First Nation Webequie First Nation Marten Falls First Nation Weenusk First Nation Wildlife Conservation Society Canada</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. Requested that the assessment consider access and use of land and resources, land claims, the historical context of colonialism and government approved development in the area, and Indigenous language.</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>.</p> <p>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 the exercise of rights (including due to effects on valued components) and include appropriate mitigation and follow-up program measures. The proponent should turn its mine to suitable accommodation measures, such as avoidance of important areas, timing of construction activities, notification or participation in follow-up programs, proposed to address potential impacts on the exercise of rights. The Impact Statement must also document each Indigenous group's views on the effects, impacts and mitigation and follow-up program measures.</p>
98	<p>Eabametoong First Nation Fort Albany First Nation Member of the public Neskantaga First Nation</p>	<p>Commented that Indigenous groups are being excluded from the decision-making process. The Project does not represent the government-to-government relationship between the Crown and First Nations. First Nations do not want to see a repeat of historical colonial practices and divisions amongst First Nations.</p>	<p>The Agency will continue to consult Indigenous groups to understand any impacts on the exercise of rights of Indigenous peoples as protected under section 35 of the <i>Constitution Act, 1982</i>.</p> <p>With regard to the proponent, 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 rights and work with potentially impacted Indigenous groups on development mitigation and follow-up program measures to address any potential impacts. The proponent's Impact Statement must also document each Indigenous group's views on the effects, impacts on the exercise of rights, and measures to address potential effects or impacts. The Agency will validate the content of the Impact Statement with Indigenous groups prior to deeming the Impact Statement as satisfactory.</p>

99	Fort Albany First Nation	Commented that participation in the impact assessment process does not indicate consent to the Project or acceptance that the process is legally adequate.	<p>The Government of Canada is committed to renewing the relationship with Indigenous peoples based on the recognition of rights, respect, cooperation and partnership. Through implementation of the Indigenous Engagement and Partnership Plan, the Agency will gather and share views expressed, including the reasons for the views in relation to potential impacts on the exercise of rights with the Minister to support his decision-making.</p> <p>Section 19 of the Tailored Impact Statement Guidelines require the proponent to engage with each Indigenous group potentially impacted by the Project. The proponent's Impact Statement must also document each Indigenous group's views on the effects, impacts on the exercise of rights, and measures to address any potential effects or impacts.</p>
Indigenous Peoples' Social Conditions			
100	Aroland First Nation Eabametoong First Nation Fort Albany First Nation Kasabonika Lake First Nation LiUNA Indigenous Relations Wildlife Conservation Society Canada Weenusk First Nation Webequie First Nation	Commented on the importance of having a fulsome understanding of an Indigenous group's social and economic community context so that social and economic effects of the Project, including their interactions, can be fully contemplated. Highlighted the importance of engagement by the proponent to adequately understand the historical and current context of Indigenous groups. Some groups may already have community-based research that can be shared with the proponent.	<p>Section 6 of the Tailored Impact Statement Guidelines identifies requirements for the proponent's engagement with Indigenous groups.</p> <p>Sections 12 and 19 require the proponent to engage with Indigenous groups in assessing baseline conditions, and the effects of the Project on social, economic and health conditions of Indigenous peoples.</p>
101	Aroland First Nation Ginoogaming First Nation Kasabonika Lake First Nation Neskantaga First Nation	<p>Commented that Indigenous groups are experiencing social crisis, such as suicides, drug and alcohol abuse, and familial breakdowns.</p> <p>Commented on the inter-connected relationship of First Nation communities in Northern Ontario. The Project has the potential change these relationships, First Nations do not want to see relationships amongst communities damaged.</p>	Edits were made to Sections 16, 17 and 19.1 of the Tailored Impact Statement Guidelines require the proponent to study the changes to health and social conditions, including assessing the positive and negative consequences of those changes, including on community well-being, drug and alcohol use and suicide.
102	Ginoogaming First Nation LiUNA Indigenous Relations Long Lake #58 First Nation Member of public	<p>Commented that there are positive benefits to having access to the provincial highway network, such as access to health care and education, better housing and reduced cost of goods, as well as, better communication amongst Indigenous communities.</p> <p>Commented that there could be pressures on existing social infrastructure in the region, such as hospitals.</p>	Edits were made to Sections 16, 17, 18 and 19 of the Tailored Impact Statement Guidelines that require the proponent to study the changes to health, social and economic conditions due to the Project, including the positive and negative consequences of those changes. Those changes could be matters related to access to health care, education, housing and consumer prices, and social infrastructure.

103	Health Canada-Public Health Agency of Canada Indigenous Services Canada-First Nations and Inuit Health Indigenous Services Canada-Lands and Economic Development	Provided potential resources and sources of information for Indigenous peoples social conditions and edits to the Tailored Impact Statement Guideline Sections on social conditions.	The Agency has incorporated advice from federal authorities, provincial government, the public and Indigenous groups regarding sources of information to support the preparation of the Impact Statement throughout the Tailored Impact Statement Guidelines. Relevant resources have also been added to Appendix 1 of the Tailored Impact Statement Guidelines.
Indigenous Physical and Cultural Heritage			
104	Aroland First Nation Eabametoong First Nation Fort Albany First Nation Friends of the Attawapiskat River Ginoogaming First Nation Kasabonika First Nation Marten Falls First Nation Neskantaga First Nation Nibinamik First Nation Wildlife Conservation Society Canada Webequie First Nation	<p>Commented on impacts to cultural heritage and archaeological resources of Indigenous groups, such as burial sites and locations used for the purpose of teaching.</p> <p>Commented on negative consequences to Indigenous ways of life, knowledge and language due to the Project. Commented the need to engage Indigenous groups to identify what is culturally important to them and understand potential project induced changes. Cautioned that information provided by communities should not be misrepresented by the proponent or the Agency.</p> <p>Noted burial sites, teaching sites and sacred sites in the areas of the Ogoki River crossing, the Albany River and near Noront's Esker Camp. Noted that there are lakes and aquatic plants used for medicinal purposes.</p>	<p>Section 12.1 of the Tailored Impact Statement Guidelines require the proponent to describe the historical baseline conditions associated with Indigenous physical and cultural heritage, including archaeological resources.</p> <p>Sections 17.6 and Section 19 of the Tailored Impact Statement Guidelines require the proponent to assess the Project's positive and adverse effects on traditional cultural activities and cultural heritage, and archaeological resources of importance to Indigenous groups.</p>
105	Wildlife Conservation Society Canada	Commented that the proponent should conduct a Cultural Impact Assessment co-created between the community and relevant experts or advisors.	The Agency will share the comment with the proponent. Requirements for the assessment of cultural heritage are outlined in Sections 12.1, 17.6, and 19 of the Tailored Impact Statement Guidelines.

Mitigation Measures			
106	Attawapiskat First Nation Environment and Climate Change Canada Health Canada Long Lake #58 First Nation Neskantaga First Nation Wildlife Conservation Society Canada	<p>Commented that mitigation measures are important to reduce the impact to fish, migratory birds, and Indigenous peoples' health.</p> <p>It will be necessary to have well thought out mitigation measures that recognize the unique and undisturbed land that the Project will be overprinting. Consultation with Indigenous groups and pulling from expert resources will be essential to find an appropriate balance.</p> <p>Asked if the capping of traffic and transportation of goods would be an applicable mitigation measure.</p>	<p>Section 20 of the Tailored Impact Statement Guidelines require the proponent to identify measures that would mitigate any adverse environmental, health, social and economic effects of the Project, including mitigation measures to reduce impacts to fish, migratory birds and Indigenous peoples health.</p> <p>The Tailored Impact Statement Guidelines require the proponent to engage with Indigenous groups and the public, including experts, local communities and municipalities, when developing mitigation and follow-up program measures. The proponent is also expected to describe mitigations measures proposed by Indigenous groups in the Impact Statement, and if not incorporated, explain why not. The proponent is also required to discuss with Indigenous groups opportunities to participate in follow-up program measures, such as monitoring during the construction and operation phases.</p>
Navigable Waterways			
107	Fort Albany First Nation Nibinamik First Nation Transport Canada	<p>Commented that past, present and anticipated future use of waterways needs to be assessed in the baseline studies to adequately understand potential impacts.</p> <p>Commented that Indigenous groups rely on waterways to travel to sites that are important for hunting, fishing, trapping, harvesting, teaching, and spiritual practices. Concerned the Project will negatively affect the ability to navigate the waters.</p>	<p>Section 10 of the Tailored Impact Statement Guidelines require the proponent to provide baseline information on existing navigable waterways, describe past, current and anticipated future use of all waterways and waterbodies, as well as describe the use of waterways with Indigenous cultural importance.</p>
Other Comments			
108	Webequie First Nation	<p>Commented on the need to confirm baseline data collection methodology and approaches to preparing the Impact Statement with the Agency.</p>	<p>During the impact statement phase, the Agency, in collaboration with federal authorities, will be pleased to discuss methodologies for the baseline and effects assessment studies.</p> <p>In preparation for these meetings, the proponent is expected to inform the Agency about issues and priorities to be discussed during technical meetings by providing detailed and comprehensive study plans at least two weeks in advance to support the technical discussion. The Agency requests that the schedule for when study plans for all technical areas would be submitted by the proponent be provided to the Agency in the coming weeks. This will enable the Agency to notify federal authorities of planned activities to ensure experts are available at the appropriate timeframes.</p>

109	Wildlands League	Commented on the need for an ecosystem approach to assessment of effects on species.	Section 7 of the Tailored Impact Statement Guidelines require the proponent, in describing the biophysical environment, to take an ecosystem approach that considers how the Project may effect the structure and functioning of biotic and abiotic components with the ecosystem using scientific, community and Indigenous knowledge regarding ecosystem health and integrity, as applicable.
110	Aroland First Nation Fort Albany First Nation Ginoogaming First Nation Long Lake #58 First Nation Member of public Wildlife Conservation Society Canada	<p>Asked about pausing the timeline during the planning phase so as to extend the comment period.</p> <p>Asked about the ability of the proponent to start a project activity before the impact assessment is complete.</p>	<p>The Agency is bound by the 180-day planning phase time limit. While the <i>Impact Assessment Act</i> does have provisions to suspend the time limits, this is only applicable under specific circumstances as outlined in section 2 of the <i>Information and Management of Time Limits Regulations</i>.</p> <p>Section 7 of the <i>Impact Assessment Act</i> states that the proponent of a project must not do any act or thing in connection with the carrying out of the designated project, in whole or in part, that may cause specific effects. For more detail please refer to section 7 of the <i>Impact Assessment Act</i> available here: https://laws-lois.justice.gc.ca/eng/acts/I-2.75/page-2.html#h-1160193</p>
111	Webequie First Nation	Commented on challenges of providing certain details in the Impact Statement relating to design, operations, and funding of the Project which will be developed during and after the impact assessment.	<p>The Impact Statement is required to include information about the Project and its feasibility. The Agency notes that Section 3 of the Tailored Impact Statement Guidelines require the proponent to provide an overview of the Project and an updated Project Description, including project components, project activities and workforce requirements. Section 3.1 requires the proponent to include the geographic location of project components including borrow pits, gravel or aggregate pits and water crossings. Section 3.2 requires the proponent to describe the construction, operation and decommissioning phases of the Project, and the anticipated road use during the operations phase (including traffic volume).</p> <p>The Agency also notes that Section 2.1 requires the proponent to identify the secured or anticipated financial means to carry out all project phases, and Section 3.2 requires the proponent to identify the ownership of the project during different phases, and the transfer and control of the different project components. In addition, Section 17.1 requires the proponent to describe the predicted effects of the project on services and infrastructure in the study area.</p> <p>During the impact statement phase, the Agency, in collaboration with federal authorities, will be pleased to discuss methodologies for the baseline and effects assessment studies.</p>

112	Aroland First Nation Eabametoong First Nation Long Lake #58 First Nation Marten Falls First Nation Member of public Neskantaga First Nation Weenusk First Nation	Asked about the application of Ontario regulations to the Project and about the coordination between the Agency and the province of Ontario.	The Cooperation Plan outlines the intentions in relation to coordination between the Agency and the Ontario Ministry of the Environment, Conservation and Parks. Section 2.4 of the Tailored Impact Statement Guidelines require the proponent to describe the regulatory framework, including federal and provincial legislation and regulatory approvals.
113	Member of public	Asked if the federal government would be providing funding to build the Project.	Edits to Section 2.1 of the Tailored Impact Statement guidelines require the proponent to identify the secured or anticipated financial means to carry out all phases of the Project.
114	Aroland First Nation Kasabonika First Nation	Asked if other projects in the region, including the ferrochrome smelter in Sault Ste. Marie and the fibre optic network, would be subject to a federal and provincial assessment. Asked about an environmental assessment for the Eagle's Nest Project as proposed by Noront Resources Inc.	If a proposed project (e.g., Ferrochrome Smelter) includes an activity that is described in the <i>Physical Activities Regulations</i> pursuant to the <i>Impact Assessment Act</i> or if the physical activity has been designated by the Minister for an impact assessment, pursuant to section 9, the Agency will determine if an impact assessment is required and would post a Notice of Determination on the Canadian Impact Assessment Registry website. With respect to the federal assessment for the Eagle's Nest Project that commenced on November 1, 2011, pursuant to the <i>Canadian Environmental Assessment Act, 1992</i> , on August 28, 2019, with the coming into force of the <i>Impact Assessment Act</i> , the federal comprehensive study was terminated per the transitional provisions. Questions regarding the provincial assessment should be referred to the Ontario Ministry of the Environment, Conservation and Parks.
115	Aroland First Nation Fort Albany First Nation Long Lake #58 First Nation Members of the Public Noront Resources Inc.	Asked questions about the proponent's use of past baseline studies and current baseline activity. This needs to be made clear to Indigenous groups and the public.	Section 7 of the Tailored Impact Statement Guidelines require the proponent to provide detailed description of specific data sources, data collection, sampling survey and research protocols and methods followed for baseline studies. In addition, the proponent must engage with Indigenous groups during baseline data collection.
116	Aroland First Nation Municipality of Sioux Lookout Wildlife Conservation Society Canada	Commented on the need of the proponent to engage with a broad range of public stakeholders.	Section 5 of the Tailored Impact Statement Guidelines lays out of the Agency's expectations in relation to the proponent's engagement with the public. The Agency requests the proponent to engage with, at a minimum, the members of the public listed in the Public Participation Plan.
117	Aroland First Nation Long Lake #58 First Nation Neskantaga First Nation Noront Resources Wildlife Conservation Society Canada	Commented on the viability of the proponent to carry out the impact assessment and asked how the province was playing a role.	Questions about the province should be directed to the province. Contact information is found in the Cooperation Plan. Edits to Section 2 of the Tailored Impact Statement Guidelines require the proponent to identify the secured or anticipated financial means to carry out all project phases. Section 3 of the Tailored Impact Statement Guidelines require the proponent to indicate the ownership of the road during each project phase, and to indicate the transfer and control of the different project components during each phase of the project.

118	Member of public	Commented that development of infrastructure projects in the area should be coordinated.	<p>Section 2.2 of the Tailored Impact Statement Guidelines require the proponent to indicate if the Project is part of a larger sequence of projects, and must outline the larger context, including likely future developments by other proponents that will may use project infrastructure, and activities that may be enabled by the current Project.</p> <p>Sections 4.1 and 4.2 require the proponent to describe the purpose and need for the Project, to identify the objective of the Project and describe the underlying opportunity or issue that the Project intends to solve.</p>
119	Wildlife Conservation Society Canada	Commented that the Ontario's Far North Biodiversity Project contains valuable information on invertebrates, bats, birds, amphibian, reptiles, fishes, and mammals.	The Tailored Impact Guidelines provide the Far North Biodiversity Project as a reference to the proponent's baseline studies.
120	Noront Resources Inc.	Commented that the Project has the ability to become political and certain stakeholders may be better funded than others.	The Agency will share the comment with the proponent and Ontario.
121	Ministry of Energy, Northern Development and Mines	Commented that the provincial ministries would like to participate in technical meetings organized by the Agency.	The Agency will invite provincial ministries to determine potential participation in technical meetings with the proponent.
122	Wildlife Conservation Society Canada	Commented that the Tailored Impact Statement Guidelines should direct the proponent to clarify what opportunities have been provided to it to allow them to exercise powers and duties under the Act (paragraph 114 (1)(d) and (e)).	The provision quoted in the comment does not apply to the proponent's conduct in the impact assessment.
123	Neskantaga First Nation	How will the impact assessment provide an answer to the question of whether the Project is in the public interest.	<p>The public interest factors are described in section 63 of the <i>Impact Assessment Act</i>. The Tailored Impact Statement Guidelines have been developed with a view to gather the information required to inform the Minister's decision-making along those factors. The Agency's Impact Assessment Report will provide the Minister with a discussion of whether the adverse effects within federal jurisdiction and the adverse direct or incidental effects are significant. The public and Indigenous groups will be provided an opportunity to review a draft of the Agency's Impact Assessment Report as outlined in the Public Participation Plan and the Indigenous Engagement and Partnership Plan.</p> <p>Section 4.2 of the Tailored Impact Statement Guidelines require the proponent to provide supporting information that demonstrates the need for the Project, inclusive of needs expressed by other parties that may share the need for the Project (e.g., public, Indigenous groups, governments).</p>

124	Members of the Public Wildlife Conservation Society Canada	Open house type discussions are a more effective way to engage the public than WebEx models. However, WebEx's are also another way to participate for those not located in the chosen Open House locations. Commented that libraries should be utilized more to gather people for public WebEx's.	The Agency welcomes feedback on preferred methods of engagement. The Indigenous Engagement and Partnership Plan and the Public Participation Plan list engagement tools and approaches that may be used by the Agency and the proponent.
125	Eabametoong First Nation Environment and Climate Change Canada Federal Economic Development Initiative for Northern Ontario Fort Albany First Nation Health Canada Marten Falls First Nation Member of public Ministry of Energy, Northern Development and Mines Wildlife Conservation Society Canada	Commented that instructions in the Tailored Impact Statement Guidelines on data collection and validation, as well as the assessment of effects, should be clear to the proponent, Indigenous Groups, and the public.	Section 5 and 6 of the Tailored Impact Statement Guidelines outline requirements for public participation and Indigenous engagement in preparation of the Impact Statement, including the requirement for a record of engagement that outlines efforts to gather community and Indigenous knowledge and how it was applied to the assessment. The Agency has made every effort to be clear in the Tailored Impact Statement Guidelines, but if there are any questions on interpreting the information in the Tailored Impact Statement Guidelines, please contact the Agency using the contact information provided on the Registry.
Project Contribution to Sustainability			
126	Aroland First Nation Friends of the Attawapiskat River Neskantaga First Nation Wildlife Conservation Society Canada	Commented that sustainability needs to incorporate a regional perspective, including Indigenous groups knowledge systems around the Seven Generations Teachings and land stewardship.	Additions were made to Sections 24 and 25 of the Tailored Impact Statement Guidelines that 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 including sustainability as defined by Indigenous groups, such as "Seven Generations Teachings" and "Seven Generation Stewardship".

Purpose of and Need for the Project and Project Expansion			
127	Aroland First Nation Neskantaga First Nation Kitchenuhmaykoosib Inninuwug Member of public	Asked for clarity on the Northern Road Link (road that may link the northern portion of the Marten Falls Community Access Road to the Ring of Fire area), including the potential for the Webequie Supply Road Project to connect to the Northern Road Link.	Section 2.2 of the Tailored Impact Statement Guidelines require the proponent to indicate if the Project is part of a larger sequence of projects, and must outline the larger context, including likely future developments by other proponents that will may use project infrastructure, and activities that may be enabled by the current Project.
128	Mushkegowuk Tribal Council Neskantaga First Nation Nibinamik First Nation Wildlife Conservation Society Canada Wildlands League	Commented that the purpose of the Project is unclear. It appears that the Project is being built to develop the Ring of Fire area for resource extraction. The Tailored Impact Statement Guidelines should compel the proponent to be clear about the purpose of the Project.	Sections 4.1 and 4.2 require the proponent to describe the purpose and need for the Project, to identify the objective of the Project and describe the underlying opportunity or issue that the Project intends to solve. Section 3 require the proponent to provide an updated project description as part of the Impact Statement, including project components, project activities and workforce requirements.
Regional Assessment			
129	Aroland First Nation Eabametoong First Nation Fort Albany First Nation Neskantaga First Nation Member of public Wildlife Conservation Society Canada Wildlands League	Commented that a regional assessment is necessary to understand the potential impacts of development in the Ring of Fire area and have a fulsome scope of Indigenous consultation and participation.	On February 10, 2020, the Minister determined that a regional assessment of the Ring of Fire area will be conducted pursuant to the <i>Impact Assessment Act</i> . Further information can be found on the Canadian Impact Assessment Registry at: https://iaac-aeic.gc.ca/050/evaluations/proj/80468?culture=en-CA
Residual Effects			
130	Attawapiskat First Nation	Commented that the scope of residual impacts cannot simply be measured in terms of percentage of habitat or the percentage of a wildlife population that is eliminated by the Project. This does not adequately represent the impacts to First Nation community members.	Section 5 and 6 of the Tailored Impact Statement Guidelines outline requirements for public participation and Indigenous engagement in preparation of the Impact Statement, including the requirement for a record of engagement that outlines efforts to gather community and Indigenous knowledge and how it was applied to the assessment.

Riparian and wetland environments			
131	Attawapiskat First Nation Fort Albany First Nation Friends of the Attawapiskat River Mushkegowuk Tribal Council Weenusk First Nation Wildlands League Webequie First Nation	Commented that the Tailored Impact Statement Guidelines do not adequately reflect the unique ecological and hydrological cycles of the muskeg. Larger regional studies are required to understand the impacts development will have on the wetlands in the Ring of Fire area. Potential impacts could include flooding, contamination, and drying up of peatlands.	On February 10, 2020, the Minister determined that a regional assessment of the Ring of Fire area will be conducted pursuant to the <i>Impact Assessment Act</i> . In addition, Section 22 of the Tailored Impact Statement Guidelines require the proponent to conduct a cumulative effects assessment to consider cumulative effects of past, present and reasonably foreseeable projects. Section 8.5 requires the proponent to describe baseline conditions of riparian and wetland environment, including a description capacities to perform hydrological and ecological functions. Section 14.3 requires the proponent to assess the effects of the Project on the riparian and wetland environment, including contamination and drainage changes
132	Health Canada-Public Health Agency of Canada Indigenous Services Canada-First Nations and Inuit Health Health Canada Ministry of Heritage, Sport, Tourism, and Culture Industries Environment and Climate Change Canada Natural Resources Canada Wildlife Conservation Society Canada	Provided editorial comments on Sections of the Tailored Impact Statement Guidelines related to wetland environments to provide clarity.	The Agency has applied editorial comments received from the public, federal and provincial governments and Indigenous groups, throughout the Tailored Impact Statement Guidelines as appropriate.
Social General Factors			
133	Aroland First Nation Ministry of Energy, Northern Development and Mines	Commented that community cohesion needs to be better defined for clarity.	An addition was made to Section 17.4 to provide a definition of community cohesion.
134	Member of public	Commented that impacts on services and infrastructure in the region as a result of the Project and a potential influx of people will need to be addressed in the Impact Statement.	The Tailored Impact Statement Guidelines require that the proponent consider changes to health, social and economic conditions, including positive and negative consequences. This assessment should consider services and infrastructure in the region. Requirements for baseline conditions on health, social and economic conditions are outlined in Sections 9, 10 and 11. Requirements for the effects assessment on health, social and economic conditions are outlined in Sections 16, 17 and 18.
Species at Risk			
135	Fort Albany First Nation	Commented that the impact statement should consider the impact of the Project on diseases in animals (such as chronic wasting disease)	Edits to Sections 15.3 and 15.4 of the Tailored Impact Statement Guidelines require the proponent to describe the potential effects of the project on terrestrial wildlife and species at risk, including increased potential for spread of disease and invasive species introduction.

136	Attawapiskat First Nation Environment and Climate Change Canada Friends of the Attawapiskat River Ginoogaming First Nation Kitchenuhmaykoosib Inninuwug Members of the public Mushkegowuk Tribal Council Wildlife Conservation Society Canada	Concerned 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.	Section 15.4 of the Tailored Impact Statement Guidelines require the proponent to assess adverse effects on Species at Risk 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. Section 20 requires the proponent to indicate how they intend to mitigate effects to caribou.
137	Aroland First Nation Environment and Climate Change Canada Wildlife Conservation Society Canada Webequie First Nation	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, Wolverine, Bank Swallow, Evening Grosbeak, Peregrine Falcon, Rusty Blackbird, and species identified by Indigenous groups.	Section 15.4 of the Tailored Impact Statement Guidelines require the proponent to assess adverse effects on Species at Risk 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. In addition, a list of species at risk found in the project area is provided, and the proponent is required to address each species at risk as an individual valued component. The Agency also notes that Section 20 requires the proponent to indicate how they intend to mitigate effects to species at risk
Surface Water Quality and Quantity			
138	Aroland First Nation Attawapiskat First Nation Environment and Climate Change Canada Fort Albany First Nation Kasabonika Lake First Nation Long Lake #58 First Nation Webequie First Nation Wildlife Conservation Society Canada	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, downstream of the Project, and freshwater springs.	Edits were made to Sections 7 and 8.6 of the Tailored Impact Statement Guidelines, the proponent is required to engage Indigenous groups during baseline information gathering on surface water quality. The proponent is required to identify areas potentially impacted by changes to water quality and quantity or changes in flow in the watershed and hydrologically connected waters. Section 14.2 requires the proponent to assess the Project's effects on surface water including identifying potential contamination, sedimentation, dust deposition, erosion, and disruption of wetland hydrology. Section 22 requires the proponent to identify cumulative effects of the Project. Section 15.5 requires the proponent to describe the Project's effect on climate change
139	Mushkegowuk Tribal Council	Commented that impacts to water table levels should be assessed.	Section 14.2 of the Tailored Impact Statement Guidelines indicates requires the proponent to assess the effects of the Project on groundwater quantity and quality.

Terrestrial Wildlife and their Habitat			
140	Attawapiskat First Nation Aroland First Nation Environment and Climate Change Canada Fort Albany First Nation Ginoogaming First Nation Indigenous Services Canada- Lands and Economic Development Kasabonika Lake First Nation Long Lake #58 First Nation Marten Falls First Nation Nibinamik First Nation Webequie First Nation Wildlife Conservation Society Canada	<p>Commented about effects on wildlife, including due to noise, habitat disruption, changes to home range and movement patters, road collisions, human disturbance, sensory disturbance, and increased recreational activities.</p> <p>Wildlife should include insects, invasive species, marine mammals, and pests.</p>	<p>Edits were made to Sections 15.3 of the Tailored Impact Statement Guidelines that require the proponent to assess the project effects on terrestrial wildlife and their habitat (including insects) including but not limited to noise and sensory disturbances, increased air traffic, habitat alteration, air emission and dust, increase predation, invasive species and poaching opportunities.</p> <p>Section 7 requires the proponent to engage with Indigenous groups to gather baseline data. Section 15.5 requires the proponent to consider Project effects to climate change. Section 22 requires the proponent to assess the cumulative effects of the Project.</p> <p>The Agency also notes that marine mammals are out of scope for the assessment of the current project.</p>
Vegetation			
141	Attawapiskat First Nation Fort Albany First Nation Member of public	<p>Commented that there is potential for loss and adverse effects to native and rare vegetation due to construction activities, use of roadside herbicides, and water disturbances.</p> <p>If herbicides are used, the proponent needs to be clear how impacts will be mitigated.</p>	<p>Section 8.7 of the Tailored Impact Statement Guidelines require the proponent to identify baseline vegetation conditions and any herbicide use to control vegetation. Section 14.3 requires the proponent to identify potential adverse effects of the Project on vegetation.</p> <p>Section 20 requires the proponent to provide mitigation measures.</p>
Vulnerable Population Groups (Gender Based Analysis Plus)			
142	Aroland First Nation Eabametoong First Nation Fort Albany First Nation Neskantaga First Nation	<p>Commented that Gender Based Analysis Plus should be conducted to adequately understand impacts on vulnerable population groups, such as women, disabled persons, elders and youth. Asked how this would be analysed and applied in the baseline studies in the context of each unique community.</p>	<p>Section 7 requires the application of Gender Based Analysis Plus to the baseline descriptions in order to provide baseline conditions for diverse subgroups. Sections 9, 10 and 11 require the proponent to provide disaggregated data and gender statistics for diverse subgroups on health, social and economic conditions to support the analysis of Gender Based Analysis Plus.</p>
143	Health Canada Women and Gender Equality Canada	<p>Provided comments on Gender Based Analysis Plus in the Tailored Impact Statement Guidelines to add clarity and direction for the proponent.</p>	<p>The Agency has incorporated advice from federal authorities, provincial government, the public and Indigenous groups regarding sources of information to support the preparation of the Impact Statement throughout the Tailored Impact Statement Guidelines. Relevant resources have also been added to Appendix 1 of the Tailored Impact Statement Guidelines.</p>