

Comments from the Federal Review Team on Marten Falls Community Access Road Project Social Study Plan – November 8, 2021

It is essential that the Impact Statement for the Marten Falls Community Access Road Project (the Project) address all requirements outlined in the Tailored Impact Statement Guidelines (the Guidelines), and that the study plans outline a clear approach to achieving these requirements. The Impact Assessment Agency of Canada (the Agency) has highlighted sections of the Guidelines where requirements for the Impact Statement may not be met, based on content of the draft study plan submitted to the Agency. Note that this table does not provide an exhaustive list of the requirements described in the Guidelines. The Guidelines should be reviewed in their entirety, including the sections identified below.

General Comments from the Impact Assessment Agency of Canada on the Marten Falls Community Access Road Draft Study Plans – July 2, 2020					
ID #	Guidelines Section¹	Required Action for Proponent	Proponent Response	Final Study Plan Section Reference	Agency comments
GC-01	Section 5 - Public Participation and views (including 5.1, 5.2)	<p>Provide a clear description in the study plans of how public engagement opportunities have been and/or will be integrated into the impact statement phase. This must include detail on how the public will have opportunities to provide input to contribute to the development of the Impact Statement, as required in Section 5 of the Guidelines.</p> <p>Describe what engagement with the members of the public listed in the Public Participation Plan has been done in the development of the study plans, and/or any planned engagement with members of the public on the proposed study plans.</p>	<p>Section 4: describes how the Proponent will provide Project notices and opportunities with members of the public listed in the Public Participation Plan. This will also include the opportunity to provide input on the existing environment, VCs, effects assessment methods, effects assessment results, and mitigation and follow-up program measures as applicable. A variety of activities will be offered so that members of the public are informed of the IS / EA Report as it progresses and are aware of the opportunities and means to provide their input.</p> <p>- The study plans have recognized public and agency input received on the Project to date.</p>	Section 4.1 “A variety of activities will be offered so that members of the public are informed of the IS / EA Report as it progresses and are aware of the opportunities and means to provide their input.”	<p>Section 4.1 of the study plan mentions that “a variety of activities will be offered”, however, no details on the likely engagement activities are provided.</p> <p>As required by Section 5 of the Guidelines, the Impact Statement must provide a record of engagement that describes all efforts taken to seek the views of local communities and other stakeholders with respect to the Project, including on the study plans. This record of engagement is to include all engagement activities undertaken prior to the submission of the Impact Statement, including prior to and during the planning phase, and in the preparation of the Impact Statement.</p> <p>Provide details on the timeline for public engagement relative to the project workplan, including engagement relative to the schedule for baseline work, and in consideration of the project team’s timeline for the development of the Impact Statement.</p> <p>Demonstrate in the Impact Statement that comments provided by members of the public on social conditions are taken into consideration. Comments provided to the Agency are available on the Canadian Impact Assessment Registry Internet site at: https://iaac-aeic.gc.ca/050/evaluations/proj/80184/contributions</p>
GC-02	Section 6 - Description of Engagement with Indigenous Groups (including 6.1, 6.2, 6.3)	<p>Provide a clear description in the study plans of how all Indigenous groups listed in the Indigenous Engagement and Partnership Plan will have opportunities to provide Indigenous knowledge, including the validation of how information they provided was applied. The study plan should include a description of the proposed methods for data collection, management of confidentiality, and information storage. This should also include a methodology for tracking information that has been approved by the group, to demonstrate that the guidance outlined in Section 6.2 of the Guidelines has been incorporated into the study plans.</p> <p>Describe what engagement with all the Indigenous groups listed in the Indigenous Engagement and Partnership Plan has been done in the development of the study plans, and/or any planned engagement with Indigenous groups on the proposed study</p>	<p>- In Section 4.2 it is noted that the Proponent will provide Project notices and opportunities for consultation and engagement with Indigenous communities identified in the Indigenous Partnership and Engagement Plan. A variety of activities will be offered so that Indigenous communities are informed of the IS / EA Report as it progresses and are aware of the opportunities, means and timelines to provide their input.</p> <p>- Section 2.1.1 outlines the approach to handling confidential information, by means of permission from Indigenous communities to include Indigenous Knowledge in the IS / EA Report, regardless of the source of the Indigenous Knowledge.</p> <p>- The study plans have recognized Indigenous community input received on the Project to date.</p>	Section 4.2 “...A variety of activities will be offered so that Indigenous communities are informed of the IS / EA Report as it progresses and are aware of the opportunities, means and timelines to provide their input...” “...Indigenous communities will have the opportunity to comment on components of the study plans throughout the IS / EA Report consultation and engagement process...”	<p>Section 4.2 of the study plan states that “a variety of activities will be offered”, however, no details on the planned engagement activities are provided.</p> <p>Section 4.2 of the study plan also states that “Indigenous communities will have the opportunity to comment on components of the study plans throughout the IS / EA Report consultation and engagement process”, however, it is unclear on which components of the study plans the project team plans to engage. It is also unclear whether Indigenous groups will be provided with a meaningful opportunity to provide input on a preliminary approach/method for baseline data collection, as required in Section 6 of the Guidelines, or if engagement will take place after the baseline data collection is complete.</p> <p>Provide details on the timeline for Indigenous engagement on the social study plan, including engagement relative to the schedule for baseline work, and spatial and temporal boundaries determinations, and particularly in relation to collection of Indigenous knowledge, and in consideration of the project team’s timeline for the development of the Impact Statement.</p> <p>Demonstrate in the Impact Statement that comments provided by Indigenous groups on social conditions were taken into consideration.</p>

¹ Refer to complete sections of the Guidelines for more context.

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		plans, particularly in relation to collection of Indigenous knowledge (i.e. develop the work plan in collaboration with those Indigenous groups that would need to provide knowledge).			Comments provided to the Agency are available on the Canadian Impact Assessment Registry Internet site at: https://iaac-aeic.gc.ca/050/evaluations/proj/80184/contributions
GC-03	Section 6.2 - Analysis and response to questions, comments, and issues raised	Revise the study plans to include an approach to handling confidential information that demonstrates adherence to the guidance provided in Section 6.2 of the Guidelines.	<ul style="list-style-type: none"> - Section 2.1.1: Section has been updated to include information regarding both confidentiality and permission information on all collected Indigenous Knowledge, regardless of the source. - This section also includes how information regarding the Indigenous Knowledge Sharing Agreements will be established by the Proponent and Indigenous community participating in the Program. 	Section 2.1.1 “...Sensitive and / or confidential information collected through Indigenous Knowledge Sharing Agreements will be protected from public or third-party disclosure and will be established between the Proponent and Indigenous communities participating in the Indigenous Knowledge Program prior to the sharing and use of any sensitive information. Instances where Indigenous Knowledge sharing has taken place during consultation activities (e.g., meetings) will be recorded in the Record of Consultation and Engagement, including where Indigenous Knowledge was incorporated into Project decisions and into the IS / EA Report (i.e., specifics will not be included in the Record of Consultation and Engagement given the potential sensitivity and / or confidentiality of the information shared)...”	<p>As required in Section 6 of the Guidelines, describe the confidential information provided by each Indigenous group. Present the content in sufficient detail to support understanding of the potential effects and impacts on rights, while also protecting confidential/sensitive specifics and respecting stipulations in the confidentiality agreements (e.g, use buffer areas instead of specific locations, etc.).</p> <p>Provide to the Agency, in the form of a letter from the Indigenous group that shared confidential information, a letter confirming that:</p> <ul style="list-style-type: none"> • the Indigenous group that provided confidential information is satisfied with the way the Impact Statement was informed; • the Indigenous group that provided confidential information is satisfied with the way the issue was solved or addressed.
GC-04	Section 7.4 Spatial and temporal boundaries	<p>Describe the approach to be implemented to demonstrate how the definitions of the proposed study area boundaries:</p> <ul style="list-style-type: none"> • encompass the anticipated boundaries of the Project’s effects, including all potentially impacted local communities, municipalities and all Indigenous groups listed in the Indigenous Engagement and Partnership Plan; and • take into account community knowledge and Indigenous knowledge; current or traditional land and resource use by Indigenous groups; exercise of Aboriginal and Treaty rights of Indigenous peoples, including cultural and spiritual practices; physical, ecological, technical, social, health, economic and cultural considerations; and the size, nature and location of past, present and foreseeable future projects and activities. 	<ul style="list-style-type: none"> - Section 6.2: General information on study areas for the Project, including a detailed list of what was considered to develop the discipline-specific local and region study areas, is included in each study plan. Each study area has been proposed taking into consideration community knowledge and Indigenous Knowledge, current or traditional land and resource use by Indigenous communities, and the exercise of Aboriginal and Treaty Rights of Indigenous peoples, including cultural and spiritual practices, physical, ecological, technical, social, health, economic and cultural considerations available at this time. - The proposed discipline-specific study areas are preliminary. The proposed study areas will be consulted and engaged on early in the IA / EA process. In addition, the Indigenous Knowledge Program provides additional 	<p>Section 6.2.1 “The preliminary LSA currently being considered within the scope of the ongoing provincial regulatory review process generally includes the area within 2.5 km of the centreline of Alternative 1 and Alternative 4”.</p> <p>7.2.2 Primary Data Collection “The specific scope of the primary data collection program will be informed by the final Social study areas. However, it is anticipated that primary data collection will focus on the communities in the Social LSA which are most likely to be affected by the Project, including MFFN and Aroland First Nation (Section 6.2). Based on the nature of the socio-community, primary data will also be collected in the Municipality of Greenstone (Geraldton) that serves as the regional service centre. These communities are likely to experience the most Project-related change due to the</p>	<p>Section 7 of the Guidelines, states that “The size, nature and location of past, present and foreseeable future projects and activities are factors that should be included in the definition of spatial boundaries.”</p> <p>It is unclear how a Local Study Area of 2.5 km from the centreline of the Project would be appropriate to assess direct effects on social conditions. At a minimum, all project components (including aggregates sources, access roads, etc.), the upgrades to the Anaconda and Painter Lake forestry access roads, the Northern Road Link Road Project, the Webequie Supply Road Project, as well as winter roads, and activities and communities connected through these roads, should be included in the Local Study Area.</p> <p>As required in Section 7.4.1 of the Guidelines, provide information regarding how the following were/will be taken into account in defining the spatial boundaries: community knowledge and Indigenous knowledge; current and traditional land and resource use by Indigenous groups; exercise of Aboriginal and Treaty rights, including cultural and spiritual practices; physical, ecological, technical, social, health, economic and cultural considerations; and the size, nature and location of past, present and reasonably foreseeable future projects and activities.</p>

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			opportunities for community knowledge and Indigenous Knowledge, current or traditional land and resource use by Indigenous communities, and the exercise of Aboriginal and Treaty Rights of Indigenous peoples to be shared in greater detail.	location of the Project and its resulting access.”	Ensure that the social conditions Regional Study Area encompasses the spatial boundary of cumulative effects. Provide the above information in a way that allows those who provided the knowledge to the proponent and the Agency to see their input reflected in the Impact Statement. It is not sufficient to state that “input from participants will be/was taken into account”.
GC-05	Section 7 - Baseline Methodologies (Including 7.1, 7.2, 7.3, 7.4)	<p>Provide clear descriptions in the study plans of the proposed study areas and the criteria used to define the study areas for each valued component.</p> <p>Provide clear descriptions of the timing of previously collected data (days/month/year) and future approximate (month/year or season/year) for every field work planned and the criteria used to tailor the temporal boundaries to the valued components under consideration.</p> <p>Describe how all Indigenous groups listed in the Indigenous Engagement and Partnership Plan will be, or have been, engaged to provide input on spatial and temporal boundaries.</p> <p>Explain how the Agency will be provided opportunities to validate spatial and temporal boundaries.</p>	<ul style="list-style-type: none"> - Local Study Area (LSA) and Regional Study Area (RSA) for each valued component are described in Table 6-1, including rationale used to define the area. - Study plans have been designed considering historical information, where applicable and available. Study plans will be updated with appended Work Plans, to be submitted at a future date, which will detail upcoming planned field activities. - As detailed in both Section 4.2 and Section 6.2 the Proponent will continue to provide opportunities for neighbouring Indigenous communities and interested persons to provide input and inform the effects assessment, including the LSAs and RSAs. - Government agencies and interested persons will have the opportunity to comment on component of the study plans throughout the IS / EA Report consultation and engagement process 	<p>Sections 4.3, 4.4, 7.2.2 and 7.3</p> <p>Section 4.3 “...The social data collection program is expected to include targeted interviews, focus groups, questionnaires and other niche tools to gather information from diverse populations to resolve gaps in socio-economic secondary data. These diverse populations include the aforementioned identity groups, which are also referenced in the IS / EA Consultation Plan, and those identified by communities during consultation and engagement...”</p> <p>Section 4.4 “...For the Indigenous communities that express specific Social concerns, targeted engagement for the purposes of Social data collection will be implemented through the Social primary data collection program consistent with the likelihood of effect anticipated to the community as determined by the MFFN CAR Project Team...”</p> <p>Section 7.2.2 “...Focused data collection on gaps identified in the secondary sources related to VCs and indicators such as quality factors for services and infrastructure...”</p> <p>Section 7.3 “... The primary Social data collection is anticipated to be conducted during the Spring and Summer of 2021, however this timing is subject to change and dependent on the larger Project schedule including engagement and consultation activities. ...”</p>	<p>It is unclear whether any secondary baseline studies have been conducted to identify potential gaps in the baseline information requirements described in Section 10 of the Guidelines. Primary data collection should be used where secondary sources are unable to provide the required information.</p> <p>Update the study plan to provide the current status of the secondary baseline data collection analysis and specify where gaps need to be addressed to meet the requirements in Section 10 of the Guidelines.</p> <p>To ensure that baseline data collection will meet the requirements of the Guidelines, the Agency advises the project team to share a work plan describing how the survey for social data collection will be conducted. If it is not possible to provide this information in the study plans or work plans, the Agency requires an opportunity to review the collected baseline data/baseline reports prior to the preparation of the Impact Statement documentation.</p> <p>Include in the Impact Statement a baseline community profile for <u>each</u> Indigenous group listed in the Indigenous Engagement and Partnership Plan and for each local community listed in the Public Participation Plan, to meet the requirements of Section 10 of the Guidelines. The baseline community profiles should be used to inform the effects assessment required by Section 17 of the Guidelines.</p>
GC-06		Provide further details in the study plans on how GBA+ has been integrated into all aspects of data collection methodology, as	- Section 4.3 has been updated to include the consideration of Identity and Gender-Based Analysis Plus (GBA+) including both Indigenous communities	Section 4.3	The study plan does not sufficiently describe how GBA+ will be utilized throughout the consultation process to better inform the baseline data.

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		per Section 7.1 of the Guidelines, and into the assessment of effects and impacts, as mentioned in Sections 13, 20, 21, and others, related to effects assessments of the Guidelines	and their relevant subpopulations and non-Indigenous communities and their subpopulations. During consultation and engagement activities these groups (and any others defined during consultation) will be engaged with on targeted input.		<p>A GBA+ framework should be applied to analyze historic and current power relations, decision-making processes, and how gender intersects with health, social, and economic conditions.</p> <p>Include equity considerations as a tool to ensure inclusiveness in the engagement process.</p> <p>Describe how GBA+ has been or will be applied to the consideration of engagement activities. Identify specific methods targeted to specific subgroups.</p> <p>Provide detail on how GBA+ has been integrated into all aspects of data collection methodology, including for the definition of indicators, as per Section 7.1 of the Guidelines, and into the assessment of effects and impacts, as mentioned in Sections 10, 13, 20, 21, and others, related to effects assessments of the Guidelines.</p> <p>It is not sufficient to mention that Gender-Based Analysis Plus will be applied to the assessment. Clear descriptions of how GBA+ was integrated (including to which variables, method, and how it influenced results' interpretation) are needed in the Impact Statement.</p>
GC-07	Section 13 - Effects Assessment (including 13.1, 13.2)	<p>Provide details to demonstrate how the Project's potential effects will be considered, as per the requirements in Sections 13 to 19 of the Guidelines. Ensure that the effects assessment considers the effects of each of the project components and physical activities, in all phases, and that it is based on a comparison to the proposed baseline work.</p> <p>Provide detail on how engagement with all Indigenous groups listed in the Indigenous Engagement and Partnership Plan and the public will inform the effects assessment and the selection of mitigation measures and follow-up program measures.</p>	<ul style="list-style-type: none"> - Project environmental interaction are separated into Project phases, and Project activities for each environmental discipline in their VC-specific study plan listed as Table 9-1. - Information collected through the various activities (e.g., field studies and programs, effects assessments) of each discipline area (e.g., wildlife, vegetation, cultural heritage) will be shared with the Indigenous Knowledge Program leads. This will support the establishment of the existing environment and the effects assessment for the Aboriginal and Treaty Rights and Interests environmental discipline, as well as the identification of potential mitigation measures and monitoring programs. 	Throughout the study plan, Section 9	<p>As required in Sections 7 and 13 of the Guidelines, ensure that the effects assessment considers the effects of each of the project components (including but not limited to all alternative routes brought forward in the Impact Statement, all aggregates sources, access roads, etc.) and physical activities, in all phases, and that the assessment is based on a comparison to the data and information gathered during the proposed baseline work.</p> <p>Clarify the level of information that will be shared with, and explained to, the Indigenous Knowledge Program leads and whether study plans will be made available to all Indigenous groups listed in the Indigenous Engagement and Partnership Plan.</p>
GC-08	Section 13.1	Provide clear descriptions of the rationale behind the assumptions, including but not limited to the assumed average daily traffic and vehicles composition during the construction and operation phases that will be considered for the effects assessment and the cumulative effects assessment.	<ul style="list-style-type: none"> - Section 10: Current assumptions to be used in the effects assessment have been identified. Any additional assumptions will be identified and rationale will be provided in the IS / EA Report. 	Section 10 “...The MFFN CAR Project Team is not aware at this time of key assumptions that will be recognized in the Social Assessment. These will be determined during the development of the IS / EA Report. Key assumptions made and used in the assessment of Social impacts will be documented in the IS / EA Report...”	<p>Before conducting the effects assessment analysis, the Agency advises the proponent to seek the Federal Review Team's confirmation of the assumptions that will be used in the analysis or, at a minimum, to discuss the type of assumptions that will be considered.</p> <p>As required by Section 13.1 of the Guidelines, ensure that the Impact Statement clearly outlines the assumptions used for the assessment of effects, including cumulative effects, on each valued component.</p>
GC-09	Section 19.2 - Impacts on the Exercise of	Describe an approach for identifying the potentially impacted rights of Indigenous peoples of Canada that are recognized and	<ul style="list-style-type: none"> - All study plans reference how potential effects on Indigenous rights will be 	Section 5, and Section 6.2.2 in the Aboriginal and Treaty Rights and Interests Study Plan	Feedback will be provided in the Federal Review Team's comments package on the Aboriginal and Treaty Rights and Interests Study Plan.

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	Aboriginal and Treaty Rights	affirmed by section 35 of the <i>Constitution Act, 1982</i> , and for integrating the potential impacts on those rights into the collection of baseline information and the effects assessment.	assessed in the Aboriginal and Treaty Rights and Interests Study Plan. - Impacts on Rights considerations are explained in the rationale for defining a Local Study Area and Regional Study Area for Aboriginal and Treaty Rights and Interests VCs. Further information for this is listed in Section 6.2.2 in the Aboriginal and Treaty Rights and Interests Study Plan.		
GC-10	Section 20 - Mitigation and enhancement measures	Provide detail on the approach to meeting the requirements of Section 20 of the Guidelines regarding the identification of mitigation and enhancement measures.	- Section 9: Approach to mitigation and enhancement measures, specifically noting that once potential effects have been identified, the effects assessment will explore technically and economically feasible mitigation measures to avoid or minimize the identified negative effects and enhancement measures to increase positive effects.	Section 9.5.1	Ensure that the Impact Statement provides a description of the method or approach followed to meet the requirements of Section 20 of the Guidelines.
GC-11	Section 25 – Description of the Project’s contribution to sustainability	Provide detail on the approach to meeting the requirements of Section 25 of the Guidelines regarding the description of the Project’s contribution to sustainability.	Section 9: the sustainability assessment for the Project will be undertaken on the preferred alternative and will characterize the Project’s contribution to sustainability incorporating the requirements set out in Section 25 of the Guidelines.	Section 9.7	Section 9.7 of the study plan is listing the requirements outlined in Section 25 of the Guidelines. Ensure that the Impact Statement provides a description of the method or approach followed to meet the requirements of Section 25 of the Guidelines.
GC-15	Concordance with Federal Guidance	Provide a separate concordance table containing all requirements of the Guidelines. This is required to show how all requirements of the Guidelines, including the interactions of effects and interconnectedness of valued components, would be addressed.	Please refer to Table 11-1, Table 11-3 and the General Comments Table Response.	Table 11-1	The Agency has identified inconsistencies between the cross-references presented and the information contained in the study plans. For example, ID# 30 in Table 11-1 of the Aboriginal and Treaty Rights and Interests (ATRI) study plan indicates that “ <i>the assessment of potential changes to language will be led by the socio-community assessment – refer to the Social Study Plan for more information</i> ”. However, the social study plan does not mention language. Demonstrate in either the ATRI study plan or the social study plan the approach for assessing potential changes to language and update the concordance table accordingly. Provide a separate concordance table that describes the content of each study plan. This is needed to cross-check all plans against the Guidelines and demonstrate how all requirements of the Guidelines would be met.

Preliminary Comments from the Impact Assessment Agency of Canada on the Draft Socio-community Study Plan submitted on May 22, 2020:						
ID #	Draft Study Plan	Guidelines Section ²	Required Action for Proponent	Proponent Response	Study Plan Reference	Agency Response
SO-01	Section 3	Section 6.2	Required Action # 1: Update the study plan to reflect how the expectations highlighted from Section 6.2 of the Guidelines will be met.	Indigenous communities will be engaged with as part of the overall consultation and engagement program for the Project, which is summarized in Section 4 of the updated Study Plan. Section 5 of the Study Plan also describes the Indigenous Knowledge Program, another avenue for Indigenous communities to provide input on the Project. Indigenous Knowledge related to the Social VCs and indicators will be considered in the Social Assessment.	Sections 4 and 5	Required action # 1 was partially addressed. See comments GC-02, GC-04, and GC-05 above.
SO-02	Section 4.1	Section 6	<p>Required Action # 2: Update the study plan to include the list of all Indigenous groups that will be engaged, at a minimum the Indigenous groups listed in the IEPP, as part of the baseline data collection and effects assessment analysis. The list should be consistent throughout the study plan.</p> <p>Required Action # 3: Clarify whether the Indigenous groups in the IEPP have been provided an opportunity to comment on the list of criteria and indicators in the study plan and whether the group has a direct community-level socio-community interest in the Project footprint, prior to being screened out of the socio-community Local Study Area.</p>	<p>- A list of all Indigenous communities identified in the Indigenous Partnership and Engagement Plan for the Marten Falls Community Access Road Project Impact Assessment that are to be engaged with has been provided in the updated Study Plans (Table 4-1).</p> <p>- Inputs received to date from Indigenous communities, agencies and interested persons through the Consultation and Engagement Program, including inputs received on the Draft ToR, have also been used to inform the selection of the VCs and indicators for the Social discipline. The VCs / Indicators (or assessment criteria as presented in the ToR) are to be considered as draft. The final list of VCs and indicators to be used in the Social Assessment will be based on regulatory agency guidance, professional judgement and future input received through the Project consultation and engagement activities with Indigenous communities and interested persons.</p> <p>- Indigenous communities will be provided the opportunity to be involved at critical decision-making points throughout the assessment so that the Proponent can consider and incorporate, where appropriate, Indigenous Knowledge and Social discipline related information into the Project as it pertains to the existing environment, VCs and indicators, effects assessment methods, effects assessment results, and mitigation and follow-up program measures.</p> <p>- A summary of the consultation plan has been provided in the Study Plan (Section 4.); further details can be found in the IS / EA Consultation Plan (AECOM 2020) included as Appendix B of the Proposed ToR for the Project.</p>	Section 4, Table 4-1	<p>Required action # 2 was adequately addressed.</p> <p>Required action # 3 was partially addressed.</p> <p>Provide a workplan that clearly outlines the approach to engage Indigenous groups listed in the Indigenous Engagement and Partnership Plan in determining the spatial and temporal boundaries specifically for the social conditions valued component.</p> <p>The Impact Statement should clearly outline all perspectives and input received on spatial and temporal boundaries, including Indigenous and community knowledge, and demonstrate how these were integrated into or contributed to decisions regarding the Project (e.g., project design). If the Proponent determined that some perspectives and input received during engagement activities did not warrant consideration or integration into the decisions regarding the Project, a detailed description of the input and rationale for exclusion must be provided in the Impact Statement.</p> <p>See also comments GC-02, GC-04, and GC-05 above.</p>
SO-03	Section 4.1	Section 5	Required Action # 4: Update the study plan to include the list of the members of the public and public groups that will be engaged, at a minimum the public participants listed in the Public Participation Plan, as part of the baseline data collection and effects assessment analysis. The list should be consistent throughout the study plan.	Considering the Social VCs as presented in Table 9.2, and the study areas presented in Section 6.2, the Municipality of Greenstone is the primary public body that will be engaged with for data collection purposes to support the Social assessments. There are no other public groups (non-indigenous communities) in the LSA expected to experience social impacts from the Project. Other public interests such as land users will be engaged with to support the Land and Resource Use assessment. The study plan for that discipline should be referred to for a list of public interests that will be engaged with.	Section 6, Table 6-1	<p>Required action # 4 was not adequately addressed.</p> <p>As per Section 5 of the Guidelines, the Agency expects the proponent to engage with, at a minimum, the members of the public listed in the Public Participation Plan.</p> <p>Provide a work plan that clearly outlines the approach to engage, at a minimum, members of the public listed in the Public Participation Plan in confirming the spatial and temporal boundaries specifically for the social conditions valued component.</p>

² Refer to complete sections of the Guidelines for more context

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						See also comment GC-04, particularly with respect to the definition of the Local Study Area.
SO-04	Section 4	Sections 5, 6, 7 and 13	<p>Required Action # 5: Provide detail on what baseline information will be sourced from primary information sources, and what will be sourced from secondary information sources so that it is clear where information is being sourced for the criteria and indicators listed in the study plan.</p> <p>Required Action # 6: Regarding primary information collection, the study plan requires additional detail on how the collection methodology would meet the expectations of the Guidelines, including:</p> <ul style="list-style-type: none"> - Describe how Gender-Based Analysis Plus (GBA+) has been applied to the consideration of engagement activities. Identify any specific methods targeted to specific subgroups. - Specify participants in engagement activities (reflecting the Indigenous groups listed in the Indigenous Engagement and Partnership Plan and members of the public listed in the Public Participation Plan) including rationale for how the selection of participants meets the objectives of the study and demonstrates accessibility considerations (e.g. language requirements) and GBA+. - Define who is considered a community consultation coordinator, and how these community consultation coordinators will be identified prior to being approached for engagement. - Describe the approach the proponent intends to take to encourage or attract participation, including how opportunities to participate will be planned and advertised. • Describe how Indigenous knowledge will be used to inform types of engagement activities and participant selection, including the identification of community consultation coordinators. - If sample surveys, interview questions, or other data collection tools exist, identify them in an appendix to the study plan, and provide clear links to how they relate to the social criteria. - Identify past public or Indigenous engagement activities that have taken place and are being used to inform this study plan. <p>Required Action # 7: For secondary information collection, provide specific information sources to be used, and for which criteria and indicators they apply. The study plan should provide a clear outline of which criteria and indicator data will come from existing secondary sources and what those sources are. Provide detail on how the proponent has considered</p>	<p>Sources of baseline information can be found in Appendix A of the Study Plan. Section 7.2.1 and Section 7.2.2 describe which information will be collected from secondary and primary sources, respectively.</p> <p>The primary data collection methodology can be found in Section 7.2.2 of the updated Study Plan. Sections 4.3 and 7.2.2 of the study plan also describe how GBA+ will be incorporated into the Project, including the primary social data collection.</p>	Sections 4.3, 7.2.1, 7.2.2 and Appendix A	<p>Required action # 5 was addressed.</p> <p>Required action # 6 was partially addressed. See also comments GC-01, GC-02, GC-03 and GC-06 above.</p> <p>Required action # 7 was addressed.</p>

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			GBA+ requirements in the identification of secondary information sources.			
SO-05	Sections 3 and 4.1	Section 6.2	Required Action # 8: Describe in the study plan how Indigenous groups will have opportunities to provide Indigenous knowledge and validate the baseline data collected. The description should include the proposed methods for data collection, management of confidentiality, and information storage. This should also include a methodology for tracking information that has been approved by the groups, to demonstrate that guidance outlined in Section 6.2 of the Guidelines has been incorporated into this study plan.	Section 5 of the Study Plan describes how Indigenous Knowledge will be collected and considered in the IS / EA for the Project. Section 2.1 has additional information on the Project's approach to handling confidential information.	Sections 2.1 and 5	Required action # 8 was partially addressed. See comments GC-02, GC-03, and GC-04.
SO-06	Sections 4 and 4.3	Sections 13, 20, 21	Required Action # 9: Update the study plan to demonstrate how GBA+ has been integrated into all aspects of data collection methodology and the assessment of effects and impacts. This should include a description of how the proponent will engage diverse populations to collect information necessary to support the GBA+ analysis and how the information will be tracked, considered and reported in the Impact Statement.	The Social Study Plan will integrate a GBA+ framework into the Social data collection and assessment program.	Section 4.3	Required Action # 9 was partially addressed. See comment GC-06.
SO-07	Section 5.1.2	Sections 5, 6, 7.4	Required Action # 10: Revise the study plan to describe a methodology and engagement approach that will meet the requirements of Sections 5, 6 and 7.4 of the Guidelines. Required Action # 11: Provide further detail on the criteria and the rationale that is used to define the PSA, LSA and Regional Study Area (RSA) for each valued component, and describe how Indigenous groups and the public have been, or will be, provided an opportunity to inform the spatial and temporal boundaries.	- Section 6 of the Study Plan describes the rationale for the temporal and spatial boundaries for the Project. - Section 6.2 of the Study Plan identifies how the PDA (formerly PSA), LSA and RSA have been defined for the Project, including for the Social Environment. Section 6.2.1 of the Study Plan identifies that the study areas can be further refined based on input from neighbouring Indigenous communities and interested persons.	Section 6	Required Actions # 10 and # 11 were partially addressed. See comments GC-01, GC-02 and GC-04. Provide a work plan that clearly outlines the approach to engage Indigenous groups listed in the Indigenous Engagement and Partnership Plan and members of the public listed in the Public Participation Plan in determining the spatial and temporal boundaries specifically for the social conditions valued component.
SO-08	Section 5.1.2	Section 7	Required Action # 12: Update the study plan to define study areas that capture the Project's social effects due to potential changes to environment, health, social and economic conditions.	The LSA and RSA for the Social Environment and the accompanying rationale can be found in Table 6-1 of the Study Plan.	Table 6-1	Required Action # 12 was partially addressed. Section 7.4 of the Guidelines states that the spatial boundaries should vary depending on the valued component and that the proponent should validate with the Agency the spatial boundaries for each valued component. The local study area proposed in the social study plan is very narrow and too geographically linked to the Project's footprint to represent the area of influence and fully capture the potential impacts of the Project on the social conditions valued component. See also GC-02, GC-04, SO-03 and SO-07.
SO-09	Section 5.2	Sections 7, 10 and 17	Required Action # 13: Update Table 3 of the study plan to include detailed criteria and detailed and measurable indicators, and the rationale for the indicators selected to demonstrate how the	A list of Valued Components and Indicators can be found in Table 9-2. This table also includes the rationale for selection and potential sources of information for each indicator.	Table 9-2	The indicators and sub-indicators presented in Table 9-2 do not adequately specify what would be collected and assessed to meet the requirements of Sections 10 and 17 of the Guidelines. Specifically, the sub-indicators identified in Table

Preliminary Comments from the Impact Assessment Agency of Canada on the Draft Socio-community Study Plan submitted on May 22, 2020:						
ID #	Draft Study Plan	Guidelines Section ²	Required Action for Proponent	Proponent Response	Study Plan Reference	Agency Response
			requirements in Section 17 of the Guidelines would be met.			<p>9-2 lack appropriate detail required to provide useful and meaningful information for the effects assessment. For example, the indicator "Community" is associated with the following list of sub-indicators, however, no further information on the sub-indicators is provided:</p> <ul style="list-style-type: none"> • Changes in community well-being • Changes to social cohesion • Changes to family relationships and dynamics • Changes to community participation • Changes to community support networks • Changes to material, Social or mental well-being <p>Update the study plan to provide additional detail to the specific indicators that would be used to meet the requirements of Sections 10 and 17 of the Guidelines. This should include both quantitative and qualitative indicators that are specific, measurable, and accessible to source.</p>
SO-10	Section 5.2	Sections 7, 10 and 17	Required Action # 14: Update the study plan to provide further detail on the specific social criteria and indicators that will be collected and assessed through other study plans. At a minimum, provide a cross reference as to where the specific social criteria and indicators can be found in the other plans.	Table 9-2 outlines for each VC / Indicator the information that will be considered that is to be collected by other disciplines. For example, for the Community Well Being VC, the results of the Economic Assessment and Human Health and Community Safety Assessment will be considered.	Table 9-2	<p>Required action # 14 was partially addressed.</p> <p>See comment SO-09.</p>

Comments from the Federal Review Team on the Marten Falls Community Access Road Project Social Study Plan submitted in June 2021				
ID #	Study Plan Section	Guidelines Section ³	Context	Required Action for the Proponent
SO-11	<p>2.1.3 Health Information</p> <p>“If applicable, a process for handling confidential health information will be developed. This process will conform to Ownership, Control, Access, Possession [OCAP] (First Nations Information Governance Centre 2020) requirements and will also aim to preserve the confidentiality of individual persons providing the information”</p>	<p>Section 6.1</p> <p>“...In all cases, cultural and ethical protocols for the collection, analysis and reporting of information must be respected ...”</p> <p>Section 7.2</p> <p>“...Ethical guidelines and relevant cultural protocols governing research, data collection and confidentiality must be adhered to...”</p>	<p>The social study plan does not indicate explicitly whether the guiding principles of OCAP will be followed to handle confidential and/or health information.</p> <p>OCAP ensures that information about a community is shared with the community and that the community has authority/control over and ownership of the information, however, each individual has a right to privacy and owns their personal information.</p> <p>When gathering personal and/or confidential information, a clear commitment should be made to have the individual health information anonymized (de-identified). It is not enough to state that “<i>the process...will aim to preserve the confidentiality of individual persons providing the information</i>”. Depersonalization of personal health information is a commonly applied standard that must be upheld.</p> <p>It is recommended that the use of OCAP principles be confirmed with each participating Indigenous group, as community-specific protocols or alternative principles, such as CARE⁴ (i.e., Collective benefit, Authority to control, Responsibility, and Ethics), may be preferred by the community.</p>	<p>Adhere to ethical guidelines and relevant cultural protocols governing research, data collection and confidentiality throughout the data collection process, as well as during research, analysis and reporting of information.</p> <p>Provide an opportunity to Indigenous groups to express their preferences regarding ethical guidelines and cultural protocols prior to collect the data.</p> <p>Ensure that the Impact Statement indicates the ethical guidelines and relevant cultural protocols governing research that were followed during the the data collection process, as well as during research, analysis and reporting of information.</p>
SO-12	<p>4.2 Indigenous Communities</p> <p>“The Proponent will provide Project notices and opportunities for consultation and engagement with Indigenous communities identified in Table 4-1, which is inclusive of all Indigenous communities identified in the Indigenous Partnership and Engagement Plan for the Marten Falls Community Access Road Project Impact Assessment (the Agency 2020a) (referred to as the Indigenous Engagement and Partnership Plan).“</p> <p>“Indigenous communities will be provided the opportunity to be involved at critical decision-making points throughout the IS / EA Report so that the Proponent can consider and incorporate, where appropriate Indigenous Knowledge and Indigenous land and resource use information into the Project as it pertains to the existing environment, VCs, effects assessment methods, effects assessment results, and mitigation and follow-up program measures. A variety of activities will be offered so that Indigenous communities are informed of</p>	<p>Section 6.2</p> <p>“...The Impact Statement must also document how the proponent responded to questions, comments and issues raised by Indigenous groups, and how unresolved matters have been addressed. Any proposed mitigation measures are to be clearly linked, to the extent possible, to valued components in the Impact Statement as well as to specific project components or activities. The analysis and responses are to include:</p> <ul style="list-style-type: none"> - a comprehensive list of all issues, questions and comments raised during the engagement activities by each Indigenous group and the proponent’s responses, including how matters have been addressed in the Impact Statement or will be addressed through the impact assessment (including but not limited to avoidance, mitigation or other measures to address potential effects or impacts on the exercise of rights of Indigenous peoples);... ...- if engagement with certain Indigenous groups is not possible, rationale must be provided, including, as applicable, an outline of efforts made;... - where and how Indigenous groups’ knowledge, perspectives and input were integrated into or 	<p>The study plan does not describe how information will be shared with participants that may face barriers to participate rather than be ‘disinterested’ as required by Section 12 of the Guidelines.</p> <p>A description of efforts to engage with individuals or groups that may face barriers to participate should be provided. Certain populations may be less likely to express their views voluntarily, and steps should be taken to remove barriers to ensure their participation.</p>	<p>Describe in the study plan actions taken and to be taken to raise interest in the Project from Indigenous groups who may face barriers to participate in engagement activities.</p> <p>Clarify how information will continue to be shared with participants and Indigenous groups who may face barriers to participate in engagement activities.</p> <p>For the Indigenous groups that do not wish to participate, provide the rationale in an updated study plan and describe the barriers and the efforts made to overcome them, as per Sections 6.2 and 12 of the Guidelines. Include in the Impact Statement detailed descriptions of the Indigenous groups that are being engaged and of those that do not wish to participate.</p>

³ Refer to complete sections of the Guidelines for more context.

⁴ CARE principles are available online at: <https://www.gida-global.org/care>

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ID #	Study Plan Section	Guidelines Section ³	Context	Required Action for the Proponent
	<p>the IS / EA Report as it progresses and are aware of the opportunities, means and timelines to provide their input. The study plans have recognized Indigenous community input received on the Project to date. Indigenous communities will have the opportunity to comment on components of the study plans throughout the IS / EA Report consultation and engagement process.”</p>	<p>contributed to decisions regarding the Project (e.g., project design), including:</p> <ul style="list-style-type: none"> o scoping, development and collection of baseline information; o plans for construction, operation, decommissioning, abandonment, and maintenance; and o follow-up and monitoring. <p>□□where and how Indigenous groups’ knowledge, perspectives and input were integrated in the characterization of the nature of environmental, health, social and economic effects and impacts expected from the Project for each Indigenous group; ...”</p> <p>Section 12 “...If an Indigenous group has chosen not to participate, the proponent should identify the community and provide evidence of efforts to engage... ...Where Indigenous groups do not wish to participate, the proponent is encouraged to continue sharing information and analysis with the Indigenous groups of the potential effects of the Project, and to use available public sources of information to support the assessment....”</p>		
SO-13	<p>4.3 Consideration of Identity and Gender-Based Analysis Plus in Engagement “When feedback is received from interested persons and Indigenous communities, issues, comments and questions will be tracked, which is consistent with the process described in the IS / EA Consultation Plan. Specific to Gender-Based Analysis Plus (GBA Plus) objectives, this will include efforts to engage with diverse populations. It is expected this will include activities specific to subgroups and tabulation of consultation and engagement participation with respect to identity factors. This will provide summary statistics to demonstrate the diversity achieved in consultation and engagement.”</p>	<p>Section 10 “...The information provided must:..</p> <ul style="list-style-type: none"> • describe how community and Indigenous knowledge was used in establishing social baseline conditions, including input from diverse subgroups; • describe baseline social conditions using disaggregated data and gender-statistics for diverse subgroups within the community to support GBA+; and • conduct intersectional gender analysis to examine differences in the status of diverse subgroups (e.g., women, youth, and elders) and their differential access to resources, opportunities and services...” <p>Section 17 “...The proponent must analyze the community and Indigenous knowledge across diverse subgroups where possible to identify differential effects highlighted by these groups including through the application of GBA+. In assessing effects to valued components listed [in Section 17], the analysis should discuss circumstances in a community where diverse subgroups, because of their particular circumstances, could experience adverse effects from the Project more severely than others, or be excluded from potential benefits, including Indigenous peoples or other community relevant subgroups (e.g., women, youth, elders)...”</p>	<p>The study plan outlines opportunities for engagement with neighbouring Indigenous groups and non-Indigenous groups; however, there is no clear indication that this data will be disaggregated as required by Sections 10 and 17 of the Guidelines.</p> <p>Summary statistics will not provide an intersectional gender analysis and will not achieve GBA+ objectives that are needed to ensure diverse and inclusive engagement has occurred, as required by Sections 7.1, 13, 20, and 21 of the Guidelines.</p>	<p>Update the study plan to demonstrate that engagement activities and surveys are designed to collect disaggregated data of diverse groups and subgroups to identify clearly the segments of the population that were/will be consulted and engaged during the preparation of the Impact Statement in order to meet the requirements of Sections 10 and 17 of the Guidelines.</p> <p>See also comment GC-06.</p>

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ID #	Study Plan Section	Guidelines Section ³	Context	Required Action for the Proponent
SO-14	<p>Section 2.1.2 Socio-Primary Data “Social primary data will be presented in a generic manner and referenced appropriately... Confidentiality will be granted upon request to those individuals and information related to the individual, including information which may support Gender-Based Analysis Plus (GBA+), will be redacted from the Social Assessment report.”</p> <p>7.2.2 Primary Data Collection “The Social primary data collection will involve asking questions to fill discipline-specific information gaps. Interviews will be tailored to the specific knowledge holder”</p>	<p>Section 10 “...The information provided must:... - describe baseline social conditions using disaggregated data and gender-statistics for diverse subgroups within the community to support GBA+; and - conduct intersectional gender analysis to examine differences in the status of diverse subgroups (e.g., women, youth, and elders) and their differential access to resources, opportunities and services...”</p> <p>“...Where secondary sources are unable to provide the required information, primary sources such as surveys, key informant interviews, focus groups or other primary research methods should be used...”</p> <p>Section 17 “...The proponent must analyze the community and Indigenous knowledge across diverse subgroups where possible to identify differential effects highlighted by these groups including through the application of GBA+...”</p>	<p>The social study plan does not clearly describe how personal and confidential information will be anonymized and still included in the Impact Statement while not compromising privacy nor confidentiality.</p>	<p>Update the social study plan to include a description of the approach that will be used to ensure that, while protecting confidentiality, relevant GBA+ data will be included in the effects assessment and in the Impact Statement, to meet the requirements of Section 10 and 17 of the Guidelines.</p> <p>Update the social study plan to clarify what is meant by “<i>Social primary data will be presented in a generic manner and referenced appropriately</i>”, particularly in regards to the presentation of social primary data.</p>
SO-15	<p>7.2.2 Primary data collection “...To attract Indigenous community participants to the Social primary data collection program, the MFFN Project Team will work with Community Consultation Coordinators to advertise data collection activities, encourage participation, identify barriers to participation and identify key socio-community knowledge holders. Community Consultation Co-ordinators will also play a key role in the identification of community specific identity factors to be considered in the Social Assessment.</p> <p>GBA+ will be integrated into Social primary data collection activities. Drawing on this analytical framework, the Social primary data collection program will seek to understand the diverse views and perspectives of a range of socio-community knowledge holders. Primary data collection will be inclusive of diverse genders, ages, cultures and other community-specific identity factors that emerge through engagement activities and the Indigenous Knowledge program.”</p>	<p>Section 10 “...The information provided must:... - describe baseline social conditions using disaggregated data and gender-statistics for diverse subgroups within the community to support GBA+; and - conduct intersectional gender analysis to examine differences in the status of diverse subgroups (e.g., women, youth, and elders) and their differential access to resources, opportunities and services...”</p> <p>“...Where secondary sources are unable to provide the required information, primary sources such as surveys, key informant interviews, focus groups or other primary research methods should be used. The collection, analysis and reporting of data must adhere to relevant ethical and cultural protocols...”</p>	<p>The social study plan does not specify how identified sub-groups, that may be differentially impacted by the Project or may require targeted approaches, will be engaged.</p> <p>Data from diverse groups is essential to provide a picture of existing vulnerabilities and protective factors that may create unequal starting points for community members who may benefit from, or be impacted by, the Project.</p> <p>Information regarding the Community Consultation Coordinators’ role is important to understand how the Proponent is approaching community members in ways that are equitable and culturally relevant (e.g., acknowledging the contribution of lived experience and local networks).</p>	<p>Update the social study plan to clarify how primary data collection will include a targeted approach for sub-groups that may be inequitably or differentially impacted by the Project. Provide a description of the proposed approach(es) to address barriers (e.g., accessibility, childcare or other accommodations) for community members to facilitate their participation in the process and to meet the requirements of Section 10 of the Guidelines.</p> <p>Update the social study plan to clarify whether the Community Consultation Coordinators will be selected based on knowledge of community-specific identity factors, or if training will be offered on how to consider diverse identities (e.g., based on gender, age, socio-economic status, etc.).</p>
SO-16	<p>7.2.2 Primary data collection “Data collection methods including interviews, focus groups and surveys designed with respect to cultural norms and the socio-economic situation in a community...”</p>	<p>Section 7.2 “...The Impact Statement must provide <u>detailed</u> descriptions of specific data sources, data collection, sampling, survey and research protocols and methods followed for each baseline environmental, health, social and economic condition that is described, in order to corroborate the validity and accuracy of the baseline information collected....”</p>	<p>The social study plan does not provide enough details to understand whether the approach for sampling, survey and research protocols and methods proposed for the primary data collection will meet the requirements of Sections 7, 10, 13 and 17 of the Guidelines.</p>	<p>Update the social study plan to provide more detail regarding the data collection approach, including how it will achieve results that are representative, inclusive and culturally appropriate, in order to meet the requirements of Sections 7, 10, 13 and 17 of the Guidelines.</p>

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ID #	Study Plan Section	Guidelines Section ³	Context	Required Action for the Proponent
		<p>Section 10 "...The information provided must:</p> <ul style="list-style-type: none"> describe any relevant indicators and how Indigenous knowledge and engagement contributed to defining them;... describe how community and Indigenous knowledge was used in establishing social baseline conditions, including input from diverse subgroups;.." <p>Section 13</p> <p>Section 17 "...Valued components that require assessment are listed below. Indicators should be developed by the proponent using best practice, Agency guidance, and through engagement with Indigenous groups and the public..."</p>	For example, the use of a survey is included as a data collection method but no details are provided about the methodology (e.g., sampling strategy, survey tool used, confidentiality, etc.), if this approach is utilised.	
SO-17	<p>8. Data Management and Analysis "Data management including quality assurance / quality control (QA / QC) will be employed to minimize potential for data entry and analysis errors, prepare data sets for analysis and limit sensitive data distribution in accordance to established agreements. It is expected that there will be a multitude of data issues and limitations based on the Project area. This may include:</p> <ul style="list-style-type: none"> The suppression of data by Statistics Canada due to low population numbers, particularly when disaggregating data related to income and other sensitive factors; The willingness of individuals volunteering to self-identify during the primary data collection program to support disaggregated data reporting; and, Limitations in community-specific research and planning documentation to support all elements of data collection including community-specific studies and specialized plans. <p>The above list is not comprehensive. It is anticipated that additional data issues and limitations may be encountered. Data issues and limitations will be tracked for the duration of the Project and, when possible, addressed with supplementary sources of information..."</p>	<p>Section 2.5 "... The proponent must adhere to the principles of scientific integrity, honesty, objectivity, thoroughness and accuracy..."</p> <p>Section 10 "...Baseline data can often be found in secondary information sources, such as census data, government publications and academic literature. Where secondary sources are unable to provide the required information, primary sources such as surveys, key informant interviews, focus groups or other primary research methods should be used. The collection, analysis and reporting of data must adhere to relevant ethical and cultural protocols..."</p>	While the social study plan indicates that data issues will be tracked and when possible gaps will be supplemented by additional resources, there would be value in describing the various methods and sources of data that are anticipated to be used to ensure the quality of the information and analysis.	Describe in the Impact Statement how data gaps or limitations were addressed with primary data collection or with secondary source information, such as academic research and qualitative and quantitative data on gendered divisions of labour, family, and community responsibility.
SO-18	<p>2. Purpose and Objectives "In conducting the Social Assessment, information from the following other disciplines will be considered: (...) Human Health and</p>	<p>Section 9 "...use a social determinants of health approach to identify and describe the causal chain..."</p>	The valued component "Public Safety" is a social factor. It is recommended that this factor be assessed as part of the social study plan to better align with the overall determinants of health approach in the human health assessment. Human Health valued components (VCs) should focus on the individual level (i.e., biological and behavioral factors), which immediately underlie health outcomes.	

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ID #	Study Plan Section	Guidelines Section ³	Context	Required Action for the Proponent
	Community Safety – Potential changes to health, including public safety, will be considered as part of community well-being.” 9.2 Valued Components and Indicators, Table 9-2: Social Valued Components and Indicators “The Human Health and Community Safety Assessment is expected to include information on public safety.”	Section 16 “... it is important to include interactions within and across the higher-level health determinants (i.e., Level 2, pertaining to material circumstances/ resources and psychosocial factors, and Level 3, pertaining to structural factors and equity factors) in order to identify the pathways of health effects that are most likely to be affected by project-related changes to the determinant(s) of health...”	Including the valued component “Public Safety” in the Human Health Study Plan creates confusion, as the Human Health Assessment, which uses a determinants of health approach, is expected to include information on determinants relevant to public health found in the other assessments.	
SO-19	9. Effects Assessment 9.2 Valued Components and Indicators, Table 9-2: Social Valued Components and Indicators “Valued Component: Community well-being Indicator: Community Sub-indicator: Changes to material, Social or mental well-being”	Section 9 “...use a social determinants of health approach to identify and describe the causal chain...” Section 16 “... it is important to include interactions within and across the higher-level health determinants (i.e., Level 2, pertaining to material circumstances/ resources and psychosocial factors, and Level 3, pertaining to structural factors and equity factors) in order to identify the pathways of health effects that are most likely to be affected by project-related changes to the determinant(s) of health...”	Community well-being may be understood as encompassing both material (resource-related) and social (psychologically-related) well-being. Changes to community well-being may be understood as how the community views changes to their economic, social and/or cultural conditions, whether favourably or unfavourably. Project-related changes to mental well-being arise from the Project’s influences on what matters to the community in regards to the environmental, economic, social and cultural conditions that characterize community well-being. As such, mental well-being should be considered a separate valued component. It is recommended to update the study plan to include the following changes: - Remove “mental” from the valued component: “Community well-being”; Sub-indicator: “Changes to material, or social or mental well-being”; - Add a new valued component and sub-indicator: Valued component: “Mental well-being”; Sub-indicator: “Changes to mental well-being (relative to project-related changes to material or social well-being)”	
SO-20	9.2 Valued Components and Indicators; Table 9-2: Social Valued Components and Indicators Valued component: social wellbeing Indicator: community Sub-indicator: <ul style="list-style-type: none"> Changes in community well-being Changes to Social cohesion Changes to family relationships and dynamics Changes to community participation Changes to community support networks Changes to material, Social or mental well-being Rationale for selection: Community is defined as the presence of Social issues, community cohesion, family relationships, community participation, and community support networks. These components of the socio-community may be altered by the Project including its construction and the access provided during operation.	Sections 10 and 17	Table 9.2 in the social study plan lists the proposed valued components and sub-indicators but does not provide sufficient detail to describe each variable, particularly with respect to how a “change” in the proposed sub-indicators would be identified and measured. The wording “change”, by itself, does not capture what will be evaluated. For example, “changes in community well-being” in itself is not a measurable indicator, and is not specific or clear. In order to understand and evaluate social and community change, the notion of change and its associated impacts, either positive or negative, intended or unintended, need to be detailed. This clarification would help to understand the scope and magnitude of the sub-indicators “change” overall and also among the sub-groups of local and regional population through an intersectional analysis, and offer a systematic approach to the next steps of measurement and monitoring. Furthermore, the social study plan mentions child care as an example of a community service, however, it does not evaluate the potential influence of the Project on early learning / early-years experiences as a result of greater movement into, out of, and through the potentially impacted communities.	Update the social study plan to provide further information on the valued components and sub-indicators listed in Table 9-2 of the social study plan: <ul style="list-style-type: none"> Describe each variable with enough detail to clarify what would be measured and how a change would be identified to provide a detailed description of the potential change and its associated impacts, either positive or negative, intended or unintended. Provide further detail to help with understanding the scope and magnitude of the sub-indicators “change” overall and also among the sub-groups of local and regional population through an intersectional analysis, and offer a systematic approach to the next steps of measurement and monitoring. Update the social study plan to provide further information on community services, including childcare, indicating how the potential influence of the Project on early learning / early-years experiences as a result of greater movement into, out of, and through the potentially impacted communities will be assessed. See also comment SO-09.

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ID #	Study Plan Section	Guidelines Section ³	Context	Required Action for the Proponent
SO-21	<p>9.2 Valued Components and Indicators; Table 9-2: Social Valued Components and Indicators</p> <p>“Changes in community well-being -Changes to Social cohesion -Changes to family relationships and dynamics -Changes to community participation -Changes to community support networks -Changes to material, Social”</p> <p>“Community is defined as the presence of Social issues, community cohesion, family relationships, community participation, and community support networks. These components of the socio-community may be altered by the Project including its construction and the access provided during operation.”</p>	<p>Section 10 “...Community Cohesion: <ul style="list-style-type: none"> ○ basic demographic characteristics of the community; ○ relevant community background and historical experience with similar infrastructure and/or resource development projects; ○ describe the proportion of community members who live in the community year-round; and ○ describe social cohesion or social capital, including factors such as community/ neighbourhood involvement, social networks/support, and social well-being, including inter-community relationships...” Section 17.4</p>	<p>The social study plan does not describe how changes to populations, including changes in social and cultural make-up, and changes to the valued component “social cohesion” with surrounding Indigenous groups would be evaluated for each of the Indigenous groups listed in the Indigenous Engagement and Partnership Plan, as required by Sections 10 and 17.4 of the Guidelines.</p> <p>Furthermore, the social study plan does not describe the approach proposed to evaluate current or new social divisions that might be intensified as a result of the Project, as required by Sections 10 and 17.4 of the Guidelines.</p>	<p>Update the social study plan with a description of how changes to populations, including changes in social and cultural make-up, and changes to the valued component “social cohesion” with surrounding Indigenous groups be evaluated for each of the Indigenous groups listed in the Indigenous Engagement and Partnership Plan, to meet the requirements of Sections 10 and 17.4 of the Guidelines.</p> <p>Update the social study plan with a description of the approach proposed to evaluate current or new social divisions that might be intensified as a result of the Project, to meet the requirements of Sections 10 and 17.4 of the Guidelines.</p>
SO-22	<p>Section 9.2, Table 9-2: Social Valued Components and Indicators</p> <p>Valued component: Housing and accommodation; Indicator: Housing demand Sub-Indicator:</p> <ul style="list-style-type: none"> • Demand for permanent housing • Demand for temporary housing <p><u>Rationale for selection:</u> The migration associated with the Project may affect the demand for housing in the study area. This may include both permanent housing demand and temporary housing demand for non-camp based accommodation to support construction work forces and / or suppliers.</p> <p>Valued component: Housing and accommodation; Indicator: Housing supply Sub-Indicator:</p> <ul style="list-style-type: none"> • Change in provision of housing stock • Change in quality of housing stock • Change in access to housing materials <p><u>Rationale for selection:</u> Increased community access or changes in demographics may alter the ability or necessity to construct accommodation. This may include both permanent and temporary accommodation.</p> <p>Economic Study plan Table 11-1- Study Plan Federal Concordance – Conformance with Requirements; ID4 “Housing pricing, conditions and needs are to be included within the Social Assessment.”</p>	<p>Section 18.2 “The Impact Statement must: - describe the predicted positive and adverse effects to accommodation/lodging, including housing supply, housing costs, and rental rates, both during the construction and operation phases;...”</p>	<p>The social study plan does not provide sufficient information on the approach to socio-economic costs of the anticipated influx of people/ employees in the area that would be associated with the Project being carried out. The approach should include an analysis on where the new accommodations will be, for how long there would be an increased demand, long and short-term impacts on the local population and communities and on their ways of living.</p> <p>For example, there likely would be upward pressure on rental prices with the influx of new employees for the Project and potential newcomers to the area. This could lead to pressures on the availability of affordable housing units due to the change in demographic. Mitigating measures should aim to ensure housing demands and supplies are met during and after the Project to prevent unintended consequences and potentially contributing to displacement or migration of people temporarily or in the long-term.</p> <p>Information should be provided on the existence of social and affordable housing, such as units in housing cooperatives or subsidized units would be helpful to assess housing stock available for lower-income or vulnerable individuals and the quality of housing.</p>	<p>Update the social study plan to provide further detail on the predicted positive and adverse effects to accommodation/lodging, including housing supply, housing costs and rental rates during the construction and operation phases, as required by Section 18.2 of the Guidelines.</p> <p>Include information on where the new accommodations would be, for how long there would be an increased demand, long and short-term impacts on the local population and communities and on their ways of living.</p> <p>Update the social study plan with information on the existence of social and affordable housing, such as units in housing cooperatives or subsidized units to assess housing stock available for lower-income or vulnerable individuals. Information on the quality of housing would be helpful to determine the adequacy of the housing conditions before and after the Project.</p>

Comments from the Federal Review Team on the Marten Falls Community Access Road Project Social Study Plan submitted in June 2021

ID #	Study Plan Section	Guidelines Section ³	Context	Required Action for the Proponent
SO-23	<p>Section 9.2, Table 9-2: Social Valued Components and Indicators</p> <p>Valued component: “Community Services² and Infrastructure, including:</p> <ul style="list-style-type: none"> - Education - Childcare - Water - Waste - Energy - Communications”; <p>Table 11-1 Study Plan Federal Concordance – Conformance with Requirements; ID 16 “All components listed will be covered in the Study Plan except for:</p> <ul style="list-style-type: none"> • Supply and cost of goods and services and existing businesses will be assessed in the Economic Assessment. • Emergency services, health care services and traffic safety will be included in the Human Health and Community Safety Assessment.” 	<p>Section 10 “...To understand the community context, the information provided must describe: ...</p> <ul style="list-style-type: none"> • capacity (currently available or planned) of institutions to deliver public services and infrastructure...” <p>“...The Impact Statement must provide information on the following social conditions:</p> <ul style="list-style-type: none"> • Social Services: <ul style="list-style-type: none"> ○ public services available (e.g., childcare, eldercare, communication services, social and cultural support). • Education: <ul style="list-style-type: none"> ○ education programs including elementary and secondary programs available in the community and the need to access programs outside the community; ○ apprenticeships and training initiatives (e.g., Kiiikenomaga Kikenjigewen Employment & Training Services, Mushkegowuk Council Employment & Training Services, Northern Ontario Internship Program, etc.) ○ traditional education components that could potentially be impacted by the Project. • Housing:... <ul style="list-style-type: none"> ○ overview of the local housing market, including a description of housing conditions and needs, and the general condition of the housing stock....” <p>Section 17.1 “The Impact Statement must:</p> <ul style="list-style-type: none"> • describe the predicted effects to services and infrastructure in the study area, including but not limited to the positive and adverse effects to: <ul style="list-style-type: none"> ○ quality of road infrastructure; ○ Ogoki post airport ○ educational facilities and childcare; ○ health care facilities; ○ recreational and social services facilities; ○ availability and use of fuel to generate power; ○ housing (ownership, cost, affordability, crowding); ○ communication services in the community (including telecommunications infrastructure); ○ transportation within and between communities, and in what forms (e.g., hitchhiking, shared rides, work buses); ○ community amenities (e.g., recreational spaces/services, green spaces); and ○ community governance.” 	<p>Section 10 of the Guidelines requires an understanding of the baseline conditions of each social value component.</p> <p>The social study plan does not provide enough detail on how baseline data will be collected and how sub-indicators will be developed to assess potential impacts of the Project on social services, education, and local housing to meet the requirements of Section 10 of the Guidelines.</p> <p>Section 17.1 of the Guidelines requires information on effects to services and infrastructure, including positive and adverse effects to housing (ownership, cost, affordability, crowding).</p> <p>Section 9.2 of the social study plan only indicates that housing will be approached from a demand and supply perspective but does not provide any further detail on how information on effects to services and infrastructure, including to housing, will be gathered and assessed to meet the requirements of Section 17.1 of the Guidelines.</p>	<p>Update the social study plan to provide further detail on baseline data collection, including a description of data to be collected to assess current capacity of institutions to deliver public services and infrastructure, social services, education and housing, to meet the requirements of Section 10 of the Guidelines.</p> <p>Update the social study plan to provide further detail on how positive and adverse effects of the Project on services and infrastructure, as described in Section 17.1 of the Guidelines, will be assessed.</p> <p>Update the study plan to provide a list of data sources for secondary data for valued components such as public services, education and housing.</p>

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SO-24	Editorial - Footnote 8, Section 9.2 “In February 2020 a regional assessment of the Ring of Fire region commenced; however, it is not sufficiently advanced at this time to inform the Project VCs. The VCs will be consulted and engaged on early in the IA/EA process and finalized taking into consideration the input received. Therefore, only information relevant to the Project that arises from the regional assessment of the Ring of Fire within an appropriate timeline will inform the VCs for the Project.”		The statement in the footnote 8 in Section 9.2 “ <i>In February 2020 a regional assessment of the Ring of Fire region commenced; however, it is not sufficiently advanced at this time to inform the Project VCs.</i> ” is inaccurate, as the Regional Assessment in the Ring of Fire area has not yet begun.	Replace the text in footnote 8 with “ <i>In February 2020, the Minister of Environment and Climate Change determined that a regional assessment will be conducted in an area centred on the Ring of Fire mineral deposits in northern Ontario. Relevant information available in relation to the Regional Assessment in the Ring of Fire area would be considered in the impact assessment of the Project.</i> ”
SO-25		Section 7.3 “...For each of the valued components that will be assessed in the Impact Statement, the proponent must create a study plan and a work plan to be validated by the Agency. Upon receipt of a study plan, the Agency may request that the proponent present and discuss the study plan at technical meetings, which will be scheduled during the impact statement phase.”	In order to meet the requirements of Section 7.3 of the Guidelines, a work plan or work plans for the valued components to be assessed in the Impact Statement must be submitted to the Agency for validation. Since this social study plan does not include content for a work plan, notably this plan does not outline when baseline data will be collected for each Indigenous group (i.e., scheduling, sequencing), the submission of a work plan is an outstanding requirement of the Guidelines.	Provide a work plan that outlines how the social study plan will be executed in the field, including when baseline data will be collected. The work plan should include scheduling and sequencing of engagement activities relative to proposed baseline work, engagement on the study plan, spatial and temporal boundaries determinations, and particularly in relation to collection of Indigenous knowledge. In addition, the work plan should outline when information will be collected for each relevant valued component, including environmental, social, health and economic interests.
SO-26	Table 11-3: Study Plan Federal and Provincial Concordance – Requirement Deviations		Proposed amendments and/or deviations from the Guidelines will not be reviewed or approved during the study plans review process. The Agency will provide guidance on the process to propose amendments and/or deviations to the Guidelines to the project team.	