

Comments from the Federal Review Team on Marten Falls Community Access Road Project Socio-Community Work Plan – December 23, 2022

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/work 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.

Comments from the Federal Review Team on the Marten Falls Community Access Road Project Socio-Community Work Plan submitted in August 2022				
ID #	Work Plan Section	Guidelines Section ¹	Context	Required Action for Proponent
SO-WP-01	<p>Section 2</p> <p>“The approach and the study areas for the Socio-Community are defined in the Social Study Plan (MFFN CAR, 2021), which have been based on discussions held with both federal and provincial regulators.”</p>		<p>Section 2 of the work plan states that the approach and the study areas for the Socio-Community are defined in the Social Study Plan (MFFN CAR, 2021), which are based on discussions held with both federal and provincial regulators. As drafted, this statement gives the impression to readers that the Federal Review Team (FRT) is in agreement with the Socio-Community study plan, including the definition of the study areas. This is incorrect as the FRT provided several comments on the Socio-Community study plan, some of which were not addressed satisfactorily.</p>	<p>Acknowledge that the FRT did not approve the Socio-Community study plan or any portion thereof, such as the study areas.</p> <p>Refer to the feedback provided in the document: “Comments on Marten Falls Community Access Road Social Study Plan” from November 8, 2021, in particular comment GC-01, GC-02 and GC-04.</p>
SO-WP-02	<p>Table 2-1: Socio-Community Gap Analysis/ Population and Demographics/ Demographic change</p> <p>Focus Groups / Interviews with key MFFN and AFN members, which would be administered by community consultation co-ordinators. Community members to include sub-group representatives to meet GBA+ principles. Primary data will also be collected in the Municipality of Greenstone.</p>	<p>Section 6 - Description of Engagement with Indigenous Groups (including 6.1, 6.2, 6.3)</p> <p>Section 7 - Baseline conditions (including 7.4)</p> <p>Section 10 - Baseline conditions – Social</p>	<p>As proposed, the work plan scopes engagement activities and discussions for this item to Aroland First Nation and Marten Falls First Nation, however, additional Indigenous communities could be impacted by demographic changes.</p> <p>In developing the approach to assess potential impacts on social conditions, the Proponent is expected to take into account all social condition concerns (real or perceived) identified by the Indigenous communities listed in the Indigenous Engagement and Partnership Plan (IEPP). Some concerns shared by those communities are presented in the following paragraphs.</p> <p>During the planning phase for the Project, Fort Albany First Nation provided comments about impacts on Indigenous peoples' social conditions, such as access to and demand for technology, demographic changes, quality of life, family structure, youth delinquent issues, child hunger, poverty, elder women and child abuse, xenophobia issues, child rearing responsibilities, single parenting, bush survival skills, loss of elders as teachers of culture/heritage, loss of spirituality, loss of language, loss of culture, urbanization, loss of family homelands, and alteration of social values (Indigenous peoples social conditions section, https://iaac-aeic.gc.ca/050/documents/p80184/137382E.pdf).</p> <p>During the planning phase of the Project, Animiigoo Zaagi'igan Anishinaabek First Nation, Ginoogaming First Nation, Neskantaga First Nation provided comments on 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 people. (Row 101, https://iaac-aeic.gc.ca/050/documents/p80184/137404E.pdf)</p>	<p>Refer to the feedback provided in the document: “Comments on Marten Falls Community Access Road Social Study Plan” from November 8, 2021, in particular comment GC-01, GC-02 and GC-04. Also, address and incorporate in the Impact Statement, the comments posted on the Canadian Impact Assessment Registry Internet site (Reference number 80184), which the Indigenous communities listed in the IEPP had shared with the Agency.</p> <p>Update the approach described in Table 2-1 of the work plan to incorporate comments, input and feedback provided by Indigenous communities listed in the IEPP as per the requirements of the Guidelines. ²In addition to considering comments received to date, the Proponent is expected to continue to ascertain the interest of the Indigenous communities listed in the IEPP throughout the impact assessment process for the Project and adapt the approach accordingly.</p> <p>Furthermore, the Proponent is expected to consider concerns that were received directly (and that the Agency may not have knowledge of) and demonstrate efforts to adapt the approach outlined in study plans and work plans to include additional communities that express concerns or interest at later stages of the development of the Impact Statement.</p>

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

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SO-WP-03	<p>Table 2-1: Socio-Community Gap Analysis/ Transportation / Road Transportation</p> <ul style="list-style-type: none"> - Changes to auto traffic / traffic volumes on existing road connections - Changes to truck traffic / traffic volumes on existing road connections <p>Change will be measured against the increase in traffic volumes within the Project area, including the roads connecting to the proposed Marten Falls access road, such as Painter Lake Road and Anaconda Road.</p>	<p>Section 3.2.2 "...The Impact Statement must describe the anticipated activities during the operation phase of the Project, including: ... - anticipated road use by different users (traffic volume, type of vehicles, maximum weight, etc.), including Indigenous groups, the general public, and mining proponents of reasonably foreseeable future projects (e.g., Eagle's Nest, Blackbird, Black Thor, Black Label, Big Daddy, anticipated future community access roads); - anticipated use of the Anaconda and Painter Lake forestry access roads; ..."</p> <p>Section 6.2 "...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. The analysis and responses are to include: • 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);... • where and how Indigenous groups' knowledge, perspectives and input were integrated into or contributed to decisions regarding the Project (e.g., project design), including: o scoping, development and collection of baseline information; o plans for construction, operation, decommissioning, abandonment, and maintenance; and o follow-up and monitoring."</p>	<p>As proposed, the work plan scopes engagement activities and discussions for this item to Aroland First Nation and Marten Falls First Nation, however, additional Indigenous communities could be impacted by road transportation.</p> <p>In developing the approach to assess potential impacts on social conditions, the Proponent is expected to take into account all social condition concerns (real or perceived) identified by the Indigenous communities listed in the IEPP. Some concerns shared by those communities are presented in the following paragraphs.</p> <p>During the planning phase for the Project, Animbiigoo Zaagi'igan Anishinaabek First Nation, Ginoogaming First Nation provided comments on concern for increased traffic. (Row 104, https://iaac-aeic.gc.ca/050/documents/p80184/137404E.pdf)</p> <p>During the planning phase for the Project, Long Lake #58 First Nation provided comments on the considerations the Proponent needs to take for potential increased traffic accidents as a result of the Project. (Row 2, https://iaac-aeic.gc.ca/050/documents/p80184/137404E.pdf)</p> <p>During the planning phase for the Project, Constance Lake First Nation, Fort Albany First Nation, Long Lake #58 First Nation, Neskantaga First Nation provided comments that shared concerns that the Project would lead to increased traffic in the area and impact historic trails, sites and areas of historic and future (resumed) use. (Row 15, https://www.iaac-aeic.gc.ca/050/documents/p80184/145804E.pdf)</p>	<p>Include in the Impact Statement a social effects assessment for each Indigenous community listed in the IEPP that may experience social-related impacts by the Project and/or that have expressed social conditions-related concerns arising from the Project (direct, indirect, real or perceived), as per the requirements of Sections 6, 10 and 17 of the Guidelines. Refer to the feedback provided in the document: "Comments on Marten Falls Community Access Road Social Study Plan" from November 8, 2021, in particular comment GC-01, GC-02 and GC-04. Also, address and incorporate in the Impact Statement, the comments posted on the Canadian Impact Assessment Registry Internet site (Reference number 80184), which the Indigenous communities listed in the IEPP had shared with the Agency.</p> <p>Update the approach described in Table 2-1 of the work plan to incorporate comments, input and feedback provided by Indigenous communities listed in the IEPP as per the requirements of the Guidelines. In addition to considering comments received to date, the Proponent is expected to continue to ascertain the interest of the Indigenous communities listed in the IEPP throughout the impact assessment process for the Project and adapt the approach accordingly.</p> <p>Furthermore, the Proponent is expected to consider concerns that were received directly (and that the Agency may not have knowledge of) and demonstrate efforts to adapt the approach outlined in study plans and work plans to include additional communities that express concerns or interest at later stages of the development of the Impact Statement.</p>
SO-WP-04	<p>Table 2-1: Socio-Community Gap Analysis/ Community Wellbeing / Nuisance effects</p> <ul style="list-style-type: none"> - Changes in air quality - Changes in noise levels 	<p>Section 6.2 "...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. The analysis and responses are to include:</p>	<p>As proposed, the approach described in Table 2-1 of the Socio-Community work plan does not meet the requirements of Sections 6.2 and 19.1 of the Guidelines.</p> <p>The work plan does not outline how concerns raised by Indigenous communities listed in the IEPP on changes to air quality and on noise levels will be discussed and addressed.</p>	<p>Include in the Impact Statement a social effects assessment for each Indigenous community listed in the IEPP that may experience social-related impacts by the Project and/or that have expressed social conditions-related concerns arising from the Project (direct, indirect, real or perceived), as per the requirements of Sections 6, 10, 13, 17 and 19 of the Guidelines. Refer to the feedback provided in the document: "Comments on Marten Falls Community</p>

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	<p>Changes will be measured against the impacts to air quality and noise within the Project area in relation to existing receptors and sensitive receptors.</p> <p>No interviews</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);... where and how Indigenous groups' knowledge, perspectives and input were integrated into or contributed to decisions regarding the Project (e.g., project design), including: <ul style="list-style-type: none"> scoping, development and collection of baseline information; plans for construction, operation, decommissioning, abandonment, and maintenance; and follow-up and monitoring." <p>Section 19.1 "...The potential effects, to consider assessing include both adverse and positive effects to the current use of land and resources for traditional purposes, physical and cultural heritage, and environmental, health, social and economic conditions of Indigenous peoples impacted by the Project, including interferences of the Project with the following: ... experiences of being on the land, including ability to pass on Indigenous knowledge and language (e.g., impacted from: changes in air quality, noise exposure, effects of vibrations from blasting and other activities)..."</p>	<p>In developing the approach to assess potential impacts on social conditions, the Proponent is expected to take into account all social concerns (real or perceived) identified by any of the Indigenous communities listed in the IEPP. Some concerns shared by those communities are presented in the following paragraphs.</p> <p>During the planning phase of the Project, Animbiigoo Zaagi'igan Anishinaabek First Nation, Aroland First Nation, Fort Albany First Nation provided comments that there may be impacts to air quality as a result of use of diesel generators, construction equipment, an increase in road traffic, dust, and decreased natural cover. (Atmospheric Environment Section, https://iaac-aeic.gc.ca/050/documents/p80184/137382E.pdf)</p> <p>During the planning phase for the Project, Fort Albany First Nation provided comments about reduced air quality, air emissions and dust, as well as atmospheric changes may cause adverse effects on sensitive receptors, such as Indigenous peoples. (Indigenous Peoples Health Conditions, https://iaac-aeic.gc.ca/050/documents/p80184/137382E.pdf)</p> <p>During the planning phase for the Project, Attawapiskat First Nation, Long Lake #58 First Nation provided comments on the need to adequately assess impacts of air quality on human health, wildlife and vegetation as a result of exhaust emissions. Commented that a monitoring program needs to be in place to ensure air quality throughout the life span of the Project. (Row 8, https://iaac-aeic.gc.ca/050/documents/p80184/137404E.pdf)</p> <p>During the planning phase for the Project, Animbiigoo Zaagi'igan Anishinaabek Aroland First Nation provided comments regarding their concerns 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. (Row 147, https://iaac-aeic.gc.ca/050/documents/p80184/137404E.pdf)</p>	<p>Access Road Social Study Plan" from November 8, 2021, in particular comment GC-01, GC-02 and GC-04. Also, address and incorporate in the Impact Statement, the comments posted on the Canadian Impact Assessment Registry Internet site (Reference number 80184), which the Indigenous communities listed in the IEPP had shared with the Agency.</p> <p>Update the approach described in Table 2-1 of the work plan to incorporate comments, input and feedback provided by Indigenous communities listed in the IEPP as per the requirements of the Guidelines. In addition to considering comments received to date, the Proponent is expected to continue to ascertain the interest of the Indigenous communities listed in the IEPP throughout the impact assessment process for the Project and adapt the approach accordingly.</p> <p>Furthermore, the Proponent is expected to consider concerns that were received directly (and that the Agency may not have knowledge of) and demonstrate efforts to adapt the approach outlined in study plans and work plans to include additional communities that express concerns or interest at later stages of the development of the Impact Statement.</p>
SO-WP-05	<p>Table 2-1: Socio-Community Gap Analysis/ Community Wellbeing / Community</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 wellbeing 	<p>Section 9 "...The information provided must: - describe any context-specific definitions of health and well-being, including from the perspective of the relevant Indigenous cultures, including community and spiritual wellbeing; - Complete a community health profile that describes the overall health of the community which may include information on birth rates, death rates, communicable diseases including sexually transmitted infections, injuries, chronic disease rates, and mental</p>	<p>As proposed, the work plan scopes engagement activities and discussions for this item to Aroland First Nation and Marten Falls First Nation, however, additional Indigenous communities have expressed or might experience impacts to their community wellbeing, including social cohesion.</p> <p>In developing the approach to assess potential impacts on social conditions, the Proponent is expected to take into account all social condition concerns (real or perceived) identified by the Indigenous communities listed in the IEPP. Some concerns shared by those communities are presented in the following paragraphs.</p>	<p>Include in the Impact Statement a social effects assessment for each Indigenous community listed in the IEPP that may experience social-related impacts by the Project and/or that have expressed social conditions-related concerns arising from the Project (direct, indirect, real or perceived), as per the requirements of Sections 6, 9, 10, 13, 17 and 19 of the Guidelines. Refer to the feedback provided in the document: "Comments on Marten Falls Community Access Road Social Study Plan" from November 8, 2021. Also, address and incorporate in the Impact Statement, the comments posted on the Canadian Impact Assessment Registry Internet site (Reference</p>

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	<p>Focus Groups / Interviews / surveys with key MFFN and AFN members, which would be administered by community consultation coordinators. Community members to include sub-group representatives to meet GBA+ principles.</p> <p>Key contact interviews: - Band Administration staff - Community member representatives - Indigenous Services Canada representatives - Ontario Ministry of Indigenous Affairs</p>	<p>health and well-being (e.g., diet, substance use, physical activity) and other community-relevant information (e.g., existing communal activities, support networks and cultural/spiritual practices that may contribute to community resilience), where available through secondary information sources...”</p> <p>Section 17.4 “...The Impact Statement must assess potential changes to local demographic conditions, including changes to population size and changes in the relative population of men and women, and younger and older people. The Impact Statement must: • describe in-and out-migration effects, including changes in social and cultural make-up of affected communities and changes in populations; and • identify whether social divisions might be intensified as a result of the Project and evaluate effects to social cohesion, both between the project community and other surrounding First Nations...”</p>	<p>During the planning phase for the Project, Neskantaga First nation provided comments on the importance of the familial structures that exists amongst the First Nation communities in the Project area. It is important to maintain unity amongst Indigenous communities to ensure healthy relationships (Indigenous peoples social conditions section, https://iaac-aeic.gc.ca/050/documents/p80184/137382E.pdf)</p> <p>During the planning phase for the Project, Aroland First Nation, Fort Albany First Nation, Neskantaga First Nation provided comments about ...accessibility to health-care services, as well as, mental health, issues of self-esteem, and spiritual health (Indigenous Peoples Health Conditions Section, https://iaac-aeic.gc.ca/050/documents/p80184/137382E.pdf)</p> <p>During the planning phase of the Project, Animiigoo Zaagi'igan Anishinaabek First Nation, Ginoogaming First Nation, Neskantaga First Nation provided comments on 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 people. (Row 101, https://iaac-aeic.gc.ca/050/documents/p80184/137404E.pdf)</p> <p>During the project planning phase, Neskantaga First Nation provided comments, asking how the Proponent will study baseline conditions for well-being and apply mitigation measures (Row 102, https://iaac-aeic.gc.ca/050/documents/p80184/137404E.pdf)</p> <p>During the project planning phase, Aroland First Nation, Ginoogaming First Nation, Neskantaga First Nation provided comments that Indigenous groups are experiencing social crisis, such as suicides, drug and alcohol abuse, and familial breakdowns. 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. (Row 111, https://iaac-aeic.gc.ca/050/documents/p80184/137404E.pdf)</p>	<p>number 80184), which the Indigenous communities listed in the IEPP had shared with the Agency.</p> <p>Update the approach described in Table 2-1 of the work plan to incorporate comments, input and feedback provided by Indigenous communities listed in the IEPP as per the requirements of the Guidelines. In addition to considering comments received to date, the Proponent is expected to continue to ascertain the interest of the Indigenous communities listed in the IEPP throughout the impact assessment process for the Project and adapt the approach accordingly.</p> <p>Furthermore, the Proponent is expected to consider concerns that were received directly (and that the Agency may not have knowledge of) and demonstrate efforts to adapt the approach outlined in study plans and work plans to include additional communities that express concerns or interest at later stages of the development of the Impact Statement.</p>
SO-WP-06	Editorial: Figure 2-1: Socio-Community Study Areas		The legend of Figure 2-1 identifies four alternatives, however, the map only shows two.	Update Figure 2-1 to correct the inconsistency between the map and its legend.
SO-WP-07	Editorial		Ensure that pdf documents submitted to the Agency contain bookmarks and have the bookmark panel active.	
SO-WP-08	Editorial		The term “GBA Plus” should be used instead of “GBA+”. The plus sign is no longer used; rather, it is spelled out to emphasize the intersectional design and approach of GBA Plus and for accessibility purposes.	