



## **RING OF FIRE - REQUEST FOR EXPERT INFORMATION**

### **Transport Canada's Response to the Ring of Fire Regional Assessment Working Group – November 28, 2025**

#### **Topic: Projects and Initiatives Relevant for the Ring of Fire Area**

##### **Request:**

Provide a list of the projects and initiatives in which you are involved in that relate to the Ring of Fire Assessment Area.

##### **Response:**

Transport Canada's Airport Capital Assistance Program (ACAP) provides funding for essential projects to small local and regional airports, including some in the Ring of Fire assessment area. Most recently, Moosonee Airport was provided with funding in 2025/26 for airfield electrical and lighting system upgrades.

Past ACAP projects have included:

Moosonee Airport: Funding in 2023 for the purchase of a grader to be used in the removal and control of snow and ice on airside surfaces such as runways, taxiways and aprons.

Webequie Airport: Funding in 2019 for the replacement of the edge lights on the main runway, taxiway and apron, as well as various other electrical system rehabilitation projects such as new electrical cabling and a new lighting control panel.

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#### **Topic: River systems – Scale of studies, existing information and gaps**

##### **Request:**

The Working Group is interested in baseline studies and analyses of potential impacts at a river-system scale related to geochemistry, hydrogeology, hydrology, water quality and quantity, fish and aquatic wildlife, and navigability.

- a. Identify existing studies at the spatial scale of the major river systems in the Ring of Fire Assessment Area, i.e.: Abitibi River, Attawapiskat River, Ekwan River, Kenogami River, Mattagami River, Missinabi River, Moose River, the Lower and Upper Albany Rivers, and the Winisk River.

- b. If this information does not exist, advise on how it would be possible to obtain portraits of these river systems, including if there are plans underway to conduct these studies.
- c. Based on your experience in project-level impact assessments, advise whether there are standard mitigation measures that may be applicable to protect the water systems in the Ring of Fire assessment area from potential impacts for development activities in general.
- d. Include a discussion of the key sources of uncertainty unique to this assessment area related to the effectiveness of these measures, and what your role might be in reducing these uncertainties.

**Response:**

- a) Transport Canada's Navigation Protection program (NPP) is not normally responsible for conducting or obtaining spatial scale studies of major river systems. Accordingly, NPP does not have any existing studies of the major river systems in the Ring of Fire Assessment Area. The only Scheduled waterway in the Study Area currently listed under the *Canadian Navigable Waters Act* (CNWA) is James Bay.
  - b) Environmental surveying or engineering firms with the appropriate specialization may be able to generate spatial-scale studies of specific river systems.
  - c) There are no standard mitigation measures applicable to projects subject to the CNWA. While specific terms and conditions are dependent on the final design, general mitigation measures can be expected as conditions that will manage impacts to navigation. Examples include:
    - removing all temporary works from the waterway upon completion of the project,
    - maintaining an existing portage route,
    - ensuring bridges provide adequate horizontal and vertical clearance to maintain unobstructed navigation.
  - d) Once the proponents develop project proposals, NPP can offer pre-submission services ahead of design-selection. CNWA processes apply in the site specific or local context.
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**Topic: Development Scenarios**

**Request:**

- a. Provide a description of the existing or planned development activities under Transport Canada's jurisdiction in the assessment area.

- b. Advise on the development activities you anticipate may occur in the assessment area for different development sectors and intensities, this should include scenarios related to railways, roads, seaports and marine terminals, airports, etc.

**Response:**

Transport Canada is aware there have been discussions regarding the potential for rail and marine infrastructure in the assessment area to support the Ring of Fire development, but to our knowledge, there are currently no specific proposals in this regard.

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**Topic: Feasibility of development in this area**

**Request:**

Based on the sensitivity of peatlands in the assessment area and their role in global carbon sequestration, as well as the challenges related to building infrastructure on peatlands, the Working Group requests that you:

- a. Provide a summary of the state of knowledge regarding the sustainability of building on peatlands.
- b. Advise on the worst-case scenarios that have been explored for impacts of future development on the ecosystems of the Hudson Bay Lowlands, including but not limited to impacts on carbon storage.
- c. Explain how sensitive the ecosystems in the assessment area are to climate change and explain whether there has been research done on the interactions between climate change and potential development for this area.
- d. Describe all innovative approaches being explored and invested in by Canada to enable development in the assessment area, across all possible sectors, beyond mining.

**Response:**

**Potential Rail Development:**

If development of the area eventually leads to the construction of a railway line of more than 3 km outside a right of way, then approvals from the Canadian Transportation Agency under section 98 would be necessary. If the proposed railway line is over 50 km, then a review under the *Impact Assessment Act* would be triggered. Regarding construction of track over peatlands, that environment does pose some challenges, but they are not insurmountable. Canada has existing track in similar ecosystems. However, it may be advisable to consult with the Railway Association of Canada. In addition, depending on the type of goods that are moved by train, additional consultations under the *Transportation of Dangerous Goods Act* may be required.

This would be based on the type of material produced/and whether materials are being moved by rail pre or post processing.

### **Potential Marine Terminal Development in James Bay:**

If a marine terminal were constructed in James Bay, Transport Canada's Marine Security requirements (Part 3 of the *Marine Transportation Security Regulations*) would be applicable. This includes the operator appointing a qualified Marine Facility Security Officer (MFSO) and having an approved Marine Facility Security Plan. In addition, if a marine terminal were built in James Bay, the *Ballast Water Regulations* would apply to any vessels calling at the port.

If the terminal handled oil in bulk, it would also meet the definition of an Oil Handling Facility (OHF) under the *Canada Shipping Act, 2001* (CSA 2001) and *Environmental Response Regulations* (ERR). OHF status triggers additional regulatory requirements including advance Ministerial notification ( $\geq 180$  days), submission of Oil Pollution Prevention and Emergency Plans ( $\geq 90$  days prior), an arrangement with an approved Response Organization (RO) for covered oil quantities and planning to meet RO response-time expectations.

### **Economic and Transportation Analysis:**

Transport Canada does not currently have good visibility on the movement of goods in the Ring of Fire area given the limited movements to be measured at this point (i.e., truck movements to and from this part of Northern Ontario). In addition, there are currently no railways within the Regional Study area. The closest railway is Ontario Northland Railway, a class II railway, which does not submit data to Transport Canada. We also note, the existing harbors along James Bay do not report information on commodities handled to Transport Canada.

Transport Canada's modelling estimates that there are significant export opportunities for metals and minerals to Asia and Europe. Moving these commodities to tide waters for export of raw metals and minerals would require the construction of road and rail connecting the existing network in the south (linking for example the port of Thunder Bay) to James Bay (this would require the construction of appropriate port facilities) or to the port of Churchill. *The viability of building port infrastructure along James Bay is not currently demonstrated.* However, Transport Canada is currently analyzing the economic viability of shipping commodities through the port of Churchill considering rail and marine costs versus other existing gateways. The conclusion of this analysis in the future could potentially further inform the viability of building port infrastructure along James Bay. Transport Canada's understanding is that the government of Ontario has indicated it would prefer the mining products to be processed in Canada instead of being shipped in its raw form overseas. In this case, the need for Port facilities in James Bay would become less of a priority.

### **Legislative and Regulatory Oversight:**

Transport Canada oversees marine safety in Canada primarily through the *Canada Shipping Act, 2001 (CSA)*, which sets the legal framework for vessel safety, crew certification, pollution prevention, and small and commercial-vessel operations. This is complemented by associated legislation, including the *Marine Transportation Security Act* for port and vessel security, the *Pilotage Act* for safe navigation in hazardous waters, the *Marine Liability Act* for compensation and insurance, and the *Canada Marine Act* for port governance. These laws establish standards, regulations, and enforcement mechanisms to protect lives, the environment, and marine infrastructure, while aligning with international maritime conventions. Transport Canada enforces compliance through inspections, risk-based oversight, and administrative penalties, emphasizing safety, environmental protection, and security across Canada's navigable waters

### **Navigation Safety Assessment Process for project proposals subject to the IAA:**

In addition, projects subject to the Impact Assessment Act, such as a new port terminal development, may be required to undergo an Enhanced Navigation Safety Assessment Process (NSAP) led by Transport Canada with federal and other jurisdictional partners including Indigenous Nations. NSAP is designed to promote a culture of safety across Canada's marine sector by increasing awareness of regulatory requirements, safe practices, and risk management. Its purpose is to educate vessel operators, crew, and industry stakeholders on compliance with the *Canada Shipping Act, 2001* and related marine legislation, while encouraging proactive safety behaviors that prevent accidents, injuries, and environmental incidents. By combining outreach, training, and communication initiatives, the NSAP helps reduce operational risks, supports enforcement efforts, and fosters a shared responsibility for marine safety and environmental protection throughout Canadian waters.

