

SUMMARY OF ISSUES – Northern Road Link Project

This document provides a high-level summary of issues submitted to the Impact Assessment Agency of Canada (the Agency) about the Northern Road Link Project (the Project) during the comment period on the Summary of the Initial Project Description, submitted by Marten Falls First Nation and Webequie First Nation (jointly, the Proponent). The issues highlight information that support decision making by the Agency on whether an impact assessment is required under section 16 of the *Impact Assessment Act* and — if an assessment is required — inform the tailoring of planning phase documents. Original submissions from the participants are available online, on the Canadian Impact Assessment Registry Internet site for the Project (Reference Number 84331).

The Proponent must provide the Agency with their response to the Summary of Issues that details how they intend to address the issues and the Detailed Project Description. The Detailed Project Description must contain the information from the Initial Project Description with new information integrated throughout the main body of the document as appropriate to respond to the issues raised. Similarly, the Summary of the Detailed Project Description should contain the information from the Summary of the Initial Project Description, updated with new information. This will facilitate understanding by assessment participants, including Indigenous and public groups, federal authorities, provincial ministries and municipalities.

Fish and Fish Habitat
Request for information about potential watercourse crossing locations, known fish species distribution, and proposed mitigation
Request for further information on the changes to the movement and dispersion of fish populations, spawning and reproductive behaviour, due to construction and operation activities, including construction of watercourse crossings.
Need for further information on effects to fish and fish habitat from changes to water quality, increased fishing activity, borehole drilling near rivers, runoff from roads, and contamination from gas, oil, road salt and hazardous waste pollutants.
Concerns about potential effects on fish and fish habitat during all project phases, including: <ul style="list-style-type: none"> – death or harm to fish, including from the temporary relocation of fish; – alteration, disruption, fragmentation or destruction of fish habitat, including spawning habitat; – changes to water quality, quantity and flow; and – obstruction of fish passages from in-water works during construction and maintenance of watercourse crossings and culverts, and filling in wetlands and other waterbodies.
Comments about lake sturgeon gathering in spring spawning aggregations in fast flowing water at locations favoured for road construction across rivers. This would increase the accessibility of spawning lake sturgeon to fishers, and increase the vulnerability of lake sturgeon to potentially unsustainable population levels due to harvesting pressure.
Migratory Birds, Other Birds and Their Habitats
Request for additional information on the potential effects on birds, including federally-listed species at risk, migratory birds and species of importance to Indigenous communities (e.g., eagles, geese, ruffed grouse, spruce grouse), and their habitats (including nesting sites), during all project phases, including disturbance or mortality from: <ul style="list-style-type: none"> – habitat loss, alteration or fragmentation; – site alteration and vegetation clearing; – introduction of invasive species, parasites and diseases to the region; – traffic; – construction and maintenance activities, including winter de-icing; – accidents and spills; – air emissions;

<ul style="list-style-type: none"> - noise levels; and - light pollution.
Request for additional information on the potential effects to migratory patterns and corridors of birds (e.g., geese and other migratory birds) due to impacts to important habitats, such as wetlands, eskers and islands in the muskeg lakes, which represent habitat for nesting and breeding.
Request for information on the potential presence of any species on Schedule 1 of the <i>Migratory Birds Regulations, 2022</i> , that may breed in the project area.
Request for additional information on mitigation measures proposed to avoid mortality and disturbance of birds, particularly with respect to light pollution, increased noise, and accidents and spills.
Species at Risk, Terrestrial Wildlife and Their Habitats
Request for information on baseline data collection on federally listed species at risk and COSEWIC-listed species ¹ , including wolverine, lake sturgeon, caribou (Boreal and Eastern Migratory populations of migratory and sedentary ecotypes, and notably the Missisa Range), golden eagles, little brown myotis, northern myotis and tricolored bat.
Request for more information on potential impacts on species at risk (including individual mortality) and their habitats, resulting from: <ul style="list-style-type: none"> - changes to home range and migration/movement patterns; - habitat alteration and fragmentation (which can lead to difficulty finding food, mates and suitable habitat); - loss or reduction of upland habitats, such as eskers and bat roosting habitat; - peatland dewatering; - aggregates pits and quarries near eskers; - potential changes to water and air quality; - increased pollution; - vehicular collisions; and - increased human access for recreational activities.
Concerns about potential effects on caribou populations (Boreal and Eastern Migratory) including population stress, impacts on migration patterns and habitat fragmentation from linear infrastructure, as well as cumulative effects from future foreseeable projects.
Concerns about the residual effects to individual, local or regional populations of species at risk and their habitat.
Request for information on potential effects on wildlife populations from: <ul style="list-style-type: none"> - mortality, including from vehicular collisions, as increased mortality may lead to population decline and impacts on genetic diversity (especially for large mammals, such as ungulates); - sensory disturbances from project activities or components, over the life of the Project that may lead to the spread of white-nose syndrome in bats, and other disturbances such as noise effects from road traffic or blasting; - changes to migration patterns; - increased public access, including access for recreational hunting; and - loss, alteration or fragmentation of habitats (including wetlands and upland habitats).
Commented that the transition zone between the James Bay Lowlands and the Ontario Shield is a critical area for species with larger habitat ranges.
Need for information on potential effects from changes to forested land (e.g., impacts to species of importance to Indigenous communities) and clarity on the mitigation measures proposed to minimize adverse effects.
Concerns about potential effects on forests from vegetation clearing, edge effects, and changes to hydrology and soil (e.g., quality, loss, compaction and erosion).

¹ COSEWIC stands for Committee on the Status of Endangered Wildlife in Canada, an independent advisory panel to the Minister of Environment and Climate Change that assesses the national status of wildlife species at risk of extinction.

Concerns about potential effects on native and rare vegetation due to dust from project activities (including road use), the application of herbicides during all project phases and from the introduction of invasive plant species.
Climate Change and Greenhouse Gas Emissions
Need for additional information on all sources of greenhouse gas emissions associated with the Project and on the methods to estimate them, to demonstrate how the requirements of the latest Strategic Assessment of Climate Change guidance document would be met.
Need for further information about the project-related effects from land use change and loss or disruption of carbon storage function, including: <ul style="list-style-type: none"> - quantification of net greenhouse gas emissions, including from impacts on above-ground and below-ground carbon stocks in the boreal forests, soils, and peatlands; - hydrological assessment of how impacts to wetlands (including peatlands and muskeg) would influence both carbon stocks and the ability to continue to sequester carbon into the future; - proposed mitigation measures to minimize loss of carbon storage function, greenhouse gas emissions and effects to climate change; and - implications of the Project to Canada's national greenhouse gas inventory.
Indigenous Peoples' Spiritual, Physical, and Cultural Heritage
Concerns about the potential effects to Indigenous cultural heritage, practices and ways of life, including the right to self-govern and speak traditional languages, due to project activities and the increased traffic for industrial and public-access purposes.
Concerns about potential effects to waterways, including features such as rapids, and landforms of cultural importance and the way of life of local Indigenous communities, including due to: <ul style="list-style-type: none"> - proposed watercourse crossings (particularly on the Attawapiskat River) - geotechnical and borehole drilling on eskers, and changes to the land.
Concerns about potential impacts to cultural, spiritual and sacred sites, from potential project-related changes to the watershed and muskeg.
Concerns about potential impacts to Indigenous communities and their ability to preserve and transfer their traditional and cultural knowledge to future generations.
Indigenous Peoples' Current Use of Lands and Resources for Traditional Purposes
Request for information about the plans for re-purposing cleared materials such as vegetation, including trees and plants used for traditional medicines.
Concerns about the potential effects on hunting, trapping, fishing, gathering, and spiritual practices and cultural teachings, including: <ul style="list-style-type: none"> - changes to the current use of traditional lands, waterbodies, and areas of historical importance to Indigenous communities; - ease of access by non-Indigenous peoples to Indigenous traditional territories; - loss of access to traditional lands (e.g., from potential changes to navigability, the Project overprinting traditional territories); and - changes to the way of life and traditional use of land by future generations.
Country Foods
Request for the development or support of a dietary and food security survey, including a traditional food harvesting study for Indigenous communities whose access would be affected, to determine potential food security issues and impacts to the health of community members.
Concerns about effects on the access, quality and availability of country foods, including wildlife (such as caribou), plants and traditional medicines.
Concerns about the potential effects on human health from consuming country food contaminated through soil and water, including from increased mercury methylation processes in wetlands, stemming from project activities.

Structures, Sites, Things of Historical, Archaeological, Paleontological, or Architectural Significance to Indigenous Peoples
Request for the Proponent to determine the location of any structure, site or things of historical, archaeological, paleontological, or architectural significance in consultation with Indigenous communities.
Request for the Proponent to complete an archeological assessment.
Indigenous Peoples' Exercise of Aboriginal and/or Treaty Rights
See sections on Current Use of Lands and Resources for Traditional Purposes; Human Health and Well-being; and Spiritual, Physical and Cultural Heritage.
Comment that the Detailed Project Description should state explicitly all Indigenous peoples engaged by the Proponent have rights under section 35 of the <i>Constitution Act, 1982</i> , not just the Proponent communities, and should list all Indigenous communities in a non-hierarchical format.
Indigenous Knowledge
Concerns about the Proponent not incorporating Indigenous Knowledge into planning, management, and operational decisions, as well as during environmental data collection, within monitoring studies and when identifying mitigation measures related to environmental, social, economic and health impacts stemming from the Project and other activities or potential developments.
Concerns with how the Proponent would ensure the privacy and confidentiality of shared Indigenous Knowledge and other information deemed sensitive.
Indigenous and Stakeholder Engagement and Consultation
Commented that First Nation communities are eligible for Economic Development and Infrastructure Funding.
Concerns about Indigenous communities being adequately supported to participate in engagement and consultation activities throughout the federal impact assessment process, including by: <ul style="list-style-type: none"> – having access to sufficient and timely capacity funding; – being provided with sufficient time to provide comments; and – being shown consideration for the challenges Indigenous communities face, such as community emergencies, poor bandwidth and consultation fatigue.
Concerns about adequate support being provided to Indigenous communities to conduct studies on the use of lands and resources to inform the federal impact assessment process.
Request that engagement activities be conducted respectfully of Indigenous protocols by incorporating: <ul style="list-style-type: none"> – any existing Consultation and/or Engagement Protocols that Indigenous communities have shared with the Proponent; and – individual Indigenous community's preferences for engagement and consultation throughout the assessment process, including language preferences and health and safety measures that should be followed.
Request that in-person engagement activities be offered at multiple locations, on multiple dates, in each of the surrounding communities that would be impacted by the Project.
Request for involvement of, and transparent information sharing with, Indigenous communities (particularly with knowledge holders and youth) regarding baseline data collection (e.g., archeological baseline studies), spatial boundaries and study areas, and other project-related information used to inform the federal impact assessment process.
Request for the Proponent to share baseline data and project-related information with potentially impacted Indigenous communities, particularly regarding wildlife matters of importance to the communities (such as caribou and the collaring program), to increase understanding and trust of the approach used, collect input from the communities and comply with Ownership, Control, Access and Possession principles.
Concerns about how Indigenous customs would be considered, including worldviews and laws, to inform decisions made about the Project.

Comments about the importance of establishing and maintaining good relationships and a unified approach to consultation between Indigenous communities in the region, whether they support or oppose development in the Ring of Fire area.
Request for the adequate involvement of potentially impacted Indigenous communities throughout the federal impact assessment process, including in the determination of the project definition and spatial and temporal boundaries, the selection of valued components and mitigation measures, the validation that concerns raised have been substantially addressed, and in shared decision-making.
Comments about meaningful and ongoing Proponent-led engagement with off-reserve and on-reserve members of Indigenous communities, including the community leadership, in a manner that enables full and free participation.
Need for meaningful Indigenous consultation and Proponent-led engagement throughout the federal impact assessment process (including during the definition of project design and spatial and temporal boundaries), that takes into consideration Indigenous Knowledge, the capacity of Indigenous communities and the traditional land and resource uses of potentially impacted Indigenous communities, and allows for verification of how input from Indigenous communities are reflected in documents prepared for the assessment process.
Need for all engagement activities to be meaningful that encourages participation from Indigenous communities through two-way communication, in order to gather input that informs the Proponent's conduct in the federal impact assessment. Examples of meaningful engagement include: <ul style="list-style-type: none"> – in-community meetings where oral information can be submitted; – allowing for participants to lead engagement sessions to share information; – providing clarity on how information, including Indigenous Knowledge, can be shared, and how it would be used to ensure it is not reworded or misrepresented; – incorporating views from Indigenous communities on the use of studies conducted by the communities; and – incorporating views on the project alternatives.
Need for the Detailed Project Description to include information on the Proponent's engagement with Indigenous communities up to the submission of the Detailed Project Description, including any issues raised by Indigenous communities, as required in Schedule 2 of the <i>Information and Management of Time Limits Regulations</i> . Information in Appendix E of the Initial Project Description only covers engagement activities that took place up to April 2022.
Need for the Detailed Project Description to include information on the Proponent's schedule for future engagement with Indigenous communities.
Request for the Detailed Project Description to include "self-determined" and "consensual" in the list of guiding principles for engagement with Indigenous communities.
Comments on the Proponent's approach to engagement, including that engagement activities should consider barriers to participation for local, underrepresented groups.
Comment that the Proponent should have specific workshops and feedback sessions for Indigenous women, girls, and gender diverse individuals, and offer child-care onsite for individuals who have children and want to attend in-person.
Health Conditions of Indigenous and Non-Indigenous Peoples
Concerns about potential effects from biophysical pathways of exposure such as: <ul style="list-style-type: none"> – changes to air quality from vehicular emissions and dust, which can cause adverse impacts on human health; – effects on quality and quantity of drinking water; and – changes to country food quality caused by air, soil or water contaminants, including carcinogens, heavy metals (e.g., chromium, mercury) and other toxic substances released by project activities (e.g., aggregate sourcing, vehicle emissions), potential accidents and reasonably foreseeable projects in the area.

Request for information on indicators related to baseline health conditions in the area, to assess the Project's potential effects to a range of health determinants, including socio-economic conditions and the potential impact to the health and well-being of Indigenous communities.
Concerns about the lack of information used in the problem formulation exercise of the Human Health Risk Assessment, including the identification of all potentially consumed country food species and human receptors.
Request for information on the scenarios considered by the Proponent for potential accidents and malfunctions in the Human Health Risk Assessment, as well as on the proposed emergency responses.
Concerns that the Proponent has not considered an adaptive mitigation/management plan that would provide a timely response, if country food or water quality were impacted due to project activities and/or accidents.
Request for information on the potential effects on human health and well-being and to social determinants of health from the influx of workers and the potential increase in cost of living and stress on available social services and health care, as well as from increased vehicular collisions.
Social and Economic Conditions of Indigenous and Non-Indigenous Peoples
Concerns about potential impacts to Indigenous peoples' economic conditions, including changes to the social assistance rate of Indigenous communities, which would no longer be considered remote after connecting to the provincial highway network through the Project.
Concerns about the potential effects to species that are of socio-economic importance to Indigenous communities, including moose, caribou, beaver, muskrat, hare, ruffed grouse, spruce grouse, lake sturgeon, pickerel, whitefish, pike, burbot, geese, ducks, as well as vegetation and medicinal plants.
Comment regarding the spur roads, which may change the remoteness classification of Indigenous communities. This may improve conditions and decrease social issues by providing reliable and regular transportation to Indigenous communities.
Request for a cost-benefit analysis of Indigenous communities' costs associated with transportation and spoilage of goods due to the current winter road, and the potential for future saving opportunities that would be realized through the Project.
Request for further information on employment opportunities for members of Indigenous communities.
Request for information on potential impacts to social conditions and social well-being (including on familial relationships), due to changes in quality of life, urbanization, increased connectivity, alteration of social values and increased mobility.
Comments that the Proponent should engage with potentially impacted Indigenous communities to identify opportunities to enhance the positive effects of the Project, including training and employment opportunities, social assistance and wage subsidies.
Request for information on the potential effects on social conditions, including community services and infrastructure, community safety, cultural continuity and well-being, because of potential increase in access to drugs.
Request for information on profiles of Indigenous communities, including demographic characteristics, to allow for a greater understanding of the existing conditions.
Concerns about potential economic impacts on local businesses (including tourism) due to project activities that would cause changes in scenic viewscapes, as well as potential economic disruptions to municipalities, local agencies, and provincial systems.
Request for further information on the existing local and regional economy to assess the potential impacts of the Project, including: <ul style="list-style-type: none"> – information on how workers would be hired locally, nationally or internationally; – the number and types of jobs the Project would create (direct, induced) during different project phases; – estimated salaries and compensation for those jobs in comparison to other provincial and local employers; – whether assistance would be provided during any temporary layoffs;

<ul style="list-style-type: none"> – local employment barriers and availability of childcare for workers; and – any training and skills development programs to develop local job candidates.
Request for information on the Proponent's efforts to recruit and train underrepresented groups in the labour market, including Indigenous peoples, youth, women and people with disabilities. Request for information on how these underrepresented groups would be supported to access equal economic benefits and opportunities, and information on mitigation measures that reflect intersectional principles and address barriers of marginalized persons.
Request that the Detailed Project Description clarify how the employment rate would be calculated. It is incorrect to compute the employment rate based on the participation rate.
Request for clarification on who would be responsible for building, leading, and funding community social services and related support systems.
Request for the Proponent to engage with the following local Indigenous Skills and Employment Training agreement holders for information on the local labour force and training opportunities: <ul style="list-style-type: none"> – Kiikenomaga Kikenjigewen Employment and Training Services – Wabun Tribal Council (MamoNuskomitowin) – Wikwemikong Unceded Indian Reserve. – Mamaweswen – The North Shore Tribal Council – Anishinabek Nation (Union of Ontario Indians) – Aboriginal Labour Force Development Circle (First Nation) – Shooniyaa Wa-Biitong – Sioux Lookout Area Aboriginal Management Board – Mushkegowuk Council Employment & Training Service
Need for the Detailed Project Description to identify the locations of permanent and temporary residences and known sensitive receptors, including the location of drinking water sources and of waterbodies used for recreational purposes.
Need for detailed information on potential adverse effects from improper disposal of wastewater and waste, including garbage and debris generated by public road users, and a plan that describes how waste and wastewater would be managed.
Vulnerable Population Groups (Gender-Based Analysis Plus)
Comments on the need to consider Gender-based Analysis Plus (GBA Plus) when collecting information on health, social and economic conditions.
Request for health and safety indicators in relation to gender-based violence and a table of key issues and mitigation measures to address the issues from the basis of a GBA Plus implementation framework.
Concerns about the potential effects on Indigenous women's safety due to new roads and potential mining activity.
Request for further clarity on the segments of the population that would benefit from the Project, including how the economic and social benefits brought to Marten Falls First Nation and Webequie First Nation would be distributed between youth, Elders, women, two-spirit people, and other marginalized identities.
Concerns about potential effects from road infrastructure on social change, and impacts on diverse subgroups of people during all phases of the Project.
Request for the Proponent to clarify the number of people that were engaged from each Indigenous community and specify how intersectional identities and GBA Plus factors were included in their engagement. Request for a table of key issues and mitigation measures to address them from the basis of a GBA Plus implementation framework.
Request for the Proponent to consider education, childcare, and gender-based support systems (women's centers, shelters, and health and support services) in its description of the socio-economic environment.

Request for a table of key issues and mitigation measures to address them from the basis of a GBA Plus implementation framework.
Request that the Proponent assesses the potential impacts on underrepresented subgroups within other local Indigenous communities and public groups that would be impacted by the Project.
Atmospheric Environment (e.g., Air Quality)
Concerns about the potential effects on air quality from point and fugitive emission sources during construction (e.g., land clearing, stockpiling, material handling, blasting, operating diesel generators) and operation, including maintenance (e.g., road use, fuel combustion, mobile off-road machines operating diesel generators and other machinery).
Request for further information on the approach proposed for baseline data collection to assess impacts on air quality, including locations of the human receptors such as traditional land users, and a list of baseline air constituents that would be assessed (inclusive of compounds that would be generated from the Project).
Request for benzo(a)pyrene [BaP] to be used as a surrogate to assess total polycyclic aromatic hydrocarbons (PAHs), instead of BTEX (benzene, toluene, ethylbenzene, and xylene).
Acoustic Environment
Concerns about potential effects of increased noise levels on Indigenous peoples and local businesses, including tourism businesses.
Request for information on places that could be affected by increased noise levels, including places frequented for tourism and local businesses, such as hunting and fishing sites, and trapping cabins.
Comments on the identification of human receptors, particularly those that are noise-sensitive, through engagement activities.
Surface Water and Groundwater
Request for information on effects on surface water quality of wetlands (including peatlands), aquatic ecosystems, and the bottom of waterbodies and watercourses, due to dewatering, change in water temperature, contamination and vegetation clearing that leads to sedimentation and erosion.
Request that Table F-1 of the Detailed Project Description include impact to surface water in relation to acid rock drainage/metal leaching.
Request for information on potential effects to surface water quality from de-icing substances, gas, oil, contaminants from blasting and stockpiling of soil and aggregates, and for detail on potential mitigation measures.
Request for detail on the potential constituents and contaminants released by project activities (e.g., de-icing, stockpiling, blasting) that may affect surface water quality, and for detail on potential mitigation measures.
Request for the development of a management plan for surface water preservation (of quality, quantity and flow) during all project phases.
Concerns about potential effects on waterbodies and watercourses, including physical characteristics (such as rapids).
Concerns about potential effects on surface water hydrology, including the timing and volume of natural water flows, and the installation of culverts and watercourse crossings.
Comments on the importance of culverts to preserve water flow.
Request for information on groundwater characterization, faults, fracture zones, and groundwater-surface interactions based on KBM Resources Group's desktop analysis ² of conditions at the project site. Request that an appropriate groundwater model be prepared, using the desktop analysis.

² Cited from the Initial Project Description: KBM Resources Group (KBM). 2019. Marten Falls First Nation Industrial Supply Road Hydrogeology Baseline Study. Draft. Prepared for AECOM. December 13, 2019.

Navigation and Navigable Waters
Concerns about potential impacts on navigation caused by the Project, including activities that obstruct or restrict the access to navigable waterways (e.g., portage routes and access roads), in particular the Attawapiskat and the Albany rivers.
Request for information on existing navigable waters that could be impacted by the Project. Commented that the Proponent needs to identify all possible navigable waters in proximity to the Project, including all waterbodies and watercourses that are obviously navigable or obviously not navigable (with supporting rationale) and which waterbodies and watercourses still require a determination of navigability.
Riparian Environments and Wetlands (e.g. Peatlands)
Concerns about potential effects to riparian and wetland environments, including from the introduction of invasive species, parasites and diseases, due to year-round access to the region.
Concerns about potential direct and indirect effects on wetlands, wetlands loss and wetland functions, which can be determined through a wetland functions assessment.
Request for buffer zones and other mitigation measures that avoid and/or minimize effects to sensitive areas, such as wetlands.
Request for more information pertaining to building techniques that would prevent the road from causing water-flow barrier effects through peatlands.
Concerns about potential effects on muskegs, wetlands and forests, including on their functions, water quantity and hydrology.
Geology, Topography, Soil and Sediments
Concerns about using locally sourced gravel, eskers or other glacial deposits as construction material, and their potential adverse effects on waterbodies and watercourses due to naturally abundant metals (such as chromium) in materials and their potential release into northern lakes and rivers.
Need for further information on the potential effects on permafrost, eskers, and other glacial deposits due to project activities, including the development of aggregate pits.
Effect and Impact Assessment Methodology
Request for the Proponent to incorporate the Federal Environmental Quality Guidelines in their review of surface water quality data. As well, request for additional information on the methodology proposed for sampling surface water.
Request for further information on baseline data collection and approaches, including detail on: <ul style="list-style-type: none"> – flora and fauna, particularly birds, black bears, moose, species at risk, wetlands, as well as species of importance to eco-tourism; – how the absence of a species would be assessed (i.e., absence during baseline studies does not always mean that the species is not present); – survey design, effort and site selection, as well as analyses on sample bias and uncertainty, with descriptions and justifications for each factor; – seasonal and annual variations, distribution and habitat use; and – maps with overlays that reflect wildlife habitat, migration routes and seasonal changes.
Request for information on the indicators and methods proposed to assess potential impacts on Indigenous peoples' physical and cultural heritage.
Comments that, in relation to increased industrial traffic along the proposed project route, the impact assessment process should assess: <ul style="list-style-type: none"> – changes to the following valued components: <ul style="list-style-type: none"> ○ water and land; ○ remote, pristine and fragile environments; ○ species of importance to Indigenous communities, and their habitats; ○ the continued practice of traditional activities within the traditional territories of Indigenous communities; and

<ul style="list-style-type: none"> ○ ability for Indigenous communities to steward the environment; and – how the effects due to the changes would be mitigated and addressed.
Need for information on how the potential impacts from industrial traffic, between the provincial highway and the mineral deposits in the Ring of Fire area, travelling through Indigenous communities and their traditional territories would be addressed.
Need for engagement with Indigenous communities to gather information on the species of economic and cultural importance, and to inform the baseline studies.
Request for a description of how the cumulative effects assessment would be conducted.
Concerns about the effectiveness of mitigation measures to address adverse effects to mammals including large game animals, as well as adverse effects from the release of contaminants in de-icing products, blasting and stockpiling of soils and aggregate, loss of flora and fauna (including fish, birds and species at risk, and their habitats), changes to water quality and quantity, and the introduction of invasive species, parasites and disease.
Concerns about the effectiveness of mitigation measures that would avoid or reduce potential impacts to Indigenous communities
Request for follow-up and monitoring programs built in collaboration with and led by Indigenous communities that include a funded regional environmental monitoring program and consider the particular environment in the Far North.
Concerns about potential long-term effects on Indigenous communities living on and/or using the land. Request that the determination of significance of residual effects and potential adverse impacts follows best practices, and that the methodology is thoroughly outlined in order for potentially impacted Indigenous communities to understand how conclusions were reached.
Cumulative Effects
Concerns about potential cumulative effects on the pristine natural environment and on the traditional territories of Indigenous communities, from industrial development (e.g. forestry, mineral exploration, mining activities) and the supportive infrastructure (e.g. power generation, power transmission) that would rely on the Project and the proposed road corridors to the Ring of Fire area.
Concerns regarding potential cumulative effects on peatlands and their ability to sequester and store carbon.
Concerns about potential cumulative effects on cultural, social, health and economic conditions.
Concerns about potential cumulative impacts on Indigenous peoples, stemming from the Project and future developments, including impacts from traffic, increased public access (particularly access to traditional territories), downstream effects and climate change.
Need for information on measures to address potential cumulative changes to the exercise of rights protected under section 35 of the <i>Constitution Act, 1992</i> due to the Project, including due to industrial traffic, other projects that are reasonably foreseeable, as well as climate change.
Project Activities, Components and Design
Comments about the lack of clarity about road ownership and the identity of the responsible party for proper operation, including maintenance, of the proposed road.
Need for the Detailed Project Description to provide further information on the purpose of the Project, the construction, operation and the maintenance activities of an industrial road of this length.
Need for the Detailed Project Description to provide additional information on the proposed project components, including the specific locations of aggregate pits, access roads and watercourse crossings.
Request for further clarity on the potential maximum volume of traffic on the road, expected primary users of the road, and future scenarios of mining, forestry, and hydroelectric projects for the alternative road corridors proposed.
Request for transparent information on funding, permitting, and approvals, from government, private sector businesses, and the mineral development industries that support the Project.

Request that the Detailed Project Description references the responsibilities of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and the Kunming-Montreal Global Biodiversity Framework.
Comments about the need for further information on the proposed mitigation measures and the implementation of policies during the operation phase to enforce safe speed limits. Clarify who would be responsible for enforcing these speed limits (i.e., the Proponent or the Ontario Provincial Police).
Need for the Project
Comments indicating that the Project would provide access to economic and social opportunities for local Indigenous communities and industry stakeholders, connecting Indigenous communities to the provincial highway network.
Comment stating the Project would allow future mining developments that are critical to support de-carbonization efforts and net zero emission targets.
Concerns about the scope of the Project not reflecting broader societal perspectives from Indigenous communities and grassroots organizations.
Request that the Detailed Project Description further clarifies the scope of the Project with respect to its purpose(s), alternative means considered, and the weight of negative effects versus positive effects, considering the context of the proposed Webequie Supply Road and the Marten Falls Community Access Road projects, the potential upgrades to the Anaconda and Painter Lake forestry roads and the connection to the mineral deposits in the Ring of Fire area.
Alternative Means of Carrying Out the Project
Need for further information in the Detailed Project Description regarding the alternative means to carry out the Project that would minimize effects to important wildlife areas, such as higher ground, eskers, travel routes, and spawning, denning, feeding and nesting sites.
Alternatives to the Project
Need for information on the alternatives to the Project that the Proponent considered.
Comment that the Proponent should include information on rail as a potential means of transportation to the Ring of Fire area.
Project Contribution to Sustainability
Request for information on how the Project's contribution to sustainability would be determined, recognizing the interconnectedness and interdependence of human-ecological systems and the well-being of present and future generations.
Accidents and Malfunctions
Request for information on potential effects from accidents and malfunctions and the measures to prepare for, and prevent them, particularly unintentional releases of hazardous materials (e.g., fuel) from vehicles and machinery, during all project phases.
Request for information on emergency response plans and procedures to respond to any accidents or malfunctions, including fuel or chemical spills.
Assessment Type
Comments on the need for support for a co-led regional assessment to assess the effects of future mineral development and supportive infrastructure in the Ring of Fire area, cumulative effects, effects on freshwater, impacts on the exercise of Aboriginal and Treaty rights, and climate change, with a preference for the regional assessment to be completed prior to the individual road project assessments. Comments indicating that studies conducted for the regional assessment would also be applicable to the Project and potential effects of the proposed Ring of Fire road corridors should be included in the regional assessment.
Concerns about the level of involvement and participation of Indigenous communities to determine positive and negative effects in the region, including downstream effects.

Concerns about separate assessments for each road segment diminishing the effectiveness of efforts to fully account for the potential regional, cultural and socio-economic impacts of the Project, and contributing to consultation and engagement challenges and burdens on Indigenous communities following their traditional decision-making procedures.

Comments about the need to conduct a First Nation community review panel, in addition to an impact assessment, before development begins.

Other – Editorial Errors in the Initial Project Description

Request that the following editorial changes are reflected in the Detailed Project Description:

- Resolve the inconsistencies with the messaging for the Project's purpose.
- Replace Ministry of Tourism, Culture and Sport (MTCS) with Ministry of Citizenship and Multiculturalism (MCM) when used in the context of the Ontario Government's cultural heritage programs, documents and functions.
- Replace "cultural landscape" with "cultural heritage landscape" when referring to the context of cultural heritage resources. Cultural landscape is not a defined term in the Cultural Heritage Conservation Policy and may be misleading.
- Update Table 15-2 to indicate 'Woodland Caribou' instead of Boreal population. Eastern Migratory Caribou and Boreal Caribou cannot be differentiated by observation, and it is possible Eastern Migratory Caribou could be in the project area.
- Update Table 15-4 as follows:
 - Caribou (Eastern Migratory population) – not currently listed under SARA³ but assessed by COSEWIC as EN (endangered)
 - Common Nighthawk – recently down listed to SC (special concern) under SARA
 - Eastern Wood-pewee – SC under SARA
 - Olive-sided Flycatcher – recently down listed to SC under SARA
 - Peregrine Falcon – recently removed from Schedule 1 of SARA
- Update Table 19-3 to clarify that Natural Resources Canada does not license the transport or the use of explosives.

³ SARA is short for *Species at Risk Act*.