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Abbreviations and acronyms

Abbreviation/acronym	Definition
COMEV	Environmental and Social Impact Evaluating Committee
Committee	Joint Evaluation Committee, composed of representatives from the Impact Assessment Agency of Canada and the Cree Nation Government
COPC	Contaminant of potential concern
COSEWIC	Committee on the Status of Endangered Wildlife in Canada
ECCC	Environment and Climate Change Canada
GBA Plus	Gender-based Analysis Plus
GHG	Greenhouse gases
Guidelines	Tailored Impact Statement Guidelines
HHRA	Human Health Risk Assessment
IAA	<i>Impact Assessment Act</i>
IAAC	Impact Assessment Agency of Canada
SACC	Strategic Assessment of Climate Change
SARA	<i>Species at Risk Act</i>
VC	Valued component



The Impact Assessment Agency of Canada (IAAC)'s guidance documents on the application of the *Impact Assessment Act* and its regulations are being updated. The current versions of these guidance documents, referred to in this document, may not reflect IAAC's current practices. The proponent remains responsible for following applicable legislation and regulations. The proponent is encouraged to engage with IAAC regarding the applicability of these guidance documents. For more information, please contact montsorcier@iaac-aeic.gc.ca.

1. Introduction

The federal impact assessment process is intended to prevent or mitigate significant adverse effects within federal jurisdiction—and significant direct or incidental adverse effects—by anticipating, identifying and assessing the potential effects of designated projects in order to inform decision making under the *Impact Assessment Act* (the IAA). The Joint Assessment Committee (the Committee), which is made up of representatives from the Impact Assessment Agency of Canada (IAAC) and the Cree Nation Government, developed these Tailored Impact Statement Guidelines (the Guidelines) for the Mont Sorcier mining project (the project) proposed by Voyager Metals Inc. (the proponent). The Committee will use the proponent's Impact Statement and other information received during the impact assessment process to prepare an Impact Assessment Report.

The Guidelines list the studies and information that the proponent must provide in its Impact Statement and that the Committee considers necessary in order to assess the adverse effects within federal jurisdiction, or the direct or incidental adverse effects (collectively referred to as adverse federal effects hereafter) of the project that could be significant. This document was tailored based on the nature, complexity and context of the project and was informed by consultation and engagement with Indigenous groups, the public and federal authorities, as well as information the proponent provided.

1.1 Scope of the impact assessment

In determining what information and studies are required in the proponent's Impact Statement for the federal impact assessment process, the Committee took into account the factors listed in subsection 22(1) of the IAA.

In support of the Government of Canada's objective to promote the principle of "one project, one assessment," these Guidelines identify cases where the federal impact assessment and the Province of Quebec's environmental and social assessment process have similar information requirements. To this effect, the Committee referred to the [Directive pour le Projet minier Mont Sorcier par Voyager Metals Inc.](#) (Voyager Metals Inc. Mont Sorcier mine project directive) (in French only) issued by the Environmental and Social Impact Evaluating Committee (COMEV), hereafter referred to as the COMEV Directive, in developing these Guidelines.

Moreover, the COMEV Directive refers to several other documents (directives and guides), including the [Directive 019 sur l'industrie minière](#) (French only), which serves as a framework in the preparation of the



impact statement. The Guidelines do not refer directly to these other documents. However, when the Guidelines refer to the COMEV Directive and the latter refers to other documents, the proponent must also follow these other documents and submit the information required therein in its Impact Statement.

1.2 Selection of valued components

The impact assessment focuses on valued components (VCs) whose analysis should be a determining factor for decision making under the IAA. The VCs serve as the focal points for the Impact Statement and will feed into the conclusions of the Impact Assessment Report. Each VC must be assessed following the [Generic Requirements for Impact Statements](#) and the VC-specific requirements presented in the Guidelines. The assessment of effects must take into account the effect pathways that are cause–effect linkages between a project component or activity and the VC. The Impact Statement must include, at a minimum, the VCs presented in Table 1.

Table 1: Selected valued components and rationale for their inclusion

Valued components selected	Rationale for inclusion
Valued components for the assessment of adverse effects within federal jurisdiction, as defined in section 2 of the IAA	
Fish and fish habitat	Physical changes to Chibougamau Lake, water bodies (lakes and ponds) and watercourses (permanent and intermittent) could have adverse effects on fish survival and health, and/or lead to the harmful alteration, disruption or destruction of their habitat. Changes in the concentration and extent of contaminants (e.g. iron, vanadium, petroleum hydrocarbons and fuels used to power the site) could also have adverse effects on fish and fish habitat. The adverse effects of the project could affect fish at risk or of importance to Indigenous peoples, such as lake sturgeon.
Migratory birds	The project could have effects on migratory birds and their habitats, as well as on migratory bird species at risk and species that are important for Indigenous groups, such as geese. These effects could result in habitat loss and fragmentation; the destruction of nests and eggs; sensory disturbances due to noise, vibrations and light; changes in air and water quality; and increased risk of mortality due to collisions.



<p>Indigenous Peoples' Physical and cultural heritage, and structures, sites or things of historical, archaeological, paleontological or architectural significance</p>	<p>The disappearance of Mont du Sorcier could result in changes to the known and recognized landscape. The project could also have an impact on the sacredness of water for the Cree Nation, potential historical and archaeological sites of Indigenous groups, ceremonial and spiritual sites as well as canoe portages and other historic transportation routes.</p>
<p>Current use of lands and resources for traditional purposes by Indigenous Peoples</p>	<p>Mining activities and the proposed railway could reduce access to the territory and camps of members of the Cree Nation and disrupt their fishing, hunting, trapping and gathering activities, and traditional healing practices. The project could also lead to changes to the land access roads, and the resources Cree families use at trapping grounds to meet their subsistence needs. Land users could also change their behaviour, reducing or ceasing their traditional activities because of sound pollution or concerns about the potential presence of contaminants.</p>
<p>Health, social and economic conditions of Indigenous Peoples</p>	<p>Construction and operation activities could have adverse effects on the physical, mental and social health and well-being of the Cree, particularly because of the airborne emissions (dusts, gases released during iron extraction and processing); increased noise and light levels; changes in surface water, groundwater and drinking water quality (particularly the water flowing from Mont du Sorcier) and traditional foods; as well as the loss or reduction of lands and resources and access to them. These changes could also have an adverse effect on their healing process.</p> <p>The health of the Innu of Mashteuiatsh who use and occupy the land near the project could also be affected by airborne emissions caused by the project.</p> <p>The project could also have effects on Cree trappers' incomes due to the alteration of trapping grounds.</p>
<p>Additional valued components for decision-making factors under section 63 of the IAA</p>	
<p>Economic well-being of communities, job creation and economic opportunities</p>	<p>The project could generate economic benefits and opportunities for members of the Mistissini and Oujé-Bougoumou Cree Nations, as well as for the communities of Chibougamau and Chapais (e.g. jobs,</p>



	training, contracts, local purchasing, etc.). These economic opportunities could contribute to sustainability.
Clean energy transition	The project could contribute to the transition to a sustainable, low-carbon, and digital economy, as the minerals that would be mined are included in Canada's list of critical minerals.

Table description: The left-hand column of the first section of the table lists the five VCs that were selected for the assessment of adverse effects within federal jurisdiction, as defined in section 2 of the IAA. The left-hand column of the second section of the table lists two additional VCs pursuant to section 63 of the IAA. The right-hand column of the table describes the rationale for the inclusion of each VC.

The proponent may select other VCs, in consultation with Indigenous groups and participants, and in consideration of Indigenous knowledge and community knowledge. If a VC suggested by an Indigenous group is excluded from the Impact Statement, the Impact Statement must provide a rationale.

1.3 Preparing the Impact Statement

In preparing the Impact Statement, the proponent must adhere to ethical guidelines and cultural protocols governing research, data collection and confidentiality. The proponent must respect the obligation of protecting personal information, including for disaggregated data from different groups of population, and adopt established standards for managing Indigenous data (e.g. [First Nations principles of Ownership, Control, Access and Possession](#) or standards adopted by an Indigenous group). The Committee recommends that the Impact Statement follow the structure of the Guidelines or provide a table of concordance that indicates where in the Impact Statement the information set out in these Guidelines has been provided.

The Impact Statement must address all the requirements set out in the Guidelines, including those referring to the requirements of the COMEV Directive. The Impact Statement must also meet the requirements outlined in the [Generic Requirements for Impacts Statements](#), which include requirements regarding the assessment methodology, including cumulative effect evaluation, the general information, the description of change to the project that may be caused by the environment, the description of potential malfunctions or accidents that may occur in connection to the project, the description of engagement with Indigenous groups, the description of public participation, and the Impact Statement Summary. The proponent may submit a single document that meets the requirements of both the Committee and COMEV.

Where the proponent is of the opinion that the information is not required, it should contact the Committee prior to submitting the Impact Statement to confirm whether the proponent's rationale for excluding the information is appropriate. The rationale must also be provided in the Impact Statement. As applicable, the proponent is also encouraged to refer to the requirements of other jurisdictions to assess effects, as well as to means of other jurisdictions to address effects of the project and to report in the Impact Statement how



these were leveraged to assess effects. The proponent should also notify the Committee of any changes made to the project relative to the initial project description.

Where relevant, the Impact Statement must take into account:

- any relevant regional or strategic assessment;
- any relevant assessment of the project's effects that is carried out by or on behalf of an Indigenous governing body and that is provided to the proponent with respect to the project;
- any study or plan prepared by a jurisdiction—or an Indigenous governing body—in respect to the region where the project is located and that is provided to the proponent with respect to the project;
- Indigenous knowledge, community knowledge and comments received from Indigenous groups, the public and any other authority;
- Gender-based Analysis Plus (GBA Plus), in the context of an impact assessment, is an analytical tool and process that examines how sex and gender intersect with other identity factors to assess who might be disproportionately affected by a project and how they might experience the impacts differently. GBA Plus helps identify the experiences and needs of various population groups, and guides strategies to mitigate barriers and promote equitable access to project benefits.

The proponent is encouraged to engage the Committee as early as possible to clarify the requirements in the Guidelines and to support early resolution of issues. The Committee may establish technical advisory groups consisting of Indigenous groups, federal authorities or others. The proponent is also encouraged to submit draft documents for Committee review (e.g. proposed study plans, draft sections of the Impact Statement) prior to submitting the formal Impact Statement.

1.4 Federal permitting coordination

IAAC will coordinate federal permits, licences or authorizations (collectively called permits) early and throughout the impact assessment process to achieve the following objectives:

- clarify permitting requirements, timelines and processes by developing a detailed permitting plan;
- ensure transparency on the status and progress of permits through public reporting on the Canadian Impact Assessment Registry.

Federal authorities must wait until the impact assessment process has been completed before issuing permits, licences and authorizations. However, the proponent is encouraged to develop or apply for federal permits early in the impact assessment. Information, engagement and consultation requirements for permits may be completed at the same time as the Impact Statement and, in some cases, the same information can be used for both processes. Collecting and providing permitting information during the impact assessment process may speed up subsequent federal decisions if the impact assessment decision is positive.



2. Project description

2.1 Project overview

The project subject to the impact assessment includes the designated physical activities and any incidental physical activities. The proponent must describe the project, presenting the main components of the project and associated activities, details of their scheduling, the timeline for each stage, the total lifespan of the project, and other essential characteristics. If the project is to be developed in phases, information on progressive and phased development must be described.

2.2 Project components and activities

The Impact Statement must describe the project components and activities planned for each project phase and provide sufficient detail to understand the potential environmental, health, social and economic effects of the project, as well as the impacts on Indigenous Peoples and their rights, as determined by Indigenous groups. To this end, the proponent must refer to the requirements in sections 1. Mise en contexte and 3. Description du projet (both sections in French only) of the COMEV Directive.

The description must include the following activities and components:

2.2.1 Project components at the mine site

- open pit(s) and access ramps;
- storage areas for waste rock, tailings and overburden;
- ore processing plant;
- primary and secondary crushers;
- ore conveyor network;
- ore concentrate storage area;
- the section of railway line connected to the existing rail network;
- basins and pumping stations for water associated with mining waste management;
- the network of ditches, basins and pumping stations for collecting runoff water in contact with mining infrastructure;



- systems for pumping mine water, extracting fresh natural water, recirculating process water to the mine tailings facility, mining wastewater management and treatment, treatment and distribution of water for human consumption, treatment and management of domestic wastewater, and the treatment and management system for water from the washing bay;
- workers camp;
- fuel storage site;
- powder magazine, detonator warehouse and explosives preparation area;
- access roads connecting the various infrastructure, structures and works; and
- any other infrastructure relevant to the project.

2.2.2 Project activities

2.2.2.1 Site preparation and construction

- clearing and stripping areas to prepare the surface where future infrastructure, structures and works will be built, including blasting if needed;
- building access roads and haul roads;
- producing concrete and washing concrete mixers;
- building the new section of railway line connected to the existing railway network;
- building temporary or permanent crossings over water bodies and watercourses or crossings for land users of the new railway line;
- doing sanitary sludge management and wastewater treatment;
- developing temporary water management infrastructure to manage surface water in areas undergoing work site preparation;
- developing temporary storage areas to maintain the machinery used for site preparation work;
- storing, managing and disposing of combustible materials, hazardous waste and non-hazardous waste;
- using and maintaining light, heavy and mobile off-road motorized equipment; and
- transporting materials, controlling access-road traffic and refuelling machinery.

2.2.2.2 Operation

- drilling and blasting;



- extracting, transporting and storing waste rock;
- excavating and storing overburden;
- extracting and transporting raw ore to crushing equipment;
- supplying energy to various equipment;
- conducting gradual restoration using overburden;
- processing ore (crushing, grinding, magnetic separation and flotation), including using reagents;
- preparing ore concentrate (thickening, filtration, drying);
- thickening and storing residues from the ore processing process in the tailings pond, confined by retaining structures (dikes);
- supplying water to the ore processing plant;
- transporting the ore concentrate by covered conveyor to the storage area in a closed area;
- storing the ore (high and low grade) and ore concentrate;
- transferring the ore concentrate to railcars using a conveyor structure and a loading tower;
- transporting the ore concentrate by train on the new section of the railway line;
- using de-icing salts and dust-control products;
- managing water at the mine site, including runoff, mine drainage and wastewater;
- withdrawing natural water to supply certain systems;
- treating final mine effluent; and
- treating domestic wastewater.

2.2.2.3 Decommissioning and abandonment

- closing, rehabilitating and restoring the site (including mine waste storage areas and the open pit(s));
- dismantling infrastructure and dismantling and removing equipment; and
- implementing a long-term monitoring and maintenance program, and monitoring and maintaining site integrity, including site drainage, water and effluent management, and any remaining structures.



2.3 Receiving environment

The Impact Statement must describe the geographical setting and context in which the project will be carried out to understand the potential effects and impacts of the project on the environment, health, society and the economy. To this end, the proponent must refer to the requirements of the COMEV Directive, specifically sections 3. Description du projet and 4. Description du milieu (both sections in French only).

The Impact Statement must also specify the location of any federal lands in the study area, as well as the distance between the project components and federal lands, including lands on a Reserve or to be added to a Reserve, within the meaning of subsection 2(1) of the *Indian Act*.

2.4 Project purpose, need and alternatives considered

The proponent must explain the purpose and need for the project and analyze alternative means of carrying out the project.

2.4.1 Purpose and need for the project

To explain the purpose and need for the project, the proponent must refer to section 1.3 Raisons d'être du projet (in French only) of the COMEV Directive.

2.4.2 Alternative means of carrying out the project

To provide information on alternative means of carrying out the project, the proponent must refer to section 2. Choix des variantes d'emplacement et de technologie (in French only) of the COMEV Directive.

In addition, in justifying its alternatives, the proponent must also consider the impacts on Indigenous Peoples and their rights, and the adverse effects on species at risk. The proponent must perform this analysis for the main components of its project. The proponent should also take into account the type of mining operation (underground or open pit) and the method of mine waste management and storage (e.g. co-disposal, accumulation in a pit) in its alternative means analysis.

3. Fish and fish habitat

The Impact Statement must assess the effects of the project on fish and fish habitat, as defined in subsection 2(1) of the *Fisheries Act*, based on likely [effect pathways](#). Certain intermittent and ephemeral watercourses or water bodies may constitute or contribute to fish habitat. The absence of fish or water at the time of the survey does not irrefutably indicate an absence of fish and/or fish habitat.



Where authorization(s) under paragraph 34.4(2)(b) or 35(2)(b) of the *Fisheries Act* are likely required for the project, the proponent is encouraged to provide the information required to obtain these authorizations during the impact assessment process (sections 3.1 to 3.4 below) to facilitate and expedite permitting approval process. Further information on permit requirements under the *Fisheries Act* is available on the website [Project planning: Applying for a Fisheries Act authorization](#) and in the [Applicant's Guide Supporting the Authorizations Concerning Fish and Fish Habitat Protection Regulations](#).

If the project requires a regulatory amendment to list the water frequented by fish on Schedule 2 of the *Metal and Diamond Mine Effluent Regulations* (MDMER), providing the required information during the impact assessment, in accordance with the guidelines and policies of Environment and Climate Change Canada (ECCC) and Fisheries and Oceans Canada (DFO), can reduce the time needed to obtain an amendment to Schedule 2 of the MDMER. For more information, the proponent should consult the [Guide to the regulatory process for listing water bodies frequented by fish in Schedule 2 of the MDMER](#).

3.1 Groundwater and surface water baseline conditions as a pathway of effects to fish and fish habitat

To describe the baseline conditions for groundwater and surface water, the proponent must refer to the requirements of the COMEV Directive in section 4.2.1 Milieu biophysique (in French only), as well as the documents referred to therein. These requirements cover the delineation and characterization of wetlands, the description and characterization of water bodies, including in particular the quality of water (groundwater and surface water), soil and sediments, geology, hydrological and hydrogeological characterization, uses of watercourses and water bodies, and aquatic and riparian vegetation. In addition to the COMEV Directive requirements, the proponent should take into account existing atmospheric depositions that could alter the quality of surface water (and, through infiltration, groundwater) in its description of the baseline conditions. It is recommended that uncontaminated environments be chosen as baseline conditions. In the event that contamination is suspected in certain environments, the proponent must describe their past uses.

3.2 Baseline conditions for fish and fish habitat

To describe the baseline conditions for fish and fish habitat, the proponent must refer to the requirements of the COMEV Directive in section 4.2.1 Milieu biophysique (in French only) and the documents referred to therein. These requirements include the identification and description of the fish species present and their habitats.

The description of the fish populations must be based on historical data, as well as experimental fisheries. In addition to the information required in the COMEV Directive and, more specifically, for water bodies and watercourses (permanent and intermittent) frequented by fish and likely to be affected by the project, the description of fish populations must also include their life cycle and their initial contamination level (e.g.



mercury). Furthermore, the description of potential and confirmed fish habitats must include a characterization of their function (feeding, reproduction, rearing, shelter, cover habitat, thermal and overwintering refuge, growth and migration) and quality for the species present. For each water body and watercourse frequented by fish and likely to be affected by the project, the Impact Statement must present maps at appropriate scales using aerial imagery overlaid with relevant descriptions, as well as summary tables of baseline conditions for fish and fish habitat.

In addition, the Impact Statement must also provide a list of federal aquatic invasive species and a list of aquatic species at risk with status listed in Schedule 1 of the *Species at Risk Act* (SARA) that are likely to be present (such as lake sturgeon, southern Hudson Bay and James Bay populations) and provide the location and description of these species' habitat (residence and critical habitat) in or near the study areas. The proponent is also encouraged to include other species assessed by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC).

3.3 Effects to groundwater and surface water as a pathway of effects to fish and fish habitat

To describe the project's effects on groundwater and surface water, the proponent must refer to section 5.1.1 Milieu biophysique (in French only) of the COMEV Directive, and the documents referred to therein. These requirements cover the project's effects on water quality and quantity, sediment quality, the water table, and wetlands, including the effects of water use, and wastewater and effluent discharge. The assessment of effects on water must also include a water balance according to section 3.5.1 of the COMEV Directive and hydrogeological modelling according to [Directive 019 sur l'industrie minière](#) (in French only), taking into account the different types of mining infrastructure (pits, mine tailings storage facilities, mine wastewater retention ponds, etc.).

The Impact Statement must also include a characterization and description of mine materials and their management. To do this, the proponent must refer to the requirements of the COMEV Directive, particularly sections 3.4 Gestion des résidus miniers et des stériles and 3.5 Gestion des eaux (both in French only). Like all materials extracted from the site, blasted material used in railway construction should undergo geochemical characterization to determine how it should be managed and what measures should be taken to protect water resources. The assessment of effects on groundwater and surface water must consider the metal acidity and discharge rates determined during characterization of the mining materials. The proponent must pay particular attention to vanadium and its leaching potential.

3.4 Effects to fish and fish habitat

The proponent must refer to the requirements of section 5.1.1 Milieu biophysique (in French only) of the COMEV Directive and the documents referred to therein to describe potential effects to fish and fish habitat. These requirements relate, among other things, to the project's effects on fish populations and their habitats, including fish survival and movement, and habitat alteration or destruction.



In addition to the information required in the COMEV Directive, and more specifically, the Impact Statement must include an assessment of the potential effects on the life cycle of the fish species present. The assessment of effects to fish and fish habitat must also consider:

- changes to groundwater and surface water baseline conditions (e.g. surface water flows, hydraulic connectivity, groundwater-surface water exchanges, physicochemical parameters);
- temperature changes and their potential effects on the fish population of Chibougamau Lake;
- the increase in fishing in the study areas;
- the [sensitive periods for fish](#);
- the potential effects of noise and vibration, including effects on fish behaviour; and
- the likely effects on aquatic species at risk listed in Schedule 1 of the SARA, including the lake sturgeon (southern Hudson Bay and James Bay populations), and the objectives of management plans, recovery strategies and action plans for those species. The proponent is also encouraged to include species assessed by COSEWIC.

Where possible, the proponent must describe the project's effects using the *Fisheries Act* terminology (i.e., fish mortality, as well as the harmful alteration, destruction and disruption of the fish habitat) so it is possible to validate whether the project results in effects prohibited under subsections 34.4(1) and 35(1) of the *Fisheries Act*.

To support the impact assessment and the authorization processes, where it is not possible to eliminate, reduce or control adverse effects on fish and fish habitat, the Impact Statement must describe offsetting measures, which may include restoration of degraded fish habitat, habitat enhancement or construction, or stocking, referring to the [Policy for Applying Measures to Offset Harmful Impacts to Fish and Fish Habitat](#).

The proponent is also invited to consult the following documents:

- [Guidelines for Watercourse Crossings in Quebec](#) (DFO, 2016) which offers mitigation measures to ensure the free passage of fish;
- [Guidelines for the Use of Explosives In or Near Canadian Fisheries Waters](#) (Wright and Hopky, 1998), which offers mitigation measures when dynamiting is taking place near fish-bearing waters.

4. Migratory birds

The Impact Statement must describe and characterize the project's effects on migratory birds as defined in the *Migratory Birds Convention Act, 1994*. Among the migratory bird species likely to be present, the proponent may select birds or groups of birds to be used as indicators for assessing the effects. The proponent must select these birds or groups of birds considering that different species and groups of species may be affected differently by the project and may require different mitigation measures. The Impact



Statement must also address each migratory bird species at risk listed under the SARA that is likely to be present in the project area and affected by the project, including:

- Barrow's Goldeneye, eastern population;
- Bank Swallow;
- Barn Swallow;
- Canada Warbler;
- Common Nighthawk;
- Olive-sided Flycatcher; and
- Red-necked Phalarope.

4.1 Baseline conditions

To describe the baseline conditions for migratory birds or groups of migratory birds and their habitats, the proponent must refer to the requirements of section 4.2.1 Milieu biophysique (in French only) of the COMEV Directive. These requirements cover primarily the description of bird species present and their habitats, as well as the mapping information required.

In addition to the information required in the COMEV Directive, and more specifically, for the selected migratory birds, the Impact Statement must:

- describe their population, distribution, seasonal ranges, migrations, movements, habitat use for relevant life cycle stages, and sensitive periods. These descriptions must include estimates of abundance or density, where available;
- identify all sites that are likely to be sensitive habitats for migratory birds or environmentally important areas (e.g. migratory bird sanctuaries or other priority areas or refuges for birds, and national wildlife refuges); and
- for species at risk:
 - describe and locate on a map at an appropriate scale their potential habitats, as well as their residences and critical habitat, if any, of each species;
 - if surveys are carried out, identify on a map the locations where they have been identified and reported; and
 - describe the threats and applicable conservation or management objectives based on their recovery program or management plan.



In addition, the proponent must justify whether existing data and recent studies are sufficient to assess the project's effects on migratory birds, considering the uncertainties and bias of these sources. If existing data is not sufficient, the proponent must conduct surveys, including:

- targeted surveys to better determine the presence or location of migratory birds at risk where unique mitigation measures or follow-up could be required;
- habitat characterizations to identify rare or important habitats for different stages of the birds' life cycle (e.g. nesting) and habitats of migratory birds at risk; and
- surveys where risks or uncertainty related to effects on birds are moderate to high, or where bird presence, population or distribution are poorly known. Such surveys would greatly inform the assessment of effects.

4.2 Effects to migratory birds

To assess the effects to migratory birds, the proponent must refer to the requirements of section 5.1.1 Milieu biophysique (in French only) of the COMEV Directive. These requirements concern primarily the survival and movements of birds, the destruction or modification of their habitats, as well as the species at risk and their habitats.

In addition to the information required in the COMEV Directive, and more specifically for the selected migratory birds, the Impact Statement must describe:

- the likely pathways of effects to migratory birds. The proponent must consider the potential for mortality (e.g. collisions, predators, interactions with tailings ponds) and disturbance (e.g., light, noise, vibrations, air emissions, dust and the disturbance caused by the presence of workers);
- the effects of changes to migratory bird habitat (e.g. degradation, destruction) and to migration routes; and
- the effects on the critical habitat of migratory birds at risk. This includes a quantification of habitat loss relative to habitat availability in or near the study area, for each migratory bird species at risk, as well as an illustrative mapping of this effect including the footprint of the facilities.

5. Indigenous Peoples

The Impact Statement must demonstrate how impacts on Indigenous Peoples and their rights were considered and assessed, including:

- impacts resulting from any change to the environment on the physical and cultural heritage; on current use of lands and resources for traditional purposes; or on any structure, site or thing that is of historical, archaeological, paleontological or architectural significance;



- any change to their health, social or economic conditions;
- impacts on their rights.

Indigenous groups are best placed to understand how a project may impact them. In particular, Cree communities are very concerned about the effects of climate change on the Eeyou Istchee territory. The assessment of impacts on Indigenous Peoples and their rights must be carried out in collaboration with Indigenous groups, as outlined in the “Description of engagement with Indigenous groups” section of the [Generic Requirements for Impact Statements](#). The proponent must collaborate with Indigenous groups to incorporate information from or about them into the assessment of effects on VCs (e.g. biophysical VCs). Thus, the proponent must respect each Indigenous group’s preferences for assessing impacts and discuss with each of them whether it is appropriate for the proponent to provide its conclusions regarding impacts (residual and cumulative) on Indigenous Peoples and their rights. If an Indigenous group has provided its own conclusion, the proponent may use it in its Impact Statement. When the proponent's conclusions differ from those of the Indigenous groups, they must be clearly documented and justified.

The proponent is expected to engage with all Indigenous groups identified in the [Indigenous Engagement and Partnership Plan](#) and describe the outcomes of this engagement in the Impact Statement. In addition, engagement results must be analyzed and presented separately for each Indigenous group. This group-specific assessment does not need to repeat the entire analysis of each VC but should summarize and present the relevant information for each Indigenous group. To the extent possible, each group-specific assessment should be conducted in the manner that works best for that Indigenous group.

At the request of Indigenous groups, all or parts of the assessment of impacts on Indigenous Peoples and their rights can be combined into a group-specific assessment. For example, effects on the current use of lands and resources for traditional purposes and impacts on hunting, fishing, and trapping rights can be assessed together. Indigenous groups may also identify holistic VCs that encompass several environmental, health, social or economic components. Doing these assessments together, when requested, will support consistent conclusions. In all cases, the Impact Statement must demonstrate that all requirements have been met.

The proponent must pay particular attention to the pathway of effects, i.e., changes the project could cause to the environment (e.g. air quality, wildlife), and the impact of these changes on Indigenous physical and cultural heritage; structures, sites or things of significance; the current use of lands and resources for traditional purposes; and health, social or economic conditions of Indigenous Peoples.

5.1 Indigenous physical and cultural heritage and structures, sites or things of significance

The Impact Statement must evaluate and clearly distinguish the project’s impacts on Indigenous people’s physical and cultural heritage and its impacts on their structures, sites or things of historical, archaeological, paleontological or architectural significance. The proponent must take into account the considerations set out in the [Technical Guidance for Assessing Physical and Cultural Heritage or any Structure, Site or Thing](#).



5.1.1 Baseline conditions

The Impact Statement must:

- describe the baseline conditions associated with physical and cultural heritage, and with structures, sites or things of significance to Indigenous Peoples with sufficient detail to support the Impact Assessment;
- describe how past and current developments have affected physical and cultural heritage and the ability to transmit culture; and
- indicate the location of physical and cultural heritage features and sites of significance on maps, if Indigenous groups have shared this information with the proponent and authorized its publication (if required, a coarser geographic resolution can be used).

Information about heritage and structures, sites or things of significance to Indigenous groups, including information they have identified, may include, but are not limited to:

- places of spiritual significance, including water bodies and watercourses, as well as traditional and historic navigation routes and portage sites, notably the former canoe route between Chibougamau Lake and Mistassini Lake and other historical navigation routes;
- potential historical and archaeological sites of Indigenous groups, including former camp sites;
- landscapes (notably the Mont du Sorcier landscape), places, plants, animals (notably the Woodland Caribou, Boreal population), objects, persons or features) that are sacred (notably water), ceremonial or culturally significant;
- plants and trees that play an important role in Cree culture, notably in medicine and the manufacture of objects of cultural significance; and
- other environmental components Indigenous groups have identified as having value with regards to heritage.

In addition, Woodland Caribou, Boreal population, is a species of importance to Indigenous Peoples, both in terms of cultural heritage and current use of resources for traditional purposes. To inform the impact assessment for caribou-related VCs, the Impact Statement must provide information on the baseline conditions of the Woodland Caribou, Boreal population. To this end, the proponent must refer to the requirements of the COMEV Directive and the [Amended Recovery Strategy for the Woodland Caribou \(*Rangifer tarandus caribou*\), Boreal Population, in Canada 2020](#) to complete its description of baseline conditions specific to Woodland Caribou in a manner consistent with the latter.



5.1.2 Effects on Indigenous physical and cultural heritage and structures, sites or things of significance

The Impact Statement must:

- assess the potential effects to Indigenous groups' physical and cultural heritage, as well as on structures, sites or things of historical, archaeological (notably the sectors identified in Map 5 of the [Summary of an Initial Project Description](#)), paleontological or architectural significance, including:
 - modification, loss or destruction of physical and cultural heritage;
 - changes to access to physical and cultural heritage sites;
 - changes to the cultural value, spirituality or importance of physical and cultural heritage;
 - changes to sacred, ceremonial or culturally significant places, objects or things, languages, histories, cultural transmission and traditions;
 - changes to visual aesthetics throughout the project and after project decommissioning;
- assess any other effects highlighted by Indigenous groups;
- provide copies of correspondence with provincial, territorial or Indigenous authorities responsible for heritage resources with comments on any physical and cultural heritage resource assessment.

5.2 Current use of lands and resources for traditional purposes

The Impact Statement must assess the impacts of the project to the current use of lands and resources for traditional purposes. The analysis must align with the steps set out in the [Technical Guidance for Assessing the Current Use of Lands and Resources for Traditional Purposes under CEAA 2012](#).

5.2.1 Baseline conditions

If Indigenous groups provide and validate information, the Impact Statement must describe the baseline conditions related to the current use of lands and resources for traditional purposes, including:

- lands covered by treaties, title areas, land claims or traditional territories (including maps);
- how past and present developments have impacted the current use of lands and resources;
- reserves and communities;
- any Indigenous protected and conservation areas;



- Indigenous governance systems and Indigenous laws associated with the current use of lands and resources for traditional purposes;
- traditional activities currently or historically practiced (e.g. hunting, fishing, trapping, gathering of plants or medicinal resources, access to land and camps, and travel routes);
- baseline conditions for aspects likely to have a pathway of effects on the current use of lands and resources by Indigenous Peoples, with sufficient detail to support the impact assessment, including:
 - resources Indigenous groups use to meet their subsistence needs, including species use (magnitude, timing) and availability as country foods or for other traditional purposes. Include a description of each species of importance, including the Woodland Caribou Boreal population, moose, bear, hare, beaver, bird species (e.g. goose and Rock Ptarmigan) and fish, and indicate whether their consumption has cultural importance for Indigenous groups, including for medicinal purposes. To describe wildlife resources, except fish and birds, the proponent must refer to the requirements of the COMEV Directive, specifically section 4.2 Description des composantes pertinentes (in French only);
 - for fish and birds, refer to the requirements in the Guideline's section on fish and fish habitat and the section on migratory birds;
 - where possible, sites used in the study areas or historically important sites for the collection of country foods (e.g. important fishing sites) must be identified and mapped;
 - navigable waters and their uses, navigable water users, and existing concerns regarding navigable water use and access;
- any other current uses Indigenous groups have identified.

5.2.2 Effects to current use of lands and resources for traditional purposes

The Impact Statement must assess the potential effects of the project on the current use of lands and resources for traditional purposes, taking into account historical and current cumulative effects and likely effect pathways. This includes changes to:

- the quality, perceived quality and quantity of resources, as well as access to them:
 - With respect to effects on terrestrial wildlife, including Woodland Caribou, which is of importance to Indigenous peoples, the Impact Statement must refer to the requirements of the COMEV Directive, section 5.1.1 Milieu biophysique (in French only), to describe and assess the project's effects on terrestrial wildlife and its habitat.
 - For caribou, report on how the project and mitigation measures will be consistent with the [Amended Recovery Strategy for the Woodland Caribou \(*Rangifer tarandus caribou*\), Boreal Population, in Canada 2020](#);



- the location, frequency, duration or timing of fishing, hunting, trapping, gathering, traditional healing practices, cultural or ceremonial activities and other traditional practices, including any avoidance of resources due to perceived quality;
- the practice of *ilnu aitun* by the Innu of Mashteuiatsh (because of the disturbances related to noise pollution that the project could cause);
- the economic burdens of, and increased time for, travelling further to hunt, fish, trap and gather;
- Indigenous groups' efforts to restore traditional practices;
- the experience of being on the land (e.g. sensory and visual disturbance, fragmentation of traditional territory, any impact on well-being resulting from sensory changes);
- the use of riverbanks, land access roads, travel ways, navigable waterways and water bodies, including for social and ceremonial purposes, travel or recreation; and
- any other uses Indigenous groups have identified.

The Impact Statement must also describe the effects on navigation and navigation safety arising from the following components and activities:

- project components to be built in navigable waters; and
- mining operations that could have an indirect effect on navigable waters.

5.3 Health, social and economic conditions of Indigenous Peoples

To assess the project's impacts on the health, social, and economic conditions of Indigenous Peoples, the proponent should consult the following guidance and reference documents:

- [Analyzing Health, Social and Economic Effects under the *Impact Assessment Act*](#);
- [Tools and approaches for assessing and supporting public health action on the social determinants of health and health equity](#);
- [Reclaiming Power and Place: The Final Report of the National Inquiry into Missing and Murdered Indigenous Women and Girls](#), in particular, Calls for Justice targeting the extractive and development industries (Calls for Justice 13.1 to 13.5); and
- [Indigenous Mental Wellness and Major Project Development – Guidance for Impact Assessment Professionals and Indigenous Communities](#).



5.3.1 Baseline conditions

Baseline conditions should present health, social and economic conditions in a community-specific way, using disaggregated data where available. The Impact Statement must present baseline conditions regarding the health, social, and economic conditions of communities in sufficient detail to support the impact assessment. Baseline conditions established for Indigenous communities must take into account Indigenous governance regimes and Indigenous laws related to health and socioeconomic conditions.

5.3.1.1 Health conditions

The Impact Statement must describe the current state of physical, mental and social well-being. The Impact Statement must:

- develop community health profiles using the definitions of physical, mental and social health and well-being specific to each Indigenous groups consulted, where information is available;
- describe factors contributing to groups health that are of interest to Indigenous Peoples, including factors contributing to community resilience and well-being;
- identify and describe the biophysical and social determinants of health relevant to the project and Indigenous groups. At the biophysical level, provide the approximate location and distance of likely human receptors (including Cree camps), including foreseeable future and sensitive receptors that may be affected by changes in air quality, water quality, soil and sediment quality, country foods quality, and noise and light levels;
- describe sources of drinking water, as well as water bodies and waterways used for recreational or cultural purposes;
- describe the level of food security and food sovereignty within Indigenous groups. It is advisable to refer to the Public Health Agency of Canada's food security website and to the [First Nations Food, Nutrition and Environment Study](#) for more information;
- describe Indigenous Peoples' access to and consumption of country foods as a health-related behaviour (e.g. site-specific consumption studies, [First Nations Food, Nutrition and Environment Study](#)); and
- provide baseline concentrations of contaminants in air, drinking water, soil and sediments (the proponent must refer to the requirements of sections 4.2.1 and 4.2.2 of the COMEV Directive):
 - For country foods Indigenous communities use and consume, the proponent must work with the Indigenous communities potentially affected to identify the species or resources for which there is a potential risk of increased contaminant levels. If a potential risk is identified, the proponent must assess that risk. The proponent must determine and justify whether existing baseline data can be used or whether tissue samples or resources should be collected and if so, work with Indigenous communities to determine the best sampling method.



5.3.1.2 Social conditions

The Impact Statement must include community profiles to understand the context of each Indigenous community. These profiles must include:

- a demographic profile of each Indigenous community consulted and a list of important sociocultural values;
- a Community Well-Being index profile for each Indigenous community consulted using publicly available data on Indigenous Services Canada's [Community Well-being index](#) website;
- a description of the psychosocial and sociocultural environment;
- the relevant historical background of the communities;
- applicable history of previous proponents and environmental liabilities, including mines (e.g. impacted water bodies and waterways, contamination levels, fish consumption recommendations, etc.); and
- any other factors relevant to the consulted Indigenous groups.

The Impact Statement must provide information on the available local and regional services as well as existing infrastructure in the study areas and describe their capacity insofar as they relate to the social and health conditions of Indigenous communities. It should also describe access to health and social services, community support networks, and perceived and actual safety in and around the mining industries;

5.3.1.3 Economic conditions

The Impact Statement must describe:

- the main economic activities of Indigenous peoples in the study areas, including a description of the use of lands and water bodies for economic purposes;
- an overview of Indigenous businesses that could provide the supplies and services required for the project;
- information on active community members, including an overview of Indigenous participation in the local and regional workforce;
- the availability of skilled and unskilled workers and conditions influencing labour availability throughout the project's lifetime;
- workforce development and training plans for Indigenous peoples;
- barriers to employment or participation in the labour market;
- Indigenous or federal economic development plans for the study areas; and
- relevant treaty provisions pertaining to economic activities for Indigenous Peoples.



5.3.2 Effects on the health, social and economic conditions of Indigenous Peoples

The proponent must assess the project's effects on human health and on the social and economic conditions of potentially affected Indigenous communities. In particular, the Impact Statement must describe the interactions and interconnections between these effects and other VCs.

5.3.2.1 Effects on health conditions

The Impact Statement must:

- include a health impact assessment, including biophysical and social determinants of health;
- determine whether a human health risk assessment (HHRA) is required, taking into account the following:
 - current and future contaminants of potential concern (COPC)¹;
 - current and future human receptors;
 - current and future exposure pathways; and
 - a conceptual site model illustrating the existing links between COPCs, human receptors and exposure pathways;
- if an HHRA is not conducted, provide a rationale for why it is not warranted; and
- if an HHRA is conducted, assess all COPC exposure pathways and consider a multimedia HHRA for contaminants with multiple pathways.

The proponent should consult the [Interim Guidance for Health Impact Assessment of Designated Projects under the *Impact Assessment Act*](#) and to Health Canada's [Guidance for Evaluating Human Health Effects in an Impact Assessment: Human Health Risk Assessment](#).

Biophysical determinants of health

The Impact Statement must:

- provide an assessment of the potential effects on the health of Indigenous groups, in particular taking into account potential changes to:

1. COPC: Any chemical substance whose concentration in an environmental medium is likely to be elevated because of project activities may be considered a COPC in the first instance. However, if it is determined that the sum of modelled and background concentrations is below the guidelines, standards or criteria—based on health protection—of the affected environment, the problem statement stage of the risk assessment may conclude that it is not necessary to treat this chemical as a COPC in a quantitative risk assessment.



- air quality, noise exposure and vibration effects. To describe the atmospheric and acoustic environment, the proponent must refer to the requirements of the COMEV Directive, in particular section 5.1 Détermination et évaluation des impacts (in French only).
- ambient light;
- accessibility, availability and current and future quality of country foods;
- drinking water and water used for recreational and cultural purposes;
- the Cree healing process; and
- any other effects Indigenous groups have identified, if applicable;
- assess the cancer risks associated with human exposure to all potentially carcinogenic polycyclic aromatic hydrocarbons present in fuels, particularly those of the diesel type, and characterize the carcinogenic risk of diesel exhaust;
- provide a rationale if it is determined that an assessment of the potential for contamination of country foods is not necessary or for any COPC or non-negligible exposure pathways that would be excluded or eliminated from the HHRA;
- document and take into account tolerance thresholds for potential adverse health effects Indigenous Peoples have defined;
- describe any project-related changes that could have positive health impacts (e.g. remediation projects).

Social determinants of health

The Impact Statement must assess the effects on the health of Indigenous Peoples from key social determinants of health, including those described in sections 5.3.2.2 and 5.3.2.3 of the Guidelines, in addition to psychosocial factors such as:

- perceived risks to human health and potential avoidance of certain places, water sources or foods due to perceived contamination;
- the resilience and well-being of Indigenous groups (e.g. due to changes in the relationship with the land, the stewardship role and cultural continuity);
- the feeling of distress and the physical health effects resulting from loss of land and land use and limited access to lands, food and drinking water;
- public health and safety concerns (e.g. risks of accidents or malfunctions related to project activities, risks to the health and safety of Indigenous women and girls); and
- disruption of daily activities.



5.3.2.2 Effects on social conditions

Effects on community well-being

The Impact Statement must:

- assess the potential effects on community well-being, taking into account:
 - changes to food security (including country food), income inequality and cost of living;
 - changes resulting from population growth, particularly in terms of access to housing and basic goods and services;
 - risks associated with the disruption of community, family and household cohesion; and
 - the main sectors of local economic activity, including traditional economic sectors;
- assess effects on access, ownership and use of resources (e.g. land, minerals, infrastructure); and

describe the potential effects of project-related working conditions and coping mechanisms on the safety of Indigenous communities including those of Indigenous women and girls.

The Impact Statement must describe the anticipated positive and adverse effects on local and regional services and infrastructure, including access to these services and infrastructure in the study areas insofar as they are related to social conditions.

5.3.2.3 Effects on economic conditions

The Impact Statement must:

- describe potential changes in employment for Indigenous communities, by breaking down the data to show, for each stage of the project, the number of positions available by type of job (e.g. permanent or temporary; part-time or full-time; contract or employee; role and skills required);
- describe potential changes in training opportunities for Indigenous communities;
- describe the main sectors of local economic activity, including traditional economic sectors;
- estimate the capacity of the local and regional market to meet the demand for employees and describe the potential risks of labour shortages, taking into account the different phases of the project and other projects in the region;
- indicate and describe any agreements on economic benefits concluded or planned with Indigenous groups, if applicable and if the communities concerned have agreed to share this information;
- provide an estimate of the anticipated levels of economic participation for Indigenous groups in relation to the total project requirements (e.g. total dollar value of contracts);



- describe situations where the project could directly or indirectly create economic hardship (e.g. loss of income for trappers, job losses) or economic opportunities, such as the relocation of businesses to Indigenous communities near the project site; and
- describe any other effects Indigenous groups have identified, if applicable.

The economic information provided will be made available to the public and must not contain confidential business information.

5.4 Rights and values of Indigenous Peoples

The IAA confirms the Government of Canada's commitment to ensuring respect for the rights of Indigenous Peoples in Canada, as recognized and affirmed by section 35 of the *Constitution Act, 1982*. The proponent is encouraged to refer to IAAC's [Guidance: Assessment of Potential Impacts on the Rights of Indigenous Peoples](#), [Policy Context: Assessment of Potential Impacts on the Rights of Indigenous Peoples](#) and IAAC's Indigenous Advisory Committee's guidelines: [Principles to Guide the Assessment of Impacts to Indigenous Inherent and Treaty Rights](#).

The values of Indigenous groups form the basis for and illustrate the exercise of these rights. These values, shaped by Indigenous Knowledge, tradition, culture, and spirituality, emphasize the protection of the environment and social environment, the protection of traditional ways of life, access to territory, and sustainable development.

5.4.1 Baseline conditions

The Impact Statement must:

- describe the Indigenous and treaty rights of Indigenous Peoples potentially affected by the project, including historical context, their scope and the importance of the rights to the rights-bearing groups (e.g. practices, customs, beliefs, worldviews and livelihoods);
- document the values or concerns identified by the groups, as well as any thresholds the groups have identified beyond which the groups' ability to exercise their rights in a meaningful way could be adversely affected; and
- document the cumulative impacts that already impede or could impede their ability to exercise rights or transmit Indigenous cultures and cultural practices.

Indigenous groups must be actively involved in the baseline characterization of their rights.



5.4.2 Impacts on the rights and values of Indigenous Peoples

The proponent must share studies and information about the project and its potential impacts with Indigenous groups prior to assessing the impact of the project on their rights. The proponent must collaborate with Indigenous groups in assessing those impacts.

The proponent, in collaboration with Indigenous groups, must document the potential impacts on the rights of Indigenous Peoples, including the severity of the project's potential impacts, as expressed by the potentially affected Indigenous Peoples. To this end, the proponent must consider the following (where relevant):

- residual impacts on Indigenous Peoples' rights and cumulative impacts;
- the project's effects on Indigenous cultures, traditions, laws and governance;
- the project's impacts on Indigenous groups' planning, management or stewardship of traditional lands and resources;
- how the project will change Indigenous groups' ability to derive future economic benefits from or maintain an ongoing relationship with the land or water;
- how the project aligns with Indigenous groups' values, political directions and objectives in the fight against climate change;
- how the project and its impacts weaken or strengthen Indigenous groups' authority on their territory; and
- how the project affects any other significant components Indigenous groups have identified.

In the territory covered by the James Bay and Northern Quebec Agreement (JBNQA), the Cree and Inuit signatories to the JBNQA enjoy certain rights. For example, Chapter 24 of the JBNQA establishes a unique regime for hunting, fishing, and trapping and recognizes certain rights related to these traditional activities. In developing the impact statement, the proponent is encouraged to consider these rights, without being limited to them.

The proponent is also encouraged to consider the values of Indigenous groups without being limited to them. For reference, the guiding principles of Chapter 22 of the JBNQA, section 22.2.4, and the [Cree Nation Mining Policy](#) provide food for thought regarding Cree values in the context of development projects. In addition, the protection of the traditional way of life, access to healthy land and wildlife resources, and the concept of "living well" of the natural environment are values of importance to the signatories of the JBNQA.

The Impact Statement must:

- describe solutions to concerns raised about impacts on the exercise of rights, as agreed to by Indigenous groups;
- describe the methodology used and agreed to by Indigenous groups for assessing impacts on their rights, and include any Indigenous-led studies that were provided if permission has been obtained from the Indigenous group to do so;



- provide an explanation where an Indigenous group has not provided its views on the impact of the Project on their rights to the proponent, or where the proponent and an Indigenous group, in consultation with IAAC, agree that the Indigenous group will provide information on impacts on their rights directly to IAAC.

6. Contributions to inform decision making

When making a decision under the IAA, should the decision maker determine that the adverse federal effects are likely to be, to some extent, significant, the decision maker will decide whether they are justified by the public interest in light of the extent to which they are significant and the factors set out in section 63 of the IAA. The requirements in this section of the Guidelines may inform the analysis of these factors.

6.1 Canada's environmental obligations and climate change commitments

The Committee, with the support of federal authorities, will analyze the project's likely effects in the context of Canada's environmental obligations that apply to the project and will analyze the project's greenhouse gas (GHG) emissions in the context of Canada's emission targets and forecasts. The information gathered during the planning phase, including information on similar development projects, suggests that this project would generally not contribute to the Government of Canada's ability to meet its environmental obligations and climate change commitments. This is because of the project's footprint on the receiving environment (e.g. habitat loss resulting in adverse effects on biodiversity) and the potential emissions caused by the project (e.g. GHG emissions). If the proponent believes that the potential effects of the project may contribute to the Government of Canada's ability to meet its environmental obligations or climate change commitments, the proponent is encouraged to substantiate this view in the Impact Statement by describing these potential effects and the extent of their contribution (e.g. net positive impacts on biodiversity through habitat recovery, net negative GHG emissions through carbon capture).

6.1.1 Environmental obligations

Federal environmental obligations relevant to this project include:

- Canada's 2030 Nature Strategy and legislation that supports the implementation of Canada's biodiversity commitments, including the SARA and the *Canada Wildlife Act* (1985), as well as related policies and guidance documents;
- SARA recovery strategies and action plans for all species at risk potentially affected by the project;



- the Convention on Wetlands of International Importance Especially as Waterfowl Habitat (Ramsar), as implemented in part under the Federal Policy on Wetland Conservation and related guidance documents, such as the North American Waterfowl Management Plan; and
- the Convention for the Protection of Migratory Birds in the United States and Canada, as implemented in part under the *Migratory Birds Convention Act, 1994* and supporting guidance documents on conservation objectives derived from bird conservation regions and strategies.

The Impact Statement must provide a list of SARA Schedule 1 species likely to occur in the study areas, identify the adverse effects of the project on these species and their critical habitat as well as the measures that will be taken to avoid or mitigate those effects and monitor them. It must refer to the descriptions of effects already provided for VCs in other parts of the Impact Statement, as appropriate. The proponent is also encouraged to refer to the most recent COSEWIC annual report and to include other species assessed by COSEWIC as extirpated, endangered, threatened or of special concern.

Where the proponent is of the view that the likely effects of the project contribute to the Government of Canada's ability to meet its environmental obligations, the proponent is encouraged to:

- describe the initiatives or actions the proponent wishes to implement and that could contribute to meeting the environmental obligations listed above;
- with respect to biodiversity²:
 - describe and, where possible, quantify the likely changes to biodiversity resulting from the project referring to relevant guidance such as the [Voluntary guidelines on biodiversity-inclusive impact assessment](#) from the Convention on Biological Diversity;
 - apply the mitigation hierarchy to describe whether and how the project would result in no net loss or would have net positive impacts on biodiversity; and
 - describe whether and how the likely effects of the project will contribute to achieving the targets set out in Canada's 2030 Nature Strategy.

6.1.2 Climate change commitments

Where the proponent is of the view that the likely effects of the project contribute to the Government of Canada's ability to meet its climate change commitments, the proponent is encouraged to describe the initiatives or actions that will be put in place to contribute to the fulfillment of those commitments. The proponent is also encouraged to assess the project's GHG emissions in accordance with ECCC's guidance on [Strategic Assessment of Climate Change \(SACC\)](#), including the draft [Guidance on quantification of net GHG emissions, impact on carbon sinks, mitigation measures, net-zero plan and upstream GHG assessment](#). The Committee invites the proponent to keep apprised of updates to the SAAC and related

² The Convention on Biological Diversity defines biological diversity, or biodiversity, as "the variability among living organisms from all sources including, terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are part; this includes diversity within species and between species and of ecosystems".



ECCC technical guides. The proponent can also refer to the COMEV Directive, specifically section 3.9 Émissions de GES, lutte contre les changements climatiques et adaptation (in French only). The proponent should consider the strategies in place and the efforts made by local, regional and national actors to fight climate change in the Eeyou Istchee region.

6.2 Project's contribution to sustainability

Sustainability is the ability to protect the environment, contribute to the social and economic well-being of the people of Canada, and preserve their health for the benefit of present and future generations. The information in these Guidelines can be used to support the sustainability analysis.

6.2.1 Social and economic well-being of communities

The proponent is encouraged to refer to the requirements of the COMEV directive in sections 4.2.2 Milieu social and 5.1.2 Milieu social (both in French only). These requirements primarily concern the local and regional economy and land use. In addition to the information required in the COMEV Directive, in its Impact Statement, the proponent is encouraged to include a description of:

- the likely effects on the project's contribution to components of the [Community Well-being index](#) for the communities of Chibougamau and Chapais identified as important during public consultations (labour force activity, income);
- the workforce and economic development opportunities based on local and regional economic activities and workforce capacity, including:
 - the anticipated workforce region of origin (i.e., local, regional, out-of-province or international employees);
 - working conditions and the expected work schedule for construction and operations (e.g. hours of work, shift schedules, shuttle flights);
- economic benefits for Canadians, including growth in gross domestic product, tax revenue and indirect benefits, such as investments in the development and adoption of clean technologies and the growth of innovative businesses, clusters and supply chains in Canada (e.g. by providing critical minerals needed for the global transition to a net-zero economy).

6.2.2 Extent to which the likely effects of the project contribute to sustainability

The Impact Statement must provide an analysis of the extent to which the project's likely positive effects and the adverse federal effects contribute to sustainability, according to the following steps:



- identify the key VCs from section 1.2 Selection of valued components of the Guidelines, as well as any other VC relevant to the well-being of Canadians and local communities (e.g. economic and social benefits) to include them in the sustainability analysis;
- establish temporal boundaries, taking into account how the effects on the identified VCs could affect future generations, including beyond the project's lifecycle; and
- provide an analysis to determine the extent to which potential federal positive and negative effects result in a net positive contribution to sustainability (based on the criteria of no, low, moderate or high contribution):
 - consider the interconnectedness and interdependence of human–ecological systems;
 - consider the well-being of present and future generations;
 - consider positive effects and reduce adverse effects of the designated project; and
 - apply the precautionary principle and consider uncertainty and risk of irreversible harm.