

Responses to Friends of the Attawapiskat River Comments on the Final EA/IS

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Friends of the Attawapiskat River	1	I. BACKGROUND c. Our Direct Interest and History of Engagement Before the 2020 comment period, the Friends invited the Agency to participate in in-community engagement sessions to facilitate direct dialogue and improve access to information. Despite this, the Agency did not participate in in-community sessions and subsequent invitations during the public comment period were declined. Instead, engagement opportunities with the Agency were confined to Webex platforms or off-reserve locations. It's important to note that, for fly-in communities, reliable internet access is limited and travel to off-reserve locations is cost-prohibitive. In these circumstances, centralized or online formats present practical barriers to meaningful participation.	These comments are directed at government agencies and outside the scope of the Community Access Road. We would therefore encourage you to direct these to the regulators, as they will be best positioned to address them.	960
Friends of the Attawapiskat River	1	I. BACKGROUND c. Our Direct Interest and History of Engagement The concerns articulated in this submission are not new. They reflect views expressed by community members over several years of engagement concerning the proposed development in the proposed Ring of Fire region and related infrastructure, such as the MFCAR. We request that all of our prior comments and correspondence be taken into account, as the Agency reviews the	The Community Access Road is intended to improve access, foster economic development and improve the overall quality of life for the Marten Falls First Nation members. Although the Community Access Road is frequently linked to larger regional efforts such as the Ring of Fire, Marten Falls First Nation underscores that this Environmental Assessment / Impact Assessment process is focused solely on the advancement of the Community Access Road itself.	961

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		completeness of the IS.	In addition, these comments are directed at government agencies and outside the scope of the Community Access Road. We would therefore encourage you to direct these to the regulators, as they will be best positioned to address them.	
Friends of the Attawapiskat River	2	II. GAPS IN THE IMPACT STATEMENT The Guidelines require that boreal caribou, a listed species at risk,⁵¹ be assessed as a valued component, which includes monitoring effects on caribou and their habitat to verify impact assessment predictions, evaluating mitigation measures, and identifying any unanticipated effects requiring adaptive management.⁵² Moreover, in describing effects on caribou, the Guidelines require the IS to “provide an assessment of the potential adverse effects on boreal caribou habitat (e.g., at the range and sub-range scales) considering the direction provided in the [Range Management Plans] and [General Habitat Description].”⁵³ During the community gatherings we have held, there is a high degree of concern about woodland caribou, including that exploration activities and accompanying activities (e.g. draining of mushkeg and water taking) will impact the land, their habitat, and recovery. We have also heard concerns about disease incidence and the potential for project-related disturbances to increase existing human-	The Caribou Regional Study Area for the Project includes the geographic extent of four provincial caribou ranges that intersect the originally proposed alternative routes (Missisa, Ozhiski, Nipigon and Pagwachuan ranges), as required by the Tailored Impact Statement Guidelines (Section 7.4.2; Impact Assessment Agency of Canada, 2020) and as determined through discussion with the Ministry of the Environment, Conservation and Parks. Missisa and Ozhiski ranges are two of the six provincial ranges that are combined into the federal boreal caribou range named the Far North range (ON9; ECCC 2020). Together, their land mass makes up 37% of the federal Far North range. The other provincial ranges that combine into the federal Far North range (Spirit, Swan, Kinloch, and James Bay) were beyond the geographic scope of the potential effects of the Project; however, in Appendix M - Ungulates Technical Support Document, Sections 5.1.2.1 and 7.1.1.2.1 (Distribution of Seasonal Ranges) and 5.1.2.2 and 7.1.1.2.2 (Connectivity of Travel Corridors), a qualitative	975

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		induced pressures on already stressed caribou ranges. The Friends submit that there must be a rigorous assessment of impacts, including cumulative effects on the boreal caribou ranges, and consideration of reasonably foreseeable development. However, as drafted, this detailed info is critically lacking. The Friends submit that the Impact Statement must be expanded to include the Far North caribou ranges, particularly given their migratory patterns, at-risk status and need to halt human-induced threats to their survival and recovery. Recommendation No. 12: The IS must be expanded to explicitly include Far North caribou ranges in the mapping of baseline conditions and the assessment of cumulative effects, particularly given their migratory patterns, at-risk status and need to halt human-induced threats to their survival and recovery.	discussion is provided about movement of collared caribou into James Bay boreal range and eastern migratory caribou range up to their calving ranges at the coast of Hudson Bay. An assessment of cumulative effects in these ranges is included in Section 8.2.1 of Appendix M. References: ECCC (Environment and Climate Change Canada). (2020). Amended Recovery Strategy for the Woodland Caribou (<i>Rangifer tarandus caribou</i>), Boreal population, in Canada. Species at Risk Act Recovery Strategy Series. Environment and Climate Change Canada. Ottawa, Ontario. xiii + 143 p. Impact Assessment Agency of Canada. (2020, February 24). Marten Falls Community Access Road Project Tailored Impact Statement Guidelines. Retrieved from https://iaac-aeic.gc.ca/050/documents/p80184/133937E.pdf	
Friends of the Attawapiskat River	2	II. GAPS IN THE IMPACT STATEMENT j. Cumulative Effects and Pre-Existing Human and Environmental Health Conditions The Guidelines require that the IS identify and assess the Project's cumulative effects, including cumulative environmental, health, social and economic effects. The Guidelines further provide that the cumulative assessment	Cumulative Effects: The EA/IS follows the process for Cumulative Effects Assessment outlined in the Policy Framework for Assessing Cumulative Effects under the Impact Assessment Act (https://www.canada.ca/en/impact-assessment-agency/services/policy-	976

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		must consider “cumulative effects to rights of Indigenous peoples and cultures, for all potentially impacted groups, including those located in the areas which will be impacted by increased access to the region by exploration and mineral development projects.”⁵⁴ This requirement reflects the broader obligations under section 22(1) of the IAA. In their previous submission on the Guidelines, the Friends recommended that the projects’ assessment of cumulative effects account for historical changes within the watershed that have been caused by prior human activity and industrial developments, highlighting that present-day ecological conditions should not be a marker for which impacts are measured. The IS does not meaningfully consider prior human activity or industrial development within the watershed as part of its cumulative effects assessment. The Friends remain concerned that assessing project effects against present-day conditions risks obscuring the cumulative impacts already experienced in the region. Recommendation No. 13: The IS must not rely only on present-day ecological and watershed health conditions, but ensure the projects’ cumulative effects assessment takes into account historical changes within the watershed that have been caused by prior human activity and industrial developments.	guidance/practitioners-guide-impact-assessment-act/policy-framework-assessing-cumulative-effects-under-impact-assessment-act.html) which notes that "A description of past conditions can at times improve the understanding of cumulative effects for a specific VC". The EA/IS include consideration of past human activity and industrial development as part of it's existing conditions, specifically where historical records exist those were considered as part of the existing condition. Specific identification of effects from historical development on the historic landscape is not a component of a project specific environmental assessment, and is therefore outside of the scope of this EA/IS. Aboriginal and/or Treaty Rights and Interests: Each Indigenous community received an individual Draft Aboriginal and/or Treaty Rights and Interests (ATRI) Report, which includes a dedicated cumulative effects section (Section 8). This section presents the assessment of potential cumulative impacts on Aboriginal and/or Treaty Rights and Interests, including those arising from the cumulative environmental effects of the Project in combination with past, present, and reasonably foreseeable future activities. The ATRI cumulative effects analysis considers how historical and current changes within the Study	

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			Area have shaped the availability, accessibility, and quality of the valued components that support the exercise of rights. Draft ATRI reports were submitted to each community for their review and feedback and the final ATRI reports will be sent to communities in May 2026.	
Friends of the Attawapiskat River	2	II. GAPS IN THE IMPACT STATEMENT h. Intergenerational Effects & Characterizing the Severity of Impacts The Guidelines state that, “in order to assess a project’s contribution to sustainability, consideration should be given to the long-term effects on the well-being of present and future generations.”⁴⁶ The Guidelines further provide that the proponents are “encouraged” to include a description of the intergenerational impacts of the project on community members.⁴⁷ In the Friends’ previous submission on the Guidelines, concerns were raised regarding the limited treatment of intergenerational effects within the assessment framework. The Friends submit that consideration of intergenerational impacts within the IS remains deficient. Principles of intergenerational and intragenerational equity are key sustainability principles and squarely within the purposes of the IAA, including the requirement under section 22(1)(i) to assess the extent to which a	The Impact Assessment Agency of Canada (the Agency) issued the Tailored Impact Statement Guidelines (TISG) for the Marten Falls First Nation Community Access Road on February 24, 2020. Following amendments to the Impact Assessment Act, the Agency provided correspondence to Marten Falls First Nation on June 11, 2025 outlining next steps for the Impact Statement Phase. As noted by the Agency, the review will focus on key issues under federal jurisdiction and positive benefits of the Project, while leveraging federal, provincial, and Indigenous mechanisms outside the Impact Assessment Act where appropriate. The Final Environmental Assessment / Impact Statement (EA/IS) and supporting Technical Support Documents were prepared to meet the requirements of the TISG, the approved Terms of Reference, and discipline-specific study plans. Additional detail related to intergenerational	974

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		designated project contributes to sustainability. As highlighted in the Guidelines, the IAA defines sustainability as “the ability to protect the environment, contribute to the social and economic well-being of the people of Canada and preserve their health in a manner that benefits present and future generations”. Given the permanence of the project and the anticipated operating lifespan of the proposed Ring of Fire, potential effects must be considered over extended temporal scales, including impacts that may persist for at least 100 years into the future. Within the IS, Marten Falls First Nation members “emphasize the importance of conserving the land and resources to allow future generations to continue to enjoy and benefit from them.”⁴⁹ Community members also say they “are committed to preserving their way of life and supporting the health of their environment for future generations.”⁵⁰ Despite this, the IS does not include a description of the project's intergenerational impacts on these members, nor does it assess how the project may impact the ability of future generations to enjoy and benefit from the land and resources in the context of the proposed Ring of Fire. These impacts must be addressed within the impact assessment process. Recommendation No. 11: The IS must	effects is provided in Appendix T – Final Community Well-Being Support Document, which incorporates community input and well-being indicators across temporal scales. Relevant sections of Appendix T that address intergenerational effects include: - Cultural Preservation and Change (Section 7.1.1.16; Section 7.2.1.16): The assessment identifies potential long-term effects related to changes in access to hunting and trapping areas, wildlife disturbance, and implications for subsistence practices and associated knowledge transfer across generations. - Mitigation Measures (Sections 7.1.1.17 and 7.2.1.16): Mitigation includes consideration of community-driven measures that support cultural continuity, including intergenerational learning, language transmission, and cultural revitalization initiatives. - Cumulative Effects on Mental Health and Well-Being (Section 8.3.3.1): The cumulative effects assessment considers both temporary and long-term disturbances to the land and the potential for persistent effects on community mental health and well-being, acknowledging uncertainty in individual and intergenerational responses over time. - Traditional Foods and Land-Based Activities (Section 7.2.1.25): The assessment identifies potential positive effects associated with improved access to traditional harvesting areas, supporting participation by Elders and	

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		explicitly consider intergenerational effects and accompanying risks imposed on future generations, including those arising from the project and the accompanying mining exploration and development occurring in the proposed Ring of Fire region.	youth and contributing to long-term cultural continuity and food security. Through these sections the Project seeks to understand how intergenerational effects may persist over time and influence the ability of present and future generations to maintain cultural practices, well-being, and relationships with the land, consistent with the objectives of the Impact Assessment Act and the TISG.	
Friends of the Attawapiskat River	2	II. GAPS IN THE IMPACT STATEMENT g. Commitments to Protect Climate and Safeguard Biodiversity The Guidelines highlight how “the Government of Canada, through IAA, recognizes that the impact assessment contributes to Canada’s understanding and ability to meet, first, its environmental obligations, and second, its commitments in respect of climate change.”⁴² The Guidelines further require that the IS “provide an assessment of the Project’s emissions potentially contributing or adding to existing ground ozone levels,”⁴³ consistent with section 22(1)(j) of the IAA, which requires consideration of the extent to which a designated project may hinder or contribute to the Government of Canada’s ability to meet its environmental obligations and its commitments in respect of climate change. However, among the environmental obligations and commitments the IS does not acknowledge or engage with is Canada’s	The Impact Assessment Agency of Canada (the Agency) issued the Tailored Impact Statement Guidelines for the Marten Falls First Nation Community Access Road on February 24, 2020. On June 20, 2024, the Budget Implementation Act, 2024, No. 1, received Royal Assent and brought into force amendments to the Impact Assessment Act. The Agency sent a letter to Marten Falls First Nation on June 11, 2025 outlining the next steps in the Community Access Road Impact Statement Phase due to the amendments made to the Impact Assessment Act. As stated in the letter, the Agency will focus their technical review of the Community Access Road Impact Statement on key issues under federal jurisdiction, which are relevant for decision making, specifically federal effects and the positive benefits of the Community Access Road. The Agency will also concentrate on leveraging federal mechanisms	973

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		commitments under the Kunming-Montreal Global Biodiversity Framework (the “Global Biodiversity Framework”).⁴⁴ In December 2022, Canada, along with 195 nations, adopted the Global Biodiversity Framework. The preamble to the Framework notes that the parties are “[a]larmed by the continued loss of biodiversity and the threat that this poses to nature and human well-being;” and “[r]eaffirms its expectation that Parties and other Governments will ensure that the rights of indigenous peoples and local communities are respected and given effect to in the implementation of the Kunming-Montreal global biodiversity framework.” Target 22 is of primary significance as it ensures Indigenous Peoples’ participation in decision-making. More specifically, it is designed to: Ensure the full, equitable, inclusive, effective and gender-responsive representation and participation in decision-making, and access to justice and information related to biodiversity by indigenous peoples and local communities, respecting their cultures and their rights over lands, territories, resources, and traditional knowledge, as well as by women and girls, children and youth, and persons with disabilities and ensure the full protection of environmental human rights defenders. The Friends submit that the Global Biodiversity Framework is directly relevant to the	outside of the Impact Assessment Act as well as provincial legislative frameworks and instruments, to address the key issues. Key issues the Agency will focus on are with respect to fish and fish habitat, migratory birds, potential impacts to Indigenous Peoples and public interest factors. The Final EA/IS and the Technical Support Documents were prepared to meet the requirements outlined in the Terms of Reference, the Tailored Impact Statement Guidelines and the technical discipline-specific study plans. The Ministry of the Environment, Conservation and Parks will determine if the EA / IS meets the provincial requirements, while the Agency will determine if the EA/IS meets the information gathering requirements of the TISG, and the Minister or Cabinet will make a determination based on the key issues under federal jurisdiction.	

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		assessment of the project, particularly given the interconnected nature of the mushkeg, wetlands, and watersheds that will be impacted by the Project and its enabling function. This framework emphasizes the urgent need to halt and reverse biodiversity loss and requires equitable decision-making that respects Indigenous peoples' rights, cultures, and traditional knowledge. Consideration of these commitments is therefore necessary to ensure that potential effects are adequately assessed within the impact assessment process. Recommendation No. 10: The IS must identify and incorporate Canada's commitments under the Kunming-Montreal Global Biodiversity Framework, and explain how the commitments under the framework will inform the scope, conduct, and decision-making of an impact assessment, particularly in light of the sensitive and interconnected ecosystems potentially affected by the project.		
Friends of the Attawapiskat River	2	II. GAPS IN THE IMPACT STATEMENT f. Legislative and Regulatory Framework The Guidelines require that the IS identify all "legislation and other regulatory approvals that are applicable to the Project at the federal, provincial, regional and municipal levels."³⁶ Notably, the IS fails to meaningfully incorporate the United Nations Declaration on the Rights of Indigenous Peoples ("UNDRIP") and the	Marten Falls First Nation (MFFN) agrees with the Friends that UNDRIP, the UN Declaration Act, and the Impact Assessment Act (IAA) together establish a legislative and regulatory framework that must be interpreted and applied in a manner consistent with Indigenous rights, including the obligation of Canada to consult and cooperate with indigenous peoples to obtain the right to free, prior and informed	972

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		United Nations Declaration on the Rights of Indigenous Peoples Act ("UN Declaration Act"), thereby undermining the integrity of the Impact Assessment process. The IAA was written with UNDRIP in mind, as evidenced by the preamble, which states how the "Government of Canada is committed to implementing the United Nations Declaration on the Rights of Indigenous Peoples,"³⁷ including through impact assessment processes. UNDRIP affirms minimum international standards for the survival, dignity, and well-being of Indigenous peoples and directly informs the interpretation and application of the IAA, as evidenced by the IAA preamble. Among other things, UNDRIP provides: Article 26 [...] 2. Indigenous peoples have the right to own, use, develop and control the lands, territories and resources that they possess by reason of traditional ownership or other traditional occupation or use, as well as those which they have otherwise acquired. Article 32 [...] 2. States shall consult and cooperate in good faith with the indigenous peoples concerned through their own representative institutions in order to obtain their free and informed consent prior to the approval of any project affecting their lands or territories and other resources, particularly in connection with the	consent (FPIC) of their representative institutions under Article 32(2) of UNDRIP. The MFCAR's project footprint is entirely within the traditional territory of MFFN. Canada must seek FPIC from MFFN to approve the Project and has done so. Canada may also be required to seek FPIC from other First Nations for the project if the Project will have a meaningful impact on a substantive right of that community, but Article 32(2) does not require Canada to obtain FPIC from "all potentially affected Indigenous peoples." MFFN does not agree with the Friends' that UNDRIP has the same trigger as the duty to consult under Section 35 of the Constitution Act, 1982. To date, these regimes have distinctive elements. As such, the Crown's constitutional consultation obligations to neighbouring communities do not automatically trigger the requirement for FPIC from every consulted community. MFFN also agrees with Friends that Article 26(2) of UNDRIP applies here because of the existence of traditionally occupied lands. This Article provides MFFN with the right to use, develop and control its traditional territory. This Article also supports MFFN's right to be the Indigenous proponent of the MFCAR. The Friends do not explain why they fail to acknowledge that the MFCAR is sited on MFFN's and Aroland First Nation's traditional	

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		development, utilization or exploitation of mineral, water or other resources. Article 37 1. Indigenous peoples have the right to the recognition, observance and enforcement of treaties, agreements and other constructive arrangements concluded with States or their successors and to have States honour and respect such treaties, agreements and other constructive arrangements. 2. Nothing in this Declaration may be interpreted as diminishing or eliminating the rights of indigenous peoples contained in treaties, agreements and other constructive arrangements. By virtue of the UN Declaration Act, UNDRIP has been enshrined into Canada's positive law³⁸ and the federal government is required to act in a manner consistent with UNDRIP, recognizing that Indigenous peoples have suffered historic injustices as a result of colonization and dispossession of their lands, territories and resources, and that all relations with Indigenous peoples must be based on the recognition and implementation of the inherent right to self-determination.³⁹ This commitment to reconciliation is reinforced by the Truth and Reconciliation Commission of Canada's Calls to Action, which affirm UNDRIP as the foundational framework for reconciliation in Canada: Call to Action 43	territory, or that the consultation process for the MFCAR has provided extensive opportunities for two-way dialogue not only to MFFN, but to more than 20 indigenous communities. There are many other relevant Articles under UNDRIP, but the Friends cite only Article 37. MFFN agrees with Friends that Article 37 requires States to honour and respect treaties. As Friends does not say so, MFFN is a Treaty 9 signatory. As such, Article 37 protects MFFN's treaty rights, including the rights exercised through the Project. In response to the Friends regarding the IAA framework, Friends fails to recognize the exceptional work on Aboriginal and Treaty Rights and Interests (ATRI) which was carried out to develop the MFFN EA/IS. Pursuant to the IAA, MFFN has carried out a robust, evidence-based assessment of cumulative, regional, and downstream effects of the proposed MFCAR in accordance with the IAA and the Tailored Impact Statement Guidelines. This MFFN response to its statutory obligations under the IAA is related to, but not reducible to, how MFFN addresses UNDRIP. MFFN thus strongly disagrees with the Friends' Recommendation No.9. MFFN finds support for its proponentcy of MFCAR in Treaty 9 and UNDRIP because of its traditional occupancy	

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		We call upon federal, provincial, territorial, and municipal governments to fully adopt and implement the United Nations Declaration on the Rights of Indigenous Peoples as the framework for reconciliation. Call to Action 44 We call upon the Government of Canada to develop a national action plan, strategies, and other concrete measures to achieve the goals of the United Nations Declaration on the Rights of Indigenous Peoples. UNDRIP provides the foundational framework for reconciliation. Since it now forms part of domestic law, UNDRIP must be used to interpret Canadian law and legal obligations,⁴⁰ including the IAA and the Agency's responsibility to uphold Indigenous rights. These rights are protected by section 35 of the Constitution Act, 1982. They "are not frozen and are capable of evolution and growth," and there is "an urgent need to respect and promote the rights of Indigenous peoples affirmed in treaties, agreements, and other constructive arrangements".⁴¹ This demonstrates that Indigenous rights under UNDRIP are protected by section 35 and creates a corresponding duty to respect these rights. Recommendation No. 9: The IS must identify and incorporate Canada's international and domestic obligations under UNDRIP and the	and use of these lands. MFFN finds no basis in Article 32(2) of UNDRIP for the Friends to claim that it provides a right of veto or FPIC to "all potentially affected Indigenous peoples."	

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		UN Declaration Act, as well as the Truth and Reconciliation Commission's Calls to Action, and explain how the project will be developed in a manner consistent with those obligations, including obtaining free, prior, and informed consent of all potentially affected Indigenous peoples.		
Friends of the Attawapiskat River	2	II. GAPS IN THE IMPACT STATEMENT e. Water Level Changes and Current Stressors The Guidelines require that the IS "provide the timing of freeze/thaw cycles, ice cover, and ice conditions for surface water bodies in the Project area,"³¹ and consider water level changes, seasonal variation, and associated spatial and temporal effects to groundwater.³² The Guidelines further require that the IS describe "existing environmental, health, social and economic components, interrelations and interactions as well as the variability in these components, processes and interactions over time scales and geographic boundaries appropriate to the Project, including consideration of variability due to potential future climate change" (emphasis added).³³ In the Friends' previous submission on the Guidelines, concerns were raised that there was no meaningful consideration of how seasonal freeze/thaw cycles and breakup in the spring affect mushkeg water levels. In addition, the effect of seasonal variations and breakup in light of climate change was also not	A Climate Adaptation and Resiliency Technical Support Document was prepared in support of the Final EA/IS and is included in Appendix Y. As part of the existing conditions and effects assessment, a climate change risk assessment was conducted to identify and evaluate the risk that climate-related hazards may have on the Community Access Road, Indigenous Communities and the natural environment. Based on the identified climate hazards, the climate-change-related risks were assessed before recommendations to increase the resilience of the Community Access Road were developed. The results of the Climate Adaptation and Resiliency Technical Support Document were incorporated into other technical support documents, as appropriate. For example, the Surface Water Technical Support Document (Appendix F) incorporated mitigation measures from Appendix Y such as considering climate change factors in the design of waterbody crossing structures (culverts and bridges); as	971

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		addressed. Participants from communities within the Attawapiskat watershed have already observed changes in water conditions and declining levels of inland lakes. Thus, a review of water levels in light of climate change and the Ring of Fire's footprint is critical. The IS acknowledges that the project area will become "warmer and wetter" in the future, leading to an increase in freeze-thaw cycles.³⁴ The IS also briefly references freeze-thaw cycles in the context of climate adaptation.³⁵ However, the IS does not consider freeze-thaw variability and seasonal breakup and their anticipated effects on water levels, the mushkeg, or broader watershed dynamics. The failure to meaningfully assess how these cycles, in combination with climate change, may interact with project activities limits consideration of the potential effects on mushkeg and downstream environments. The Friends submit that particular consideration of these impacts is necessary to ensure that the ecological and hydrological functioning of mushkeg ecosystems is adequately characterized and reflected in the impact assessment process. Recommendation No. 8: The IS must give detailed consideration to seasonal freeze/thaw patterns and breakup processes in the context of climate change. The assessment must evaluate how climate-related changes may interact with valued components, including the	well as increasing inspection and monitoring frequency during and after the heavy rainfall and flooding events. While the Peatlands Technical Support Document (Appendix I) states that permanent bridges along the Community Access Road will be designed to accommodate increased flooding and rainfall under expected and anticipated climate change conditions. B) The Environmental Assessment / Impact Statement and the Technical Support Documents were developed to meet the requirements of the Terms of Reference, the Tailored Impact Statement Guidelines and the discipline-specific study plans. The development of a detailed consideration to seasonal freeze/thaw patterns and breakup processes in the context of climate change is not a regulatory requirement and as such was not developed as part of the Environmental Assessment / Impact Statement.	

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		physical environment, hydrological systems, and human health.		
Friends of the Attawapiskat River	2	II. GAPS IN THE IMPACT STATEMENT d. Characterization of Wetlands & Inclusion of Mushkeg The Guidelines require that the IS describe the "environmental significance and value of the geographical setting in which the Project will take place and the study areas,"²³ and "environmentally sensitive areas, such as [...] ecological reserves, ecologically and biologically sensitive areas, wetlands, and habitats of federally or provincially listed species at risk and other sensitive areas."²⁴ The Guidelines further required the proponent to "quantify, delineate and describe wetlands (fens, marshes, peat lands, bogs, etc.) within the local study area potentially directly, indirectly and/or cumulatively effected by the Project."²⁵ In the Friends' previous submission, concerns were raised regarding the significance of the mushkeg in this region and how the project needs to be framed in terms of water flow, connectivity, and the unique cultural, ecological, and hydrological cycles that define it. While the IS assesses the peatland ecosystems across various residual effects,²⁶ the Friends submit that it does not assess these lands in a way that captures their	The Final EA/IS and the Technical Support Documents were prepared to meet the requirements outlined in the Terms of Reference, the Tailored Impact Statement Guidelines and the technical discipline-specific study plans. The Ministry of the Environment, Conservation and Parks will determine if the Final EA/IS meets the provincial requirements, while the Agency will determine if the EA/IS meets the information gathering requirements of the TISG, and the Minister or Cabinet will make a determination based on the key issues under federal jurisdiction. The decision to prepare a separate Study Plan and undertake a stand-alone effects assessment for Peatland Ecosystems (i.e., muskeg), was in recognition of the importance of muskeg to the people of the region, as well as on a global scale. Appendix I - Peatlands Technical Support Document acknowledges the importance of these habitats, and recognizes and considers various functions including water storage, groundwater recharge, climate regulation, water quality treatment, nutrient / organic export, carbon sequestration / storage, and biodiversity and biological productivity across different peatland types wherein the Community Access Road is	970

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		ecological and cultural significance. For example, this ecosystem “ is a nursery for biodiversity, supporting threatened species like woodland caribou, wolverine, and sturgeon, as well as a sanctuary for hundreds of migratory birds .”²⁷ Moreover, protecting these lands is “not only crucial for meeting climate goals and conserving biodiversity, but also for upholding Indigenous peoples’ rights and heritage.”²⁸ In the IS, one community highlighted how “the meaning of Omushkegowuk (the people of the muskeg), speaks to the central importance of the muskeg to the community’s lives and well-being.”²⁹ Another community member noted the interconnectedness of muskeg and the environment, stating that “the muskeg is just like our bodies, if we get sick, and then the whole body gets sick.”³⁰ The Friends submit that these perspectives have not been meaningfully integrated into the assessment, and the IS must be informed by this understanding. As we shared above and reiterate, the Attawapiskat River and its peatlands are central to the exercise of Indigenous rights and to the well-being of communities that depend on it. The river is not isolated; rather, it forms part of an interconnected watershed system in which water flows across mushkeg and peatlands of the Hudson Bay – James Bay Lowlands before discharging into the Arctic Ocean. The interconnected nature of this	proposed. In the Assessment of Significance section (Section 7.3.3) of Appendix I, residual changes to Peatland Ecosystems due to changes in groundwater that may alter drainage patterns, groundwater regimes, or groundwater quality was considered Significant due to high uncertainty related to an acknowledged lack of a full understanding of Peatland Ecosystem hydrology and hydrogeology in the Effects Assessment Local and Regional Study Areas, as well as uncertainty regarding the key design-related mitigation measure (i.e., the “floating road”). Further studies of peatlands are proposed for the pre-construction phases of the Community Access Road and the intent is to engage in meaningful consultation with affected Indigenous communities through the Environmental Advisory Committees.	

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		ecosystem means that disturbances in one location will carry downstream, with significant consequences to ecosystems, food systems, and communities far beyond a project's immediate footprint. In mushkeg, water flows under the land. Fish also travel 'under the land' by using tunnels carved into the mushkeg. As one Elder within the Friends has described, 'we are the water people. The swamps and lakes create mushkeg – it's a being.' As another community member within the Friends remarked, "the mushkeg is living and breathing. For us, it is our Amazon. It cleans the air, the water – it's a big lung and filter for everything." Mushkeg does not function as a linear corridor. Instead, it acts like a sponge in which water courses, water crossings, and delineations between water bodies do not neatly form. These characteristics and the uniqueness of the mushkeg must be reflected throughout this impact assessment process. Recommendation No. 7: The MFCAR is located in globally significant peatlands (ie, mushkeg). The IS must explicitly recognize mushkeg as a distinct ecological, hydrological, and culturally significant system and assess projects' effects on valued components accordingly.		
Friends of the Attawapiskat	2	II. GAPS IN THE IMPACT STATEMENT c. Regional Assessment and Project Scoping	The Regional Assessment's reporting timeline did not align with the Community Access Road	969

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River		The Guidelines provide that where an ongoing or completed regional assessment exists in the proposed project area, proponents are expected to use information generated through that process to inform the cumulative effects assessment, consistent with section 22(1)(q) of the IAA. The Friends submit that the IS does not meaningfully demonstrate how the federal regional assessment for the Ring of Fire region has or will inform the scoping or evaluation of the project's effects, despite the MFCAR's integral connection to broader mineral development anticipated within the region. Recommendation No. 6: The IS must be aligned with and informed by the federal Regional Assessment for the Ring of Fire region to ensure that cumulative and regional effects are properly understood and considered before decision-making.	EA/IS schedule, so we could not incorporate its materials. The Regional Assessment Interim Report was released in February 2026, while the cutoff for inclusion in the Final EA/IS was September 2025. This cutoff date is a crucial requirement for technical disciplines who need to assess effects, and is standard practice in cumulative effects assessment. The Regional Assessment framework states that it will address cumulative and interactive effects, and will therefore include projects such as the Community Access Road in its assessment. It further acknowledges that induced effects on the broader region fall outside the scope of project-specific assessments such as the Community Access Road. Additionally the Regional Assessment Interim Report does not present findings, it summarizes progress to date on development of the assessment scope of work and outlines the Regional Assessment team's goals. It does not provide information that we would be able to integrate into our reporting and as such no update to the Final EA/IS where made.	
Friends of the Attawapiskat River	2	II. GAPS IN THE IMPACT STATEMENT b. Purpose and Scope of Project In response to the Guidelines, the Friends recommended that the scope of the	Following the guidance of the IAAC Policy Framework for Assessing Cumulative Effects under the Impact Assessment Act, the EA/IS includes information on projects which have	968

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		assessment apply to all reasonably foreseeable projects that may result from or rely on the construction of the MFCAR. The Friends noted that, as drafted, these developments were referenced in the context of a potential cumulative effects assessment, rather than integrated across the full scope of the Guidelines considerations and requirements. The Friends specifically identified the following reasonably foreseeable developments: - Construction of upgrades to the Anaconda/Painter Lake Forestry Road; - The construction and operation of the Northern Road Link (proposed road linking the northern portion of the Marten Falls Community Access Road to the Ring of Fire area); - A potential East-West Road; - The Eagle's Nest Mine; - Mining activities associated with the following deposits: Black Thor, BlackBird, Big Daddy, Black Label; - Increased winter road traffic during Operations and Maintenance by future mining proponents; and - Advanced mineral exploration activities in the Ring of Fire area. While the IS does consider many of these developments,²¹ their treatment remains confined to the cumulative effects assessment. The IS does not adequately integrate these	publicly available information and which are reasonably foreseeable activities. We are unable to assess effects of projects that do not have a reasonably foreseeable footprint or activities.	

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		developments into the broader assessment of the project's purpose and scope. Moreover, it does not evaluate the broader changes that the project will enable. Recommendation No. 5: The IS must expand the scope of the assessment to meaningfully evaluate reasonably foreseeable projects and activities enabled by the MFCAR, including how the project may facilitate or accelerate those developments and contribute to broader regional transformation. The assessment must include, but is not limited to, mining activities associated with the Eagle's Nest, Black Thor, Black Bird, Big Daddy, and Black Label deposits, increased winter road traffic during operations by future mining proponents, and advanced mineral exploration.		
Friends of the Attawapiskat River	2	Recommendation No. 4: The impact assessment process must demonstrate how the comments received for this project have informed the assessment findings and decision-making to ensure transparency and maintain confidence in the process.	Consultation for the Community Access Road has been conducted in accordance with the Terms of Reference and the Tailored Impact Statement Guidelines and has been ongoing since 2019. Engagement with Indigenous communities, was initiated early and carried out throughout the EA/IA process to inform design, effects assessment, and mitigation measures. Section 11.7.2 outlines consultation and engagement with Indigenous communities and includes a variety of activities from webinars and videos, in-person meetings and	967

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			provincially-supported forums for Indigenous communities to engage on the Community Access Road. The following key highlights demonstrate how input from Indigenous communities helped shape the planning of the Community Access Road: - Section 4 of the Final EA/IS describes how community input influenced the route selection process and the selection of the Preferred Alternative. - A total of 1,079 comments were received from Indigenous Communities on the Draft EA/IS. Comments and responses to the feedback received on the Draft EA/IS, including how each was considered, is documented in the Feedback and Response Log in Appendix C. The log lists the comment submitted, the responses to specific comments, and where those changes appear in the Final EA/IS, if applicable. - The Record of Consultation and Engagement (RoCE) documents how input from Indigenous communities, government agencies, and interested persons was sought, received, and considered. The reporting timeframe started with release of the Notice of Commencement of Environmental Assessment on October 29, 2021, and ended on September 5, 2025. The ROCE consists of various Milestone Reports,	

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			these were provided to communities for their review and updated with their feedback. - Throughout the refinement of the EA/IS, the draft materials were updated to incorporate Indigenous Knowledge and to address comments received during the Draft EA/IS review period. The final version includes updated summaries and findings within the Technical Support Documents provided in the appendices. The information used to inform reporting related to the water, land and people disciplines is summarized in Tables 8.1-1, 8.2-1, 8.3-1, respectively. Additionally, 23 individual community-specific Aboriginal and / or Treaty Rights and Interests (ATRI) reports were developed instead of one overarching ATRI report. The following steps were undertaken to gather feedback from Communities: 1) Two ATRI forums were held that were exclusive to Indigenous community representatives and elders. 2) Draft existing conditions sections of the ATRI reports were prepared and sent to communities for their review. Sections were updated based on feedback received. 3) Draft ATRI Impact Assessment reports were prepared and sent to communities for review and feedback. Individual community-specific ATRI Impact Assessment reports will be finalized in May 2026.	

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Friends of the Attawapiskat River	2	Recommendation No. 3: Information sharing must reach beyond leadership to community members and Indigenous rights-holders. This is critical to build trust in the Agency, Canada, and the proponent's intended developments.	Marten Falls First Nation agrees that effective information sharing must extend beyond formal leadership structures to include community members and Indigenous rights-holders. Marten Falls First Nation worked with each Indigenous community's preference for how they would like to be consulted and engaged and were open to custom consultation plans and protocols. As part of this approach, they identified key contacts within each Indigenous community to serve as the primary points of communication for the Community Access Road, responsible for receiving information and sharing it with their respective community members. To strengthen this approach, a Community Coordinator Program, with funding, was developed to support the participation of specific Indigenous community members in consultation and engagement activities for the Community Access Road. This program was designed to assist participation in the Assessment Process in ways that worked best for each community. Community Coordinators were envisioned to support Community Access Road consultation and engagement activities, meetings, and events by helping collect input from community members to share with the Project Team for inclusion in the Assessment Process.	966

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			Refer to response 1 for additional information on Marten Falls consultation and engagement efforts. The comment relating to building trust in the Agency is directed at government agencies and outside the scope of the Community Access Road. We would therefore encourage you to direct these to the regulators, as they will be best positioned to address them.	
Friends of the Attawapiskat River	2	Recommendation No. 2: All engagement activities must be conducted in both English and Cree, and in the community chosen by the Indigenous organization or nation. For instance, recognizing that many community members live off-reserve, efforts must be made to ensure that all community members have an opportunity to be informed and aware, to participate, and to influence Impact Assessment outcomes.	The proponent recognizes and supports the importance of inclusive, accessible, and culturally appropriate engagement, including the use of a Community's preferred language where possible and meeting communities in locations that best support participation. From the outset of the Assessment Process, MFFN has made sustained efforts to translate project materials, clearly communicate a willingness to meet at times and locations convenient to Indigenous communities, and remain responsive to requests for additional engagement. Engagement activities have been held in multiple locations including Timmins, Geraldton, and Thunder Bay, Ontario to better accommodate off-reserve community members. Online engagement opportunities have also been offered for individuals who are unable to travel or participate in person.	965

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			Translators were made available at all four Forums related to the Community Access Road. In support of the release of the Draft and Final EA/IS, the Notice of Submission, Executive Summary, and Plain Language Summaries of the technical reports were translated into Cree, Oji-Cree, and Ojibway to help reduce language barriers and support meaningful participation. The proponent remains committed to continued dialogue and to working collaboratively with Indigenous communities to identify engagement approaches that best meet their needs moving forward.	
Friends of the Attawapiskat River	2	Recommendation No. 1: All engagement processes must enable the full and fair participation of Indigenous community members, including women, elders, and youth, and any decision-making must be undertaken with their consent, in keeping with their customs, worldviews and inherent laws.	Consultation for the Community Access Road has been conducted in accordance with the Terms of Reference and the Tailored Impact Statement Guidelines and has been ongoing since 2019. Engagement with Indigenous communities was initiated early and continued throughout the Assessment Process to support inclusive and meaningful participation and to inform Project design, effects assessment, and mitigation. As described in Section 11.7.2 of the Final EA/IS, consultation and engagement activities were designed to be inclusive, accessible, and responsive to the needs and priorities identified by Indigenous communities. Engagement	964

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			included a range of interactive formats, such as community meetings, workshops, webinars, virtual meetings, and provincially supported forums, providing multiple opportunities for community members to participate. These approaches were intended to support the inclusion of diverse perspectives, including those of women, Elders, and youth, and included culturally appropriate engagement formats, flexible participation options, and the provision of translated and plain-language materials to support accessibility and understanding. Additional details on specific engagement activities for women, Elders and youth can be found in Section 11.8 of the Final EA/IS. Engagement is expected to continue, in subsequent phases of the Project and will be informed through ongoing dialogue with Indigenous communities regarding preferred engagement approaches, consistent with community values and governance structures and within applicable regulatory frameworks.	
Friends of the Attawapiskat River	2	II. GAPS IN THE IMPACT STATEMENT We remind the Agency that consultation requires, at a minimum, “sufficient time to participate in consultation, including the review of technical information.”¹⁴ In <i>Tsleil-Waututh Nation v. Canada</i>,¹⁵ the Federal Court of Appeal confirmed that “meaningful dialogue”	These comments are directed at government agencies and outside the scope of the Community Access Road. We would therefore encourage you to direct these to the regulators, as they will be best positioned to address them.	963

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		requires more than simply receiving and understanding the concerns of affected Indigenous applicants, but rather “a considered, meaningful two-way dialogue” ¹⁶ that grapples with the real concerns of the Indigenous applicants so as to explore possible accommodation of those concerns.		
Friends of the Attawapiskat River	2	II. GAPS IN THE IMPACT STATEMENT a. Public Engagement and Information Sharing The Guidelines require that the proponent “demonstrate that they have meaningfully engaged with local communities, technical experts, the public, associations and stakeholders,” while “prioritiz[ing] the participation of those who are most affected by the proposed project, while also ensuring that interested members of the public have an opportunity to share their views.” Meaningful public participation is also a core purpose of the IAA,¹¹ which seeks to ensure that Indigenous peoples whose rights may be affected are provided appropriate opportunities to participate in the process. Despite these safeguards, we are not confident that the participation opportunities provided thus far have created a space for Indigenous legal traditions, worldviews, and natural laws to inform the assessment of a project’s impacts. The IS outlines a range of engagement initiatives undertaken by the Proponent, including hosting in-person “meetings,	Consultation for the Community Access Road has been conducted in accordance with the Terms of Reference and the Tailored Impact Statement Guidelines and has been ongoing since 2019. Engagement with Indigenous communities, was initiated early and carried out throughout the EA/IA process to inform design, effects assessment, and mitigation measures. The Record of Consultation and Engagement (RoCE) documents how input from the 23 Indigenous communities engaged was sought, received, and considered. The ROCE consists of four Milestone Progress Reports, these were provided to communities for their review and updated with their feedback. Each Progress report summaries engagement and appends full records of emails exchanged and meeting minutes where applicable and is searchable on the EA/IS website by Indigenous Community name. Section 11.7.2 of the Final EA/IS outlines	962

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		activities and workshops” and a youth engagement program. While these efforts are acknowledged, the Friends submit that the IS merely describes engagement activities without demonstrating how these activities enabled meaningful participation or informed consideration of community concerns. It remains unclear how the concerns raised by Indigenous participants were substantively considered or incorporated into the assessment.	consultation and engagement with Indigenous communities and includes a variety of activities and tools used to engage with Indigenous communities on the Community Access Road. Table 11-8 summarizes the topics discussed during meetings with MFFN. Table 11-9 summarizes the input and Information received from Indigenous communities and their Influence on Milestones 1, 2, 3, and 4. Section 4 of the Final EA/IS describes the direct impact of community input on the route selection process and the selection of the Preferred Alternative. Indigenous communities were provided a 120-day review period for the Draft EA/IS and over 1,900 comments were received. Comments and responses to the feedback received on the Draft EA/IS, including how each was considered, is documented in the Feedback and Response Log in Appendix C. The log lists the comment submitted, the response to that comment, and where those changes appear in the Final EA/IS, if changes were necessary. Indigenous Knowledge was considered in the EA/IS through the Indigenous Knowledge Program. We began communicating with Indigenous communities in December 2019, and Project funding support for those communities who have expressed an interest in participating in the IK Program began in the	

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			summer of 2021. The information used to inform reporting related to the water, land and people disciplines is summarized in Tables 8.1-1, 8.2-1, 8.3-1, respectively.	
Friends of the Attawapiskat River	2	II. GAPS IN THE IMPACT STATEMENT k. Community Health and Risk Assessment The Guidelines provide that the proponent must conduct a preliminary model to determine whether a Human Health Risk Assessment is required.⁵⁵ The Guidelines further require the IS to assess and quantify health risks from contaminants of potential concern, including mercury, through pathways such as the “consumption of country foods and differential risk for vulnerable subgroups.”⁵⁶ Among the most repeated concerns we hear about from our members and during community gatherings is the need to study cumulative effects on human health, which include both existing contaminated sites and future health impacts or exposures. We know that harm to the land is harm to health and well-being, and already, we live with a high incidence of cancers and skin conditions in the communities. Ensuring the project is measured in light of its impacts on community health is vital to building trust and ensuring an open, transparent decision-making process. As we stated and shared with the Agency as part of our Declaration of Protection for our Lands and Waters:	The Final Environmental Assessment / Impact Statement (EA/IS) and associated Technical Support Documents were prepared to meet the requirements of the Terms of Reference, the Tailored Impact Statement Guidelines, and the applicable discipline-specific study plans. Section 16.1 of the Tailored Impact Statement Guidelines requires that the Impact Statement conduct a problem formulation exercise to determine whether a Human Health Risk Assessment (HHRA) is required, and to provide a rationale where the problem formulation indicates that a HHRA is not warranted. Consistent with this requirement, the Final Human Health and Community Safety Study Plan states that a quantitative HHRA would be undertaken only if the problem formulation determined that such an assessment was required. The Terms of Reference include Human Health and Community Safety as an EA discipline, with potential effects related to changes in air quality, noise, and water quality; changes to public health and community safety; changes to diet; and changes to access to health and	977

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		The health of these lands and waters are vital to maintaining our connection to our ancestors and to the land, water and wildlife; Crown interest and short-term business interests cannot continue to be prioritized over the health, lands, and Natural Laws of Indigenous communities.⁵⁷ In our previous submission on the Guidelines, the Friends requested a study of mercury impacts on human health and the environment that considers the full lifecycle of the project, including legacy contamination. This assessment aligns with Canada's commitments under the Minamata Convention to protect human health and the environment from anthropogenic emissions of mercury and its compounds. While the IS includes a Problem Formulation for Human Health Risk Assessment (Appendix T), it does not include the aforementioned study of mercury on human health.⁵⁸ Notably, the Problem Formulation indicates that water samples collected in the Albany River had exceeded drinking water standards for mercury⁵⁹ and identifies historical issues, such as boil water advisories for Marten Falls First Nation.⁶⁰ The document further states that "historical health information will be considered in the description of baseline health conditions of communities in the Community Health LSA."⁶¹ However, these considerations are not clearly integrated into a comprehensive	emergency services. The Terms of Reference do not include a requirement for a quantitative HHRA or a mercury-specific human health study. A Problem Formulation was completed and provided as Attachment A of Appendix T: Final Community Wellbeing Technical Support Document. This problem formulation considered contaminants of potential concern, including mercury, relevant exposure pathways, and baseline community health context. Based on the conclusions of the problem formulation, progression to a quantitative HHRA was not warranted. Future monitoring recommendations are provided in Section 9 of Appendix T, including air, surface water, and soil monitoring, to support the identification of potential effects related to environmental disruption and human health over time.	

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		Human Health Risk Assessment. The Friends submit that this approach does not sufficiently consider cumulative or long-term contamination pathways, including mercury movement within wetlands and interconnected hydrological systems, particularly in light of existing community health concerns and legacy environmental contamination. Recommendation No. 14: The IS must be updated to require a study of mercury impacts on human health and the environment that takes into account the proposed project and legacy contamination.		
Friends of the Attawapiskat River	2	II. GAPS IN THE IMPACT STATEMENT I. Emergency Preparedness and Accountability As one of the purposes of the MFCAR is to facilitate mineral development in the Ring of Fire, the Friends submit that it is critical to consider the emergency response capacity of communities downstream of the proposed projects. The Guidelines require the IS to: [D]escribe Emergency Communications Plans that would provide emergency instructions to surrounding communities. Procedures should include a combination of urgent immediate actions, such as public notification of safety issues, shelter-in-place and evacuation directions, as well as longer term actions such as general website and hotlines, incident	Response to No. 15: A Climate Adaptation and Resiliency Technical Support Document was prepared in support of the Final EA/IS and is included in Appendix Y. The methodology is outlined in Section 4, specifically Section 4.4.2 deals with existing climate data analysis methodology. It explains how the meteorological data was approached, including the period data for 1985. Table 6-2 of Appendix Y presents a breakdown of the risk scoring for the individual interactions of weather/climate events, such as extreme daily rainfall and assets, such as culverts and bridges. Of the interactions that resulted in exposure, only the interactions of moderate-	978

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		status updates, injured wildlife reporting, etc. as appropriate. Include a description of efforts that will be taken to invite public feedback on emergency response plans;⁶² The Friends submit that these requirements apply directly to downstream communities, who may be affected by flooding, infrastructure failure, and other project-related emergencies. During our community gatherings and amongst our members, we frequently hear about the severe flooding which occurred in 1985. In the Friends' previous submission, it was requested that lessons learned from the Flood of 1985 be expressly considered and adopted into the Guidelines' approach to emergency response.⁶³ The risks associated with breakup, including dyke erosion and the failure of infrastructure such as culverts, must be accounted for in the review of emergency preparedness. The impact of climate change on increasing the frequency and severity of flooding, as well as 'worst-case scenarios,' must also be considered. The Friends also reiterate concerns previously raised in our submissions that emergency preparedness measures not be decided upon without first hearing from and incorporating local knowledge from communities with experience with breakup conditions, climate-related impacts, and accidents. The proponent must therefore provide opportunities for Indigenous rights-holders' input into the	risk and high-risk were carried to the next part of the analysis. These selected interactions were further analyzed to recommend risk treatment and adaptation measures. Tables 7-1 and 7-2 of Appendix Y present adaptation measures/risk treatment for construction and operations. These include extreme daily rainfall with adaptation measures/risk treatment for culverts and bridges. Response to No. 16: The preparation of emergency response and preparedness measures will be the responsibility of the future owner/operator of the Community Access Road. The community-specific ATRI Impact Assessment Reports proposed mitigation measures include the collaboration with local existing environmental advisory committees to support the development and implementation of all environmental monitoring programs. The objective is to include Indigenous interests and perspectives, particularly concerning resources utilized for rights-based purposes. In the absence of an existing advisory committee with an aligned mandate to Marten Falls First Nation, a Terms of Reference between relevant agencies and the community will be established. Communities via these committees can request a copy of the emergency response and	

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		development of emergency response and preparedness measures, as well as mechanisms for ongoing review and updates. These plans must be communicated through a robust Indigenous rights-holders' awareness campaign. The effectiveness of emergency preparedness is directly tied to the level of awareness and preparedness of local residents before any accident or emergency. Notably, the IS contains no express mention of the Flood of 1985 and does not indicate that lessons learned from previous flooding have informed the scope of the assessment. While there are references to construction-level mitigation measures, design considerations, and accidents or malfunctions related 63 to weather and flood-like conditions,64 the IS does not include a clear description of emergency response or preparedness measures for community flooding, nor does it mention how these measures will be developed or implemented. It also does not demonstrate how Indigenous rights-holders' input has informed emergency preparedness planning or how emergency response plans will be communicated to potentially affected communities. As members of downstream communities, the Friends submit that greater clarity is required regarding	preparedness measures.	

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		emergency preparedness measures to ensure potentially affected communities are adequately informed and prepared in the event of project-related emergencies. Recommendation No. 15: Emergency preparedness planning, as outlined in the IS, must incorporate lessons learned from the 1985 Flood, including risks associated with seasonal breakup, dyke erosion, and the failure of infrastructure such as culverts. The impact of climate change on the frequency and severity of flooding, as well as 'worst-case scenarios', must also be taken into account in understanding impacts to rights and the environment. Recommendation No. 16: The Proponent must invite feedback from Indigenous communities on emergency response and preparedness measures and ensure opportunities for ongoing review and update. These plans must be communicated through a robust Indigenous rights-holders' awareness campaign.		