

January 28, 2020

VIA EMAIL

Impact Assessment Agency of Canada
22nd Floor, Place Bell
160 Elgin Street
Ottawa ON K1A 0H3

**Re: Webequie Supply Road Project and Marten Falls Access Road
Comments on the draft Tailored Impact Statement Guidelines and draft Indigenous
Engagement Plan**

The Friends of the Attawapiskat River (the “Friends”), represented by the Canadian Environmental Law Association (“CELA”), welcome this opportunity to provide comments and recommendations to the Impact Assessment Agency of Canada’s (the “Agency”) on its draft Tailored Impact Statement Guidelines (“Guidelines”) and draft Indigenous Engagement Plan for the Webequie Supply Road and Marten Falls Community Access Road.¹ Unless otherwise specified, this submission applies to the impact assessments (IAs) for both road projects.

In making these submissions to the Agency, the Friends note they are not speaking on behalf of any of the communities or its leadership where its members are based (Neskantaga, Peawanuck, Kashechewan and Fort Albany First Nations), but rather sharing the views, concerns and messages heard during a series of in-community discussions and workshops held during January 2020. Furthermore, our comments do not constitute consultation in any way, nor discharge the Crown’s duty to consult per section 35 of the *Constitution Act, 1982*.

I. BACKGROUND

(a) The Friends of the Attawapiskat River

The Friends of the Attawapiskat River (the “Friends”) is a community-led organization comprised of members and elders from Attawapiskat and surrounding communities, including Neskantaga, Peawanuck, Kashechewan and Fort Albany First Nations. The Friends aim to advance knowledge about the Ring of Fire in the Attawapiskat watershed and also enable

¹ Webequie Supply Road Project, online: <https://ceaa-acee.gc.ca/050/evaluations/proj/80183?culture=en-CA>; Marten Falls Community Access Road Project, online: <https://iaac-aeic.gc.ca/050/evaluations/proj/80184?culture=en-CA>

community participation in decision-making processes which impact the health of the Attawapiskat River.

The Friends recognize that the Attawapiskat River has been our provider since the beginning of time. It is where community members go to harvest food and trees to make shelter, and follow the wildlife, as it migrates and travels along the water. The water is part of life and is the veins of the Mother Earth. The ecosystem is part of this, with its own purpose which we respect without question.

Once this water is disturbed, we have no means of reversing it to its present state – to the way it was before resource development. If developed, the Ring of Fire will have a hugely negative impact on our way of life, existence and livelihoods. We do not own the land, but rather have a responsibility to ensure we live in harmony with it, its animals and water; this is how we survive.

Those who live here are the water people. As our youth describe it, they are the ‘*youth of the mushkeg*.’ If you look closely throughout our watershed, you will also see we are surrounded with water and through it, connected to the many lakes, rivers, swamp (mushkeg) and the ocean. Our goal, with this submission, is to improve upon the requirements currently set by the Agency to ensure the Attawapiskat River – the water on which our life depends - is protected.

(b) The Canadian Environmental Law Association

The Friends have retained the Canadian Environmental Law Association to facilitate their involvement in the Agency’s IA process. CELA is a public interest legal clinic funded by Legal Aid Ontario which for nearly 50 years has provided legal services to low-income communities and those disproportionately affected by environmental pollutants and injustices. CELA, invited by the Friends, attended the in-person workshops held in January 2020.

CELA has participated in a range of administrative and legal proceedings under *CEAA 2012* and its predecessors, *CEAA 1992* and the *Environmental Assessment and Review Process Guidelines Order*. On the basis of our decades-long experience in assessment matters, CELA has carefully considered the draft Guidelines and draft Indigenous Engagement plan provided by the Agency from a public interest perspective. Our recommendations below, build on CELA’s related concerns about other environmental assessment law matters such as the *Impact Assessment Act* (IAA), as highlighted in recent submissions to Environment Climate Change Canada (ECCC) regarding the revised Projects List² and briefing notes for the purpose of public legal education.³

² Canadian Environmental Law Association, “Submissions to the Government of Canada Regarding *Discussion Paper on the Proposed Project List* and *Discussion Paper on Information Requirements and Time Management Regulatory Proposal*,” (29 May 2019), online: <https://www.impactassessmentregulations.ca/8866/documents/16609/download>

³ Canadian Environmental Law Association, “Briefing Note on Bill C-69: Overview of Canada’s New *Impact Assessment Act*,” (28 August 2019), online: <https://cela.ca/wp-content/uploads/2019/08/1289-IAA-Briefing-Note-August-6-2019.pdf>

(c) Our Approach to Engagement

In an effort to gather community feedback on the Agency's draft Guidelines and Indigenous Engagement Plan, the Friends visited the communities of Timmins, Fort Albany, Kashechewan and Attawapiskat from January 15-20, 2020.

This submission from the Friends is a compilation of the messages and views we heard directly from leadership, community members, elders and youth during our week-long tour to James Bay communities. Travelling over 600 km from Timmins to Attawapiskat by seasonal winter and ice roads, the Friends visited elders, community members and youth to collect their feedback.

The Friends spoke in community centres, meeting rooms and classrooms and engaged at all times of day, from daytime, evening and weekends to be as accessible as possible. While recognizing we could not reach all those interested given the short notice for the public comments and the limitation of a 40-day comment period, best efforts were made to ensure those interested in learning more and wishing to share their input with the Agency had an opportunity to do so. In all, we met with over 100 individuals and reached out to media so that the public, more generally, was also aware of this opportunity to comment.⁴

(d) Inadequacy of Information Sharing & Engagement by the Agency

The Friends experienced a high level of interest in the Ring of Fire and the proposed roads' IAs during all community sessions. However, all of the communities we visited displayed a clear lack of knowledge about the federal IA process and its commencement in relation to the Webequie and Marten Falls roads.

Further, we are disappointed by the Agency's inability to meet with the Friends and participate in our in-community sessions. The Friends first reached out to the Agency in November 2019, requesting an in-community meeting with community members (*see Appendix 1*). While the Agency responded that an in-community meeting would occur that month and they would also travel during the public consultation during January 2020, neither of the visits occurred and reasons as to why, not provided.

Our invite to visit was repeated to the Agency upon notice of the 40-day public comment period on December 20, 2019 and this too, was declined. While the Agency welcomed the Friends to either attend in-person or Webex public open houses in Thunder Bay and Geraldton, we note these are not sufficient alternatives to in-community visits. First, travel is cost prohibitive as the Friends' membership live in fly-in communities where it costs thousands to travel by air.

⁴ CBC News "Ring of Fire communities get chance to share concerns with federal government" (16 Jan 2020), online: <https://www.cbc.ca/news/canada/sudbury/communities-ring-fire-1.5429812>

Secondly, Webex is not accessible due to insufficient internet bandwidth and a lack of mobile networks in many of the communities.

The Friends remain disappointed by the Agency's consultation with communities in the Attawapiskat watershed. While the Agency stated to us that they are "actively working with leadership" in many of the communities we visited, the level of awareness about the projects and the commencement of the IAs is critically lacking. This was affirmed by the comments received during the Friends' workshops.

Further, while the Friends appreciate this opportunity to provide comments to the Agency, we reiterate our displeasure at the Agency for choosing to commence a 40-day comment period without first consulting the community. As we have previously communicated to the Agency, commencing a 40-day comment period in light of a youth suicide and death of an elder, critically diminishes our ability and collective capacity to respond.

Moving ahead with decision-making without first ensuring communities have the requisite background knowledge and ability to respond does not respect our rights to equal involvement and engagement in this process. Had the Agency chosen to pre-emptively engage, in the spirit of early engagement, the burden of having to respond within a 40-day window would have been lessened. Given these constraints, the Friends reserve the right to provide further comment in relation to the above noted projects as we continue to assess the impacts of the projects and carry out community outreach efforts.

II. SPECIFIC RECOMMENDATIONS TO THE AGENCY

In response to the draft Guidelines and draft Indigenous Engagement Plan, the Friends make the following observations and accompanying recommendations to the Agency (*see Appendix 2*).

(a) Draft Tailored Impact Statement Guidelines

1. Scope of Project & Applicability of Guidelines

The project description for both the Webequie Supply Road and Marten Falls Community Access Road state that these roads may enable mineral development in the Ring of Fire area.⁵ Unfortunately however, as currently drafted the Guidelines only apply to the more narrow, project-level assessment for the two individual roads. The Friends do not support this narrow framing.

⁵ See online: <https://iaac-aeic.gc.ca/050/evaluations/proj/80184?culture=en-CA> and <https://ceaa-acee.gc.ca/050/evaluations/proj/80183?culture=en-CA>

Further, during our in-community discussions, the Friends were made acutely aware of the concerns shared by community members who live downstream of the proposed Ring of Fire. There was a collective view that a piecemeal approach to decision-making - wherein the effects of the proposed supply and access roads are viewed in isolation of the potential range of adverse affects resulting from the Ring of Fire – was an inadequate means to advancing reconciliation with Indigenous communities and environmental rights. As one participant echoed, there is ‘*no too small a scope*’ given the magnitude of mining activities which could be facilitated by the proposed roads.

Therefore, we recommend the Guidelines’ scope be expanded to apply to other reasonably foreseeable projects resulting from these projects. As currently drafted, the following list of projects are only mentioned in the context of the proponents ‘cumulative effects assessment,’⁶ should it be undertaken. We instead ask this list of projects be applicable to all of the Guidelines’ considerations and requirements:

- 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.

RECOMMENDATION NO. 1: Expand the Guidelines’ scope so that is applies to other reasonably foreseeable projects resulting from these road projects, including mining activities associated with the Black Thor, BlackBird, Big Daddy, and Black Label deposits, increased winter road traffic during operations by future mining proponents, and advanced mineral exploration. These projects should not only be considered during the proponent’s cumulative effects assessment.

2. Characterization of Wetlands & Inclusion of Mushkeg

The draft Guidelines provide numerous references to mapping water flow and connectivity among watercourses and detailing changes which may occur, through nutrient loading or

⁶ Draft Guidelines, s 22

disturbance.⁷ What is not adequately reflected however, is how the waterways in this predominantly mushkeg environment function. Currently, the draft Guidelines only make a single reference to “muskeg.” While the Guidelines make repeated reference to wetlands, this is too broad a term to capture the ecological and cultural significance held by mushkeg in this region.

As community members described, in mushkeg, water flows under the land. Fish also travel ‘*under the land*’ by making use of tunnels carved within the mushkeg. As one elder described, ‘*we are the water people. The swamps and lakes create mushkeg – it’s a being.*’ As another community member 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.*’

Further, mushkeg is not a linear corridor. It acts like a sponge and so water courses, water crossing and delineations between water bodies do not neatly form. We encourage the uniqueness of this ecosystem be better reflected throughout the Guidelines.

RECOMMENDATION NO. 2: The projects are located in global significantly peatlands (ie. mushkeg). As the draft Guidelines’ framing of water flow, connectivity and water crossings does not adequately reflect the unique ecological and hydrological cycles of this region, it is necessary to update considerations required within the project description (s 3) and effects to valued components (s 15).

3. Water Level Changes & Current Stressors

In addition to the draft Guidelines’ references to mapping of water flows and connectivity, references are made to water level changes, seasonal variations and accompanying spatial and temporal effects to ground water.⁸ What is not expressly considered however, is the effect of breakup in the spring on mushkeg water levels. Indeed, freeze/thaw is only referenced once in the Guidelines.⁹

The effect of seasonal variations and breakup in light of climate change, is also an area not identified in the draft Guidelines. As participants remarked, those living in the Attawapiskat watershed have already observed inland lakes subsiding. Thus, a review of water levels in light of climate change and the Ring of Fire’s footprint is critical.

Further, while climate change is repeatedly mentioned throughout the draft Guidelines, it is primarily in the context of the proposed project’s contribution to greenhouse gas emissions and

⁷ Draft Guidelines, ss 3.1, 8.6, 8.7, 15.1

⁸ Draft Guidelines, ss. 8.1, 8.6, 8.9

⁹ Draft Guidelines, s 8.6

Canada's climate commitments. The intersection of climate change *with* valued components like changes to the physical environment, the environment and human health is a critical deficiency which should be remedied.

RECOMMENDATION NO. 3: Greater consideration of breakup and seasonal freeze/thaw patterns in light of climate change should be studied. Effects of climate change *with* valued components like the physical environment, the environment and human should be included in the Impact Statement.

5. Intergenerational Effects & Characterizing the Severity of Impacts

The draft Guidelines state that proponents are “encouraged” to include a description of intergenerational impacts of the project on community members.¹⁰ Impacts on “generations” is again referenced in regard to the Impact Statement’s characterization of residual effects on valued components.¹¹

The Friends find this framing to be too narrow and the consideration of intergenerational effects, altogether deficient. Considerations of intergenerational and intragenerational equity are key sustainability principles and squarely within the purposes of the *Impact Assessment Act*. It is critical that the effect of the projects, at least 100 years into the future, be considered given the estimated operating lifespan of the Ring of Fire.

RECOMMENDATION NO. 4: Each of the Guidelines’ valued components should require consideration of intergenerational effects and accompanying risks imposed on future generations, in the event the roads be constructed, and future mining exploration and development occur in the Ring of Fire.

6. Cumulative Effects & Pre-Existing Human and Environmental Health Conditions

In describing baseline conditions, we support the draft Guidelines statement that the Impact Statement must provide a description of “existing environmental, health, social and economic components.”¹² However, in applying this methodology, we further recommend the projects’ assessment of cumulative effects take account of historical changes within the watershed that have been caused by prior human activity and industrial developments. Present-day ecological conditions should not be a marker to which impacts are measured.

RECOMMENDATION NO. 5: The Guidelines should not rely only on present-day ecological and watershed health conditions but ensure the projects’ cumulative effects

¹⁰ Draft Guidelines, s 19.1

¹¹ Draft Guidelines, s 21

¹² Draft Guidelines, s 7.1

assessment takes account of historical changes within the watershed that have been caused by prior human activity and industrial developments.

7. Boreal Caribou as a Valued Component

We support the draft Guidelines' framing that each species at risk, which includes boreal caribou, should individually be considered a valued component. It is critical that the Impact Statement's baseline conditions and cumulative effects assessment¹³ consider the Far North caribou ranges because of their migration into regions which will be impacted by the roads and the accompanying mining exploration they will trigger.

During our engagement sessions, community members expressed a high degree of concern about woodland caribou, noting that the exploration activities and accompany activities, such as draining of mushkeg and water taking, will impact the land and their habitat. Concerns also arose about disease incidence and how these projects, in tandem with the current health of the ranges, will be impacted.

RECOMMENDATION NO. 6: The Far North caribou range should be included within the Impact Assessment's mapping of baseline conditions and assessment of cumulative effects. As migratory animals, they will be impacted by the roads and the accompanying mining exploration triggered by the development.

8. Emergency Preparedness and Management

As the purpose of both the Webequie Supply Road and Marten Fall Community Access Roads is to provide access to mineral development in the Ring of Fire, the Friends submit it is critical to consider the emergency response capacity of communities living downstream of the proposed projects.

During our engagement sessions, participants made frequent reference to the severe flooding which occurred in 1985. We therefore ask that lessons learned from the Flood of 1985 be expressly considered and adopted into the Guidelines' consideration of emergency response.¹⁴ Impacts of dykes eroding during breakup and infrastructure, including culverts, failing, must all be accounted for in the review of emergency preparedness. The impact of climate change on increasing the frequency and severity of flooding and 'worst case scenarios' must also be taken into account.

¹³ Draft Guidelines, ss 7.4, 22

¹⁴ Draft Guidelines, ss 7.1, 23.1, 26

It is also critical that emergency preparedness measures not be decided upon without incorporating local knowledge from communities who have the experience with breakup, climate impacts and accidents. Therefore, the proponent should also be required to invite public feedback on emergency response and preparedness measures and ensure opportunities for ongoing public review and updates. These plans should be communicated to the public through a robust public awareness campaign. The efficacy of emergency preparedness is directly tied to the level of awareness and preparedness of local residents, prior to any accident or emergency situation.

RECOMMENDATION NO. 7: Lessons learned from the Flood of 1985 should be expressly considered and adopted in the Guidelines' consideration of emergency response.¹⁵ Impacts of dykes eroding during breakup and infrastructure, including culverts, failing, must all be accounted for in the review of emergency preparedness. The impact of climate change on the frequency and severity of flooding and 'worst case scenarios' must also be taken into account.

RECOMMENDATION NO. 8: The proponent should be required to invite public feedback on emergency response and preparedness measures and ensure opportunities for ongoing public review and updates. These plans should be communicated to the public through a robust public awareness campaign.

9. Community Health & Risk Assessment

The draft Guidelines provide that the proponent must conduct a preliminary model to determine whether a Human Health Risk Assessment is required.¹⁶ We strongly encourage that a Human Health Risk Assessment be made a requirement.

During our engagement sessions, we repeatedly heard about the need to study cumulative effects on human health which include both existing contaminated sites and future health impacts or exposures. There is also a lot of fear in the communities regarding the health impacts of the projects, given the already high incidence of cancers and skin conditions in the communities. Ensuring the projects are being measured in light of their impacts on community health is vital in building trust and ensuring an open and transparent decision-making process.

We also specifically request a study of mercury on human health and the environment, which takes into account the lifecycle of the project and legacy contamination. This would align with commitments made by Canada under the Minamata Convention to protect humans and the environment from anthropogenic emissions of mercury and mercury compounds.

¹⁵ Draft Guidelines, ss 7.1, 23.1, 26

¹⁶ Draft Guidelines, s 16.1

RECOMMENDATION NO. 9: We strongly encourage that a Human Health Risk Assessment be made a requirement of the IA. Ensuring the projects are assessed in light of their impacts on community health is vital in building trust and ensuring an open and transparent decision-making process.

RECOMMENDATION NO. 10: The Guidelines should be updated to require a study of mercury on human health and the environment, which takes into account the proposed project and legacy contamination.

(b) Draft Indigenous Consultation Plan

We appreciate having the opportunity to provide comments on the Agency’s draft Indigenous Consultation Plan (the “Plan”) as in the past, we have had few opportunities to do so.

From our Cree cultural perspective, we believe that all things - be it plant, animal, person, water, tree, air, rock or Mother Earth – deserve consideration not only in the present but for seven generations. We are here because of the foresight of those before us and we must be mindful of those who are yet unborn. We invite the Agency to do the same as this intergenerational thinking is not reflected in the Plan, as drafted.

While the draft Plan states that the “Agency encourages the early engagement of Chief and Council and other community leadership” within the impact assessment process, it assumes communities have a certain level of pre-existing knowledge about the projects, their scope and IA process. It also assumes that the leadership have the capacity – whether measured in time, financial resources or expertise - necessary to support involvement and undertake such a broad ‘ask’ by the Agency.

The draft Plan also identifies sub-populations, such as a women, elders and youth, as being involved in engagement. The Friends reiterate that it is of critical importance that the Agency ensure the involvement of youth. Among the community visits made by the Friends, were presentations to elementary schools. Students at Peetabek Academy were very keen to be engaged in the IA process and likewise teachers, had a high interest in using the Ring of Fire as a topic for discussion in their classroom and in research projects. We cannot underscore the vital importance of involving the youth, whose letters to the Agency we have appended to this letter (*see Appendix 3*). As one student remarked to the Friends, *‘no one explains it to us until its too late.’*

Because of these communities’ exposure to other mine projects, there is a familiarity about environmental contaminants and adverse impacts. As one grade 7 student told the Friends, *‘if the*

Ring of Fire happens, we won't have the same clean community as before.' As another echoed, 'why can't they [the mining proponent] go where it's already been destroyed?'

RECOMMENDATION NO. 11: The Agency should support the involvement of women, elders and youth, as identified in the Plan. There is a responsibility, shared with the Agency, to ensure the Plan enables and not just encourages participation.

An additional objective to add to the Plan is that development not occur without the community first having knowledge of it. Therefore, we recommend:

RECOMMENDATION NO. 12: Information sharing must reach beyond leadership and to community members and the public. This is critical in order to build public trust in the Agency, Canada and the proponent's intended developments.

We also have reservations about the sufficiency of the Plan given the Agency's insufficient notice about this phase of the IA process. While the Plan references "notice," details on how this will be undertaken are not provided. Therefore:

RECOMMENDATION NO. 13: We recommend that it be a requirement within the Plan that all notices be shared to local communities' Facebook pages, posted physically in groceries stores (ie. Northern Store), health centres and hospitals, local shops, and local news outlets (ie. CBC, Wawatay).

A further objective to add to the Plan is transparency in decision-making, to remedy the oft heard remark that *'we wrote to them, but never heard back.'* As another participant provided, *'we need to see what was allegedly said – it should not be a black box.'*

RECOMMENDATION NO. 14: It must be a requirement of Indigenous and public engagement that the Agency provide a disposition of comments received alongside a reason of how they factored into decision making.

Lastly, we recommend an objective be added that ensures cross-community dialogue. For many of the Friends' members, their communities have already been exposed to the federal EA process prior to the DeBeers diamond mine being brought online. As a lesson going forward, participants reflected that with the Ring of Fire and accompanying projects, they would *'like to have a good idea of where the community is at in their decision-making and what they're saying. We would like an opportunity to come together, along the coast.'*

RECOMMENDATION NO. 15: An objective be added to the Plan that ensures cross-community dialogue and information sharing.

III. CONCLUSION

We sincerely hope the Agency will include the feedback the Friends received from community members and incorporate our recommendations into the final Guidelines. As one elementary student remarked to us during our visit, *'how will we know if the environment has been heard?'*

We hope that our comments and our continued invitation to engage with the Agency provide a voice to communities who stand to be directly affected and those not yet born. We look forward to further engagement on this project and ask to be notified of any future steps in the impact assessment process.

Sincerely,

THE CANADIAN ENVIRONMENTAL LAW ASSOCIATION



Kerrie Blaise
Northern Services Legal Counsel

On behalf of
THE FRIENDS OF THE ATTAWPISKAT RIVER

APPENDIX 1 – LETTER FROM THE FRIENDS



Impact Assessment Agency of Canada
600-55 York Street
Toronto, ON M5J 1R7

November 12, 2019

Sent via email

Re: Invitation for Indigenous Engagement from the Friends of the Attawapiskat River

To whom it may concern:

The Canadian Environmental Law Association (CELA) has been retained to represent the Friends of the Attawapiskat River (the “Friends”) regarding the proposed impact assessments for the Marten Falls Access Road and Webequic Supply Road projects. CELA is a public interest legal clinic funded by Legal Aid Ontario which for nearly 50 years, has been providing legal services to low-income and vulnerable communities.

In furtherance of the *Impact Assessment Act’s* purpose of promoting communication and cooperation with Indigenous peoples of Canada, the Friends invite the Agency to visit their community in Attawapiskat. The Friends have been informed of similar visits occurring in other First Nation communities and encourage the Agency consult more broadly with other interested and potentially affected Indigenous groups and organizations.

The Friends of the Attawapiskat River (the “Friends”) is an unincorporated organization comprised of five community members from Attawapiskat and Peawanuck First Nations. As traditional knowledge holders with a direct interest in the outcome of the projects (ie. intergenerational health, cumulative and environmental affects), their participation and engagement in this IA is particularly relevant to the Agency. The Friends are particularly concerned about cumulative, downstream impacts of the proposed mines to be located near the Attawapiskat River, and request for your attendance to engage at a community meeting preferably between November 21 – 25, 2019.

Thank you for your prompt attention to this matter and we look forward to your response.

Sincerely,

Kerrie Blaise

Canadian Environmental Law Association

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APPENDIX 2 – SUMMARY OF RECOMMENDATIONS

RECOMMENDATION NO. 1: Expand the Guidelines' scope so that it applies to other reasonably foreseeable projects resulting from these road projects, including mining activities associated with the Black Thor, BlackBird, Big Daddy, and Black Label deposits, increased winter road traffic during operations by future mining proponents, and advanced mineral exploration. These projects should not only be considered during the proponent's cumulative effects assessment.

RECOMMENDATION NO. 2: The projects are located in global significantly peatlands (ie. mushkeg). As the draft Guidelines' framing of water flow, connectivity and water crossings does not adequately reflect the unique ecological and hydrological cycles of this region, it is necessary to update considerations required within the project description (s 3) and effects to valued components (s 15).

RECOMMENDATION NO. 3: Greater consideration of breakup and seasonal freeze/thaw patterns in light of climate change should be studied. Effects of climate change *with* valued components like the physical environment, the environment and human should be included in the Impact Statement.

RECOMMENDATION NO. 4: Each of the Guidelines' valued components should require consideration of intergenerational effects and accompanying risks imposed on future generations, in the event the roads be constructed, and future mining exploration and development occur in the Ring of Fire.

RECOMMENDATION NO. 5: The Guidelines should not rely only on present-day ecological and watershed health conditions but ensure the projects' cumulative effects assessment takes account of historical changes within the watershed that have been caused by prior human activity and industrial developments.

RECOMMENDATION NO. 6: The Far North caribou range should be included within the Impact Assessment's mapping of baseline conditions and assessment of cumulative effects. As migratory animals, they will be impacted by the roads and the accompanying mining exploration triggered by the development.

RECOMMENDATION NO. 7: Lessons learned from the Flood of 1985 should be expressly considered and adopted in the Guidelines' consideration of emergency response. Impacts of dykes eroding during breakup and infrastructure, including culverts, failing, must all be accounted for in the review of emergency preparedness. The impact of climate change on the frequency and severity of flooding and 'worst case scenarios' must also be taken into account.

RECOMMENDATION NO. 8: The proponent should be required to invite public feedback on emergency response and preparedness measures and ensure opportunities for ongoing public review and updates. These plans should be communicated to the public through a robust public awareness campaign.

RECOMMENDATION NO. 9: We strongly encourage that a Human Health Risk Assessment be made a requirement of the IA. Ensuring the projects are assessed in light of their impacts on community health is vital in building trust and ensuring an open and transparent decision-making process.

RECOMMENDATION NO. 10: The Guidelines should be updated to require a study of mercury on human health and the environment, which takes into account the proposed project and legacy contamination.

RECOMMENDATION NO. 11: The Agency should support the involvement of women, elders and youth, as identified in the Plan. There is a responsibility, shared with the Agency, to ensure the Plan enables and not just encourages participation.

RECOMMENDATION NO. 12: Information sharing must reach beyond leadership and to community members and the public. This is critical in order to build public trust in the Agency, Canada and the proponent's intended developments.

RECOMMENDATION NO. 13: We recommend that it be a requirement within the Plan that all notices be shared to local communities' Facebook pages, posted physically in groceries stores (ie. Northern Store), health centres and hospitals, local shops, and local news outlets (ie. CBC, Wawatay).

RECOMMENDATION NO. 14: It must be a requirement of Indigenous and public engagement that the Agency provide a disposition of comments received alongside a reason of how they factored into decision making.

RECOMMENDATION NO. 15: An objective be added to the Plan that ensures cross-community dialogue and information sharing.

Dear Canada,

We are the youth of mushkeg. Why do you want
to contaminate the water and land ^{and} water and land are connect
If you destroy the mushkeg, we are all hurt. It is our lungs, our air
and our oxygen. If our land gets affected, it would be on
you. We won't go hunting, the animals will be sick or die.

NO TO THE RING OF
FIRE.

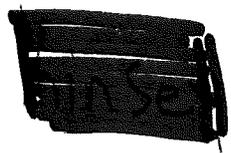
From: 

Age: 11 years

Fort Albany, On
First nation

Dear Canada, We are the youth of Mushkeg
Why do you want to contaminate the
Water and land. the lands of Water
connected.

if you destroy the mushkeg, we are all
hurt. it is our lungs, our air, and oxygen
if our land gets effected it would be
on you! No to the Ring of Fire.

 From: Fort albany first nation ontario.

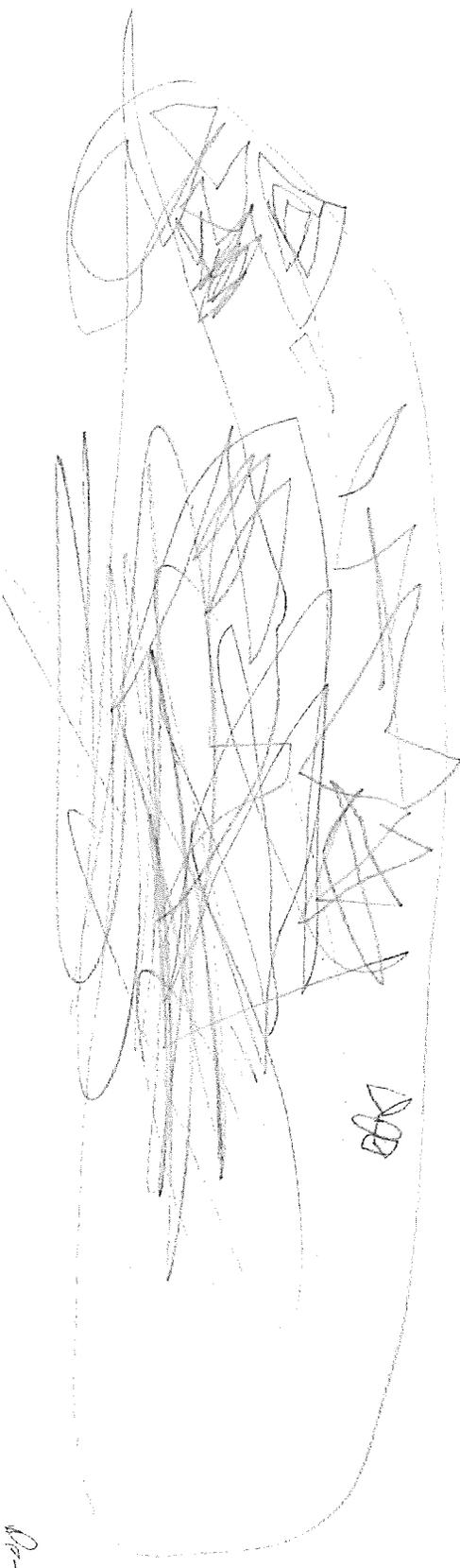
1/1/11

Don't worry, we are the sons of Musikeo. Why do you begin to communicate
The water and land, the land and waters are connected. If you destroy the water,
we are our own. It is our lungs, our air, and our oxygen. If our land gets affected, it
would be on you. **NO**

~~_____~~ as the hills of fire

NO

~~_____~~
Grade 6



As-Hon-b-e-l-a

Friday Jan 17 2020 Fort Albany

From [REDACTED] age 12

Dear Canada

We are the youth of mushKeg. Why do you want to cantaminate the water and land. The lands and water are connected.

If you destroy the mashKeg, we are all hurt. It is our lands, our air tangs. If our land gets affected it would be on you, W- to the Ring

No to the Ring of Fire

Dear candy

We are the youth of mushkeg. Why do you want to contaminate the water and land. The land and waters are connected. If you destroy the mushkeg we are all hurt.

It is our lungs, our air, our oxygen. If our land gets affected it would be on you. NO to the ring of fire.



Peetaback Academy

Fort Albany First nation

grade 6

Dear Canada,

, 11 years old, From
Peetabek Fort Albany.

We are the youth is already a mine there.

Of mushkeg. Why do

You want to contaminate

The water and land. The

land's + Water are connect,

If you destroy the mushkeg,

We are all hurt it's our

lungs. our air and our oxygen.

If our land gets affected it

would be on you No to the

RINGFIRE. We Never did

anything to you guys. There

Dear Carriada,

1300 persons will for the end of this sec
with all our efforts can get 11
the bonds are given, they are involved
people in business and business worth
people of business and business worth
the result of our efforts can be seen in the
business and if people can be
business will be on the

Stop it
or
You'll Regret
It

Jan 17, 2020

Dear Canada,

We are the youth of Mushkeg.

Why do you want to contaminate the
water and land?

If you destroy the Mushkeg, We are all
hurt, It is our lungs, our air, and OUR
Oxygen.

If our land gets affected, It would be
Your fault.

One last time, Stop It Or YOU"ll
Regret It!

No to the Ring of
Fire.

Sincerely,



Age: 11

Dear Canada,

Age 11

We are the youth of musktag.
Why do you want to contaminate
the water and land. the lands
and waters are connected.

If you destroy the musktag, we
are all hurt. It is our lungs, our air,
and our oxygen. If our land gets
affected it would be on you.
No to the Ring of fire