

Dear colleagues:

As indicated in the email of October 25, 2022, the Impact Assessment Agency of Canada (the Agency) received a [request for an extension](#) to the three-year time limit of the impact statement phase from Webequie First Nation.

This email is to inform you that on January 5, 2023, the Agency granted the request to extend the time limit, by three years and ten and a half months, to provide the required information and studies for the impact assessment of the Webequie Supply Road Project.

In coming to this decision, the Agency considered the information submitted by the Proponent and input from assessment participants (Attachment 1). The new deadline for Webequie First Nation to provide the required information and studies set out in the [notice of commencement of the impact assessment](#) is January 6, 2027.

The reasons for the Agency's decision are provided in its [letter](#) to the Proponent. A public notice pertaining to this decision has been posted to the Canadian Impact Assessment Registry Internet site for the Project: <https://iaac-aeic.gc.ca/050/evaluations/proj/80183>

Should you have any questions, please feel free to reach out to me.

Regards,

Ely Weisbrot
Project Manager

Webequie First Nation’s Extension Request - Table of Summarized Comments from Assessment Participants

IMPORTANT NOTES: The Tailored Impact Statement Guidelines (the Guidelines) for the Webequie Supply Road Project (the Project) outline the Agency’s expectations for the Proponent, regarding required information and studies for the assessment, and proponent conduct and deliverables of engagement with the Indigenous communities listed in the Indigenous Engagement and Partnership Plan and the public, particularly the public groups listed in the Public Participation Plan. Of note, sections 5 and 6 of the Guidelines describe the various topics the Proponent must cover during engagement activities. These include topics raised by the assessment participants during the Agency’s review of the extension request. Furthermore, the Guidelines require the Proponent to provide timely notification of proposed engagement activities on the topics. Therefore during the impact statement phase, which continues during the extension period, the Proponent is expected to conduct engagement activities that cover the topics identified in the Guidelines, including the issues raised by assessment participants.

The submitted comments from assessment participants are accessible from the Canadian Impact Assessment Registry Internet site (Reference #80183). This table was forwarded to Webequie First Nation. As the Proponent, Webequie First Nation is expected to demonstrate in the Impact Statement how all comments, received during the assessment process, including those received during the Agency’s extension request, were addressed.

Row #	Commenters	Summarized Comments	Agency Response
Extension Request			
1	Constance Lake First Nation Ginoogaming First Nation Temiskaming Native Women’s Support Group Wildlife Conservation Society Canada	Expressed support for the requested extension to the time limit of the impact statement phase.	The Agency acknowledges the comments.
2	Nibinamik First Nation	Concerned that baseline data could become inadequate over time.	According to section 1.1 of the Guidelines, the Proponent is to work collaboratively and seek support of the Agency and federal authorities throughout the assessment process, to ensure the guidance provided in the Guidelines is sufficient and methodology is appropriate.

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Consultation and Engagement			
3	Constance Lake First Nation Ginoogaming First Nation Jackfish Métis Association Temiskaming Native Women's Support Group Wildlife Conservation Society Canada	Expressed interest in participating in engagement activities for the project assessment (topics named by some commenters include selecting the preferred route alternative, setting the study areas, impacts on peatlands and carbon storage, and cumulative effects).	The Agency expects the Proponent to engage with assessment participants on the various assessment topics and address the participants' comments, to comply with sections 5 and 6 of the Guidelines. This includes providing timely notification of opportunities for assessment participants to share their views and provide community and Indigenous knowledge.
4	Constance Lake First Nation Ginoogaming First Nation Temiskaming Native Women's Support Group Wildlife Conservation Society Canada	Commented that Indigenous communities do not have the financial and technological resources and the capacity needed to participate meaningfully in the assessment process. Commented that there are multiple demands on communities, which makes it challenging to participate and provide input.	The Agency acknowledges the challenges with respect to resources and capacity to participate, and access to funding. Section 6 of the Guidelines requires the Proponent to provide plain language documents to the Indigenous communities listed in the Indigenous Engagement and Partnership Plan. Upon request, the Proponent is expected to provide simultaneous translation for engagement sessions and plain language documents translated in Indigenous languages, to enable meaningful engagement with Indigenous communities. According to section 6 of the Guidelines, the Proponent is expected to work with the Indigenous communities to determine the best approach to engagement that ensures a safe space for meaningful dialogue to foster full and free participation. The Proponent must give consideration to culturally appropriate, gender sensitive and trauma-informed and healing centered engagement methods and approaches. The Agency encourages Indigenous communities listed in the Indigenous Engagement and Partnership Plan, to apply for Agency funding to support, partially, their activities for the federal

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			impact assessment, if they have not already done so. To apply, please send an email to webequie@iaac-aeic.gc.ca.
5	Temiskaming Native Women's Support Group Wildlife Conservation Society Canada	Shared recommendations to enhance future engagement outcomes.	The Guidelines provide the set of instructions that the Proponent must follow, along with the Proponent's actions to support activities in the Indigenous Engagement and Partnership Plan and the Public Participation Plan, for the federal impact assessment. The submission with the recommendations is posted on the Canadian Impact Assessment Registry Internet site (Reference #80183) and the Proponent is expected to consider and respond to the recommendations. How comments were addressed should be incorporated in the Impact Statement, as per sections 5.1 and 6.2 of the Guidelines.
6	Temiskaming Native Women's Support Group	Stressed the importance for the Proponent to include the perspectives of Indigenous women, girls, and gender diverse people during their engagement for the Project.	Sections 9, 10, 11, 12.3 of the Guidelines require the Proponent to collect health, social and economic baseline data that is disaggregated to support the analysis of disproportionate potential effects of the Project, as per Gender Based Analysis Plus (GBA Plus). In addition, sections 16, 17 and 19.1, require the Proponent to utilize GBA Plus when assessing the potential effects on Indigenous peoples.
7	Constance Lake First Nation Ginoogaming First Nation Wildlife Conservation Society Canada	Commented that the Proponent should make more effort to engage in-person, be considerate when notifying and timing engagement, and provide material that supports community-level conversations.	As per section 6 of the Guidelines, the Proponent is expected to work with the Indigenous communities identified in the Indigenous Engagement and Partnership Plan for the Project, to understand the approaches to engagement that would create safe spaces for meaningful dialogue to enable full and free participation of all community members, including different subpopulations (e.g., Elders, women and youth), in the engagement process.

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Alternative Routes Assessment			
8	Wildlife Conservation Society Canada	Commented that the selection of the preferred route, should consider values such as the extent each alternative would impact peatlands, carbon storage and carbon sink capacity, and important wildlife habitats.	Section 4.4 of the Guidelines requires the alternative means assessment, including assessing route alternatives, to consider potential environmental, health, social and economic effects of alternative means of carrying out the Project that are technically and economically feasible. In addition, the alternative means assessment should be informed by comments received from assessment participants.
Effects Assessment Methodology			
9	Constance Lake First Nation Nibinamik First Nation Temiskaming Native Women's Support Group	Commented on the importance of using relevant information for the assessment, including right-sized spatial boundaries, sufficient baseline data and input from Indigenous communities.	<p>The Proponent is expected to demonstrate in the Impact Statement that recent guidance and best practices were followed in meeting the requirements of the Guidelines. For example, section 1.1 encourages the Proponent to work collaboratively and seek support of the Agency and federal authorities, to ensure the guidance provided in the Guidelines is sufficient and methodology is appropriate.</p> <p>Sections 7.1 and 7.4 of the Guidelines require the Proponent to establish appropriate study area boundaries that encompass the spatial boundaries of the Project.</p> <p>Section 7.2 also identifies for the Proponent that a source of baseline information is Indigenous knowledge, including oral histories and knowledge gathered by spending time on the land with knowledge holders.</p> <p>Section 21 indicates that best practices should be applied in the effects assessment to predict the residual effects.</p>
10	Wildlife Conservation Society Canada	Shared specific recommendations to enhance data collection and biophysical field surveys (i.e. air quality, birds, eskers, fish, groundwater, peatlands, surface water and wildlife surveys) with less intrusion.	The Guidelines provide the set of instructions that the Proponent must follow for the federal impact assessment. The submission with the recommendations is posted on the Canadian Impact Assessment Registry Internet site (Reference #80183) and the Proponent is expected to consider and respond to the recommendations.

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			How comments were addressed should be incorporated in the Impact Statement, as per sections 5.1 and 6.2 of the Guidelines.
Cumulative Effects			
11	Constance Lake First Nation Ginoogaming First Nation Nibinamik First Nation	Expressed concern that the cumulative effects assessment will not include effects from mineral development projects.	Section 22 of the Guidelines outlines the requirements for the cumulative effects assessment. Among the minimum projects and activities to include in the cumulative effects assessment is mineral development. Also, the cumulative effects assessment would consider cumulative effects on the exercise of Aboriginal and Treaty rights, and would consider the results of any relevant regional study conducted.
Groundwater and Surface Water			
12	Wildlife Conservation Society Canada	Supported testing for chromium (VI), total mercury, and methyl mercury, in groundwater samples.	The support is acknowledged. As per sections 8.6 and 14.2 of the Guidelines, the Proponent is required to collect baseline data and information on surface water, and assess potential effects on groundwater and surface water quality and quantity.
13	Constance Lake First Nation Wildlife Conservation Society Canada	Concerned about the methodologies for assessing effects and cumulative effects on waters, including considerations for spatial boundaries, and the influences of hydrological and hydrogeological interconnections of watersheds, peatlands and fens.	Sections 8.6, 8.8 and 15.1 of the Guidelines require the Proponent to assess baseline conditions and potential effects to fish and fish habitat. This includes changes to the quality and quantity of waterbodies and watercourses. As per sections 8.6 and 14.2 of the Guidelines, the Proponent is required to collect baseline data and information on surface water, and assess potential effects on groundwater and surface water quality and quantity, which includes changes to water flows. In addition, sections 8.5, 12.2, 14.3, 17.2 and 17.3 require the Proponent to gather information to assess effects on riparian and wetland environments of the river systems, as well as effects on land and resource uses and navigation.

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Geology, Soils and Terrain			
14	Wildlife Conservation Society Canada	<p>Commented that eskers should be a valued component as they are an ecologically and culturally important landform (for wildlife such as wolverine, wolf, caribou and upland bird; habitat and movement corridors; and community travel routes, village sites and burial sites).</p>	<p>Sections 8.3, 8.4 and 14.3 of the Guidelines require the Proponent to assess baseline conditions and potential effects of the Webequie Supply Road Project (the Project) on eskers.</p> <p>Sections, 8.9, 8.11, 15.2, 15.3 and 15.4 require the Proponent to assess how potential changes to eskers would impact wildlife and wildlife habitat.</p> <p>In addition, sections 12.1 and 17.6 of the Guidelines, require the Proponent to gather information about Indigenous culture and assess changes to the structures, sites or things of historical, archaeological, paleontological or architectural significance and associated effects on other social and economic conditions (including burial sites), as well as anticipated effects to traditional cultural activities, and plants and wildlife of cultural importance.</p>
Riparian and Wetland Environments (Including Carbon Sinks)			
15	<p>Ginoogaming First Nation</p> <p>Wildlife Conservation Society Canada</p>	<p>Concerned about project impacts on the carbon storage capacity of the peatlands.</p> <p>Commented that engagement on impacts on the peatlands and how those impacts are considered in the effects assessment, including alternatives assessment and assessing cumulative effects, is required.</p>	<p>Sections 8.5, 8.6, 8.7 and 14.3 of the Guidelines require the Proponent to assess baseline conditions and potential effects of the Project on wetlands. Sections 8.9, 8.11, 15.3 and 15.5 of the Guidelines require the Proponent to assess how changes to wetlands could impact terrestrial and aquatic wildlife, and their habitat.</p> <p>In addition, sections 8.5 and 14.3 of the Guidelines require the Proponent to assess baseline conditions and potential effects of the Project on peatlands. Sections 8.11, 15.2 and 15.3 of the Guidelines require the Proponent to assess how changes to peatlands could impact terrestrial wildlife and their habitat. Explanations of proposed mitigation measures specifically for peatlands are required, according to section 20 of the Guidelines.</p> <p>With respect to peatlands and climate change, section 15.5 of the Guidelines requires a description of the Project's effects on carbon sinks. In addition, the Proponent is expected to comply with the guidance included in the Strategic Assessment of Climate Change and the associated technical guide, regarding the</p>

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			estimation of greenhouse gas emissions and effects on carbon sinks.
Aquatic and Terrestrial Wildlife			
16	Temiskaming Native Women's Support Group Wildlife Conservation Society Canada	Concerned about potential effects on terrestrial wildlife (e.g. upland birds, caribou, wolverine, wolves) and their habitats (such as nesting and denning areas, movement corridors). Commented that appropriate methodologies and mitigation are needed to address effects to fish communities, terrestrial wildlife and their habitats.	Sections 8.8, 8.9, 8.10 and 8.11 of the Guidelines require the Proponent to collect information on baseline conditions for fish habitat, migratory bird habitat, terrestrial wildlife habitat, and species at risk habitat, respectively. In addition, sections 15.1, 15.2, 15.3 and 15.4 of the Guidelines require the Proponent to assess the potential effects of the Project on the habitats of fish, migratory birds, terrestrial wildlife and species at risk, respectively. Section 20 of the Guidelines requires the Proponent to work with federal authorities, Indigenous communities and the public, to develop prevention and mitigation measures that minimize the Project's effects on areas identified as significant habitat.
Human Health			
17	Wildlife Conservation Society Canada	Concerned about potential impacts to human health arising from project activities (e.g. mining aggregate) that would release and mobilize naturally occurring metals into the water systems.	Sections 8.6 and 14.2 of the Guidelines require the Proponent to assess baseline conditions and potential effects of the Project on groundwater and surface water. In addition, sections 9 and 16.1 of the Guidelines require the Proponent to assess baseline conditions, potential effects to drinking water, and the health risk from exposure to contaminants of potential concern via consumption.
Physical and Cultural Heritage			
18	Nibinamik First Nation Wildlife Conservation Society Canada	Concerned about impacts to sites of cultural importance for Indigenous communities.	Sections 12.1, 12.2, 12.4 and 19.1 of the Guidelines require the Proponent to assess baseline conditions and potential effects to sites of cultural importance, for Indigenous communities.
Social Conditions			
19	Wildlife Conservation Society Canada	Concerned about potential impacts to sites of social importance for Indigenous communities.	Sections 10, 17.2 and 17.6 of the Guidelines require the Proponent to assess baseline conditions and potential effects to sites of social importance, for Indigenous communities.

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20	Temiskaming Native Women's Support Group	Concerned about the potential risk to public safety that may arise, particularly with future development and increased road use.	<p>Sections 10 and 17.5 of the Guidelines require the Proponent to assess baseline conditions and potential effects of the Project on community well-being and public safety. In addition, section 13.1 of the Guidelines indicates that the effects assessment must be done for all phases of the Project (construction, operation, maintenance, suspension, decommissioning and abandonment).</p> <p>Section 22 of the Guidelines outlines the requirements for the cumulative effects assessment. Among the minimum projects and activities to include in the cumulative effects assessment is mineral development. Also, the cumulative effects assessment would consider cumulative effects on the exercise of Aboriginal and Treaty rights, and would consider the results of any relevant regional study conducted.</p>