

Comments from the Federal Review Team on Marten Falls Community Access Road Project Economic Study Plan – October 25, 2021

It is essential that the Impact Statement for the Marten Falls Community Access Road Project (the Project) address all requirements outlined in the Tailored Impact Statement Guidelines (the Guidelines), and that the study plans outline a clear approach to achieving these requirements. The Impact Assessment Agency of Canada (the Agency) has highlighted sections of the Guidelines where requirements for the Impact Statement may not be met, based on content of the draft study plan submitted to the Agency. Note that this table does not provide an exhaustive list of the requirements described in the Guidelines. The Guidelines should be reviewed in their entirety, including the sections identified below.

General Comments from the Impact Assessment Agency of Canada on the Marten Falls Community Access Road Draft Study Plans – July 2, 2020					
#	Tailored Impact Statement Guidelines Section¹	Required Action for Proponent	Proponent Response	Final Study Plan Section Reference	Agency comments
GC-01	Section 5 - Public Participation and views (including 5.1, 5.2)	<p>Provide a clear description in the study plans of how public engagement opportunities have been and/or will be integrated into the impact statement phase. This must include detail on how the public will have opportunities to provide input to contribute to the development of the Impact Statement, as required in Section 5 of the Guidelines.</p> <p>Describe what engagement with the members of the public listed in the Public Participation Plan has been done in the development of the study plans, and/or any planned engagement with members of the public on the proposed study plans.</p>	<p>Section 4: describes how the Proponent will provide Project notices and opportunities with members of the public listed in the Public Partnership Plan. This will also include the opportunity to provide input on the existing environment, VCs, effects assessment methods, effects assessment results, and mitigation and follow-up program measures as applicable. A variety of activities will be offered so that members of the public are informed of the IS / EA Report as it progresses and are aware of the opportunities and means to provide their input. The study plans have recognized public and agency input received on the Project to date.</p>	Section 4.1 “A variety of activities will be offered so that members of the public are informed of the IS / EA Report as it progresses and are aware of the opportunities and means to provide their input.”	<p>Section 4.1 of the study plan mentions that “a variety of activities will be offered”, however, no details on the likely engagement activities are provided.</p> <p>As required by Section 5 of the Guidelines, the Impact Statement must provide a record of engagement that describes all efforts taken to seek the views of local communities and other stakeholders with respect to the Project, including on the study plans. This record of engagement is to include all engagement activities undertaken prior to the submission of the Impact Statement, including prior to and during the planning phase, and in the preparation of the Impact Statement.</p> <p>Provide details on the timeline for public engagement relative to the project workplan, including engagement relative to the schedule for baseline work, and in consideration of the project team’s timeline for the development of the Impact Statement.</p> <p>Demonstrate in the Impact Statement how comments provided by members of the public on the economic conditions were taken into consideration. Comments provided to the Agency are available on the Canadian Impact Assessment Registry Internet site at: https://iaac-aeic.gc.ca/050/evaluations/proj/80184/contributions</p>
GC-02	Section 6 - Description of Engagement with Indigenous Groups (including 6.1, 6.2, 6.3)	<p>Provide a clear description in the study plans of how all Indigenous groups listed in the Indigenous Engagement and Partnership Plan will have opportunities to provide Indigenous knowledge, including the validation of how information they provided was applied. The study plan should include a description of the proposed methods for data collection, management of confidentiality, and information storage. This should also include a methodology for tracking information that has been approved by the group, to demonstrate that the guidance outlined in Section 6.2 of the Guidelines has been incorporated into the study plans.</p>	<p>In Section 4.2 it is noted that the Proponent will provide Project notices and opportunities for consultation and engagement with Indigenous communities identified in the Indigenous Partnership and Engagement Plan. A variety of activities will be offered so that Indigenous communities are informed of the IS / EA Report as it progresses and are aware of the opportunities, means and timelines to provide their input.</p> <p>Section 2.1.1 outlines the approach to handling confidential information, by means of permission from Indigenous communities to include Indigenous Knowledge in the IS / EA Report, regardless of the source of the Indigenous Knowledge.</p>	<p>Sections 4.2 “...A variety of activities will be offered so that Indigenous communities are informed of the IS / EA Report as it progresses and are aware of the opportunities, means and timelines to provide their input...”</p> <p>“...Indigenous communities will have the opportunity to comment on components of the study plans throughout the IS / EA Report consultation and engagement process...”</p>	<p>Section 4.2 of the study plan states that “a variety of activities will be offered”, however, no details on the planned engagement activities are provided.</p> <p>Section 4.2 of the study plan also states that “Indigenous communities will have the opportunity to comment on components of the study plans throughout the IS / EA Report consultation and engagement process”, however, it is unclear on which components of the study plan the project team plans to engage. It is also unclear whether Indigenous groups will be provided with a meaningful opportunity to provide input on a preliminary approach/method for baseline data collection, as required in Section 6 of the Guidelines, or if engagement will take place after the baseline data collection is complete.</p>

¹ Refer to complete sections of the Guidelines for more context.

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		Describe what engagement with all the Indigenous groups listed in the Indigenous Engagement and Partnership Plan has been done in the development of the study plans, and/or any planned engagement with Indigenous groups on the proposed study plans, particularly in relation to collection of Indigenous knowledge (i.e. develop the work plan in collaboration with those Indigenous groups that would need to provide knowledge).	The study plans have recognized Indigenous community input received on the Project to date.		Provide details on the timeline for Indigenous engagement on the economic study plan, including engagement relative to the schedule for baseline work, and spatial and temporal boundaries determinations, and particularly in relation to collection of Indigenous knowledge, and in consideration of the project team's timeline for the development of the Impact Statement. Demonstrate in the Impact Statement that comments provided by Indigenous groups on the economic conditions were taken into consideration. Comments provided to the Agency are available on the Canadian Impact Assessment Registry Internet site at: https://iaac-aeic.gc.ca/050/evaluations/proj/80184/contributions
GC-03	Section 6.2 - Analysis and response to questions, comments, and issues raised	Revise the study plans to include an approach to handling confidential information that demonstrates adherence to the guidance provided in Section 6.2 of the Guidelines.	Section 2.1.1: Section has been updated to include information regarding both confidentiality and permission information on all collected Indigenous Knowledge, regardless of the source. This section also includes how information regarding the Indigenous Knowledge Sharing Agreements will be established by the Proponent and Indigenous community participating in the Program.	Section 2.1.1 “...Sensitive and / or confidential information collected through Indigenous Knowledge Sharing Agreements will be protected from public or third-party disclosure and will be established between the Proponent and Indigenous communities participating in the Indigenous Knowledge Program prior to the sharing and use of any sensitive information. Instances where Indigenous Knowledge sharing has taken place during consultation activities (e.g., meetings) will be recorded in the Record of Consultation and Engagement, including where Indigenous Knowledge was incorporated into Project decisions and into the IS / EA Report (i.e., specifics will not be included in the Record of Consultation and Engagement given the potential sensitivity and / or confidentiality of the information shared)...”	As required in Section 6 of the Guidelines describe the confidential information provided by each Indigenous group. Present the content in sufficient detail to support understanding of the potential effects and impacts on rights, while also protecting confidential/sensitive specifics and respecting stipulations in the confidentiality agreements (e.g. use buffer areas instead of specific locations, etc.). Provide to the Agency, in the form of a letter from the Indigenous group that shared confidential information, a letter confirming that: <ul style="list-style-type: none"> the Indigenous group that provided confidential information is satisfied with the way the Impact Statement was informed; the Indigenous group that provided confidential information is satisfied with the way the issue was solved or addressed.
GC-04	Study plans spatial boundaries	Describe the approach to be implemented to demonstrate how the definitions of the proposed study area boundaries: <ul style="list-style-type: none"> encompass the anticipated boundaries of the Project's effects, including all potentially impacted local communities, municipalities and all Indigenous groups listed in the Indigenous Engagement and Partnership Plan; and take into account community knowledge and Indigenous knowledge; current or traditional land and resource use by Indigenous groups; exercise of Aboriginal and Treaty rights of Indigenous peoples, including cultural and spiritual practices; physical, ecological, 	Section 6.2: General information on study areas for the Project, including a detailed list of what was considered to develop the discipline-specific local and region study areas, is included in each study plan. Each study area has been proposed taking into consideration community knowledge and Indigenous Knowledge, current or traditional land and resource use by Indigenous communities, and the exercise of Aboriginal and Treaty Rights of Indigenous peoples, including cultural and spiritual practices, physical, ecological, technical, social, health, economic and cultural considerations available at this time. The proposed discipline-specific study areas are preliminary. The proposed study areas will be	Section 6.2.1 “The preliminary LSA currently being considered within the scope of the ongoing provincial regulatory review process generally includes the area within 2.5 km of the centreline of Alternative 1 and Alternative 4.”	Section 7 of the Guidelines, states that “The size, nature and location of past, present and foreseeable future projects and activities are factors that should be included in the definition of spatial boundaries.” It is unclear how a Local Study Area of 2.5 km from the centreline of the Project would be appropriate to assess direct effects on economic conditions. At a minimum, the upgrades to the Anaconda and Painter Lake forestry access roads, the Northern Road Link Road Project, the Webequie Supply Road Project, as well as winter roads, activities and communities connected through these roads should be included in the Local Study Area.

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		technical, social, health, economic and cultural considerations; and the size, nature and location of past, present and foreseeable future projects and activities.	consulted and engaged on early in the IA / EA process. In addition, the Indigenous Knowledge Program provides additional opportunities for community knowledge and Indigenous Knowledge, current or traditional land and resource use by Indigenous communities, and the exercise of Aboriginal and Treaty Rights of Indigenous peoples to be shared in greater detail.		<p>Update the study plan to demonstrate that factors outlined in Section 7 of the Guidelines were taken into account in defining preliminary spatial boundaries for the Project.</p> <p>As required in Section 7.4.1 of the Guidelines, provide information regarding how the following were/will be taken into account in defining the spatial boundaries: community knowledge and Indigenous knowledge; current and traditional land and resource use by Indigenous groups; exercise of Aboriginal and Treaty rights, including cultural and spiritual practices; physical, ecological, technical, social, health, economic and cultural considerations; and the size, nature and location of past, present and reasonably foreseeable future projects and activities.</p> <p>Ensure that the economic conditions Regional Study Area encompasses the spatial boundary of cumulative effects.</p> <p>Provide the above information in a way that allows those who provided the knowledge to the proponent and the Agency to see their input reflected in the Impact Statement. It is not sufficient to state that “input from participants will be/was taken into account”.</p>
GC-05	Section 7 - Baseline Methodologies (Including 7.1, 7.2, 7.3, 7.4)	<p>Provide clear descriptions in the study plans of the proposed study areas and the criteria used to define the study areas for each valued component.</p> <p>Provide clear descriptions of the timing of previously collected data (days/month/year) and future approximate (month/year or season/year) for every field work planned and the criteria used to tailor the temporal boundaries to the valued components under consideration.</p> <p>Describe how all Indigenous groups listed in the Indigenous Engagement and Partnership Plan will be, or have been, engaged to provide input on spatial and temporal boundaries.</p> <p>Explain how the Agency will be provided opportunities to validate spatial and temporal boundaries.</p>	<p>Local Study Area (LSA) and Regional Study Area (RSA) for each valued component are described in Table 6-1, including rationale used to define the area.</p> <p>Study plans have been designed considering historical information, where applicable and available. Study plans will be updated with appended Work Plans, to be submitted at a future date, which will detail upcoming planned field activities.</p> <p>As detailed in both Section 4.2 and Section 6.2 the Proponent will continue to provide opportunities for neighbouring Indigenous communities and interested persons to provide input and inform the effects assessment, including the LSAs and RSAs.</p> <p>Government agencies and interested persons will have the opportunity to comment on component of the study plans throughout the IS / EA Report consultation and engagement process</p>	<p>Sections 4.3, 4.4, 7.2.2 and 7.3</p> <p>Section 4.3 “...The economic data collection program will include primary data collection activities that may involve for example, targeted interviews, focus groups, questionnaires and other niche tools to gather information from diverse populations to resolve gaps in economic secondary data...”</p> <p>Section 4.4 “...For the Indigenous communities that express specific economic concerns, targeted economic data collection will be implemented through the economic data collection program, consistent with the likelihood of effect anticipated to the community as defined by the MFFN CAR Project Team...”</p> <p>Section 7.2.2 “...Focused data collection on gaps identified in the secondary sources related to VCs and indicators such as quality factors for services and infrastructure...”</p> <p>Section 7.3</p>	<p>To ensure that baseline data collection will meet the requirements of the Guidelines, the Agency advises the project team to share a workplan describing how the survey for economic data collection will be conducted. If it is not possible to provide this information in the study plans or workplans, the Agency requires an opportunity to review the collected baseline data/baseline reports prior to the preparation of the Impact Statement documentation.</p> <p>Include in the Impact Statement a baseline community profile for each Indigenous group listed in the Indigenous Engagement and Partnership Plan and for each local community listed in the Public Participation Plan, to meet the requirements of Section 11 of the Guidelines. The baseline community profiles should be used to inform the effects assessment required by Section 18 of the Guidelines.</p> <p>It is unclear whether any secondary baseline studies have been conducted to identify potential gaps in the baseline information requirements described in Section 11 of the Guidelines. Primary data collection should be used where secondary sources are unable to provide the required information.</p> <p>Update the study plan to provide the current status of the secondary baseline data collection analysis and specify</p>

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				"...The primary economic data collection is anticipated to be conducted during the Spring and Summer of 2021, however this timing is subject to change and dependent on the larger Project schedule, including engagement and consultation activities..."	where gaps need to be addressed to meet the requirements in Section 11 of the Guidelines.
GC-06		Provide further details in the study plans on how GBA+ has been integrated into all aspects of data collection methodology, as per Section 7.1 of the Guidelines, and into the assessment of effects and impacts, as mentioned in Sections 13, 20, 21, and others, related to effects assessments of the Guidelines.	Section 4.3 has been updated to include the consideration of Identity and Gender-Based Analysis Plus (GBA+) including both Indigenous communities and their relevant subpopulations and non-Indigenous communities and their subpopulations. During consultation and engagement activities these groups (and any others defined during consultation) will be engaged with on targeted input.	Sections 4.3 and 9.8	<p>A GBA+ framework should be applied to analyze historic and current power relations, decision-making processes, and how gender intersects with health, social, and economic conditions.</p> <p>Include equity considerations as a tool to ensure inclusiveness in the engagement process.</p> <p>Describe how GBA+ has been and will be applied to the consideration of engagement activities. Identify specific methods targeted to specific subgroups.</p> <p>Provide detail on how GBA+ has been integrated into all aspects of data collection methodology, including for the definition of indicators, as per Section 7.1 of the Guidelines, and into the assessment of effects and impacts, as mentioned in Sections 13, 20, 21, and others, related to effects assessments of the Guidelines.</p> <p>It is not sufficient to mention that Gender-Based Analysis Plus will be applied to the assessment. Clear descriptions of how GBA+ was integrated (including to which variables, method, and how it influenced results' interpretation) are needed in the Impact Statement.</p>
GC-07	Section 13 - Effects Assessment (including 13.1, 13.2)	<p>Provide details to demonstrate how the Project's potential effects will be considered, as per the requirements in Sections 13 to 19 of the Guidelines. Ensure that the effects assessment considers the effects of each of the project components and physical activities, in all phases, and that it is based on a comparison to the proposed baseline work.</p> <p>Provide detail on how engagement with all Indigenous groups listed in the Indigenous Engagement and Partnership Plan and the public will inform the effects assessment and the selection of mitigation measures and follow-up program measures.</p>	<p>Project environmental interaction are separated into Project phases, and Project activities for each environmental discipline in their VC-specific study plan listed as Table 9-1.</p> <p>Information collected through the various activities (e.g., field studies and programs, effects assessments) of each discipline area (e.g., wildlife, vegetation, cultural heritage) will be shared with the Indigenous Knowledge Program leads. This will support the establishment of the existing environment and the effects assessment for the Aboriginal and Treaty Rights and Interests environmental discipline, as well as the identification of potential mitigation measures and monitoring programs.</p>	Throughout the study plan, Sections 6.2 and 9	<p>As required in Sections 7 and 13 of the Guidelines, ensure that the effects assessment considers the effects of each of the project components (including but not limited to all alternative routes brought forward in the Impact Statement, all aggregates sources, access roads, etc.) and physical activities, in all phases, and that the assessment is based on a comparison to the data and information gathered during the proposed baseline work.</p> <p>Clarify the level of information that will be shared with, and explained to, the Indigenous Knowledge Program leads and whether study plans will be made available to all Indigenous groups listed in the Indigenous Engagement and Partnership Plan.</p>
GC-08	Section 13.1	Provide clear descriptions of the rationale behind the assumptions, including but not limited to the assumed average daily traffic and vehicles composition during the construction and	Section 10: Current assumptions to be used in the effects assessment have been identified. Any additional assumptions will be identified and rationale will be provided in the IS / EA Report.	Section 10	Before conducting the effects assessment analysis, the Agency advises the proponent to seek the Federal Review Team's confirmation of the assumptions that will be used in the analysis or, at a minimum, to discuss the type of assumptions that will be considered.

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		operation phases that will be considered for the effects assessment and the cumulative effects assessment.			As required by Section 13.1 of the Guidelines, ensure that the Impact Statement clearly outlines the assumptions used for the assessment of effects, including cumulative effects, on each valued component.
GC-09	Section 19.2 - Impacts on the Exercise of Aboriginal and Treaty Rights	Describe an approach for identifying the potentially impacted rights of Indigenous peoples of Canada that are recognized and affirmed by section 35 of the <i>Constitution Act, 1982</i> , and for integrating the potential impacts on those rights into the collection of baseline information and the effects assessment.	All study plans reference how potential effects on Indigenous rights will be assessed in the Aboriginal and Treaty Rights and Interests Study Plan. Impacts on Rights considerations are explained in the rationale for defining a Local Study Area and Regional Study Area for Aboriginal and Treaty Rights and Interests VCs. Further information for this is listed in Section 6.2.2 in the Aboriginal and Treaty Rights and Interests Study Plan.	Section 5, and Section 6.2.2 in the Aboriginal and Treaty Rights and Interests Study Plan	Feedback will be provided in the Federal Review Team's comments package on the Aboriginal and Treaty Rights and Interests Study Plan.
GC-11	Section 25 – Description of the Project's contribution to sustainability	Provide detail on the approach to meeting the requirements of Section 25 of the Guidelines regarding the description of the Project's contribution to sustainability.	Section 9: the sustainability assessment for the Project will be undertaken on the preferred alternative and will characterize the Project's contribution to sustainability incorporating the requirements set out in Section 25 of the Guidelines.	Section 9.7	Section 9.7 of the study plan is listing the requirements outlined in Section 25 of the Guidelines. Ensure that the Impact Statement provides a description of the method or approach followed to meet the requirements of Section 25 of the Guidelines.

Response to Preliminary Comments from the Impact Assessment Agency of Canada on the Marten Falls Community Access Road Draft Economic Study Plan submitted on May 22, 2020:						
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EC-01	Section 4.1	Section 6	Required Action # 1: Update the study plan to include the list of all Indigenous groups that will be engaged, at a minimum the Indigenous groups listed in the IEPP, as part of the baseline data collection, defining the list of criteria and indicators, and effects assessment analysis. The list should be consistent throughout the study plan	Table 4-1 in the updated Study Plan provides a list of Indigenous communities that will be engaged and consulted with on the Project, which is inclusive of all the groups listed in the IEPP provided by the Agency.	Table 4-1, Section 4.3, Section 7.2	<p>Required Action # 1 was partially addressed.</p> <p>Section 7.2 of the study plan states that “Indigenous communities identified in Table 4-1 <u>may</u> be engaged for the purposes of economic data collection”.</p> <p>Provide a workplan that clearly outlines the approach to engage Indigenous groups listed in the Indigenous Engagement and Partnership Plan in determining the spatial and temporal boundaries specifically for the economic conditions valued component.</p> <p>The Impact Statement should clearly outline all perspectives and input received on spatial and temporal boundaries, including Indigenous and community knowledge, and demonstrate how these were integrated into or contributed to decisions regarding the Project (e.g., project design). If the Proponent determined that some perspectives and input received during engagement activities did not warrant consideration or integration into the decisions regarding the Project, a detailed description of the input and rationale for exclusion must be provided in the Impact Statement.</p> <p>In addition, Section 7.2 of the study plan states that “The economic primary data collection program will select key socio-economic knowledge holders to participate in the program.” Clarify how key socio-economic knowledge holders were selected.</p>
EC-02	Section 3	Section 6.2	Required Action # 2: Provide further details on how input received from Indigenous groups will be tracked, considered, and reported to the Agency in the Impact Statement, as per the expectations of Section 6 of the Guidelines.	Indigenous communities will be engaged with as part of the overall consultation and engagement program for the Project, which is summarized in Section 4 of the updated Study Plan. All information and comments received from Indigenous communities will be logged, tracked and responses generated where applicable. Section 5 of the Study Plan describes the Indigenous Knowledge Program, another avenue for Indigenous communities to provide input on the Project. Section 2.1 has additional information on the Project's approach to handling confidential information	Sections 2.1, 4 and 5	Required Action # 2 was partially addressed. See comment GC-03.
EC-03	Sections 4 and 4.3	Sections 5.2 and 6.3	Required Action # 3: Describe in the study plan how the proponent will engage diverse populations to collect information necessary to support the GBA+ and how that information will be tracked, considered and reported in the Impact Statement.	The Economic Study Plan will integrate a GBA+ framework into the Economic data collection and assessment program.	Section 4.3	Required Action # 3 was partially addressed. See comment GC-06.
EC-04	Section 4.1	Section 5	Required Action # 4: Update the study plan to include the list of the members of the public and public groups that will be engaged, at a minimum the public participants listed in the	Considering the Economic VCs as presented in Table 9.2, and the study areas presented in Section 6.2, the Municipality of Greenstone is the primary public body	Section 6, Table 6-1	Required Action # 4 was partially addressed. See comments GC-04 and GC-05.

² Refer to complete sections of the Guidelines for more context

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			PPP, as part of the baseline data collection and effects assessment analysis. The list should be consistent throughout the study plan.	that will be engaged with for data collection purposes to support the Economic assessments. There are no other public interests (non- Indigenous communities) in the LSA expected to experience Economic impacts from the project. Other public interests such as land users will be engaged with to support the Land and Resource Use assessment. The study plan for that discipline should be referred to for a list of public interests that will be engaged with.		Provide a workplan that clearly outlines the approach to engage the members of the public listed in the Public Participation Plan in determining the spatial and temporal boundaries specifically for the economic conditions valued component. To meet the requirements of Section 5 of the Guidelines, engagement opportunities must be offered to <u>all</u> members of the public listed in the Public Participation Plan to gather input on the preliminary spatial boundaries proposed by the project team.
EC-05	Section 4.1	Section 11	Required Action # 5: Update the study plan to include additional details on what will be sourced from primary sources, and what will be sourced from secondary information sources so that it is clear where information is being sourced for the criteria and indicators listed in the study plan. Required Action # 6: Update the study plan to provide additional detail on how the collection methodology of primary information would meet the expectations of Section 11 and other relevant sections of the Guidelines.	Primary data sources are identified in Section 7.2.2. As noted in Table 3-1, discussions with the Agency indicated that primary collection would be collected to fill in the gaps from secondary data sources. Section 9.2 of the Study Plan identifies relevant VCs and indicators for the Economic Environment and how primary information will be considered.	Section 7.2.2 "Primary data collection will include field work to collect qualitative data on the Economic Environment within communities potentially affected by the Project (included in Table 6-1)." Section 9.2	Required actions # 5 and # 6 were partially addressed. It is unclear how the determination to only collect qualitative data through the primary data collection field work was made. As a first step in the analysis, secondary sources should be studied to understand the gaps in the available baseline data. Subsequently, to fill potential gaps, primary data collection, qualitative and/or quantitative, may be required. This includes data collection to fill potential information gaps related to GBA+ and baseline economic conditions, as required in Sections 7.1 and 11 of the Guidelines. Provide a rationale on the determination to only collect qualitative data from the anticipated primary data collection field work. In your rationale, include the data gaps and indicators that have not been identified through your secondary data collection that require field work to meet the requirements of Section 11 of the Guidelines.
EC-06	Section 4.2	Section 11	Required Action # 7: Update the study plan to provide additional detail on how the collection methodology of secondary information would meet the expectations of Section 11 and other relevant sections of the Guidelines, including information sources to be used, and for which criteria and indicators they apply.	A list of secondary data sources can be found in Section 7.2.1. Section 9.2 of the Study Plan identifies relevant VCs and indicators for the Economic Environment and which sources of information will be considered.	Sections 7.2.1 and 9.2	Required Action # 7 was addressed.
EC-07	Section 5.1.2	Sections 5 and 6	Required Action # 8: Revise the study plan to describe a methodology and engagement approach that will meet the requirements of Sections 5, 6 and 7.4 of the Guidelines. Required Action # 9: Provide further detail on the rationale that is used to define the PSA, Local Study Area (LSA) and Regional Study Area (RSA) for each valued component, and describe how Indigenous groups and the public have been, or will be, provided an opportunity to inform the spatial and temporal boundaries.	Section 6.2 of the Study Plan identifies how the PDA (formerly PSA), LSA and RSA have been defined for the Project, including for the Economic Environment. Section 6.2.1 of the Study Plan identifies that the study areas can be further refined based on input from neighbouring Indigenous communities and interested persons.	Section 6.2	Required actions # 8 and # 9 were partially addressed. See comments EC-01 and EC-04.
EC-08	Section 5.1.2	Section 1.1	Required Action # 10: Update the study plan to define study areas that capture the Project's economic effects due to potential changes to	As currently defined, the Economic study areas are defined to capture the potential Economic effects of the Project on the surrounding environment. The study areas are also reflective of potential changes to land	Section 6.2.2 "The Economic LSA and RSA were defined based on secondary source information, including existing mapping	Required Action # 10 was partially addressed. Section 7.4 of the Guidelines states that the spatial boundaries should vary depending on the valued component

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			environment, health, social and economic conditions.	use, health, and social conditions that could directly or indirectly impact Economic considerations.	<p>and reports profiling relevant communities, to understand the extent to which community-level socio-economic interest was apparent in the PDA. More specifically, this included assessing the use of the PDA and / or a connection to the Project that has the potential to alter the Economic Environment of a community.”</p> <p>Section 6.2.2 “Communities in the Economic LSA are those who are anticipated to experience noticeable changes due to the Project. Comparatively, communities in the Economic RSA, which is regionally defined, are likely to be impacted by the Project in a less noticeable and more variable manner due largely to their limited use and connection to the PDA and future transportation infrastructure.”</p> <p>Table 6-1 “Communities located in close proximity to the access road such that the Project or resulting access has the potential to directly influence the Economic Environment of these areas. This is the area where most economic impacts are expected.”</p> <p>Section 7.2.2 “The specific scope of the primary data collection program will be informed by the final Economic study areas. However, it is anticipated primary data collection will focus on the communities most likely to be affected by the Project including MFFN and Aroland First Nation (Section 6.2).”</p>	<p>and that the proponent should validate with the Agency the spatial boundaries for each valued component.</p> <p>The local study area proposed in the economic study plan is very narrow and too geographically linked to the Project’s footprint to represent the area of influence and fully capture the potential impacts of the Project on the economic conditions valued component.</p> <p>See also GC-02, GC-04, EC-01 and EC-07.</p>
EC-09	Section 5.2	Sections 11 and 18	<p>Required Action # 11: Update the study plan to include detailed and measurable indicators that meet the requirements in Sections 11 and 18 of the Guidelines.</p> <p>Demonstrate how input received from Indigenous groups through engagement activities were incorporated into the development of the criteria and indicators.</p>	<p>Table 9-2 identifies the valued components, indicators, and sub-indicators that will be considered in the Economic assessment for the Project. This table includes the rationale for selection and potential sources of information.</p> <p>Inputs received to date from Indigenous communities, agencies and interested persons through the Consultation and Engagement Program, including inputs received on the Draft ToR, have also been used to</p>	Table 9-2, Section 9.2	<p>Required Action # 11 was partially addressed.</p> <p>The indicators and sub-indicators presented in Table 9-2 do not adequately specify the indicators that would be collected and assessed to meet the requirements of Sections 11 and 18 of the Guidelines. Specifically, the sub-indicators identified in Table 9-2 lack appropriate detail required to provide useful and meaningful information for the effects assessment.</p> <p>Table 11-1 of the study plan does provide an explanation as to how the requirements of Sections 11 and 18 of the</p>

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				inform the selection of the VCs and indicators for the Economic discipline		<p>Guidelines would be met, which includes a qualitative discussion on the type of indicators that may be used as part of the baseline data requirements. However, Table 11-1 still does not provide specific and measurable indicators, whereas Appendix C of the study plan includes an appropriate example of potential indicators used to measure changes to the labour market.</p> <p>For example, row #5 in Table 11-1 notes that "Sources of income will be considered in Labour market baseline conditions using Statistics Canada data". Additional detail on the specific income-based indicators sourced from Statistics Canada is required to understand how the requirements of Sections 11 and 18 of the Guidelines would be met.</p> <p>Please refer to Appendix C of the study plan for examples of labour market indicators that could be used to meet the requirements of Sections 11 and 18 of the Guidelines. Include additional indicators of the same specificity for the other baseline information requirements as required in Sections 11 and 18 of the Guidelines.</p> <p>Update the study plan to provide additional detail to the response column in Table 11-1 with respect to the specific indicators that would be used to meet the requirements of Sections 11 and 18 of the Guidelines. This should include both quantitative and qualitative indicators that are specific, measurable, and accessible to source.</p>
EC-10	Section 5.2	Sections 11 and 18	Required Action # 12: Update the study plan to provide further detail on the specific economic criteria and indicators that will be collected and assessed through other study plans. At a minimum, provide a cross reference as to where the specific economic criteria and indicators can be found in the other plans.	<p>Section 9.2 identifies which other plans will be collecting data relevant to the Economic Environment.</p> <ul style="list-style-type: none"> - The Social Assessment will document information on housing and infrastructure. - The Land and Resource Use Assessment includes information on industrial land uses and tourism establishments. - Elements of the traditional economy are covered in the Aboriginal and Treaty Rights and Interests Assessment. Findings and data included in these disciplines will be considered under relevant components of the Economic Assessment, as applicable. 	Section 9.2; Social Study Plan Land and Resource Use Study Plan, Aboriginal and Treaty Rights and Interests Study Plan	Required Action # 12 was addressed.
EC-11	Section 7, Table 5		Required Action # 13: Demonstrate that this study plan reflects the inclusion of all requirements outlined in the Guidelines and describe the approaches to collect the information.	Table 11-1 is a comprehensive list of the requirements of the Guidelines. This table responds to each requirement from the Guidelines and provides an updated Study Plan reference section to clearly identify where within the Study Plan each requirement is being considered. In the Economic study plan, Table 11-3 identifies the areas of non-conformance along with their justification.	Tables 11-1 and 11-3	<p>Required Action # 13 was addressed.</p> <p>Proposed amendments and/or deviations from the Guidelines will not be reviewed or approved during the study plans review process.</p> <p>The Agency will provide guidance on the process to propose amendments and/or deviations to the Guidelines to the project team.</p>

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EC-12	Section 4.2 Indigenous Communities - Table 4-1: "...Identified Neighbouring Indigenous Communities, including their Provincial Territorial Organizations and / or Tribal Council Affiliations..."	<p>Section 19.1 "...As a best practice, proponents are encouraged to also include the following: - a commitment to preferentially employ Indigenous people from Indigenous groups identified in the <i>Indigenous Engagement and Partnership Plan</i> and use of the Northern Ontario Network of Indigenous Training Organizations (e.g., Indigenous Skills and Employment Training network);..."</p> <p>Section 20 "...The Impact Statement must: - describe education, training, hiring practices that encourage employment of local people , including the use of the Northern Ontario Network of Indigenous Training Organizations (e.g., the Indigenous Skills and Employment Training network);..."</p>	<p>The study plan indicates that consultation and engagement activities and key informant interviews would take place with Indigenous groups and/or local municipalities; however, there is a need to ensure that the Northern Ontario Network of Indigenous Training Organizations {e.g. Indigenous Skills and Employment (ISET) Program network} is knowledgeable of the activities related to the Project.</p> <p>It is important that communities are informed of all programs related to the Project, including the timeframe for the employment or opportunity, how long such opportunities will be available, types of jobs available, plans that would encourage employment, procurement and contracting opportunities for Indigenous peoples and communities.</p>	<p>Describe in the Impact Statement the education, training and hiring practices that would encourage employment of local people, including the use of the Northern Ontario Network of Indigenous Training Organizations, to meet the requirements of Section 20 of the Guidelines.</p> <p>It is recommended that the ISET Program service delivery network be mentioned in Section 4.2 and in Table 4-1 of the study plan.</p> <p>Additional information pertaining to the ISET Program service delivery network: There are currently 22 Indigenous service delivery organizations across Ontario (the link to the current service delivery network: https://www.canada.ca/en/employment-social-development/programs/indigenous-skills-employment-training/service-delivery-organizations.html#a4).</p> <p>In Northern Ontario there are currently nine service delivery organizations. Details of the nine service delivery organizations in Northern Ontario are below. {Kiikenomaga Kekenjigewen Employment and Training Services (KKETS) is the local service delivery organization.}</p> <p>ISET Service Providers in Northern Ontario:</p> <ol style="list-style-type: none"> 1. Wabun Tribal Council (Mamo-Nuskomitowin) - which is located in Timmins and serve the North East communities of Brunswick House, Chapleau Ojibway, Flying Post, Matachewan, Mattagami, Wahgoshig) 2. Kiikenomaga Kikenjigewen Employment and Training Services (KKETS) - based Thunder Bay, serves the Matawa First Nations, including Marten Falls and Webequie. 3. Wikwemikong Unceded Indian Reserve - provides services to First Nations on and near Manitoulin Island (e.g. Wiki, Curve Lake), as well as Sudbury ON and the surrounding areas. 4. Mamaweswen – The North Shore Tribal Council - based out of Cutler, Ontario. Serves the First Nations in the area near Elliot Lake, Blind River, Algoma, etc. 5. Anishinabek Nation (Union of Ontario Indians) - based in North Bay but serves clients from NE to NW Ontario - Thunder Bay (Bijnjitiwaabik Zaaging Anishinaabek/Rocky Bay, Binqwi Neyaashi Anishinaabek/Sandpoint, Kiashke Zaaging Anishinaabek/Gull Bay, Animbiigoo Zaagi'igan Anishinaabek/Lake Nipigon, Michipicoten, Ojibways of Pic River, Pays Plat, Pic Mobert, Red Rock/Lake Helen). 6. Aboriginal Labour Force Development Circle (First Nation) - provides services to people living in urban settings and on-reserve, including Batchewana Bay, Sudbury, Sault Ste. Marie and more in Northern Ontario. 7. Shooniyaa Wa-Biitong - based in Kenora NW Ontario, with a catchment area throughout Treaty 3 which includes Kenora (Anishnaabeg of Naongashiing/Big Island, Big Grassy,

³ Refer to complete sections of the Guidelines for more context.

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				<p>Couchiching, Grassy Narrows, Iskatewizaagegan # 39, Lac Des Mille Lacs, Lac La Croix, Naicatchewenin, Naotkamegwanning/Whitefish Bay, Nicickousemenecaning, Northwest Angle # 33, Northwest Angle # 37, Lac Seul, Ochiichagwe'babigo'ining/Dalles, Ojibways of Onegaming/Sabaskong, Onigaming, Rainy River, Nicickousemenecaning, Seine River, Shoal Lake #40, Stanjikoming, Wabaseemoong/Islington, Wabauskang, Washagamis Bay, Wauzhushk Oningum/Rat Portage).</p> <p>8. Sioux Lookout Area Aboriginal Management Board (SLAAMB) – based in Sioux Lookout NW Ontario, with a catchment area that includes Sioux Lookout (Bearskin Lake, Cat Lake, Deer Lake, Fort Severn, Kasabonika, Kee-Way-Win, Kingfisher, Kitchenuhmaykoosib Inninuwug/Big Trout Lake, Koocheching, Eagle Lake, McDowell Lake, Mishkeegogamang/Osnaburgh, Muskrat Dam, New Slate Falls, North Caribou Lake, North Spirit Lake, Pikangikum, Poplar Hill, Sachigo, Sandy Lake, Saugeen/Savant Lake, Wapekeka, Wabigoon Lake, Wawakapewin/Long Dog, Wunnumin).</p> <p>9. Mushkegowuk Council Employment & Training Service (METS) - serves the communities of Moose Factory (Fort Albany Attawapiskat, Chapleau Cree, Kashechewan, Missanabie Cree, Mocrebec, Moose Cree, Taykwa Tagamou, Weenusk/Peawanuck).</p>
EC-13	<p>Section 4.3 "...When feedback is received from interested persons and Indigenous communities, issues, comments and questions will be tracked, which is consistent with the process described in the IS / EA Consultation Plan. Specific to Gender-Based Analysis Plus (GBA Plus) objectives, this will include efforts to engage with diverse populations. It is expected this will include activities specific to subgroups and tabulation of consultation and engagement participation with respect to identity factors. This will provide summary statistics to demonstrate the diversity achieved in consultation and engagement..."</p>	<p>Section 11 "This economic baseline should document the local and regional economic conditions and trends based on the spatial and temporal boundaries selected, and must include economic indicators and activities for all potentially impacted local communities, including municipalities, and Indigenous groups. The scope and content of the economic baseline should be tailored to the specific project context, take into account community and Indigenous group input, and should include indicators and information that are useful and meaningful for the effects analysis. The information provided must: - be sufficient to provide a comprehensive understanding of the current state of each valued component, including relevant trends; - describe how community and Indigenous knowledge from related populations, including <u>input from diverse groups</u>, was used in establishing baseline conditions; - <u>describe baseline economic conditions using disaggregated data and gender-statistics for diverse subgroups within the community to support GBA+;</u> - conduct intersectional gender analysis to examine differences in the status of diverse subgroups (e.g., women, youth, and elders) and their differential access to resources, opportunities and services; and - describe any relevant indicators."</p>	<p>The study plan outlines opportunities for engagement with neighbouring Indigenous communities and non-Indigenous communities; however, there is no clear indication that this data will be disaggregated as required by Section 11 of the Guidelines.</p> <p>Summary statistics will not provide an intersectional gender analysis and will not achieve GBA Plus objectives that are needed to ensure diverse and inclusive engagement has occurred.</p>	<p>Update the study plan to demonstrate how engagement activities and surveys are designed to collect disaggregated data of diverse groups and subgroups to clearly identify the segments of the population that were/will be consulted and engaged during the preparation of the Impact Statement in order to meet the requirements of Sections 11 and 18 of the Guidelines.</p>

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		<p>Section 18 "...The proponent must analyze the community and Indigenous knowledge across diverse subgroups where possible to identify differential effects highlighted by these groups..."</p> <p>"...In assessing effects to valued components listed [in Section 18], the analysis should discuss circumstances in a community where diverse subgroups, because of their particular circumstances, could experience adverse effects from the Project more severely than others, or be excluded from potential benefits, including Indigenous peoples or other community relevant subgroups (e.g., women, youth, elders)..."</p>		
EC-14	<p>Section 4.4 "...As part of the IS / EA Consultation Plan (AECOM 2020) and Indigenous Knowledge Program, Indigenous communities identified in Table 4-1 will be contacted to determine their level of interest in the Project and their concerns related to potential economic impacts. For the Indigenous communities that express specific economic concerns, targeted economic data collection will be implemented through the economic data collection program, consistent with the likelihood of effect anticipated to the community as defined by the MFFN CAR Project Team. In addition, interested persons identified through the general engagement program and listed in the Public Participation Plan (the Agency 2020) may also be engaged on potential economic concerns and impacts. Section 7.2 provides additional details on the targeted economic data collection approach..."</p>	<p>Section 6.2 "...The Impact Statement must also document how the proponent responded to questions, comments and issues raised by Indigenous groups, and how unresolved matters have been addressed. Any proposed mitigation measures are to be clearly linked, to the extent possible, to valued components in the Impact Statement as well as to specific project components or activities. The analysis and responses are to include: - a comprehensive list of all issues, questions and comments raised during the engagement activities by each Indigenous group and the proponent's responses, including how matters have been addressed in the Impact Statement or will be addressed through the impact assessment (including but not limited to avoidance, mitigation or other measures to address potential effects or impacts on the exercise of rights of Indigenous peoples);... ...- if engagement with certain Indigenous groups is not possible, rationale must be provided, including, as applicable, an outline of efforts made;... - where and how Indigenous groups' knowledge, perspectives and input were integrated into or contributed to decisions regarding the Project (e.g., project design), including: o scoping, development and collection of baseline information; o plans for construction, operation, decommissioning, abandonment, and maintenance; and o follow-up and monitoring. -where and how Indigenous groups' knowledge, perspectives and input were integrated in the characterization of the nature of environmental, health, social and economic effects and impacts expected from the Project for each Indigenous group; ..."</p> <p>Section 12 "...If an Indigenous group has</p>	<p>The study plan does not describe how information will be shared with participants that may be interested but face barriers to participate. Certain populations may be less likely to express their views voluntarily, and steps should be taken to remove barriers to ensure their participation.</p> <p>A description of efforts to engage with individuals or groups that may face barriers to participate should be provided to demonstrate engagement effort, as per Sections 6.2 and 12 of the Guidelines.</p>	<p>Describe in the study plan actions taken and to be taken to raise interest in the Project from Indigenous groups who may face barriers to participate in engagement activities.</p> <p>Clarify how information will continue to be shared with participants and Indigenous groups who may face barriers to participate in engagement activities.</p> <p>For the Indigenous groups that do not wish to participate, provide a rationale in an updated study plan by describing the barriers and the efforts made to overcome them, as per Sections 6.2 and 12 of the Guidelines. Include in the Impact Statement detailed descriptions of the Indigenous groups that are being engaged and of those that do not wish to participate.</p>

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		<p>chosen not to participate, the proponent should identify the community and provide evidence of efforts to engage...</p> <p>...Where Indigenous groups do not wish to participate, the proponent is encouraged to continue sharing information and analysis with the Indigenous groups of the potential effects of the Project, and to use available public sources of information to support the assessment....”</p>		
<p>EC-15</p>	<p>Section 7.3 “...The study methods that will be employed to characterize the economic baseline conditions include data collection, data analysis and qualitative descriptions and profiling. Multiple sources of data, including primary, secondary, engagement and Indigenous Knowledge, will be utilized for the purposes of economic data collection. Data collection methods are detailed in Section 7.2. The data collection process can be conceptualized as a matrix. For each indicator listed in Section 9.2, data will be collected for different groups of interest (e.g., communities, subgroups within the community). The data collected will be tracked and assessed using this approach, and, when required, primary data collection will target information gaps identified in the matrix. Data analysis will involve classifying, comparing and interpreting the data collected in line with this matrix approach....”</p>	<p>Section 7.1 “The Impact Statement must provide a description of the environmental, health, social and economic setting directly and incidentally related to the Project. This should include the 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,...”</p> <p>Section 13.1 “...The assessment of the effects of each of the project components and physical activities, in all phases, must be based upon a comparison of baseline environmental, health, social and economic conditions and the predicted future conditions with the Project and the predicted future conditions without the Project....”</p>	<p>Information regarding the methodology for conducting economic analysis, estimating figures and impacts, and forecasting is not provided in sufficient detail to meet the requirements of Sections 7 and 13 of the Guidelines.</p>	<p>Update the study plan to provide further detail on the methodology that was/will be used to conduct economic analysis, estimating figures and impacts, and forecasting in order to meet the requirements of Sections 7 and 13 of the Guidelines.</p>
<p>EC-16</p>	<p>Section 9, Table 9.2 - Economic Indicators “...Economic Opportunity Sub Indicators</p> <ul style="list-style-type: none"> ▪ Change in business opportunity ▪ Change in regional economic activity ▪ Change in output ▪ Change in GDP value-added <p>Procurement Sub indicators</p> <ul style="list-style-type: none"> ▪ Value of procurement opportunities associated with the Project <p>Employment Sub Indicators</p> <ul style="list-style-type: none"> ▪ Change in job opportunities ▪ Change in labour income <p>Training opportunities...”</p>	<p>Section 11 “...The information provided must: ...</p> <ul style="list-style-type: none"> ○ conduct intersectional gender analysis to examine differences in the status of diverse subgroups (e.g., women, youth, and elders) and their differential access to resources, opportunities and services; and ○ describe any relevant indicators...” 	<p>When describing an indicator, the wording “change” by itself does not capture what will be evaluated (e.g. number of jobs created, new businesses opened/closed, and value of procurement to local or regional Indigenous / non Indigenous businesses). For example, change in business opportunity in itself is not a measurable indicator and it is not specific.</p> <p>Clarification is needed to help understand the scope and magnitude of the “change” overall and also among the sub-groups of local and regional population through an intersectional analysis, and offer a systematic approach to the next steps of measurement and monitoring. In order to fully understand the economic changes and its associated impacts, the change itself, whether positive, negative, or unintended, needs to be outlined and explained.</p> <p>The study plan does not provide sufficient details about “Training opportunities” related to the Project to meet the requirements of Section 11 of the Guidelines.</p>	<p>Update the study plan to specify each variable that will be used to characterize the “change” (positive, negative, or unintended) related to the indicators identified, to meet the requirements of Section 11 of the Guidelines.</p> <p>Update the study plan to provide more details about “Training opportunities” related to the Project.</p> <p>Consider describing potential training that would be provided to local and regional individuals to fit the Project’s needs.</p>

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EC-17	<p>Section 9.2 - Table 9-2 "...Economic opportunity, change in business opportunity and change in regional economic activity..."</p>	<p>Section 11 "...Overall economy: o a brief overview of the regional economy in recent years..."</p> <p>Section 18.1 "The Impact Statement must: o describe the effects of the Project on the local and regional labour markets;..."</p> <p>Section 18.3 "The Impact Statement must: o describe the potential positive and negative effects of the Project on local and regional businesses, during both construction and operation phases of the Project,..."</p>	<p>The study plan does not define the indicator "Economic opportunity" and the sub-indicators "change in business opportunity" and "change in regional economic activity" presented in Table 9-2 with sufficient detail to meet the requirements of Sections 11, 18.1 and 18.3 of the Guidelines.</p>	<p>Update the study plan to provide further detail to clearly define the indicators presented in Table 9-2 and how changes will be evaluated and interpreted within those variables.</p>
EC-18	<p>Section 9.2, Table 9-2 "...estimated price changes at an order of magnitude level for key consumptive goods..."</p>	<p>Section 11 "...The Impact Statement must provide information on the following economic conditions related to the Project and the economic opportunities: • Labour market: ... o housing and consumer prices;..."</p> <p>Section 18.2 "The Impact Statement must: ... • describe the effects of the Project on availability of goods and services and consumer prices, in particular for o food; o fuel; and o electricity."</p>	<p>The study plan does not define the sub-indicator "estimated price changes at an order of magnitude level for key consumptive goods" with sufficient detail to meet the requirements of Section 18.2 of the Guidelines. It is not clear what is meant by "estimated price changes at an order of magnitude level."</p>	<p>Update the study plan to specify the key consumer goods to define the sub-indicator "estimated price changes at an order of magnitude level for key consumptive good", in order to meet the requirements of Section 18.2 of the Guidelines.</p> <p>In addition, clarify the meaning of "estimated price changes at an order of magnitude level". Does this mean that price changes will only be registered if they change by a factor of ten? If so, more precision is needed with respect to price levels.</p>
EC-19	<p>Section 9.2 - Table 9-2 "...traditional economies..."</p>	<p>Section 11 "...Overall economy: o a brief overview of the regional economy in recent years..."</p> <p>Section 18.1 "The Impact Statement must: o describe the effects of the Project on the local and regional labour markets...."</p> <p>Section 18.3 "The Impact Statement must: o describe the potential positive and negative effects of the Project on local and regional businesses, during both construction and operation phases of the Project,..."</p>	<p>The study plan does not define the indicator "traditional economies" with sufficient detail to meet the requirements of Sections 11, 18.1 and 18.3 of the Guidelines.</p>	<p>Provide further detail to define clearly the indicator "traditional economies" and how changes will be evaluated and interpreted.</p>

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EC-20	Section 9.2, Table 9-2 “...change in job opportunities...”	<p>Section 11 “...The Impact Statement must provide information on the following economic conditions related to the Project and the economic opportunities:...</p> <ul style="list-style-type: none"> • Overall economy: <ul style="list-style-type: none"> ○ a brief overview of the regional economy in recent years (e.g., if there have been any major investments or closures, if the area’s resources and products have been in high or low demand, etc.);... <p>Section 18.1 “ The Impact Statement must:</p> <ul style="list-style-type: none"> • describe the effects of the Project on the local and regional labour markets,” and “describe any skills-matching issues related to the Project...” 	Due to the limited data available at the regional level, it will be difficult to evaluate the regional change in job opportunities (as opposed to change in employment) caused by the Project. Consider replacing this sub-indicator with “permanent change in employment” and “temporary change in employment,” which would be easier to evaluate.	
EC-21	Section 9.2 -Table 9-2 “...training opportunities...”	<p>Section 11 “...Overall economy:</p> <ul style="list-style-type: none"> ○ a brief overview of the regional economy in recent years...” <p>Section 18.1 “ The Impact Statement must:</p> <ul style="list-style-type: none"> ○ describe the effects of the Project on the local and regional labour markets,” and “describe any skills-matching issues related to the Project...” 	The study plan does not define the sub-indicator “training opportunities” with sufficient detail to meet the requirements of Section 18.1 of the Guidelines. (Does it refer to training opportunities by the proponent, whether on-location or not, or to training opportunities in other locations that will become more easily accessible once a road is built, or to both?)	Update the study plan to provide further detail to define clearly the sub-indicator “training opportunities” offered and how changes will be evaluated and interpreted, in order to meet the requirements of Section 18.1 of the Guidelines.
EC-22	Section 9.2 -Table 9-2 ...Value Component, Labour Force and Employment – specifically under sub-heading Source of Information...”	<p>Section 20 “...The Impact Statement must: ...</p> <ul style="list-style-type: none"> • describe education, training, hiring practices that encourage employment of local people, including the use of the Northern Ontario Network of Indigenous Training Organizations (e.g., the Indigenous Skills and Employment Training network);... 	<p>The study plan mentions that engagement activities and key informant interviews would take place with Indigenous groups, however, there is a need to ensure that the Northern Ontario Network of Indigenous Training Organizations (e.g. ISET Program service delivery network) is made aware of all training or education programs or scholarships the proponent is supporting to enhance employment opportunities for local residents.</p> <p>It is recommended to include under the value component “Labour Force and Employment” and specifically under sub-heading “Source of Information” the ISET Program service delivery network.</p>	
EC-23	Section 9.2 -Table 9-2	<p>Section 2.2 “...If the Project is part of a larger sequence of projects, the Impact Statement must outline the larger context, including likely future developments by other proponents that may use project infrastructure, and activities that may be enabled by the current Project.”</p>	<p>Consider the following two reports as sources of information for economic analysis:</p> <ul style="list-style-type: none"> ○ The Mining Industry in Northwestern Ontario: An Analysis of Recent Development and the Strategy for Success (Northern Policy Institute, 2016) ○ Mining and Exploration Report (Thunder Bay Community Economic Development Commission, 2019) 	
EC-24	Section 9.2 -Table 9-2 “...Economic Opportunity...”	<p>Sections 11 and 18</p>	<p>Table 9-2 lists the indicator “<i>economic opportunity</i>” and four sub-indicators, including “<i>change in business opportunity</i>” and “<i>change in regional economic activity</i>”. However, the study plan does not provide any additional information on these sub-indicators, including what would be measured or how it would be measured.</p> <p>The information provided is not sufficient to clarify the approach planned to estimate project impacts on economic opportunities will be estimated and to determine</p>	Include in the updated study plan further detail on the proposed variables identified to measure changes to economic opportunities and to economic activities, in order to demonstrate how the requirements of Section 18 of the Guidelines will be met.

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			whether the requirements of Section 18 of the Guidelines would be met.	
EC-25	Section 9.2 -Table 9-2 "...Procurement <ul style="list-style-type: none"> The Project will require the procurement of goods and services – possibly from firms within the local area..." 	Section 11 "...The Impact Statement must provide information on the following economic conditions related to the Project and the economic opportunities: ... <ul style="list-style-type: none"> Business environment:... <ul style="list-style-type: none"> broader economic contributors to the regional economy, such as small businesses (e.g., nature and outdoor tourism);... 	Information regarding how the potential for local businesses to fulfill procurement needs will be estimated should be provided to meet the requirements of Section 11 of the Guidelines. For example, are there efforts to assess capacity of local companies to participate in procurement processes?	Include in the updated study plan further detail on how the potential for local businesses to fulfill procurement needs will be estimated, in order to meet the requirements of Section 11 of the Guidelines. The Impact Statement should describe the overall procurement needs and share to be fulfilled by local businesses.
EC-26	Section 9.2 -Table 9-2 "...Price of Goods..."	Section 18.2 "The Impact Statement must: <ul style="list-style-type: none"> describe the predicted positive and adverse effects to accommodation/lodging, including housing supply, housing costs, and rental rates, both during the construction and operation phases; and..." 	The current source of information is primary data, which would only cover existing/current prices. It is unclear how predicted adverse and positive effects over the life of the Project would be forecasted.	Include in the updated study plan further information on how changes in the price of goods through the project life will be forecasted, in order to meet the requirements of Section 18.2 of the Guidelines.
EC-27	Section 9.2 -Table 9-2 "...Employment..."	Section 18.3 "The Impact Statement must: <ul style="list-style-type: none"> describe the potential positive and negative effects of the Project on local and regional businesses, during both construction and operation phases of the Project, including: ... <ul style="list-style-type: none"> an estimate of potential effects of the Project on the traditional economy, including the potential loss of traditional economies and jobs; and..." 	Section 18 of the Guidelines requires a description of positive and negative economic impacts of the Project on the economic conditions. The study plan seems to focus mostly on the potential positive effects (rational for selection); however, negative effects should be considered as well.	Include in the updated study plan details on how job shifts in the local community will be assessed, including potential negative impacts such as loss of local employment, in order to meet the requirements of Section 18.3 of the Guidelines.
EC-28	Editorial Section 9.2 -Table 9-2: "...Primary data (e.g., interviews with community members / key contacts; area businesses, municipal economic development office);..."	Section 18 "...The proponent must analyze the community and Indigenous knowledge across diverse subgroups where possible to identify differential effects highlighted by these groups..."	The study plan seems to indicate that the valued component "Labour Force and Employment" described in Table 9-2 will be informed by Indigenous knowledge as primary data source of information, but that is not clearly indicated in the table.	Update Table 9-2 of the study plan to list "Indigenous knowledge" amongst the "sources of information" in addition to "community interviews and knowledge".
EC-29	Section 9.3 "...A direct effect occurs through the direct interaction of an activity with an environmental discipline. The Project-environment interactions currently anticipated, based upon preliminary analysis, to result in direct effects to the Economic discipline have been identified in Table 9-1...."	Section 18 "...The assessment must illustrate an understanding of linkages and effect pathways, so that when a change in one domain is predicted, there is an understanding of what other effects or consequences may be felt across the other domains..."	Section 9.3 of the study plan refers to a preliminary analysis that was completed by the Proponent to determine the direct effects of the Project on the environment, health, social or health conditions. This analysis was not included in the study plan, and so, it is unclear how these preliminary conclusions, illustrated in Table 9-1, were drawn. As required in Section 18 of the Guidelines, the effects assessment should illustrate an understanding of effect pathways, and potential linkages to other effects. The study plan does not provide an analysis on how those direct effect pathways were determined.	Update the study plan to include a description of the preliminary analysis conducted that informed Table 9-1.
EC-30		Section 16.2 "With respect to Social Determinants of Health, the Impact Statement must: ... <ul style="list-style-type: none"> Consider adverse and positive effects on health (i.e., overall well-being) based on the social and economic valued components, and their respective indicators, as outlined in Sections 17 and 18. Specific priority 	The study plan provides no information regarding mitigation measures for potential high school drop-out youth. Compared to high school graduates, high school drop-out Canadians are less likely to find a job (a good quality job) and more likely to live in poverty, which may negatively affect the community in the long-term. Training	Include in the Impact Statement mitigation measures against rates of potential high school drop-out youth.

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		indicators must be determined or validated by community members but may include, for example: ... <ul style="list-style-type: none"> o Level-3 health determinants related to structural and equity factors (e.g., potential indicators related to income, high school drop-out rates associated with seeking project-related employment) that may affect Level 2 determinants of health." 	opportunities and access to good quality jobs may mitigate the impact of high school drop-out.	
EC-31	Section 9.4 "...As a result, it is proposed input-output multipliers developed by the Northern Policy Institute be used to consider economic effects at an unorganized district level or provincial-level consistent with the economic RSA (Moazzami 2019a). If this approach is utilized, provincial multipliers will be used to scale the regional multipliers when multipliers are not available through the Northern Policy Institute. Alternatively, Statistics Canada's National Input-Output model will be used to conduct a provincial level assessment of economic effects. The best practices method will be determined depending on the planned procurement of goods and service by the Proponent..."	Section 18.6 "...Where a generic multiplier may not accurately reflect the specific situation of the Project being assessed, evidence should be provided of specific economic activity that will result from the Project going ahead..."	The study plan does not provide sufficient evidence on the specific economic activity that will be assessed using the multipliers developed by the Northern Policy Institute. In addition, the study plan does not refer to the specific multipliers that are intended to be used in the assessment. The study plan seems to indicate that there is uncertainty whether or not this approach will be utilized, but no alternative methodologies are indicated.	Update the study plan to indicate the specific multipliers that will be used from the Northern Policy Institute, and indicate how each multiplier will be used to meet the requirements under Section 18 of the Guidelines. Update the study plan to clarify potential alternative methodologies under consideration.
EC-32	Section 9.4 "...Input-output modelling is linear with a simplified macro-economic structure which removes key variables such as price-level, interest rates and unemployment rates (Statistics Canada 2009). Due to the reliance on existing economic relationships, price volatility can corrupt the linear relationships contained within these models making them less reliable, particularly over time (Statistics Canada 2009)...."	Section 13.1 "...The description of the effects can be either qualitative or quantitative. Effects must be described using criteria to quantify or qualify adverse effects, taking into account any important contextual factors. With respect to quantitative models and predictions, the Impact Statement must detail the model assumptions, parameters, the quality of the data and the degree of certainty of the predictions obtained..." Section 18.1 "The Impact Statement must: <ul style="list-style-type: none"> • describe the effects of the Project on the local and regional labour markets;... • describe longer-term labour market local and regional labour market effects as a result of the project;..." Section 18.2 "The Impact Statement must:... <ul style="list-style-type: none"> • describe the effects of the Project on availability of goods and services and consumer prices, in particular for <ul style="list-style-type: none"> o food; fuel; and o electricity." 	It is unclear how changes to consumer process and labour market would be assessed to meet the requirements of Section 18 of the Guidelines. The study plan should propose appropriate economic analysis methodologies to measure the potential changes of the Project as described in Section 18 of the Guidelines.	Update the study plan to include specific examples of the economic analysis methodologies that are anticipated to be used to meet the requirements of Section 18 of the Guidelines, including the specific indicators that would be assessed to measure and express potential impacts to the baseline economic condition due to the Project.

New comments from the Federal Review Team on the Marten Falls Community Access Road Project Economic Study Plan submitted in June 2021

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EC-33	<p>Section 11, Table 11-1 "...the IS / EA Report will describe changes to direct, indirect and induced employment, which affects the regional labour market. This will include jobs by phase of the Project and will include expected rates of pay. A GBA+ analysis will be undertaken on these opportunities..."</p>	<p>Section 3.3 "...the Impact Statement must include Gender Based Analysis Plus GBA+ in its discussion of workforce requirements to describe any potential differential effects for diverse subgroups in the community. This must include a discussion of how hiring policies and programs, access to employment and training opportunities, investment in training, workplace policies and programs take into consideration vulnerable or underrepresented groups, including Indigenous people or other community relevant subgroups (e.g., women, youth, elders)."</p> <p>Section 18.1</p>	<p>Further detail is required regarding the consideration of vulnerable demographics/intersectional identity factors, number of local/regional workers and childcare requirements to meet the requirements of Section 3.3 of the Guidelines.</p> <p>While Table 11.1 of the study plan mentions barriers, an explicit bullet should be provided, within the labour market cells, to highlight the interconnectedness of labour market participation and availability of child care, particularly given the demographics of, and rapid growth within, the Indigenous population.</p>	<p>Update the study plan to include an approach for baseline data collection that describes in detail the extent to which vulnerable demographics/intersectional identity factors (i.e.; older workers age 45-64, youth, people with less than high school, women, persons with disability, recent immigrants, etc.) would be impacted by job opportunities, loss/displacement during the construction and closure phase of the project. This information would help inform potential cumulative socioeconomic impacts.</p> <p>Update the study plan to include an estimate of the number of local / regional workers (from diverse sub-groups) and their skill levels based on the National Occupational Classification.</p> <p>Include in the Impact Statement an assessment of child-care requirements in relation to any employment opportunities or shifts in the labour market as a result of the Project.</p>
EC-34	<p>Section 11, Table 11-3 "...These principles will inform both primary and secondary data collection to support the Economic Assessment. Further, the Proponent will document baseline data consistent with these principles. The exception is data will not be disaggregated by gender as Statistics Canada does not disaggregate based on gender. Data disaggregated based on sex will be included..."</p>	<p>Section 13.1 "The Impact Statement must describe in detail the project's potential adverse and positive effects in relation to each phase of the designated project (construction, operation, maintenance, suspension, decommissioning, and abandonment). The environmental, health, social or economic effects should be described in terms of the context, magnitude, geographic extent, ecological context timing, duration and frequency, and whether effects are reversible or irreversible... As applicable, the effects assessment must be sufficiently disaggregated and analysed to understand differences in norms, roles and relations for diverse subgroups; the different level of power they hold; their differing needs, constraints and opportunities, and the effects of these differences in their lives including consideration of disproportionate effects to surrounding communities..."</p>	<p>Section 11 of the economic study plan indicates that "<i>data will not be disaggregated by gender as Statistics Canada does not disaggregate based on gender</i>".</p> <p>Where possible, primary data should be disaggregated to support impact and effects analysis of differences among diverse subgroups, to meet the requirements in Section 13.1 of the Guidelines. A rationale to explain the extent or limitations with the data disaggregation should be provided.</p>	<p>See comment GC-06.</p> <p>Include in the Impact Statement the detailed rationale that explains the extent and limitations with data disaggregation in the effects assessment.</p> <p>It is recommended that secondary data collection sources be analyzed in order to address gaps in data collections. If Statistics Canada does not disaggregate data based on gender, then peer-reviewed, published "academic research" should be consulted as a source for community labour and employment information.</p>
EC-35	<p>Editorial - Footnote 8, Section 9.2 "In February 2020 a regional assessment of the Ring of Fire region commenced; however, it is not sufficiently advanced at this time to inform the Project VCs. The VCs will be consulted and engaged on early in the IA/EA process and finalized taking into consideration the input received. Therefore, only information relevant to the Project that arises from the regional assessment of the Ring of Fire within an appropriate timeline will inform the VCs for the Project."</p>		<p>The statement in the footnote 8 in Section 9.2 "<i>In February 2020 a regional assessment of the Ring of Fire region commenced; however, it is not sufficiently advanced at this time to inform the Project VCs.</i>" is inaccurate, as the Regional Assessment in the Ring of Fire area has not yet begun.</p>	<p>Replace the text in footnote 8 with "<i>In February 2020, the Minister of Environment and Climate Change determined that a regional assessment will be conducted in an area centred on the Ring of Fire mineral deposits in northern Ontario. Relevant information available in relation to the Regional Assessment in the Ring of Fire area would be considered in the impact assessment of the Project.</i>"</p>
EC-36	<p>Table 11-3: Study Plan Federal and Provincial Concordance – Requirement Deviations</p>		<p>Proposed amendments and/or deviations from the Guidelines will not be reviewed or approved during the study plans review process.</p> <p>The Agency will provide guidance on the process to propose amendments and/or deviations to the Guidelines to the project team.</p>	

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EC-37	<p>Section 7.3 "...For each of the valued components that will be assessed in the Impact Statement, the proponent must create a study plan and a work plan to be validated by the Agency. Upon receipt of a study plan, the Agency may request that the proponent present and discuss the study plan at technical meetings, which will be scheduled during the impact statement phase..."</p>	<p>In order to meet the requirements of Section 7.3 of the Guidelines, a work plan for each valued component must be submitted to the Agency for validation.</p>	<p>Since the economic study plan does not outline when baseline data will be collected for each Indigenous group (i.e., scheduling, sequencing), the submission of a work plan that provides this information is required.</p>	<p>Provide a work plan that outlines how the economic study plan will be executed in the field, including when baseline data will be collected. The work plan should include scheduling and sequencing of engagement activities relative to proposed baseline work, engagement on the study plan, spatial and temporal boundaries determinations, and particularly in relation to collection of Indigenous knowledge.</p>