Comments from the Federal Review Team on the Marten Falls Community Access Road Project Economic Work Plan and Land and Resource Use Work Plan – September 7, 2022

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/work 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 work 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.

Comments from the Federal Review Team on the Marten Falls Community Access Road Project Economic Work Plan submitted in June 2022				
ID #	**Work Plan Section**	**Guidelines Section[1]**	**Context**	**Required Action for Proponent**
EC-WP-01	**Section 2** "The approach and the study areas for the Economic Environment are defined in the Economic Study Plan (MFFN CAR 2021), which have been based on discussions held with both federal and provincial regulators. The study areas for the Economic data collection activities and assessment is shown in Figure 2-1."		Section 2 of the work plan states that the approach and study areas for the Economic Environment are defined in the Economic Study Plan (MFFN CAR 2021), which have been based on discussions held with both federal and provincial regulators. As drafted, this statement gives the impression to readers that the Federal Review Team (FRT) is in agreement with the economic study plan, including the definition of the study areas. This is incorrect as the FRT provided several comments on the economic study plan, some of which were not addressed in a satisfactory way.	Edit the work plan to remove the statements that suggests the FRT approved the economic study plan or any portion thereof, such as the study areas.
EC-WP-02	**Section 2** As discussed in the Economic Study Plan, the socio-economic primary data collection program will focus on Local Study Area (LSA) communities, including MFFN, Aroland First Nation (AFN), and the Municipality of Greenstone; however, the Proponent remains open to receiving further information from communities demonstrating economic interests/possible impact from the Project, which could result in additional communities being included in the LSA and their inclusion in the Economic data collection program. **Table 2-1:** Economic Data Gap Analysis; Method to Address Existing Gap. **Table 3.1** Confirm LSA communities (i.e., additional community demonstrating economic interests that may be affected by the Project) through Project consultation and engagement activities. Note: dependent on communities' willing to engage and provide feedback on their interests.	**Section 5** - Public Participation and views (including 5.1, 5.2) **Section 6** - Description of Engagement with Indigenous Groups (including 6.1, 6.2, 6.3) **Section 7** - Baseline conditions (including 7.4)	Relevant feedback provided in the past by the FRT on spatial boundaries was not taken into consideration. The Agency expects all comments provided during the study plans review be incorporated in the Impact Statement.	Refer to the feedback provided in the document: "Comments from the Federal Review Team on Marten Falls Community Access Road Project Economic Study Plan – October 25, 2021", in particular comment GC-01, GC-02, GC-04 and EC-05.
	Table 3.1 Commence primary data collection with MFFN, Municipality of Greenstone, economic development corporations, and business owners.			
	Table 3.1 Commence primary data collection with Aroland First Nation			
EC-WP-03	**2.1.1 Secondary Data Collection and Gap Analysis / Table 2-1: Economic Data Gap Analysis / VC: Labour Force and Employment**	**Section 7** – Baseline Methodologies (Including 7.1, 7.2, 7.3, 7.4)	While the Census provides valuable information, the FRT recommends identifying opportunities to incorporate information and evidence from other sources, including statistical holdings from various levels of government, reports from non-governmental organization, academic sources and that the proponent complement quantitative and academic resources with qualitative data and input from community consultation.	

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

Comments from the Federal Review Team on the Marten Falls Community Access Road Project Economic Work Plan submitted in June 2022				
ID #	**Work Plan Section**	**Guidelines Section[1]**	**Context**	**Required Action for Proponent**
	"*Lack of Disaggregated Data in 2006, 2011, and 2016 Census Results creates limitations in terms of ability to complete a comprehensive GBA+ Analysis.*"		Refer to the feedback provided in the document: "Comments from the Federal Review Team on Marten Falls Community Access Road Project Economic Study Plan – October 25, 2021", in particular comment EC-05.	
EC-WP-04	**Table 2-1:** Economic Data Gap Analysis. Sources of Secondary Information (i.e., what published data, what year, what are the data sources). **Appendix A** – Draft Economics Contact List – Page 2 - Employment Training Groups		In addition to the sources identified in the work plan, consider adding the following contacts as potential sources of secondary information and key contact interviews: • FedNor, at least for the Regional Economy and Labour Force and Employment valued components • Kiikenomaga Kikenjigewen Employment & Training Services (KKETS) is the Indigenous Skills and Employment Training Agreement Holder in that geographic area.	
EC-WP-05	**3. Discipline-Specific Schedule / Table 3-1: Program Schedule (p.16)** "Task: *Confirm MFFN and AFN Community Consultation Coordinator and their role to support in-community economic data collection (by Consultation Team). Timeline to confirm AFN coordinator may be extended depending on the communities' willingness to participate in the process.*"	**Sections 6.2 and 12**	Throughout the economic work plan, emphasis is made around the communities' willingness to participate in the data collection process/IA process. Should a community not wish to participate and/or withdraws their participation at any point in the process, clarify what would be the plan to continue sharing information and analysis with this community.	Refer to the feedback provided in the document: "Comments from the Federal Review Team on Marten Falls Community Access Road Project Economic Study Plan – October 25, 2021", in particular comment EC-14.
EC-WP-06	**Appendix A** – Draft Economics Contact List (p.19-21)	**Section 18** "…In assessing effects to valued components listed below, 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)…"	Section 7.2 of the Economic Study Plan (2021) states that *[…] the economic primary data collection program will seek to understand the diverse views and perspectives of a range of individuals including relevant identity groups such as youth, women, elders and those engaged in traditional cultural practices*". However, it is not clear how individuals identified in the current list of contacts were selected nor how it will be ensured that the individuals identified will be representative of subpopulations such as youth, women, elders and those engaged in traditional cultural practices.	Clarify in the Impact Statement how engagement through interviews and surveys of the individuals identified in the current list of contacts for the baseline data collection is representative of subpopulations. Refer to the Agency's Guidance[2]: Gender-based Analysis Plus in Impact Assessment, in particular Section 3. Gender-based Analysis Plus - Key steps.
EC-WP-07	**Appendix B** – Interview Questions (p.22-26)		To ensure that information on disproportionate impacts to subpopulations can be gathered, interview questions should be designated to seek information on how various groups may experience impacts differently.	Provide participants from subpopulations an opportunity to give feedback on the effectiveness of the survey questions in gathering information on how various groups may experience impacts differently.
EC-WP-08	**Table 2-1:** Economic Data Gap Analysis Column: Method to Address Existing Data Gap (i.e., key contacts, interview questions, survey, etc.) pages 5-7)		The work plan does not clearly describe how the existing data gaps will be addressed.	Outline clearly in the Impact Statement how existing data gaps were filled with primary data collection.
EC-WP-09	**Appendix B** – Interview Questions as well as other aspects requiring hiring of workforce.		The work plan does not clearly describe how any human resources planning would include mitigation measures to address potential skills and/or labour shortages.	Include in the Impact Statement a description of mitigation measures designed to address potential skills and/or labour shortages, as appropriate.
EC-WP-10	**Editorial**	Ensure that pdf documents submitted to the Agency contain bookmarks and have the bookmark panel active.		
EC-WP-11	**Editorial**	The term "GBA Plus" should be used instead of "GBA+". The "Plus" is no longer described by the + symbol; rather, it is spelled out to emphasize the intersectional design and approach of GBA Plus. In addition, it is recommended to avoid using the term "GBA Plus analysis" as when spelled out, it would say "Gender-based Analysis Plus analysis".		

[2] Agency's Guidance: Gender-based Analysis Plus in Impact Assessment: https://www.canada.ca/en/impact-assessment-agency/services/policy-guidance/practitioners-guide-impact-assessment-act/gender-based-analysis.html

Comments from the Federal Review Team on the Marten Falls Community Access Road Project Land and Resource Use Work Plan submitted in June 2022				
ID #	**Work Plan Section**	**Guidelines Section[1]**	**Context**	**Required Action for Proponent**
LRU-WP-01	The approach and the study areas for the Land and Resource Use Environment are defined in the Land and Resource Use Study Plan (MFFN CAR, 2021), which have been based on discussions held with both federal and provincial regulators.		Section 2 of the work plan states that the approach and study areas for the Land and Resource Use Environment are defined in the Land and Resource Use Study Plan (MFFN CAR, 2021), which have been based on discussions held with both federal and provincial regulators. As drafted, this statement gives the impression to readers that the Federal Review Team (FRT) is in agreement with the land and resource use study plan, including the definition of the study areas. This is incorrect as the FRT provided several comments on the land and resource study plan, some of which were not addressed in a satisfactory way.	Edit the work plan to remove the statements that suggests the FRT approved the land and resource use study plan, or any portion thereof, such as the study areas.
LRU-WP-02	**2. Methodology / 2.1 Secondary Data Collection and Gap Analysis / Table 2-2: Land and Resource Use Data Gap Analysis**	**Section 6.2 and 12**	Throughout Section 2 of the work plan, emphasis is made around contacts' willingness to participate in the data collection process/IA process by the Consultation Team. Should a community not wish to participate and/or withdraws their participation at any point in the process, clarify what would be the plan to continue sharing information and analysis with this community.	Refer to the feedback provided in the document: "Comments from the Federal Review Team on Marten Falls Community Access Road Project Land and Resource Use Study Plan – August 26, 2021", in particular comment LRU-09.
LRU-WP-03	**Appendix A** – Contact List	**Section 7**	It is not clear how individuals identified in the current list of contacts were selected nor how it will be ensured that the individuals identified will be representative of subpopulations such as youth, women, elders and those engaged in traditional cultural practices.	Clarify in the Impact Statement how engagement through interviews and surveys of the individuals identified in the current list of contacts for the baseline data collection is representative of subpopulations. Refer to the Agency's Guidance[2]: Gender-based Analysis Plus in Impact Assessment, in particular Section 3. Gender-based Analysis Plus - Key steps.
LRU-WP-04	**Appendix B** – Interview Questions	**Sections 5.1, 6.2, and 7**	To ensure that information on disproportionate impacts to subpopulations can be gathered, interview questions should be designated to seek information on how various groups may experience impacts differently.	Provide participants from subpopulations an opportunity to give feedback on the effectiveness of the survey questions in gathering information on how various groups may experience impacts differently.
LRU-WP-05	**Figure 2-1**	**Section 5** - Public Participation and views (including 5.1, 5.2) **Section 6** - Description of Engagement with Indigenous Groups (including 6.1, 6.2, 6.3) **Section 7** - Baseline conditions (including 7.4)	Relevant feedback provided in the past by the FRT on spatial boundaries was not taken into consideration. The Agency expects all comments provided during the study plans review be reflected in the Impact Statement.	Refer to the feedback provided in the document: "Comments from the Federal Review Team on Marten Falls Community Access Road Project Land and Resource Use Study Plan – August 26, 2021", in particular comment GC-01, GC-02 and GC-04.
LRU-WP-06	**Table 2-1: Land and Resource Use Study Areas; Extraction Industry and Energy and Linear Infrastructure; RSA** "The Economic RSA with the exception of the Province of Ontario, which includes the unorganized regional districts of: Cochrane, Thunder Bay and Kenora."		The description of the RSA "The Economic RSA with the exception of the Province of Ontario, which includes the unorganized regional districts of: Cochrane, Thunder Bay and Kenora" is unclear. In particular, is unclear how the "province of Ontario" can be excluded in the RSA	Edit Table 2-1 of the work plan to provide a clear description of the RSA for the "Extraction Industry".

Comments from the Federal Review Team on the Marten Falls Community Access Road Project Land and Resource Use Work Plan submitted in June 2022				
ID #	**Work Plan Section**	**Guidelines Section[1]**	**Context**	**Required Action for Proponent**
LRU-WP-07	**Table 2-2: Land and Resource Use Data Gap Analysis; Land Use Compatibility; Key contact interviews.**	**Sections 5, 6, and 7.4**	All Indigenous communities listed in the Indigenous Engagement and Partnership Plan and members of the public listed in the Public Participation Plan for the Project must be offered an opportunity to participate in the Land and Resource Use survey. Limiting the interviews to Indigenous communities and members of the public located within the Local Study Area defined by the Proponent would not be deemed sufficient to meet the requirements of the Guidelines.	Refer to the feedback provided in the document: “Comments from the Federal Review Team on Marten Falls Community Access Road Project Land and Resource Use Study Plan – August 26, 2021”, in particular comment GC-01, GC-02, GC-04 and LRU-05.
LRU-WP-08	**Editorial**	Ensure that pdf documents submitted to the Agency contain bookmarks and have the bookmark panel active.		
LRU-WP-09	**Editorial**	The term “GBA Plus” should be used instead of “GBA+”. The “Plus” is no longer described by the + symbol, rather, it is spelled out to emphasize the intersectional design and approach of GBA Plus. In addition, it is recommended to avoid using the term “GBA Plus analysis” as when spelled it out, it would say “Gender-based Analysis Plus analysis”.		