

Appendix C5

Feedback and Response Log - Indigenous Communities – Fort Albany First Nation



Table: Summary of Feedback Received and Response / Action – Fort Albany First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
Fort Albany First Nation	1	<p>The Draft EA/IS proposes general Indigenous involvement in future monitoring and decision-making but does not outline, define, or resource a specific role for Indigenous Nations in long-term project governance. This generalized approach falls short of meaningful consultation and accommodation standards, and it fails to align with best practices for Indigenous participation in project oversight and environmental stewardship, particularly in a culturally and ecologically sensitive region. It also fails to explain how Indigenous Knowledge systems will be integrated into monitoring design, evaluation criteria, or adaptive decision-making.</p> <p>Please revise the EA/IS to include the following:</p> <ol style="list-style-type: none"> 1. A commitment to the co-development of a project oversight and monitoring body with guaranteed participation for impacted Indigenous Nations. 2. Funding and support for Indigenous-led monitoring programs, including Guardian initiatives and community-based monitoring. 3. Formal decision-making input for Indigenous Nations throughout the life of the project. 4. A clear description of how Indigenous 	<ol style="list-style-type: none"> 1. We acknowledge Fort Albany First Nation's request to co-develop a project oversight and monitoring body with guaranteed participating for impacted Indigenous Nations. <p>Marten Falls First Nation continues to have discussions with the Province regarding ownership and operations of the Community Access Road. These conversations are ongoing, and consultation with Indigenous communities will continue in 2026 under the coordination of the regulator.</p> <ol style="list-style-type: none"> 2. As noted in Fort Albany First Nation's Aboriginal and/or Treaty Rights and Interests: Draft Impact Assessment Report, proposed mitigation measures include the collaboration with local existing environmental advisory committees to support the development and implementation of all environmental monitoring programs. The objective is to include Indigenous interests and perspectives, particularly concerning resources utilized for rights-based purposes. In the absence of an existing advisory committee with an aligned mandate to Marten Falls First Nation, a Terms of Reference between relevant agencies and Fort Albany First Nation will 	Comment noted; see response for details	111

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		<p>Knowledge will inform monitoring approaches, thresholds, and indicators.</p>	<p>be established.</p> <p>3. We acknowledge Fort Albany First Nation's request for formal decision-making input for Indigenous Nations throughout the life of the Community Access Road. Refer to Response 1.</p> <p>4. We acknowledge Fort Albany First Nation's request for a clear description of how Indigenous Knowledge will inform monitoring approaches, thresholds, and indicators. Refer to Response 2.</p>		
Fort Albany First Nation	2	<p>The Draft EA/IS does not provide predictive hydrological modeling or analysis of changes to ice formation, freeze-thaw timing, or ice-jam related flooding risks in the Albany River system. This is a significant omission because freeze-thaw cycles and ice formation processes are critical to river dynamics, ecological health, and flood risk management. Understanding how the project may affect these processes, especially in the context of changing climate conditions, particularly under future climate change scenarios, is necessary to assess potential impacts on aquatic systems, infrastructure, and Indigenous land use.</p>	<p>1. The main body of the Final EA/IS is intentionally written in plain language to make it accessible to a broader audience, while the technical details are provided in the appendices for those who wish to review them in depth. Section 12 in the Final EA/IS is a high-level summary of the climate change risk assessment in Appendix Y Climate Adaptation and Resiliency Technical Support Document. In addition, land cover changes due to the Community Access Road within local watershed were assessed and discussed in Section 7.3.2.5 of Appendix F Surface Water Technical Support Document.</p> <p>2. Permanent changes (based on worst</p>	<p>Comment noted; see response for details</p>	112

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		<p>Please revise the EA/IS to include the following:</p> <ol style="list-style-type: none"> 1. Predictive hydrological modeling or analysis of potential changes to ice formation, freeze-thaw cycles, and the risk of seasonal flooding along the Albany River system. 2. An assessment of these risks under both current and projected future climate scenarios. 	<p>case scenario) at selected assessment points were estimated for large watersheds (0.07% to 0.17% with mean of 0.1%), medium watersheds (0.37% to 1.77% with mean of 0.7%) and small watersheds (0.32% to 4.22% with mean of 2.35%). Considering that the changes are within 5%, impacts to surface water were anticipated to be negligible.</p> <p>Road construction and water crossings are not expected to change the thermal regime of the waterbodies and the freeze thaw cycle will not be impacted as the water level and flows will not change under normal conditions. Under high water events, water levels upstream of the water crossings may increase slightly, however these will be short lived and will recede on a timeline similar to natural conditions.</p> <p>Therefore, additional hydrological modeling or analysis of changes to ice formation, freeze-thaw timing, or ice-jam related flooding risks in the Albany River system is not deemed necessary.</p>		
Fort Albany First Nation	3	The current defined study areas do not adequately reflect the extent of potential downstream and cumulative impact, particularly along the Albany River	1. The Regional Study Area as indicated in the Surface Water Study Plan (2021) was originally selected based on scale of quaternary watersheds crossed by the	Comment noted; see response for details	113

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		<p>system. For a project of this scale one that fundamentally alters access, hydrology, and ecosystem dynamics - a broader special scope is required to understand long range ecological and cultural consequences.</p> <p>Please revise the EAIS to:</p> <ol style="list-style-type: none"> 1. extend the regional study area to include downstream zones of influence, including the Albany River and coastal ecosystem leading into James Bay. 2. Integrate Indigenous Knowledge and land use mapping to identify areas of cultural and ecological significance beyond the current study boundary. 3. Re-evaluate potential project effects using this expanded spatial lens to ensure that downstream communities and ecosystems are meaningfully assessed. 	<p>Local Study Area. These watershed areas represent fourth-level subdivisions in Canada’s drainage framework and are considered suitable for assessing broader environmental impacts where indirect effects of the project are likely to occur. The Regional Study Area was subsequently increased to a tertiary watershed scale, which includes a larger area to assess potential project effects. Increasing the regional scale of this study area to a secondary or primary watershed scale may limited the identification of potential effects.</p> <p>2. Available Indigenous Knowledge and associated land use mapping have been utilized to identify areas of cultural and ecological significance beyond the current study boundary.</p> <p>3. Based on the responses provided in responses 1 and 2, the assessment completed to date will remain as currently presented in the Final EA/IS.</p>		
Fort Albany First Nation	30	The Draft EA/IS acknowledges historical mercury contamination in the Albany river system but it fails to assess the potential for mercury mobilization resulting from sediment disturbance, dewatering, or hydrological changes associated with	1. Mercury concentrations observed during the Aquatics Field program completed between 2019 and 2022, specifically undertaken to assess surface water quality, were collected to understand baseline conditions of	Comment noted; see response for details	114

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		<p>road development. This omission is especially concerning given the potential health and ecological impacts for downstream Indigenous communities that rely on aquatic ecosystems for harvesting and subsistence.</p> <p>Please revise the EA/IS to include the following:</p> <ol style="list-style-type: none"> 1. A site specific risk assessment evaluating the potential for mercury mobilization during construction and operation, particularly in areas with known or suspected contaminated sediments. 2. Mitigation measures to minimize sediment disruption in mercury-sensitive areas. 3. Monitoring protocols and contingency measures to prevent downstream mercury contamination, protect aquatic health, and ensure the safety of Indigenous harvesting practices. 4. Integration of Indigenous Knowledge and historical community observations regarding mercury impacts and vulnerable sites. 	<p>surface water features that will be potentially crossed by project components. The results that were observed at select locations cannot be inferred to as caused by natural or anthropogenic sources. Recent scientific literature suggests that mercury concentrations, regardless of increases or decreases in concentration, within the general northern Ontario region may stem from atmospheric depositions, anthropomorphic and/or climate change sources. That said, the dynamics of these sources is beyond the scope of the baseline study of existing conditions within the project area. The residual and cumulative effects sections of the surface water report identify best practices to mitigate and/or eliminate potential sources that may be caused by the Community Access Road.</p> <p>2. Refer to response 1.</p> <p>3. Monitoring program during construction includes monitoring of water quality parameters of concern, as required, to satisfy the conditions and/or requirements of applicable permits and approvals, and to confirm the effectiveness mitigation and enhancement measures. This will include</p>		

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			<p>monitoring of mercury either directly or using suspended solids as a proxy indicator. That said, no significant flooding or flow regime change is expected as a result of the water crossings.</p> <p>4. As noted in 1, the aquatics field program was completed between 2019 and 2022. During planning of this program, all available Indigenous Knowledge was reviewed and considered.</p> <p>With the Final EA/IS being released in February 2026, no further fieldwork is planned. However, Indigenous Knowledge will continue to be considered during the detail design phase.</p>		
Fort Albany First Nation	5	Section 8.3.6.4 off the Draft EA/IS states that no barriers to fish movement were observed at survey crossings. However, the report does not adequately assess the long term risk to fish migration posed by the installation of culverts, bridges, and other water crossings - particularly under changing seasonal flow conditions due to climate change variability and road maintenance activities. Without robust predictive analysis, the project risks fragmentation of aquatic habitats	1. At the EA/IS stage of the Community Access Road, a detailed fish passage assessment for each fish-bearing crossing cannot be completed. The Community Access Road is at a preliminary design stage. During the detail design stage, the bridge and culvert designs for each crossing will be developed, including the hydraulic modelling and design criteria. Similarly, as described in Section 7.3.1.1.2 of Appendix G (Fish and Fish Habitat),	Comment noted; see response for details	115

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		<p>essential to the life cycles of migratory and resident fish species.</p> <p>Please revise the EA/IS to include the following:</p> <ol style="list-style-type: none"> 1. Detailed assessment of fish passage for each proposed crossing, including site specific hydraulic modeling and design criteria. 2. Commitment to infrastructure standards that ensure year-round habitat connectivity under both low-flow and high-flow conditions. 3. Monitoring and maintenance protocols to ensure crossing structures do not become migration barriers overtime. 	<p>during detail design, site-specific fish and fish habitat and surface water surveys will be completed to support engineering and Fisheries and Oceans Canada and the Ministry of Natural Resources permitting at waterbody crossings where work below the high-water mark is proposed. Designs of waterbody crossings will be submitted as required in Fisheries and Oceans Canada and Ministry of Natural Resources permit applications.</p> <p>2. As indicated in Section 7.3.1.6.2 of Appendix G Fish and Fish Habitat Technical Support Document, where a channel allows for fish passage, culverts will be designed and installed in fish-bearing waterbodies to allow for fish passage to meet Fisheries and Oceans Canada fish passage guidelines. The fish passage requirements for each proposed crossing will be determined during detail design and will consider low flow and high flow conditions. This information will be provided in the Fisheries and Oceans Canada and Ministry of Natural Resources permit applications.</p> <p>3. Monitoring and maintenance will involve the following (Section 7.3.1.1.2 Appendix G):</p>		

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			<ul style="list-style-type: none"> • Regularly inspecting and maintaining culverts and bridges to prevent blockages from forming and causing ponding or backwater effects. Where culverts and bridges are installed at fish bearing waterbodies, Fisheries and Oceans Canada’s Codes of Practice will be followed for debris removal activities (i.e., gradual removal such that flooding downstream, extreme flows downstream, release of suspended sediment, and fish stranding can be avoided) (DFO, 2025); and • Operating waterbody crossing structures in consideration of best management practices and environmental approval conditions, including the Ministry of Natural Resources Environmental Guidelines for Access Roads and Water Crossings (MNRF, 1990) and Fisheries and Oceans Canada’s Measures to Protect Fish and Fish Habitat (DFO, 2025). 		
Fort Albany First Nation	6	The Draft EA/IS does not sufficiently evaluate how road construction and operations may alter key water quality parameters-such as water temperature, dissolved oxygen, and sedimentation - that are critical to fish health and habitat suitability. These parameters are particularly sensitive during spawning	1. Predictive water quality modelling was not completed for the Community Access Road based on the types of effects expected to occur from a linear development project such as a road. This aligns with the Surface Water Study Plan (AECOM, 2021) where it indicates that “Qualitative methods will be used to	Comment noted; see response for details	116

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		<p>and overwintering periods.</p> <p>Please revise the EA/IS to include the following:</p> <ol style="list-style-type: none"> 1. Predictive modeling of changes to water temperature, dissolved oxygen levels, and sedimentation in impacted tributaries and mainstream rivers. 2. A seasonal analysis to assess risk during biologically sensitive periods. 3. Mitigation strategies and long-term monitoring to safeguard water quality in fish-bearing waters. 	<p>assess potential effects of the Project to surface water quality based on an understanding of baseline surface water quality, likely parameters / contaminants of potential concern associated with different Project activities, and consideration of mitigation measures inherent to the Project design”.</p> <p>2. A separate seasonal analysis is not required because risk during biologically sensitive periods is addressed through mitigation measures, specifically adherence to provincial restricted activity timing windows.</p> <p>Restricted activity timing windows established by the Ministry of Natural Resources and Forestry protect fish during critical life stages such as spawning, egg incubation, and fry emergence. In the Northwest Region, spring windows cover spring-spawning migrations and incubation/emergence, while fall windows extend from fall-spawning migrations through egg emergence the following spring.</p> <p>To mitigate risk during biologically sensitive periods, construction during a fish and fish habitat restricted activity timing window will be avoided, where</p>		

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			<p>feasible (Section 7.3.1.1.2 of Appendix G Fish and Fish Habitat Technical Support Document). Work may not be conducted during the proposed restricted activity timing window unless approval is obtained from the Ministry of Natural Resources and Fisheries and Oceans Canada. The restricted activity timing windows for each waterbody crossing will be finalized by the Ministry of Natural Resources during permitting.</p> <p>3. Mitigation measures to avoid or minimize the negative effects to water quality are outlined in the surface water quality assessment; see Table 7-5 in Section 7.3.1.12 of Appendix F Surface Water Technical Support Document for a summary of mitigation and enhancement measures, as well as Section 9.3-4 of the Final EA/IS.</p> <p>Monitoring for water quality is outlined in Section 9 of Appendix F, as well as Section 14 of the Final EA/IS. Furthermore, as indicated in Section 9.2 of Appendix G, turbidity and total suspended solids will be monitored according to Fisheries and Oceans Canada and the Ministry of Natural Resources permit requirements and will follow the Canadian Council of Ministers</p>		

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			of the Environment's Canadian Water Quality Guidelines for the Protection of Aquatic Life (CCME, 1999).		
Fort Albany First Nation	7	<p>While the Draft EA/IS and Appendix K include a detailed assessment of Caribou in the Missisa range, the report concludes that the project will not result in significant adverse effects for moose. As a result, it does not provide the same level of detailed analysis for moose habitat connectivity, movement corridors, or migratory behaviors. This omission overlooks the potential for road infrastructure to disrupt moose movement patterns, which may have both ecological and harvesting implications.</p> <p>Please revise the EA/IS to include following:</p> <ol style="list-style-type: none"> 1. A comprehensive analysis of moose movements corridors in the study area. 2. Predictive assessment of potential barrier effects from road construction and operation. 3. Identification of habitat fragmentation risks and recommended mitigations to preserve movements and access 	<p>1. Requirements outlined in the federal Tailored Impact Statement Guidelines and provincial Terms of Reference for the Community Access Road were used to guide the quantitative and qualitative analyses conducted for the Final EA/IS. Moose habitat suitability and arrangement (connectivity) and predicted winter occupancy were modelled to characterize the existing availability of habitat, and potential impacts to habitat availability and distribution and survival and reproduction with the addition of the Community Access Road and other reasonably foreseeable developments. Data from winter aerial surveys and remote camera monitoring conducted for the Community Access Road were combined with literature and provincially available data (e.g., Significant Wildlife Habitat, hunting records). GPS collars had not been deployed on moose in the study areas, which limited the ability to conduct the same detailed analysis about movement patterns that was completed for caribou.</p> <p>2. Potential effects that could result in</p>	Comment noted; see response for details	117

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			<p>changes in moose movement (i.e., linear barriers), an increase in habitat fragmentation (i.e., habitat alteration) and a decrease in habitat connectivity (i.e., linear barriers, habitat loss, habitat alteration) were identified and assessed for construction and operation of the Community Access Road. Mitigations were described to avoid and minimize effects. Potential effects are described in Table 9.4-14 of the Final EA/IS (formerly Table 9-27 of the Draft EA/IS) and in more detail in Appendix M Ungulates Technical Support Document.</p> <p>3. Refer to response 2</p>		
Fort Albany First Nation	8	<p>The Draft EA/IS acknowledges that the new access road may increase hunting pressure and human activity, but it does not assist the population-level effects or propose specific mechanisms for regulating increased access. Please revise the EA/IS to include the following:</p> <ol style="list-style-type: none"> 1. Risk assessment of increased hunting and poaching pressure due to new road access. 2. Concrete regulatory and enforcement measures to manage access and harvesting activities. 3. Commitment to co-develop culturally 	<ol style="list-style-type: none"> 1. The Traditional Foods assessed the potential impacts from increased hunting pressure, resulting in a potential decrease in available traditional foods for harvesting. The analysis has been updated to reflect this population-level effect for all local and regional communities which are known to harvest traditional foods in this area. To add greater clarity, Accessibility to Traditional Food areas and Availability of Traditional Foods have been separated into two distinct Indicators. 2. Regarding access to the Community 	Comment noted; see response for details	118

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		<p>appropriate access protocols and enforcement mechanisms in collaboration with Fort Albany First Nation.</p>	<p>Access Road, Marten Falls First Nation continues to engage in discussions with the Province regarding the ownership and future operations of the road. Therefore, at this stage, Marten Falls First Nation is not in a position to commit to restricting access to the road. This matter will require further dialogue between Indigenous Communities and the province.</p> <p>3. Fort Albany First Nation's request for to co-develop culturally appropriate access protocols and enforcement mechanisms is noted. Marten Falls First Nation continues to have discussions with the Province regarding ownership and operations of the Community Access Road. These conversations are ongoing, and consultation with Indigenous communities will continue in 2026 under the coordination of the regulator.</p>		
Fort Albany First Nation	9	<p>Peatlands are vital ecosystems that store carbon, regulate water flow, and hold deep cultural significance for indigenous communities through their connection to traditional harvesting and land-based practices. The Draft EA/IS indicates that peatlands may be damaged by changes in surface water flow or melting permafrost resulting from road</p>	<p>1. As documented in Appendix I Peatlands Technical Support Document, it was determined that there is a high uncertainty surrounding two residual effects to peatlands (i.e., effects of changes to groundwater quantity and groundwater flow). Additional studies have been recommended to occur during detail design, including a groundwater</p>	Appendix I	119

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>construction and related disturbances. However, it does not include detailed, location specific studies or predictive modeling to assess where and how peatland degradation may occur. Moreover, the report does not define clear ecological thresholds to identify when peatland degradation is becoming serious or reversible.</p> <p>Please revise the EA/IS to include the following:</p> <ol style="list-style-type: none"> 1. specially explicit assessment of peatland vulnerability, including hydrological and thermal modeling to identify high-risk areas for degradation from drainage, thaw, or terminal disturbance. 2. Integration of climate change scenarios into peatland resilience modeling to support proactive design and mitigation. 3. Formal commitment to engage Fort Albany First Nation in the identification, classification, and protection of sensitive peatland areas using Indigenous Knowledge and stewardship protocols. 4. Clear thresholds or indicators of peatland degradation, and mitigation and adaptive response plan to prevent long term damage or carbon release 5. Quantification of peatland carbon 	<p>monitoring program and water budget study. With the improved understanding of peatland hydrology and hydrogeology gained through future studies, and a refined road design as detail design progresses, the uncertainty associated with the two residual effects with high uncertainty will be reduced.</p> <p>2. The Final EA/IS and the Technical Support Documents were prepared to meet the requirements outlined in the Terms of Reference, the Tailored Impact Statement Guidelines and the technical discipline-specific study plans. We acknowledge Fort Albany First Nation's request to integrate climate change scenarios into peatland resilience modeling; however it is outside of the scope and as such was not developed as part of the Final EA/IS.</p> <p>3. Marten Falls First Nation is committed to continuing to engage and consult with Indigenous communities throughout the process. As part of these efforts, the identification and protection of sensitive peatland areas have considered available Indigenous Knowledge. Should the Final EA/IS for the Community Access Road be approved to proceed, a consultation and engagement program</p>		

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		<p>storage and inclusion in the cumulative effects analysis, particularly in relation to long-term climate change impacts.</p>	<p>will be established to guide discussions through detail design, including with Fort Albany First Nation.</p> <p>4. The future monitoring program outlined in Section 9 of Appendix I have been revised to clarify that the program will include science-based thresholds or indicators of peatland degradation based on research and established standards, as well as mitigation and adaptive response plan to prevent long term damage or carbon release.</p> <p>5. An assessment of peatland carbon storage is provided in Attachment C to Appendix I. The residual effects were assessed based on the results presented in Attachment C, but not carried forward to the cumulative effects assessment as the predicted effect was determined to be negligible.</p>		
Fort Albany First Nation	10	<p>The Draft EA/IS acknowledges that the construction of a new access road may increase risks related to drug and alcohol availability, human trafficking, and social disruption. These risks are not isolated to individual harm-they have broader community wide impacts on safety, mental health and cultural cohesion. Indigenous women and youth are</p>	<p>1. The development and implementation of a Safety and Wellness Plan will be the responsibility of the owner/operator of the Community Access Road. Marten Falls First Nation continues to have discussions with the Province regarding the ownership and operations for the Community Access Road.</p>	<p>Comment noted; see response for details</p>	120

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		<p>particular vulnerable to these effects, which can erode community trust, strain support services, and disrupt intergenerational relationship. However, the Draft EA/IS does not explain how these risks will be tracked over time or how affected communities will be protected if social harms intensify. The lack of a long-term prevention, response, and support strategy is a significant gap in the assessment.</p> <p>Please revise the EA/IS to include the following:</p> <ol style="list-style-type: none"> 1. Co-developed Safety and Wellness plan with affected Indigenous Nations and neighboring communities that includes culturally relevant prevention, support services, and response protocols. 2. Community-led monitoring of social harms with indicators developed in partnership with Indigenous leaders and health experts. 	<p>2. As noted in Fort Albany First Nation's Aboriginal and/or Treaty Rights and Interests: Draft Impact Assessment Report, proposed mitigation measures include the collaboration with local existing environmental advisory committees to support the development and implementation of all environmental monitoring programs. The objective is to include Indigenous interests and perspectives, particularly concerning resources utilized for rights-based purposes. In the absence of an existing advisory committee with an aligned mandate to Marten Falls First Nation, a Terms of Reference between relevant agencies and Fort Albany First Nation will be established.</p>		
Fort Albany First Nation	11	<p>The Draft EA/IS includes that greater road access could lead to decline in traditional food harvesting and an increase in overharvesting due to easier access to hunting and fishing areas. These changes could significantly disturb cultural transmission between Elders and</p>	<p>1. The Final EA/IS and the Technical Support Documents were prepared to meet the requirements outlined in the Terms of Reference, the Tailored Impact Statement Guidelines and the technical discipline-specific study plans. Commitments to support community-</p>	Comment noted; see response for details	122

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		<p>youth and contribute to the erosion of food sovereignty. Maintaining traditional harvesting is essential not only for food security, but also for cultural continuity, knowledge transfer, and the integration of Indigenous values and practices in land stewardship.</p> <p>Please revise the EA/IS to include the following:</p> <ol style="list-style-type: none"> 1. Commitment to support community-based harvesting and food security programs that strengthen traditional food systems, not just rely on imported food options. 2. Formal support and funding for Indigenous-lead harvesting initiatives. 	<p>based harvesting and food security programs are not a regulatory requirement and as such were not developed as part of the Final EA/IS.</p> <p>2. Formal support and funding for Indigenous-led harvesting initiatives fall within the responsibilities of the future owner and operator of the Community Access Road. Marten Falls First Nation continues to have discussions with the Province regarding the ownership and operations for the Community Access Road.</p>		
Fort Albany First Nation	12	<p>The Draft EA/IS briefly acknowledges potential psychological impacts- such as loss of sense of place, mental health risks, and intergenerational cultural disruption - but does not meaningfully assess them. These effects are deeply tied to community identity, resilience, and long-term well-being. Psychological harms can manifest as increased anxiety, disconnection from land-based practices, and erosion of cultural continuity.</p> <p>Please revise EA/IS to include a substantive assessment of cumulative</p>	<p>1. While cumulative psychosocial effects are inherently complex to measure, the Final EA/IS has considered both direct and indirect pathways through which environmental and cultural disruption may influence mental health and cultural identity over time. The Community Well-Being assessment has also been updated to address cultural preservation and change, as well as mental health under the Community and Public Health Valued Component. For further detail, please refer to Appendix T (Community Well-Being).</p>	Comment noted; see response for details	123

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		<p>psychosocial effects, including:</p> <ol style="list-style-type: none"> 1. Long term mental health impacts of environmental and cultural disruption. 2. Risks to cultural continuity and identity, especially for youth. 3. Mitigation measures such as land based healing initiatives mental health supports, and cultural programming co-designed with Fort Albany First Nation 	<ol style="list-style-type: none"> 2. Refer to response 1. 3. With respect to Fort Albany First Nation, the EA/IS does not identify a pathway of direct effects between the Community Access Road and the community. As such, direct mitigation measures, such as co-designed mental health or cultural healing programs, are not within the scope of the Final EA/IS. 		
Fort Albany First Nation	13	<p>The Draft EA/IS References sacred and burial sites but does not clearly explain how these will be protected during or after construction. Sacred sites are essential to cultural survival and are protected under both Indigenous law and Canadian heritage legislation. Their desecration can cause intergenerational trauma and erode Spiritual and cultural identity.</p> <p>Please revise the EA/IS to include a clear commitment to protect sacred and burial sites, including the designation of no-go zones and protocols for community notification and consent prior to any work near sensitive areas.</p>	<p>We acknowledge Fort Albany First Nation’s request for commitments to protect sacred and burial sites. As outlined in Appendix AA Summary and Recommendations, these commitments will be addressed through a Cultural Heritage Evaluation Report (CHER). A CHER will be prepared by a Qualified Person(s). In completing the evaluation, available Indigenous Knowledge will be considered, and Indigenous communities will be provided the opportunity to review the report.</p> <p>If the Cultural Heritage Evaluation Report determines that the subject area meets the criteria under Ontario Regulation 9/06 or Ontario Regulation 10/06, and the Community Access Road will continue to impact the area, a Heritage Impact</p>	Comment noted; see response for details	124

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			<p>Assessment will be undertaken to assess potential impacts and recommend appropriate mitigation measures.</p> <p>A Cultural Heritage Evaluation Report will be completed during the detail design phase of the Community Access Road.</p>		
Fort Albany First Nation	14	<p>The Draft EA/IS includes monitoring and adapting but does not explain how affected Indigenous Nations can participate in real time monitoring or what role the community would play. Legacy impacts from historical hydroelectric and resource development have degraded baseline conditions, making community-led oversight essential to restore and safeguard Indigenous lands.</p> <p>Please revise the EA/IS to include clear mechanisms for Indigenous Nations to participate in real time monitoring, enforcement come up and adaptive management decisions, particularly through on the ground roles.</p>	<p>As noted in Fort Albany First Nation's Aboriginal and/or Treaty Rights and Interests: Draft Impact Assessment Report, proposed mitigation measures include the collaboration with local existing environmental advisory committees to support the development and implementation of all environmental monitoring programs. The objective is to include Indigenous interests and perspectives, particularly concerning resources utilized for rights-based purposes. In the absence of an existing advisory committee with an aligned mandate to Marten Falls First Nation, a Terms of Reference between relevant agencies and For Albany First Nation will be established.</p>	Comment noted; see response for details	126
Fort Albany First Nation	15	<p>The Draft EA/IS does not explain what thresholds would trigger stronger protection or adaptive actions. Clearly defined thresholds are critical to ensure automatic responses when harm occurs,</p>	<p>The Final EA/IS includes an Adaptive Management Plan as a mitigation measure; however, the specific indicators, thresholds, and triggers requested cannot be defined at this</p>	Comment noted; see response for details	127

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		<p>helping to prevent irreversible damage to lands, water and cultural values.</p> <p>Please revise the EA/IS to include clearly defined indicators and thresholds that would automatically trigger operational changes or the implementation of additional safeguards when environmental or cultural impacts are observed.</p> <p>These thresholds should be co-developed with Indigenous communities and include Indigenous Knowledge indicators.</p>	<p>stage of the Community Access Road. The development and implementation of the Adaptive Management Plan will be the responsibility of the owner/operator of the Community Access Road. Marten Falls First Nation continues to have discussions with the Province regarding the ownership and operations for the Community Access Road.</p>		
Fort Albany First Nation	16	<p>The Draft EA/IS does not assess what may happen if other mines-particularly those in the Ring of Fire- or new roads are developed in the region. Failing to consider foreseeable developments overlooks the cumulative landscape-scale pressure that could drastically alter ecosystems, increase access, and undermines Indigenous rights and territory stewardship.</p> <p>Please revise the EA/IS to include a scenario-based cumulative effects assessment that incorporates foreseeable projects such as other Ring of Fire mines, and access roads, and evaluates their combined impact with the</p>	<p>Activities were included in the Project Inclusions List if they overlapped spatially and temporally with the local and regional study areas for the valued components carried forward from the regional effects assessment, and if publicly available information was accessible online at the time the cumulative effects assessment was conducted. The Project Team reviewed your comments, and relevant projects and activities were incorporated into the Project Inclusions List in the Final EA/IS.</p>	Final EA/IS Table 10-1 Appendix E	128

Table: Summary of Feedback Received and Response / Action – Fort Albany First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Marten Falls Community Access Road.			
Fort Albany First Nation	17	<p>The Draft EA/IS excludes key foreseeable Ring of Fire mining projects from its cumulative effects assessment. Table 10-1 omits major mining projects- such as the Blackbird, Big Daddy, Black Label, and Black Thor mines- despite their public identification by mining companies. The rationale provided that- these are “deposits and not active projects” - fails to reflect their "reasonably foreseeable" status, as defined by Indigenous knowledge holders and planning standards. This exclusion represents a serious flaw in the scoping of cumulative effects and illustrates the broader issue of project splitting. By artificially narrowing the scope of analysis, the EA/IS fails to account for the full impact of opening the Ring of Fire and adjacent James Bay Lowlands to industrial development.</p> <p>Please revise the EA/IS to retain these mining projects in the cumulative effects assessment, in accordance with regulatory guidelines on "reasonably foreseeable" developments.</p>	<p>Blackbird, Big Daddy, Black Label, and Black Thor mines were considered as part of the Cumulative Effects Assessment, where spatial and temporal overlap with the local and regional study areas was evaluated for each valued component carried forward from the Regional Effects Assessment.</p> <p>Where publicly available information existed at the time of the assessment, it was incorporated from online sources. Based on this evaluation, the mines are not anticipated to have spatial or temporal overlap with the valued components carried forward from the Regional Effects Assessment. Therefore, they have been screened out of the Cumulative Effects Assessment.</p>	Comment noted; see response for details.	130
Fort Albany First Nation	18	The Draft EA/IS does not adequately assess the environmental and cultural	Aggregate sourcing, construction material management, and associated	Comment noted; see	131

Table: Summary of Feedback Received and Response / Action – Fort Albany First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>impacts of aggregate extraction and construction waste management, despite identifying over 40 potential aggregate and borrow sites. These activities, involving drilling, blasting, crushing, dewatering, and stockpiling of materials, are expected to operate throughout the construction and operational phases of the road. Associated infrastructure, including concrete batch plants, access roads to pits, and waste disposal areas, is not fully scoped into the effects analysis.</p> <p>These activities may also result in noise, light, and chemical pollution that affects Indigenous harvesting practices and local ecosystems.</p> <p>This omission is unacceptable given the scale, intensity, and duration of aggregate extraction operations.</p> <p>Please revise the EA/IS to include all aggregate-related facilities, dewatering activities, and construction waste infrastructure in the cumulative effects analysis. A full assessment of long-term impacts, ecological thresholds, and mitigation plans is required, particularly for sensitive peatland and surface water areas.</p>	<p>infrastructure are recognized as important considerations in understanding potential environmental and cultural effects. As part of the effects assessment, Project activities were reviewed to identify potential project–environment interactions, and these interactions were evaluated for their potential to result in effects. This analysis is presented in Section 9 of the Final EA/IS, where each discipline outlines the relevant pathways of interaction and associated mitigation measures.</p> <p>More detailed construction information—such as the final locations and operating requirements for concrete batch plants, dewatering systems, and construction waste management areas—will be further developed during the detail design phase.</p> <p>In addition, the Fort Albany Aboriginal and/or Treaty Rights and Interests Report, received on June 13, 2025, provides further discussion of how the Project may affect Fort Albany First Nation’s rights and interests. The findings of that report inform the understanding of potential interactions between Project activities, including aggregate-related components, and Indigenous land use</p>	<p>response for details</p>	

Table: Summary of Feedback Received and Response / Action – Fort Albany First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
			and cultural practices.		
Fort Albany First Nation	19	<p>The Draft EA/IS acknowledges past hydroelectric and forestry development, but it does not assess their ongoing ecological and cultural impacts. Legacy impacts matter because they compound new pressures and shape the degraded environmental and cultural baselines against which current project impacts should be measured.</p> <p>Please revise the EA/IS to include an analysis of legacy hydroelectric and forestry development impacts as part of the cumulative effects framework.</p>	<p>Hydroelectric and forestry development projects with information on their location that were publicly available at the time of preparation of the Project Inclusions List, were included. For example the Little Jackfish River Hydroelectric Project, Water control Structures along the Albany River Watershed and Ogoki Forest Management Plans are included on the Project Inclusions List (Table 10.1-1 in the Final EA/IS) and are considered as part of the disciplines cumulative effects assessments.</p>	Final EA/IS Table 10-1	132
Fort Albany First Nation	20	<p>The Draft EA/IS does not consider how the road may induce new development - such as additional mining, logging, or increased recreational access - beyond its immediate footprint. Assessing induced development is critical because it can accelerate land-use change and contribute to cumulative cultural loss, habitat fragmentation, and long-term environmental degradation.</p> <p>Please revise the EA/IS to include an assessment of potential induced development scenarios resulting from improved access, and their implications</p>	<p>The Environmental Assessment / Impact Statement and the Technical Support Documents were prepared to meet the requirements outlined in the Terms of Reference, the Tailored Impact Statement Guidelines and the technical discipline-specific study plans. Inclusion of projects in the cumulative effects assessment (CEA) that do not meet the criteria of reasonably foreseeable is not a regulatory requirement and as such was not developed as part of the Environmental Assessment / Impact Statement. For a project to be considered reasonably foreseeable,</p>		133

Table: Summary of Feedback Received and Response / Action – Fort Albany First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>for environmental and cultural sustainability.</p>	<p>sufficient information about the activity must have been available to make a reasonable assessment of its potential effects (i.e., in the planning / approvals / design stage).</p> <p>Potential future developments resulting from the Community Access Road was not included as part of the Project Inclusions List, as there is not adequate information available to determine the potential cumulative effects from potential new developments, and therefore cannot be considered reasonably foreseeable. Only projects with information on their location and timing publicly available at the time of preparation of the Project Inclusions List, were included. Refer to Table 10.1-1 in the Final EA/IS for the complete Project Inclusions List.</p>		
Fort Albany First Nation	21	<p>The cumulative effects assessment is conducted in isolation and is not integrated into any broader regional planning or strategic assessment framework. Without the regional lens, the assessment fails to account for the interconnectedness of development pressures. A broader approach ensures consistent standards, cross-jurisdictional planning, and holistic protection of</p>	<p>We have carefully considered the TISG in development of the EA/IS, including the assessment of cumulative effects. As outlined in Section 10 of the Final EA/IS, "The Impact Assessment Act (Government of Canada, 2017a) requires that each Impact Statement of a project take into account any cumulative environmental effects that are likely to result from the project in combination</p>	<p>Comment noted; see response for details</p>	134

Table: Summary of Feedback Received and Response / Action – Fort Albany First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>Indigenous rights and ecosystems.</p> <p>Please revise the EA/IS to include the cumulative effect assessment within an established or emerging regional strategic assessment framework, such as the Ring of Fire Regional Assessment.</p>	<p>with the environmental effects of other physical activities that have been or will be carried out." In alignment with this requirement, the cumulative effects assessment was prepared in accordance with the Terms of Reference Notice of Approval for the Community Access Road.</p> <p>The Project Inclusions List (Table 10.1-1 of the Final EA/IS) identifies projects and activities with spatial or temporal overlap with the Community Access Road, based on publicly available sources at the time of preparation of the cumulative effects assessment. Section 10 of the Final EA/IS demonstrates that the Community Access Road was not assessed in isolation, but rather within a broader regional context— confirming that cumulative impacts were thoroughly considered and assessed based on available information.</p> <p>Although the Community Access Road is frequently linked to larger regional efforts such as the Ring of Fire, Marten Falls First Nation underscores that this Environmental Assessment / Impact Assessment process is focused solely on the advancement of the Community Access Road itself—an infrastructure</p>		

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
			<p>project the Marten Falls community has been advocating for almost four decades. Furthermore, as of January 20, 2026, the Regional Assessment for the Ring of Fire is not available to the public. The regional assessment working group only submitted the interim report to the Chiefs of Partner First Nations and to the Minister of the Environment, Climate Change and Nature.</p>		
Fort Albany First Nation	22	<p>The draft EA/IS does not consider how project related habitat alteration and landscape change could contribute to increased abundance of certain insect populations and the resulting ecological impacts. While the EA/IS assess is negative effects on pollinating insects from construction and operation activities, it does not evaluate the potential for insect overpopulation to cause broader environmental consequences- such as ecological imbalance, vegetation stress, or shifts in predator prey dynamics. These effects could be particularly relevant in disturbed or reclaimed areas, where conditions may Favor population booms of opportunistic species.</p> <p>The EA/IS also does not include Indigenous Knowledge or local observations of previous insect</p>	<p>Certain insect populations can increase due to several factors including: outcomes of climate change, a reduction in predators, and an increase in invasive plant species. An increase in invasive plant species that thrive in disturbed environments can allow habitat generalist insect species to increase. The Final ES/IA assessed the impacts of introduction and spread of invasive plant species and determined that after mitigation, the effects are predicted to be possible and infrequent and confined to the construction disturbance area. These effects were assessed as having a negligible magnitude. The effect of an increase in invasive plant species was not predicted to measurably degrade wildlife habitat beyond the construction disturbance footprint (i.e. in the Local and Regional Study Areas). Therefore, any</p>	Comment noted; see response for details	135

Table: Summary of Feedback Received and Response / Action – Fort Albany First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>population increases following landscape changes.</p> <p>These represents a gap in the current impact assessment framework. Indigenous knowledge and local ecological observations may provide insight into past experiences with insect population changes and related environmental impacts, especially following habitat disturbance.</p> <p>We recommend that the EAIS be revised to include an analysts of potential environmental consequences from increased insect abundance, including culturally or ecologically significant feedback effects, to ensure the long term integrity of affected ecosystems is properly evaluated.</p>	<p>increases in insect populations as a result of the Project would be unlikely to have a measurable effect on the local and regional environmental conditions.</p> <p>A decline in predator species (i.e., bats and insectivorous birds) can upset the predator prey balance and remove a control on insect populations. The Final EA/IS assessed the Community Access Road’s impacts on insect predators including bats and insectivorous birds. The assessment predicted that the Community Access Road would not have significant effects on these insect predator species populations in the Local and Regional Study Areas. Therefore, it is unlikely that insect population increases will occur as a result of a reduction in predation.</p>		