

Appendix C5

Feedback and Response Log - Indigenous Communities - Ginoogaming First Nation



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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
Ginoogaming First Nation	1	<p>The EA/IS presents the MFCAR as a project intended to meet the needs of Marten Falls First Nation, yet statements within the EA/IS reveal a broader, unstated objective: to facilitate large-scale industrial development in the Ring of Fire. For example, Section 4.1.1 acknowledges that, "without the MFCAR it would not be possible to develop proposed mineral projects in the far north that the Province has indicated its support for." Similarly, projected traffic levels in Section 7.2.5.1 (up to 700 vehicles per day by 2046) are far beyond what would be expected for a community of fewer than 500 residents and are more consistent with major industrial operations.</p> <p>This discrepancy suggests that the EA is being used to advance a broader infrastructure and mining development agenda without appropriately assessing the cumulative environmental and cultural consequences of that development. The MFCAR is not merely a community road; it is an enabling corridor for full-scale mineral exploitation in one of the most ecologically and culturally sensitive regions of Ontario.</p> <p>A. Ontario and Canada should explicitly acknowledge and assess the MFCAR as</p>	<p>A: We appreciate your feedback and the time you have taken to share your perspective. However, the comments are directed at government agencies and outside the scope of the Community Access Road. We would therefore encourage you to direct these to the regulators, as they will be best positioned to address them.</p> <p>B: 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 project the Marten Falls community has been advocating for almost four decades. 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. The broader regional development scenario is not a regulatory requirement for the Project and as such was not developed as part of the Environmental Assessment / Impact Statement.</p>	Comment noted; see response for details.	739

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		<p>a catalyst for industrial development in the Ring of Fire or Ontario and Canada should commit to not developing the mineral resources in the Ring of Fire. B. All predicted impacts in the EA/IS (e.g., traffic, water use, emissions, habitat fragmentation, hydrological changes) must be re-evaluated based on this broader regional development scenario, rather than an artificially narrow scope focused solely on Marten Falls community access needs.</p>			
Ginoogaming First Nation	2	<p>The introduction of Ontario’s proposed Bill 5 (2025) raises significant concerns about the future permitting framework for the MFCAR project. Now passed into law, this legislation enables exemptions from critical provincial permitting processes, including those under the Aggregate Resources Act, Permits to Take Water, and Environmental Compliance Approvals. These permitting pathways currently serve as key mechanisms for technical review, environmental protection, and Indigenous consultation. Exemptions under Bill 5 introduce substantial regulatory uncertainty and elevate environmental and rights-based risks, particularly in a region of high ecological sensitivity and cultural importance to our</p>	<p>A: Marten Falls First Nation (MFFN) has been working on the Community Access Road since 2019, released the Draft EA/IS in February 2025 and submitted the Final EA/IS in February 2026. The issuing of Bill 5 does not void the requirements outlined under the Terms of Reference, the Tailored Impact Statement Guideline or the commitments within the Final EA/IS.</p> <p>B: Bill 5 does not revoke the commitments MFFN has made in the Final EA/IS or to Indigenous Communities as part of its consultation and engagements efforts to date. MFFN has and continues to be committed to meaningful consultation with neighbouring Indigenous Communities.</p>	Comment noted; see response for details.	740

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		<p>Nation. The EA/IS does not acknowledge or evaluate these emerging risks, despite their potential to fundamentally alter how the project is reviewed, approved, and monitored.</p> <p>A. The Proponent should commit to upholding existing environmental and permitting standards, even if future changes to legislation (such as under Bill 5) provide exemptions. This includes a commitment to continue seeking Permits to Take Water, Environmental Compliance Approvals, and approvals under the Aggregate Resources Act (and fulfilling consultation requirements with our Nation for each permit) regardless of any exemption status.</p> <p>B. The Proponent should formally commit to meaningful consultation with GFN throughout all permitting and regulatory phases of the project, regardless of the requirements imposed (or waived) by the Province. These commitments should be documented and reflected in the Impact Statement and any subsequent agreements to ensure accountability, transparency, and trust. Recognizing the heightened risk posed by legislative uncertainty, the EA/IS should be revised to include a detailed risk assessment of potential regulatory changes and their</p>	<p>The 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. The development of a detailed risk assessment of potential regulatory changes and their implications is not a regulatory requirement and as such was not developed as part of the EA/IS.</p>		

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		<p>implications for the project and Indigenous rights.</p>			
Ginoogaming First Nation	3	<p>In a response to Attawapiskat First Nation in Table 11-9 of the EA/IS, the Proponent states that: “the Regional Impact Assessment led by the Agency is outside of the scope of the MFCAR. The draft Terms of Reference for the Regional Assessment in the Ring of Fire Area were released in September 2024.”</p> <p>This exclusion is both inappropriate and short-sighted. The MFCAR is not an isolated community project — it is a critical component of a broader infrastructure corridor aimed at enabling large-scale mineral development in the Ring of Fire region. As acknowledged in the EA/IS itself (Section 4.1.1), the MFCAR is a necessary precondition for proposed mineral development in the Far North, a position echoed in provincial policy and public discourse.</p> <p>The EA/IS assertion that the RoF Regional Assessment (RA) is “outside of the scope” of this EA/IS is a concerning attempt to artificially narrow the project’s scope, contrary to the principles of cumulative effects assessment required under the Impact Assessment Act and</p>	<p>A: We appreciate and acknowledge your sharing of your perspective. However, the comments are directed at government agencies and outside the scope of the Community Access Road. We would therefore encourage you to direct these to the regulators, as they will be best positioned to address them.</p> <p>B: Refer to response A.</p> <p>C: We acknowledge the importance of the Regional Assessment and the broader context in which the Community Access Road project exists. However, it is important to clarify that the Regional Assessment is being led by the Impact Assessment Agency of Canada (IAAC) and is outside the scope of the Community Access Road, which is being conducted under a separate and established regulatory process.</p> <p>While we recognize that the Community Access Road is one of the components of potential future development in the region, the draft Terms of Reference for the Regional Assessment were only released in September 2024. The draft</p>	Comment noted; see response for details.	741

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		<p>the purpose of the RoF RA.</p> <p>Furthermore, the timeline for the Regional Assessment is clear, with a deadline for the Interim Report of January 20, 2026, and a Final Report expected by June 20, 2027.</p> <p>Moving forward with this EA/IS prior to the completion of the RoF RA fragments the assessment of environmental, hydrological, and cultural impacts across multiple EAs — a result the RoF RA was specifically intended to avoid.</p> <p>A. The Impact Assessment Agency of Canada (IAAC) should not allow the MFCAR EA/IS to proceed to final decision-making until the outcomes of the Ring of Fire Regional Assessment are known.</p> <p>B. IAAC should suspend or defer the EA/IS decision until at least the release of the RoF RA Interim Report (January 2026), and ideally until the Final Report (June 2027), to ensure decisions are based on the best available regional and cumulative impact information.</p> <p>C. Within the EA/IS, the Proponent should include a formal mechanism for revisiting and re-evaluating project approvals, mitigation measures, and</p>	<p>EA/IS for the Community Access Road was released in February 2025, and at that time, the Regional Assessment process was in its very early stages. There was no practical or procedural basis to incorporate the Regional Assessment into the scope of the Community Access Road project.</p> <p>It would not have been feasible to delay the draft EA/IS in anticipation of a separate process with a final report not expected until mid-2027. Instead, it will be the responsibility of the IAAC, as the lead for the Regional Assessment, to consider the Community Access Road and other related projects within the broader cumulative effects framework of the Ring of Fire.</p> <p>Marten Falls First Nation (MFFN) remains committed to transparency and collaboration and will continue to share relevant information with the IAAC to support their work. Thank you again for your engagement and for contributing to a thoughtful and informed dialogue on development in the Far North.</p> <p>D: Refer to response A.</p>		

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		<p>routing in light of the RoF RA findings. D. IAAC and Ontario should publicly clarify how the outcomes of the RoF RA will be integrated into this and related road and mine EAs, to prevent fragmented and duplicative decision-making.</p>			
Ginoogaming First Nation	4	<p>The MFCAR and the Northern Road Link Project are, at their core, intended to enable industrial access to the Ring of Fire mineral deposits. This underlying objective is evident from numerous public statements by the Government of Ontario, which has repeatedly emphasized their commitment to accelerating development in the Ring of Fire region. This includes clear expressions of support for Wyloo Metals' Eagle's Nest Project - one of the most advanced mining proposals in the area.</p> <p>Despite this, the EA/IS process for the MFCAR fails to adequately acknowledge the road's true purpose as a key industrial corridor. As a result, the assessment does not fully capture the scale or nature of the adverse impacts that are likely to follow.</p> <p>The MFCAR is expected to support sustained, high-volume industrial traffic,</p>	<p>A: We appreciate your feedback and the time you have taken to share your perspective. However, the comments are directed at government agencies and outside the scope of the Community Access Road. We would therefore encourage you to direct these to the regulators, as they will be best positioned to address them.</p> <p>B: As stated in Section 2.2 of the Draft EA/IS and Final EA/IS, "While the main use of the Community Access Road will be for our community, the road will also be used for potential future mineral exploration." This reflects a transparent acknowledgment of the Community Access Road's multi purpose.</p> <p>The Community Access Road is a multi-purpose, all-season connection that will provide Marten Falls First Nation with year-round access to essential services, reduce the cost of living, and unlock</p>	Comment noted; see response for details.	742

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		<p>primarily from mining operations. This will likely involve frequent heavy-haul truck transport of ore and mineral concentrates between the Ring of Fire and the CN rail line. Such industrial use will significantly heighten environmental risks, disrupt traditional land use, and infringe upon the rights and interests of GFN.</p> <p>It is critical that the EA/IS fully consider these foreseeable, long-term industrial impacts—not just under the narrow framing of a MFCAR, but in the broader context of regional mining infrastructure development.</p> <p>A. Ontario and Canada must explicitly acknowledge the MFCAR’s intended role as a key transportation corridor for mining development in the Ring of Fire. This includes a clear articulation of its function in supporting industrial activities such as the transport of ore and mineral concentrates by heavy-haul trucks. Alternatively, Canada and Ontario should clarify that the MFCAR will not be used to access the Ring of Fire.</p> <p>B. Accordingly, the EA/IS should be expanded to include a comprehensive assessment of the cumulative and project-specific impacts associated with sustained industrial traffic. This should</p>	<p>long-term economic opportunities. These include employment, business development, and improved access to healthcare and education. The economic and social benefits for Indigenous communities—and the region as a whole—are substantial and must be considered alongside the Community Access Road’s potential role in resource development.</p> <p>As outlined in Section 10 of the Draft EA/IS and Final EA/IS, “The Impact Assessment Act (Government of Canada, 2017a) requires that each Environmental Assessment of a project take into account any cumulative environmental effects that are likely to result from the project in combination 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 approved Terms of Reference for the Community Access Road. Notably, Table 10.1-1 of the Draft EA/IS and Final EA/IS identify infrastructure projects with spatial or temporal overlap with the Community Access Road, based on publicly available sources. This demonstrates that the Community</p>		

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		<p>encompass effects on the environment, wildlife, water systems, and traditional land use, as well as the potential infringement on Indigenous rights and interests.</p> <p>C. In addition, future stages of the EA/IS process must incorporate meaningful engagement with GFN, with specific attention to how industrial use of the road will affect our lands, livelihoods, and jurisdictional authority. Any approval of the project should be contingent upon transparent assessment of these impacts and the establishment of enforceable mitigation, monitoring, and accommodation measures.</p>	<p>Access Road was not assessed in isolation, but rather within a broader regional context—ensuring that cumulative impacts were thoroughly considered.</p> <p>C: Marten Falls First Nation is committed to continuing to engage and consult with Indigenous communities. Furthermore, should the Community Access Road EA / IS be approved to proceed, a consultation and engagement program will be established to guide discussions through detail design.</p>		
Ginoogaming First Nation	5	<p>The EA/IS for the MFCAR is being fully funded by the Government of Ontario, which also serves as the primary regulatory authority responsible for approving the EA/IS and issuing associated permits.</p> <p>Public statements from Premier Doug Ford and other senior provincial officials have made it unequivocally clear that the Ontario Government views the MFCAR and the Northern Road Link as strategic infrastructure to accelerate access to the Ring of Fire and facilitate the extraction of both critical and conventional minerals.</p>	<p>A. We appreciate your feedback and the time you have taken to share your perspective. However, the comments are directed at government agencies and outside the scope of the Community Access Road. We would therefore encourage you to direct these to the regulators, as they will be best positioned to address them.</p> <p>B. As the Proponent, Marten Falls First Nation has engaged 22 neighbouring Indigenous communities, including Ginoogaming First Nation on this Project since 2021. In addition to regular</p>	Comment noted; see response for details.	743

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		<p>Given this dual role as both project funder and regulator— and the Province’s stated objective of expediting mining development - GFN asserts that the Government of Ontario is in a clear conflict of interest. This conflict undermines the integrity of the EA/IS process, particularly in relation to its obligations to uphold environmental protection and ensure meaningful, good-faith consultation with First Nations whose rights and lands are directly impacted by the project.</p> <p>A. To address the clear conflict of interest posed by the Ontario Government’s dual role as both project funder and regulatory authority for the MFCAR EA/IS, IAAC must establish independent oversight for the Project that is joint with GFN.</p> <p>B. IAAC must develop a terms of reference for the independent oversight that facilitates impartial evaluation of the EA/IS and its outcomes, particularly in light of the Province’s stated economic interests in rapidly developing the RoF. Oversight should include independent environmental experts, as well as representation from GFN, to ensure the process is guided by the principles of transparency, accountability, and respect</p>	<p>monthly outreach, information sharing and offers to meet, the Proponent has sought involvement from Indigenous communities via the Indigenous Knowledge, Community Coordinator and the Community Capacity Funding programs. Marten Falls First Nation would be happy to reconnect and re-engage with Ginoogaming First Nation in the hope of achieving a relationship building meeting between the two Nations.</p> <p>The involvement of Indigenous communities in this process will be determined during the detail design phase. At that time, engagement processes will be further defined to enable appropriate participation and representation.</p> <p>C: See response to A.</p>		

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		<p>for Indigenous rights and jurisdiction. C. IAAC should exercise its authority to ensure that meaningful consultation with GFN is upheld in accordance with the Honour of the Crown, and that cumulative impacts of industrial development in the region are fully assessed, including through the RoF RA.</p>			
Ginoogaming First Nation	6	<p>The proposed MFCAR is located within the homelands of GFN where our members maintain a strong and ongoing connection to the land, including extensive use of the area directly affected by the proposed route.</p> <p>Despite this, GFN has received only limited consultation and engagement by the Proponent and Crown on MFCAR, likely due to the location of GFN's reserve lands. To date, neither the Proponent nor the Government of Ontario has implemented any meaningful accommodation measures to address or offset the adverse impacts these projects may have on GFN's land use, rights, and cultural practices.</p> <p>This lack of meaningful engagement and absence of accommodation is inconsistent with the Crown's duty to consult and accommodate under Section</p>	<p>A. We appreciate your feedback and the time you have taken to share your perspective. However, Comment A is directed at government agencies and outside the scope of the Community Access Road. We would therefore encourage you to direct these to the regulators, as they will be best positioned to address them.</p> <p>B. As the Proponent, Marten Falls First Nation (MFFN) has made genuine efforts in engaging and including neighbouring Indigenous communities in the Assessment process since the start of the Environmental Assessment milestone in October 2021. Efforts to support Ginoogaming First Nation (GFN) have included funding opportunities through the Indigenous Knowledge (IK) Program and Community Capacity Funding Program, of which GFN took part in both. The Proponent has sought their input via</p>	Comment noted; see response for details.	744

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		<p>35 of the Constitution Act, 1982 and undermines reconciliation efforts.</p> <p>A. Canada should withhold a decision on the MFCAR until GFN has been meaningfully consulted and accommodated for the Project.</p> <p>B. This consultation must be conducted in good faith, be adequately resourced, and occur early enough in the decision-making process to influence Project outcomes. It must also recognize GFN's homelands, land use, and rights that are likely to be adversely affected by the proposed developments.</p> <p>C. In addition, concrete and enforceable accommodation measures must be developed in partnership with GFN to address project-related impacts, including environmental degradation, disruption to traditional land use, and infringement on cultural and spiritual sites.</p> <p>D. These measures should be formalized through legally binding agreements (with the Government of Ontario or the Proponent) and supported by ongoing monitoring and oversight with GFN's full participation.</p>	<p>six community-specific meetings, five Public Information Centres, the Aboriginal and / or Treaty Rights and Interests (ATRI) and Three Road Forums and with the release of the Draft Preliminary ATRI Existing Conditions Report, the ATRI Draft Impact Assessment Report and the release of the Draft Environmental Assessment / Impact Statement. In addition, four Milestone Progress Reports have been provided to GFN for their review and confirmation of engagement activities.</p> <p>Should the Community Access Road EA / IS be approved to proceed, a consultation and engagement program will also be established to guide discussions through detail design.</p> <p>C. It should be noted that if approval for the Community Access Road is granted under the provincial Environmental Assessment Act, the Community Access Road must follow the approval conditions within. This can, for example include the approved project design, mitigation measures and commitments made during the Environmental Assessment process.</p> <p>D. As noted in Ginoogaming First Nation</p>		

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			<p>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 Ginoogaming First Nation will be established.</p>		
Ginoogaming First Nation	7	<p>Section 4.5 of the EA/IS states that the Preferred Route was not the engineers' preferred option, and that the Project Team worked with engineers to ensure that the selected route is "constructable and safe" for long-term use. However, the EA/IS provides no detailed explanation of the engineering rationale, the specific concerns raised about constructability, or the trade-offs between engineering feasibility, cost, and environmental or cultural considerations.</p> <p>There is also no information provided on</p>	<p>A: Please refer to Appendix A Metrics to Help Identify a Preferred Route for the metric tables used in the route evaluation, including the engineering metrics considered.</p> <p>B: The Final EA/IS was prepared to meet the requirements outlined in the Terms of Reference and the Tailored Impact Statement Guidelines. Disclosure of construction cost estimates is not a requirement of the Final EA/IS and as such will not be provided.</p>	Comment noted; see response for details.	745

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		<p>the cost implications of selecting a less technically preferred route. Without this information, reviewers cannot evaluate:</p> <ul style="list-style-type: none"> • Whether the Preferred Route is truly sustainable and economically viable; • What long-term risks may be introduced due to terrain, hydrology, or maintenance challenges; • How engineering mitigation will be applied to address those risks. <p>Given the complexity of northern infrastructure development — including challenging soil conditions, sensitive waterways, wetlands, and potential permafrost — it is essential to understand not only how the route balances environmental and cultural values, but what the technical and financial costs are of those decisions.</p> <p>A. The Proponent should include a summary of the engineers’ comparative assessment of all routes, identifying:</p> <ul style="list-style-type: none"> • The engineering reasons why certain routes were preferred or not preferred; • The specific challenges associated with the selected route; • How those challenges will be mitigated through design, construction, and long-term maintenance. 	<p>C: The objectives of Section 4 of the Final EA/IS, Appendix A and Appendix B Route Selection Methodology are to provide information on how the Preferred Route was selected. Providing detailed explanations on concerns raised by engineers and how these were addressed are not a requirement of the Final EA/IS.</p>		

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		<p>B. The Proponent should disclose cost comparisons between the Preferred Route and other technically preferred alternatives, including:</p> <ul style="list-style-type: none"> • Estimated construction costs; • Projected lifecycle maintenance costs; • Any known increased risks to durability or access resulting from site conditions (e.g., unstable soils, flood-prone areas, water crossings). <p>C. The Proponent should explain how constructability concerns raised by engineers have been fully addressed, and whether additional study or contingency planning will be required prior to detailed design.</p>			
Ginoogaming First Nation	8	<p>Section 6.8.2 of the EA/IS reveals that:</p> <ul style="list-style-type: none"> • “Construction of the MFCAR is anticipated to start within 2 to 5 years of Environmental Assessment / Impact Statement approval, depending on funding and permit acquisition; and • construction duration is anticipated to last between 3 and 10 years.” <p>This extended window — up to 15 years from approval to completion — points to significant uncertainty regarding the practical feasibility of building the</p>	<p>A: We appreciate your feedback and the time you have taken to share your perspective. Timelines provided are projections based on constructing a road in a remote, undisturbed location in northern Ontario . As mentioned, project approval, funding and permit acquisition require cooperation with government agencies and these timelines are not in the control of Marten Falls First Nation.</p> <p>Please note that comments related to mineral development and the Ring of Fire</p>	Comment noted; see response for details.	746

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		<p>MFCAR. Such a broad timeline suggests unresolved issues related to permitting, engineering challenges, seasonal construction limits, and public financing. This lack of clarity significantly undermines the ability to evaluate the real costs, risks, and benefits of the project.</p> <p>Moreover, this uncertainty must be assessed in the broader context of Ontario’s stated goal of using the MFCAR to catalyze mineral development in the Ring of Fire, as referenced in Section 4.1.1 of the EA/IS. However, even if the MFCAR is eventually built, the Northern Road Link and the mines themselves have not yet been permitted or funded — and will face their own environmental and logistical hurdles. In other words, the MFCAR is being evaluated in isolation while depending entirely on a much larger and risk-laden infrastructure and industrial development plan that is far from guaranteed.</p> <p>Further compounding this uncertainty is the fact that the key commodities expected from the Ring of Fire — nickel and chromium — are subject to high global price volatility. Recent history has shown both metals fluctuate significantly</p>	<p>are out of scope of the Community Access Road. We would therefore encourage you to direct these to the regulators, as they will be best positioned to address them.</p> <p>B: See response to A.</p> <p>C: See response to A.</p>		

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		<p>in price due to changing demand, geopolitical factors, and technological shifts (e.g., battery chemistry in electric vehicles). There is no assurance that future prices will support the profitability of mining operations in this remote and costly region, particularly given the massive infrastructure investments required just to make the mines accessible.</p> <p>Taken together, these risks suggest that the return on investment (ROI) for Ontario is highly speculative. Building the MFCAR without a firm understanding of when or whether the rest of the Ring of Fire infrastructure and mining developments will proceed — or whether the commodities will retain market value — exposes very large sums of public funds to substantial risk. These public funds could be allocated to other Projects that are of much higher importance to GFN, have a much lower risk profile and are likely to have less dramatic impacts.</p> <p>A. Ontario should disclose cost estimates for the MFCAR under a range of construction durations, including worst-case scenarios for cost overruns and delays.</p>			

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		<p>B. The Proponent and the Province of Ontario should provide an independent economic analysis that includes:</p> <ul style="list-style-type: none"> • Projected ROI based on realistic construction and permitting timelines for all related infrastructure (including the Northern Road Link and the mines); • Sensitivity testing of net benefits based on nickel and chromium price volatility; • Clear disclosure of who bears financial and environmental risk under various development outcomes. <p>C. IAAC should impose a Condition of Approval on the Project that a full regional infrastructure and economic development plan is presented to the public and Indigenous Nations, with transparent cost-benefit and risk analyses that compares to alternative resource development projects in Ontario that could be funded as an alternative.</p> <p>C. IAAC should impose a Condition of Approval on the Project that a full regional infrastructure and economic development plan is presented to the public and Indigenous Nations, with transparent cost-benefit and risk analyses that compares to alternative resource development projects in</p>			

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		Ontario that could be funded as an alternative.			
Ginoogaming First Nation	39	<p>The EA/IS appears to place significant emphasis on the perspectives and interests of Marten Falls First Nation and Aroland First Nation, particularly in relation to route selection, project design, environmental monitoring and proponent collaboration. This is understandable given their geographic proximity to the project and as directly affected communities with strong, well-established rights and interests in the area.</p> <p>However, GFN also holds a strong and well-established relationship to the lands and waters affected by the MFCAR. The rights, interests, and responsibilities of GFN — including under Section 35 of the Constitution — are clearly impacted by the Project, yet the EA/IS does not appear to reflect the Nation’s perspectives or concerns with the same level of attention or integration as those of Marten Falls and Aroland.</p> <p>Many GFN families have ancestral and present-day ties to the Aroland area, and our members actively live, harvest, trap, and carry out cultural practices</p>	<p>Marten Falls First Nation is the proponent of the Community Access Road and as such is leading the EA/IS, environmental oversight and discussions on mitigation and enhancement measures.</p> <p>As noted in Ginoogaming First Nation 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 Ginoogaming First Nation will be established.</p>	Comment noted; see response for details.	748

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		<p>throughout the region. In fact, several GFN land users hold traplines that run directly through or adjacent to the proposed road corridor and will be directly impacted by both construction and long-term use of the road. Despite these clear and substantial connections, GFN has often felt that we must prove our presence and land use in order for our concerns to be recognized</p> <p>While it is appropriate for the EA/IS to highlight the role of Nations geographically closest to the project, a more balanced and inclusive approach that reflects the knowledge, governance, and stewardship responsibilities of all impacted Nations — including GFN — is essential to ensure the assessment process is fair, comprehensive, and credible.</p> <p>GFN insists that our Nation be afforded equal treatment in environmental oversight and mitigation and accommodation measures for MFCAR, along with Marten Falls and Aroland.</p>			
Ginoogaming First Nation	10	The approach to assessing cumulative effects outlined in the EA/IS — which involves identifying residual effects of the MFCAR, defining spatial and temporal	A. We acknowledge the importance of the Regional Assessment and the broader context in which the Community Access Road project exists. However, it	Comment noted; see response for details.	749

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		<p>boundaries based on those effects, and identifying overlapping project interactions — is overly narrow and methodologically insufficient given the complexity of the environmental, cultural, and ecological systems potentially affected by the MFCAR project. Specifically, this interaction-based approach fails to account for:</p> <ul style="list-style-type: none"> • Non-point, system-wide stressors such as climate change, which interact with and amplify local disturbances but are excluded from the analysis because they are not tied to a specific, overlapping “reasonably foreseeable project”; • Chronic and compounding effects on vulnerable species such as boreal caribou, who are highly sensitive to even small-scale habitat fragmentation. Caribou populations do not experience effects in a linear or additive way — rather, the cumulative degradation of intact habitat and increased human presence leads to disproportionately severe outcomes over time; • Indigenous land-use systems and knowledge, which emphasize the interconnectedness of all aspects of land, water, animals, and people. The current CEA framework, rooted in Western analytical methods, fails to incorporate Indigenous values, long-term 	<p>is important to clarify that the Regional Assessment is being led by the Impact Assessment Agency of Canada (IAAC) and is outside the scope of the Community Access Road, which is being conducted under a separate and established regulatory process.</p> <p>While we recognize that the Community Access Road is one of the components of potential future development in the region, the draft Terms of Reference for the Regional Assessment were only released in September 2024. The draft EA/IS for the Community Access Road was released in February 2025, and at that time, the Regional Assessment process was in its very early stages. There was no practical or procedural basis to incorporate the Regional Assessment into the scope of the Community Access Road project. As of January 20, 2026, the Regional Assessment for the Ring of Fire is not available to the public. The regional assessment working group submitted the interim report to the Chiefs of Partner First Nations and to the Minister of the Environment, Climate Change and Nature.</p> <p>It will be the responsibility of the IAAC, as</p>		

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		<p>observations, and relational understandings of how ecosystems experience and respond to stress.</p> <ul style="list-style-type: none"> • The broader strategic development context in which this road will enable a series of industrial developments in the Ring of Fire region. <p>This assessment is also being carried out in parallel with the RoF RA, a process designed explicitly to examine cumulative effects at the regional scale — including cumulative biodiversity loss, Indigenous land-use fragmentation, and ecological tipping points. While Table 11-9 of the EA/IS asserts that the RA is “outside the scope” of the MFCAR, this interpretation limits the value of that important work and ignores the significant overlap in purpose and geographic relevance between the two processes.</p> <p>A. The Proponent should defer the finalization of cumulative effects conclusions in the MFCAR EA/IS until at least the interim findings of the Regional Assessment (expected January 20, 2026) are released. This will allow the EA/IS to incorporate emerging regional-scale data, thresholds, and Indigenous-defined values and indicators.</p>	<p>the lead for the Regional Assessment, to consider the Community Access Road and other related projects within the broader cumulative effects framework of the Ring of Fire. Marten Falls First Nation remains committed to transparency and collaboration and will continue to share relevant information with the IAAC to support their work.</p> <p>B. The Community Access Road is intended to improve access, foster economic development and improve the overall quality of life for Marten Falls First Nation members. 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 project the Marten Falls community has been advocating for almost four decades.</p> <p>The cumulative effects assessment considered traffic for all reasonably foreseeable projects as outline in Table 10.1-1 of the Final EA/IS. The full build-out of the Ring of Fire is not understood and adequate information is not available</p>		

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>B. The Proponent should shift the CEA from a projectby-project residual effect model to a scenario-based, regionally integrated assessment approach, using multiple development futures (e.g., full buildout of MFCAR, Northern Road Link, and Ring of Fire mines) to model cumulative effects on key values such as water, caribou, and Indigenous cultural continuity.</p> <p>C. The Proponent should expand the scope of the cumulative effects assessment to include non-project stressors such as:</p> <ul style="list-style-type: none"> • Climate change; • Regional hydrological shifts; • Long-range pollution (e.g., mercury transport); • Landscape-level fire suppression and forestry legacies. • Long-term habitat fragmentation trends; • Disturbance buffers beyond the road right-of-way; • Thresholds for population viability under the federal Boreal Caribou Recovery Strategy. <p>D. The Proponent must incorporate all reasonably foreseeable developments associated with the Project into the CEA, including those linked to the broader</p>	<p>to determine the potential cumulative effects from all potential Ring of Fire developments, and therefore cannot be considered reasonably foreseeable.</p> <p>C: The cumulative effects assessment included considerations for non-project stressors as outlined below:</p> <ul style="list-style-type: none"> • Climate change: see Appendix Y Climate Adaptation and Resiliency Technical Support Document • Regional hydrological shifts: see Appendix F Surface Water Technical Support Document • Long-range pollution (e.g., mercury transport): see the problem formulation provided in Appendix T Community Well-Being Technical Support Document • Landscape-level fire suppression and forestry legacies: see Appendix Y Climate Adaptation and Resiliency Technical Support Document • Long-term habitat fragmentation trends: see Appendix K Wildlife Technical Support Document, Appendix L Birds Technical Support Document and Appendix M Ungulates Technical Support Document • Disturbance buffers beyond the road right-of-way: see buffers identified as mitigation measures in Appendix AA Summary and Recommendations Tables 		

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>regional development trajectory of the Ring of Fire.</p>	<ul style="list-style-type: none"> • Thresholds for population viability under the federal Boreal Caribou Recovery Strategy: see Appendix M Ungulates Technical Support Document <p>D: 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 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, 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). Potential projects within the Ring of Fire that do not meet the definition of reasonably foreseeable were not included. The list of activities included in the cumulative effects assessment is provided in Table 10.1-1 of the Final EA/IS. This table identifies the projects and activities that met the</p>		

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
			spatial and temporal overlap criteria and for which publicly available information was accessible at the time of assessment.		
Ginoogaming First Nation	11	<p>GFN has noted the importance of establishing a stronger government-to-government relationship with the Proponent and regarding the MFCAR Project. While there have been efforts to engage through technical meetings and formal consultations, members of GFN, have consistently expressed a desire for more direct and collaborative discussions that reflect the Nation’s role as a rights-bearing government with long-standing connections to the project area.</p> <p>GFN requests that MFFN Chief and Council participate in a formal government-to-government dialogue with GFN. GFN would welcome the opportunity to sit down with MFFN leadership (not consultants) and “break bread” as a way to build a respectful and collaborative relationship. This engagement would provide a foundation for inclusive and informed decision-making that reflects the values and priorities of both Nations with longstanding connections to the land.</p>	Ginoogaming First Nation's request for a government-to-government dialogue with Marten Falls First Nation has been shared with Chief and Council.	Comment noted; see response for details	758

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
Ginoogaming First Nation	12	<p>GFN has experienced significant degradation of our traditional homelands since the signing of Treaty 9. Over time, development pressures have reduced our ability to live from the land as our ancestors did. Much of our territory is no longer able to support a subsistence lifestyle due to loss of access, contamination, and reduced productivity of natural resources. These changes have had a profound effect on our ability to exercise our Treaty rights in a meaningful way. The area affected by the MFCAR is one of the few remaining parts of our traditional territory that remains relatively undisturbed. Any further development in this region is viewed by GFN as a significant impact because of what has already been lost across our lands.</p> <p>GFN does not share the same definition of "significant impact" as that used in the environmental assessment grounded in Western science. From a GFN perspective, any damage to the lands, waters, or animals we rely on is significant, particularly in places that still support our cultural practices and way of life. GFN strongly disagrees with the Proponent's conclusion that impacts to fish, wildlife (aside from caribou and</p>	<p>A. The Environmental Assessment / Impact Statement (EA / IS) was prepared to meet provincial and federal regulatory requirements including the Tailored Impact Statement Guidelines issued by the Impact Assessment Agency of Canada issued and the Terms of Reference agreed to with the Province. The Province will determine if the EA / IS meets the provincial requirements; while the Agency will make a determination on whether or not it meets the key issues under federal jurisdiction.</p> <p>B. See response to A.</p>	Comment noted; see response for details.	760

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>wolverine), and water will not be significant. These resources are vital to our health, identity, and responsibilities to the land.</p> <p>A. GFN requests that the EA/IS recognize and apply GFN's perspective on significance. The assessment should acknowledge that GFN defines significance not only by measurable environmental thresholds, but by the potential for harm to traditional use, cultural continuity, and Treaty rights. The EA/IS must address all impacts to wildlife, fish, and water as significant within this broader understanding.</p> <p>B. In addition to working with GFN to revise significance assessments, GFN requests that the Proponent, to start, assume that all impacts will be significant, unless there is an exceptionally strong justification to suggest otherwise.</p>			
Ginoogaming First Nation	13	<p>GFN has emphasized that the impacts of the Project are not limited to immediate environmental changes but extend deeply into cultural and intergenerational spheres. GFN is concerned that the project will further restrict opportunities for land-based learning and cultural practices that connect youth to their</p>	<p>1. We acknowledge Ginoogaming First Nation's concern regarding the need for the environmental assessment to explicitly consider cultural and intergenerational impacts.</p> <p>In addition to the Indigenous communities located within the Local</p>	<p>Comment noted; see response for details</p>	761

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>identity, language, and responsibilities to the land. Young people are already experiencing a growing disconnection from their territory due to cumulative industrial development, and that this road will accelerate that loss.</p> <p>The project area is used for hunting, fishing, trapping, gathering, and cultural teachings. These are not just activities, but ways of life that foster intergenerational knowledge transfer. Disrupting access to these spaces poses a serious risk to GFN’s ability to uphold cultural continuity and support the next generation in learning who they are as Anishinaabe people.</p> <p>GFN requests that the environmental assessment explicitly considers the cultural and intergenerational impacts of the project, including how it will affect the ability of youth to access, learn from, and build relationships with the land. This includes assessing the loss of culturally important areas and the broader implications for identity, language, and traditional knowledge systems. The Proponent should work with GFN to identify appropriate mitigation strategies that support cultural preservation and uphold opportunities for intergenerational</p>	<p>Study Area (Marten Falls First Nation and Aroland First Nation), we recognize that several Indigenous communities within the Regional Study Area also maintain traditional practices—such as hunting, fishing, and travel on waterways—that may have a potential pathway for effect within the Local Study Area of the Community Access Road. To make sure this is accurately reflected, the effects assessment methodology has been updated to include Indigenous communities where a clear pathway for potential impact exists. This approach makes sure that potential effects on traditional land use, culturally important sites, and broader cultural practices are appropriately and systematically assessed.</p> <p>To determine whether a pathway for effect exists, we relied on each community’s Aboriginal and Treaty Rights and Interests (ATRI) report. These ATRI reports, while confidential, identify each community’s Areas of Interest. These Areas of Interest were compared against the Local Study Area to identify any overlap. Where overlap was present—and a reasonable pathway for effect was identified—the community was included in the assessment. Where potential</p>		

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>knowledge transfer for future generations.</p>	<p>effects were identified, corresponding mitigation measures have been proposed.</p> <p>2. We acknowledge Ginoogaming First Nation's request to identify appropriate mitigation strategies that support cultural preservation and uphold opportunities for intergenerational knowledge transfer for future generations.</p> <p>Should the Final EA/IS for the Community Access Road be approved to proceed, a consultation and engagement program will be established to guide discussions through detail design, including with Ginoogaming First Nation.</p>		
Ginoogaming First Nation	14	<p>GFN has experienced significant and ongoing impacts from roads constructed within our traditional territory without adequate access controls. In the past, such roads have led to increased poaching, unregulated hunting, unauthorized industrial activity, and disturbances to cultural and spiritual sites. These impacts have degraded the land, disrupted traditional use, and undermined our ability to exercise our Aboriginal and Treaty rights.</p> <p>Based on these experiences, GFN is</p>	<p>Marten Falls First Nation continues to engage in discussions with the Province regarding the ownership and future operations of the Community Access Road. At this stage of the process, Marten Falls First Nation is not in a position to commit to restricting access to the Community Access Road. Access and ownership including gates is outside the scope of the EA/IS and will require further dialogue between the communities and the Province.</p>	<p>Comment noted; see response for details.</p>	762

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>deeply concerned that the MFCAR could result in similar outcomes if unrestricted public access is permitted. While we understand that current plans indicate some level of control, we have serious concerns about the long-term feasibility of maintaining those restrictions once the road is built. Without enforceable and permanent access management measures, there is a high risk that the road will open the region to broader development pressures and increased non-Indigenous land use that is not aligned with the values or priorities of First Nations in the area.</p> <p>GFN recommends that gates be installed at both the southern and northern ends of the MFCAR, and the road must be actively administered by MFFN, Aroland and GFN to prevent unauthorized entry.</p>			
Ginoogaming First Nation	15	<p>GFN has a long history of being impacted by industrial development within our traditional territory without receiving meaningful benefits in return. Past projects, including forestry, hydroelectric development, and road construction, have resulted in loss of access, environmental degradation, and cultural disruption. Despite these impacts, GFN has not been included in</p>	<p>Ginoogaming First Nation's request for shared ownership, decision-making and economic participation in the Project is noted.</p> <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</p>		778

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>long-term planning, nor have we received economic or governance benefits proportional to the burdens carried by our community.</p> <p>If the MFCAR ultimately becomes a key access route to the Ring of Fire, GFN has serious concerns about once again bearing the impacts of development while being excluded from the benefits. The construction of this road will permanently alter a relatively untouched area of our traditional lands. GFN must not be left on the margins of decisions that shape its use and purpose.</p> <p>GFN requests that planning for the MFCAR includes mechanisms for shared ownership, decision-making, and economic participation that involves GFN alongside Aroland and Marten Falls. If the road becomes a gateway to the Ring of Fire, GFN should have a clear role in its governance, including the ability to co-manage access and collect tolls or revenues from industrial users.</p>	<p>consultation with Indigenous communities will continue in 2026 under the coordination of the regulator.</p>		
Ginoogaming First Nation	16	<p>The road has the potential to increase social harms such as the influx of drugs, alcohol, and trafficking—particularly in remote Indigenous communities. These</p>	<p>The potential for increased social harms—such as substance use and human trafficking—in remote Indigenous communities is a serious concern.</p>	<p>Comment noted; see response for details.</p>	779

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>impacts were strongly raised by community members but are not adequately addressed in the EA/IS.</p> <p>The Proponent, with support from Canada and Ontario, should work with GFN to develop a Social Impact Monitoring and Response Strategy, including funding for culturally appropriate prevention programs, enhanced Indigenous policing capacity, and community support services.</p>	<p>Appendix T Community Well-Being Technical Support Document discusses isolation and substance use in Section 5.1.8, and proposes mitigation and enhancement measures during construction in Section 7.1.1.34, and proposes a monitoring program in Section 9.2. Human Trafficking concerns are discussed in Section 5.1.12.</p> <p>As outlined in Section 13.1.4, these concerns have been addressed in the Final EA/IS. We have also proposed mitigation measures, including the development of safety protocols and an anti-human trafficking plan. The commitments made through the EA/IS process are documented and will form part of the project’s approval conditions. These commitments will be confirmed and further refined during the detail design phase.</p> <p>As noted in Ginoogaming First Nation Aboriginal and/or Treaty Rights and Interests Report, Marten Falls First Nation proposes to collaborate with local existing environmental advisory committees to support the development and implementation of all environmental monitoring programs. The objective is to ensure the inclusion of Indigenous</p>		

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
			<p>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 GFN will be established.</p>		
Ginoogaming First Nation	17	<p>GFN has confirmed that burial sites are located within or near the proposed MFCAR corridor. These areas are of deep cultural and spiritual significance. The EA/IS fails to adequately identify or protect these sites and does not reflect GFN's protocols or rights regarding ancestral remains. Proceeding without clear measures to avoid and respect these sites would be a profound violation of GFN's cultural values and Treaty and Aboriginal rights.</p> <p>The Proponent must work directly with GFN Elders, Knowledge Holders, and lands staff to identify the location and extent of all known and suspected burial sites in the project area. These sites must be fully avoided through route realignment or protective setbacks. No ground disturbance should occur in these areas without the direct participation and ceremonial guidance of GFN.</p>	<p>We acknowledge Ginoogaming First Nation's concerns regarding burial sites within or near the Community Access Road.</p> <p>When the archaeological assessment reports for the Community Access Road were prepared, Indigenous Knowledge from Ginoogaming First Nation related to these burial locations was not yet available. As further archaeological assessments will be required for the Community Access Road, available Indigenous Knowledge from Ginoogaming First Nation will be incorporated at that time.</p> <p>Should the Final EA/IS for the Community Access Road be approved to proceed, a consultation and engagement program will be established to guide discussions through detail design, including with Ginoogaming First Nation.</p>	Comment noted; see response for details	780

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
Ginoogaming First Nation	18	<p>The current monitoring program for sedimentation control is insufficient because there is only mention of monitors being present prior and during construction of the MFCAR.</p> <p>GFN urges the Proponent to have a monitoring team evaluate streams for sedimentation and turbidity after the first 2 rainfalls, as loose gravel and sediment from newly graded roads are more prone to runoff during heavy precipitation events. It's imperative to have benchmark measurements for turbidity and percentage of fine sediment before road construction begins. For turbidity, a common water quality probe (i.e. YSI) will suffice, while a fine sediment analysis is recommended for determining baseline substrate composition.</p>	<p>Turbidity and suspended solids (sedimentation) will be monitored according to the requirements of the anticipated Fisheries and Oceans Canada (DFO) and Ministry of Natural Resources (MNR) permits to determine sediment control measures are effective. Turbidity and suspended solids (sedimentation) monitoring will follow the Canadian Council of Ministers of the Environment's Canadian Water Quality Guidelines for the Protection of Aquatic Life (CCME, 1999). Turbidity will be measured using a water quality meter and samples will be collected for laboratory analysis of total suspended solids and are expected to be requirements of the anticipated DFO and MNR permits. Timing of monitoring and baseline characterization will be determined during monitoring plan development during the detail design and permitting phase of the project.</p>	Comment noted; see response for details	781
Ginoogaming First Nation	19	<p>The report primarily discusses benthic macroinvertebrate collection using kick netting in water crossings with smaller substrates such as cobble, gravel, fine sediments, and organic matter. However, it does not mention any assessment of benthic invertebrates in habitats with larger substrates like boulders, bedrock,</p>	<p>Benthic invertebrate assessments were completed in accordance with Ontario Benthic Biomonitoring Network: Protocol Manual (Jones et al., 2007) and are described in Appendix G Fish and Fish Habitat Technical Support Document. The provincial protocol manual (Jones et al., 2007) is considered rigorous and</p>	Comment noted; see response for details.	782

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		<p>and larger cobble.</p> <p>A. GFN recommends that benthic invertebrate studies be conducted at water crossings where larger substrate was present.</p> <p>B. A common practice used in the Canadian Aquatic Biomonitoring Network when investigating invertebrate richness is to use the rock grab method. 100 coarse rocks (selected at random) are lifted and inspected. Documenting macroinvertebrate counts and species diversity for these habitat types is imperative for gathering a holistic understanding of benthic invertebrates across the project's watersheds. GFN recommend that the Proponent employ the rock grab method as part of the benthic invertebrate baseline monitoring program.</p>	<p>protective of the environment and appropriate for use in this assessment.</p> <p>A: Sampling sites were selected to target representative waterbody types and habitat to provide a baseline of diversity and abundance. Site selection considered factors such as flow and thermal regime, watershed representation and waterbody type, and health and safety and logistical constraints. Sampling sites were generally located in moderate to large watercourses, in slow flowing depositional environments with substrates composed predominantly of fine sediments and organics which was consistent across the route alternatives. A small proportion of sites were classified as erosional habitat, dominated by coarse substrates (2 of 17 stations in Route Alternative 1 and 6 of 16 stations in Route Alternative 4).</p> <p>B: Benthic invertebrate community samples were collected following Ontario Benthic Biomonitoring Network: Protocol Manual (Jones et al., 2007) using one of two pieces of equipment:</p> <ul style="list-style-type: none"> • In lotic / erosional environments (i.e., watercourses with predominantly coarse substrates), samples were collected 		

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			<p>using a Surber sampler (sample area = 0.093 square metres [m²]) where there were suitable coarse substrates (i.e., cobble or boulder); and</p> <ul style="list-style-type: none"> • In lentic / depositional environments (i.e., waterbodies with sediments that are predominantly silt / sand), samples were collected using a grab sampler (i.e., Ekman or petite Ponar) (sample area = 0.023 m²). <p>The Surber method is the standard for benthic collection in Ontario as outlined in the Ontario Benthic Biomonitoring Network: Protocol Manual (Jones et al., 2007). The "rock grab" method originated from the US EPA's Rapid Bioassessment Protocols and is not considered part of Ontario Benthic Biomonitoring Network: Protocol Manual (Jones et al., 2007).</p>		
Ginoogaming First Nation	20	<p>GFN reviewed the desktop information available in the EA/IS and Appendix B (Route Selection Methodology) evaluated the alternative routes. From this information, a route was selected that would reduce the overall length of road in proximity to watercourses, limit the number of watercourse crossings, and reduce the overlap with existing provincial parks or other sensitive areas. Based on the information provided, it appears the preferred route would be:</p>	<p>A: We appreciate Ginoogaming First Nation's general support for the Preferred Route. The design of the Community Access Road will be further refined during the detail design phase. Should the Community Access Road EA/IS be approved to proceed, a consultation and engagement program will be established to guide discussions through detail design.</p> <p>B: The Final EA/IS was conducted on the</p>	<p>Comment noted; see response for details.</p>	783

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		<ul style="list-style-type: none"> • Alternative 1 for southern section (Segment 1) • Alternative 4 for central section (Segment 2) • Alternative 4 for northern section (Segment 3) <p>For greater clarity, this would involve constructing using the following segment node pathway: B>E>F>G>H>I>J</p> <p>This route aligns with the Preferred Route (Figure ES 4-1 and Figure 4-7) selected by the Proponent.</p> <p>A. Based on the information provided, GFN is generally supportive of the approach taken for determining the Preferred Route and the route itself. However, there must be an opportunity for further refinement of the preferred route. For example, the route could be adjusted slightly to minimize proximity to watercourses and identify preferred crossing locations. For this reason, GFN requests that the Proponent invite GFN to provide input on the final route. We are open to how this can be achieved, for example, written correspondence, community meetings, and/or workshops.</p> <p>B. Secondly, GFN requests clarification on the flexibility to modify the Preferred</p>	<p>Project Study Area as shown on Figure ES 4-1 of the Final EA/IS. As stated in Section 6.5.2 of the Final EA/IS the Local Study Area consists of a corridor area 2.5 km from the centreline. Minor adjustments within the area are generally permissible during detail design within the Construction Disturbance Area. However, any significant deviation beyond it may require additional assessment and regulatory review. It should be noted that there are currently no plans for the Preferred Route to be outside the Construction Disturbance Area.</p>		

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Route once the EA/IS is complete. For example, will it be possible to choose a route outside of the 100 m Right of Way?			
Ginoogaming First Nation	21	<p>The Proponent has only completed detailed fish habitat, fish community sampling, and benthic invertebrate sampling at a subset of 50% (55 locations), 50% (46 locations), and 25% of proposed watercourse crossings, respectively. These were completed in 2019-2022. Fish sampling was conducted primarily with backpack electrofisher and minnow traps.</p> <p>This level of effort is far below what is considered best practice. It is typical to conduct multi-season multi-year baseline studies to adequately characterize natural variability and the habitat use by different species based on their unique life histories.</p> <p>GFN requests additional baseline sampling to adequately characterize the aquatic habitat within the LSA. While multi-season sampling at each location is standard, it is recognized that the potential impacts of road are well understood and can be managed with appropriate mitigation measures. Therefore a more practical approach</p>	<p>Fish and fish habitat field investigations were conducted in accordance with the Draft Fish and Fish Habitat Study Plan (AECOM 2001) which outlines the percentages of sites to be surveyed as well as seasonal considerations. A copy of the study plan and regulatory review comments on the study plan are included in Attachment A in Appendix G Fish and Fish Habitat Technical Support Document.</p> <p>As indicated in Section 9 of Appendix G Fish and Fish Habitat Technical Support Document, fish and fish habitat, and surface water surveys will be conducted before construction on any waterbody that has not been assessed. Additional surveys will be conducted below high-water mark to meet anticipated permitting requirements (i.e., Fisheries and Oceans Canada (DFO) Request for Review under the Fisheries Act, permit applications to the Ministry of Natural Resources under the Lakes and Rivers Improvement Act).</p>	Comment noted; see response for details.	784

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>would be to complete a minimum of one baseline sampling event to characterize detailed fish habitat characteristics at all crossing sites of the selected route, in advance of construction (i.e. not just the 50% subset). Of these, areas with high potential for high value habitat (of the selected VC species) should be targeted for fish community sampling as well. This sampling can occur as part of pre-construction monitoring and is not required for completion of the Impact Assessment.</p>			
Ginoogaming First Nation	22	<p>The Proponent has not presented any detailed mapping information on locations of spawning habitats for the selected fish VCs. In particular, the absence of thorough assessments of spawning habitat for lake sturgeon (<i>Acipenser fulvescens</i>) and brook trout (<i>Salvelinus fontinalis</i>) presents a significant concern. Both species rely on specialized environmental conditions for successful reproduction, including specific substrate types, water temperature ranges, flow dynamics, and oxygen levels. Without proper evaluation and identification of these habitats, several risks arise, including the possibility of degrading and/or destroying those habitats which may overlap with</p>	<p>Habitat information was collected at each of the crossing locations surveyed as described in Section 2.2.1 of Attachment B in Appendix G Fish and Fish Habitat Technical Support Document. Habitat potential for spawning for fish species, such as lake sturgeon (<i>Acipenser fulvescens</i>) and brook Trout (<i>Salvenlinus fontinalis</i>) were considered and described during surveys. A summary of spawning habitat potential is included in the Final EA/IS in Section 3.3 of Attachment B in Appendix G Fish and Fish Habitat Technical Support Document.</p> <p>As indicated in Section 9 of Appendix G Fish and Fish Habitat Technical Support</p>	Comment noted; see response for details.	785

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>crossings.</p> <p>GFN recommends that additional efforts be undertaken to evaluate all crossings with potential spawning habitat for lake sturgeon and brook trout. This information should be presented in the EA/IS. Then based on this information, the identification of crossing locations can be optimized to avoid any impacts to spawning areas.</p>	<p>Document, fish and fish habitat, and surface water surveys will be conducted before construction on any waterbody that has not been assessed. Additional surveys will be conducted below high-water mark to meet anticipated permitting requirements (i.e., Fisheries and Oceans Canada (DFO) Request for Review under the Fisheries Act, permit applications to the Ministry of Natural Resources under the Lakes and Rivers Improvement Act).</p>		
Ginoogaming First Nation	23	<p>The Proponent has stated that an Erosion and Sediment Control Plan will be developed for the Project. This is a critical measure that must be rigorously developed and implemented to adequately mitigate the potential impacts of the road.</p> <p>GFN requests the opportunity to review and provide input on the Erosion and Sediment Control Plan once available.</p>	<p>The Erosion and Sediment Control Plan will be shared with Ginoogaming First Nation. The development and implementation of the Erosion and Sediment Control 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>	Comment noted; see response for details.	786
Ginoogaming First Nation	24	<p>The Proponent states that there will be at least 45 major waterbody crossings along the Preferred Route. This includes 13 culverts, 22 clear-span bridges, and 10 multi-span bridges along permanent crossings. For temporary access roads, there will be 24 temporary waterbody</p>	<p>The Erosion and Sediment Control Plan will be developed during detail design and will include site-specific plans for all watercourse crossings to address setback distances, ice-damming and erosion.</p>	Comment noted; see response for details.	787

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>crossings, including 6 culverts, 12 clear-span bridges, and 6 multi-span bridges.</p> <p>However, there is not sufficient details on crossing types and whether they will require site-specific mitigation measures. Given the potential risk of erosion and sedimentation at these important points, there must be additional information on watercourse crossings. This is especially important for areas with potential spawning habitat of all VCs, potential for lake sturgeon, or other environmental sensitivities.</p> <p>GFN requests additional information on existing crossings and whether there is a need for site-specific mitigation measures to limit the effects of sedimentation and erosion. For example, it is not clear whether existing crossings provide adequate freeboard or setback distances to avoid effects to watercourse banks and/or prevent ice-damming and associated erosion.</p> <p>Where necessary, the Erosion and Sediment Control Plan should include site-specific plans for sensitive watercourse crossings.</p>			
Ginoogaming	25	The Proponent has stated crossings will	As described in Section 7.3.1.1.2 of	Comment	788

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
First Nation		<p>be constructed in a “manner that maintains downstream flows and fish passage”. However, there has been no assessment of minimum/maximum velocities/depths required at crossings to maintain fish passage based on species present. Further, there is not adequate discussion on how sizing of crossings will be planned.</p> <p>Ensuring that watercourse crossings are adequately designed (e.g. to meet depth and flow velocity requirements) is essential for maintaining fish passage and reducing potential effects of erosion and sedimentation. Many fish species rely on specific water conditions to migrate, access spawning habitats, and complete their life cycles. If crossings create barriers—such as shallow water, excessive velocity, or obstructions—fish may struggle to move upstream or downstream, leading to habitat fragmentation. Properly designed crossings mimic natural stream conditions, allowing fish to navigate safely while preserving biodiversity and habitat connectivity.</p> <p>GFN requests that the Proponent include a commitment that crossings installed will ensure that minimum/maximum flow</p>	<p>Appendix G Fish Habitat Technical Support Document, site-specific fish and fish habitat, and surface water surveys will be completed during detail design to support engineering and permitting (i.e., Fisheries and Oceans Canada (DFO), Ministry of Natural Resources (MNR)) at water crossings where work below the high water mark is proposed. During the detail design, the bridge and culvert designs for each crossing (temporary and permanent) will be developed. Water crossings will be designed in accordance with regulatory requirements and design standards. Designs of water crossings will be submitted as required in DFO and MNR permit applications.</p>	<p>noted; see response for details.</p>	

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>velocities and depths will be maintained to ensure adequate fish passage for the species present at each crossing. Where possible, this should include:</p> <ul style="list-style-type: none"> • Ensuring crossings are adequately sized to pass normal range of water (i.e. 1000-year return period for permanent crossings, and 10-year return period for temporary crossings). • Use open-bottom structures or embedded culverts wherever possible to allow natural sediment transport and habitat continuity. • Design crossings to maintain adequate water depth and manageable flow velocities to support fish passage. • Avoid excessive water speeds that could impede movement, particularly for juvenile or species with low burst speeds. 			
Ginoogaming First Nation	26	<p>The Proponent has identified that rock bass and smallmouth bass have been documented in the Albany River and some other locations with the RSA. They have stated that they will “Implement best management practices and regulations outlined by the Ministry of Natural Resources to reduce the spread of invasive species” (Table 9-10). However, they have otherwise not assessed the potential impacts of invasive species on aquatic ecosystems</p>	<p>A: Potential pathways of introduction and potential impacts of aquatic invasive species were assessed as part of the potential project effects and residual effects in Section 7 of Appendix G Fish and Fish Habitat Technical Support Document. The introduction of invasive species with increased public access was recognized and identified as a potential effect (i.e., effect before mitigation). The spread of aquatic invasive species from the Project was</p>	<p>Comment noted; see response for details.</p>	789

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>or meaningfully planned any associated mitigation measures. This is a significant oversight.</p> <p>Northern Ontario's aquatic ecosystems remain relatively unimpacted by invasive species, providing native fish populations with stable environmental conditions. However, the construction of new roads in the region may inadvertently introduce aquatic invasive species, posing a serious threat to local biodiversity and ecosystem health. Construction and subsequent road use may lead to the unintentional transport of invasive species via contaminated equipment, vehicles, or recreational activities. Once established, aquatic invasive species are difficult and costly to remove, requiring ongoing mitigation and control effort.</p> <p>A. GFN requires that the Proponent evaluate the potential pathways of introduction and potential impacts of aquatic invasive species as part of the EA/IS.</p> <p>B. The Proponent must prepare an invasive species management plan that includes details on how they plan to prevent and manage the accidental introduction of invasive species through all phases of the Project.</p>	<p>captured in the residual effects assessment for increased public access to recreational fishing areas (Section 7.3.2.8 of Appendix G).</p> <p>B: 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. The development of an Invasive Species Management Plan is not a regulatory requirement and as such was not developed as part of the Environmental Assessment / Impact Statement. Protocols for the prevention of aquatic invasive species introduction and spread during construction will be developed by the contractor and included in the Project-specific Environmental Protection Plan (EPP). A key mitigation to reduce the potential spread of invasive species to be included in the EPP is to follow best management practices and the regulations outlined by the Ministry of Natural Resources (e.g., Invasive Species Act) to reduce the spread of invasive species.</p> <p>C. The EPP will be shared with</p>		

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>C. The Proponent should share this plan with the GFN for review and comment prior to finalization or approval.</p> <p>D. The Proponent should support the establishment of a regional road invasive species subcommittee that includes GFN and other impacted Nations. This body should coordinate monitoring, prevention protocols, and response measures across all road-linked developments in the region to address the cumulative risk of invasive species introduction and spread</p>	<p>Ginoogaming First Nation.</p> <p>D. As noted in Ginoogaming First Nation 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 Ginoogaming First Nation will be established.</p>		
Ginoogaming First Nation	27	<p>The layout for Table 9-10 is confusing and makes understanding the information difficult. There are many items that are duplicated, except for the final column. For example, the first two items appear identical (Table 9-10 pp 407 and Table 9-10 pp 410), with the exception of the predicted residual effect. It appears that the difference here is between the project activities being evaluated (above high water mark and</p>	<p>A. Table 9.3-7 in the Final EA/IS is a high-level summary of the fish and fish habitat assessment. Full details are provided in Appendix G Fish and Fish Habitat Technical Support Document.</p> <p>- Activities and effects considered are provided in Appendix G, Table 7-4: Project–Environment Interactions.</p> <p>- Mitigation and enhancement measures are provided in Appendix G, Table 7-5:</p>	Comment noted; see response for details.	820

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>below high water mark) but that is only clear when looking at the residual effect.</p> <p>GFN notes that such lack of clear communication of the critical information in the EA/IS may be construed as making the findings deliberately difficult to interpret and thus avoid proper scrutiny of the Project.</p> <p>A. GFN requests that Table 9-10 be updated to improve clarity on what project activities are being considered. Potential improvements include;</p> <ul style="list-style-type: none"> • Adding additional description to clarify the activities and/or effects being considered (e.g. include description about whether the effect is above or below the high water mark) • List mitigation and enhancement measures in a separate table with associated numbers for each. This will help avoid the duplication of text in the table. <p>B. Similar updates should be made to the tables for all valued components of the project.</p>	<p>Summary of Potential Effects, Mitigation and Enhancement Measures, and Predicted Residual Effects on Fish and Fish Habitat.</p> <p>- A summary of the results of the residual effects characterization and determination of significant is provided in Table 7-6: Characterization of Predicted Residual Effects and Determination of Significance for Fish and Fish Habitat Valued Components.</p> <p>B. Additional clarity on the project activities, effects, mitigations and enhancement measures for each valued components can be found in the Technical Support Documents.</p>		
Ginoogaming First Nation	28	The Proponent has identified that they will “Avoid placing soil stockpiles near waterbodies or drainage features” (Table 9-30, pp 667). However, this language is	The Final EA/IS has been updated to include the mitigation that soil stockpiles will be located more than 100 m from watercourses.	Final EA/IS Table 9.3-7	821

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>vague and is not a useful measure for planning (or for contractors in the future). As stockpiles of overburden and soils are an important source of sediment, it is important that there is a sufficient setback/buffer to prevent potential erosion and sedimentation, especially during periods of high rainfall and/or melting snow.</p> <p>GFN requests that excavated materials and stockpiles be placed at a minimum distance of 100m from watercourses. Furthermore, efforts should be made to ensure that stockpiles are covered, revegetated, or otherwise stabilized prior to spring freshet. This should be included as a mitigation measure in Table 9-10</p>	<p>Detailed soil management and soil handling procedures, including erosion and sediment control will be developed during the detail design phase.</p>		
Ginoogaming First Nation	29	<p>Similarly to the comment noted above, the Proponent has stated that they will “Locate temporary access roads, staging areas, camps, and debris and / or timber stockpiles a minimum of 30 meters away from the ordinary high-water mark of a waterbody, where possible” (Table 9-10 pp 408). One of the major potential impacts of the Project during construction is the risk of sediment and erosion from stockpiles, camps, and staging areas. It is important that there is a sufficient setback/buffer to prevent potential</p>	<p>The 30 m setback from the ordinary high-water mark was selected based on the Ontario Provincial Standard Specification (OPSS.PROV 182) General Specification for Environmental Protection for Construction In and Around Waterbodies and on Waterbody Banks (OPSS 2021). The recommended riparian buffer to maintain aquatic resources and functions varies in literature; however, a 30 m riparian buffer is considered sufficient to reduce or avoid effects on bank stability, maintain benthic communities, and</p>	<p>Comment noted; see response for details.</p>	822

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>erosion and sedimentation, especially during periods of high rainfall and/or melting snow.</p> <p>GFN requests that a minimum distance of 100m from watercourses be applied to all temporary camps, staging areas, and stockpiles of overburden, aggregates, and soil. Furthermore, efforts should be made to ensure that stockpiles are covered, revegetated, or otherwise stabilized prior to spring freshet. This should be included as a mitigation measure in Table 9-10.</p> <p>It is understood that temporary access roads, debris, and timber stockpiles may need to be within 30 m, therefore the 30m buffer for those activities may be appropriate, depending on the circumstances.</p>	<p>protect fish habitat as outlined in How Much Habitat is Enough? Third Edition. (Environment Canada, 2013), Shoreline Vegetative Buffers (The District of Muskoka Planning and Economic Development Department, 2003) and the references cited within. During detail design phase, the riparian buffer may be increased around certain waterbodies with a high slope if it is determined to be suitable or necessary to protect the waterbody from sediment mobilization.</p>		
Ginoogaming First Nation	30	<p>The EA/IS assesses forests through a biophysical lens only and fails to recognize the special cultural, ceremonial, and spiritual importance of old-growth forests to GFN.</p> <p>A. The Proponent must identify and map old-growth forest areas within the vegetation study area.</p>	<p>We acknowledge Ginoogaming First Nation’s concern regarding the EA/IS’s limited recognition of the cultural, ceremonial, and spiritual importance of old-growth forests.</p> <p>Unfortunately, forest age data were not available for the Local Study Area, therefore old-growth forest areas and associated impacts could not be</p>	Comment noted; see response for details	823

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>B. The Proponent must assess impacts to old growth forests specifically in the residual effects assessment.</p>	<p>assessed for the Community Access Road.</p>		
<p>Ginoogaming First Nation</p>	<p>31</p>	<p>The project will result in the direct loss of approximately 116.7 hectares of riparian vegetation—1% of riparian ecosystems within the Regional Study Area. Although this may seem numerically small, riparian areas provide disproportionately important ecosystem services making them uniquely important.</p> <p>These areas are especially sensitive to disturbance, and even those portions that remain physically intact may experience functional degradation as a result of adjacent clearing and fragmentation. As noted in the assessment, the loss of riparian area could reduce the ability of the remaining ecosystems to carry out their natural functions, emphasizing the need for stronger commitments to protection, restoration, and longterm monitoring.</p> <p>The Proponent proposes to “limit clearing of riparian vegetation (within 30 metres of waterbodies) to the extent possible and to the requirement of the access road and alignment clearing width only.” This measure is entirely based on avoidance</p>	<p>A: The Final EA/IS has been updated to include Appendix AB Preliminary Biodiversity Offset Plan. The Preliminary Biodiversity Offset Plan will be finalized during detail design.</p> <p>B: Vegetation clearing will be limited within 30 m of waterbodies to the extent possible and to the requirement of the access road and alignment clearing width only.</p> <p>C: The Final EA/IS has been updated to include a commitment to develop a Vegetation Restoration Plan during detail design phase which will include a monitoring and adaptive management framework, as well as performance benchmarks and thresholds to trigger corrective actions, as recommended.</p>	<p>Final EA/IS Table 9.4-7</p>	<p>824</p>

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>and minimization during the construction design process. Avoidance does not address the residual loss of ecological function, nor does it ensure that disturbed areas will recover.</p> <p>A. The Proponent must commit to offsetting residual functional losses to riparian ecosystems through the adoption a no-net-loss approach—an established ecological principle that seeks to ensure that the total area and function of a habitat type are maintained or enhanced over time. In practice, this means that when impacts to a habitat cannot be entirely avoided or fully restored, they must be offset through equivalent or greater ecological gains elsewhere.</p> <p>B. The Proponent should commit to limiting clearing of vegetation within 100m of waterbodies.</p> <p>C. The Proponent must strengthen the monitoring and adaptive management framework within the Vegetation Restoration Plan to ensure riparian ecosystem recovery. A long-term, riparian-specific monitoring program must be included in the Vegetation Restoration Plan. Performance benchmarks must be clearly defined, and</p>			

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>thresholds should be set to trigger corrective actions if restoration is not proceeding as expected. Without measurable outcomes and adaptive management, even small-scale clearing could result in lasting degradation of riparian function, contrary to the goals of ecological integrity and no-net-loss.</p>			
Ginoogaming First Nation	32	<p>The project currently falls outside the regulated zone for Black Ash (<i>Fraxinus nigra</i>) established under Ontario Regulation 6/24 (Endangered Species Act, 2007); however, the proposed project creates a clear and significant pathway for the introduction of invasive species, especially the Emerald Ash Borer (<i>Agrilus planipennis</i>). Construction activities such as equipment mobilization, timber handling, and increased public access along the permanent access road increase the risk of Emerald Ash Borer being introduced into areas where it is not yet present.</p> <p>The risk is magnified by the permanent nature of the road, which facilitates ongoing vehicle movement and human activity into relatively intact northern ecosystems. Furthermore, the Emerald Ash Borer's known range has been</p>	<p>A. We acknowledge the cultural significance of Black Ash (<i>Fraxinus nigra</i>) and the potential impacts from the introduction of Emerald Ash Corer (<i>Agrilus planipennis</i>).</p> <p>B. The Final EA/IS has been updated to include Emerald Ash Borer prevention and long-term surveillance.</p> <p>C. The Final EA/IS has been updated to include a commitment to developing a Vegetation Management Plan during detail design which will include Black Ash-specific protocols.</p>	Final EA/IS Table 9.4-7 Appendix J Section 7.3.1	825

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>steadily expanding northward, and this trend is expected to continue as shorter, milder winters and increased growing degree days under climate change create conditions suitable for the insect's survival and reproduction in more northern latitudes. As overwintering mortality declines and thermal thresholds are increasingly met, the pest's establishment risk in currently unaffected regions grows significantly over the lifespan of this project.</p> <p>Importantly, Black Ash holds deep cultural significance for Indigenous communities, particularly in basketry and traditional knowledge practices. The loss of Black Ash due to Emerald Ash Borer infestation would not only have ecological consequences but would also represent a profound cultural and intergenerational loss for communities that rely on this species for cultural expression, education, and identity.</p> <p>The current mitigation measures—limited to re-evaluating Black Ash status under future regulatory updates and conducting localized surveys if its listing changes—are reactive and insufficient given the foreseeable threat trajectory.</p>			

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>A. The Proponent must recognize and proactively manage Black Ash as a culturally significant and ecologically vulnerable species, regardless of current regulatory status.</p> <p>B. The Proponent must integrate Emerald Ash Borer prevention and long-term surveillance into invasive species mitigation.</p> <p>C. The Proponent must update the Vegetation Management Plan to include Black Ash-specific protocols that reflect both its cultural value and the emerging ecological risks.</p>			
Ginoogaming First Nation	33	<p>The Environmental Assessment acknowledges that the project will result in a permanent loss of approximately 4,700 hectares of wolverine habitat and indirect alteration to an additional 189,145 hectares through habitat fragmentation, sensory disturbance, and edge effects. Despite concluding that the net residual effect on wolverines is significant, the current mitigation strategy does not include any offsetting or compensation to address this large-scale, irreversible loss.</p>	<p>A: The Final Environmental Assessment / Impact Statement has been updated to include Appendix AB Preliminary Biodiversity Offset Plan which includes a plan for offsetting the loss of wolverine habitat and indirect alteration of additional habitat through habitat fragmentation, sensory disturbance, and edge effects. A long-term monitoring plan will also be included to validate success of the offsetting measures. The Preliminary Biodiversity Offset Plan will be finalized during detail design phase.</p>	<p>Comment noted; see response for details.</p>	826

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>Furthermore, the proposed mitigation measures remain focused on localized, site-specific actions—such as timing restrictions near active dens and general reclamation of temporary features—but fail to incorporate a landscapescale or connectivity-based approach. Wolverines are wideranging, low-density carnivores that depend on expansive, connected tracts of intact habitat. The construction and operation of a permanent road corridor introduces long-term fragmentation, potential barriers to movement, and increased vulnerability to cumulative stressors. However, the assessment does not identify or protect key movement corridors, nor does it propose any measures to maintain or restore regional habitat connectivity.</p> <p>Without compensating for the permanent loss of core habitat and planning for long-term landscape permeability, the project risks contributing to the functional isolation of wolverine populations and undermining regional conservation objectives for this sensitive species. The absence of offsetting and connectivity planning represents a significant gap in the mitigation strategy for a species already facing pressure from habitat fragmentation across its southern range.</p>	<p>B: As noted in Ginoogaming First Nation 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 Ginoogaming First Nation will be established.</p>		

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>A. The Proponent must commit to habitat offsetting to compensate for the permanent loss of 4,700 hectares of core habitat. The offsetting strategy should be informed by a regional connectivity assessment to ensure that compensation efforts support landscape-level ecological function and align with known wolverine movement corridors. The connectivity assessment should also include maintaining permeability across the road corridor through measures such as wildlife overpasses, or underpasses informed by local and regional wolverine movement data.</p> <p>B. GFN would like to have input into the development of the biodiversity offsetting and compensation plan, specifically regarding wolverine habitat restoration and connectivity. Our Nation has important knowledge to share about the land and would like to be involved in planning how habitat will be restored and protected over the long term.</p>			
Ginoogaming First Nation	34	The assessment of increased public access as a pathway for wolverine mortality contains several key flaws and understatements that diminish the importance of this effect. While the	A. The assessment in the Final EA/IS acknowledges that impacts to wolverine from increased public access is permanent and continuous in frequency during the operation and maintenance	Comment noted; see response for details.	827

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>residual effect is described as “not significant,” the assessment itself acknowledges that the duration is permanent, the reversibility is irreversible, and the likelihood of impact is possible. Despite these admissions, the frequency is incorrectly characterized as “continuous until the Construction Phase is over,” which contradicts the permanent nature of the road and its associated access infrastructure.</p> <p>Additionally, the conclusion of “not significant” fails to adequately account for the vulnerability of wolverines to human encroachment and incidental trapping. As a wideranging, low-density species already subject to multiple project stressors (e.g., habitat loss, fragmentation, den disturbance), even low levels of increased mortality from trapping could have population-level consequences (Scrafford et al. 2025) (Krebs et al. 2004), particularly in the absence of population monitoring.</p> <p>A. The Proponent should revise the assessment to acknowledge that increased public access and its associated impacts on wolverine are permanent in duration and ongoing in frequency, not limited to the construction</p>	<p>phase. No revision is warranted.</p> <p>B. Although the different residual effects are assessed separately (i.e., habitat loss and alteration, sensory disturbance, increase in public access), and each effect is assessed for significance, the overall assessment of the project on wolverine was assessed as significant. We acknowledge that even a small increase in mortality may have a significant effect on the sustainability of the regional wolverine population. Our assessment concluded that mortality from collisions with vehicles will have a moderate magnitude compared to a low magnitude from increased public access.</p> <p>C. We appreciate the recommended mitigation measures provided.</p> <p>Trap-Free Buffer Areas and Trap Design: It is acknowledged that trap-free buffer areas around sensitive wolverine habitat, and the requirement for modified traps to reduce incidental capture of wolverines may be effective mitigation measures for minimizing an increase in wolverine mortality resulting from an increase in public access. The decision to implement special regulations on trapping including trap-free buffer zones,</p>		

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>phase.</p> <p>B. Given the species' sensitivity to human disturbance and the cumulative effects of habitat loss and fragmentation, the residual effect should be reevaluated as significant.</p> <p>C. The following measures to mitigate for the residual effect of increased public access should be incorporated into the project to protect the regional wolverine population:</p> <ul style="list-style-type: none"> • Establish designated trap-free buffer zones around key wolverine habitats, movement corridors, and denning areas in consultation with local first nation trappers. • Require use of modified trap designs or exclusion devices that reduce risk of incidental capture of wolverines in areas where trapping remains permitted. • Implement a program to monitor wolverine presence, movements, and mortality incidents using remote cameras, genetic sampling, and collaring where feasible. • Develop a centralized system to report and analyze all known or suspected mortalities (e.g., trapping, roadkill) in cooperation with local first nation communities, trappers, and enforcement 	<p>the requirement for modified trap designs or exclusion devices is the responsibility of the Ministry of Natural Resources to be made in consultation with the Indigenous communities.</p> <p>Monitoring: As noted in Ginoogaming First Nation 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 Ginoogaming First Nation will be established.</p> <p>Centralized Reporting System: As described in Section 9 of Appendix K, reporting protocols for wildlife-vehicle collisions and incidental observations of Species at Risk will be developed and incorporated into the Environmental Protection Plan.</p>		

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>agencies.</p> <ul style="list-style-type: none"> • Install wildlife crossing structures (e.g., underpasses, overpasses) at known or modeled crossing points of the road to reduce barrier effects and collision risk. • Establish clear mortality thresholds that, if exceeded, would trigger enhanced mitigation or project operational changes. 	<p>Wildlife Crossing Structures: Discussions are ongoing regarding potential modifications to the preliminary engineering design to facilitate safe wildlife crossing and final decisions will be made during detail design. As wolverine are known to use watercourses and waterbodies as travel corridors, many of the site specific design mitigations for the road are associated with watercourse crossings to accommodate movement of wildlife and maintain some habitat connectivity under the road.</p>		
Ginoogaming First Nation	35	<p>Table 9-22: Summary of Residual Effects for Wildlife - Furbearers (Beaver)</p> <p>The EA/IS does not include a strategy for addressing potential beaver-related conflicts at culverts, bridges, or other water control structures. While incidental take procedures are outlined and active lodges will be flagged during construction, the plan does not anticipate or address the high likelihood of damming activity at culverts, which is a common and predictable outcome in beaver-inhabited landscapes. Without a proactive conflict management strategy, this gap may lead to future flooding,</p>	<p>Mitigations to address potential beaver conflicts related to culverts, bridges or other water crossing structures are described in Section 7.3.1.5.4.2 of Appendix K Wildlife Technical Support Document of the Final EA/IS. Mitigations include:</p> <ul style="list-style-type: none"> - appropriate screening of culverts to prevent access by beavers - regular monitoring of water crossings for beaver activity - early removal of log jams from crossings and nearby waterways <p>As described in Section 9.4 of Appendix K Wildlife Technical Support Document of</p>	Comment noted; see response for details.	828

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>infrastructure damage, and unnecessary lethal control measures, undermining both environmental performance and the project's stated mitigation objectives.</p> <p>The Proponent should develop and implement a Beaver Conflict Management Plan to proactively address the risk of damming and flooding at culverts, bridges, and other water crossings. This plan should identify high-risk water crossings during detailed design and incorporate non-lethal mitigation measures, such as flow devices and exclusion fencing. The plan should also establish a routine monitoring and maintenance protocol for water crossings during both construction and operation phases.</p>	<p>the Final EA/IS, engagement and consultation with Indigenous communities and federal and provincial regulators, as well as requirements outlined in federal and provincial permits, will confirm the final monitoring programs for furbearers and water crossings during construction, operation and maintenance.</p>		
Ginoogaming First Nation	36	<p>The conclusion in the Cumulative Effects Assessment (CEA) that cumulative impacts on wolverines are “not significant” is not scientifically defensible due to a critical omission of the Ring of Fire development and associated industrial expansion. The MFCAR is not an isolated project; it is explicitly intended to enable access to Ontario’s most significant undeveloped mineral deposit, the Ring of Fire, and to catalyze broader industrial activity in the region. The</p>	<p>A. 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</p>	<p>Comment noted; see response for details.</p>	829

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>Eagle’s Nest Mine is included in the CEA; however, it is the only mine site associated with the Ring of Fire that has been considered. The development of this road is anticipated to facilitate mineral extraction at a much broader scale than the Eagle’s Nest mine alone. By omitting this context, the CEA adopts an artificially narrow spatial and temporal scope, which results in a significant underestimation of cumulative habitat loss and fragmentation. The assessment does not consider the full footprint of anticipated mining operations, secondary access roads, transmission corridors, and permanent industrial infrastructure, all of which are reasonably foreseeable outcomes of the MFCAR. This omission critically undermines the validity of the CEA’s conclusions regarding the long-term impacts on wolverine habitat and population viability.</p> <p>This omission is especially concerning as wolverines are highly sensitive to habitat fragmentation and have low reproductive rates. While the EA/IS identifies that the project and associated developments will result in the loss of 73,145 hectares of undisturbed habitat, this figure massively underrepresents the true impact because it excludes the full footprint of future Ring</p>	<p>Environmental Assessment / Impact Statement. For a project to be considered reasonably foreseeable, 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). Potential projects within the Ring of Fire that do not meet the definition of reasonably foreseeable were not included.</p> <p>B. The temporal boundary (timeframe) for the cumulative effects assessment is indefinite as the Community Access Road is permanent and will not be decommissioned. The spatial boundary (Regional Study Area) was selected to encompass the geographic extent of predicted project effects. The temporal and spatial boundaries for the project are appropriate to encompass project effects and have not been updated. For comment on the Ring of Fire, see response to A.</p> <p>C. Wolverines are habitat generalists, therefore the entire disturbance footprints from the Project and the reasonably foreseeable developments were considered as habitat loss in the cumulative effects assessment.</p>		

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>of Fire mining developments and the additional infrastructure that the MFCAR is explicitly intended to enable. These include future access roads, transmission lines, expanded industrial corridors, and increased public access, all of which will further degrade or eliminate functional wolverine habitat. By isolating the MFCAR from the broader industrial development it unlocks, the assessment artificially constrains the spatial and ecological scope of cumulative effects, leading to an unjustified conclusion of insignificance.</p> <p>Moreover, the cumulative effects discussion ignores the access-induced effects beyond the Ring of Fire, such as future forestry, increased trapping and hunting pressure, and additional industrial exploration—none of which are factored into the modeling or significance determination. Despite these considerable gaps, the CEA concludes that wolverine populations will remain “self-sustaining and ecologically effective,” and that impacts remain within the species’ resilience thresholds—while simultaneously acknowledging a low confidence level in this prediction.</p> <p>Given the project’s function as a gateway</p>	<p>D. The cumulative effects of increased public access was assessed in Section 8.2.3.5 of the Appendix K Wildlife Technical Support Document. The cumulative effects of forestry are discussed in Sections 8.2.3.1.1.1 and 8.2.3.1.1.2 of Appendix K.</p> <p>E. As noted above, the cumulative effects of the Project and the other reasonably foreseeable developments are predicted to be significant on wolverine. Overall, the regional wolverine populations may not remain self-sustaining and ecologically effective in the cumulative residual effects assessment.</p> <p>F. The cumulative effects of the Project and the other reasonably foreseeable developments are predicted to be significant.</p>		

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>to industrial-scale development, and the high conservation sensitivity of the wolverine population in this region, the failure to fully include the Ring of Fire and other foreseeable developments in the cumulative effects analysis represents a substantial flaw. A scientifically credible assessment must incorporate a robust and spatially explicit analysis of the full range of developments the MFCAR enables, particularly in regard to habitat loss, fragmentation, connectivity disruption, and indirect mortality pressures. Until the full scope of all reasonably foreseeable regional development is incorporated into the CEA, the claim that cumulative effects on wolverines are “not significant” lacks scientific credibility and cannot be supported.</p> <p>A. The CEA must assess the full extent of reasonably foreseeable development in the Ring of Fire by using the entire mineral tenure footprint and known claims as a conservative baseline for potential future mineral extraction.</p> <p>B. The Proponent must redefine the RSA and timeframe to capture the long-term, regional-scale impacts of industrial</p>			

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>expansion facilitated by the MFCAR (including the Ring of Fire).</p> <p>C. The Proponent must conduct spatial modeling of cumulative habitat loss, fragmentation, and connectivity disruption using up-to-date land cover, proposed development footprints, and species distribution data. This analysis should inform a revised determination of habitat availability and functional connectivity for wolverines.</p> <p>D. The Proponent must include in the CEA the foreseeable consequences of increased public and industrial access, such as expanded trapping and hunting pressure, forestry operations, and exploration activity, which are all known to impact wolverine persistence.</p> <p>E. The Proponent must reassess the significance of cumulative effects based on the expanded impact scenario. The assertion that wolverine populations will remain "self-sustaining and ecologically effective" must be supported by rigorous analysis and appropriately reflect the stated low confidence in the prediction.</p> <p>F. Given the acknowledged uncertainty and the high conservation sensitivity of</p>			

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		wolverines, the Proponent must adopt a precautionary stance in the significance conclusion.			
Ginoogaming First Nation	37	<p>The EA/IS concludes that the cumulative effects of the Project and other reasonably foreseeable developments on wolverine are "not significant,". However, this assessment does not adequately account for climate change as a compounding stressor on wolverine populations, despite acknowledging its influence as "mostly assumed to have an adverse effect" with "low" prediction confidence</p> <p>Wolverine survival and reproduction are closely tied to cold, structured microhabitats that allow for food caching and denning, both of which are threatened by rising temperatures and diminishing spring snow cover. Wolverines rely on these microhabitats to cache food that supports lactation during February–April, a period of high energetic demand and low prey availability. The degradation of snow-dependent “refrigeration zones” reduces cache viability by increasing decomposition and competition from scavengers and microbes, leading to increased risk of early litter loss (Inman,</p>	<p>The determination of significance of the cumulative effects assessment (CEA) on wolverine is provided in Section 8.2.3.6 of Appendix K Wildlife Technical Support Document as significant. However, an error was made in the drafting of the Executive Summary of Appendix K, where the cumulative effects on wolverine were stated as not significant. The Final EA/IS and Appendix K have been updated to confirm cumulative effects on wolverine is determined to be significant.</p> <p>A: The impacts from climate change on wolverine habitat is uncertain because of the variability in climate projection models; as such, potential impacts from climate change, including how natural factors (e.g., fire, snowpack duration) may be altered are qualitatively discussed in the cumulative effects assessment. Section 8.2.3.1.1 of Appendix K has been updated to integrate the findings of additional scientific literature of regional climate predictions into the assessment of snowpack duration, and the potential</p>	Final EA/IS Section 10.3.3 Section 8.2.3.6 of Appendix K Section 8.2.3.1.1 of Appendix K	831

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>Magoun, Persson, & Mattisson, 2012)</p> <p>This concern is especially pronounced in northern Ontario, where the project is situated within the Hudson Bay Lowlands (HBL)—a subarctic zone that, until recently, was among the last Arctic refugia from global warming, buffered by the cooling influence of Hudson Bay Sea ice (Smol et al. 2013). However, detailed climate and lake sediment records now show that the region crossed a climatic tipping point in the 1990s, transitioning abruptly into a phase of rapid warming, particularly during winter and autumn (Smol et al. 2013). This warming is directly linked to shorter snow seasons and earlier ice melt, conditions that undermine the persistent spring snow cover critical to wolverine denning and food caching.</p> <p>The EA/IS fails to meaningfully assess these climate-sensitive behaviors, particularly the species’ reliance on persistent spring snow for denning and the strategic use of winter food caches to bridge periods of scarcity. These adaptations are central to the species’ reproductive success in a low productivity, cold-niche environment, and are known to be highly vulnerable to</p>	<p>implications of how reduced snowpack duration may influence natal and maternal den quality and wolverine reproductive success and wolverine distribution.</p> <p>B: The literature cited in this comment (Smol et al., 2013) has been reviewed and Section 8.2.3.1.1 of Appendix K has been updated to include a more in-depth discussion of regional warming trends and the predicted impacts of reduced snowpack on wolverine survival and reproduction.</p> <p>C: As discussed in response to A and B, the cumulative effects of the Community Access Road, the other reasonably foreseeable developments, and climate change are considered significant.</p> <p>D: See response to C.</p> <p>E: As described in Section 9 of Appendix K, engagement and consultation with Indigenous communities and federal and provincial regulators, as well as requirements outlined in federal and provincial permits or authorizations, will confirm the final monitoring programs for furbearers during construction, operation and maintenance. The monitoring of</p>		

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>climate warming (Inman, Magoun, Persson, & Mattisson, 2012).As such, the interaction between habitat alteration from the Project and climate-induced stressors could produce non-linear cumulative effects that are not captured by habitat area metrics alone.</p> <p>Any assessment of effects on wolverine must account for the ongoing loss of persistent spring snow cover and cold microhabitats that are essential for successful denning and food caching. These features are fundamental to wolverine reproductive success, and their decline due to climate warming, when combined with project-related disturbances, may heighten reproductive failure risks. The CEA should be revisited with a focus on evaluating the long-term implications of climate change for wolverine persistence in the region.</p> <p>A. The Proponent should integrate region-specific climate models into the CEA to assess projected changes in snowpack duration, depth, and spring persistence, particularly during the wolverine denning period (February–April).</p> <p>B. The Proponent should incorporate</p>	<p>climate-sensitive indicators such as spring snow duration, den occupancy, and reproductive success will be considered. The environmental monitoring program will be implemented to verify effects on wildlife and adaptive management will be applied where necessary.</p>		

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>observed regional warming trends (e.g., Smol et al. 2013) into the assessment framework to better evaluate the interaction between anthropogenic habitat alteration and climate-driven loss of suitable denning and caching habitat.</p> <p>C. The Proponent should reassess the conclusion of “not significant” cumulative effects on wolverines in light of climate stressors that reduce population resilience and may push species beyond physiological and ecological thresholds.</p> <p>D. The Proponent should apply a precautionary approach to significance determinations, recognizing the high uncertainty and known vulnerability of wolverines to climate change.</p> <p>E. The Proponent should commit to long-term monitoring of climate-sensitive indicators, such as spring snow duration, den occupancy, and reproductive success, to inform adaptive mitigation and management responses.</p>			
Ginoogaming First Nation	38	Emerging research demonstrates that EA processes in Canada have consistently failed to protect caribou. While the EA/IS is designed to identify and mitigate significant environmental effects, studies	1. The assessment of effects to caribou has been reconsidered and the Final EA/IS has been updated to assess the effects on caribou to be significant as outlined in Appendix M Ungulates	Comment noted; see response for details.	832

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>suggest that EAs often facilitates development in critical caribou habitat rather than constraining it. A national review of assessments found that caribou were frequently identified as at risk, yet nearly every project was approved regardless of the potential for longterm harm (Collard, Dempsey, & Mollie, 2020).In practice, standard mitigation commitments—such as habitat offsets or construction timing windows—are used to justify approvals, even when their effectiveness remains uncertain or unproven over the long term.</p> <p>A fundamental flaw in most EAs, including this EA/IS, is the manipulation of spatial and temporal scale. Assessments often narrowly define project boundaries, obscuring broader patterns of disturbance. This approach is particularly concerning in the context of this project, where the construction of the MFCAR is expected to catalyze a wave of new mineral exploration and development relating to the Ring of Fire. In Northern Ontario, where woodland caribou ranges are already under pressure, the cumulative effects of mining and infrastructure projects pose a serious threat to habitat integrity. Instead of evaluating the broader, landscape-</p>	<p>Technical Support Document.</p> <p>2. We appreciate your feedback and the time you have taken to share your perspective. However, the comments related to formal discussions between Ginoogaming First Nation and the provincial and federal governments are directed at government agencies and outside the scope of the Community Access Road. We would therefore encourage you to direct these to the regulators, as they will be best positioned to address them.</p> <p>3. An Ungulates Management and Monitoring Plan will be developed as part of the Environmental Protection Plan as outlined in Section 9 of Appendix M. Recommendations for mitigations and monitoring approaches provided by First Nations during the comment period of the draft Environmental Assessment / Impact Statement will be considered for inclusion in the Ungulates Management and Monitoring Plan.</p>		

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>level impacts of multiple projects, each environmental assessment is conducted in isolation. As a result, they fail to consider how these developments will collectively accelerate fragmentation within caribou ranges once operational. This piecemeal approach fails to reflect the ecological reality facing caribou, which require large, intact landscapes to persist.</p> <p>The treatment of Indigenous knowledge within the EA/IS further compounds the problem. Indigenous perspectives—particularly warnings about caribou declines and concerns about cumulative impacts are often acknowledged but not reflected in final decisions (Cameron & Kennedy, 2023) Instead of serving as a meaningful check on development, Indigenous knowledge is too often used to support predetermined outcomes, weakening both ecological and cultural stewardship.</p> <p>Taken together, these issues reveal a troubling pattern: EA/IS processes in Canada and Ontario are not equipped to safeguard caribou. Despite growing awareness of the species’ decline and the thresholds beyond which recovery becomes unlikely, assessments continue</p>			

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>to greenlight projects that push caribou habitat closer to collapse. If the intent is to prevent further extirpation, the EA/IS must shift from a project-by-project focus to a regional, landscape-based framework that respects known disturbance limits, incorporates Indigenous leadership, and ensures outcomes are tracked and enforced. Without such reforms, the development of MFCAR and Ring of Fire will drastically accelerate the loss of woodland caribou across northern Ontario.</p> <p>It is the position of GFN that the current Environmental Assessment process is insufficient to protect woodland caribou and the culturally significant subsistence areas our Nation relies upon. Therefore, the Crown, including both federal and provincial governments, must engage in formal discussions with GFN regarding the establishment of an Indigenous Protected and Conserved Area (IPCA) as a meaningful mitigation measure. This IPCA would serve to offset the loss of critical caribou habitat and culturally important landscapes that will be impacted by the Project.</p>			
Ginoogaming	39	The Proponent estimates that 21%	A: Functionally lost caribou habitat (i.e.,	Appendix AB	833

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
First Nation		<p>(98,417 ha) of the ungulate effects assessment LSA is disturbed, based on a 500-meter buffer around anthropogenic features, in accordance with Environment and Climate Change Canada (2023) guidance (ECCC, 2023). However, this buffer distance represents the low end of the scientific consensus and does not align with current understanding of caribou behavior or jurisdictional best practices. Woodland caribou are known to avoid both physical and sensory disturbances at significantly greater distances than 500m (Vors et al., 2007). Ontario’s guidance reflects this by recommending that project proponents minimize sensory disturbance within 10 kilometers of known or potential high use areas. These avoidance behaviors are well documented and underscore growing concerns about the persistent underestimation of disturbance effects in environmental assessments (Collard, Dempsey, & Mollie, 2020) (Cameron & Kennedy, 2023). A 500-meter buffer does not capture the ecological sensitivity of these areas, nor the full spatial extent of functional habitat loss experienced by caribou.</p> <p>A. The Proponent must recalculate functionally lost caribou habitat using a</p>	<p>indirect habitat loss) was calculated using a 500 m buffer, which aligns with guidance from the federal recovery strategy and was shown to influence calf recruitment (ECCC 2020). Some literature as referenced in the comment suggest larger zones of influence (ZOIs) better reflect caribou avoidance behaviour of anthropogenic disturbances, there is uncertainty in the literature about the measurable demographic consequence for caribou. Although caribou (boreal and barren-ground) have been shown to modify their movement behaviour and distribution at distances of 5 to 15 km from development, an effect to survival and reproduction has not been demonstrated.</p> <p>B: The Final Environmental Assessment / Impact Statement has been updated to include Appendix AB Preliminary Biodiversity Offset Plan which includes a plan for offsetting the loss of functional caribou habitat, (habitat restoration, enhancement, long-term protection) along with a long-term monitoring plan to validate success of the offsetting measures. The Preliminary Biodiversity Offset Plan will be finalized during detail design phase.</p>		

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>range of buffer distances— from 500 meters to 15 kilometers—based on proximity to known or potential high-use areas and ecologically sensitive locations such as calving grounds, wintering habitat, and key travel corridors. This approach reflects well-documented variability in caribou responses to disturbance and aligns with both jurisdictional guidance and peer-reviewed literature demonstrating that avoidance can occur at distances far greater than 500 meters. Incorporating this range is essential to more accurately capture the spatial extent of functional habitat loss and to reduce uncertainty in predicting impacts.</p> <p>Assuming a 1-kilometer buffer—which remains at the lower end of scientifically supported avoidance distances—the total disturbed area in the LSA would increase to approximately 196,834 hectares, or 42% of the study area. This would reduce the proportion of undisturbed habitat from the reported 73.5% to approximately 58%, falling well below the 65% threshold identified by Environment and Climate Change Canada (2023) as necessary to support self-sustaining local caribou populations. This shift is particularly concerning in the context of</p>	<p>C: See response to A.</p>		

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>broader cumulative effects, especially given this project’s potential to enable large-scale resource development across the Ring of Fire region.</p> <p>B. The Proponent must commit to achieving no net loss of functional caribou habitat, with compensation measures based on the updated disturbance estimates and delivered through habitat restoration, enhancement, or long-term protection in areas that support caribou recovery.</p> <p>C. The Proponent should use the updated analysis of functional habitat loss to inform the assessment of project impacts, and to guide the development of effective mitigation and offsetting strategies.</p>			
Ginoogaming First Nation	40	<p>The CEA for caribou fails to incorporate all the foreseeable industrial expansion associated with the Ring of Fire. The MFCAR is not an isolated project; it serves as the enabling infrastructure for one of Canada’s largest undeveloped mineral deposits. The Eagle’s Nest Mine is included in the CEA; however, it is the only mine site associated with the Ring of Fire that has been considered. The development of this road is anticipated to</p>	<p>A. As stated in Section 4.4.3.2.3 in Appendix M Ungulates Technical Support Document, for an activity to be considered foreseeable and included in the cumulative effects assessment (CEA), 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). This included development that is certain or reasonably</p>	<p>Comment noted; see response for details.</p>	834

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>facilitate mineral extraction at a much broader scale than the Eagle’s Nest mine alone. By omitting this context, the CEA adopts an artificially narrow spatial and temporal scope, which results in a significant underestimation of cumulative habitat loss and fragmentation. The assessment does not consider the full footprint of anticipated mining operations, secondary access roads, transmission corridors, and permanent industrial infrastructure, all of which are reasonably foreseeable outcomes of the MFCAR. This omission critically undermines the validity of the CEA’s conclusions regarding the long-term impacts on caribou habitat and population viability.</p> <p>A. The Proponent should revise the CEA to include the full range of reasonably foreseeable developments that the MFCAR is expected to enable. The construction of the MFCAR represents a transformative step that will provide access to significant mineral deposits and catalyze widespread industrial development in the region.</p> <p>B. The CEA must assess the full extent of reasonably foreseeable development in the Ring of Fire by using the entire mineral tenure footprint and known</p>	<p>foreseeable and activities with additive effects, where appropriate (Canadian Environmental Assessment Agency, 2018). Reasonably foreseeable activities that were not considered are those that have no publicly disclosed development plan or other information regarding the location and type of project/activity. For a potential future project to be considered in the CEA, preliminary information such as the location and type of activity, extent of the footprint, project components, and anticipated timelines are needed to evaluate if effects from the Project and the potential future project will overlap. The project inclusion list is provided in Table 10.1-1 of the Final EA/IS.</p> <p>B. See response to A.</p>		

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		claims as a conservative baseline for potential future mineral extraction.			
Ginoogaming First Nation	41	<p>The CEA does not account for wildfire as a major and increasing source of disturbance in the boreal forest. Scientific evidence indicates that wildfires are expected to increase in both frequency and intensity due to a combination of rising temperatures, increased lightning activity, and prolonged periods of drought associated with climate change. These factors are altering fire regimes across Northern Ontario, making larger and more severe fires increasingly common.</p> <p>This is highly relevant for caribou, as wildfire removes mature conifer forests that provide essential winter forage in the form of terrestrial lichens. Following fire, the landscape regenerates into early successional forest types dominated by shrubs and young deciduous growth. These habitats are more supportive of moose, which thrive in areas with dense browse and regenerating vegetation. As moose populations increase, wolf densities also rise, since wolves rely on moose as a primary prey species. This leads to elevated predation pressure on caribou, which are more vulnerable in areas where they overlap with high</p>	<p>Climate change and the associated potential for increase in wildfire frequency and severity were considered in the Cumulative Effects Assessment (CEA) of Appendix M Ungulates Technical Support Document. Wildfires are anticipated to contribute cumulatively to reduce habitat availability and distribution and have an adverse influence on survival and reproduction of caribou in the CEA. The magnitude of change is uncertain because of variability in climate projection models. The combined residual cumulative effects from the Project, reasonably foreseeable developments, forest harvest activities and climate change led to a determination of a significant adverse effect on caribou in the Caribou Regional Study Area as described in Section 8 of Appendix M.</p>	Comment noted; see response for details.	835

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>densities of both moose and wolves.</p> <p>The exclusion of wildfire from the CEA represents a significant gap, particularly given its compounding interaction with anthropogenic disturbances. Wildfire contributes not only to the direct loss of caribou habitat, but also to long-term changes in predator-prey dynamics and range connectivity. For a comprehensive assessment of impacts to caribou, wildfire must be included as an interacting disturbance factor alongside development and infrastructure.</p> <p>The CEA should be revisited to incorporate wildfire as a major and increasing source of disturbance in the boreal forest. The assessment must account for the expected rise in wildfire frequency and severity due to climate change and evaluate how wildfire interacts with anthropogenic disturbances to impact caribou habitat, predator-prey dynamics, and range connectivity.</p>			
Ginoogaming First Nation	42	The CEA for moose fails to fully incorporate foreseeable industrial expansion associated with the Ring of Fire. The Eagle’s Nest Mine is included in the CEA; however, it is the only mine	A: The Community Access Road is intended to improve access, foster economic development and improve the overall quality of life for Marten Falls First Nation members. Although the	Final EA/IS Section 9.4.7.4.2	836

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>site associated with the Ring of Fire that has been considered. The development of this road is anticipated to facilitate mineral extraction at a much broader scale than the Eagle’s Nest mine alone. By omitting this reasonably foreseeable development, the Proponent cannot credibly conclude that the project will not have significant impacts on moose. Without accounting for cumulative habitat loss, fragmentation, and increased access pressures tied to broader regional development, the assessment underestimates the risk to moose populations and their longterm viability in the region.</p> <p>A. The Proponent should revise the CEA to include the full range of reasonably foreseeable developments that the MFCAR is expected to enable. The construction of the MFCAR represents a transformative step that will provide access to significant mineral deposits and catalyze widespread industrial development in the region.</p> <p>B. The Proponent should revise the CEA to assess the full extent of reasonably foreseeable development in the Ring of Fire by using the entire mineral tenure footprint and known claims as a</p>	<p>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 Statement process is focused solely on the advancement of the Community Access Road itself—an infrastructure project the Marten Falls community has been advocating for almost four decades.</p> <p>As stated in Section 4.4.3.2.3 in Appendix M Ungulates Technical Support Document, for an activity to be considered foreseeable and included in the cumulative effects assessment (CEA), 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). This included induced development that is certain or reasonably foreseeable and activities with additive effects, where appropriate (Canadian Environmental Assessment Agency, 2018). Reasonably foreseeable activities that were not considered are those that have no publicly disclosed development plan or other information regarding the location and type of project/activity. For a potential future project to be considered in the CEA,</p>		

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>conservative baseline for potential future mineral extraction.</p> <p>C. The Proponent should reassess the significance of project-related impacts on moose and moose habitat, recognizing that from GFN’s perspective, these impacts will be significant. The Crown’s significance determinations often rely on narrow biophysical criteria, while GFN considers the broader cultural, ecological, and relational importance of moose—meaning even small or incremental changes to moose habitat and behavior can represent a serious and unacceptable impact.</p>	<p>preliminary information such as the location and type of activity, extent of the footprint, project components, and anticipated timelines are needed to evaluate if effects from the Project and the potential future project will overlap.</p> <p>B: Please see response to A.</p> <p>C: Given the uncertainty in the magnitude of potential increase in moose harvest from increased public access due to the Project and the limited data on current harvest levels, the residual effects assessment for moose, the Final EA/IS has been updated to precautionarily assume that the increase in hunter harvest could reach unsustainable levels and lead to decreased resilience and maintenance of the self-sustaining and ecologically effective regional moose population. As such, the Final EA/IS has been updated to clarify that residual effects on moose from an increase in public access are precautionarily considered significant. The assessment does not include the broader cultural and relational importance of moose for Indigenous communities. Effects to Indigenous cultural relationships with moose, cultural continuity and wellbeing, traditional</p>		

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
			harvest of moose and traditional land and resource use are assessed separately in the Aboriginal and/or Treaty Rights and Interests Technical Support Document (Appendix O).		
Ginoogaming First Nation	43	<p>The EA/IS underestimates the long-term effects of increased public access on moose populations associated with the MFCAR. While the assessment acknowledges that new roads and trails can lead to greater access by hunters and therefore increase harvest pressure, it ultimately concludes that the resulting effects on moose survival and reproduction will be moderate in magnitude and not significant. This conclusion is not well-supported. The permanent introduction of a year-round access corridor into a largely roadless landscape represents a substantial change to the existing conditions. Moose in the Wildlife Management Units intersected by the project already occur at low densities, and any additional harvest pressure, whether legal or illegal, has the potential to reduce population viability further.</p> <p>The mitigation measures proposed are limited in scope and unlikely to meaningfully prevent or control public</p>	<p>A. Given the uncertainty in the magnitude of potential increase in moose harvest from increased public access due to the Project and the limited data on current harvest levels, the residual effects assessment for moose, the Final EA/IS has been updated to precautionarily assume that the increase in hunter harvest could reach unsustainable levels and lead to decreased resilience and maintenance of the self-sustaining and ecologically effective regional moose population. As such, the Final EA/IS has been updated to clarify that residual effects on moose from an increase in public access are precautionarily considered significant.</p> <p>B. A comprehensive Moose Access and Monitoring Plan will be developed for the Project. The Moose Access and Monitoring Plan will be shared with Ginoogaming First Nation. The plan will include long-term monitoring of moose presence, hunting pressure, identification of high-risk moose collision zones, and</p>	Final EA/IS Section 9.4.7.4.2 Appendix M	837

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>access over time. Gating of access roads, decommissioning of temporary routes, signage, and staff education are all standard practices, but in this context, they are not sufficient. The EA/IS does not provide details on how unauthorized use of access roads or off-highway vehicles will be monitored or enforced. It also assumes, without strong evidence, that the isolation of the project area will naturally limit use. In reality, new road construction often facilitates incremental use by hunters, recreational users, and others over time, especially once a corridor is established.</p> <p>Given the permanent nature of the access road, the known relationship between road access and moose harvest pressure, and the low baseline moose densities in the region, the EA/IS's conclusion that the residual effect is "not significant" is flawed. Without stronger access controls and long-term management commitments, the project will likely result in a lasting and substantial effect on moose survival and reproduction in the study area.</p> <p>A. The Proponent should reclassify the effect of increased public access on moose as significant.</p>	<p>moose-vehicle collisions. The plan will be developed to protect the safety of people and moose. Potential monitoring approaches are described in Section 9 of Appendix M of the Final EA/IS including the implementation of several monitoring plans that will include the following actions and adaptive management triggers or action levels:</p> <ul style="list-style-type: none"> - Monitor moose presence, population trends, and regulated harvest through remote cameras, aerial surveys, and community-based programs - Monitor Indigenous harvest through community-based programs - Monitor the effectiveness of access mitigation measures and success of reclamation and revegetation of decommissioned roads - Monitor moose habitat use and distribution with GPS collars before and after construction of the road - Action levels or triggers for implementing adaptive management measures would be determined through collaboration with Indigenous communities and the Ministry of Natural Resources 		

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>B. The Proponent should commit to developing a comprehensive Moose Access Management and Monitoring Plan in collaboration with GFN. This plan should include enforceable access control measures, such as physical barriers and road-use restrictions, along with a strategy to monitor both authorized and unauthorized use of the corridor. Long-term monitoring of moose presence and hunting pressure should be conducted through community-based observations, camera traps, or aerial surveys, with thresholds established to trigger adaptive management responses if population decline is observed.</p>			
Ginoogaming First Nation	44	<p>The assessment of vehicle collision risks to moose during the construction and operation of the MFCAR underestimates the likely significance of these effects. The conclusion that the residual impact on moose survival and reproduction due to collisions is “not significant” fails to account for broader regional development scenarios, particularly the anticipated industrial traffic associated with future mineral extraction in the Ring of Fire. While the current traffic volumes during construction and maintenance may be limited and subject to mitigation,</p>	<p>A: 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 Environmental Assessment of a project take into account any cumulative environmental effects that are likely to result from the project in combination with the environmental effects of other physical activities that have been or will be carried out.” In alignment with this requirement, the</p>	Final EA/IS Table 9-27	838

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>the MFCAR is positioned as a critical transportation corridor that will likely facilitate significant commercial traffic over the long term.</p> <p>The assessment assumes low traffic volumes and reduced speed limits as a basis for dismissing the collision risk. However, these assumptions are not supported by analysis of potential traffic scenarios tied to Ring of Fire development. Increased heavy truck traffic from mining operations, exploration activity, and supply transport would dramatically elevate the risk of moose-vehicle collisions. Moose are known to be highly susceptible to road mortality, especially in areas with increased vehicle movement, early seral vegetation, and poor visibility. Without considering cumulative development and the transformation of this corridor into a permanent industrial access route, the assessment provides an incomplete and overly optimistic view of collision risks to moose.</p> <p>A. The Proponent should revise the CEA to consider the cumulative impacts of future mineral extraction and associated industrial traffic, especially in the context of the Ring of Fire.</p>	<p>cumulative effects assessment was prepared in accordance with the approved Terms of Reference for the Community Access Road. Notably, Table 10-1 of the Final EA/IS identifies infrastructure projects with spatial or temporal overlap with the Community Access Road, based on publicly available sources that describe or predict specific effects for those projects. Industrial traffic was included in the Final EA/IS. Appendix W Traffic Data Review describes the traffic review undertaken of available traffic data and relevant studies for estimating future volumes, distribution and composition of traffic.</p> <p>B: As noted in Ginoogaming 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, including a Moose Access and Monitoring Plan. 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</p>		

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>B. The Proponent should develop a regional traffic forecast should be developed to assess how vehicle volumes will change if the MFCAR becomes a primary route for mineral transport. Based on this forecast, the project should incorporate a Moose Collision Mitigation and Monitoring Strategy that includes:</p> <ul style="list-style-type: none"> • Identification of high-risk collision zones using moose movement and Indigenous Knowledge; • Installation of wildlife crossing signage, speed restrictions, and, where feasible, road fencing or escape berms; • Implementation of moose-specific monitoring (e.g., roadkill tracking, motion-triggered cameras); • Adaptive mitigation measures that can be triggered based on thresholds of observed moose mortality. <p>C. The Proponent should reconsider the significance determination for vehicle collision risk in light of this likely increase in long-term road use, with the conclusion updated to reflect that the project will have a significant adverse effect on moose due to vehicle collisions unless stronger mitigation and regional planning measures are adopted.</p>	<p>aligned mandate to Marten Falls First Nation, a Terms of Reference between relevant agencies and Ginoogaming First Nation will be established.</p> <p>The Moose Access and Monitoring Plan will include long-term monitoring of moose presence, identification of high-risk moose collision zones, and moose-vehicle collisions. The plan will be developed to protect the safety of people and moose. Potential monitoring approaches are described in Section 9 of Appendix M Ungulates Technical Support Document. In addition, mitigation measures to be implemented to reduce moose mortality and injury from collisions with vehicles and equipment are outlined in Table 7-20 of Appendix M.</p> <p>C: As described in Section 4.4.2.6 of Appendix M, significance of adverse residual effects on ungulate valued components were evaluated using the assessment endpoints of self-sustaining and ecologically effective populations as significance thresholds.</p> <p>From an ecological perspective, Project residual effects from moose-vehicle collisions are expected to be measurable at the individual level and localized to the</p>		

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
			road corridor but are not expected to affect the regional moose population's ability to be self-sustaining or ecologically effective. Therefore, this Project interaction was considered not significant.		
Ginoogaming First Nation	45	<p>GFN acknowledges the Proponent's commitment to developing a Terrestrial Biodiversity Offset Plan to provide a net positive increase in the following habitat types: wetland habitat, migratory bird habitat, myotis habitat, wolverine habitat, caribou habitat, and amphibian breeding habitat. However, it is crucial that this plan includes GFN traditional knowledge to ensure the plan reflects the unique ecological and cultural context of the area. Without reviewing this plan, GFN cannot fully and meaningfully comment on the outcome of these important habitat types.</p> <p>GFN requests to be actively involved in the development and implementation of the Terrestrial Biodiversity Offset Plan, with the opportunity to provide meaningful input throughout the process. To facilitate this participation, the Proponent should provide appropriate financial resources to support GFN involvement in this process.</p>	<p>The Final Environmental Assessment / Impact Statement has been updated to include Appendix AB Preliminary Biodiversity Offset Plan and will be finalized during the detail design phase. The development and implementation of the Preliminary Biodiversity Offset 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>	Comment noted; see response for details.	839

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
Ginoogaming First Nation	46	<p>GFN acknowledges the Proponent's commitment to developing an Environmental Protection Plan to mitigate impacts on wildlife, and vegetation. However, it is crucial that this plan includes GFN traditional knowledge to ensure the plan reflects the unique ecological and cultural context of the area.</p> <p>GFN requests to be actively involved in the development and implementation of the Environmental Protection Plan, with the opportunity to provide meaningful input throughout the process. To facilitate this participation, The Proponent should provide appropriate financial resources to support GFN involvement in this process.</p>	<p>The Environmental Protection Plan will be shared with Ginoogaming First Nation. The development and implementation of the Environmental Protection 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>	840
Ginoogaming First Nation	47	<p>GFN has a deep and enduring connection to the land and the animals that sustain our way of life, and we are gravely concerned about the potential loss of habitat and the decline of important species. The losses of wetland and upland habitats that support furbearers, moose, and other culturally significant species highlight the broader impacts of the project on the ecosystem that GFN relies on. This loss, compounded by decades of legacy impacts, raises serious concerns about</p>	<p>A: As noted in Ginoogaming First Nation 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</p>	<p>Comment noted; see response for details.</p>	841

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>the long-term viability of these species and the health of our traditional lands. Monitoring is essential to accurately quantify these impacts and implement effective measures to address them, ensuring the sustainability of our lands and resources for future generations.</p> <p>A. GFN requests to be actively involved in the follow-up and monitoring programs related to wildlife, birds, vegetation, and ungulates. This includes participation in targeted species surveys to track relative abundance and spatial distribution, as well as contributing traditional knowledge to ensure that monitoring efforts align with GFN priorities and cultural values.</p> <p>B. GFN further requests to be engaged in the development and implementation of adaptive management measures informed by these monitoring results, ensuring that mitigation strategies remain effective over time.</p>	<p>advisory committee with an aligned mandate to Marten Falls First Nation, a Terms of Reference with relevant agencies and GFN will be to established.</p> <p>B: Monitoring results will be provided to the Ministry of Environment, Conservation and Parks (MECP) and the environmental advisory committees can request the results from MECP.</p>		
Ginoogaming First Nation	48	The conclusion in the CEA that cumulative impacts on reptiles and amphibians are “not significant” is not scientifically defensible due to a critical omission of the Ring of Fire development and associated industrial expansion. The MFCAR is not an isolated project; it is	A: The Community Access Road is intended to improve access, foster economic development and improve the overall quality of life for Marten Falls First Nation members. Although the Community Access Road is frequently linked to larger regional efforts such as	Comment noted; see response for details.	842

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>explicitly intended to enable access to Ontario’s most significant undeveloped mineral deposit, the Ring of Fire, and to catalyze broader industrial activity in the region. This includes not only largescale mining (e.g., chromite, nickel, copper) but also associated infrastructure such as roads, power transmission lines, and permanent camps—developments that together represent a transformational land-use change across the RSA. These outcomes are reasonably foreseeable, yet the CEA fails to incorporate or model their effects.</p> <p>This omission is especially concerning for reptiles and amphibians because the amount of heavy equipment traffic on the road will be significantly higher than forecasted in the CEA when considering the Ring of Fire and associated infrastructure development. Reptiles and amphibians are highly vulnerable to road mortality because they move slowly, rely on crossing roads due to habitat fragmentation, bask on warm road surfaces, migrate seasonally to breed, and are often difficult for drivers to see (Andrews et al. 2006) (Garriga et al., 2012).</p> <p>The EA/IS states that the Magnitude of</p>	<p>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 project the Marten Falls community has been advocating for almost four decades.</p> <p>The cumulative effects assessment (CEA) considered traffic for all reasonably foreseeable projects as outline in Table 10.1-1 (formerly Table 10-1) of the Final EA/IS. The full build-out of the Ring of Fire is not understood and adequate information is not available to determine the potential cumulative effects from all potential Ring of Fire developments, and therefore cannot be considered reasonably foreseeable. As of January 20, 2026, the Regional Assessment for the Ring of Fire is not available to the public. The regional assessment working group submitted the interim report to the Chiefs of Partner First Nations and to the Minister of the Environment, Climate Change and Nature.</p> <p>B: As described in Section 7.3.1.6.5.2 of Appendix K Wildlife Technical Support Document, culverts will be modified to</p>		

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>the Cumulative Effect of Collisions with Vehicles and Equipment for Reptile and Amphibians is Low. Additionally, the significance of this Cumulative Effect was not determined for Reptiles and Amphibians. This magnitude likely underrepresents the true impact of road mortality because it excludes the full footprint of the Ring of Fire mining developments and the additional infrastructure that the MFCAR is explicitly intended to enable. These include future access roads, which will cause further road mortality.</p> <p>A. The Proponent should update traffic forecasts and collision risk modeling to reflect higher vehicle volumes from industrial traffic related to the full build-out of the Ring of Fire, rather than relying solely on community access assumptions.</p> <p>B. The Proponent should design and commit to constructing wildlife crossing structures (e.g., amphibian tunnels, culverts, or overpasses), and install directional fencing to guide reptiles and amphibians toward these safe crossings.</p> <p>C. The Proponent should post wildlife crossing signage and reduce speed limits</p>	<p>accommodate safe passage of amphibians and reptiles, and exclusion fencing will be established at strategic locations to funnel these species through to minimize road mortality risks. Additional mitigations for reptiles and amphibians will be considered and incorporated into preliminary and detail design phases.</p> <p>C: As described in Section 7.3.1.6.5.2 of Appendix K, signage will be posted in areas where reptiles and amphibians are regularly observed.</p> <p>D: As described in Section 9 of Appendix K, engagement and consultation with Indigenous communities and federal and provincial regulators, as well as requirements outlined in federal and provincial permits or authorizations, will confirm the final monitoring programs for reptiles and amphibians. As noted in Constance Lake First Nation 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</p>		

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>during key migration and breeding seasons in areas identified as high-risk for road mortality.</p> <p>D. The Proponent should commit to adaptive management measures (e.g., installation of additional crossing structures, reduced speed zones, new signage) if road mortality exceeds thresholds set in consultation with Indigenous Knowledge holders and species experts.</p>	<p>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 with relevant agencies and Indigenous Peoples will be established.</p>		
Ginoogaming First Nation	49	<p>The impact of invasive species on vegetation in the local study area is of great concern to GFN because the existing LSA has limited human disturbance and no invasive species were documented during field surveys. This pristine habitat will very likely have invasive species introduced because roads are major conduits for the spread of invasive plants into new areas as they create disturbed environments that favor invasives and provide a corridor for transmission of seeds on vehicles. One of the measures to mitigate the impact of invasive species propagation within the EA/IS is to use seed mixes with appropriate native species for all seeding and restoration works.</p>	<p>A: Revegetation strategies will be developed as part of the Environmental Protection Plan (EPP). The development and implementation of the EPP 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>B: As noted in Ginoogaming First Nation 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</p>	Comment noted; see response for details.	843

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>A. For all re-vegetation efforts, the Proponent must consult with GFN, to select an appropriate seed mix that closely mimics the pre-construction plant community and includes plants of medicinal and traditional importance. This could be done by either sourcing seed mix from a local seed distributor, or using wild seeds propagated from plants collected from the project area.</p> <p>B. The Proponent should support the establishment of a regional road invasive species subcommittee that includes GFN and other affected First Nations.</p>	<p>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 with relevant agencies and Ginoogaming First Nation will be established.</p>		
Ginoogaming First Nation	50	<p>GFN emphasizes that the MFCAR project area remains one of the few relatively undisturbed regions within our traditional territory. Unlike other parts of our land that have been heavily impacted by forestry, hydro development, and other industrial activities, this area has not experienced large-scale development and continues to support healthy ecosystems and cultural practices.</p> <p>Because of this, the area is particularly sensitive to disturbance. The introduction of a permanent road into this landscape represents a major shift with far-reaching</p>	<p>It is acknowledged that the Community Access Road is proposed to be built in an area that is largely undisturbed by forestry and other industrial activities. The sensitivity of the ecosystem has been evaluated through the assessment of the Project effects on Valued Components (wildlife taxa) that were selected through the consideration of various factors including: the extent to which the Valued Component is linked to the interests or exercise of Aboriginal and Treaty Rights of Indigenous Peoples, the extent to which the effects of the Project have the potential to interact with the</p>	Appendix M	844

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>ecological and cultural consequences. The relative lack of cumulative impacts to date does not mean the land can absorb development more easily—it means the risk of losing what remains is even greater.</p> <p>GFN urges that this heightened sensitivity be acknowledged in the environmental assessment. The project area should not be treated as a blank slate but as one of the last intact areas that still supports the exercise of our rights and the continuity of our culture. As such, any assessment of impacts must apply a more precautionary lens, recognizing that even seemingly minor changes in this context could have disproportionate and lasting consequences.</p> <p>GFN requests that the environmental assessment explicitly recognize the project area as ecologically and culturally sensitive due to its lack of previous development. Given its intact condition and importance to GFN, any disturbance should be considered significant, including impacts to all wildlife species, not only caribou and wolverine.</p>	<p>Valued Component, and the extent to which the Valued Component is linked to federal, or provincial government priorities. Additional discussion regarding the selection of Valued Components is provided in Section 4.2.2 of Appendix K (Wildlife).</p> <p>A comprehensive description of the approach that has been taken for determining the significance of the Project effects on the wildlife Valued Components is provided in Section 4.4.2.6 of Appendix K (Wildlife). This includes an evaluation of the resilience and adaptability of the Valued Components in the context of the existing condition in the Wildlife and Wolverine Regional Study Areas. Significant residual effects are measurable at the population level and are likely to decrease resilience and increase the risk to the maintenance of a self-sustaining and ecologically effective Valued Component Population. Not significant effects are measurable at the individual level, and strong enough to be detectable at the population level but are not likely to decrease resilience and increase the risk to a self-sustaining and ecologically effective Valued Component population.</p>		

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
			<p>The approach used to determine significance is precautionary so that effects are not underestimated, which recognizes the sensitivity of existing wildlife species and habitat to changes to the Community Access Road. In particular, if the weight of evidence indicated that an effect or combined effects are approaching the threshold(s) and had high uncertainty and could be assessed as significant or not significant, a precautionary approach was applied, and the effect was determined to be significant. It is important to note that after consideration of the information and knowledge provided by Indigenous communities during Draft EA/IS review process, effects to moose have been determined to be significant largely because of the uncertainty around the changes in harvest levels from increased access.</p>		
Ginoogaming First Nation	51	Section 5.1.2.2 of the Surface Water Technical Support Document (Appendix F) notes that the Waboose Diversion Dam on the Ogoki River, though located outside the defined RSA, directly influences flows within it, including at the proposed Ogoki River crossings. The dam is managed under the Nipigon River	A. Section 5.1.3 of Appendix F Surface Water Quantity Technical Support Document includes reference to the hydrometric stations within the Upper Ogoki watershed, including the Waboose Lake Reservoir at Waboose Dam, Ogoki River at Waboose Falls Dam, and Ogoki River Diversion to Lake Nipigon stations.	Comment noted; see response for details.	845

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>System Water Management Plan and is primarily regulated based on water levels in Lake Nipigon - not conditions within the Ogoki River system itself.</p> <p>This introduces significant uncertainty regarding seasonal and interannual flow variability in the Ogoki River, particularly during high-water events on Lake Nipigon when the dam may be opened to divert additional water north through the Ogoki basin and into the Albany River system. This is compounded by the fact that high flow periods in the Lake Nipigon System are very likely to coincide with high flow periods in the Ogoki River. This water management approach, focused on downstream hydropower optimization in the Lake Nipigon watershed, may lead to unpredictable, extreme changes in flow volume, velocity, and duration within the Ogoki River.</p> <p>These hydrological uncertainties raise serious concerns for the stability and long-term integrity of the proposed Ogoki River crossing, as well as other infrastructure located near the riverbanks (e.g., access routes, culverts, bridges, work pads). Fluctuations in flow may increase the risk of erosion, sedimentation, and scouring, particularly</p>	<p>Information for these hydrometric gauges ceased publication in 1994, with only a short timeframe of hydrometric information provided by the Ontario Power Generation (i.e., water levels and flows within a two-year span). Based on the limited information publicly available for the Waboose Control Dam, an quantitative assessment could not be completed.</p> <p>B. During the detail design phase, information regarding seasonal variability, including potential flow diversions expected from the Waboose Control Dam, will need to be factored in the design and construction of respective crossing structures that could be directly impacted downstream along the Ogoki River.</p> <p>C. Construction sequencing and risks related to hydrological variability will be determined during detail design phase.</p> <p>D. It will be the Owner/Operator's responsibility to coordinate with Ontario Power Generation and regulators related to the Nipigon River System Water Management Plan. Marten Falls First Nation continues to have discussions with the Province regarding ownership</p>		

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>during extreme flow events or unanticipated dam releases. These risks are further compounded during the construction phase, where sequencing and work windows may be tightly constrained by hydrological conditions that are not easily forecasted under the current dam operating regime. A. The Proponent should prepare a quantitative assessment of flow variability in the Ogoki River, including under multiple Lake Nipigon water level scenarios and potential releases at the Waboose Diversion Dam.</p> <p>B. The Proponent should commit to preparing a detailed hydraulic risk analysis for the Ogoki River crossings, including:</p> <ul style="list-style-type: none"> • Erosion and sedimentation modeling under highflow conditions; • Infrastructure design tolerances for variable and sudden flow increases; • Emergency protocols in the event of unanticipated dam releases. <p>C. The Proponent should identify and assess construction sequencing risks related to hydrological variability, including potential delays or unsafe working conditions during high-flow periods influenced by dam operations.</p>	<p>and operations of the Community Access Road.</p> <p>E. Refer to response B.</p> <p>F. As outlined in response A, limited information is publicly available for Waboose Diversion Dam, and therefore a quantitative assessment in the cumulative effects assessment could not be completed.</p>		

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>D. The Proponent should discuss how they will coordinate with Ontario Power Generation (OPG) and other regulatory authorities managing the Nipigon River System Water Management Plan to ensure advance notification of operational changes at the Waboose Diversion Dam that could affect flow levels in the Ogoki River during both construction and operation phases.</p> <p>E. The Proponent should incorporate design measures into water crossing infrastructure to accommodate long-term uncertainties in hydrology resulting from dam management priorities outside the project's direct control. For example, the crossing could be designed for a 1 in 10,000 year flood event.</p> <p>F. The Waboose Dam should be included in the cumulative effects assessment.</p>			
Ginoogaming First Nation	52	Section 5.1.2.2 of the Surface Water Technical Support Document (Appendix F) does not discuss the Cedar Channels Control Dam (CCCD) on the Albany River despite being mentioned by MFFN members during community engagement for the Project. The CCCD directly influences flows within the Albany River,	A. Section 5.1.3 of Appendix F Surface Water Technical Support Document includes reference to the hydrometric stations within the Albany River watershed. Information collection for the Cedar Channels Control Dam hydrometric gauges has stopped and results are not publicly available, other	Comment noted; see response for details.	846

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>including at the proposed Albany River crossing. The dam is managed under the Lake of the Wood Control Board and is primarily regulated based on water levels in The English River System - not conditions within the Albany River system itself.</p> <p>This introduces significant uncertainty regarding seasonal and interannual flow variability in the Albany River, particularly during high-water events on Lake St. Joseph when the dam may be opened to divert additional water north through the Albany basin and into the Albany River system. This is compounded by the fact that high flow periods in Lake St Joseph are very likely to coincide with high flow periods in the Albany River. This water management approach, focused on downstream hydropower optimization in the English River watershed, may lead to unpredictable, extreme changes in flow volume, velocity, and duration within the Albany River.</p> <p>These hydrological uncertainties raise serious concerns for the stability and long-term integrity of the proposed Albany River crossing, as well as other infrastructure located near the riverbanks (e.g., access routes, culverts, bridges,</p>	<p>than some reports indicating 7 to 14 day averages, published by the Lake of the Woods Control Board. Full datasets of the Albany Outflow diversion would be required to complete a quantitative assessment of flows diverted from Lake St. Joseph.</p> <p>B. During the detail design phase, information regarding seasonal variability, including potential flow diversions expected within the Albany River, will need to be factored in the design and construction of respective crossing structures that could be directly impacted downstream along the Albany River.</p> <p>C. Construction sequencing and risks related to hydrological variability will be determined during detail design phase.</p> <p>D. It will be the Owner/Operator's responsibility to coordinate with Lake of the Woods Control Board and regulators related to the Cedar Channels Control Dam. Marten Falls First Nation continues to have discussions with the Province regarding ownership and operations of the Community Access Road.</p> <p>E. Refer to response B.</p>		

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>work pads). Fluctuations in flow may increase the risk of erosion, sedimentation, and scouring, particularly during extreme flow events or unanticipated dam releases. These risks are further compounded during the construction phase, where sequencing and work windows may be tightly constrained by hydrological conditions that are not easily forecasted under the current dam operating regime.</p> <p>A. The Proponent should prepare a quantitative assessment of flow variability in the Albany River, including under multiple Lake St. Joseph water level scenarios and potential releases at the CCCD.</p> <p>B. The Proponent should commit to preparing a detailed hydraulic risk analysis for the Albany River crossing, including:</p> <ul style="list-style-type: none"> • Erosion and sedimentation modeling under highflow conditions; • Infrastructure design tolerances for variable and sudden flow increases; • Emergency protocols in the event of unanticipated dam releases. <p>C. The Proponent should identify and assess construction sequencing risks</p>	<p>F. As outlined in response A, limited information is publicly available for Cedar Channels Control Dam, and therefore a quantitative assessment in the cumulative effects assessment could not be completed.</p>		

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>related to hydrological variability, including potential delays or unsafe working conditions during high-flow periods influenced by dam operations.</p> <p>D. The Proponent should discuss how they will coordinate with the Lake of the Woods Control Board and other regulatory authorities managing the English River system to ensure advance notification of operational changes at the CCCD that could affect flow levels in the Albany River during both construction and operation phases.</p> <p>E. The Proponent should incorporate design measures into water crossing infrastructure to accommodate long-term uncertainties in hydrology resulting from dam management priorities outside the project's direct control. For example, the crossing could be designed for a 1 in 10,000 year flood event.</p> <p>F. The CCCD should be included in the cumulative effects assessment for the Project.</p>			
Ginoogaming First Nation	53	Section 7.1.2.3 of the EA/IS states that only material that has been cleared through a geochemical verification process will be used to avoid acid rock	A geochemical verification plan will be developed during detail design phase and will be shared with GFN. The development and implementation of the	Comment noted; see response for details.	849

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>drainage (ARD) or metal leaching, and that runoff will be monitored from an erosion and sediment control perspective. While this precautionary approach is appropriate, the details of the geochemical verification plan — including site selection, sampling protocols, and thresholds for exclusion — have not been made available for review.</p> <p>Given the proximity of many borrow and quarry areas to lakes, rivers, wetlands, and culturally significant areas, and the potential for ARD and metal leaching to result in long-term degradation of water quality and aquatic habitat, it is critical that potentially impacted Indigenous Nations have the opportunity to review, comment on, and influence the development and implementation of the geochemical verification plan.</p> <p>The Proponent must provide advanced review of the draft geochemical verification plan to GFN.</p>	<p>geochemical verification 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>		
Ginoogaming First Nation	54	<p>Section 7.2.2.1 of the EA/IS describes a construction phasing approach in which road building could begin simultaneously at multiple locations — for example, both from the north near Marten Falls and the south near Painter Lake Road. While this</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</p>	<p>Comment noted; see response for details.</p>	850

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>may reduce the overall duration of construction, it introduces significant uncertainty regarding the environmental impacts of the construction phase, particularly with respect to:</p> <ul style="list-style-type: none"> • The creation of temporary access routes to reach remote segments; • Increased traffic and staging areas in multiple sensitive landscapes at once; • The potential duplication of environmental disturbances, such as clearing, blasting, sedimentation, and noise, in several places at the same time; • The ability to effectively monitor and enforce sensitive timing windows (e.g., for migratory birds, fish spawning, or cultural practices) when work is occurring concurrently at multiple locations. <p>The lack of detail about how multi-point construction will be implemented leaves important questions unanswered about how residual and cumulative environmental effects will be avoided or minimized during construction.</p> <p>The Proponent should distinguish the differences in impacts from single-point and multi-point construction and factor this into their residual effects assessment and cumulative effects assessment.</p>	<p>discipline-specific study plans. The identification of single-point and multi-point construction impacts were not a regulatory requirement and as such were not developed as part of the Environmental Assessment / Impact Statement.</p>		

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
Ginoogaming First Nation	55	<p>The EA/IS indicates that embankment material borrow areas and aggregate site areas (e.g., sand, gravel, and rock) will be required for the construction of the MFCAR. However, the document lacks detailed information on the confirmed availability of borrow material sources along the proposed corridor. Without this information, it is difficult to evaluate the true scope of environmental and cultural impacts, particularly those related to land and water disturbance, wildlife habitat fragmentation, and sedimentation risk near water crossings.</p> <p>A. The Proponent should provide a comprehensive inventory of proposed borrow sources, including location maps, estimated volumes, material types, and confirmation of suitability through preliminary geotechnical investigations;</p> <p>B. The Proponent should prepare a contingency plan if local materials are found to be insufficient or geochemically unsuitable, including how alternate sites would be selected and assessed.</p>	<p>A: A Band Council Resolution for the Community Access Road Preferred Route was issued in August 2024 and geotechnical work could not commence until the winter of 2025. These are key inputs required to be able to prepare an inventory of aggregate sites. As such a comprehensive inventory of proposed borrow sources will be determined during detail design phase.</p> <p>B: Geotechnical information will be collected from aggregate sites to better understand the volume and quality of materials present. This in turn will be used in detail design phase to assess if the materials are sufficient and of adequate quality or if other sources would be required.</p>	Comment noted; see response for details.	851
Ginoogaming First Nation	56	Section 8.1.7.2 of the EA/IS presents groundwater sampling results that show numerous exceedances of Canadian and Ontario drinking water guidelines, as well	A: Discussion of the observed exceedances is provided in Appendix H Groundwater Technical Support Document. Many of the parameters have	Comment noted; see response for details.	852

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>as provincial water quality objectives and soil/groundwater/sediment standards, for a wide range of metals, volatile organic compounds (VOCs), and other contaminants. These include significant exceedances for arsenic, uranium, lead, chromium, cadmium, and toluene, among others.</p> <p>However, the Proponent does not offer any explanation for the source, significance, or implications of these exceedances, nor how these findings might impact construction planning, potential contamination pathways, or risks to human and ecological health. It is also unclear whether the results reflect natural background conditions, legacy contamination, or project-related disturbance.</p> <p>Given the potential for the project to interact with groundwater — particularly through excavation, dewatering, aggregate extraction, and water crossings — the absence of this analysis represents a significant information gap to properly assess potential impacts of the Project.</p> <p>A. The Proponent should provide a clear explanation for the observed</p>	<p>both anthropogenic and natural sources and the scope of the existing conditions study provided regional groundwater quality information but not detailed investigations into the potential sources of any exceedances.</p> <p>B: Potential environmental and human health risks related to groundwater quality will be dependent on the specific groundwater source involved and the potential receptor exposures. Sources are highly varied and the effects assessment conservatively did not assume that groundwater sources or discharges would meet required guidelines. Therefore, the mitigation requirements include site specific studies, permitting, and monitoring of water takings and discharges do not result in impacts to the environment or human health.</p> <p>C: No contaminated groundwater zones were identified by the existing conditions or effects assessment. Metals parameters exceeding background or guideline levels are assumed to be naturally occurring and volatile organic compounds (VOC) and polycyclic aromatic hydrocarbons (PAH) parameters exceeding background or</p>		

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>exceedances, including whether these are believed to be naturally occurring or anthropogenic;</p> <p>B. The Proponent should assess the potential environmental and human health risks associated with the exceedances, especially in areas of planned construction or borrow material extraction;</p> <p>C. The Proponent should clarify whether any of the contaminated groundwater zones intersect with groundwater-surface water interaction zones, traditional land use areas, or potential drinking water sources that will be utilized by construction camps for the Project.</p>	<p>guideline levels were observed to return or remain at levels below background and guidelines through the existing conditions monitoring. Groundwater will not be a source of drinking water for the construction camp.</p>		
Ginoogaming First Nation	57	<p>The residual effects assessment of water presented in the EA/IS suffers from several critical limitations that significantly undermine its credibility from the perspective of GFN:</p> <ul style="list-style-type: none"> • The assessment is based solely on western scientific approaches, with minimal integration of Indigenous Knowledge or Indigenous-led indicators for measuring change and significance. • It assumes that all mitigation measures and project components will operate as designed, without acknowledging the 	<p>A: The Environmental Assessment / Impact Statement (EA / IS) was prepared to meet provincial and federal regulatory requirements, including the Tailored Impact Statement Guidelines for the Marten Falls Community Access Road issued by the Impact Assessment Agency of Canada (IAAC) on February 24, 2020. The Ministry of Environment Conservation and Parks will determine if the EA / IS meets the provincial requirements; while the IAAC will make a determination on whether or not it meets</p>	<p>Comment noted; see response for details.</p>	853

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>high likelihood of system failures, extreme weather events, or implementation challenges — particularly in remote and sensitive environments.</p> <ul style="list-style-type: none"> • The criteria used to determine significance are based entirely on compliance with federal and provincial regulatory thresholds and do not reflect Indigenous laws, protocols, or standards for environmental and cultural protection. • The magnitude of local impacts is frequently minimized by evaluating them at a regional scale, which obscures sitespecific or culturally important effects that may be significant to GFN. <p>As a result of these methodological choices, nearly all residual effects are classified as “negligible” or “low” in significance — a conclusion that does not reflect how impacted Nations experience environmental, cultural, and health-related change on their lands.</p> <p>Crucially, these flawed residual effects assessments are then used as the foundation for the cumulative effects assessment, meaning that cumulative impacts are also underestimated. By underestimating the significance and extent of individual effects, the cumulative effects assessment fails to</p>	<p>the key issues under federal jurisdiction.</p> <p>B: We appreciate your feedback and the time you have taken to share your perspective. However, the comments are directed at government agencies and outside the scope of the Community Access Road. We would therefore encourage you to direct these to the regulators, as they will be best positioned to address them.</p>		

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>identify the broader systemic risks posed to Indigenous lands, species (such as woodland caribou), water systems, and traditional practices.</p> <p>A. IAAC and the Proponent must acknowledge in the Final EA/IS and Impact Assessment Report that the current residual and cumulative effects assessments do not adequately reflect the impacts to rights as understood and experienced by Indigenous Nations. This recognition should be documented in the record of consultation and in any decisionmaking materials.</p> <p>B. IAAC must clarify how Indigenous definitions of significance and culturally specific impacts will be meaningfully considered in the environmental assessment process going forward — including in any conditions imposed or decisions made under the Impact Assessment Act.</p>			
Ginoogaming First Nation	58	Table 10-4 of the EA/IS concludes that the MFCAR will not result in any significant cumulative effects on surface water or groundwater. Given the scale and duration of the project, the number of water crossings, the presence of borrow and aggregate sites, and the potential	A: 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. The	Comment noted; see response for details.	855

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>interactions with other developments (such as the Northern Road Link and eventual Ring of Fire mining projects), this conclusion appears to reflect a limitation in methodology rather than a legitimate finding.</p> <p>This finding is especially concerning given that Indigenous Nations have consistently raised concerns about changes to water quantity, quality, and flow patterns — not only from the Project but from the combined effects of historical and foreseeable developments. The exclusion of Indigenous Knowledge and culturally informed significance thresholds from the assessment of cumulative effects undermines the legitimacy and completeness of the results.</p> <p>A. The Proponent should work collaboratively with GFN to revisit and revise the cumulative effects assessment on water. This should include the integration of Indigenous Knowledge systems, culturally appropriate indicators, and definitions of significance that reflect the lived experience and worldviews of GFN. This process should be documented transparently and inform the final conclusions of the EA/IS.</p>	<p>assessment of cumulative effects on water for future mining projects that are not reasonably foreseeable (i.e., in the planning, approvals, design stage) is not a regulatory requirement and as such was not included as part of the Environmental Assessment / Impact Statement. It is the responsibility of future projects to include developments that are certain or reasonably foreseeable in their CEAs.</p> <p>B: We appreciate your feedback and the time you have taken to share your perspective. However, the comment is directed at government agencies (Impact Assessment Agency of Canada) and outside the scope of the Community Access Road. We would therefore encourage you to direct these to the regulators, as they will be best positioned to address them.</p>		

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>B. IAAC should require that any such revisions are carried forward into conditions for approval, monitoring, and adaptive management, to ensure the impacts to the rights and interests of GFN are meaningfully addressed.</p>			
Ginoogaming First Nation	59	<p>The EA/IS does not adequately account for the significant challenges associated with managing fuel spills at water crossings in the remote environment where the MFCAR is proposed. According to the U.S. National Oceanic and Atmospheric Administration (NOAA), fuel and oil spills in river systems are especially difficult to contain and clean up due to fast-moving currents, limited access to shorelines, and the tendency for oil to strand in isolated floodplains or oxbows, oils tendency to coat riparian vegetation along its path and the potentially complex interactions of oil with riverine sediments (NOAA, 2015). These risks are further amplified in the case of the MFCAR due to its extreme remoteness, limited seasonal access, and the lack of existing infrastructure that would facilitate rapid response efforts. The combination of these factors poses a serious risk to water quality, aquatic ecosystems, and the rights of Indigenous</p>	<p>A: Section 7.3 of Appendix F Surface Water Technical Support Document includes a commitment to develop and implement a Spill Prevention and Emergency Response Plan which will be developed during detail design phase.</p> <p>B: As outlined in Table 7-5 of Appendix F, changes to surface water quality from wash-off of fuel and explosive chemicals or residue from accidental spills, leaks, or blasting activities to nearby waterbodies was considered as potential project effects. Section 7.3.1.10 and 7.3.1.11 of Appendix F provide descriptions of these potential project effects, mitigation and enhancement measures, and associated residual effects during construction, operation and maintenance.</p>	Comment noted; see response for details.	857

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>Nations that rely on these waters for sustenance and cultural practices. Given the particular challenges with managing spills on this remote road, the Proponent must have project-specific preparations to avoid and mitigate risks from major spills into rivers along the route.</p> <p>It is also important to add that the residual effects assessment does not incorporate the very high likelihood that a major spill will occur into one of the water crossings over the (indefinite) life of the Project.</p> <p>A. GFN requests that the Proponent provide details on the special arrangements they will make to prevent spills and manage major spills into water bodies along the extremely remote and inaccessible route of the Project</p> <p>B. GFN requests that the residual effects assessment incorporates the fact that a spill into a river along the route is likely (if not certain) to happen at some point over the life of the Project. This inevitably means that aspects of the residual effects assessment will deem certain effects to surface waters as significant.</p>			
Ginoogaming	60	In the “Mitigation, Protection, Monitoring,	Surface water quality will be monitored	Comment	858

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
First Nation		<p>and Study Commitments to be Carried Forward to Construction / Operation and Maintenance” Section of the Potential Effects Summary Table for surface water, no specific commitment is made to monitor during high-risk hydrological events like spring melt or major rainfall when erosion, sediment transport, and contaminant movement are most likely.</p> <p>GFN requests a commitment from the Proponent to conduct targeted water quality sampling during spring melt and after storm events at key waterbody crossings and sediment-sensitive areas, with details to be determined in the monitoring programs for all stages of the Project.</p>	<p>according to the requirements of the anticipated Fisheries and Oceans Canada (DFO) and Ministry of Natural Resources (MNR) permits to determine mitigation measures are effective. Surface water quality monitoring will follow the Canadian Council of Ministers of the Environment’s Canadian Water Quality Guidelines for the Protection of Aquatic Life (CCME, 1999). Timing of monitoring and baseline characterization will be determined during monitoring plan development during the detail design phase of the project.</p>	<p>noted; see response for details.</p>	
Ginoogaming First Nation	61	<p>In the “Mitigation, Protection, Monitoring, and Study Commitments to be Carried Forward to Construction / Operation and Maintenance” Section of the Potential Effects Summary Table for surface water, erosion and sediment control is mentioned, however there’s no clear requirement for real-time turbidity monitoring at active waterbody crossings during construction or dewatering activities, nor are there requirements for monitoring for spills other than visual observation of oil sheen on water.</p>	<p>A: Turbidity will be monitored according to the requirements of the anticipated Fisheries and Oceans Canada (DFO) and Ministry of Natural Resources (MNR) permits to determine sediment control measures are effective. Turbidity monitoring will follow the Canadian Council of Ministers of the Environment’s Canadian Water Quality Guidelines for the Protection of Aquatic Life (CCME, 1999). Turbidity will be measured using a water quality meter and samples will be collected for laboratory analysis of total</p>	<p>Comment noted; see response for details.</p>	860

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>A. GFN request that the Proponent commit to real-time turbidity monitoring at all waterbody crossings during in-stream work, with pre-defined action thresholds that trigger stop-work orders or adaptive measures.</p> <p>B. GFN requests that the Proponent commit to best practices for monitoring fuel spills beyond mere visual observation (e.g. real time fuel level monitoring with alert systems that can indicate potential leaks).</p>	<p>suspended solids and are expected to be requirements of the anticipated DFO and MNR permits. Timing of monitoring and baseline characterization will be determined during monitoring plan development during the detail design phase of the project.</p> <p>B: A Spill Prevention and Emergency Response Plan will be developed during detail design phase as outlined in Section 7.3 of Appendix F Surface Water Technical Support Document. The Spill Prevention and Emergency Response Plan will be developed to include best management practices and meet the anticipated DFO and MNR permit requirements.</p>		
Ginoogaming First Nation	62	<p>In the “Mitigation, Protection, Monitoring, and Study Commitments to be Carried Forward to Construction / Operation and Maintenance” Section of the Potential Effects Summary Table for surface water, the Proponent does not indicate whether or not they intend to use road salt for deicing on the road during winter conditions. Road salt can have significant impacts on the ecology adjacent to the road and can attract wildlife (i.e. moose and caribou) to the road increasing the risk of collisions. Most dirt roads do not</p>	<p>As noted in Table 3-3 of Appendix F Surface Water Technical Support Document, several communities provided feedback during Public Information Centre sessions related to the potential impact of salt us on nearby rivers. To address feedback received, Section 7.3 and Table 7-7 of Appendix F include a commitment to use sand on bridge decks and roadways for de-icing instead of salt.</p>	Appendix F Table 7-7, Section 7.3	866

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>use salt for deicing and it is unnecessary to do so to maintain the road under winter conditions. Increased salt concentrations will also increase chloride ions concentrations in watercourses, which is known to be toxic to fish health.</p> <p>GFN request a commitment from the Proponent to not use salt for de-icing along the road.</p>			
Ginoogaming First Nation	63	<p>The Proponent has noted that the Project is located in an area of isolated permafrost. The construction and operation of the road in areas of permafrost would affect the stability of both the permafrost and the road. The Proponent has stated that “the design will primarily use fill along access roads to minimize permafrost degradation and will follow the recommendations outlined in a permafrost management plan.” The construction and operations monitoring plans make no mention of the development of permafrost monitoring at all. The monitoring of permafrost is challenging (especially in areas of discontinuous permafrost) and road design in areas of isolated permafrost is challenging from an engineering perspective due to the spatially variable effects of permafrost on the road.</p>	<p>As outlined in Appendix N Physiography, Terrain, and Soils Technical Support Document, five instances of potential permafrost areas were identified during aerial reconnaissance and terrain mapping along the northern 24 km of the route, northwest of Ogoki, with two locations documented in Construction Disturbance Area (SG-12, SG-19). Additional permafrost studies are recommended to determine the extent and depth of permafrost within the Local Study Area. The owner/operator of the Project will work with the Ministry of Transportation, the Northern Road Link, and Webequie Supply Road Project Team to develop a coordinated approach to permafrost assessment.</p> <p>A: As outlined in Section 2.1.1 and Table 9-1 of Appendix N, a Permafrost</p>	Comment noted; see response for details.	869

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>A. GFN request that the Proponent develop a conceptual permafrost mitigation and monitoring plan for the Project at the EA/IS stage to understand potential impacts to permafrost from the Project.</p> <p>B. GFN request that the Proponent provide details on how they will design the road to accommodate the somewhat unpredictable impacts of isolated permafrost on the road.</p>	<p>Management Plan will be developed during detail design phase.</p> <p>B: Information collected during additional permafrost studies will be used to inform potential changes during detail design phase.</p>		
Ginoogaming First Nation	64	<p>The detailed figures in Appendix N show that quite substantial areas around the road are going to be subject to construction disturbance. These large, disturbed areas can have significant impacts on nearby waterbodies. The figures in Appendix N do not show a buffer between construction disturbance and waterbodies, which creates a risk for waterbodies in the Project area from erosion, sedimentation, blast residues and fuel spills.</p> <p>GFN requests a commitment from the Proponent to avoid construction disturbance within 100m of any waterbody.</p>	<p>We acknowledge Ginoogaming First Nation’s concern regarding potential impacts to nearby waterbodies from construction disturbance, including erosion, sedimentation, and other risks. All construction activities will adhere to applicable guidelines governing setback distances from waterbodies. In accordance with standard planning and environmental protection practices in Ontario, a minimum 30-metre setback from the high-water mark of lakes, rivers, and streams will be maintained wherever feasible. This buffer is consistent with the Provincial Policy Statement (2020) and remains a widely accepted standard in municipal zoning by-laws and conservation authority regulations across</p>	Comment noted; see response for details.	871

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
			<p>Ontario. Although the Provincial Planning Statement (2024) no longer prescribes a fixed setback, the 30-metre buffer continues to be applied as a best practice to protect water quality, aquatic habitat, and shoreline stability.</p>		
Ginoogaming First Nation	65	<p>The EA/IS recognizes that 62.6% of the LSA is comprised of peatland, which are critical to the local hydrological and ecological function. The report further acknowledges that the loss of peatlands would be permanent and have negative effects, particularly where disturbances such as changes in drainage regimes and physical disturbance occur. However, despite the high magnitude of impact in localized areas, all residual effects on peatland ecosystems are classified as “not significant.” This assessment appears to rely heavily on the minimal peatland loss observed within the broader RSA, which downplays the concentrated and more ecologically significant impacts occurring within the LSA, where the majority of disturbances will be focused. Moreover, the report lacks clarity regarding the specific criteria or thresholds applied to determine significance in the context of peatland integrity, habitat loss, or ecological functionality.</p>	<p>A. The approach for the assessment of significance is described in Section 4.4.2.6 of Appendix I Peatlands Technical Support Document, and the assessment of significance was informed by magnitude, duration, and geographic extent as the most important factors, along with consideration of context. The significance of effects was classified as a binary response for Peatlands, rather than an ordinal scale (e.g., low, moderate, high). The assessment endpoints, self-sustaining and ecological effective ecosystems, were used as the threshold for significance and determined at the scale of the Regional Study Area.</p> <p>Significance was assigned to each Project-environment interaction, and an overall determination of significance was provided based on a “weight of evidence” or reasoned narrative approach. This considered magnitude, geographic extent, duration, likelihood of effect, uncertainty, available literature, results</p>	Final EA/IS Section 9.3.5 and Section 10.2.5 Appendix I Section 7.3	873

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>A. The Proponent should reassess the significance determination, placing greater emphasis on the localized, permanent loss of peatland habitat within the LSA and avoid overreliance on RSA-level data, which may obscure the more concentrated impacts within the LSA.</p> <p>B. The Proponent should revise the significance determination process for peatlands to be based primarily on ecological, hydrological, and cultural valuation of peatland systems, and reassess the significance determination based on this updated process.</p>	<p>from field studies, as well as the resilience and adaptive capacity of the ecosystems. Resilience and adaptive capacity provide important ecological context and are related to factors such as current environmental conditions (size of peatland ecosystems, peatland distribution and connectivity, peatland composition and function), and threats to the peatland ecosystems.</p> <p>The application of the assessment endpoints (thresholds) and associated binary approach to assigning significance is precautionary so that effects are not underestimated. In particular, if the weight of evidence indicated that an effect or combined effects are approaching the threshold(s) and had high uncertainty and could be assessed as significant or not significant, a precautionary approach was applied, and the effect was determined to be significant.</p> <p>B. While the pathway associated with the residual effect of changes to the availability and distribution of peatlands was considered not significant, impacts to peatland ecosystems resulting from changes to groundwater (quality and quantity) have been reconsidered. It was</p>		

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
			<p>determined that the effect should be characterized as 'significant', particularly given the high uncertainty of the magnitude of effect of this pathway and the primary mitigation approach (i.e. the floating road). The Final EA/IS and Appendix I have been updated to significant for impacts to peatland ecosystems resulting from changes to groundwater (quality and quantity).</p>		
Ginoogaming First Nation	66	<p>The EA/IS identifies significant uncertainty surrounding two critical residual effects on peatland ecosystems: (1) changes to groundwater regimes that could alter drainage patterns, and (2) changes in surface hydrology that could increase or decrease water flows and levels. This uncertainty is attributed to a limited understanding of local peatland hydrology and hydrogeology, compounded by the preliminary nature of the proposed mitigation measures, such as the floating road design.</p> <p>Despite acknowledging these uncertainties, the report concludes that residual effects will be “not significant,” basing this determination on the assumption that future studies will resolve current gaps in understanding and improve the mitigation measures.</p>	<p>A. We have reconsidered the significance of changes to peatland ecosystems resulting from changes to groundwater and the effect is characterized as 'significant', particularly given the high uncertainty regarding this pathway and the primary mitigation approach (i.e. the floating road). The Final EA/IS and Appendix I Peatlands Technical Support Document have been revised.</p> <p>Significance is not classified on an ordinal scale (e.g., low, moderate, high) but as a binary response (significant or not significant) as described in in Section 4.4.2.6 of Appendix I. As significance determinations are based on the available data at the time of the assessment, the high uncertainty with respect to the design mitigations of the</p>	Comment noted; see response for details.	874

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>This approach is problematic, as it does not align with standard impact assessment protocols, which require significance determinations to be based on the best available data at the time of the assessment. It also fails to account for the precautionary principle, which should be applied when high uncertainty exists.</p> <p>A. The Proponent should take a precautionary approach to their assessment of the effectiveness of mitigation measures, such as floating road designs in the absence of empirical data. This means that in circumstances that there is uncertainty around mitigation measures, they should assume that the mitigations will not be as effective as modeled and that the effects will thus be significant.</p> <p>B. The Proponent should provide updated data or performance studies on the effectiveness of floating road designs from comparable peatland settings.</p> <p>C. The Proponent should develop a comprehensive monitoring and adaptive management plan that includes contingency measures to address any unforeseen hydrological impacts.</p>	<p>floating road on groundwater flow and quality in peatland ecosystems resulted in a determination of significant Project effects on peatlands. This is because of the precautionary principle, which is applied when high uncertainty exists.</p> <p>B. A memo providing additional information about the floating road has been added to the Final EA/IS as Appendix W Engineering Memos.</p> <p>C. Monitoring programs and adaptive management planned for the Project are outlined in Section 14 of the Final EA/IS and in Section 9 of each discipline Technical Support Document and include consideration for changes to hydrology. Due to the assessment of a significant determination for peatlands, long-term monitoring program will be required, with adaptive management (e.g. putting in culverts if changes to peatland form and function noted) procedures included.</p>		

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
Ginoogaming First Nation	67	<p>The EA/IS acknowledges that there is insufficient detailed hydrological and hydrogeological information for both the LSA and RSA, despite identifying potential residual effects on peatland ecosystems due to changes in groundwater and surface water regimes. This lack of baseline data is a critical gap in the assessment, as peatlands are highly sensitive to hydrological changes, and even minor alterations in water flow, drainage, or water table levels could have long-lasting or irreversible effects on these ecosystems. The absence of robust data prevents the accurate modeling of potential impacts, the evaluation of mitigation effectiveness, and the assessment of cumulative effects across the broader wetland complex. As a result, the significance conclusions presented in the report are not sufficiently supported by evidence.</p> <p>A. The Proponent should complete comprehensive site-specific hydrological and hydrogeological baseline studies, accounting for seasonal variations, groundwater-surface water interactions, and water table mapping. The collected data should be used to develop predictive models for water flow, drainage patterns, and water table</p>	<p>A: Additional studies have been recommended to occur during detail design, including a groundwater monitoring program and water budget study. These studies are intended to improve project understanding of the anticipated impacts of the floating road methodology on peatlands and reduce associated uncertainty specific to changes to groundwater quantity and flow. Proposed studies are described in Sections 9 and 10 of Appendix I Peatlands Technical Support Document.</p> <p>B: Reassessment of proposed mitigation measures will take place as part of the detail design process once information from the studies outlined in response to A have been obtained.</p> <p>C: We have reconsidered the significance of changes to peatland ecosystems resulting from changes to groundwater and the effect is characterized as 'significant', particularly given the high uncertainty regarding this pathway and the primary mitigation approach (i.e. the floating road). The Final EA/IS and Appendix I have been revised.</p>	Final EA/IS Appendix I	876

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>changes resulting from road construction and long-term operations and assess the potential indirect hydrological effects extending beyond the project footprint, particularly on interconnected wetland systems.</p> <p>B. The Proponent should reassess the effectiveness of proposed mitigation measures, including floating road designs, based on updated data.</p> <p>C. Until the Proponent completes these studies and integrates them into the EA/IS, the EA/IS should clearly state that the findings related to peatland impacts are preliminary and subject to change.</p>			
Ginoogaming First Nation	68	<p>The proposed MFCAR poses a significant risk to the region’s extensive peatland carbon stores. The road corridor intersects peatlands that collectively hold up to 96 million tonnes of soil organic carbon, with over 1.38 million tonnes located within the immediate construction disturbance area. These ecosystems currently function as carbon sinks, with negative CO₂ fluxes observed across undisturbed areas. However, within the construction zone, carbon fluxes shift toward emissions—indicating that disturbed peatlands may</p>	<p>The implementation of the floating road methodology described in Section 7.3.1.4.2 of Appendix I Peatlands Technical Support Document and the carefully considered placement of culverts in peatland environments are measures that are expected to reduce the overall impact of road construction and operation on peatland systems. Additional studies have been recommended to occur during detail design, including a groundwater monitoring program and water budget study. These studies are intended to</p>	Comment noted; see response for details.	879

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>become net sources of greenhouse gases.</p> <p>While the road footprint may appear narrow, the ecological consequences are not minor. Disturbance of peatlands through excavation, compaction, or altered hydrology can release long-stored carbon, disrupt sequestration processes, and contribute disproportionately to climate change—especially when considered over the full length of the road and its operational lifespan.</p> <p>The Proponent should prioritize design alternatives that minimize peatland disturbance. Where impacts are unavoidable, robust mitigation measures, including peatland restoration plans, hydrological protection strategies, and carbon offset commitments should be developed and transparently evaluated. Given the global significance of boreal peatlands for climate regulation, it is essential that peatland preservation is prioritized.</p>	<p>improve project understanding of the anticipated impacts of the floating road methodology on peatlands and reduce associated uncertainty specific to changes to groundwater quantity and flow as described in Sections 9 and 10 of Appendix I.</p> <p>Additionally, a Preliminary Biodiversity Offset Plan has been prepared (Appendix AB) and implementation will aim to restore and offset peatland ecosystems, to the extent feasible. The specific approach will be determined through consultation with Indigenous communities (such as Ginoogaming Lake First Nation) and regulators and generally follows a hierarchy of restoration, reclamation and offset alternatives (e.g. financial compensation directed towards wetland research or inventory work to fill existing information gaps).</p>		
Ginoogaming First Nation	69	Edge and fragmentation effects on peatland ecosystems were determined to be negligible in magnitude. The two studies referenced (Harper et. al., 2015;	Forested habitats are not only upland habitats as many peatlands (e.g., treed fens, treed bogs, forested swamps) are also 'forested' communities and comprise	Comment noted; see response for details.	881

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>Franklin et al., 2021) within the Draft EA/IS investigate edge effects on boreal forest ecosystems, which are very different from peatland ecosystems. Furthermore, the Draft Peatlands Technical Support Document states that “boreal forests are generally adapted to large-scale natural disturbances.” However, road development is not considered a natural disturbance. Therefore, we disagree with the assessment that the magnitude of edge effects on peatlands is negligible.</p> <p>Given that the studies used to support a negligible magnitude effect for edge effects on peatlands were focused on forest habitats (upland habitat), not peatlands (wetland habitat), the Proponent should provide scientifically defensible reasoning to justify why edge effects to peatlands were determined to be negligible in magnitude.</p>	<p>a large proportion of the boreal forest, therefore would have been included in the studies referenced. It is also recognized that a road is not a natural disturbance. However, the statement in the report that boreal forests are adapted to large-scale natural disturbances is still relevant as it one of the factors that influenced the finding that boreal forest systems are less influenced by edge effects than tropical or temperate forest systems.</p> <p>It is also acknowledged in Section 7.3.1.6.1 of Appendix I Peatland Technical Support Document that “edge effects on open bog, fen and organic marsh peatland communities are likely to be more related to hydrological or hydrogeological changes introduced by the road of construction “edge” where the pooling of water or drying of peat and occur”. These effects are accounted for through surface water and groundwater pathways. Likewise, the introduction and spread of invasive species is addressed in a separate pathway. Any additional fragmentation and edge effects were considered negligible. This avoids the double counting of effects.</p>		
Ginoogaming	70	Peatlands are of utmost importance to	A: The development and implementation	Appendix AB	883

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
First Nation		<p>GFN as 46 of the 56 plants identified as traditional use plants grow in peatland ecosystems as stated in Table 3.1 of Appendix I. In addition, peatlands provide habitat for many animals that are hunted by our community members including moose. GFN does not accept the conclusion that all predicted residual effects on peatlands are not significant considering 2,150.6 ha of peatland will be directly removed. GFN is especially concerned because the peatland loss will be mostly irreversible considering how challenging peatlands are to restore to their natural composition and function.</p> <p>A. GFN requests to be actively involved in the development and implementation of all plans and monitoring related to peatland restoration including the Vegetation Restoration Plan, with the opportunity to provide meaningful input throughout the process. To facilitate this participation, the Proponent should provide appropriate financial resources to support GFN involvement in this process.</p> <p>B. For all impacted peatland that cannot be restored to its natural function and composition, the Proponent should provide accommodation measures to GFN for the loss of Traditional Use Plant</p>	<p>of the Vegetation Restoration 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>As noted in Ginoogaming First Nation 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, including vegetation restoration. 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 GFN will be established.</p> <p>B: The Final Environmental Assessment / Impact Statement has been updated to include Appendix AB Preliminary Biodiversity Offset Plan which includes a plan for offsetting the loss of peatlands</p>		

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		habitat within their Traditional Territory.	(where feasible), along with a long-term monitoring plan to validate success of the offsetting measures. The Preliminary Biodiversity Offset Plan will be finalized during detail design phase.		
Ginoogaming First Nation	79	<p>A significant portion of the Project-related air contaminant emissions are related to burning of organic materials during the construction phase. Burning emits material concentrations of particulates (TSP, PM 10, PM 2.5), Nitrogen Dioxide, Acrolein, Acetaldehyde, Formaldehyde, Benzene, Toluene, Ethylbenzene, Xylene, Butadiene, Benzo[a]pyrene and other PAHs). Many of these substances are toxic at low concentrations and in some cases they are known carcinogens. Emissions from burning pose potential risks to GFN members working on the Project or using the land in the area. The Proponent could reduce air emissions greatly by reducing the amount of burning used in the construction phase.</p> <p>To significantly reduce air contaminant emissions and protect the health of Project workers and local land users, it is recommended that the Proponent minimize or eliminate the open burning of organic materials during the construction phase. Alternative disposal methods</p>	The air quality assessment included an assumption that 50% of vegetation cleared will be burned and 50% will be chipped (Section 4.4.3 of Appendix S Air Quality and Greenhouse Gas Technical Support Document). Table 7-1 of Appendix S includes a mitigation to reduce the quantity of materials that are either burned or chipped (i.e., consider salvageable material such as salvageable lumber), and if burning is required, consider avoiding periods where meteorological conditions (e.g., wind speed) may result in smoke impacting sensitive receptor locations.	Comment noted; see response for details.	887

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>such as mulching, chipping, composting, or off-site removal should be prioritized. In cases where burning is deemed necessary, it should be strictly controlled and subject to best practices for emission reduction, including use of clean-burning equipment, scheduling burns under optimal meteorological conditions, and implementing air quality monitoring. This approach will help mitigate the release of toxic and carcinogenic substances such as particulate matter, NO₂, PAHs, and volatile organic compounds (VOCs), thereby reducing health risks and supporting environmental protection.</p>			
Ginoogaming First Nation	80	<p>The Proponent does not discuss the potential impacts on air quality for the industrial users of the road – specifically mining. Since this MFCAR is closely linked to the development of the Ring of Fire, there is a high likelihood that the road will be used to transport ore or mineral concentrates to the south. Mining related hauling has the potential to exacerbate particulate and air contaminant emissions as larger mining vehicles would be used, which would create higher particulates and criteria air contaminant emissions (associated with burning more diesel). The ore or concentrate being hauled also has the</p>	<p>A. 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. The assessment of cumulative effects on water for future mining projects that are not reasonably foreseeable (i.e., in the planning, approvals, design stage) is not a regulatory requirement and as such was not included as part of the Environmental Assessment / Impact Statement. It is the responsibility of future projects to include developments</p>		888

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>potential to become airborne during transport. Mining related use of the MFCAR would greatly increase impacts to local air quality.</p> <p>A. The Proponent must include a comprehensive assessment of potential air quality impacts associated with anticipated industrial use of the proposed road, particularly from mining-related activities in the Ring of Fire region. This should involve evaluating emissions from heavy-duty diesel vehicles used for transporting ore and mineral concentrates, which are expected to generate elevated levels of particulate matter (PM) and criteria air contaminants (CACs). Additionally, the potential for ore or concentrate to become airborne during transport should be assessed.</p> <p>B. These mining-related emissions should be incorporated into the air dispersion modeling to more accurately predict the spatial and temporal distribution of pollutants along the road corridor. The EA/IS should be updated to reflect these revised modeling results and to ensure that air quality predictions consider the full range of anticipated road uses. Mitigation measures—such as advanced dust suppression</p>	<p>that are certain or reasonably foreseeable in their CEAs.</p> <p>B. See response to A.</p>		

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>technologies, enclosed or covered transport methods, and the use of cleaner fuel or vehicle technologies— should be identified and integrated into project planning to reduce adverse air quality impacts.</p>			
Ginoogaming First Nation	71	<p>The Proponent’s air dispersion model does not include any special receptor locations related to GFN traditional land and resources use (TLRU) and Indigenous Knowledge (IK) sites. GFN members use the lands and waters in the Project area for TLRU and ceremonial/spiritual purposes and will be exposed to project related air emissions.</p> <p>GFN TLRU and IK sites should be considered in the Proponent’s air quality assessment. The geographic locations for TLRU and IK should be inputted into the air dispersion model as special receptors. This will provide site specific data for GFN land users who use the Project area so they can effectively assess the Project’s impact on land use and rights.</p>	<p>Ginoogaming First Nation is invited to provide traditional land and resource use, and Indigenous Knowledge information for consideration as part of the air quality assessment. At the time of finalizing the EA/IS, no traditional land and resource use or Indigenous Knowledge has been received from Ginoogaming First Nation.</p>	<p>Comment noted; see response for details.</p>	890
Ginoogaming First Nation	72	<p>GFN disagrees with the Proponents assessment of the significance determination for Volatile Organic Compounds (VOCs) and Polycyclic</p>	<p>A: Biophysical determinants to human health have been assessed as part of the problem formulation report which is included in Appendix T Community Well-</p>	<p>Appendix T</p>	893

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>Aromatic Hydrocarbons (PAHs) as being considered insignificant. PAHs and VOCs are toxic at very low concentrations and in some cases (e.g. benzene, benzopyrene) they are known carcinogens.</p> <p>Exposure to VOCs and PAHs, even for a short duration, can have negative health impacts on humans. GFN is especially concerned about VOC and PAH exposure for GFN members who may be working on the Project and/or using the land in close proximity to the Project. For construction workers they could be exposed to VOCs and PAHs for as long as 10 years.</p> <p>Further, there is no air quality sampling planned for any VOCs or PAHs during any phase of the Project. It will be impossible to know the concentrations without monitoring, which is a health risk for GFN members who may be working on the Project or using the land nearby.</p> <p>A. GFN strongly recommends that the assessment of the significance of VOCs and PAHs be revisited and updated to reflect the serious health risks associated with exposure to these substances, even at low concentrations. Given the potential</p>	<p>Being Technical Support Document.</p> <p>B: As outlined in Section 9.2 of Appendix S Air Quality and Greenhouse Gas Technical Support Document, an emission monitoring program is recommended during construction which could involve air monitoring and construction activity management, including where mitigation options may be required to help reduce air quality impacts. The inclusion of volatile organic compounds (VOCs) and polycyclic aromatic hydrocarbons (PAHs) in the program will be considered during detail design.</p> <p>Monitoring for air quality during operation presents challenges due to the length of the Community Access Road, but monitoring at representative locations will be one of the considerations in development of a dust management plan for operations. Information gathered through other technical monitoring programs specific to potential air quality concerns could also be considered as part of dust management planning.</p> <p>C: Refer to response A.</p> <p>D: Mitigation strategies related to VOCs</p>		

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>for long-term exposure—especially for construction workers who could be on-site for up to 10 years—it is critical to reconsider their significance in the environmental assessment and conduct additional monitoring.</p> <p>B. The Proponent must implement air quality sampling and continuous monitoring for VOCs and PAHs during all phases of the Project. This is crucial to accurately assess the levels of these contaminants and understand their impact on air quality.</p> <p>C. The Proponent must conduct a detailed human health risk assessment specifically focused on VOCs and PAHs, particularly for those working on the construction phase and those living or using the land near the Project area. This should include longterm exposure scenarios.</p> <p>D. The Proponent must develop and implement targeted mitigation strategies to minimize VOC and PAH emissions. This should include both operational and construction phase controls, such as the use of safer construction materials, air filtration systems, and regular decontamination procedures for workers.</p>	<p>and PAHs are outlined in Table 10-1 of Appendix S and include:</p> <ul style="list-style-type: none"> - limiting vehicle speed, where feasible - strategic haul planning to reduce overall number of haul trips required for aggregate material demands. Consider sourcing material from the closest available material transfer points o <p>Where possible, reduce the quantity of material that is either burned or chipped (i.e., consider salvageable material such as salable lumber)</p> <ul style="list-style-type: none"> - when burning is required consider avoiding periods where meteorological conditions (e.g., wind speed) may result in smoke impacting sensitive receptor locations - maintain equipment as per manufacturing specifications - implement anti-idling policies or procedures to reduce total vehicle idling times 		

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
Ginoogaming First Nation	73	<p>The Proponent did not include any metals in the list of air contaminants carried forward as indicators in the air quality assessment/air dispersion model. Particulate emissions would include numerous trace metals which would become airborne and deposit in the natural environment (e.g. on traditionally important vegetation or waterways) or be inhaled by humans or wildlife. This could have potential health impacts on GFN members harvesting or using the land near the Project, or GFN members employed by the Project.</p> <p>The Proponent must assess trace metals as an indicator or potential contaminant of concern in the air quality assessment and the air dispersion model. This is required to ensure the Project is within regulatory compliance and does not pose any potential health threats to GFN members.</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. Specifically, potential contaminants of concern included in the air quality assessment and dispersion model align with those identified in Section 7.2.2 of the Terms of Reference and Table 1 of the Ministry of Transportation's Environmental Guide for Assessing and Mitigating the Air Quality Impacts and Greenhouse Gas Emissions of Provincial Transportation Projects (MTO 2020). The inclusion of trace metals in the air quality assessment and air dispersion model were not a regulatory requirement and as such were not included as part of the Environmental Assessment / Impact Statement.</p>	Comment noted; see response for details.	894
Ginoogaming First Nation	74	<p>The Proponent predicts exceedances of provincial air quality criteria and significant residual effects related to particulates including PM 2.5 - Particulate Matter with a diameter of 2.5 micrometers or smaller, PM 10 - Particulate Matter with a diameter of 10 micrometers or smaller, and TSP - Total</p>	<p>A: Emissions (or dust) management plans will be prepared for both construction and operations in response to predicted exceedances, mostly of particulate concentrations. The predictions are presented with and without mitigation. For the operations phase, the use of environmentally</p>	Appendix T	895

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>Suspended Particulates. These particulates also contain trace metals, which is not discussed in the EIS or appendices.</p> <p>Particulates (TSP, PM 10, PM 2.5) and trace metals will deposit on important vegetation communities, waterbodies, and wildlife habitat. Particulates will also be ingested by humans and wildlife. All of these pathways have the potential to cause adverse health impacts, especially on GFN members who may be working in the Project.</p> <p>The Proponent’s mitigation measures (e.g. dust suppression, anti-idling, etc.) are unlikely to be effective given the extensive area of activities in the construction and operations phase. Applying dust suppressants to over 200 km of road is impractical, costly, and only effective for a short duration.</p> <p>A. GFN strongly recommends that a more comprehensive and effective approach be adopted to address the potential exceedances of air quality criteria for particulates (PM 2.5, PM 10, TSP) and trace metals, as well as their associated health and environmental impacts. Given the predicted</p>	<p>friendly dust suppression methods approved by the Ontario ministry of Transport would be considered, as would the use of roadside vegetation and natural windbreaks (Table 7-7 of Appendix S Air Quality and Greenhouse Gas Technical Support Document). Other mitigation approaches would also be considered such as setting road speed limits. The operations emissions management plan would also include the development of an appropriate air monitoring program.</p> <p>A construction emissions management plan would consider the mitigation options in Table 7-1 of Appendix S to reduce particulate emissions from material handling and combustion products from blasting and vehicle use.</p> <p>A discussion on potential project effects from air quality on human health is provided in Appendix T Community Well-Being Technical Support Document. As outlined in Section 9.2 of Appendix S, a construction monitoring program has been recommended as a mechanism to help mitigate and/or identify potential conditions that may lead to air quality impacts from construction related activities. A monitoring program, where</p>		

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>exceedances and the significant residual effects on air quality, it is crucial to implement enhanced monitoring and mitigation strategies to minimize the adverse impacts on both the environment and human health, particularly for GFN members who may be exposed during the construction and operation phases of the Project.</p> <p>B. The Proponent must implement a robust air quality monitoring program that tracks particulate levels (TSP, PM 10, PM 2.5) and the concentration of trace metals in real-time, throughout all phases of the Project. Monitoring should include both ambient air quality and potential deposition rates on vegetation, waterbodies, and wildlife habitat. The monitoring program should be designed to detect exceedances early and enable prompt corrective actions.</p> <p>C. The Proponent must conduct a more detailed health risk assessment that includes the potential long-term exposure of GFN members, workers, and wildlife to particulates and trace metals. This assessment should account for various exposure pathways, including inhalation, ingestion, and contact with contaminated soil or vegetation. Special attention</p>	<p>feasible, may involve either or both air monitoring as well as construction activity monitoring. Construction monitoring activity may include verification that construction best management practices are being applied or identify where additional efforts/mitigation techniques may be necessary to help reduce air quality impacts.</p> <p>Mitigation applied to reduce dust will also reduce metal deposition. Metals were not assessed specifically because they were not included in the list of substances required to be assessed according to the project terms of reference approved by the Ministry of Environment, Conservation and Parks (MECP).</p> <p>B: Refer to response A.</p> <p>C: An assessment of biophysical determinants of human health has been completed and is provided in Appendix T.</p> <p>D: Refer to response A. The mitigation measures suggested in Recommendation D will be among the mitigation considered for inclusion in an emissions management plan.</p> <p>E: Table 7-15 of Appendix J Vegetation</p>		

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>should be given to the vulnerable populations within the GFN community.</p> <p>D. Given the extensive nature of the construction and operational activities, the current mitigation measures (such as dust suppression and anti-idling) will likely be insufficient. The Proponent must investigate the feasibility of enhanced measures such as:</p> <ul style="list-style-type: none"> • Use of advanced dust suppression technologies (e.g., chemical dust suppressants with longerlasting effects). • Establishment of physical barriers or windbreaks along critical areas to reduce particulate dispersion. • Implementation of a staged approach to dust control based on real-time air quality data, ensuring that mitigation efforts are targeted to areas with the highest risk. <p>E. After construction activities, the Proponent must ensure that a comprehensive land restoration and revegetation plan is in place to quickly stabilize soils and vegetation, reducing the potential for dust emissions over the long term. This plan should include the planting of dust-absorbing vegetation species along the construction route and key areas where sensitive ecosystems may be impacted.</p>	<p>Technical Support Document includes a commitment to prepare and implement a Vegetation Restoration Plan that will include seeding and/or planting of Traditional Use plants and progressive restoration on staging areas no longer needed.</p> <p>F: If the Community Access Road EA / IS be approved to proceed, a consultation and engagement program will be established to guide discussions through detail design. Monitoring results will be provided to the MECP and local existing environmental advisory committees can request the results from MECP.</p>		

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>F. The Proponent must regularly engage with GFN throughout the Project’s lifecycle to ensure concerns related to air quality and health risks are addressed promptly. This includes providing GFN members with access to air quality data and health information and supporting community-based monitoring efforts where feasible.</p>			
Ginoogaming First Nation	75	<p>In Appendix S1, Section 7.1.1 The Proponent only looks at “Community Impacts” on MFFN, not of surrounding First Nations, namely GFN. The Project is likely to have impacts on communities other than MFFN, those impacts should also be discussed.</p> <p>The Proponent must broaden the discussion of Community Impacts to include surrounding GFN and areas of shared Territory that may be used for harvesting or cultural purposes.</p>	<p>We acknowledge Ginoogaming First Nations' concern. In addition to the Indigenous communities within the Local Study Area (LSA; Marten Falls First Nation and Aroland First Nation), other Indigenous communities from the Regional Study Area (RSA) maintain Traditional practices (e.g., hunting, fishing, navigation of waterways) that have a potential pathway for effect within the LSA. The Final EA/IS has been updated to include Indigenous communities in the effects assessment where a clear pathway for potential impact exists to appropriately assess effects on Traditional activities, harvesting and cultural practices.</p> <p>The assessment to determine potential pathways to effects relies on the confidential Aboriginal Treaty Rights and</p>	Final EA/IS Appendices	896

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
			<p>Interests (ATRI) reports prepared for each Indigenous community. As part of the ATRI reports, communities defined Areas of Interest (AOI) which were compared to the Community Access Road LSA to determine overlap. Where overlap exists and a pathway for effect was identified, the communities have been included in the assessment.</p> <p>Potential new effects and mitigations have been added to the Final EA/IS include but are not limited to:</p> <ul style="list-style-type: none"> - Identifying key traditional hunting, trapping, and gathering areas to minimize construction activities during peat harvest seasons. - Designate specific approved locations for berry picking and recreational fishing while identifying restricted areas to protect community resources. - Owner/Operator to establish a working group with Marten Falls First Nation and Aroland First Nation to meet regularly to discuss community-proposed topics. 		
Ginoogaming First Nation	76	GFN is concerned about the wide variance in the construction timeline for the Project (3 to 10 years), as this will significantly impact air quality and contaminant emissions. A longer construction period, especially up to 10	A: Section 6.1 of Atmospheric Environment and Greenhouse Gasses (GHG) Study Plan (attached to Appendix S Air Quality and Greenhouse Gas Technical Support Document) outlines the construction timeline is anticipated to	Comment noted; see response for details.	897

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>years, will lead to higher emissions, worsening air quality.</p> <p>From a human health perspective, prolonged exposure to elevated air contaminants, especially particulates, VOCs, and metals over up to 10 years—pose a risk to GFN members working on the Project. The difference between 3 years and 10 years of exposure is considerable, with long-term health effects, particularly for those with respiratory or cardiovascular vulnerabilities.</p> <p>GFN recommends that the Proponent better refine construction timelines and model air contaminant emissions accordingly. The Proponent should include a thorough health impact assessment and implement robust mitigation measures to address air quality concerns, particularly if the construction timeline extends beyond 3 years. The health of GFN community members and other construction workers should be prioritized in any decision regarding the construction duration.</p>	<p>be 3 to 10 years to complete. The air quality and GHG assessments were based on a 10 year construction timeline.</p> <p>B: The health and safety of construction workers will be the responsibility of the Owner/Operator of the Community Access Road. The health of the community related to air quality has been assessed as part of the problem formulation report which is included in Appendix T Community Well-Being Technical Support Document.</p>		
Ginoogaming First Nation	77	Diesel emissions associated with construction equipment, pickup trucks, crushing equipment, and other	An emissions management plan will be prepared during detail design phase for both construction and operation phases	Comment noted; see response for	898

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>equipment are a major source of Project-related air contaminant emissions (particulates, VOCs, PAHs, GHGs). The Proponent must look to decrease the Project's reliance on diesel fuel and utilize Best Available Technology Economically Achievable (BATEA) for construction. Diesel combustion has a significant contribution to the Project's overall carbon footprint and local air quality that could be avoided using other technology (e.g., electric or LNG powered equipment). The GHG emissions and air pollutant emissions would be drastically decreased if alternative technology was implemented.</p> <p>The Proponent must conduct a BATEA study to examine methods for reducing construction-related air contaminants and GHG emissions through the use of other technologies and equipment.</p>	<p>and will include vehicle emissions and considerations for the use of non-diesel vehicles. Other mitigations to reduce fuel consumption are outlined in Table 7-1 of Appendix S Atmospheric Environment Technical Support Document and include but are not limited to equipment maintenance, speed control, idling time reduction, fleet management to reduce trips and haul distance.</p>	<p>details.</p>	
Ginoogaming First Nation	78	<p>The Proponent does not provide any commitments or details related to monitoring ambient air quality or specific emissions during the construction or operations phases of the Project. The Proponent only commits to construction monitoring to ensure mitigation measures are in place. As discussed in the EA/IS there would be no mechanism to</p>	<p>A. An emissions management plan will be prepared for both construction and operations phases. Mitigation measures will be considered for all activities. Not all mitigation options by activity have been included in the residual assessment in Appendix S Atmospheric Environmental Technical Support Document, and additional mitigations will be provided in</p>	<p>Comment noted; see response for details.</p>	899

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>quantitatively monitor or track air contaminant emissions.</p> <p>The Proponent does not specify how GFN will be involved in ambient air quality monitoring during construction and operations phases of the Project.</p> <p>A. The Proponent must conduct ambient air quality monitoring for all contaminants of concern (including particulates and metals) for the construction and a reasonable portion of the operations phase. This is necessary to ensure regulatory compliance and verify the accuracy of air dispersion models and EA/IS predictions. Without quantitative data through ambient monitoring, it will be impossible to measure the Project's impact on air quality.</p> <p>B. GFN requests the implementation of robust and long-term environmental monitoring to verify protection of the environment, including community-led ambient air quality monitoring during Construction and Operations of the Project. The Proponent must work with GFN to identify appropriate contaminants for monitoring, sampling sites, methodology, etc.</p>	<p>the emissions management plan. After reviewing the impacts of mitigation options on air quality, monitoring will be considered in each phase and appropriate levels of monitoring will be conducted based on the results of the assessment.</p> <p>B. As noted in Ginoogaming First Nation 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 Ginoogaming First Nation will be established.</p>		

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
Ginoogaming First Nation	81	<p>Climate change may shift the timing of sensitive periods for wildlife, such as breeding or migration. Construction planning and mitigation measures should be responsive to these changes and updated based on ongoing monitoring.</p> <p>The Proponent should incorporate a dynamic construction and mitigation plan that accounts for potential shifts in the timing of sensitive wildlife periods due to climate change.</p>	<p>It is acknowledged that climate change has the potential to shift the timing of sensitive periods for wildlife such as breeding or migration. Project mitigation planning, which includes monitoring and adaptive management, will consider the effects of climate change in determining the appropriate timing of sensitive periods for wildlife (e.g., breeding, migration, denning).</p> <p>Appendix Y Climate Adaptation and Resiliency Technical Support Document has been updated to include the recommendation to review relevant scientific findings and revisit climate projections and associated potential impacts from climate change, and consider the ongoing inclusion of Indigenous observations regarding the experienced effects of climate change.</p>	Appendix Y	900
Ginoogaming First Nation	82	<p>Climate change is expected to create conditions that support the spread of invasive species. Equipment, construction materials, and workers can unintentionally introduce invasive species, requiring strict hygiene protocols and monitoring.</p> <p>The Proponent should outline the pathways through which equipment,</p>	<p>Section 7.3 of Appendix J Vegetation Technical Support Document outlines potential project effects including pathways for the spread of invasive species. Section 7.3.1.5.2 of Appendix J includes a commitment to develop and implement an Environmental Protection Plan (EPP) to prevent, detect, control (i.e., remove), and monitor areas with invasive species during construction,</p>	Comment noted; see response for details	901

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>construction materials, and workers may inadvertently facilitate the spread of invasive species and clearly describe the proposed hygiene protocols and monitoring measures that will be implemented to prevent and manage the introduction and spread of invasive species.</p>	<p>operation and maintenance, and provides a list of preliminary mitigation measures to be included in the EPP.</p>		
Ginoogaming First Nation	83	<p>The EA/IS would benefit from a clearer discussion of cumulative climate risks—specifically, how multiple climate events may interact or compound one another. For example, the combination of extended heatwaves followed by intense storms, or the occurrence of wildfires during road construction and maintenance activities, could amplify both environmental and operational impacts.</p> <p>Addressing these scenarios is important for risk planning and ensuring that mitigation strategies are robust under increasingly complex climate conditions.</p> <p>The Proponent should enhance the EA/IS by providing a more detailed analysis of cumulative climate risks, specifically addressing how multiple climate events may interact with each other. This analysis should explore</p>	<p>Due to the lack of data, incorporating compound or successive events such as intense storms or occurrences of wildfires into the risk assessment is challenging. Nevertheless, a general discussion of such events and their potential consequences has been included in Appendix Y Climate Adaptation and Resiliency, Section 8.</p>	<p>Comment noted; see response for details.</p>	902

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>scenarios where extended heatwaves, intense storms, or wildfires may overlap, particularly during critical periods such as road construction, operation, and maintenance activities. The assessment should incorporate strategies for managing these compounded risks, ensuring that mitigation measures are adaptable to increasingly complex climate conditions.</p>			
Ginoogaming First Nation	39	<p>Chapter 12 discusses high level technical assessments and risk analyses around climate change indicators and impacts but does not describe how impacted First Nations will be involved in ongoing climate monitoring and response. Climate change will have widespread and interconnected impacts across the region.</p> <p>As such, the EA/IS should outline a more inclusive and coordinated approach that actively involves regional First Nations in the monitoring, management, and adaptation process. Given that the MFCAR may become a critical link for more northern communities during climate-related emergencies, regional Indigenous engagement in climate planning is essential.</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. The development of a regional Indigenous monitoring, management and adaptation process with the listed characteristics is not a regulatory requirement and as such was not developed as part of the Environmental Assessment / Impact Statement.</p>	<p>Comment noted; see response for details.</p>	903

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>The Proponent should revise the EA/IS to outline a more coordinated approach that actively involves regional First Nations in climate monitoring, management, and adaptation processes. This should include specific mechanisms for engagement, such as establishing consultation frameworks, identifying key roles for GFN in data collection and analysis, and ensuring GFN participation in climate risk response and planning.</p>			
Ginoogaming First Nation	85	<p>Hotter, drier summers combined with more frequent lightning storms are expected to increase wildfire frequency and severity. This could result in more frequent road closures and a need for coordinated evacuation planning, particularly where the MFCAR will serve as the primary or sole route in and out.</p> <p>GFN requests that the Proponent develop and include a detailed evacuation and community resilience plan in the EA/IS, addressing the potential for more frequent and severe wildfires. This plan should focus on ensuring safe, coordinated evacuations in the event of road closures, especially considering that the MFCAR may be the primary or only route for access to and from the community. The plan should</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. The development of an evacuation and community resilience plan is not a regulatory requirement and as such was not developed as part of the Environmental Assessment / Impact Statement.</p>	<p>Comment noted; see response for details</p>	904

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		involve collaboration with local authorities, First Nations, and emergency response teams to establish clear protocols, identify evacuation routes, and ensure that adequate resources are available for timely evacuations.			
Ginoogaming First Nation	86	<p>There are several significant climate-related risks that are increasingly affecting infrastructure and community health but are missing from the current risk evaluation framework.</p> <p>These should be explicitly included as individual rows in Table 12-2 and subsequently assessed in Tables 12-3 and 12-4 to ensure a more comprehensive understanding of potential impacts during both construction and operation of the MFCAR. Specifically:</p> <ul style="list-style-type: none"> • Freeze-Thaw Cycles: Increased temperature variability, particularly during shoulder seasons, is expected to result in unpredictable freeze thaw cycles. This may result in accelerated road and infrastructure degradation, heightened safety risks for vehicles, and significantly higher maintenance costs. • Expansion of Pests and Disease: Warmer temperatures associated with climate change support the northward 	<p>The Environmental Assessment / Impact Statement and the Technical Support Documents were developed to meet the requirements of the Terms of Reference, the Tailored Impact Statement Guidelines and the discipline-specific study plans. The development of a risk evaluation framework for freeze-thaw cycles and invasive species is not a regulatory requirement and as such was not developed as part of the Environmental Assessment / Impact Statement.</p>	Comment noted; see response for details	905

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>and expansion of pests such as ticks and mosquitoes, resulting in elevated risk of illnesses, reduced safety for land users and workers, and potential disruption of traditional land use and outdoor activities.</p> <p>Inclusion of these risks would strengthen the assessment's relevance to real-world conditions and enhance climate resilience planning for the MFCAR.</p> <p>GFN requests that the Proponent revise the risk evaluation framework in Chapter 12 to explicitly include the following climate-related risks: freeze-thaw cycles and the expansion of pests and disease. These risks should be added as individual rows in Table 12-2, with a clear analysis of their potential impacts on road infrastructure, safety, and public health. The assessment in Tables 12-3 and 12-4 should also be updated to evaluate the implications of these risks during both construction and operation phases.</p>			
Ginoogaming First Nation	87	<p>Section 12.4 (Conclusion)</p> <p>While Section 12.4 acknowledges that not all climate-related risks can be eliminated, there is limited discussion of adaptive management as a tool for</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	Comment noted; see response for details.	906

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>addressing these evolving risks over time. Given the uncertainties surrounding long-term climate projections and their localized impacts, it is essential that adaptive management plans be developed, clearly articulated, and regularly re-evaluated throughout the construction and operational phases of the MFCAR. As new climate data and regional predictions become available, strategies and mitigation measures should be updated to reflect emerging risks and ensure the long-term resilience of the road, associated infrastructure, and surrounding ecosystems and communities.</p> <p>GFN requests that the Proponent develop a detailed adaptive management plan that explicitly addresses the evolving climate-related risks associated with the MFCAR. This plan should outline clear procedures for regularly monitoring and re-evaluating climate data and regional predictions throughout both the construction and operational phases, including specific mechanisms for adjusting strategies and mitigation measures as new information emerges.</p>	<p>discipline-specific study plans. The development of a adaptive management plan is not a regulatory requirement and as such was not developed as part of the Environmental Assessment / Impact Statement.</p>		
Ginoogaming First Nation	88	While the EA/IS identifies various species at risk and references applicable	The Impact Assessment Agency of Canada (the Agency) issued the Tailored	Comment noted; see	907

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>federal obligations under the Species at Risk Act and other legislation, it does not fully demonstrate how the MFCAR project aligns with Canada's broader climate change commitments, including Net-Zero Emissions by 2050 or the Sustainable Development Goals (SDGs). Although the EA/IS highlights some general sustainability practices, such as using recycled materials and rainwater harvesting, it lacks explicit mention of how the project will contribute to these national sustainability objectives. Additionally, there are no defined indicators or performance metrics to track and ensure accountability toward these goals over the project's lifecycle.</p> <p>GFN request that the Proponent provide greater clarity in linking the project to Canada's climate action and sustainability targets, alongside measurable indicators for monitoring and adaptive management, would enhance the EA/IS's alignment with national commitments.</p>	<p>Impact Statement Guidelines for the Marten Falls First Nation Community Access Road on February 24, 2020. On June 20, 2024, the Budget Implementation Act, 2024, No. 1, received Royal Assent and brought into force amendments to the Impact Assessment Act.</p> <p>The Agency sent a letter to Marten Falls First Nation on June 11, 2025 outlining the next steps in the Community Access Road Impact Statement Phase due to the amendments made to the Impact Assessment Act. As stated in the letter, the Agency will focus their technical review of the Community Access Road Impact Statement on key issues under federal jurisdiction, which are relevant for decision making, specifically federal effects and the positive benefits of the Community Access Road. The Agency will also concentrate on leveraging federal mechanisms outside of the Impact Assessment Act as well as provincial legislative frameworks and instruments, to address the key issues. Key issues the Agency will focus on are with respect to fish and fish habitat, migratory birds, potential impacts to Indigenous Peoples and public interest factors.</p>	<p>response for details.</p>	

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
			<p>The Environmental Assessment / Impact Statement (EA / IS) was prepared to meet provincial and federal regulatory requirements. The Ministry of Environment Conservation and Parks will determine if the EA / IS meets the provincial requirements; while the Agency will make a determination on whether or not it meets the key issues under federal jurisdiction.</p>		
Ginoogaming First Nation	89	<p>The EA/IS outlines the project's sustainability contributions primarily for Marten Falls First Nation, emphasizing social, economic, and cultural benefits. However, it overlooks the potential impacts on neighboring First Nations, who may also be affected by the MFCAR. A more comprehensive approach should consider how the project's sustainability efforts will benefit or impact surrounding communities.</p> <p>GFN request that the Proponent provide a comprehensive evaluation of the potential impacts on neighboring First Nations, ensuring that the benefits and potential risks of the MFCAR are considered in a regional context. This should involve direct consultation with neighboring Indigenous communities to</p>	<p>The Impact Assessment Agency of Canada (the Agency) issued the Tailored Impact Statement Guidelines for the Marten Falls First Nation Community Access Road on February 24, 2020. On June 20, 2024, the Budget Implementation Act, 2024, No. 1, received Royal Assent and brought into force amendments to the Impact Assessment Act.</p> <p>The Agency sent a letter to Marten Falls First Nation on June 11, 2025 outlining the next steps in the Community Access Road Impact Statement Phase due to the amendments made to the Impact Assessment Act. As stated in the letter, the Agency will focus their technical review of the Community Access Road Impact Statement on key issues under federal jurisdiction, which are relevant for</p>	Comment noted; see response for details.	911

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>identify their concerns, needs, and expectations regarding social, economic, and environmental impacts.</p> <p>The EA/IS should clearly articulate how the project’s sustainability efforts will support or address the needs of surrounding communities, both during construction and throughout the operational phase.</p>	<p>decision making, specifically federal effects and the positive benefits of the Community Access Road. The Agency will also concentrate on leveraging federal mechanisms outside of the Impact Assessment Act as well as provincial legislative frameworks and instruments, to address the key issues. Key issues the Agency will focus on are with respect to fish and fish habitat, migratory birds, potential impacts to Indigenous Peoples and public interest factors.</p> <p>Section 13.3 of the Final EA/IS was prepared to meet federal regulatory requirements. The Ministry of Environment Conservation and Parks will determine if the EA/IS meets the provincial requirements; while the Agency will make a determination on whether or not it meets the key issues under federal jurisdiction.</p>		
Ginoogaming First Nation	90	The EA/IS does not include any long-term monitoring or management commitments related to greenhouse gas emissions, climate resilience, or broader sustainability objectives during the operation phase of the MFCAR. This is a critical gap, particularly given the cumulative and evolving nature of climate change impacts. While the residual	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. The development of a climate and sustainability monitoring program is not a	Comment noted; see response for details.	912

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		<p>effects assessment concludes that there will be no significant GHGrelated effects, this does not account for how the project may interact with other regional and long-term climate stressors. A lack of climate-related monitoring also limits the project's ability to contribute meaningfully to cumulative effects assessments at the regional level.</p> <p>GFN request that the Proponent develop and include a climate and sustainability monitoring program to be implemented during the construction and operational phases of the MFCAR.</p>	<p>regulatory requirement and as such was not developed as part of the Environmental Assessment / Impact Statement.</p>		