

## Appendix F

### Response to the Summary of Issues

**Table F-1: Response to Summary of Issues**

| Item No.                     | Summary of Issue   | Proponent Response   | Cross-Reference to Section of the Detailed Project Description            | Cross-Reference to Section of the Summary DPD         |
|------------------------------|--|--|---|---|
| <b>Fish and Fish Habitat</b> |  |  |   |   |
| 1                            | Request for information about potential watercourse crossing locations, known fish species distribution, and proposed mitigation   | <p>As described in Section 11.1 (Project Infrastructure and Temporary and Permanent Structures) and shown in Figure 11-2 (Potential Water Crossings), there are approximately 76 watercourses and waterbodies that intersect all alternative corridor segments. The actual number of water crossings will not be known until a corridor is chosen as well as the road alignment within that corridor, and could range from approximately 21 to 49 individual watercourse crossings.</p> <p>The Project is undergoing a provincial environmental assessment under the Ontario <i>Environmental Assessment Act</i>, and is expected to require an impact assessment under the federal <i>Impact Assessment Act</i>. Some preliminary information of local fish species is identified in Section 16.2.1 (Fish and Fish Habitat), and baseline studies are underway to further characterize fish and fish habitat. Some proposed mitigation measures are identified in Section 21.1.2 (Preliminary Proposed Mitigation), however further information on mitigation measures will be developed during the EA/IA.</p>  | Section 11.1, Section 16.2.1, Section 21.1.2                              | Section 11.1, Section 16.2.1, Appendix C              |
| 2                            | Request for further information on the changes to the movement and dispersion of fish populations, spawning and reproductive behaviour, due to construction and operation activities, including construction of watercourse crossings. | <p>As described in Section 11.1 (Project Infrastructure and Temporary and Permanent Structures) and shown in Figure 11-2 (Potential Water Crossings), there are approximately 76 watercourses and waterbodies that intersect all alternative corridor segments. The actual number of water crossings will not be known until a corridor is chosen as well as the road alignment within that corridor, and could range from approximately 21 to 49 individual watercourse crossings.</p> <p>Some preliminary information of local fish species is identified in Section 16.2.1 (Fish and Fish Habitat), and baseline studies are underway to further characterize fish and fish habitat. Once baseline data and project design information is advanced, the potential effects and mitigation measures mentioned in this issue can be further assessed.</p> <p>The Project is undergoing a provincial environmental assessment under the Ontario <i>Environmental Assessment Act</i>, and is expected to require an impact assessment under the federal <i>Impact Assessment Act</i>. As described in Section 21.1.1 (Potential Changes to Fish and Fish Habitat under the</p> | Section 11.1, Figure 11-2, Section 16.2.1, Section 21.1.1, Section 21.1.2 | Section 11.1, Figure 11-2, Section 16.2.1, Appendix C |

| Item No. | Summary of Issue  | Proponent Response   | Cross-Reference to Section of the Detailed Project Description | Cross-Reference to Section of the Summary DPD |
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|          |   | <p><i>Fisheries Act</i>) and 21.1.2 (Preliminary Proposed Mitigation), potential effects as well as the mitigation measures for Fish and Fish habitat, including but not limited to those identified in this issue, will be considered and assessed during the EA/IA.</p>  |  |   |
| 3        | <p>Need for further information on effects to fish and fish habitat from changes to water quality, increased fishing activity, borehole drilling near rivers, runoff from roads, and contamination from gas, oil, road salt and hazardous waste pollutants.</p>   | <p>As described in Section 21.1 (Potential Changes to Fish and Fish Habitat Under the <i>Fisheries Act</i>), potential effects to fish and fish habitat including, but not limited to those identified in this issue will be considered and assessed during the EA/IA.</p> <p>The Project is undergoing a provincial environmental assessment under the Ontario <i>Environmental Assessment Act</i>, and is expected to require an impact assessment under the federal <i>Impact Assessment Act</i>. Once baseline data and project design information is advanced, the potential effects mentioned in this issue can be assessed, and appropriate mitigation measures can be developed.</p> | Section 21.1   | Appendix C                                    |
| 4        | <p>Concerns about potential effects on fish and fish habitat during all project phases, including:</p> <ul style="list-style-type: none"> <li>› death or harm to fish, including from the temporary relocation of fish;</li> <li>› alteration, disruption, fragmentation or destruction of fish habitat, including spawning habitat;</li> <li>› changes to water quality, quantity and flow; and</li> <li>› obstruction of fish passages from in-water works during construction and maintenance of watercourse crossings and culverts, and filling in wetlands and other waterbodies.</li> </ul> | <p>As described in Section 21.1 (Potential Changes to Fish and Fish Habitat Under the <i>Fisheries Act</i>), potential effects to fish and fish habitat including, but not limited to those identified in this issue will be considered and assessed during the EA/IA.</p> <p>The Project is undergoing a provincial environmental assessment under the Ontario <i>Environmental Assessment Act</i>, and is expected to require an impact assessment under the federal <i>Impact Assessment Act</i>. Once baseline data and project design information is advanced, the potential effects mentioned in this issue can be assessed, and appropriate mitigation measures can be developed.</p> | Section 21.1   | Appendix C                                    |

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| 5  | <p>Comments about lake sturgeon gathering in spring spawning aggregations in fast flowing water at locations favoured for road construction across rivers. This would increase the accessibility of spawning lake sturgeon to fishers, and increase the vulnerability of lake sturgeon to potentially unsustainable population levels due to harvesting pressure.</p>   | <p>As described in Section 21.1 (Potential Changes to Fish and Fish Habitat Under the <i>Fisheries Act</i>), increased harvesting pressure is identified as a potential effect. Section 21.1.2 (Preliminary Proposed Mitigation) identifies mitigation measures, including limiting public access to watercourses crossed by the roadway which will alleviate some potential pressure. Once baseline data and project design information is advanced, the potential effects mentioned in this issue can be assessed, and appropriate mitigation measures can be developed.</p>  | <p>Section 21.1, Section 21.1.2</p>                            | <p>Appendix C</p>                             |
| <b>Migratory Birds, Other Birds and Their Habitats</b> |   |   |  |   |
| 6  | <p>Request for additional information on the potential effects on birds, including federally-listed species at risk, migratory birds and species of importance to Indigenous communities (e.g., eagles, geese, ruffed grouse, spruce grouse), and their habitats (including nesting sites), during all project phases, including disturbance or mortality from:</p> <ul style="list-style-type: none"> <li>› habitat loss, alteration or fragmentation;</li> <li>› site alteration and vegetation clearing;</li> <li>› introduction of invasive species, parasites and diseases to the region;</li> <li>› traffic;</li> </ul> | <p>The Project is undergoing a provincial environmental assessment under the Ontario <i>Environmental Assessment Act</i>, and is expected to require an impact assessment under the federal <i>Impact Assessment Act</i>. As described in Section 21.3 (Potential Changes to Migratory Birds under the <i>Migratory Birds Convention Act</i>, 1994) and Section 25.9.1 (Potential Effects), potential effects on bird species including but not limited to those identified in this issue, will be considered and assessed during the EA/IA. The preliminary potential effects to Indigenous communities are also identified in Section 23.2.1 (Potential Effects). More baseline data and project design information is required before a detailed assessment of potential effects can be conducted. Additional information on the potential effects to both Birds and Bird Habitat, as well as their importance to Indigenous communities will be included in the EAR/IS.</p> | <p>Section 21.3, Section 23.2.1, Section 25.9.1</p>            | <p>Appendix C</p>                             |

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|          | <ul style="list-style-type: none"> <li>› construction and maintenance activities, including winter de-icing;</li> <li>› accidents and spills;</li> <li>› air emissions;</li> <li>› noise levels; and</li> <li>› light pollution.</li> </ul>  |  |  |   |
| 7        | Request for additional information on the potential effects to migratory patterns and corridors of birds (e.g., geese and other migratory birds) due to impacts to important habitats, such as wetlands, eskers and islands in the muskeg lakes, which represent habitat for nesting and breeding. | As described in Section 16.2.3.2 (Proposed Baseline Studies), Waterfowl Aerial Migration surveys identifying the features mentioned in this issue are underway (such as migration routes, nesting habitat, and breeding habitat). The loss of migration routes is included as a potential effect in Section 25.9.1 (Potential Effects) and Appendix G (Summary of Potential Effects and Preliminary Proposed Mitigation Measures). More detailed information on migratory corridors and patterns, as well as potential effects and mitigation measures, will be presented in the EAR/IS.   | Section 16.2.3.2, Section 25.9.1, Appendix G                   | Appendix C                                    |
| 8        | Request for information on the potential presence of any species on Schedule 1 of the <i>Migratory Birds Regulations, 2022</i> , that may breed in the project area.   | As described in Section 16.2.3.2 (Proposed Baseline Studies - Birds and Bird Habitat) and Section 16.2.5.2 (Proposed Baseline Studies - Species at Risk), the presence and usage of the landscape by species on Schedule 1 of the <i>Species at Risk Act</i> and the <i>Migratory Bird Regulations, 2022</i> is currently underway.<br><br>Specifically, Schedule 1 of the <i>Migration Bird Regulations, 2022</i> refers to a number of seabirds found along the coastlines of North America and the time that is required before an unused nest can be removed. These birds are unlikely to be found near the NRL study areas and as such do not breed in the area. However, a number of Schedule 1 species under the <i>Species at Risk Act</i> are known to occur within the NRL study areas and their presence will be assessed during the EA/IA. | Section 16.2.3.2, Section 16.2.5.2                             | N/A   |

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| 9   | Request for additional information on mitigation measures proposed to avoid mortality and disturbance of birds, particularly with respect to light pollution, increased noise, and accidents and spills.   | <p>As discussed in Sections 21.3.2 (Preliminary Proposed Mitigation - Potential Changes to Migratory Birds under the <i>Migratory Birds Convention Act</i>, 1994) and Section 25.9.2 (Preliminary Proposed Mitigation - Birds and Bird Habitat), preliminary proposed mitigation measures for light pollution include: "Use shaded and/or directed lights and energy efficient bulbs that are only as bright as necessary, where feasible and safe to do so to minimize light pollution."</p> <p>More baseline data and project design information is required before a detailed assessment of potential effects and development of mitigation measures can be conducted. Additional information on mitigation measures with respect to birds will be included in the EAR/IS.</p> | Section 21.3.2, Section 25.9.2                                 | Appendix C                                    |
| <b>Species at Risk, Terrestrial Wildlife and Their Habitats</b> |  |   |  |   |
| 10  | <p>Request for information on baseline data collection on federally listed species at risk and COSEWIC- listed species<sup>1</sup>, including wolverine, lake sturgeon, caribou (Boreal and Eastern Migratory populations of migratory and sedentary ecotypes, and notably the Missisa Range), golden eagles, little brown myotis, northern myotis and tricolored bat.</p> <p>--</p> <p><sup>1</sup> COSEWIC stands for Committee on the Status of Endangered Wildlife in Canada, an independent advisory panel to the Minister of Environment and Climate Change that assesses the national status of wildlife species at risk of extinction.</p> | <p>Baseline data collection on federally listed species at risk and COSEWIC-listed species is discussed in Section 16.2.5.2 (Proposed Baseline Studies). More detailed information on the studies will be provided in the Study Plans (including the Species at Risk Study Plan) and in the EAR/IS.</p>   | Section 16.2.5.2   | N/A   |

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| 11       | <p>Request for more information on potential impacts on species at risk (including individual mortality) and their habitats, resulting from:</p> <ul style="list-style-type: none"> <li>› changes to home range and migration/movement patterns;</li> <li>› habitat alteration and fragmentation (which can lead to difficulty finding food, mates and suitable habitat);</li> <li>› loss or reduction of upland habitats, such as eskers and bat roosting habitat;</li> <li>› peatland dewatering;</li> <li>› aggregates pits and quarries near eskers;</li> <li>› potential changes to water and air quality;</li> <li>› increased pollution;</li> <li>› vehicular collisions; and</li> <li>› increased human access for recreational activities.</li> </ul> | <p>The Project is undergoing a provincial environmental assessment under the Ontario <i>Environmental Assessment Act</i>, and is expected to require an impact assessment under the federal <i>Impact Assessment Act</i>. As described in Section 25.11.1 (Potential Effects), potential effects on Species at Risk, including but not limited to those identified in this issue, will be considered and assessed during the EA/IA.</p> <p>More baseline data and project design information is required before a detailed assessment of potential effects can be conducted. Additional information on the potential effects on Species at Risk will be included in the EAR/IS.</p> | Section 25.11.1  | Appendix C                                    |
| 12       | <p>Concerns about potential effects on caribou populations (Boreal and Eastern Migratory) including population stress, impacts on migration patterns and habitat fragmentation from linear infrastructure, as well as cumulative effects from future foreseeable projects.</p>   | <p>As described in Section 25.11.1 (Potential Effects), effects to SAR species (including habitat loss, population stress, impacts on migration routes, and habitation fragmentation) are identified as potential effects. This applies to both Caribou populations (Boreal and Eastern Migratory) as well.</p> <p>An assessment of cumulative effects will be completed for the EA/IA as indicated in Section 25.13 (Cumulative Effects). The results of the cumulative effects assessment (which will include current and anticipated projects and activities) will be presented in the EAR/IS.</p>   | Section 25.11.1, Section 25.13                                 | Section 22, Appendix C                        |

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| 13       | Concerns about the residual effects to individual, local or regional populations of species at risk and their habitat.   | <p>The Project is undergoing a provincial environmental assessment under the Ontario <i>Environmental Assessment Act</i>, and is expected to require an impact assessment under the federal <i>Impact Assessment Act</i>. As described in Section 25.11.1 (Potential Effects), potential effects on Species at Risk, including but not limited to those identified in this issue, will be considered and assessed during the EA/IA.</p> <p>More baseline data and project design information is required before a detailed assessment of potential effects can be conducted. Additional information on the potential effects, mitigation measures, and residual effects regarding Species at Risk will be included in the EAR/IS.</p> | Section 25.11.1  | Appendix C                                    |
| 14       | <p>Request for information on potential effects on wildlife populations from:</p> <ul style="list-style-type: none"> <li>› mortality, including from vehicular collisions, as increased mortality may lead to population decline and impacts on genetic diversity (especially for large mammals, such as ungulates);</li> <li>› sensory disturbances from project activities or components, over the life of the Project that may lead to the spread of white-nose syndrome in bats, and other disturbances such as noise effects from road traffic or blasting;</li> <li>› changes to migration patterns;</li> <li>› increased public access, including access for recreational hunting; and</li> </ul> | <p>As discussed in Section 25.8.1 (Wildlife and Wildlife Habitat - Potential Effects), Section 25.9.1 (Birds and Bird Habitat - Potential Effects), and Section 25.11.1 (Species at Risk - Potential Effects), the effects identified in this issue have been identified and will be considered during the EA/IA.</p> <p>More baseline data and project design information is required before a detailed assessment of potential effects can be conducted. Additional information on the potential effects, mitigation measures, and residual effects regarding the effects identified in this issue will be included in the EAR/IS.</p>  | Section 25.8.1, Section 25.9.1, Section 25.11.1                | Appendix C                                    |



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|          | <ul style="list-style-type: none"> <li>› loss, alteration or fragmentation of habitats (including wetlands and upland habitats).</li> </ul>  |  |  |   |
| 15       | <p>Commented that the transition zone between the James Bay Lowlands and the Ontario Shield is a critical area for species with larger habitat ranges.</p>   | <p>The Project is undergoing a provincial environmental assessment under the Ontario <i>Environmental Assessment Act</i>, and is expected to require an impact assessment under the federal <i>Impact Assessment Act</i>. As described in Section 25.11.1 (Potential Effects), potential effects on Species at Risk will be considered and assessed during the EA/IA. The proponent recognizes the importance of the transition zone between the James Bay Lowlands and the Ontario Shield to species with larger habitat ranges. As indicated in Section 16.2.5.1 (Preliminary Baseline Description): "The Project includes areas of transition between the Boreal Forest and the Canadian Shield and provides important habitat for many of these Species at Risk which have large home ranges (such as Caribou and Wolverine)."</p> <p>More baseline data and project design information is required before a detailed assessment of potential effects can be conducted. Additional information on the potential effects, mitigation measures, and residual effects regarding Species at Risk will be included in the EAR/IS.</p> | <p>Section 16.2.5.1,<br/>Section 25.11.1</p>                   | <p>Appendix C</p>                             |
| 16       | <p>Need for information on potential effects from changes to forested land (e.g., impacts to species of importance to Indigenous communities) and clarity on the mitigation measures proposed to minimize adverse effects.</p> | <p>The Project is undergoing a provincial environmental assessment under the Ontario <i>Environmental Assessment Act</i>, and is expected to require an impact assessment under the federal <i>Impact Assessment Act</i>. As described in Section 25.10.1 (Potential Effects), potential effects on land cover, including but not limited to those identified in this issue (forested land), will be considered and assessed during the EA/IA. Preliminary potential effects to Indigenous communities are identified in Section 23.2.1 (Potential Effects) and preliminary potential effects to wildlife and wildlife habitat are identified in Section 25.8.1 (Potential Effects).</p> <p>More baseline data and project design information is required before a detailed assessment of potential effects can be conducted. Additional information on the potential effects to both Plant and Vegetation Communities, as well as their importance to Indigenous communities will be included in the EAR/IS.</p>  | <p>Section 23.2.1,<br/>Section 25.8.1,<br/>Section 25.10.1</p> | <p>Appendix C</p>                             |

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| 17   | Concerns about potential effects on forests from vegetation clearing, edge effects, and changes to hydrology and soil (e.g., quality, loss, compaction and erosion).  | <p>The Project is undergoing a provincial environmental assessment under the Ontario <i>Environmental Assessment Act</i>, and is expected to require an impact assessment under the federal <i>Impact Assessment Act</i>. As described in Section 25.10.1 (Potential Effects), potential effects on forests and wetlands (including those from clearing, edge effects, and changes to hydrology and soils), will be considered and assessed during the EA/IA.</p> <p>A potential effect is included in Section 25.10.1 (Potential Effects) and Appendix G (Summary of Potential Effects and Preliminary Proposed Mitigation Measures) for the Construction phase as following: "Habitat degradation, including changes to areas of edge habitat caused by alterations in hydrology patterns, changes to soils, erosion, dust and air emissions, vegetation changes, reductions in habitat connectivity, and habitat fragmentation."</p> <p>More baseline data and project design information is required before a detailed assessment of potential effects can be conducted. Additional information on the potential effects to both Plant and Vegetation Communities will be included in the EAR/IS.</p> | Section 25.10.1, Appendix G                                    | Appendix C                                    |
| 18   | Concerns about potential effects on native and rare vegetation due to dust from project activities (including road use), the application of herbicides during all project phases and from the introduction of invasive plant species. | <p>As discussed in Section 25.10.1 (Potential Effects), the effects of dust deposition on vegetation and introduction of invasive species will be considered in the EA/IA.</p> <p>More baseline data and project design information is required before a detailed assessment of potential effects can be conducted. Additional information on the potential effects to both Plant and Vegetation Communities will be included in the EAR/IS. The effects of herbicide use will be considered if it is determined it is required for the project, but at this time is not currently being considered.</p>  | Section 25.10.1  | Appendix C                                    |
| <b>Climate Change and Greenhouse Gas Emissions</b> |   |   |  |   |
| 19   | Need for additional information on all sources of greenhouse gas emissions associated with the Project and on the methods to estimate them, to demonstrate  | <p>As indicated in Section 8.2 (Strategic Assessment of Climate Change) the proponent will conduct a strategic assessment of climate change for the Project following ECCC guidance.</p> <p>As indicated in Section 29 (Greenhouse Gas Emissions Estimate), all Project-related sources of greenhouse gas emissions during both</p>   | Section 8.2, Section 29  | Section 8.2, Section 27                       |

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|          | <p>how the requirements of the latest Strategic Assessment of Climate Change guidance document would be met.</p>  | <p>construction (e.g., land clearing, construction vehicle tailpipe emissions, aggregate extraction and transportation) and operation phases (e.g., maintenance-related tailpipe emissions, vehicle emissions) will be described and assessed in the EAR/IS. Greenhouse gas emissions will be quantified in accordance with relevant methodologies such as ECCC's Greenhouse Gas Reporting Program and other relevant methods.</p>  |  |   |
| 20       | <p>Need for further information about the project-related effects from land use change and loss or disruption of carbon storage function, including:</p> <ul style="list-style-type: none"> <li>› quantification of net greenhouse gas emissions, including from impacts on above-ground and below-ground carbon stocks in the boreal forests, soils, and peatlands;</li> <li>› hydrological assessment of how impacts to wetlands (including peatlands and muskeg) would influence both carbon stocks and the ability to continue to sequester carbon into the future;</li> <li>› proposed mitigation measures to minimize loss of carbon storage function, greenhouse gas emissions and effects to climate change; and</li> </ul> | <p>The Project is undergoing a provincial environmental assessment under the Ontario <i>Environmental Assessment Act</i>, and is expected to require an impact assessment under the federal <i>Impact Assessment Act</i>. More baseline data and project design information is required before a detailed assessment of potential Projects effects can be conducted and mitigation measures can be developed. The items included in this issue are discussed in the DPD as following:</p> <ul style="list-style-type: none"> <li>› Section 29 (Greenhouse Gas Emissions Estimate) provides a preliminary conservative estimate of GHG emissions for the operations phase. A detailed estimate of GHG emissions for all Project phases, along with an assessment of changes in sources and carbon sinks from the clearing of vegetation and disturbance of peatlands/wetland, will be provided in the EAR/IS.</li> <li>› Section 8.2.1.1 (Initial and Detailed Project Description) provides the Project activities that may affect carbon sinks by Project phase. Potential effects to carbon sinks will be assessed in the EAR/IS under multiple components of the environment.</li> <li>› Section 25.5.1 (Potential Effects) provides information on the hydrological assessment that will be conducted during the EA/IA. Peatlands will be considered in the surface water, groundwater, plants and vegetation communities, geology, terrain and soils, and climate change assessments.</li> <li>› Preliminary mitigation measures related to loss of carbon sinks are presented in Section 25.2.2 (Preliminary Proposed Mitigation), Section 25.4.2 (Preliminary Proposed Mitigation), and Section 25.10.2 (Preliminary Proposed Mitigation). Further information on mitigation measures related to loss of carbon sinks will be provided in the EAR/IS.</li> </ul> | <p>Section 8.2, Section 8.2.1.1, Section 25.2.1, Section 25.2.2, Section 25.4.2, Section 25.5.1, Section 25.10.2, Section 29</p> | <p>Section 8.2, Section 8.2.1.1, Section 29, Appendix C</p> |

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|   | <ul style="list-style-type: none"> <li>› implications of the Project to Canada’s national greenhouse gas inventory.</li> </ul>  | <ul style="list-style-type: none"> <li>› As described in Section 8.2 (Strategic Assessment of Climate Change) the proponent will conduct a strategic assessment of climate change for the Project following ECCC guidance.</li> <li>› As indicated in Section 25.2.1 (Potential Effects), anticipated Project GHG emissions will be quantified and compared against sectoral and federal totals.</li> </ul>  |  |   |
| <b>Indigenous Peoples' Spiritual, Physical, and Cultural Heritage</b> |   |  |  |   |
| 21  | <p>Concerns about the potential effects to Indigenous cultural heritage, practices and ways of life, including the right to self-govern and speak traditional languages, due to project activities and the increased traffic for industrial and public-access purposes.</p> | <p>The Project is undergoing a provincial environmental assessment under the Ontario <i>Environmental Assessment Act</i>, and is expected to require an impact assessment under the federal <i>Impact Assessment Act</i>. More baseline data and project design information is required before a detailed assessment of potential Projects effects can be conducted and mitigation measures can be developed.</p> <p>As described in Sections 23.1 (Potential Effects - Cultural Heritage Resources) and 23.2 (Potential Effects - Aboriginal and Treaty Rights and Interests) and Appendix G (Summary of Potential Effects and Preliminary Proposed Mitigation Measures), potential effects to Indigenous cultural heritage, practices, and ways of life including related concerns, due to Project activities and increased traffic for industrial and public-access purposes will be considered and assessed in the EA/IA.</p> <p>As discussed on Section 17.4.2 (Proposed Baseline Studies), an Indigenous Knowledge (IK) Program will be conducted to collect IK/Indigenous Land and Resource Use (ILRU) information for consideration and incorporation into the EA/IA. Additional information on the potential effects to Indigenous cultural heritage, practices, and ways of life as well as related concerns will be included in the EAR/IS.</p> | <p>Section 17.4.2, Section 23.1, Section 23.2, Appendix G</p>  | <p>Appendix C</p>                             |

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| 22       | <p>Concerns about potential effects to waterways, including features such as rapids, and landforms of cultural importance and the way of life of local Indigenous communities, including due to:</p> <ul style="list-style-type: none"> <li>› proposed watercourse crossings (particularly on the Attawapiskat River)</li> <li>› geotechnical and borehole drilling on eskers, and changes to the land.</li> </ul> | <p>The Project is undergoing a provincial environmental assessment under the Ontario <i>Environmental Assessment Act</i>, and is expected to require an impact assessment under the federal <i>Impact Assessment Act</i>. More baseline data and project design information is required before a detailed assessment of potential Project effects can be conducted and mitigation measures can be developed.</p> <p>Table 11-2 (Summary of Project Activities by Phase) provides Project activities, including construction of water crossings and earthworks. Potential effects related to these project activities are further described in Appendix G (Summary of Potential Effects and Preliminary Proposed Mitigation Measures) and will be further assessed in the EAR/IS.</p> <p>Geotechnical drilling required to support preliminary engineering design has commenced and is subject to permitting by multiple agencies including MECP, MNRF and Ontario Parks.</p>   | Table 11-2, Section 23.2.1, Section 25.11.1                    | Table 11-2, Appendix C                        |
| 23       | <p>Concerns about potential impacts to cultural, spiritual and sacred sites, from potential project-related changes to the watershed and muskeg.</p>   | <p>The Project is undergoing a provincial environmental assessment under the Ontario <i>Environmental Assessment Act</i>, and is expected to require an impact assessment under the federal <i>Impact Assessment Act</i>. More baseline data and project design information is required before a detailed assessment of potential Projects effects can be conducted and mitigation measures can be developed.</p> <p>As described in Section 23.1 (Potential Effects - Cultural Heritage Resources) and Section 23.2 (Potential Effects - Aboriginal and Treaty Rights and Interests), potential impacts to cultural, spiritual, and sacred sites, from potential project-related changes to the environment, including surface water, groundwater, and plants and vegetation communities (e.g., muskeg) will be considered and assessed during the EA/IA.</p> <p>As indicated in Section 17.4.2 (Proposed Baseline Studies), an IK Program will be conducted to collect IK/ILRU information for consideration and incorporation into the EA/IA and additional information on potential impacts to cultural, spiritual, and sacred sites, from potential project-related changes to the watershed and muskeg will be included in the EAR/IS.</p> | Section 17.4.2, Section 23.1, Section 23.2                     | Appendix C                                    |

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| 24   | Concerns about potential impacts to Indigenous communities and their ability to preserve and transfer their traditional and cultural knowledge to future generations.   | As described in Section 23.2.1 (Potential Effects) and Appendix G (Summary of Potential Effects and Preliminary Proposed Mitigation Measures), potential impacts to Aboriginal and Treaty Rights and Interests, the ability of Indigenous communities to preserve and transfer their traditional and cultural knowledge to future generations, will be considered and assessed during the EA/IA. As indicated in Section 17.4.2 (Proposed Baseline Studies), an IK Program will be conducted to collect IK/ILRU information for consideration and incorporation into the EA/IA and additional information on the potential impacts to Indigenous communities and their ability to preserve and transfer their traditional and cultural knowledge to future generations will be included in the EAR/IS. | Section 17.4.2, Section 23.2.1, Appendix G                     | Appendix C                                    |
| <b>Indigenous Peoples' Current Use of Lands and Resources for Traditional Purposes</b> |   |  |  |   |
| 25   | Request for information about the plans for re-purposing cleared materials such as vegetation, including trees and plants used for traditional medicines.   | As indicated in Table 28-1 (Summary of Preliminary Component Management Plans) the proponent will develop multiple management plans for the project. Re-purposing of cleared materials, where re-purposing is possible, will be included in the Vegetation Management Plan and the Aboriginal Rights and Interests Impact Management Plan.   | Table 28-1   | Table 26-1                                    |
| 26   | <p>Concerns about the potential effects on hunting, trapping, fishing, gathering, and spiritual practices and cultural teachings, including:</p> <ul style="list-style-type: none"> <li>› changes to the current use of traditional lands, waterbodies, and areas of historical importance to Indigenous communities;</li> <li>› ease of access by non-Indigenous peoples to Indigenous traditional territories;</li> </ul> | As described in Section 23.2.1 (Potential Effects) and Appendix G, potential effects on Aboriginal and Treaty Rights and Interests, which includes hunting, trapping, fishing, gathering, and spiritual practices and cultural teachings, will be considered and assessed during the EA/IA. As indicated in Section 17.4.2 (Proposed Baseline Studies), an IK Program will be conducted to collect IK/ILRU information for consideration and incorporation into the EA/IA and additional information on the potential effects on hunting, trapping, fishing, gathering, and spiritual practices and cultural teachings will be included in the EAR/IS.   | Section 17.4.2, Section 23.2.1, Appendix G                     | Appendix C                                    |

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|                      | <ul style="list-style-type: none"> <li>› loss of access to traditional lands (e.g., from potential changes to navigability, the Project overprinting traditional territories); and</li> <li>› changes to the way of life and traditional use of land by future generations.</li> </ul> |   |  |   |
| <b>Country Foods</b> |  |   |  |   |
| 27                   | Request for the development or support of a dietary and food security survey, including a traditional food harvesting study for Indigenous communities whose access would be affected, to determine potential food security issues and impacts to the health of community members.     | <p>As described in Section 17.1.1 (Preliminary Baseline Description), the human health assessment will draw on knowledge gathered with respect to country foods and community diet. As part of the IK collection program, Indigenous communities will be consulted for further information on dietary patterns. As indicated in Section 17.1.2 (Proposed Baseline Studies), the proponent plans to conduct numerous surveys to collect information that will include questions on foods security and harvesting practices to provide information to support various VC assessments (e.g., Socio-economic, Human Health, Aboriginal and Treaty Rights and Interests).</p> <p>As described in Section 23.2 (Potential Effects) and Appendix G (Summary of Potential Effects and Preliminary Proposed Mitigation Measures), concerns about effects on the access, quality, and availability of country foods will be considered and assessed during the EA/IA. As indicated in Section 17.4.2 (Proposed Baseline Studies), an IK Program will be conducted to collect IK/ILRU information for consideration and incorporation into the EA/IA and additional information on the potential effects on the access, quality, and availability of country foods will be included in the EAR/IS.</p> | Section 17.1.1, Section 17.1.2, Section 17.4.2, Section 23.2   | Appendix C                                    |

| Item No.   | Summary of Issue  | Proponent Response   | Cross-Reference to Section of the Detailed Project Description | Cross-Reference to Section of the Summary DPD |
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| 28   | Concerns about effects on the access, quality and availability of country foods, including wildlife (such as caribou), plants and traditional medicines.  | As described in Section 23.2 (Potential Effects) and Appendix G (Summary of Potential Effects and Preliminary Proposed Mitigation Measures), concerns about effects on the access, quality, and availability of country foods will be considered and assessed during the EA/IA. As indicated in Section 17.4.2 (Proposed Baseline Studies), an IK Program will be conducted to collect IK/ILRU information for consideration and incorporation into the EA/IA and additional information on the potential effects on the access, quality, and availability of country foods will be included in the EAR/IS.  | Section 23.2, Appendix G                                       | Appendix C                                    |
| 29   | Concerns about the potential effects on human health from consuming country food contaminated through soil and water, including from increased mercury methylation processes in wetlands, stemming from project activities. | As described in Section 17.1.2 (Proposed Baseline Studies), if the problem formulation step of the Human Health Risk Assessment (which is the initial component of the overall human health assessment) identifies that an assessment of country food consumption is required, a country foods tissue sampling program will be developed to generate primary data on potential Project-related contaminant levels in country foods. This program will involve working with Indigenous communities to collect appropriate tissue samples from commonly harvested country food items. If deemed necessary, this will include mercury and methylmercury. However, there is no reason to suspect at this time that Project activities will enhance or increase mercury methylation rates beyond that which occurs presently. This topic will be further addressed in the EAR/IS. | Section 17.1.2   | N/A   |
| <b>Structures, Sites, Things of Historical, Archaeological, Paleontological, or Architectural Significance to Indigenous Peoples</b> |   |  |  |   |
| 30   | Request for the Proponent to determine the location of any structure, site or things of historical, archaeological, paleontological, or architectural significance in consultation with Indigenous communities.             | Through the Consultation and Engagement Plan and the Indigenous Knowledge Program, the proponent aims to collaborate with Indigenous communities to identify any structure, site or things of historical, archaeological, paleontological, or architectural significance in consultation with Indigenous communities.<br><br>In addition, as indicated in Section 17.3.2 (Proposed Baseline Studies), the Cultural Heritage Baseline Study will include a Stage 1 Archaeological Assessment that will document existing archaeological sites and identify areas of archaeological potential. Should results of the Stage 1 Archaeological Assessment confirm archaeological potential within the corridor of the preferred alternative route, a Stage 2 Archaeological Assessment would be completed as early as possible before detailed Project design is completed.       | Section 17.3.2   | N/A   |



| Item No.   | Summary of Issue   | Proponent Response  | Cross-Reference to Section of the Detailed Project Description | Cross-Reference to Section of the Summary DPD |
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| 31   | Request for the Proponent to complete an archeological assessment.   | As indicated in Section 17.3.2 (Proposed Baseline Studies), the Cultural Heritage Baseline Study will include a Stage 1 Archaeological Assessment that will document existing archaeological sites and identify areas of archaeological potential. Should results of the Stage 1 Archaeological Assessment confirm archaeological potential within the corridor of the preferred alternative route, a Stage 2 Archaeological Assessment would be completed as early as possible before detailed Project design is completed. The results of the Stage 2 Archaeological Assessment would inform the need for further archaeological investigations where the effects to identified archaeological resources cannot be avoided through detail design.   | Section 17.3.2   | N/A   |
| <b>Indigenous Peoples' Exercise of Aboriginal and/or Treaty Rights</b> |  |   |  |   |
| 32   | See sections on Current Use of Lands and Resources for Traditional Purposes; Human Health and Well-being; and Spiritual, Physical and Cultural Heritage.   | Please see the responses to sections on Current Use of Lands and Resources for Traditional Purposes; Human Health and Well-being; and Spiritual, Physical and Cultural Heritage.  | N/A  | N/A   |
| 33   | Comment that the Detailed Project Description should state explicitly all Indigenous peoples engaged by the Proponent have rights under section 35 of the <i>Constitution Act, 1982</i> , not just the Proponent communities, and should list all Indigenous communities in a non-hierarchical format. | As indicated in Section 4.1 (Indigenous Communities and Groups Identified for Consultation and Engagement), the proponent acknowledges that according to Section 35 of the <i>Constitution Act</i> :<br><ul style="list-style-type: none"> <li>(1) The existing aboriginal and treaty rights of the aboriginal peoples of Canada are hereby recognized and affirmed.</li> <li>(2) In this Act, aboriginal peoples of Canada includes the Indian, Inuit and Métis peoples of Canada.</li> </ul> Section 4.1 (Indigenous Communities and Groups Identified for Consultation and Engagement) lists Indigenous communities and groups in alphabetical order not hierarchical order. As per the footnote in Section 4.1, the Agency provided a list of Indigenous communities and organizations whose Aboriginal and/or treaty rights may be affected by the Project or who may have an interest in the Project (17 communities). These communities and organizations are identified with an asterisk. | Section 4.1  | Section 4.1                                   |

| Item No.  | Summary of Issue  | Proponent Response   | Cross-Reference to Section of the Detailed Project Description | Cross-Reference to Section of the Summary DPD |
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| <b>Indigenous Knowledge</b>                                   |   |  |  |   |
| 34  | Concerns about the Proponent not incorporating Indigenous Knowledge into planning, management, and operational decisions, as well as during environmental data collection, within monitoring studies and when identifying mitigation measures related to environmental, social, economic and health impacts stemming from the Project and other activities or potential developments. | <p>As described in Section 17.4.2, an IK Program will be conducted to collect IK/Indigenous Land and Resource Use (ILRU) information and incorporate it throughout the EA/IA.</p> <p>The IK Program is a critical component of the information base upon which the assessment will be conducted. The information generated through the IK Program will be used in concert with western scientific approaches to form the foundation for characterizing baseline conditions, predicting potential project impacts, and determining appropriate mitigation and monitoring methods. The program will include collection of existing IK/ILRU information as well as completion of Project-specific studies. The IK Program will provide funding for Indigenous communities, and work with communities where requested, to collect IK relevant to the various technical disciplines and support the meaningful integration of IK throughout the EA/IA and Project planning.</p> <p>In addition, the proponent has and will continue to provide opportunities for Indigenous communities to participate in field programs, where possible.</p> | Section 17.4.2   | N/A   |
| 35  | Concerns with how the Proponent would ensure the privacy and confidentiality of shared Indigenous Knowledge and other information deemed sensitive.   | As described in Section 17.4.2 (Proposed Baseline Studies), it is anticipated that all IK and information on ILRU shared through the program will be governed by IK Sharing Agreements that indicate how confidential/sensitive information will be used to inform the effects assessment but will be protected from public or third-party disclosure.   | Section 17.4.2   | N/A   |
| <b>Indigenous and Stakeholder Engagement and Consultation</b> |   |  |  |   |
| 36  | Commented that First Nation communities are eligible for Economic Development and Infrastructure Funding.   | The proponent acknowledges that First Nation communities are eligible for Economic Development and Infrastructure Funding.   | N/A  | N/A   |

| Item No. | Summary of Issue   | Proponent Response  | Cross-Reference to Section of the Detailed Project Description | Cross-Reference to Section of the Summary DPD    |
|----------|--|---|--|--|
| 37       | <p>Concerns about Indigenous communities being adequately supported to participate in engagement and consultation activities throughout the federal impact assessment process, including by:</p> <ul style="list-style-type: none"> <li>› having access to sufficient and timely capacity funding;</li> <li>› being provided with sufficient time to provide comments; and</li> <li>› being shown consideration for the challenges Indigenous communities face, such as community emergencies, poor bandwidth and consultation fatigue.</li> </ul> | <ol style="list-style-type: none"> <li>1. Please see the response to Issue #38 for information on funding.</li> <li>2. The proponent has supported extensions to time periods for comments during both the Draft ToR and Proposed ToR periods. The proponent will continue to work with Indigenous communities to provide adequate time periods for communities to provide feedback, while also balancing progressing the overall Project schedule.</li> <li>3. The proponent has developed a consultation and engagement program that considers the challenges Indigenous communities face. As indicated in Table 4-1 (Consultation and Engagement Activities to Date – Indigenous Communities), to date, the proponent has engaged with Indigenous communities through various methods. The proponent will continue to consult and engage with interested Indigenous communities, organizations and groups through the development of the EA/IA using a variety of tools as described in Table 6-1 (Communication and Engagement Tools). As indicated in Section 6.3.1 (General Engagement Principles), consultation and engagement activities will be transparent and flexible. As indicated in Section 4.3 (Plan for Future Consultation and Engagement), consultation and engagement activities planned in the future will be tailored to Indigenous communities, organizations and groups whose input is required.</li> </ol> | Table 4-1, Section 4.3, Table 6-1, Section 6.3.1               | Table 4-1, Section 4.3, Table 6-1, Section 6.3.1 |
| 38       | <p>Concerns about adequate support being provided to Indigenous communities to conduct studies on the use of lands and resources to inform the federal impact assessment process.</p>  | <p>Funding to support IK/ILRU studies is available from both the Province of Ontario and the proponent. The provincial funding Initiative supports three key areas:</p> <ul style="list-style-type: none"> <li>› Indigenous knowledge and land use studies to identify and evaluate potential impacts to traditional land uses and asserted Aboriginal or treaty rights associated with the Project;</li> <li>› Community engagement and participation in the review and consultation activities related to the terms of reference; and,</li> <li>› Community engagement and participation in the review and consultation activities related to the environmental assessment phase (should the terms of reference be approved).</li> </ul> <p>The proponent welcomes the opportunity to meet with interested Indigenous communities to discuss funding.</p>   | N/A  | N/A  |

| Item No. | Summary of Issue   | Proponent Response   | Cross-Reference to Section of the Detailed Project Description | Cross-Reference to Section of the Summary DPD |
|----------|--|--|--|---|
| 39       | <p>Request that engagement activities be conducted respectfully of Indigenous protocols by incorporating:</p> <ul style="list-style-type: none"> <li>› any existing Consultation and/or Engagement Protocols that Indigenous communities have shared with the Proponent; and</li> <li>› individual Indigenous community's preferences for engagement and consultation throughout the assessment process, including language preferences and health and safety measures that should be followed.</li> </ul> | <p>As described in Section 6.3.2 (Guiding Principles for Engagement), the proponent has a mutual recognition of inherent rights, ancestral knowledge, traditional knowledge and practices, clan families and relationships, sustainable livelihood and traditional protocols. The proponent will conduct consultation and engagement in accordance with participating Indigenous communities' individual protocols to the extent possible if they are available and shared. To ensure greater understanding and participation, the proponent strives to include translators and ensure health and safety protocols are adhered to.</p> | Section 6.3.2  | Section 6.3.2                                 |
| 40       | <p>Request that in-person engagement activities be offered at multiple locations, on multiple dates, in each of the surrounding communities that would be impacted by the Project.</p>   | <p>As described in Table 6-1 (Communication and Engagement Tools), the proponent will use a variety of tools to provide information and receive input from Indigenous communities and organizations, such as in-person community meetings in multiple locations including in-community and off-reserve. As indicated in Table 6-2 (Consultation Milestones), consultation and engagement will be held at multiple milestones of the EA/IA.</p>   | Table 6-1, Table 6-2   | Table 6-1, Table 6-2                          |
| 41       | <p>Request for involvement of, and transparent information sharing with, Indigenous communities (particularly with knowledge holders and youth) regarding baseline data collection (e.g., archeological baseline studies), spatial boundaries and study areas, and other project-related information used to inform the federal impact assessment process.</p>   | <p>As described in Section 26 (Effects Assessment Methods), various study plans will be prepared to provide more detail on specific Valued Component assessments. Plain language fact sheets summarizing each study plan will be prepared and presented for input early in the EA/IA as part of the Consultation and Engagement Program. Fact Sheets for each study plan will be provided as supportive hand-out at Indigenous and public open house events, posted on the project website, and presented at livestreaming and radio information sessions to provide an opportunity for comment and discussion.</p>                    | Section 26   | Section 24                                    |

| Item No. | Summary of Issue  | Proponent Response  | Cross-Reference to Section of the Detailed Project Description                         | Cross-Reference to Section of the Summary DPD |
|----------|---|---|--|---|
| 42       | Request for the Proponent to share baseline data and project-related information with potentially impacted Indigenous communities, particularly regarding wildlife matters of importance to the communities (such as caribou and the collaring program), to increase understanding and trust of the approach used, collect input from the communities and comply with Ownership, Control, Access and Possession principles. | Sharing agreements are mentioned in Sections 16.2.1.2, 16.2.3.2, 16.2.4.2, and 16.2.5.2 (Proposed Baseline Studies). The proponent will continue to sign confidential sharing agreements with participating Indigenous communities regarding sensitive data, such as the caribou collaring program and other baseline data and other project-related information. The sharing agreements will comply with the spirit of Ownership, Control, Access and Possession (OCAP) principles.  | Section 16.2.1.2, Section 16.2.3.2, Section 16.2.4.2, Section 16.2.5.2, Section 17.4.2 | N/A   |
| 43       | Concerns about how Indigenous customs would be considered, including worldviews and laws, to inform decisions made about the Project.   | As referenced in Section 6.3.3 (Marten Falls First Nation Elders' Guiding Principles) and Section 6.3.4 (Webequie First Nation Three-Tier Approach), the proponent will adhere to a combination of mutual guiding principles of MFFN and WFN. Elders from both communities provided guidance to the proponent to honour the traditional lands in which this Project will be developed. This includes to respect the traditional teachings of these communities, including to "respect the natural and Anishinaabe customs and teachings at all times". These teachings (i.e., laws) will be utilized to inform decisions about the Project. Other worldviews of those Indigenous communities which the proponent is consulting with will be respected throughout the EA/IA process. | Section 6.3.3, Section 6.3.4   | Section 6.3.3, Section 6.3.4                  |

| Item No. | Summary of Issue  | Proponent Response  | Cross-Reference to Section of the Detailed Project Description          | Cross-Reference to Section of the Summary DPD                           |
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| 44       | Comments about the importance of establishing and maintaining good relationships and a unified approach to consultation between Indigenous communities in the region, whether they support or oppose development in the Ring of Fire area.  | The Proponent’s Guiding Principles are described in Section 6.3.1 (General Engagement Principles), Section 6.3.2 (Guiding Principles for Engagement), Section 6.3.3 (Marten Falls First Nation Elders’ Guiding Principles), and Section 6.3.4 (Webequie First Nation Three-Tier Approach). These principles outline the importance of respectful relationships with affected Indigenous communities as well as managing issues, comments and questions, which will be documented in the RoC. The proponent is committed to ongoing discussions and proposed issue resolution approaches as described in Section 6.5 (Issues Resolution), which will be documented to record the issue resolution process for any issues raised.   | Section 6.3.1, Section 6.3.2, Section 6.3.3, Section 6.3.4, Section 6.5 | Section 6.3.1, Section 6.3.2, Section 6.3.3, Section 6.3.4, Section 6.5 |
| 45       | Request for the adequate involvement of potentially impacted Indigenous communities throughout the federal impact assessment process, including in the determination of the project definition and spatial and temporal boundaries, the selection of valued components and mitigation measures, the validation that concerns raised have been substantially addressed, and in shared decision-making. | <p>Through the Consultation and Engagement Program, potentially impacted Indigenous communities will be consulted throughout the EA/IA.</p> <p>Table 3-1 (Consultation and Engagement Activities to Date) and Table 4-1 (Consultation and Engagement Activities to Date – Indigenous Communities) show consultation conducted to date with federal and provincial agencies, and Indigenous communities, respectively. As shown in Table 6-2 (Consultation Milestones) the proponent plans to consult Indigenous communities, stakeholders and interested persons on:</p> <ul style="list-style-type: none"> <li>› Baseline Data Collection;</li> <li>› Identification of Alternatives;</li> <li>› Evaluation of Alternatives;</li> <li>› Selection of Preferred Methods;</li> <li>› Preliminary Effects Assessment; and</li> <li>› Cumulative Effects Assessment.</li> </ul> <p>A preliminary consultation schedule is provided in Table 6-3 (Proposed EA/IA Consultation and Engagement Schedule).</p> | Table 3-1, Table 4-1, Table 6-3   | Table 3-1, Table 4-1, Table 6-3   |

| Item No. | Summary of Issue  | Proponent Response  | Cross-Reference to Section of the Detailed Project Description                                  | Cross-Reference to Section of the Summary DPD                       |
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| 46       | Comments about meaningful and ongoing Proponent-led engagement with off-reserve and on-reserve members of Indigenous communities, including the community leadership, in a manner that enables full and free participation.   | The proponent will continue to provide engagement opportunities both off-reserve and on-reserve with all interested Indigenous participants, following the General Engagement Principles described in Section 6.3 (Guiding Principles). Table 6-1 (Communication and Engagement Tools) describes the proponent's methods to engage with both on-reserve and off-reserve members of communities, including community leadership.   | Section 6.3, Table 6-1  | Section 6.3, Table 6-1  |
| 47       | Need for meaningful Indigenous consultation and Proponent-led engagement throughout the federal impact assessment process (including during the definition of project design and spatial and temporal boundaries), that takes into consideration Indigenous Knowledge, the capacity of Indigenous communities and the traditional land and resource uses of potentially impacted Indigenous communities, and allows for verification of how input from Indigenous communities are reflected in documents prepared for the assessment process. | <p>The response to Issue #44 describes the proponent's engagement principles to set the stage for meaningful consultation and engagement.</p> <p>The proponent has conducted various engagement activities during development of the provincial Terms of Reference for the Project, as described in Table 3-1 (Consultation and Engagement Activities to Date), Table 4-1 (Consultation and Engagement Activities to Date – Indigenous Communities), Table 6-3 (Proposed EA/IA Consultation and Engagement Schedule), Appendix D (Summary of Key Issues Raised during the Terms of Reference Stage of the Provincial Environmental Assessment Process), and Appendix E (Additional Information on Consultation and Engagement with Indigenous Communities and Groups). The proponent plans to further engage with Indigenous communities on the effects assessment methods as well as through the EA/IA process, as indicated in Table 6-2 (Consultation and Engagement Milestones).</p> <p>The response to Issue #37 provides information on how the proponent has taken into consideration the capacity of Indigenous communities.</p> <p>As described in Section 4.3 (Plan for Future Consultation and Engagement), "through the Consultation and Engagement Plan and the Indigenous Knowledge Program (see Section 17.4.2), the proponent aims to collaborate with Indigenous communities in characterizing baseline conditions, predicting potential project impacts, and determining appropriate mitigation and monitoring methods. The proponent will collect and include input provided by Indigenous communities during multiple stages of the EA/IA through the Consultation and Engagement Plan and the Indigenous Knowledge Program."</p> | Table 3-1, Table 4-1, Section 4.3, Table 6-2, Table 6-3, Section 17.4.2, Appendix D, Appendix E | Table 3-1, Table 4-1, Section 4.3, Table 6-2, Table 6-3, Appendix A |

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|          |  | As described in Section 17.4.2 (Proposed Baseline Studies), the proponent is developing an IK Guidance Document which describes our plans to work with Indigenous communities to validate or confirm that the information collected has been documented accurately in the EAR/IS.  |  |   |
| 48       | <p>Need for all engagement activities to be meaningful that encourages participation from Indigenous communities through two-way communication, in order to gather input that informs the Proponent's conduct in the federal impact assessment. Examples of meaningful engagement include:</p> <ul style="list-style-type: none"> <li>› in-community meetings where oral information can be submitted;</li> <li>› allowing for participants to lead engagement sessions to share information;</li> <li>› providing clarity on how information, including Indigenous Knowledge, can be shared, and how it would be used to ensure it is not reworded or misrepresented;</li> <li>› incorporating views from Indigenous communities on the use of studies conducted by the communities; and</li> <li>› incorporating views on the project alternatives.</li> </ul> | <ol style="list-style-type: none"> <li>1. As described in Table 6-1 (Communication and Engagement Tools), the proponent will use a variety of tools to provide information and receive input from Indigenous communities, including in-person community meetings.</li> <li>2. On April 6 and 7, 2023, the proponent sent a letter to Indigenous communities inviting them to provide feedback on their preferred engagement methods, such as focus groups, kitchen table sessions, community information sessions, as well as virtual options, with the aim of making engagement on the Project as accessible as possible for communities. The proponent also requested communities to provide their written consultation protocols or guidelines. With respect to allowing participants to lead engagement sessions to share information, the proponent welcomes the opportunity to meet with communities to discuss this further.</li> <li>3. As described in Section 17.4.2 (Proposed Baseline Studies), the proponent is developing an IK Guidance Document which describes how the proponent plans to work with Indigenous communities to validate or confirm that the information collected has been documented accurately in the EAR/IS.</li> <li>4. As described in Section 17.4.2 (Proposed Baseline Studies), an IK Program will be conducted to collect IK/ILRU information and incorporate it throughout the EA/IA. The program will include collection of existing IK/ILRU information as well as completion of Project-specific studies. The IK Program will provide funding for Indigenous communities, and the proponent can work with communities where requested, to collect IK relevant to the various technical disciplines and support the meaningful integration of IK throughout the EA/IA and Project planning.</li> <li>5. As indicated in Section 14.1 ("Alternatives Means" to Carry Out the Project), the proponent will conduct an assessment of alternative means</li> </ol> | Table 6-1, Section 14.1, Section 17.4.2                        | Table 6-1, Section 14.1,                      |



| Item No. | Summary of Issue   | Proponent Response   | Cross-Reference to Section of the Detailed Project Description | Cross-Reference to Section of the Summary DPD |
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|          |  | to carry out the Project. The assessment of alternative means of carrying out the Project will incorporate input from Indigenous communities, the public, stakeholders, and federal and provincial regulators, to be obtained through the consultation and engagement process, as well as IK/ILRU and other baseline data.   |  |   |
| 49       | Need for the Detailed Project Description to include information on the Proponent's engagement with Indigenous communities up to the submission of the Detailed Project Description, including any issues raised by Indigenous communities, as required in Schedule 2 of the <i>Information and Management of Time Limits Regulations</i> . Information in Appendix E of the Initial Project Description only covers engagement activities that took place up to April 2022. | Table 3-1 (Consultation and Engagement Activities to Date), Table 4-1 (Consultation and Engagement Activities to Date – Indigenous Communities), Table 6-3 (Proposed EA/IA Consultation and Engagement Schedule), and Appendix E (Additional Information on Consultation and Engagement with Indigenous Communities and Groups) have been updated to reflect all consultation activities that took place up to mid-April 2023.<br><br>Appendix D (Summary of Key Issues Raised during the Terms of Reference Stage of the Provincial Environmental Assessment Process) did not require updates as it already contained all key issues raised by Indigenous communities during the ToR stage in Table D-3 (Summary of Key Issues Raised by Indigenous Communities and Groups during the Terms of Reference Stage of the Provincial Environmental Assessment Process). The ToR comment period closed for Indigenous communities closed on December 14, 2022. | Table 3-1, Table 4-1, Table 6-3, Appendix E                    | Table 3-1, Table 4-1, Table 6-3               |
| 50       | Need for the Detailed Project Description to include information on the Proponent's schedule for future engagement with Indigenous communities.  | Table 6-3 (Proposed EA/IA Consultation and Engagement Schedule) presents the proponent's estimated dates for future engagement with Indigenous communities. The schedule is subject to change, and updates will be communicated to communities as well as posted on the Project website ( <a href="https://northernroadlink.ca/">https://northernroadlink.ca/</a> ).   | Table 6-3  | Table 6-3                                     |
| 51       | Request for the Detailed Project Description to include "self-determined" and "consensual" in the list of guiding principles for engagement with Indigenous communities.   | As described in Section 6.3.2 (Guiding Principles for Engagement), "Elders from both communities have provided guidance to the proponent so that consultation and engagement for the EA/IA is conducted in a respectful manner that reflects their culture and traditions of MFFN and WFN as Indigenous proponents of the Project."<br><br>Thank you for your suggestion.  | Section 6.3.2  | Section 6.3.2                                 |

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| 52  | <p>Comments on the Proponent's approach to engagement, including that engagement activities should consider barriers to participation for local, underrepresented groups.</p>   | <p>As described in Table 6-1 (Communication and Engagement Tools), the proponent will use a variety of tools to provide information and receive input from Indigenous communities.</p> <p>As indicated in Section 6.3.1 (General Engagement Principles), consultation and engagement activities will be inclusive and accessible. This includes providing and reasonably adjusting timeframes where necessary to consider working schedules, community meetings, in-person engagements as well as call-in options for those without a computer or reliable internet connection. Documents and materials will use language that is easy to understand and free of technical jargon and, where feasible, key documents/presentations may be translated into the Indigenous language of participating communities.</p> | Table 6-1, Section 6.3.1                                       | Table 6-1, Section 6.3.1                      |
| 53  | <p>Comment that the Proponent should have specific workshops and feedback sessions for Indigenous women, girls, and gender diverse individuals, and offer child-care onsite for individuals who have children and want to attend in-person.</p>       | <p>As indicated in Section 26 (Effects Assessment Methods), the proponent will identify potential interactions with the Project in relation to underrepresented groups through GBA+ and potential mitigation measures to address impacts as part of the EA/IA. The proponent plans to develop methods to collect disaggregated information through the GBA+ analysis.</p> <p>Consideration of GBA+ would be further described in the applicable study plans for the Project.</p> <p>The proponent will consider hosting workshops that allow for collaboration with Indigenous women and gender diverse individuals with child-care options. We welcome the opportunity to meet with community leadership and further discuss options for these workshops.</p>  | Section 26   | Section 24                                    |
| <b>Health Conditions of Indigenous and Non-Indigenous Peoples</b> |   |   |  |   |
| 54  | <p>Concerns about potential effects from biophysical pathways of exposure such as:</p> <ul style="list-style-type: none"> <li>› changes to air quality from vehicular emissions and dust, which can cause adverse impacts on human health;</li> </ul> | <p>As indicated in Section 17.1.2 (Proposed Baseline Studies) and Section 24.1.1 (Potential Effects) the potential effects to human health due to consumption of contaminated country food items, outdoor air/dust inhalation, and drinking water ingestion will be assessed in the human health risk assessment, as deemed necessary, given the types and environmental behaviour of Project emissions. This topic will be further addressed in the EAR/IS and the details of the assessment will be included in the human health study plan.</p>  | Section 17.1.2, Section 24.1.1                                 | Appendix C                                    |

| Item No. | Summary of Issue   | Proponent Response  | Cross-Reference to Section of the Detailed Project Description | Cross-Reference to Section of the Summary DPD |
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|          | <ul style="list-style-type: none"> <li>› effects on quality and quantity of drinking water; and</li> <li>› changes to country food quality caused by air, soil or water contaminants, including carcinogens, heavy metals (e.g., chromium, mercury) and other toxic substances released by project activities (e.g., aggregate sourcing, vehicle emissions), potential accidents and reasonably foreseeable projects in the area.</li> </ul> |   |  |   |
| 55       | Request for information on indicators related to baseline health conditions in the area, to assess the Project's potential effects to a range of health determinants, including socio-economic conditions and the potential impact to the health and well-being of Indigenous communities.   | <p>Many aspects of the environment are interconnected. As such, social determinants of health fall under multiple disciplines, including Aboriginal and Treaty Rights and Interests, Socio-economic, and Human Health. As per the approved Terms of Reference (ToR) for the Project (<a href="https://northernroadlink.ca/terms-2/">https://northernroadlink.ca/terms-2/</a>), the proponent is undertaking a comprehensive assessment of potential effects to the social determinants of health under these three disciplines.</p> <p>Preliminary baseline information on indicators related to baseline health conditions in the Project area is provided in Section 17.1.1 (Human Health Context - Preliminary Baseline Description), Section 17.2.1 (Socio-economic Context - Preliminary Baseline Description) and Section 17.4.1 (Aboriginal and Treaty Rights and Interests Context - Preliminary Baseline Description). Further information will be provided in the EA/IA.</p> <p>If it is determined that the Project is subject to a federal Impact Assessment under the <i>Impact Assessment Act</i>, the proponent's approach to the assessment of potential effects to human health will be refined based on the Project's Tailored Impact Assessment Guidelines (TISG) and the details of</p> | Section 17.1.1, Section 17.2.1, Section 17.4.1                 | N/A   |

| Item No. | Summary of Issue  | Proponent Response  | Cross-Reference to Section of the Detailed Project Description | Cross-Reference to Section of the Summary DPD |
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|          |   | the assessment will be presented in the applicable study plans. As outlined in Section 6.2 of the ToR, the proponent will seek input from Indigenous communities on the study plans.  |  |   |
| 56       | Concerns about the lack of information used in the problem formulation exercise of the Human Health Risk Assessment, including the identification of all potentially consumed country food species and human receptors. | The problem formulation step of the Human Health Risk Assessment (HHRA) has not been conducted yet. The proposed HHRA is further described in Section 17.1 (Human Health Context) and Section 24.1 (Human Health), and will be conducted during the EA/IA. Data that will be assessed in the HHRA problem formulation is currently being identified and collected. If it is deemed necessary to conduct a full HHRA (based on the outcomes of HHRA problem formulation), it is anticipated that all human receptor types would be assessed. IK engagement activities will strive to identify all potentially consumed country food items that are of concern/interest to local communities. Supplemental diet surveys within study area communities may also be conducted, if/as necessary, to identify the key country food items of concern/interest.   | Section 17.1,<br>Section 24.1                                  | N/A   |
| 57       | Request for information on the scenarios considered by the Proponent for potential accidents and malfunctions in the Human Health Risk Assessment, as well as on the proposed emergency responses.                      | Scenarios for potential accidents and malfunctions are not typically included in human health risk assessments (HHRA).<br>As indicated in Section 25.12 (Accidents and Malfunctions), the proponent will carry out an assessment of potential effects of accidents and malfunctions for the Project including failure of certain works or incidents involving road users caused by technological malfunctions, human error or exceptional natural events (e.g., flooding, earthquake, forest fire). As part of the assessment of accidents and malfunctions, the proponent will carry out a Hazard Identification and Risk Assessment of accidents and malfunctions across all phases of the Project, determine their potential effects, and present preliminary emergency response measures, systems, and associated response capacities. If it is determined that the Project is subject to a federal IA under the under the <i>Impact Assessment Act</i> , the proponent's approach to the assessment of potential effects of accidents and malfunctions will be refined based on the Project's Tailored Impact Assessment Guidelines (TISG) and the details of the assessment will be included in the EAR/IS. | Section 25.12  | Section 21                                    |

| Item No.   | Summary of Issue  | Proponent Response   | Cross-Reference to Section of the Detailed Project Description | Cross-Reference to Section of the Summary DPD |
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| 58   | Concerns that the Proponent has not considered an adaptive mitigation/management plan that would provide a timely response, if country food or water quality were impacted due to project activities and/or accidents.  | Potential effects to country food and water quality will be assessed in the EA/IA under the applicable VCs (e.g., human health, Aboriginal and Treaty Rights and Interests, surface water), including proposed mitigation measures. Follow-up strategies will be developed for Project-related effects, as appropriate, and will include adaptative management where applicable. As described in Section 27 (Follow-up and Monitoring) the proponent will prepare a monitoring framework for the Project which will initially be developed during the EA/IA. Preliminary proposed management plans are presented in Section 28 (Management Plans).   | Section 27, Section 28   | Section 25, Section 26                        |
| 59   | Request for information on the potential effects on human health and well-being and to social determinants of health from the influx of workers and the potential increase in cost of living and stress on available social services and health care, as well as from increased vehicular collisions. | Please see the response to Issue #55. In addition, the potential effects of vehicular collisions will be included in the assessment of potential effects of accidents and malfunctions. Please see the response to Issue #57 for further information about the assessment of accidents and malfunctions.   | N/A  | N/A   |
| <b>Social and Economic Conditions of Indigenous and Non-Indigenous Peoples</b> |   |  |  |   |
| 60   | Concerns about potential impacts to Indigenous peoples' economic conditions, including changes to the social assistance rate of Indigenous communities, which would no longer be considered remote after connecting to the provincial highway network through the Project.                            | The proponent acknowledges that there are concerns about potential impacts to Indigenous peoples' economic conditions, including changes to the social assistance rate of indigenous communities. This will be further assessed in the EA/IA.<br><br>The proponent made the following commitment (Commitment #63) during the provincial Terms of Reference (ToR) phase: "The proponent will engage with applicable provincial ministries and federal departments to determine how communities will be financially impacted by band support funding, social assistance rates and any other funding. The consultation and engagement program includes consultation with government agencies as well as Indigenous communities." Completion of this commitment will be tracked in the EAR/IS. | Section 17.2, Section 24.2                                     | Appendix C                                    |

| Item No. | Summary of Issue  | Proponent Response  | Cross-Reference to Section of the Detailed Project Description   | Cross-Reference to Section of the Summary DPD |
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| 61       | Concerns about the potential effects to species that are of socio-economic importance to Indigenous communities, including moose, caribou, beaver, muskrat, hare, ruffed grouse, spruce grouse, lake sturgeon, pickerel, whitefish, pike, burbot, geese, ducks, as well as vegetation and medicinal plants. | As described in Section 23.2 (Potential Effects) and Appendix G (Summary of Potential Effects and Preliminary Proposed Mitigation Measures), potential effects to Aboriginal and Treaty Rights and Interest, including potential effects to species that are important to Indigenous communities, will be considered and assessed during the EA/IA. As indicated in Section 17.4.2 (Proposed Baseline Studies), an IK Program will be conducted to collect IK/ILRU information for consideration and incorporation into the EA/IA and additional information on the potential effects to species that are important to Indigenous Communities will be included in the EAR/IS.<br><br>Many of these species will also be assessed under the Biological Environment assessment as indicated in Section 16.2 (Biological Environment), Section 21 (Fish and Fish Habitat, Aquatic Species and Migratory Birds), Section 25.8 (Wildlife and Wildlife Habitat), Section 25.9 (Birds and Bird Habitat), Section 25.10 (Plants and Vegetation Communities), and Section 25.11 (Species at Risk). | Section 16.2, Section 17.4.2, Section 23.2, Section 25.8, Section 25.9, Section 25.10, Section 25.11, Appendix G | Appendix C                                    |
| 62       | Comment regarding the spur roads, which may change the remoteness classification of Indigenous communities. This may improve conditions and decrease social issues by providing reliable and regular transportation to Indigenous communities.  | The proponent acknowledges that the Project may improve conditions and decrease some social issues by providing reliable and regular transportation to Indigenous communities. Section 24.2.1 (Potential Effects) presents preliminary potential effects of the Project on the Socio-economic Environment. Potential effects (positive and negative) will be assessed in the EA/IA.   | Section 24.2.1   | Appendix C                                    |

| Item No. | Summary of Issue  | Proponent Response   | Cross-Reference to Section of the Detailed Project Description  | Cross-Reference to Section of the Summary DPD |
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| 63       | Request for a cost-benefit analysis of Indigenous communities' costs associated with transportation and spoilage of goods due to the current winter road, and the potential for future saving opportunities that would be realized through the Project. | <p>The Project has the potential to increase employment and business opportunities in road construction and the mining sector, as well as facilitating the supply of and reducing the costs of goods and services.</p> <p>As indicated in Section 24.2.1 (Potential Effects) the assessment of the Regional and Local Economy will consider:</p> <ul style="list-style-type: none"> <li>› Changes in labour force participation and unemployment.</li> <li>› Changes to training and education programs.</li> <li>› Changes in income levels.</li> <li>› Changes in living costs including prices of goods.</li> <li>› Changes in municipal government revenues and costs.</li> </ul> <p>However, a cost-benefit analysis of Indigenous communities' costs associated with transportation and spoilage of goods due to the current winter road, and the potential for future saving opportunities, is not anticipated to be included in the EA/IA.</p> | Section 24.2.1  | Appendix C                                    |
| 64       | Request for further information on employment opportunities for members of Indigenous communities.  | <p>As described in Section 9.1 (Purpose of the Project), one of the project objectives is to provide employment and other economic opportunities to MFFN, WFN and local Indigenous community members. As described in Section 24.2.2 (Preliminary Proposed Mitigation), the Project will include education, training and hiring practices to encourage the employment of local workers, utilizing the Northern Ontario network of Indigenous Training Organizations such as the Indigenous Skills and Employment Training network.</p> <p>Further information on employment opportunities for members of Indigenous communities will be provided in the EAR/IS. It is too early in Project development to include this information in the Detailed Project Description.</p>  | Section 9.1,<br>Section 24.2.2                                  | Section 9.1,<br>Appendix C                    |
| 65       | Request for information on potential impacts to social conditions and social well-being (including on familial relationships), due to changes in quality of life, urbanization, increased connectivity, alteration                                      | <p>As described in Section 23.2 (Potential Effects - Aboriginal Treaty Rights and Interests) and 24.2 (Potential Effects - Socio-economic Environment) and Appendix G (Summary of Potential Effects and Preliminary Proposed Mitigation Measures), potential effects on socio-economic conditions, and cultural continuity and well-being, including due to changes in quality of life, urbanization, increased connectivity, alteration of social values, and increased mobility, will be considered and assessed during the EA/IA.</p>   | Section 17.4.2,<br>Section 23.2,<br>Section 24.2,<br>Appendix G | Appendix C                                    |

| Item No. | Summary of Issue  | Proponent Response  | Cross-Reference to Section of the Detailed Project Description | Cross-Reference to Section of the Summary DPD |
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|          | of social values and increased mobility.  | As indicated in Section 17.4.2 (Proposed Baseline Studies), an IK Program will be conducted to collect IK/ILRU information for consideration and incorporation into the EA/IA and additional information on the potential impacts to social conditions and social well-being will be included in the EAR/IS.  |  |   |
| 66       | Comments that the Proponent should engage with potentially impacted Indigenous communities to identify opportunities to enhance the positive effects of the Project, including training and employment opportunities, social assistance and wage subsidies. | <p>As described in Section 9.1 (Purpose of the Project), Project objectives include providing employment and other economic opportunities to MFFN, WFN and local Indigenous community members and enabling experience and training opportunities for youth.</p> <p>As described in Table 6-2 (Consultation Milestones), the proponent plans to consult with Indigenous communities and obtain input on the effects assessment.</p> <p>As described in Section 24.2.2 (Preliminary Proposed Mitigation), the proponent will encourage employment of local workers, utilizing the Northern Ontario network of Indigenous Training Organizations such as the Indigenous Skills and Employment Training network.</p> <p>The proponent will continue to engage with potentially impacted Indigenous communities to identify opportunities to enhance the positive effects of the Project, through the Consultation and Engagement and IK Programs.</p> | Table 6-2, Section 9.1, Section 24.2.2                         | Table 6-2, Section 9.1, Appendix C            |
| 67       | Request for information on the potential effects on social conditions, including community services and infrastructure, community safety, cultural continuity and well-being, because of potential increase in access to drugs.                             | <p>The Project is undergoing a provincial environmental assessment under the Ontario <i>Environmental Assessment Act</i>, and is expected to require an impact assessment under the federal <i>Impact Assessment Act</i>. As described in Section 24.2 (Socio-Economic Environment), potential effects related to changes in levels of substance use (e.g., drugs, alcohol) will be considered and assessed during the EA/IA.</p> <p>More baseline data and project design information is required before a detailed assessment of potential effects can be conducted. Additional information on the potential effects related to substance use will be provided in the EAR/IS.</p>   | Section 24.2   | Appendix C                                    |



| Item No. | Summary of Issue   | Proponent Response   | Cross-Reference to Section of the Detailed Project Description   | Cross-Reference to Section of the Summary DPD |
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| 68       | Request for information on profiles of Indigenous communities, including demographic characteristics, to allow for a greater understanding of the existing conditions.   | Table 17-1 (Community Profiles of Indigenous Communities Potentially Affected by or Interested in the Project) provides brief community profiles for Indigenous communities and organizations identified as potentially affected by or interested in the Project. Additional information on these Indigenous communities, including demographic characteristics will be included in the EA/IA.   | Table 17-1   | Table 17-1                                    |
| 69       | Concerns about potential economic impacts on local businesses (including tourism) due to project activities that would cause changes in scenic views, as well as potential economic disruptions to municipalities, local agencies, and provincial systems.   | As indicated in Section 16.1.7.2 (Proposed Baseline Studies - Visual Environment), tourism will be included in the detailed mapping dataset for the purpose of the Visual Environment Assessment.<br>As indicated in Section 25.5.1 (Potential Effects - Visual Environment), potential effects to the visual environment, changes in scenic views, will be considered and assessed during the EA/IA. Potential effects to tourism will also be considered in the Socio-economic assessment Section 17.2.1 (Preliminary Baseline Description - Socio-economic Context), Section 24.2.1 (Potential Effects - Socio-economic Environment).<br>Further details will be provided in the applicable study plans.  | Section 16.1.7.2, Section 17.2.1, Section 24.2.1, Section 25.5.1 | Appendix C                                    |
| 70       | Request for further information on the existing local and regional economy to assess the potential impacts of the Project, including: <ul style="list-style-type: none"> <li>› information on how workers would be hired locally, nationally or internationally;</li> <li>› the number and types of jobs the Project would create (direct, induced) during different project phases;</li> <li>› estimated salaries and compensation for those jobs in comparison to other provincial and local employers;</li> </ul> | As described in Section 9.1 (Purpose of the Project), one of the project objectives is to provide employment and other economic opportunities to MFFN, WFN and local Indigenous community members.<br>The project is undergoing a provincial environmental assessment under the Ontario <i>Environmental Assessment Act</i> , and is expected to require an impact assessment under the federal <i>Impact Assessment Act</i> . As described in Section 24.2.1 (Potential Effects - Socio-economic Environment), the socio-economic assessment will include: potential effects on labour force participation and unemployment; changes to training and education programs; and changes in income levels. As described in Section 24.2.2 (Preliminary Proposed Mitigation - Socio-economic Environment), the Project will include education, training and hiring practices to encourage the employment of local workers, utilizing the Northern Ontario network of Indigenous Training Organizations such as the Indigenous Skills and Employment Training network.<br>More baseline data and project design information is required before a detailed assessment of potential effects can be conducted. Further | Section 9.1, Section 24.2.1, Section 24.2.2                      | Section 9.1, Appendix C                       |

| Item No. | Summary of Issue   | Proponent Response   | Cross-Reference to Section of the Detailed Project Description             | Cross-Reference to Section of the Summary DPD      |
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|          | <ul style="list-style-type: none"> <li>› whether assistance would be provided during any temporary layoffs;</li> <li>› local employment barriers and availability of childcare for workers; and</li> <li>› any training and skills development programs to develop local job candidates.</li> </ul>  | <p>information on employment, training and related topics will be provided in the EAR/IS. It is too early in Project development to include this information in the Detailed Project Description.</p>  |  |  |
| 71       | <p>Request for information on the Proponent's efforts to recruit and train underrepresented groups in the labour market, including Indigenous peoples, youth, women and people with disabilities. Request for information on how these underrepresented groups would be supported to access equal economic benefits and opportunities, and information on mitigation measures that reflect intersectional principles and address barriers of marginalized persons.</p> | <p>As indicated in Section 26 (Effects Assessment Methods), the proponent will identify potential interactions with the Project in relation to underrepresented groups through GBA+ and potential mitigation measures to address impacts as part of the EA/IA. Consideration of GBA+ would be further described in the applicable study plans for the Project.</p> <p>Please see the response to Issue #70 for information on employment.</p>  | <p>Section 9.1,<br/>Section 24.2.1,<br/>Section 24.2.2,<br/>Section 26</p> | <p>Section 9.1,<br/>Appendix C,<br/>Section 24</p> |
| 72       | <p>Request that the Detailed Project Description clarify how the employment rate would be calculated. It is incorrect to compute the employment rate based on the participation rate.</p>  | <p>As indicated in Section 11 (Project Activities, Infrastructure, Permanent or Temporary Structures and Physical Works), the proponent will estimate approximate employment needs for the construction and operations of the Project during the preliminary engineering. This information will be included in the EAR/IS. The proponent will look for opportunities to boost local employment.</p> <p>The data presented in Section 17.2.1 (Preliminary Baseline Description) represents preliminary information about existing employment rates in the</p> | <p>Section 11,<br/>Section 17.2.1</p>                                      | <p>Section 11</p>                                  |

| Item No. | Summary of Issue  | Proponent Response   | Cross-Reference to Section of the Detailed Project Description | Cross-Reference to Section of the Summary DPD |
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|          |   | <p>region based on data from Statistics Canada (2017). The 'participation rate' mentioned in this section is the participation rate in Statistics Canada surveys.</p> <p><u>References:</u><br/>                     Statistics Canada. 2017. Census Profile, 2016 Census. Release date: February 8, 2017. Updated on: June 18, 2019. Available: <a href="https://www12.statcan.gc.ca/census-recensement/2016/dp-pd/prof/index.cfm?Lang=E%20()">https://www12.statcan.gc.ca/census-recensement/2016/dp-pd/prof/index.cfm?Lang=E%20()</a></p> |  |   |
| 73       | Request for clarification on who would be responsible for building, leading, and funding community social services and related support systems.   | Building, leading, and funding community social services and related support systems is not a component of the Project. However, as described in Section 24.2 (Socio-Economic Environment), the EA/IA will include an assessment of potential Project effects on the socio-economic environment and development of mitigation measures.  | Section 24.2   | Appendix C                                    |
| 74       | <p>Request for the Proponent to engage with the following local Indigenous Skills and Employment Training agreement holders for information on the local labour force and training opportunities:</p> <ul style="list-style-type: none"> <li>› Kiikenomaga Kikenjigewen Employment and Training Services</li> <li>› Wabun Tribal Council (MamoNuskomitowin)</li> <li>› Wikwemikong Unceded Indian Reserve.</li> <li>› Mamaweswen – The North Shore Tribal Council</li> <li>› Anishinabek Nation (Union of Ontario Indians)</li> </ul> | As described in Section 24.2.2 (Preliminary Proposed Mitigation), the proponent will encourage the employment of local workers, utilizing the Northern Ontario network of Indigenous Training Organizations such as the Indigenous Skills and Employment Training network. The proponent welcomes the information provided here on local Indigenous Skills and Employment Training resources for consideration during engagement.  | Section 24.2.2   | Appendix C                                    |

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|          | <ul style="list-style-type: none"> <li>› Aboriginal Labour Force Development Circle (First Nation)</li> <li>› Shooniyaa Wa-Biitong</li> <li>› Sioux Lookout Area Aboriginal Management Board</li> <li>› Mushkegowuk Council Employment &amp; Training Service</li> </ul> |  |  |   |
| 75       | Need for the Detailed Project Description to identify the locations of permanent and temporary residences and known sensitive receptors, including the location of drinking water sources and of waterbodies used for recreational purposes.                             | As described in Section 17.4.2 (Proposed Baseline Studies), an IK Program will be conducted to collect IK/ILRU information for consideration and incorporation into the EA/IA. Information will also be collected through the primary socio-economic data collection such as community surveys, interviews, and focus groups (Section 17.2.2 Proposed Baseline Studies - Socio-economic Context). This will include information on location of drinking water sources and of waterbodies used for recreational purposes. This information will be presented in the EAR/IS, however, the level of detail will be dependent on the confidentiality of the data.  | Section 17.2.2, Section 17.4.2                                 | N/A   |
| 76       | Need for detailed information on potential adverse effects from improper disposal of wastewater and waste, including garbage and debris generated by public road users, and a plan that describes how waste and wastewater would be managed.                             | <p>Table 11-2 (Summary of Project Activities by Phase) recognizes that Project activities include various emissions, discharges, and waste, including wastewater and litter. Potential effects related to these project activities are further described in Appendix G (Summary of Potential Effects and Preliminary Proposed Mitigation Measures) and will be further assessed in the EAR/IS.</p> <p>As indicated in Section 28 (Management Plans), the proponent will prepare management plans for the construction and operations phases of the Project, including:</p> <ul style="list-style-type: none"> <li>› Surface Water and Storm Water Management;</li> <li>› Waste Management (including Hazardous, Contaminated and Controlled Materials).</li> </ul> <p>Further detail on the Management Plans that will be prepared for the Project will be provided in the EAR/IS.</p> | Table 11-2, Section 28, Appendix G                             | Table 11-2, Section 26, Appendix C            |

| Item No.   | Summary of Issue   | Proponent Response  | Cross-Reference to Section of the Detailed Project Description | Cross-Reference to Section of the Summary DPD |
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| <b>Vulnerable Population Groups (Gender-Based Analysis Plus)</b> |  |   |  |   |
| 77   | Comments on the need to consider Gender-based Analysis Plus (GBA Plus) when collecting information on health, social and economic conditions.  | <p>As described in Section 17 (Description of the Health, Socio-economic, Cultural Heritage Resources, and Aboriginal and Treaty Rights and Interests Context), if an IA is required for the Project, the proponent intends to conduct a GBA+ analysis as part of the EA/IA, in alignment with the Project's TISG. Baseline information for applicable components of the environment would be disaggregated to the extent practical to support the analysis of disproportionate effects of the Project on vulnerable or underrepresented groups, including Indigenous people or other community relevant subgroups (e.g., women, youth, elders). Consideration of GBA+ would be further described in the applicable study plans for the Project.</p> <p>As indicated in Section 17.2.2 (Proposed Baseline Studies - Socio-economic Context), where sources provide disaggregated data based on subgroups (i.e., women, youth, Elders, others), this data will be used in the baseline to characterize the sub-groups and to support a gender-based analysis plus (GBA+) framework. Further, as indicated in Section 17.4.2 (Proposed Baseline Studies - Aboriginal Treaty Rights and Interests) the selection of participants for project-specific studies will consider the importance of selecting a diversity of participants (women, Elders, youth, gender diverse peoples and those with disabilities). Consideration of GBA+ will be further described in the applicable study plans for the Project.</p> | Section 17, Section 17.2.2, Section 17.4.2                     | N/A   |
| 78   | Request for health and safety indicators in relation to gender-based violence and a table of key issues and mitigation measures to address the issues from the basis of a GBA Plus implementation framework. | <p>As indicated in Section 17.2 (Socio-economic Context) and Section 24.2 (Socio-economic Environment), community safety will be assessed in the EA/IA and includes consideration of gender-based violence. Further information will be provided in the study plan.</p> <p>As indicated in Section 26 (Effects Assessment Methods), if an IA is required for the Project, the proponent intends to conduct a GBA+ analysis as part of the EA/IA, in alignment with the Project's TISG. The proponent would identify potential interactions with the Project in relation to underrepresented groups through GBA+ and mitigation measures to address impacts as part of the EA/IA. Consideration of GBA+ would be further described in the applicable study plans for the Project.</p>  | Sections 17.2, Section 24.2, Section 26                        | Section 24, Appendix C                        |

| Item No. | Summary of Issue  | Proponent Response  | Cross-Reference to Section of the Detailed Project Description | Cross-Reference to Section of the Summary DPD |
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| 79       | Concerns about the potential effects on Indigenous women's safety due to new roads and potential mining activity.   | <p>As indicated in Section 17.2 (Socio-economic Context) and Section 24.2 (Socio-economic Environment), community safety will be assessed in the EA/IA, including women's safety (e.g., changes in rates of domestic violence, sexual and physical assault).</p> <p>As indicated in Section 26 (Effects Assessment Methods), if an IA is required for the Project, the proponent intends to conduct a GBA+ analysis as part of the EA/IA, in alignment with the Project's TISG. The proponent would identify potential interactions with the Project in relation to underrepresented groups through GBA+ and potential mitigation measures to address impacts as part of the EA/IA. Consideration of GBA+ would be further described in the applicable study plans for the Project.</p>   | Sections 17.2, Section 24.2, Section 26                        | Section 24, Appendix C                        |
| 80       | Request for further clarity on the segments of the population that would benefit from the Project, including how the economic and social benefits brought to Marten Falls First Nation and Webequie First Nation would be distributed between youth, Elders, women, two-spirit people, and other marginalized identities. | <p>As described in Sections 17.2 (Socio-economic Context) and 24.3 (Socio-economic Environment), the EA/IA will assess the socio-economic effects of the Project. More detailed information on the Socio-economic assessment will be provided in the study plan.</p> <p>As indicated in Section 26 (Effects Assessment Methods), if an IA is required for the Project, the proponent intends to conduct a GBA+ analysis as part of the EA/IA, in alignment with the Project's TISG. The proponent would identify potential interactions with the Project in relation to underrepresented groups through GBA+ and potential mitigation measures to address impacts as part of the EA/IA. This includes consideration of how the economic and social benefits brought to Marten Falls First Nation and Webequie First Nation would be distributed between youth, Elders, women, two-spirit people, and other marginalized identities. Consideration of GBA+ would be further described in the applicable study plans for the Project.</p> | Section 17.2, Section 24.3, Section 26                         | Section 24, Appendix C                        |
| 81       | Concerns about potential effects from road infrastructure on social change, and impacts on diverse subgroups of people during all phases of the Project.  | <p>As described in Sections 17.2 (Socio-economic Context) and 24.3 (Socio-economic Environment), the EA/IA will assess the socio-economic effects of the Project. More detailed information on the Socio-economic assessment will be provided in the study plan.</p> <p>As indicated in Section 26 (Effects Assessment Methods), if an IA is required for the Project, the proponent intends to conduct a GBA+ analysis as part of the EA/IA, in alignment with the Project's TISG. The proponent would identify potential interactions with the Project in relation to underrepresented groups</p>   | Section 26   | Section 24                                    |

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|          |   | through GBA+ and potential mitigation measures to address impacts as part of the EA/IA. Consideration of GBA+ would be further described in the applicable study plans for the Project.   |  |   |
| 82       | <p>Request for the Proponent to clarify the number of people that were engaged from each Indigenous community and specify how intersectional identities and GBA Plus factors were included in their engagement.</p> <p>Request for a table of key issues and mitigation measures to address them from the basis of a GBA Plus implementation framework.</p> | <p>Section 4 (Consultation and Engagement with Indigenous Communities and Groups) and Appendix E (Additional Information on Consultation and Engagement with Indigenous Communities and Groups) provides information on engagement with Indigenous communities. Detailed information is provided in the Record of Consultation. Disaggregated GBA+ statistics are not available for consultation and engagement during the ToR stage.</p> <p>The proponent intends to conduct a GBA+ analysis as part of the EA/IA. The proponent expects that if a federal IA is required, the GBA+ requirements will be outlined in the TISG. At that time, the proponent would determine how GBA+ will be incorporated into the assessment.</p> <p>As indicated in Section 17 (Description of the Health, Socio-economic, Cultural Heritage Resources, and Aboriginal and Treaty Rights and Interests Context): "If an IA is required for the Project, the proponent intends to conduct a GBA+ analysis as part of the EA/IA, in alignment with the Project's TISG. Baseline information for applicable components of the environment would be disaggregated to the extent practical to support the analysis of disproportionate effects of the Project on vulnerable or underrepresented groups, including Indigenous people or other community relevant subgroups (e.g., women, youth, elders). Consideration of GBA+ would be further described in the applicable study plans for the Project."</p> <p>A summary table outlining impacts and mitigation measures will be included in the EAR/IS. This will include issues related to the GBA+ analysis.</p> | Section 4, Section 17, Appendix E                              | Section 4, Section 17                         |
| 83       | Request for the Proponent to consider education, childcare, and gender-based support systems (women's centers, shelters, and health and support services) in its description of the socio-economic environment.   | As described in Section 17 (Description of the Health, Socio-economic, Cultural Heritage Resources, and Aboriginal and Treaty Rights and Interests Context), if an IA is required for the Project, the proponent intends to conduct a GBA+ analysis as part of the EA/IA, in alignment with the Project's TISG. Baseline information for applicable components of the environment would be disaggregated to the extent practical to support the analysis of disproportionate effects of the Project on vulnerable or underrepresented groups, including Indigenous people or other community relevant subgroups   | Section 17   | Section 17                                    |

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|  |   | <p>(e.g., women, youth, elders). Consideration of GBA+ would be further described in the applicable study plans for the Project.</p> <p>The proponent will consider education, childcare, and gender-based support systems (women’s centers, shelters, and health and support services) in its description of the socio-economic environment to the extent that the information is available.</p>  |  |   |
| 84   | Request for a table of key issues and mitigation measures to address them from the basis of a GBA Plus implementation framework.  | Please see the response to Issue #82.  | Section 17   | Section 17                                    |
| 85   | Request that the Proponent assesses the potential impacts on underrepresented subgroups within other local Indigenous communities and public groups that would be impacted by the Project.  | As indicated in Section 26 (Effects Assessment Methods), the proponent will identify potential interactions with the Project in relation to underrepresented groups through GBA+ and potential mitigation measures to address impacts as part of the EA/IA. Consideration of GBA+ would be further described in the applicable study plans for the Project.  | Section 26   | Section 24                                    |
| <b>Atmospheric Environment (e.g., Air Quality)</b> |   |  |  |   |
| 86   | Concerns about the potential effects on air quality from point and fugitive emission sources during construction (e.g., land clearing, stockpiling, material handling, blasting, operating diesel generators) and operation, including maintenance (e.g., road use, fuel combustion, mobile off-road machines operating diesel generators and other machinery). | <p>The Project is undergoing a provincial environmental assessment under the Ontario <i>Environmental Assessment Act</i>, and is expected to require an impact assessment under the federal <i>Impact Assessment Act</i>. As described in Section 25.1 (Potential Effects - Air Quality), potential effects on air quality, including but not limited to those identified in this comment, will be considered and assessed during the EA/IA.</p> <p>More baseline data and project design information is required before a detailed assessment of potential effects can be conducted. Additional information on the potential effects on air quality will be included in the EAR/IS.</p> | Section 25.1   | Appendix C                                    |



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| 87       | Request for further information on the approach proposed for baseline data collection to assess impacts on air quality, including locations of the human receptors such as traditional land users, and a list of baseline air constituents that would be assessed (inclusive of compounds that would be generated from the Project). | <p>As indicated in Section 16.1.1.2 (Proposed Baseline Studies - Air Quality), baseline air quality data from the MFCAR ambient air quality monitoring program (including particulate matter (PM2.5), ozone, nitrogen oxides (NOx), sulphur dioxide (SO2), and BTEX (benzene, toluene, ethylbenzene, and xylene), will be used. As described in Section 26 (Effects Assessment Methods), study plans will be developed to provide more detail on specific VC assessments.</p> <p>As indicated in Section 25.1.1 (Potential Effects - Air Quality), receptor locations will be included in the effects assessment and will represent sensitive receptor types (i.e., areas where occupants may be more susceptible to adverse effects). Sensitive receptors include but are not limited to hospitals, schools, child-care facilities and senior housing). Input will be sought to select sensitive receptor locations through discussions with Indigenous communities, government agencies and other stakeholders.</p>   | Section 16.1.1.2, Section 25.1.1                               | Appendix C                                    |
| 88       | Request for benzo(a)pyrene [BaP] to be used as a surrogate to assess total polycyclic aromatic hydrocarbons (PAHs), instead of BTEX (benzene, toluene, ethylbenzene, and xylene).  | <p>As indicated in Section 16.1.1.2 (Proposed Baseline Studies), BaP and diesel particulate matter were not sampled in the MFFN monitoring program due to equipment limitations coupled with serviceability challenges presented with the location of the community. Background levels of polycyclic aromatic hydrocarbons (as BaP) will be obtained from monitoring programs and analysis conducted by CAREX Canada (CAREX, 2023). BTEX and particulate matter will be used as surrogates for diesel particulate matter. Concentrations of specific relevant contaminants such as acetaldehyde, formaldehyde, 1,3-butadiene, and acrolein will be estimated based on monitored BTEX concentrations and published emission factors, such as the US EPA AP-42 emissions database (US EPA, 2021). Further details will be provided in the study plan (Section 26 Effects Assessment Methods).</p> <p><u>References:</u><br/>           CAREX Canada (CAREX). 2023. PAHs Environmental Exposures. Retrieved from:<br/> <a href="https://www.carexcanada.ca/profile/polycyclic-aromatic-hydrocarbons-environmental-exposures/">https://www.carexcanada.ca/profile/polycyclic-aromatic-hydrocarbons-environmental-exposures/</a><br/>           United States Environmental Protection Agency (US EPA). 2021. AP-42 Emission Factor Database. Available: <a href="https://www.epa.gov/air-emissions-factors-and-quantification/ap-42-compilation-air-emissions-factors">https://www.epa.gov/air-emissions-factors-and-quantification/ap-42-compilation-air-emissions-factors</a></p> | Section 16.1.1.2, Section 26                                   | Section 24                                    |

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| <b>Acoustic Environment</b>          |   |  |  |   |
| 89                                   | Concerns about potential effects of increased noise levels on Indigenous peoples and local businesses, including tourism businesses.  | As indicated in Section 25.3.1 (Potential Effects), quantitative noise impact assessments will be undertaken for the preferred corridor for both the construction and operations phases.<br><br>The assessment will account for receptor locations (including Indigenous peoples and local businesses, including tourism businesses) within the zone of influence of the Project.  | Section 25.3.1   | Appendix C                                    |
| 90                                   | Request for information on places that could be affected by increased noise levels, including places frequented for tourism and local businesses, such as hunting and fishing sites, and trapping cabins.   | As indicated in Section 25.3.1 (Potential Effects), the places (i.e., receptors) that will be impacted by increased noise levels will be mapped and identified upon completion of the quantitative noise impact assessment for both construction and operation phases of the project.  | Section 25.3.1   | Appendix C                                    |
| 91                                   | Comments on the identification of human receptors, particularly those that are noise-sensitive, through engagement activities.  | Section 16.1.3.2 (Proposed Baseline Studies - Noise) describes the identification of noise-sensitive receptors/areas. Further information will be provided in the study plan.  | Section 16.1.3.2   | N/A   |
| <b>Surface Water and Groundwater</b> |   |  |  |   |
| 92                                   | Request for information on effects on surface water quality of wetlands (including peatlands), aquatic ecosystems, and the bottom of waterbodies and watercourses, due to dewatering, change in water temperature, contamination and vegetation clearing that leads to sedimentation and erosion. | Potential effects to fish and fish habitat, surface water and groundwater, including but not limited to those mentioned in this issue, will be assessed in the EA/IA, as discussed in the following sections:<br><ul style="list-style-type: none"> <li>› Section 21.1.1 (Potential Effects - Potential Changes to Fish and Fish Habitat Under the <i>Fisheries Act</i>) - Construction phase: Changes in fish and aquatic species (including SAR habitat) habitat due to water quality changes such as changes in temperature regime, flow regime, increased contaminants due to accidental releases, or changes to water quality as a result of erosion/sedimentation.</li> <li>› Section 25.4.1 (Potential Effects - Groundwater) - Construction phase: Potential construction effects include short-term dewatering during the construction of the foundations of the roads and structures (including bridges and culverts), the production of aggregates at the pits and</li> </ul> | Sections 21.1, Section 25.4.1, Section 25.5.1                  | Appendix C                                    |

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|          |  | <p>quarries, and the water taking/pumping of groundwater from water supply wells at the construction camps can cause temporary decrease in groundwater tables and reduction of baseflow contributions to nearby groundwater dependent features (i.e., wetlands, streams, springs, and water supply wells, if any), especially within the dewatering zone of influence.</p> <ul style="list-style-type: none"> <li>› Section 25.5.1 (Potential Effects - Surface Water) - Construction phase: Discharge from dewatering can potentially cause erosion and mobilization of sediment and thus reduction of the water quality of receiving waterbodies at the discharge point and along the downstream flow path, with elevated total suspended solids (TSS) or turbidity.</li> </ul> |  |   |
| 93       | Request that Table F-1 of the Detailed Project Description include impact to surface water in relation to acid rock drainage/metal leaching.   | This potential effect, and preliminary mitigation measures, have been added to Section 25.5.1 (Potential Effects - Surface Water), Section 25.5.2 (Preliminary Mitigation Measures - Surface Water), and Appendix G (Summary of Potential Effects and Preliminary Proposed Mitigation Measures).  | Section 25.5.1, Section 25.5.2, Appendix G                     | Appendix C                                    |
| 94       | Request for information on potential effects to surface water quality from de-icing substances, gas, oil, contaminants from blasting and stockpiling of soil and aggregates, and for detail on potential mitigation measures.    | The potential effects included in this issue will be assessed in the EA/IA under both the surface water, and geology terrain and soils effects assessments (Section 25.6 [Geology Terrain and Soils], Section 25.5 [Surface Water]). As described in Section 26 (Effects Assessment Methods), various study plans will be prepared to provide more detail on specific Valued Component assessments.   | Section 25.5, Section 25.6, Section 26                         | Section 24, Appendix C                        |
| 95       | Request for detail on the potential constituents and contaminants released by project activities (e.g., de-icing, stockpiling, blasting) that may affect surface water quality, and for detail on potential mitigation measures. | Please see the response to Issue #94. Specific constituents of concern related to these activities will be further assessed in the EAR/IS.  | Section 25.5, Section 25.6, Section 26                         | Section 24, Appendix C                        |

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| 96       | Request for the development of a management plan for surface water preservation (of quality, quantity and flow) during all project phases.   | As indicated in Table 28-1 (Summary of Preliminary Component Management Plans), the Surface Water and Storm Water Management Plan includes "Environmental monitoring for water quality and quantity, as needed to monitor for flow and sediment events during in-water works".  | Table 28-1   | Table 26-1                                    |
| 97       | Concerns about potential effects on waterbodies and watercourses, including physical characteristics (such as rapids).   | As indicated in Section 11.1 (Project Infrastructure and Temporary and Permanent Structures), the actual number of water crossings will not be known until a corridor is chosen as well as the road alignment within that corridor, and could range from approximately 21 to 49 individual watercourse crossings.<br><br>As indicated in Section 25.5 (Surface Water) and 21.1 (Potential Changes to Fish and Fish Habitat Under the Fisheries Act), the EA/IA will include an assessment of effects to surface water quality and quantity and fish and fish habitat. | Section 11, Section 21.1, Section 25.5                         | Section 11, Appendix C                        |
| 98       | Concerns about potential effects on surface water hydrology, including the timing and volume of natural water flows, and the installation of culverts and watercourse crossings.   | As indicated in Section 11 (Project Activities, Infrastructure, Permanent or Temporary Structures and Physical Works), culverts at waterbody crossings will be sized to accommodate a minimum 25-year return period design flow for structures with a total span less than or equal to 6.0 metres (m), and a minimum 50-year return period design flow for structures with a total span greater than 6.0 m.<br><br>As indicated in Section 25.5 (Surface Water), the EA/IA will include an assessment of effects to surface water quality and quantity.               | Section 11, Section 25.5                                       | Section 11, Appendix C                        |
| 99       | Comments on the importance of culverts to preserve water flow.   | Please see the response to Issue #98.   | Section 11, Section 25.5                                       | Section 11, Appendix C                        |
| 100      | Request for information on groundwater characterization, faults, fracture zones, and groundwater- surface interactions based on KBM Resources Group's desktop analysis <sup>2</sup> of conditions at the project site. Request that an appropriate | Section 16.1.4.2 (Proposed Baseline Studies) briefly describes the proposed groundwater studies. Additional information on groundwater modelling will be provided in the applicable study plan. As described in Section 26 (Effects Assessment Methods), various study plans will be prepared to provide more detail on specific Valued Component assessments. Section 16.1.4.1 (Preliminary Baseline Description) identifies the KBM Resources study as a source of information for the proposed study.  | Section 16.1.4.1, Section 16.1.4.2, Section 26                 | Section 24                                    |

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|  | <p>groundwater model be prepared, using the desktop analysis.</p> <p>--</p> <p><sup>2</sup> Cited from the Initial Project Description: KBM Resources Group (KBM). 2019. Marten Falls First Nation Industrial Supply Road Hydrogeology Baseline Study. Draft. Prepared for AECOM. December 13, 2019.</p> |   |  |   |
| <b>Navigation and Navigable Waters</b> |  |   |  |   |
| 101                                    | <p>Concerns about potential impacts on navigation caused by the Project, including activities that obstruct or restrict the access to navigable waterways (e.g., portage routes and access roads), in particular the Attawapiskat and the Albany rivers.</p>   | <p>The Project is undergoing a provincial environmental assessment under the Ontario <i>Environmental Assessment Act</i>, and is expected to require an impact assessment under the federal <i>Impact Assessment Act</i>. More baseline data and project design information is required before a detailed assessment of potential Projects effects can be conducted and mitigation measures can be developed.</p> <p>Table 11-2 (Summary of Project Activities by Phase) provides Project activities, including construction of water crossings. Potential effects related to these project activities are further described in Appendix G (Summary of Potential Effects and Preliminary Proposed Mitigation Measures) and will be further assessed in the EAR/IS.</p> <p>The proponent will adhere to requirements under the <i>Canada Navigable Waters Act</i> for major, minor and other works on unlisted waterways deemed to be navigable, as described in Table 20-3 (Federal Legislation, Permits and Other Authorizations).</p> | <p>Table 11-2, Table 20-3, Appendix G</p>                      | <p>Table 11-2, Table 20-3, Appendix C</p>     |
| 102                                    | <p>Request for information on existing navigable waters that could be impacted by the Project. Commented that the Proponent needs to identify all possible navigable waters in proximity to</p>  | <p>As described in Section 17.4.2 (Proposed Baseline Studies), an IK Program will be conducted to collect IK/Indigenous Land and Resource Use (ILRU) information and incorporate it throughout the EA/IA, including use of navigable waters.</p> <p>As indicated in Section 11.1 (Project Infrastructure and Temporary and Permanent Structures) structures and culverts will be sized to accommodate</p>   | <p>Section 11.1, Section 17.4.2</p>                            | <p>Section 11.1</p>                           |

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|   | the Project, including all waterbodies and watercourses that are obviously navigable or obviously not navigable (with supporting rationale) and which waterbodies and watercourses still require a determination of navigability. | navigation where required and/or where watercourses have sufficient flow to support navigation. This issue will be further assessed in the EAR/IS and in the preliminary design report.  |  |   |
| <b>Riparian Environments and Wetlands (e.g., Peatlands)</b> |   |  |  |   |
| 103   | Concerns about potential effects to riparian and wetland environments, including from the introduction of invasive species, parasites and diseases, due to year-round access to the region.                                       | <p>The Project is undergoing a provincial environmental assessment under the Ontario <i>Environmental Assessment Act</i>, and is expected to require an impact assessment under the federal <i>Impact Assessment Act</i>. As described in Section 25.10.1 (Potential Effects - Plants and Vegetation Communities), potential effects on land cover, including but not limited to those identified in this issue (riparian and wetland environments), will be considered and assessed during the EA/IA. Introduction of invasive species will be managed by a number of mitigation measures already identified in Section 25.10.2 (Preliminary Proposed Mitigation - Plants and Vegetation Communities) such as:</p> <ul style="list-style-type: none"> <li>› Minimize vegetation/habitat clearing as much as practical, especially in wetlands and riparian zones;</li> <li>› Limit temporary infrastructure, including vehicle and heavy equipment access routes;</li> <li>› Revegetate disturbed areas with native and/or non-invasive vegetation;</li> <li>› Designate locations for temporary stockpiling of vegetation and soils;</li> <li>› Develop protocol for equipment to arrive to site clean and free of debris.</li> </ul> <p>More baseline data and project design information is required before a detailed assessment of potential effects can be conducted. Additional information on the potential effects to both Plant and Vegetation Communities, as well as their importance to Indigenous communities will be included in the EAR/IS.</p> | Section 25.10.1, Section 25.10.2                               | Appendix C                                    |

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| 104      | Concerns about potential direct and indirect effects on wetlands, wetlands loss and wetland functions, which can be determined through a wetland functions assessment. | <p>As indicated in Section 25.10.1 (Potential Effects - Plants and Vegetation Communities), potential effects on Plants and Vegetation Communities, including wetlands, will be assessed in the EA/IA.</p> <p>As indicated in Section 16.2.4.2 (Proposed Baseline Studies - Plants and Vegetation Communities), wetland function will be assessed using an approach based on criteria derived from Wetland Ecological Functions Assessment: An Overview of Approaches (Hanson et al. 2008). Information to support the Wetland Functional Assessment was collected for each wetland sampled during the 2022 field season and will be collected during the 2023 field programs. The proponent will use the collected field data, as well as information derived from published sources to describe the functions of the various wetland types within the study areas according to categories of wetland function (hydrological, hydrogeological, ecological, and sociological). Given the large number of wetlands involved, functional assessments will not be conducted on discrete individual wetlands. Instead, general functional values will be applied to account for hydrologic and hydrogeologic functions, and to capture ecological functions. Study area wide models will be developed to capture the potential usage/presence by waterfowl, breeding birds, mammal, and wetland vegetation indicators for of each wetland polygon. Spatial analysis processes will be used to define aquatic habitat support functions.</p> <p><u>References:</u><br/>Hanson, A., L. Swanson, D. Ewing, G. Grabas, S. Meyer, L. Ross, M. Watmough, and J. Kirby. 2008. Wetland Ecological Functions Assessment: An Overview of Approaches. Canadian Wildlife Service Technical Report Series No. 497. Atlantic Region. 59 pp.</p> | Section 16.2.4.2, Section 25.10.1                              | Appendix C                                    |
| 105      | Request for buffer zones and other mitigation measures that avoid and/or minimize effects to sensitive areas, such as wetlands.  | Setbacks and Buffer zones are planned mitigation measures for areas requiring protection as per Section 25.5.2 (Preliminary Proposed Mitigation - Surface Water) and Section 25.10.2 (Preliminary Proposed Mitigation - Plants and Vegetation Communities). Mitigation measures will include establish setbacks around sensitive and/or protected species and habitat features. These will be further developed in the EAR/IS.  | Section 25.5.2 and 25.10.2                                     | Appendix C                                    |

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| 106      | Request for more information pertaining to building techniques that would prevent the road from causing water-flow barrier effects through peatlands. | <p>As indicated in Section 11 (Project Activities, Infrastructure, Permanent or Temporary Structures and Physical Works), the proponent acknowledges the importance of preserving the hydrology of the peatlands and will include design measures to minimize negative effects. Road construction on peatlands is complex from both an engineering and environmental perspective.</p> <p>Road construction techniques may include:</p> <ul style="list-style-type: none"> <li>› leaving peat material in situ (e.g., building the road overtop peat);</li> <li>› the use of a geotextiles to manage migration of fine materials;</li> <li>› use of blast rock or large size screened aggregate placed on top of the peat to minimize or eliminate impacts to groundwater flow; and</li> <li>› equalization culverts.</li> </ul> <p>This issue will be further assessed in the EAR/IS and in the preliminary design report.</p> | Section 11   | Section 11                                    |
| 107      | Concerns about potential effects on muskegs, wetlands and forests, including on their functions, water quantity and hydrology.                        | <p>The Project is undergoing a provincial environmental assessment under the Ontario <i>Environmental Assessment Act</i>, and is expected to require an impact assessment under the federal <i>Impact Assessment Act</i>. As described in Section 25.10.1 (Potential Effects - Plants and Vegetation Communities), potential effects on vegetation communities, including but not limited to those identified in this issue (muskegs, wetlands, and forests), will be considered and assessed during the EA/IA.</p> <p>More baseline data and project design information is required before a detailed assessment of potential effects can be conducted. Additional information on the potential effects to both Plant and Vegetation Communities, as well as their importance to Indigenous communities will be included in the EAR/IS.</p>   | Section 25.10.1  | Appendix C                                    |



| Item No.                                       | Summary of Issue   | Proponent Response  | Cross-Reference to Section of the Detailed Project Description        | Cross-Reference to Section of the Summary DPD |
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| <b>Geology, Topography, Soil and Sediments</b> |  |   |   |   |
| 108  | Concerns about using locally sourced gravel, eskers or other glacial deposits as construction material, and their potential adverse effects on waterbodies and watercourses due to naturally abundant metals (such as chromium) in materials and their potential release into northern lakes and rivers. | As described in Section 16.1.6.2 (Proposed Baseline Studies), the geotechnical program will include testing for acid rock drainage/metal leaching (ARD/ML). The potential for ARD/ML is also identified in Section 25.6.1 (Potential Effects), Section 25.6.2 (Preliminary Proposed Mitigation), and Table 30-1 (Project Waste, Discharges and Emissions).<br><br>Concerns regarding metal leaching from locally sourced aggregates will be further addressed through geochemical characterization of borrow source materials and the assessment of impacts on surface water resulting from metal leaching in the EAR/IS. | Section 16.1.6.2, Section 25.6.1, Section 25.6.2, Section, Table 30-1 | Table 28-1, Appendix C                        |
| 109  | Need for further information on the potential effects on permafrost, eskers, and other glacial deposits due to project activities, including the development of aggregate pits.  | As indicated in Section 25.6.1 (Potential Effects), potential effects on Geology, Terrain and Soils, included but not limited to those mentioned in this issue, will be assessed in the EA/IA.  | Section 25.6.1  | Appendix C                                    |

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| <b>Effect and Impact Assessment Methodology</b> |  |   |  |   |
| 110   | Request for the Proponent to incorporate the Federal Environmental Quality Guidelines in their review of surface water quality data. As well, request for additional information on the methodology proposed for sampling surface water. | As described in Section 16.1.5.2 (Proposed Baseline Studies), surface water quality will be reviewed against the best available water quality guidelines. In most cases sample results will be compared against provincial water quality objectives; however, the Canadian Council of Ministers of the Environment (CCME) Canadian Water Quality Guideline for the Protection of Aquatic Life may also be used when appropriate, specifically for suspended sediment and turbidity, and where CCME guidelines are based on newer available science. Additional information on the methodology for sampling surface water will be described in the study plan and in the EAR/IS. | Section 16.1.5.2   | N/A   |

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| 111      | <p>Request for further information on baseline data collection and approaches, including detail on:</p> <ul style="list-style-type: none"> <li>› flora and fauna, particularly birds, black bears, moose, species at risk, wetlands, as well as species of importance to eco-tourism;</li> <li>› how the absence of a species would be assessed (i.e., absence during baseline studies does not always mean that the species is not present);</li> <li>› survey design, effort and site selection, as well as analyses on sample bias and uncertainty, with descriptions and justifications for each factor;</li> <li>› seasonal and annual variations, distribution and habitat use; and</li> <li>› maps with overlays that reflect wildlife habitat, migration routes and seasonal changes.</li> </ul> | <p>Proposed baseline studies are discussed in Section 16.2.1.2 (Fish and Fish Habitat), Section 16.2.2.2 (Wildlife and Wildlife Habitat), Section 16.2.3.2 (Birds and Bird Habitat), Section 16.2.4.2 (Plants and Vegetation Communities), and Section 16.2.5.2 (Species at Risk).</p> <p>As described in Section 26 (Effects Assessment Methods), a study plan will be prepared for the biological environment to provide more detail on specific VC assessments.</p> <p>Additional information on the baseline environment, including data on the items identified in this issue will also be included in the EAR/IS.</p> | <p>Section 16.2.1.2, Section 16.2.2.2, Section 16.2.3.2, Section 16.2.4.2, Section 16.2.5.2, Section 26</p> | <p>Section 24</p>                             |
| 112      | <p>Request for information on the indicators and methods proposed to assess potential impacts on Indigenous peoples' physical and cultural heritage.</p>   | <p>Section 17 (Description of the Health, Socio-economic, Cultural Heritage Resources, and Aboriginal and Treaty Rights and Interests Context), Section 23 (Indigenous Physical and Cultural Heritage, Current Use of Lands and Resources for Traditional Purposes, and Archaeological Resources), and Section 26 (Effects Assessment Methods) provide information on the assessment of impacts on Indigenous people's physical and cultural heritage. Further information will be provided in the study plans.</p>   | <p>Section 17, Section 23, Section 26</p>   | <p>Section 17, Section 24, Appendix C</p>     |

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| 113      | <p>Comments that, in relation to increased industrial traffic along the proposed project route, the impact assessment process should assess:</p> <ul style="list-style-type: none"> <li>› changes to the following valued components: <ul style="list-style-type: none"> <li>– water and land;</li> <li>– remote, pristine and fragile environments;</li> <li>– species of importance to Indigenous communities, and their habitats;</li> <li>– the continued practice of traditional activities within the traditional territories of Indigenous communities; and</li> <li>– ability for Indigenous communities to steward the environment; and</li> </ul> </li> <li>› how the effects due to the changes would be mitigated and addressed.</li> </ul> | <p>As indicated in Part F (Potential Effects of the Project) and Appendix G (Summary of Potential Effects and Preliminary Proposed Mitigation Measures), the potential effects of anticipated roadway traffic from the Project, included but not limited to those mentioned in this issue, will be assessed within multiples components of the environment in the EAR/IS (e.g., Aboriginal and Treaty Rights and Interests, Air Quality, Wildlife and Wildlife Habitat, Noise, etc.).</p> | Part F, Appendix G   | Part F, Appendix C                            |

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| 114      | Need for information on how the potential impacts from industrial traffic, between the provincial highway and the mineral deposits in the Ring of Fire area, travelling through Indigenous communities and their traditional territories would be addressed.  | As indicated in Table 11-2 (Summary of Project Activities by Phase) the proponent recognizes traffic as a Project activity. As indicated in Part F (Potential Effects of the Project) and Appendix G (Summary of Potential Effects and Preliminary Proposed Mitigation Measures), the potential effects of anticipated roadway traffic from the Project will be assessed within multiples components of the environment in the EAR/IS (e.g., Aboriginal and Treaty Rights and Interests, Air Quality, Wildlife and Wildlife Habitat, Noise, etc.).   | Table 11-2, Part F, Appendix G   | Table 11-2, Part F, Appendix C                |
| 115      | Need for engagement with Indigenous communities to gather information on the species of economic and cultural importance, and to inform the baseline studies.   | As indicated in Section 4.3 (Plan for Future Consultation and Engagement), the proponent will collect and include input provided by Indigenous communities during multiple stages of the EA/IA through the Indigenous Knowledge and Consultation and Engagement Programs. This includes input on species of economic and cultural importance.  | Section 4.3  | Section 4.3                                   |
| 116      | Request for a description of how the cumulative effects assessment would be conducted.  | The EA/IA will include a cumulative effects assessment as described in Section 25.13 (Cumulative Effects).   | Section 25.13  | Section 22                                    |
| 117      | Concerns about the effectiveness of mitigation measures to address adverse effects to mammals including large game animals, as well as adverse effects from the release of contaminants in de-icing products, blasting and stockpiling of soils and aggregate, loss of flora and fauna (including fish, birds and species at risk, and their habitats), changes to water quality and quantity, and the introduction of invasive species, parasites and disease. | The Project is undergoing a provincial environmental assessment under the Ontario <i>Environmental Assessment Act</i> , and is expected to require an impact assessment under the federal <i>Impact Assessment Act</i> . As described in Section 21.1 (Potential Changes to Fish and Fish Habitat Under the <i>Fisheries Act</i> ), Section 21.3 (Potential Changes to Migratory Birds under the <i>Migratory Birds Convention Act, 1994</i> ), Section 25.8 (Wildlife and Wildlife Habitat), Section 25.9 (Birds and Bird Habitat), Section 25.10 (Plants and Vegetation Communities), and Section 25.11 (Species at Risk), potential effects and preliminary mitigation measures relating the environmental sensitivities identified in this issue are being developed as part of the EAR/IS. More baseline data and project design information is required before a detailed assessment of potential effects can be conducted. Once these potential effects are identified, tailored mitigation measures to reduce and/or eliminate these potential effects will be identified. This information will be presented in the EAR/IS. Additional mitigation will also be identified during detailed design stages of the project, which would occur after the EAR/IS submitted. | Section 21.1, Section 21.3, Section 25.8, Section 25.9, Section 25.10, Section 25.11 | Appendix C                                    |

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| 118      | Concerns about the effectiveness of mitigation measures that would avoid or reduce potential impacts to Indigenous communities  | As indicated in Section 27.2 (Monitoring) the EAR/IS will include a conceptual monitoring plan that will consider effects monitoring. Effects monitoring involves activities designed to verify the predictions of the effects assessment (e.g., water quality and effects on fish communities), and to verify the effectiveness of mitigation measure(s) to reduce potential impacts to Indigenous communities.   | Section 27.2   | Section 25.2                                  |
| 119      | Request for follow-up and monitoring programs built in collaboration with and led by Indigenous communities that include a funded regional environmental monitoring program and consider the particular environment in the Far North.   | As indicated in Section 4.3 (Plan for Future Consultation and Engagement), the proponent will collect and include input provided by Indigenous communities during multiple stages of the EA/IA through the Indigenous Knowledge and Consultation and Engagement Programs. This includes input into follow-up and monitoring programs.<br><br>As described in Section 27 (Follow-up and Monitoring) the proponent will prepare a monitoring framework for the Project which will initially be developed during the EA/IA. Monitoring programs will consider the particular environment in the Far North. Preliminary proposed management plans are presented in Section 28 (Management Plans).<br><br>Funding for the environmental monitoring programs will be discussed in the EAR/IS.  | Section 4.3,<br>Section 27,<br>Section 28  | Section 4.3,<br>Section 25,<br>Section 26     |
| 120      | Concerns about potential long-term effects on Indigenous communities living on and/or using the land. Request that the determination of significance of residual effects and potential adverse impacts follows best practices, and that the methodology is thoroughly outlined in order for potentially impacted Indigenous communities to understand how conclusions were reached. | As described in Section 23.1.1 (Potential Effects - Cultural Heritage Resources), Section 23.2.1 (Potential Effects - Aboriginal and Treaty Rights and Interests) and Appendix G (Summary of Potential Effects and Preliminary Proposed Mitigation Measures), potential effects to Indigenous communities will be considered and assessed in the EA/IA. The effects assessment will follow provincial and federal requirements and best practices. As described in Section 26 (Effects Assessment Methods), a study plan will be prepared for the Aboriginal and Treaty Rights and Interests assessment. Plain language fact sheets summarizing each study plan will be prepared and presented for input early in the EA/IA as part of the Consultation and Engagement Program.<br><br>As discussed on Section 17.4.2 (Proposed Baseline Studies), an Indigenous Knowledge (IK) Program will be conducted to collect IK/Indigenous Land and Resource Use (ILRU) information for consideration and incorporation into the EA/IA. An IK Guidance Document is being developed for the IK Program. | Section 17.4.2,<br>Section 23.1.1,<br>Section 23.2.1,<br>Section 26,<br>Appendix G | Section 24,<br>Appendix C                     |

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| <b>Cumulative Effects</b> |  |   |  |  |
| 121                       | Concerns about potential cumulative effects on the pristine natural environment and on the traditional territories of Indigenous communities, from industrial development (e.g., forestry, mineral exploration, mining activities) and the supportive infrastructure (e.g., power generation, power transmission) that would rely on the Project and the proposed road corridors to the Ring of Fire area. | The EA/IA will include a cumulative effects assessment as described in Section 25.13 (Cumulative Effects).  | Section 25.13  | Section 22   |
| 122                       | Concerns regarding potential cumulative effects on peatlands and their ability to sequester and store carbon.  | <p>The EA/IA will include a cumulative effects assessment as described in Section 25.13 (Cumulative Effects).</p> <p>The Project is undergoing a provincial environmental assessment under the Ontario <i>Environmental Assessment Act</i>, and is expected to require an impact assessment under the federal <i>Impact Assessment Act</i>. More baseline data and project design information is required before a detailed assessment of potential Projects effects can be conducted and mitigation measures can be developed. Carbon sinks are discussed in the following sections:</p> <ul style="list-style-type: none"> <li>› Section 29 (Greenhouse Gas Emissions Estimate) provides a preliminary conservative estimate of GHG emissions for the operations phase. A detailed estimate of GHG emissions for all Project phases, along with an assessment of changes in sources and carbon sinks from the clearing of vegetation and disturbance of peatlands/wetland, will be provided in the EAR/IS.</li> <li>› Section 8.2.1.1 (Initial and Detailed Project Description) provides the Project activities that may affect carbon sinks by Project phase. Potential effects to carbon sinks will be assessed in the EAR/IS under multiple components of the environment.</li> </ul> | Section 8.2, Section 8.2.1.1, Section 25.2.2, Section 25.4.2, Section 25.10.2, Section 25.13, Section 29 | Section 8.2, Section 8.2.1.1, Section 22, Section 27, Appendix C |

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|          |  | <ul style="list-style-type: none"> <li>› Section 25.5.1 (Potential Effects) provides information on the hydrological assessment that will be conducted during the EA/IA. Peatlands will be considered in the surface water, groundwater, plants and vegetation communities, geology, terrain and soils, and climate change assessments.</li> <li>› Preliminary mitigation measures related to loss of carbon sinks are presented in Section 25.2.2 (Preliminary Proposed Mitigation), Section 25.4.2 (Preliminary Proposed Mitigation), and Section 25.10.2 (Preliminary Proposed Mitigation). Further information on mitigation measures related to loss of carbon sinks will be provided in the EAR/IS. As described in Section 8.2 (Strategic Assessment of Climate Change) the proponent will conduct a strategic assessment of climate change for the Project following ECCC guidance.</li> </ul> |  |   |
| 123      | Concerns about potential cumulative effects on cultural, social, health and economic conditions.   | The EA/IA will include a cumulative effects assessment as described in Section 25.13 (Cumulative Effects).   | Section 25.13  | Section 22                                    |
| 124      | Concerns about potential cumulative impacts on Indigenous peoples, stemming from the Project and future developments, including impacts from traffic, increased public access (particularly access to traditional territories), downstream effects and climate change. | The EA/IA will include a cumulative effects assessment as described in Section 25.13 (Cumulative Effects). Further information will be presented in the cumulative effects assessment study plan as indicated in Section 26 (Effects Assessment Methods). Indigenous communities and regulators will be consulted on the cumulative effects assessment study plan.   | Section 25.13, Section 26                                      | Section 22, Section 24                        |



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| 125  | Need for information on measures to address potential cumulative changes to the exercise of rights protected under section 35 of the <i>Constitution Act, 1982</i> due to the Project, including due to industrial traffic, other projects that are reasonably foreseeable, as well as climate change. | <p>An assessment of cumulative effects will be completed for the EA/IA as indicated in Section 25.13 (Cumulative Effects). The cumulative effects assessment will identify the residual effects from the Project that have the potential for interaction (spatial and temporal) with the residual effects of past, present, or reasonably foreseeable projects. The results of the cumulative effects assessment will be presented in the EAR/IS.</p> <p>As indicated in Section 23.2 (Potential Effects) and Appendix G (Summary of Potential Effects and Preliminary Proposed Mitigation Measures), potential effects to Aboriginal and Treaty Rights and Interest will be considered and assessed in the EA/IA.</p> <p>As indicated in Section 17.4.2 (Proposed Baseline Studies), an IK Program will be conducted to collect IK/ILRU information for consideration and incorporation into the EA/IA, including information on potential effects to the exercise of rights protected under Section 35 of the <i>Constitution Act, 1992</i> due to the Project.</p> <p>As indicated in Section 8.2 (Strategic Assessment of Climate Change) the proponent will conduct a strategic assessment of climate change for the Project following ECCC guidance.</p> | Section 8.2, Section 17.4.2, Section 23.2, Section 25.13, Appendix G | Section 8.2, Section 22, Appendix C           |
| <b>Project Activities, Components and Design</b> |  |  |  |   |
| 126  | Comments about the lack of clarity about road ownership and the identity of the responsible party for proper operation, including maintenance, of the proposed road.   | As indicated in Section 2.1 (Proponent Name), MFFN and WFN together are the proponent of the EA/IA and preliminary design for the Project. Proponent options for road ownership, operation/maintenance activities and liability are being considered in ongoing discussions with the Province of Ontario. These discussions will evolve during the development of the EA/IA.   | Section 2.1  | Section 2                                     |
| 127  | Need for the Detailed Project Description to provide further information on the purpose of the Project, the construction, operation and the maintenance activities of an industrial road of this length.   | <p>As described in Section 9.1 (Purpose of the Project), the purpose of the Project is the design, construction, and operation and maintenance of a proposed all-season road between the proposed MFCAR and the proposed WSR.</p> <p>As described in Section 11 (Project Activities, Infrastructure, Permanent or Temporary Structures and Physical Works) the DPD provides a general description of the Project activities, infrastructure, permanent or temporary</p>  | Section 9.1, Section 11  | Section 9.1, Section 11                       |

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|          |  | <p>structures and physical works. This description is based on conceptual design and is subject to change. The EAR/IS will include a more detailed description of the proposed Project based on the preliminary engineering design for the preferred alternative, including construction, operation and the maintenance activities.</p>  |  |   |
| 128      | <p>Need for the Detailed Project Description to provide additional information on the proposed project components, including the specific locations of aggregate pits, access roads and watercourse crossings.</p>                               | <p>As described in Section 11 (Project Activities, Infrastructure, Permanent or Temporary Structures and Physical Works) the DPD provides a general description of the Project activities, infrastructure, permanent or temporary structures and physical works. This description is based on conceptual design and is subject to change.</p> <p>It is too early in Project design to determine the specific locations of aggregate pits, access roads and watercourse crossings. As indicated in Section 14.1 ("Alternative Means" to Carry Out the Project), the EA/IA will include an assessment of alternative means of carrying out the Project. The proponent will consider the following alternative means of carrying out the Project:</p> <ul style="list-style-type: none"> <li>› Corridor alternatives, for evaluation and selection of a preferred corridor for the Project.</li> <li>› Ancillary infrastructure alternatives for the preferred corridor (e.g., aggregate sites, water crossings, access roads, lay down areas, other associated infrastructure).</li> </ul> <p>The location of aggregate pits, access roads and watercourse crossings cannot be determined until a preferred corridor has been selected. This information will be included in the EAR/IS.</p> | Section 11, Section 14   | Section 11, Section 14                        |
| 129      | <p>Request for further clarity on the potential maximum volume of traffic on the road, expected primary users of the road, and future scenarios of mining, forestry, and hydroelectric projects for the alternative road corridors proposed.</p> | <p>As indicated in Section 12 (Estimated Maximum Project Capacity), for the purposes of developing the preliminary design criteria for the Project, it is assumed the Annual Average Daily Traffic (AADT) volume will exceed 500 vehicles per day; however, this will be further evaluated in the EA/IA.</p> <p>The Project is currently undergoing preliminary engineering design, and a more detailed characterization of the nature and volume of anticipated road traffic is being developed to support the design.</p> <p>With respect to future scenarios related to other developments such as</p>  | Section 12, Section 25.13                                      | Section 12, Section 22                        |

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|          |  | mining, forestry, and hydroelectric projects, the EAR/IS will include a cumulative effects assessment as described in Section 25.13 (Cumulative Effects). The cumulative effects assessment will identify the residual effects from the Project that have the potential for interaction (spatial and temporal) with the residual effects of past, present, or reasonably foreseeable projects.   |  |   |
| 130      | Request for transparent information on funding, permitting, and approvals, from government, private sector businesses, and the mineral development industries that support the Project.                              | As indicated in Section 2.1 (Proponent Name), funding for the costs of the EA/IA for this Project is being provided by the Province of Ontario. Information on funding, permitting, and approvals, from government, private sector businesses, and the mineral development industries that support the Project will be provided in the EAR/IS to the extent that this information is available and known.  | Section 2.1  | Section 2                                     |
| 131      | Request that the Detailed Project Description references the responsibilities of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and the Kunming-Montreal Global Biodiversity Framework. | <p>The proponent understands that the responsibilities of the UNDRIP and the Kunming-Montreal Global Biodiversity Framework lie with the signatories of these agreements, not with the proponent. However, while conducting the EA/IA the proponent will meet the requirements under the <i>Impact Assessment Act</i>, in alignment with the following sections:</p> <ul style="list-style-type: none"> <li>› Section 6(2) The Government of Canada, the Minister, the Agency and federal authorities, in the administration of this Act, must exercise their powers in a manner that fosters sustainability, respects the Government’s commitments with respect to the rights of the Indigenous peoples of Canada and applies the precautionary principle.</li> <li>› Section 22 (1)(i) the extent to which the effects of the designated project hinder or contribute to the Government of Canada’s ability to meet its environmental obligations and its commitments in respect of climate change.</li> </ul> | N/A  | N/A   |
| 132      | Comments about the need for further information on the proposed mitigation measures and the implementation of policies during the operation phase to enforce safe speed limits. Clarify who would be                 | As described in Section 12 (Estimated Maximum Project Capacity), the design speed for the Project is 100 km/h, with an anticipated posted speed limit of 80 km/h. Proposed mitigation measures, implementation of policies during the operation phase to enforce safe speed limits, and enforcement will be discussed in the EAR/IS.   | Section 12   | Section 12                                    |

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|                             | responsible for enforcing these speed limits (i.e., the Proponent or the Ontario Provincial Police).  |  |  |   |
| <b>Need for the Project</b> |   |  |  |   |
| 133                         | Comments indicating that the Project would provide access to economic and social opportunities for local Indigenous communities and industry stakeholders, connecting Indigenous communities to the provincial highway network.   | The proponent acknowledges the potential positive effects of the Project of providing access to economic and social opportunities for local Indigenous communities and industry stakeholders by connecting Indigenous communities to the provincial highway network. Potential benefits of the Project are discussed in Section 9.2 (Need for the Project) and will be further discussed in the EAR/IS.  | Section 9.2  | Section 9.2                                   |
| 134                         | Comment stating the Project would allow future mining developments that are critical to support de-carbonization efforts and net zero emission targets.   | The proponent acknowledges the potential positive effect that the Project may allow future mining developments that are critical to support de-carbonization efforts and net zero emission targets. This potential positive effect will be further discussed in the EAR/IS under applicable disciplines.   | N/A  | N/A   |
| 135                         | Concerns about the scope of the Project not reflecting broader societal perspectives from Indigenous communities and grassroots organizations.  | As indicated in Section 4.3 (Plan for Future Consultation and Engagement), through the Consultation and Engagement Plan and the Indigenous Knowledge Program, the proponent aims to collaborate with Indigenous communities in characterizing baseline conditions, predicting potential project impacts, and determining appropriate mitigation and monitoring methods. This includes collecting broader societal perspectives from Indigenous communities and grassroots organizations to inform the EA/IA. | Section 4.3  | Section 4.3                                   |
| 136                         | Request that the Detailed Project Description further clarifies the scope of the Project with respect to its purpose(s), alternative means considered, and the weight of negative effects versus positive effects, considering the context of the proposed Webequie Supply Road and the | As described in Section 9.1 (Purpose of the Project), the purpose of the Project is the design, construction, and operation and maintenance of a proposed all-season road between the proposed MFCAR and the proposed WSR.<br><br>As indicated in Section 14.1 ("Alternative Means" to Carry Out the Project), the EA/IA will include an assessment of alternative means of carrying out the Project. The proponent will consider the following alternative means of carrying out the Project:               | Section 9.1, Section 14.1, Section 25.13                       | Section 9.1, Section 14.1, Section 22         |

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|  | Marten Falls Community Access Road projects, the potential upgrades to the Anaconda and Painter Lake forestry roads and the connection to the mineral deposits in the Ring of Fire area.   | <ul style="list-style-type: none"> <li>› Corridor alternatives, for evaluation and selection of a preferred corridor for the Project.</li> <li>› Ancillary infrastructure alternatives for the preferred corridor (e.g., aggregate sites, water crossings, access roads, lay down areas, other associated infrastructure).</li> </ul> <p>As described in Section 25.13 (Cumulative Effects), the EA/IA will include a cumulative effects assessment. The cumulative effects assessment will identify the residual effects from the Project that have the potential for interaction (spatial and temporal) with the residual effects of past, present, or reasonably foreseeable projects such as the proposed MFCAR, the proposed WSR, the potential upgrades to the Anaconda and Painter Lake forestry roads, and the connection to the mineral deposits in the Ring of Fire area.</p>  |  |   |
| <b>Alternative Means of Carrying Out the Project</b> |  |  |  |   |
| 137  | Need for further information in the Detailed Project Description regarding the alternative means to carry out the Project that would minimize effects to important wildlife areas, such as higher ground, eskers, travel routes, and spawning, denning, feeding and nesting sites. | <p>Thank you for providing these considerations for the assessment of alternative means of carrying out the Project: minimize effects to important wildlife areas, such as higher ground, eskers, travel routes, and spawning, denning, feeding and nesting sites. The proponent will use it to inform the assessment.</p> <p>As indicated in Section 14.1 ("Alternative Means" to Carry Out the Project), the EA/IA will include an assessment of alternative means of carrying out the Project. The proponent will consider the following alternative means of carrying out the Project:</p> <ul style="list-style-type: none"> <li>› Corridor alternatives, for evaluation and selection of a preferred corridor for the Project.</li> <li>› Ancillary infrastructure alternatives for the preferred corridor (e.g., aggregate sites, water crossings, access roads, lay down areas, other associated infrastructure).</li> </ul> <p>The proponent has developed preliminary criteria to assess alternative means of carrying out the Project. These preliminary criteria are presented in Section 2.2.3 of the approved Terms of Reference (<a href="https://northernroadlink.ca/terms-2/">https://northernroadlink.ca/terms-2/</a>). The assessment of alternative means to carry out the Project will incorporate input from Indigenous communities, the public, stakeholders, and federal and provincial regulators, to be obtained through the consultation and engagement process, as well as IK/ILRU and</p> | Section 14.1   | Section 14.1                                  |

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|   |  | <p>other baseline data. The proponent is currently reviewing feedback received during the review period for the Proposed ToR to update the criteria. Further consultation and engagement activities will be conducted to refine and finalize the criteria, the timing of which is still being determined.</p>  |  |   |
| <b>Alternatives to the Project</b>            |  |  |  |   |
| 138   | <p>Need for information on the alternatives to the Project that the Proponent considered.</p>  | <p>As described in Section 9.1 (Purpose of the Project), the purpose of the Project is the design, construction, and operation and maintenance of a proposed all-season road between the proposed MFCAR and the proposed WSR.</p> <p>As indicated in Section 14.2 (“Alternatives to” the Project), there are no “alternatives to” the Project that meet the need and/or achieve the purpose of the Project. As such, the only “alternative to” the Project that will be included in the EA/IA for assessment is “do nothing”. The EA/IA will include an assessment and evaluation of the advantages and disadvantages of proceeding with the undertaking (i.e., the Project) against the “do nothing” or null alternative.”</p>  | <p>Section 9.1,<br/>Section 14.2</p>                           | <p>Section 9.1,<br/>Section 14.2</p>          |
| 139   | <p>Comment that the Proponent should include information on rail as a potential means of transportation to the Ring of Fire area.</p>  | <p>Please see the response to Issue #138. The proposed NRL Project would connect to the proposed Marten Falls First Nation Community Access Road to the south, hence rail is not being considered.</p>   | <p>Section 9.1</p>   | <p>Section 9.1</p>                            |
| <b>Project Contribution to Sustainability</b> |  |  |  |   |
| 140   | <p>Request for information on how the Project’s contribution to sustainability would be determined, recognizing the interconnectedness and interdependence of human-ecological systems and the well-being of present and future generations.</p> | <p>As indicated in Section 25.14 (Project’s Contribution to Sustainability), the EA/IA will assess the Project’s contribution to sustainability, in recognition of the interconnectedness and interdependence of human-ecological systems and well-being of present and future generations. The effects assessment will include mitigation measures that are feasible and that may be needed to avoid or minimize potential adverse effects on sustainability of human-ecological systems and well-being of present and future generations.</p> <p>If it is determined that the Project is subject to a federal Impact Assessment under the <i>Impact Assessment Act</i>, the proponent’s approach to the assessment of the Project’s contribution to sustainability will be refined in alignment with the Project’s TISG and the details of the assessment will be presented in the EAR/IS.</p> | <p>Section 25.14</p>   | <p>Section 23</p>                             |

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| <b>Accidents and Malfunctions</b> |   |   |  |   |
| 141                               | Request for information on potential effects from accidents and malfunctions and the measures to prepare for, and prevent them, particularly unintentional releases of hazardous materials (e.g., fuel) from vehicles and machinery, during all project phases. | As indicated in Section 25.12 (Accidents and Malfunctions), the proponent will carry out an assessment of potential effects of accidents and malfunctions for the Project including failure of certain works or incidents involving road users caused by technological malfunctions, human error or exceptional natural events (e.g., flooding, earthquake, forest fire). As part of the assessment of accidents and malfunctions, the proponent will carry out a Hazard Identification and Risk Assessment of accidents and malfunctions across all phases of the Project, determine their potential effects, and present preliminary emergency response measures, systems, and associated response capacities. If it is determined that the Project is subject to a federal IA under the <i>Impact Assessment Act</i> , the proponent's approach to the assessment of potential effects of accidents and malfunctions will be refined based on the Project's Tailored Impact Assessment Guidelines (TISG) and the details of the assessment will be included in the EAR/IS. | Section 25.12  | Section 21                                    |
| 142                               | Request for information on emergency response plans and procedures to respond to any accidents or malfunctions, including fuel or chemical spills.  | As indicated in Section 28 (Management Plans), the proponent will prepare management plans for the construction and operations phases of the Project. The applicable management plans will be prepared prior to the start of each Project phase and will incorporate feedback from consultation and engagement with federal and provincial government agencies, stakeholders, Indigenous communities and the public during the development of the EA/IA as appropriate and applicable. A preliminary list of proposed management plans is provided in Section 28 (Management Plans) and includes Emergency Response Management and Spill Prevention and Response Management.  | Section 28   | Section 26                                    |
| <b>Assessment Type</b>            |   |   |  |   |
| 143                               | Comments on the need for support for a co-led regional assessment to assess the effects of future mineral development and supportive infrastructure in the Ring of Fire area, cumulative effects, effects on freshwater,  | As indicated in Appendix D (Summary of Key Issues Raised during the Terms of Reference Stage of the Provincial Environmental Assessment Process) the completion of the Regional Assessment in the Ring of Fire Area is not a requirement for the proponent to proceed with the EA/IA for the Project. The proponent has entered into a Voluntary Agreement with the Ontario Minister of the Environment, Conservation and Parks (MECP, MFFN and WFN, 2020) under which the two First Nations have agreed to undertake   | Appendix D   | Appendix A                                    |

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|          | <p>impacts on the exercise of Aboriginal and Treaty rights, and climate change, with a preference for the regional assessment to be completed prior to the individual road project assessments. Comments indicating that studies conducted for the regional assessment would also be applicable to the Project and potential effects of the proposed Ring of Fire road corridors should be included in the regional assessment.</p> | <p>an Individual EA for the Project under the Ontario <i>Environmental Assessment Act</i>, which is the most comprehensive form of EA in Ontario. The decision to proceed with the provincial EA process for the Project is consistent with the agreement between the proponent and the Province of Ontario to proceed with the Project in accordance with provincial EA legislation, which entails completing the process in a timely manner. The proponent has also committed to realizing the Project’s intended/perceived benefits for their respective communities, and the region as a whole, within a reasonable timeframe. Deferring/pausing the Project’s EA does not align with these objectives. In addition, the federal Minister of Environment and Climate Change has indicated in recent correspondence with the proponent that impact assessments of the proposed road projects, and those of future projects will proceed in accordance with their legislative timelines, and separately from the regional assessment timeline.</p> <p><u>References:</u><br/>Minister of the Environment, Conservation and Parks, Marten Falls First Nation and Webequie First Nation (MECP, MFFN and WFN). 2020. Voluntary Agreement. Signed on October 28, 2020. Available: <a href="https://www.ontario.ca/page/northern-road-link-project#section-4">https://www.ontario.ca/page/northern-road-link-project#section-4</a></p> |  |   |
| 144      | <p>Concerns about the level of involvement and participation of Indigenous communities to determine positive and negative effects in the region, including downstream effects.</p>  | <p>As indicated in Section 6.2 (Objectives), the proponent is committed to conducting a comprehensive and meaningful consultation and engagement process for the Project.</p> <p>As shown in Table 6-2 (Consultation Milestones) the proponent plans to consult Indigenous communities for each EA/IA milestone, including the preliminary effects assessment and the cumulative effects assessment. These milestones would provide the opportunity for Indigenous communities to give feedback on positive and negative effects in the region, including downstream effects. A preliminary consultation schedule is provided in Table 6-3 (Proposed EA/IA Consultation and Engagement Schedule).</p> <p>As indicated in Section 17.4.2 (Proposed Baseline Studies), an IK Program will be conducted to collect IK/ILRU information for consideration and incorporation into the EA/IA. IK/ILRU data will be collected throughout the EA/IAs and will be incorporated directly into a number of aspects of the EA/IA</p>  | <p>Section 6.2, Table 6-2, Table 6-3, Section 17.4.2</p>       | <p>Section 6.2, Table 6-2, Table 6-3</p>      |



| Item No. | Summary of Issue  | Proponent Response  | Cross-Reference to Section of the Detailed Project Description | Cross-Reference to Section of the Summary DPD |
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|          |   | <p>database and assessment, including:</p> <ul style="list-style-type: none"> <li>› Establishment of existing conditions of the study areas as the baseline;</li> <li>› Input into the identification and evaluation of alternative road corridors;</li> <li>› Identification of Project interactions and potential effects, including potential impacts to community Aboriginal Treaty Rights and Interests (ATRI);</li> <li>› Identification of effective and established mitigation measures to reduce potential effects to ATRI;</li> <li>› Identification of potential methods to accommodate for potential impacts to ATRI that cannot be mitigated;</li> <li>› Identification of residual effects (i.e., net effects) after applying mitigation measures and accommodation;</li> <li>› Assessment of cumulative effects to ATRI; and</li> <li>› Follow-up commitments and monitoring programs for the assessment.</li> </ul>   |  |   |
| 145      | <p>Concerns about separate assessments for each road segment diminishing the effectiveness of efforts to fully account for the potential regional, cultural and socio-economic impacts of the Project, and contributing to consultation and engagement challenges and burdens on Indigenous communities following their traditional decision-making procedures.</p> | <p>As indicated in Appendix D (Summary of Key Issues Raised during the Terms of Reference Stage of the Provincial Environmental Assessment Process), the Ontario EA process is proponent-led. The proponents for each of the three proposed all-season road projects (MFCAR [MFFN], WSR [WFN], and NRL [MFFN and WFN], collectively the “proponent”) separately requested to enter into agreements with the Minister of the Environment, Conservation and Parks under the Ontario <i>Environmental Assessment Act</i> to make their respective projects subject to the requirements of the Ontario <i>Environmental Assessment Act</i>, because the purpose of each of the three projects is different. As a result of those agreements, each of the three proposed road projects are undergoing Individual EAs, which is the most comprehensive form of EA in Ontario.</p> <p>The three proposed all-season road projects are distinct and unique, with different purposes designed to meet the specific objectives of their respective proponents.</p> <p>The three proposed road projects are proceeding through their respective environmental assessment/impact assessment processes as three separate projects because they have different proponents and different purposes.</p> | Appendix D   | Appendix A                                    |

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|          |  | <p>There is no intentional project-splitting in taking this approach.</p> <p>The proposed MFCAR is an all-season community access road whose purpose is to provide access from the community to the provincial highway system near Nakina via the Anaconda-Painter Lake Road. The proponent is Marten Falls First Nation. Marten Falls First Nation has been studying the potential for an all-season community access road for more than a decade.</p> <p>The proposed WSR is an all-season road project between the community of Webequie and the proposed mine site. Its purpose is an economic development opportunity for the community to serve mineral exploration and future mining activities from its community. The proponent is Webequie First Nation.</p> <p>The proposed NRL is an all-season road project between the MFCAR and the WSR to connect the mineral deposits in the McFaulds Lake area in the Ring of Fire to the highway network via the MFCAR. The proponents are Marten Falls and Webequie First Nation.</p> <p>The proposed MFCAR created the opportunity for the NRL, and the NRL in turn, has created an opportunity for Webequie First Nation to connect to the provincial highway via the NRL and MFCAR.</p> <p>It should be noted, that while the three projects are proceeding separately through the EA/IA process, all three projects will be considered in the cumulative effects assessment for the NRL. This will provide for the consideration of the impacts of all three projects. A study plan will be developed for the cumulative effects assessment, and there will be an opportunity to provide input into the study plan.</p> |  |   |
| 146      | <p>Comments about the need to conduct a First Nation community review panel, in addition to an impact assessment, before development begins.</p> | <p>Establishing a First Nation community review panel is beyond the scope of the EA/IA.</p> <p>However, through the Consultation and Engagement Plan and the Indigenous Knowledge Program, the proponent aims to collaborate with Indigenous communities to identify any structure, site or things of historical, archaeological, paleontological, or architectural significance in consultation with Indigenous communities. The response should refer to how the proponent plans to collaborate with Indigenous communities to incorporate and assess their concerns to the EA/IA as applicable.</p>  | N/A  | N/A   |

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| <b>Other – Editorial Errors in the Initial Project Description</b> |  |   |  |  |
| 147  | <p>Request that the following editorial changes are reflected in the Detailed Project Description:</p> <ol style="list-style-type: none"> <li>1. Resolve the inconsistencies with the messaging for the Project's purpose.</li> <li>2. Replace Ministry of Tourism, Culture and Sport (MTCS) with Ministry of Citizenship and Multiculturalism (MCM) when used in the context of the Ontario Government's cultural heritage programs, documents and functions.</li> <li>3. Replace "cultural landscape" with "cultural heritage landscape" when referring to the context of cultural heritage resources. Cultural landscape is not a defined term in the Cultural Heritage Conservation Policy and may be misleading.</li> <li>4. Update Table 15-2 to indicate 'Woodland Caribou' instead of Boreal population. Eastern Migratory Caribou and Boreal Caribou cannot be differentiated by observation, and it is possible Eastern Migratory Caribou could be in the</li> </ol> | <ol style="list-style-type: none"> <li>1. As described in Section 9.1 (Purpose of the Project), the purpose of the Project is the design, construction, and operation and maintenance of a proposed all-season road between the proposed Marten Falls Community Access Road (MFCAR) and the proposed Webequie Supply Road (WSR). As indicated in Appendix D (Summary of Key Issues Raised during the Terms of Reference Stage of the Provincial Environmental Assessment Process): <ul style="list-style-type: none"> <li>› The Ontario EA process is proponent-led. The proponents for each of the three proposed all-season road projects (MFCAR [MFFN], WSR [WFN], and NRL [MFFN and WFN, collectively the "proponent"]) separately requested to enter into agreements with the Minister of the Environment, Conservation and Parks under the Ontario <i>Environmental Assessment Act</i> to make their respective projects subject to the requirements of the Ontario <i>Environmental Assessment Act</i>, because the purpose of each of the three projects is different.</li> <li>› As a result of those agreements, each of the three proposed road projects are undergoing Individual EAs, which is the most comprehensive form of EA in Ontario. Separating large projects into smaller ones (i.e., project splitting) has been attempted in the past by some proponents to: i) avoid regulatory thresholds like the federal Impact Assessment or, ii) have the ability to understate project impacts. The proponent is not doing either. The proponents chose to undertake separate projects because their purpose is different.</li> <li>› The three proposed all-season road projects are distinct and unique, with different purposes designed to meet the specific objectives of their respective proponents. Please also see the response to Issue #145.</li> </ul> </li> <li>2. 'Ministry of Tourism, Culture and Sport (MTCS)' has been replaced with 'Ministry of Citizenship and Multiculturalism (MCM)' when used in the context of the Ontario Government's cultural heritage programs, documents and functions.</li> <li>3. 'Cultural landscape' has been replaced with "cultural heritage landscape" in the context of cultural heritage resources.</li> </ol> | <p>Section 9.1, Section 17.3.2, Section 17.4.1, Section 23.2.1, Section 28.2, Table 16-2, Table 16-4, Table 20-3, Appendix D</p> | <p>Section 9.1, Section 17.3, Section 17.4, Section 26.2, Table 16-2, Table 16-3, Table 20-3, Appendix A, Appendix C</p> |

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|          | <p>project area.</p> <p>5. Update Table 15-4 as follows:</p> <ul style="list-style-type: none"> <li>› Caribou (Eastern Migratory population) – not currently listed under SARA3 but assessed by COSEWIC as EN (endangered)</li> <li>› Common Nighthawk – recently down listed to SC (special concern) under SARA</li> <li>› Eastern Wood-pewee – SC under SARA</li> <li>› Olive-sided Flycatcher – recently down listed to SC under SARA</li> <li>› Peregrine Falcon – recently removed from Schedule 1 of SARA</li> </ul> <p>6. Update Table 19-3 to clarify that Natural Resources Canada does not license the transport or the use of explosives.</p> <p>--</p> <p><sup>3</sup> SARA is short for <i>Species at Risk Act</i>.</p> | <p>4. Tables 16-2 (formerly Table 15-2) has been updated as requested.</p> <p>5. Table 16-4 (formerly Table 15-4) have been updated as requested, with the exception of Eastern Migratory Caribou, as they are currently not listed under Schedule 1. If the population becomes listed during the EA/IA process, it will be updated in future documents.</p> <p>6. Table 20-3 (formerly 19-3) has been updated to indicate that a license from Natural Resources Canada may be required for storage of explosives under the <i>Explosives Act</i>, and a permit may be required from Transport Canada for the transportation of explosives under the <i>Transport of Dangerous Goods Act</i>. The proponent will reach out to both agencies during the EA/IA to confirm what permits and licences are required.</p> |  |   |

BaP = benzo(a)pyrene, EA/IA = Environmental Assessment/Impact Assessment, EAR/IS = Environmental Assessment Report/Impact Statement, IK = Indigenous Knowledge, IIRU = Indigenous Land and Resource Use, N/A = Not applicable, RoC = Record of Consultation, SAR = Species at Risk, ToR = Terms of Reference.