STRENGTH
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UNITY

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Kenténha/October 6, 2026

Guillaume Clement-Mathieu
Analyst, Decision Statements
Impact Assessment Agency of Canada
Guillaume.clement-mathieu@iaac-aeic.gc.ca

Re: proposed amendments to the Decision Statement concerning the Contrecoeur Port Terminal Expansion Project (Contrecoeur Project)

Dear Mr. Clément-Mathieu,

The Mohawk Council of Kahnawa:ke (**MCK**) has reviewed the proposed amendments to the Decision Statement concerning the Contrecoeur Port Terminal Expansion Project (**Contrecoeur Project**) sent by the Impact Assessment Agency of Canada (**IAAC**) on September 4, 2026.

Following the issuance of IAAC's initial Decision Statement, the MCK has remained deeply involved in the Contrecoeur Project and meets regularly with the Montreal Port Authority (**MPA**) to discuss various aspects of the work and the MPA's implementation of the decision statement. As IAAC noted, the MCK has already made several submissions concerning the proposed changes to the Designated Project (June 10, 2025, August 27, 2025 and October 10, 2025), which we incorporate here.

MCK requests clarification of the "current practices" relied upon to "modify and consolidate" the project description. While IAAC's intention may be a good faith effort to standardize language and format, words matter – especially at this advanced stage of the project. MCK would like to understand, for example, the rationale for replacing, at this late stage, terminology like "truck control area" (which implies a single space) with "truck control facilities" (which could potentially be interpreted to include multiple spaces or infrastructures). The rationale for changing language is important to ensuring that these changes remain clerical in nature and are not relied upon to modify the project in scope or nature.

The MCK is concerned about the proposed changes to cl. 1.40 of the Decision Statement which completely erases Indigenous presence. While the MCK is not favourable to language that frames Indigenous Peoples as "included" in the "people of Canada", completely erasing our presence is not an appropriate solution. MCK therefore requests additional information for the rationale and justification for the proposed change.

Regarding the proposed changes to cl. 10.2, the MCK requests confirmation that the substation footprint show in Figure 1 of the draft Analysis report does not encroach on residual wetlands identified in the environmental assessment report, does not require vegetation clearing beyond what was assessed for the sediment storage area, and will not result in additional adverse effects on wetlands or wetland functions beyond those previously assessed.

Finally, as already raised in MCK's October 2025 submission, the *Freshwater Intake End-of-Pipe Fish Screen Guideline*, referenced at cl. 3.45, has been replaced by an Interim Code of Practice (https://www.dfo-mpo.gc.ca/pnw-ppe/codes/screen-ecran-eng.html). Given the Interim Code is under revision since 2023, the MCK advocates for wording that would require the most up-to-date Code of Practice to apply.

The MCK thanks IAAC for its attention to these matters and looks forward to receiving

In Peace and Friendship,

<Original signed by>

Ratsénhaienhs Ross Kakwirakeron Montour
Lead Portfolio Chief
Kahnawà:ke Tsi Ietsenhaientáhkwa
(Mohawk Council of Kahnawà:ke)

CC:

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