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Subject: Request for Comments on the Draft Environmental Assessment Report and Draft Potential Conditions for the Project 6 – All-season Road Linking Manto Sipi Cree Nation, Bunibonibee Cree Nation, and God’s Lake First Nation

The Impact Assessment Agency of Canada (the Agency) requested Natural Resources Canada (NRCan) make available appropriate specialist(s) with expert information or knowledge, to review the Draft Environmental Assessment (EA) Report and Draft Potential Conditions for the Project 6 All-Season Road Linking Manto Sipi Cree Nation, Bunibonibee Cree Nation and God's Lake First Nation (the project), proposed by Manitoba Transport and Infrastructure (the Proponent).

Specifically, NRCan was requested to comment on whether the Agency has:

- accurately and adequately characterized the potential environmental effects within federal jurisdiction (as it relates to NRCan’s mandate) and key mitigation measures, monitoring, and follow-up programs; and
- accurately and adequately summarised the analysis by the proponent, as well as the comments and views from your department.

NRCan participated in the environmental assessment process for the project pursuant to section 20 of the *Canadian Environmental Assessment Act, 2012* as the federal department responsible for administering the *Explosives Act* and possessing specialist or expert information or knowledge regarding explosives. NRCan has also provided a review of the Draft EA Report and Draft Potential Conditions based on its expertise in groundwater quantity, permafrost and acid rock drainage and metal leaching.

From a groundwater quantity perspective, NRCan did not have any additional comments but noted that the Proponent’s proposed mitigation and monitoring does not reflect the groundwater quantity mitigation and monitoring proposed by the Agency.

For permafrost, NRCan recommended that the text in the Draft EA Report be amended to reflect the mitigation outlined in the Environmental Impact Statement, and not solely by the removal of material, as stated in the EA Report.

NRCan emphasized the importance that material can be non-potentially acid generating but still have the potential to leach metals at neutral pH conditions. If the term “or” is omitted in certain conditions related to Metal Leaching and Acid Rock Drainage (ML/ARD), the requirement would apply only to material that is both metal leaching and acid-generating, rather than to either condition individually. Additionally, NRCan strongly recommended blasting sites and rock cuts be added to ML/ARD related conditions. Exposed rock faces such as rock cuts at blasting sites can be a long-term source of metal leaching and acid rock drainage. Additional comments are

recommended to provide more specificity on what would be followed in the Mine Environment Neutral Drainage program and the use of potentially acid generating material used as construction material.

NRCan did not have any additional comments related to the *Explosives Act*.

Details of NRCan's comments can be found in the attached Appendix A: Natural Resources Canada's Comments on the Draft Environmental Report and Draft Potential Conditions- Project 6 - All-Season Road.

If you have any questions, please do not hesitate to contact me via e-mail at vikash.narine@nrcan-rncan.gc.ca.

Thank you,

Vikash Narine
Senior Environmental Assessment Officer
Office of the Chief Scientist

cc:

Christina Clarke – A/Director, Impact Assessment Division
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