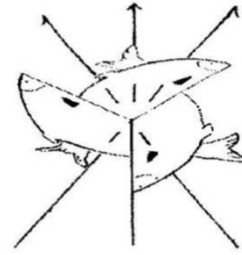


Keewatinook Fishers of Lake Winnipeg Inc.
Box 57 Dallas, Manitoba
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May 8th 2024

Minister of the Environment
Impact Assessment Agency of Canada
Lake Manitoba Lake St. Martin Lake Winnipeg Diversion Project

RE: Review and Comments on the Draft Environmental Assessment Report

Minister,

First I want to thank the IAAC and it's staff for the effort the Agency has made to accommodate the views of many people and communities that are reflected in the Draft Environmental Assessment and Conditions documents.

Keewatinook is pleased to table this submission of comments to the Impact Assessment Agency of Canada. We have reviewed the Draft Environmental Assessment as requested, and discussed it with the fishers and communities that we serve. For the information of the IAAC, we have been unable to find any support for the proposed Project among Fishers, Knowledge Keepers, Elders Chiefs, Counsellors and citizen Right-holders. All say NO to the Proposed project.

Here are specific key points from Keewatinook Fishers of Lake Winnipeg review of the Environmental Assessment Report Documents:

1. Section 35 Rights are referenced throughout IAAC document, and we are located in Manitoba under the NRTA in a Province that has not Affirmed our Section 35 Treaty Rights and Aboriginal Title Rights.

We call upon the Minister to ensure that the Province affirms our Section 35 Treaty Rights and Aboriginal Title Rights as part of the Project Consultation.

2. Any decision by the Minister or Governor in Council regarding the Project must be compliant to Canada's United Nations Declaration Act (UNDA) 2021. There is no consideration or mention of UNDA in the EA. Environment Canada and it's Agency IAAC are under the UNDA Action Plan that requires review of policy, legislation, services, etc.

We call upon the Minister or Governor in Council to consider UNDA in any decision made on the Proposed Project.

3. In section 3.2 Alternatives for the Project, the Province did not include the evaluation of using upstream control structures and or restoring natural river flood plains along the watershed etc., from sources in the United States through Manitoba to discharge in James Bay as an Alternative option to the Diversion. We noted that the IAAC is restricted to the existing scope of the Environmental Assessment for the project as defined by the Proponent. Our position is that the Province is obligated to consider Alternatives including improvement of Water Management Practices on both sides of the border.

We call on the Minister to place a Condition on the project to cause a review of international water management practices on the Red-Souris River basin as part of the Proponent's list of Alternatives to be considered.

4. Under section 8.3.3 Conclusions dealing with Fisheries that the IAAC acknowledges that the Project will contribute to Cumulative Effects leading to further loss of fish and fish habitat. Our position is

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that any further loss of fish and habitat is unacceptable. We are presently facing a catastrophic decline in whitefish in Lake St. Martin and Lake Winnipeg in the region of the outlet. Fishermen have reported that flooding in 2011, 2014 and record high waters 2022 transported sediments onto spawning beds, with near 95% reduction of whitefish reported this past winter fishery. The Diversion project will only add to volume of sedimentation.

We call upon the Minister to impose a Condition on the Proponent to conduct a scientific study of why the whitefish population has crashed in the region of the Diversion.

5. There are outstanding lawsuits between Lake St. Martin First Gov Province of Manitoba and the Government of Canada dating back to the 1964 first flood event at Lake St. Martin after the construction of the Fairford Control Structure, followed by at least three other lawsuits dating from the 1970s. And the lack of Comprehensive Settlement Agreement from the 2011 flood has left the LSM Community devastated.

We call on the Minister or Governor in Council and the Duty of Honour of Government Canada and Manitoba to first settle these outstanding legal claims as a Condition to this proposed Project.

6. Water is Sacred. The Province has underestimated potential impacts on the aquifer according independent scientific review There is a high risk to wells along the route, with possible damages to groundwater aquifer on a wider scale.

We call upon the Minister or Government in Council to reject the Proposed Project as it violates our Traditional Cultural and Religious Beliefs and poses ongoing threat to our water and our health,

In summary, Keewatinook Fishers of Lake Winnipeg rejects the proposed Project based on the words of the people that will be affected forever by this proposed project. our Rights, Traditions, fisheries, hunting, gathering of medicines, the resting place of our ancestors, and the lands and waters for the next seven generations are all threatened by this project. We call on the Duty of Honour of the Government of Canada to also reject this proposed Project.

Henry Traverse
Chairman
Keewatinook Fishers of Lake Winnipeg

Regards,

<Original signed by>

Henry Traverse
Chairman
Keewatinook Fishers of Lake Winnipeg

