



CONSTANCE LAKE FIRST NATION

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November 25, 2022

Impact Assessment Agency of Canada, Ontario Region
Attn: Caitlin Cafaro, Crown Consultation Coordinator
600 – 55 York Street
Toronto, ON M5J 1R7
Via e-mail: webequie@iaac-aeic.gc.ca

Re: Time Limit Extension Request for the Federal Impact Assessment Process of the Webequie Supply Road Project

Dear Ms. Cafaro,

I am writing in response to the IAAC's letter dated October 25, 2022, regarding the Time Limit Extension Request for the Federal Impact Assessment (IA) Process of the Webequie Supply Road (WSR) Project. Constance Lake First Nation (CLFN) was asked to provide input on the extension request and the WSR's engagement plans.

CLFN is in support of WSR's request for a timeline extension (to January 2027) to complete their IA, and understands the challenges and limitations placed on the IA to-date due to the global pandemic. CLFN also continues to experience ongoing challenges surrounding participation in this IA, and requests at this time that the Proponent increase efforts to engage and consult with CLFN directly.

Regarding the summary of Indigenous Engagement to-date (highlighted in Section 5.1 of the document), CLFN is concerned with the information provided in Table 5-2. No one from CLFN's Leadership or technical team attended the June 20th session. The invitation letter, one of hundreds of emails sent daily to Leadership, was simply missed, however the table misleadingly implies that a proper consultation event occurred at this date. CLFN's technical team has engaged with the WSR team previously (including a session in November 2020) and has provided appropriate technical community contacts. All engagement efforts need to include CLFN's full technical team, reiterated below:

- Chief Ramona Sutherland, Constance Lake First Nation (chief@clfn.on.ca)
- Councillor Wayne Neegan, Community Communications Liaison Officer (wayne.neegan@clfn.on.ca)
- Bertha Sutherland, Lands & Resources Officer (bertha.sutherland@clfn.on.ca)
- Stephen Peltonen, Consultation Coordinator (stephen.peltonen@clfn.on.ca)
- Kimberly Jorgenson, Four Rivers, CLFN Technical Support (kjorgenson@fourrivers.group)

CLFN would like to better understand the WSR team's plans for in-person engagement throughout the project, now that pandemic restrictions have eased. 22 Indigenous communities are listed as requiring engagement, however CLFN knows that a 'lesser level' of consultation effort is being applied to communities perceived to be further from the impacts of the project. CLFN would like to see efforts made to bring together all Indigenous communities engaged on this project for a collective discussion and knowledge sharing session.

Regarding the technical content of this document, it is far too complex for effective community-level conversations. Documents need to be made more approachable by being paired down or by providing summaries to clearly convey key messages. A thorough review of this document respective of CLFN's community communication processes was not possible.

Regarding the technical studies completed to-date, they appear to have been very limited in-scale, with the Regional Study Area (RSA) restricted to a buffer around the proposed road. The RSA would be more appropriately sized at the watershed scale, since all of the waters surrounding the project will be affected by the road's construction (impacting flows in the region, animal pathways, etc.). CLFN would also like to see the project take into consideration the full cumulative effects of impacts to the region as this road contributes to the opening of the Ring of Fire area for mineral development, forever changing the face of the north. The road cannot be discussed in isolation of the larger development looming on the horizon, since its very construction will increase the feasibility of mineral development in the area. It is not 'just a road' as the Proponent has insisted; indeed this proposal would not even exist in the absence of mineral development interests in the Ring of Fire.

CLFN welcomes continued engagement by the WSR team and the IAAC throughout this IA process.

Respectfully,

<Original signed by>

Councillor Wayne Neegan

cc. Chief Ramona Sutherland (chief@clfn.on.ca)
Chief Cornelius Wabasse (corneliusw@webequie.ca)
Michael Fox (michael.fox@supplyroad.ca)
Don Parkinson (don.parkinson@snclavalin.com)
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