



## WEENUSK FIRST NATION

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### **Webequie Supply Road Project**

Impact Assessment Agency of Canada

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RE: Review of Webequie Supply Road Project Draft Impact Assessment Report

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To whom it may concern,

As elected Chief of Weenusk First Nation (“WFN”), I write to you on behalf of the Nation. As part of WFN’s consultation with the Webequie Supply Road (WSR or the “Project”) my responsibility as Chief is to protect my Nation’s Section 35 rights. We, as a Nation, are signatories to Treaty No. 9 and hold rights throughout this treaty area.

WFN has reviewed the Draft Impact Assessment (“IA”) Report. Please find below our comments for consideration.

### **Overview of Process**

The Project is currently in Phase 3 of the Impact Assessment Phase of the Impact Assessment Agency of Canada’s (IAAC) Impact Assessment Process.

This Phase is meant to provide analysis of the direct and indirect effects under federal jurisdiction and propose conditions of approval.

### **Findings**

The Draft IA Report specifies that the Project will result in residual adverse effects to:

Residual Adverse Federal Effect	Significance	Why	Cumulative Effect
Fish and Fish Habitat	Significant to a Low Extent	Degradation and loss of habitat that may not be fully compensated and that would have limited spatial and temporal overlaps with effects from other projects.	Significant to a Low Extent



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Residual Adverse Federal Effect	Significance	Why	Cumulative Effect
Migratory Birds	Not Significant	Mitigation measures would limit infrequent residual effects to the project footprint, with minimal spatial and temporal overlap with effects from other projects.	Not Significant
Federal lands or Activities on Federal Lands	Not Significant	Habitat loss and degradation of caribou and wolverine habitat on Webequie First Nation Reserve interacting with habitat changes from other projects throughout the species' respective ranges.	Significant to a Low Extent
Physical and Cultural Heritage of Indigenous Peoples	Significant to a Low Extent	Partial degradation of sites of importance and sensory disturbances which would change the experience of Indigenous persons visiting those sites.	Significant to a Low Extent
Current Use of Lands and Resources for Traditional Purposes by Indigenous Peoples	Significant to a Low Extent	Displacement of species of importance for fishing, hunting, harvesting and gathering away from some preferred sites as well as reduced safe access and quality of experience within the project footprint.	Significant to a Low Extent
Health, Social, or Economic Conditions of Indigenous Peoples	Significant to a Low Extent	Added strain on social infrastructure and cultural continuity to Webequie First Nation from an influx of project-related workers, but in a context where Webequie First Nation demonstrated its willingness to withstand this strain to benefit from the project.	Significant to a Moderate Extent

## **Key Issue: Hydrology, Groundwater, and Peatland Interactions**

The Draft IA Report does not provide a detailed evaluation of the hydrological system which is a persistent issue from the Environmental Assessment Report/Impact Statement (“EAR/IS”).



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For example, the groundwater Regional Study Area is not defined, and there is limited consideration of the implications of peat compaction and altered flow regimes. This is illustrated in Section 2.1 which acknowledges hydrological changes but heavily relies on generalized characterizations. This is further illustrated in Section 4.3.3.1 which reports uncertainty on whether the floating road design will maintain peatland hydrological conditions.

It is recommended that the IAAC require additional detail for consideration of the hydrological system to ensure ongoing peatland integrity.

### **Key Issue: Design Standards Instead of Demonstrated Performance**

The Draft IA Report indicates that infrastructure integrity (e.g., the “floating road” and potential future surface treatments) will be maintained based on the future project owner’s adherence to design standards.

However, no site-specific validation of these methods was undertaken. As the Project is in remote, peatland conditions with major climate change stressors this lack of confirmation that the design standards are appropriate is insufficient.

Further, no consideration is given to potential changes in traffic loading (e.g., heavier mining trucks) or road design (e.g., conversion to an asphalt surface). This must be considered as these adjustments to project design could occur and are noted in the EAR/IS.

It is recommended that the IAAC require additional detail on design standards to ensure adequate assessment of project features.

### **Key Issue: Uncertainty**

The Draft IA Report relies on the baseline studies completed for the EAR/IS which were noted in our original comments on the final EAR/IS as being spatially limited (i.e., used regional proxies or watershed level assumptions), seasonally constrained, and containing limited detail on the ecological variability of the region.

There is acknowledgement of the uncertainty and limited site-specific information within the Draft IA Report in Section 2.1; further, Section 2.1.1.1 indicates that residual effects from degradation and loss of fish habitat would not necessarily be completely offset due to uncertainties about offset locations and compensatory measures. In addition, Section 4.3.3.1 reports uncertainty that the floating road design would maintain peatland hydrology.

This uncertainty does not provide WFN with confidence in the assessment and requires stringent monitoring requirements as conditions of approval to ensure compliance and that offsets adequately address habitat loss.



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### **Key Issue: Operations Phase Effects**

The Draft IA Report and the EAR/IS place disproportionate emphasis on construction-phase impacts while consideration of the long-term operational effects such as changes to access and impacts to harvesting are not evaluated sufficiently.

For example, Section 4.3.1 acknowledges that increased access to the area will result in a reduced quality of experience by land users, but this is not explored in depth or in relation to WFN. Section 2.1.1.3 comments on increased access to the area for fishing and explores worker restrictions but does not explore this in terms of WFN fishing in sufficient depth.

It is recommended that the IAAC review the provided Existing Conditions Report prepared by WFN for the Webequie Supply Road Project and review submitted comments on the draft and final EAR/IS to ensure operations phase effects are sufficiently characterized.

### **Key Issue: Deferral**

The Draft IA Report also defers critical elements of the project to the detailed design phase or to the future proponent/operator. This prevents verification of the mitigation effectiveness, the monitoring roles for WFN, and enforcement of commitments made in the EAR/IS. This is problematic as there is no guarantee that these items will be resolved in the detailed design phase or adequately tracked and addressed by the forthcoming proponent.

WFN requires additional consultation on how these deferred issues will be tracked and appropriately addressed.

### **Key Issue: Over-Reliance on Assumptions of Mitigation Effectiveness**

Across the Valued Components noted in the Draft IA Report, there are assumptions made that mitigation will be effective without examples demonstrating past success with those methods. The impacts to these Valued Components have residual effects characterized as low despite the acknowledged uncertainty; and there is heavy reliance on future regulatory controls to justify the conclusions. For example, Section 2.1.1.2 notes that there is uncertainty related to spill response in peatlands, Section 2.1.1.1 notes that there is difficulty in offsetting habitat in a pristine environment such as this.

It is recommended that the residual effects ratings be re-evaluated with the appropriate characterization of uncertainty to ensure accurate classification.

### **Key Issue: Indigenous Knowledge in Significance Ratings**

While Indigenous Knowledge is acknowledged as an input into the Draft IA Report, there is no consistent demonstration on how this information influenced the outcomes or significance ratings. Instead, the Draft IA Report generalizes community input and highlights technical and regulatory frameworks in the conclusions.



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WFN requires additional consultation on how Indigenous Knowledge from our provided Existing Conditions Report for the Webequie Supply Road Project influenced the significance ratings.

### **Closing**

We look forward to continued engagement with the IAAC to ensure the final IA Report is sufficient to make recommendations to the Minister.

Sincerely,

<Original signed by>

Chief Joey Hunter  
Weenusk First Nation