



# Kashechewan First Nation Chief and Council

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Delivered by Email

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## **RE: Kashechewan First Nation Review and Comments on the Webequie Supply Road Draft Impact Assessment Report**

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To Whom it May Concern,

I am writing as the elected Chief of Kashechewan First Nation (“KFN”). This letter and comments are submitted on behalf of myself, the Council, and Nation members of KFN. As the Chief of my Nation, it is my duty to protect our Section 35 rights exercised throughout Treaty 9, of which we are signatories.

We have completed a detailed review of the Draft Impact Assessment (“IA”) Report for the Webequie Supply Road. While KFN members may not frequent the Project area for the exercise of all their rights, there is acknowledgement that impacts in that area may be felt throughout the KFN territory, particularly impacts to water and flow patterns.

### *Inclusion of KFN Information*

Previously, KFN has found the final Environmental Assessment Report/Impact Statement (“EAR/IS”) incomplete as there was a lack of inclusion of the draft Kashechewan First Nation Existing Conditions Report in the various sections of the EAR/IS.

Based on this comment, KFN made three requests: (1) continued engagement between Kashechewan First Nation and Webequie Supply Road Project Team and Webequie First Nation, (2) incorporation of the provided report into the EAR/IS, and (3) development of mitigation and

monitoring programs that reflect KFN feedback, where required. These requests remain outstanding.

This lack of meaningful integration persists in the Draft IA Report. Currently, Kashechewan First Nation information is included at a high level and is not demonstrably integrated or traceable from the Draft IA Report to the Existing Conditions Report. Indeed, Section 12.1.5.1 references general Indigenous input but has no community-specific details. The Draft IA Report does not include the Kashechewan Existing Conditions Report as a source document in its analysis, and it does not demonstrate how Kashechewan-specific information was integrated into the effects assessment or significance determinations. For example, there is a lack of consideration of the interconnected KFN Valued Components which is key Indigenous Knowledge shared by KFN. This Indigenous Knowledge is foundational and inseparable from KFN's worldview; whereas the Draft IA Report treats Indigenous Knowledge as an input.

It is recommended that the IAAC review the Existing Conditions Report and work to integrate this, and Kashechewan comments on the EAR/IS into future iterations of the IA Report.

#### Mitigation

Consistent with the EAR/IS, mitigation in the Draft IA Report is framed as regulatory compliance, standard practices, or is deferred to future plans. For example, fish habitat mitigation and habitat offsetting is deferred to the detailed design permitting phase ; water and air mitigation heavily relies on modelling and compliance with existing standards; and overall, mitigation measures are not clearly differentiated from standard regulatory requirements. The IA Report, in most cases, does not demonstrate project specific mitigation measures.

It is recommended that the IAAC ensure the conditions of approval comprehensively require follow-up monitoring in all instances where mitigation measures rely on regulatory compliance, standard practice, or is deferred to future plans. The IAAC should also include KFN as a potentially impacted Indigenous group to be involved in future monitoring initiatives to ensure compliance.

#### Water Quality and Monitoring

In previous comments on the draft and final EAR/IS, KFN noted concern with water quality, including surface water, and the impacts contaminated water could have downstream. This was linked with Kashechewan's desire for participation in ongoing water monitoring.

Within the Draft IA Report, water monitoring is referenced as being undertaken during and post road construction but is not tied specifically to Kashechewan in a way that makes us confident we will be involved.

It is recommended that the IAAC ensure the conditions of approval comprehensively require follow-up monitoring specifically related to water quality. The IAAC should also include KFN as a potentially impacted Indigenous group to be involved in future monitoring initiatives to ensure compliance.

Peat Removal and Impacts to Climate Change

In the draft Kashechewan First Nation Existing Conditions Report, KFN shared concerns for the removal of peat in relation to the Project and the impacts to ecosystem function and contribution to climate change as a result.

In our review of the final EAR/IS many details were unclear; particularly in relation to the clearing of peat in locations of temporary construction areas or camps, and how the removal/clearing of vegetation will differ in areas containing peat from areas without. Additionally, within the EAR/IS it is noted that there is a possibility that any peat under the floating roadway may compress and/or dry over time and release carbon. In the instance of converting the floating roadway into a paved/permanent road in 3-5 years, it is not clear if additional peat removal was contemplated to create a structurally stable road base for the paved/permanent WSR.

Within the Draft IA Report, there is partial information on road conversion and peat impacts but there is no detailed consideration of peat removal due to compression or additional peat removal in the event of road paving.

As this could reduce permeability and may alter the natural groundwater flow, this must be considered by the IAAC in future iterations of the IA Report.

Cumulative Context

In the KFN Existing Conditions Report, we identify existing cumulative stressors such as the Victor Mine, various dams, and overall climate change. These cumulative stressors are central to the impact pathways identified in our Report. They describe diesel contamination, wildlife displacement, hydrological changes, and declining species trends.

The Draft IA Report does consider cumulative effects but in a more limiting way and it does not explicitly reflect our observations or lived experience shared in the Existing Conditions Report. It is recommended that the IAAC work to integrate additional details from the KFN Existing Conditions Report into the cumulative effects context.

Closing

Thank you for your consideration of KFN's comments and concerns with Draft IA Report, we look forward to further consultation with the IAAC on this matter as it progresses.

Meeg-wetch,

<Original signed by>

Chief Hosea Wesley