

Comments on the Federal Ministerial Review of the WSR Project

1. On [Page 17](#) it is stated *As proposed, the project would connect Webequie First Nation to existing mineral exploration activities and potential future mineral development in the Ring of Fire area. The project also could become part of a future all-season road network connecting Webequie First Nation and the Ring of Fire area to the provincial highway system at Nakina.* This project is not economically feasible without mines and mines require highway access. Work is beginning to upgrade the Anaconda and Painter Lake roads that will lead to these mines. Work has been done in Geraldton to upgrade infrastructure for these roads to future mines. It seems fallacious to speak of these happenings using words like potential and possible.
2. On [Page 18](#) it is stated *The purpose of the project is to allow for movement of supplies and people from the Webequie First Nation Airport to the McFaulds Lake area, provide socio-economic development opportunities to the community of Webequie First Nation and meet the need of improved community well-being through enhanced access to jobs and training, including for the community's youth.* This doesn't really make sense as the McFaulds Lake projects require road access to southern highways. No McFaulds Lake mines and there is no need for transit of supplies and people, no economic development opportunities etc... The entire statement is nonsensical. Is there some reason that this is forbidden from expressing linkage to the NRL and MFFN-CAR projects?
3. On [Page 21](#) it is stated *the extent to which the likely effects of the project contribute to sustainability.* The sustainability of what?
4. On [Page 21](#) it is stated *Annex XX lists the section 22 factors and specifies, as applicable, where they are included in this IA Report.* Where is this Annex XX ?
5. On [Page 22](#) it is stated *The proponent and ECCC noted that climate change effects would not have tangible repercussion on the road integrity as the project is adopting, and in some cases exceeding provincial standards, guidelines and codes for the design, operation and maintenance of provincial highways.* Are there not likely to be problems with the roadway being designed for a maximum 18 ton load? There are certainly likely to be heavier trucks using this road. I hear rumours of roads in Eeyou Istchee being used by trucks that are heavier than the roads were designed for resulting in rapid degradation.
6. [Page 23](#) It seems likely that desires for/or by tourists wanting to camp in the area will lead to establishment of private or provincial campgrounds.
7. On [Page 25](#) it is stated *IAAC provided \$55, 000 in participant funding to help the public participate in the impact assessment.* This seems like an incredibly tiny amount for a project expect to cost well in excess of \$500,000,000. Is this correct?
8. On [Page 32](#) it is not mentioned that a likely cumulative effect of the WSR will result in invasive fish species coming into new drainage basins through which they as aquatic can now spread. These species have brought about the extirpation of native species in other areas.
9. On [Page 36](#) it begins discussing migratory birds. In particular there are concerns about the habitat lost via road construction and operation. The proponents have suggested offsetting this via donations to a bird habitat ngo in Columbia. As an alternative to this Mushkegowuk

suggests committing to installing and maintaining a MOTUS tower by working with Birds Canada. This area is very lacking in data and this very promising work would serve to monitor any harmful or beneficial effects from the WSR and potentially find new species that appear in the habitats created. <https://www.birdscanada.org/bird-science/motus-wildlife-tracking-system>

10. On Page 36 it is stated *the project is likely to result in limited and infrequent injury or death of species at risk and eastern migratory caribou*. Mushkegowuk Council disagrees with this statement and sees the WSR as contributing to the decline of the population via habitat loss and degradation, increased human access and therefore hunting pressure and other effects. The populations of some species might be maintained if they were considered more valuable. Further mitigation measures that could be considered are seasonal road closures, limiting road use to daytime only, controlling road access, building designated wildlife crossings or even constructing predator exclusion zones for calving Boreal Caribou.
11. On Page 46 it is stated *Due to spatial distance, other projects are not likely to cause effects to the atmospheric environment on Webequie First Nation Reserve land*. This seems to ignore the recent acid rain debacle that found effects 1500kms away, the worldwide deposition of mercury and a few other long distance mechanisms that can transport pollutants.
12. On Page 46 it is stated *inform Indigenous communities as soon as feasible, and IAAC within 48 hours, while providing:*
 - o the date, time, and location of the accident or malfunction;
 - o a summary of the accident or malfunction;
 - o the substance and quantities released;
 - o the relevant authorities notified and involved in the response;

Would that only apply to certain types or magnitude of accident or as per existing regulations? For example spills of less than 100 litres of hydrocarbon are only handled internally at present.

13. On Page 65 it is stated the proponents proposed mitigation for caribou. It omits many mitigations seemingly due to cost. I guess the proponents are putting a price on the species?
14. On Page 65 it is suggested that offsetting measures can mitigate these negative impacts the road is going to have on caribou but the only details Mushkegowuk Council has seen proposed is the untenable idea of preservation of a small piece of land. This species requires much vaster territories if it is to continue to exist or more intensive management as mitigations to offset the coming disruptions begun by the creation of the WSR.
15. On Page 66 it is stated *Vehicular collisions with caribou and other ungulate species*. I believe moose are the only other ungulate species where the WSR is being planned. Unless cows or horses are being considered maybe?
16. On Page 71 Under the heading **Recommended mitigation measures** a few really great recommendations could be improved by the addition of recommended dates, wind speed parameters and noise or dust limits for future guidance.
17. On Page 72 Under the heading Recommended mitigation measures that would be potentially ensured by the Government of Ontario it would be good to see a ban on camp pets(feral cat populations are devastating song bird populations in many places). Another suggestion would be that personal work gear(particularly boots) are kept at camp(personal

lockers?) when fly-in fly-out workers go off shift to prevent the transport of invasive species or pathogens.

18. On [Page 132](#) You state *The project would also support Indigenous-led business development and procurement, including project-related opportunities for local contractors, suppliers, and service providers. Once in operation, the road would enhance **physical access to Indigenous communities, regional mobility** and labour force participation, facilitate access to education and training opportunities, and support community-driven economic initiatives for Webequie First Nation.* Parts of this statement concerns the 3 sections of road and not just the WSR does they not?
19. [Page 133](#) You state *Improved year-round access* see comment #18
20. [Page 134](#) You state *Improved year-round access* see comment #18
21. [Page 135](#) You state *Improved year-round access* see comment #18

General Comments

Deadlines for comments were initially 2X as long for affected indigenous communities in these processes. This was justified as being extended due to the increased relevance of these comments and the more difficult transfer of information in remote communities. An example of this difficulty might be Kashechewan's numerous evacuations due to a recently pathogenic water supply or spring flooding. This extension of the comment periods only occurred once however and there was never a rationale for this effective truncation and thereby stress applied to communities to review documents according to the same schedule as say, Torontonians.

Comment deadlines allowed time for review seemingly based on the release date of the main document. This document was incomplete in the majority of cases and many of the appendices released at a later date with consequently much less time for reviewing. I would suggest that the main document should not have been released before all the data could be given to the reviewers. This piecemeal release was also very confusing for a reviewer and many times the document would refer to appendices that were not available to the reviewer. It was hard not to see this obfuscation as useful to some.

The lack of comments need be considered a message. Perhaps an indicator that consultation techniques weren't of the best. This cannot be ignored if FPIC is really to be respected.

The frequent announcements by politicians of the certain approval of this project (announcements of it beginning in 2026 even before the draft EA/IS was submitted) removed much of the interest from people feeling comments had value and they were being listened to at all.

It is of concern to me that comments from Mushkegowuk Council are paraphrased and condensed by the proponent such that the original comment's message intent is lost. This communication confuscation results in commenting from all First Nations being difficult. I don't buy the idea that confidentiality concerns make this necessary. I think perhaps FNs should indicate whether or not they wish secrecy such that the proponents are the only ones to hear their comments. This is a persistent flaw as the documents have progressed and seems to have resulted in losing excellent comments acquired via emails, in-person community engagement sessions, internet webinar feedback, radio call-in shows, Facebook pages, draft documents, final documents and onto Ministerial Review. I understand that this is impossible to address at present but perhaps in future projects the decision made by the Minister would benefit from hearing the people's voices more directly.