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January 27, 2020

Caitlin Cafaro, Crown Consultation Coordinator
Impact Assessment Agency of Canada
600-55 York Street, Toronto, ON M5J 1R7
Email: IAAC.MartenFalls.AEIC@Canada.ca

Dear Ms. Caitlin Cafaro,

RE: Draft Indigenous Engagement and Partnership Plan and Draft Tailored Impact Statement Guidelines for the Marten Falls Community Access Road Project Impact Assessment

On December 19th, 2019 the Impact Assessment Agency of Canada (IAAC) sent a letter to Aroland First Nation (AFN) inviting comments on the Draft Indigenous Engagement and Partnership Plan (IEEP) and the Draft Tailored Impact Statement Guidelines (TISG) for the Marten Falls Community Access Road Project Impact Assessment. In this submission, we first provide our comments on the proposed IEEP, followed by our review of the draft TISG.

AFN has a unique relationship with the lands and waters throughout our ancestral lands. The proposed road lies within our traditional territory in an ecologically unique area that has not historically been well studied. The region retains archaeological, social, cultural, economic and spiritual significance to our community and serves as a gateway to some of our community's prime harvesting locations. Stewardship and the protection of the environment are a foundational component of AFN's way of life and frame our perspectives on and interactions with the land.

It is our position that presenting the Project in isolation without considering the cumulative effects of other proposed all-season road and mining projects in the region under-represents the potential impacts of the project. AFN holds the position that a regional assessment is absolutely necessary to assess the impacts of potential mineral development activity and its supporting infrastructure in the Ring of Fire. Once operating, all-season roads like this one will enable extensive mineral exploration development activities with widespread cumulative effects on our people, our way of life, our community well-being, and our inherent and established Aboriginal and Treaty rights.

Aroland recognizes the need and right for Marten Falls First Nation (MFFN) to be connected to the highway network to provide easier access and more opportunities for MFFN members and reduce the costs associated with remote fly-in communities (e.g. higher cost of food and goods/services). However, given that both of the Project's proposed right of ways traverse AFN's traditional territory and that in order for traffic to reach the provincial highway system, further road access would be required through our territory and community, it is our position that the Project will have significant effects on our inherent and established Aboriginal and Treaty rights. We anticipate that the Project will significantly, permanently and irreversibly affect our ability to hunt, trap, gather and

engage in ceremony and traditional activities. Among First Nations in the region, AFN is the most at risk and will be the most affected by the Project, and its cumulative effects.

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In order to ensure that we are able to adequately participate throughout the process, to raise potential impacts, ensure adequate mitigation of effects and ensure that the costs do not outweigh the benefits, it is AFN's position that a proper collaborative planning process and a role for AFN in the co-management of the MFFN Community Access Road is a required condition to obtain AFN's support. AFN has sent a draft Memorandum of Understanding (MOU) to MFFN that sets out a two-way relationship for information sharing throughout the Project to this effect and expects to finalize the MOU with MFFN before the IAAC commences the Impact Assessment process for the Project.

Respectfully,

<original signed by>

Councillor Sheldon Atlookan
Aroland First Nation

Cc: Hon. Catherine McKenna, Federal Minister of Environment and Climate Change

APPENDIX 1: Review – Draft Indigenous Engagement and Partnership Plan

What follows are recommendations regarding how AFN would like information to be shared with our community, how we would like to be consulted and how we would like to share our knowledge throughout the impact assessment process.

General Comments

- In 2016, the Government of Canada adopted the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). UNDRIP introduced the concept of the right to Free, Prior, and informed consent as a new consideration for the Crown and resource development proponents. More specifically, Article 32.1 of UNDRIP sets the direction that ought to be taken by the Crown and resource companies when consulting with Indigenous Peoples. Article 32.1 of UNDRIP states that Indigenous Peoples shall be consulted in good faith through their own representative institutions in order to obtain their free and informed consent prior to the approval of any project affecting the community's lands or resources.
- The purpose of consultation throughout the assessment process is to document and understand how the Project may impact AFN's (and other Indigenous communities') Aboriginal and Treaty rights and interests and collaboratively develop avoidance, mitigation and accommodation measures to address those impacts. Consultation requires accessible and frequent updates to allow for meaningful participation and consideration. AFN's leadership requires meaningful engagement in order to provide their free, prior and informed consent to the Project.
- The proposed Project is located directly within AFN's traditional territory and AFN community members have extensive use and interests in the area. This gives our community a special relationship to the Project. AFN's traditional knowledge and land use (TKLU) information must be considered throughout all phases of the assessment, including but not limited to: the development of spatial and temporal boundaries utilized in the effects assessment; the characterization of baseline conditions; the assessment of adverse effects; the identification of appropriate mitigation and monitoring measures; and characterizing residual effects. AFN's TKLU information must be considered in an equal way to western science throughout the process.
- AFN requests a community-specific consultation plan/process agreement to be developed collaboratively between AFN, IAAC and MFFN. This plan should include a glossary with agreed upon terms to be defined, including the term 'collaborative approach.' AFN is developing an MOU with MFFN and the contents of this agreement should be reflected within the consultation plan/process agreement.
- AFN would like all engagement efforts to seek input from diverse groups within our community, including elders, youth, women and men both on- and off-reserve.
- All community meetings should include a community-hired Ojibway translator. Funding should be provided to compensate the translator and support the hiring process.
- Capacity building activities, discussion and workshops should be provided at the outset of each phase of the Impact Assessment process. The Impact Assessment process is new and will take place over several years which underpins an ongoing need for relevant capacity building. As capacity and learning around the new *Impact Assessment Act* increases, AFN may provide more specific feedback regarding activities and engagement approaches for each phase of the process.

- At the conclusion of each phase, provide opportunity to provide comments and identify lessons learned to advance into subsequent phases of the impact assessment and future impact assessments in the region.
- Any consultation efforts should reference how the Project fits into the broader Ring of Fire regional development in the area as well as the cumulative impacts affiliated with those developments. This objective is best met through a Regional Assessment Process.

Phase 2: Impact Statement

Proponent Develops Impact Statement

In addition to the activities listed within the Draft IEEP, AFN would like the following consultation measures to occur:

- IAAC/MFFN should engage AFN to co-develop and participate in all baseline studies within AFN's territory. This could be fulfilled through the hiring of environmental and cultural heritage monitors to participate alongside study area specialists when conducting baseline research. Participation and co-development at an early phase within the baseline research will help to streamline subsequent reviews of the research and will aid in the effort of braiding Western Science and Indigenous Knowledge. Participant funding will be required for this step.
- IAAC/MFFN should engage AFN to conduct a TKLU Study concurrently with baseline studies to ensure Traditional Knowledge is meaningfully included at an early phase within the Impact Statement.
 - As part of the TKLU Study, IAAC/MFFN should work with AFN to collaborate on conducting an effects assessment of the project on AFN's TKLU. This engagement should take the form of a workshop in which AFN and IAAC/MFFN should review and discuss all sites the Project may potentially impact and discuss specific mitigation/accommodation measures. Based on the results of the workshop, IAAC/MFFN should engage AFN in the writing of the Impact Statement on their TKLU. Capacity funding will be required for AFN to adequately participate.
- AFN will work collaboratively with IAAC/MFFN to develop a confidentiality/sharing agreement to ensure AFN's information is adequately protected while the Impact Assessment can proceed with appropriate information. The confidentiality agreement will follow OCAP guidelines.
- In addition to in-community meetings and teleconferences, IAAC/MFFN should engage AFN community members via mail outs, posters and social media.

Phase 2: Impact Statement

Upon proponent submission of Impact Statement

In addition to the activities listed within the Draft IEEP, AFN would like the following consultation measures to occur:

- IAAC should provide participant funding to allow AFN to adequately participate in the review of the Impact Statement and all other activities affiliated with this phase of the regulatory process.
- IAAC should respect AFN's reasonable timelines and circumstances for participating in consultation.

Phase 3: Impact Assessment

Part 1 – Immediately following notice that Agency is satisfied that the proponent has provided the required information or studies

In addition to the activities listed within the Draft IEEP, AFN would like the following consultation measures to occur:

- The IEEP/community-specific consultation plan should be implemented at the outset rather than being initiated at this phase
- In addition to teleconference meetings, MFFN/IAAC should engage AFN at this phase via in-person meetings to Chief and Council and the community (both on and off reserve). At these meetings, MFFN/IAAC should present an update on the Project and solicit feedback. MFFN/IAAC should also provide an update to the community via mail outs, posters and social media.
- Upon request, plain language summaries of the Impact Statement should be made available in Ojibway for community members who do not speak English/French.

Phase 3: Impact Assessment

Part 2 - Agency's Impact Assessment Report, including consultation summary, and Potential Conditions

In addition to the activities listed within the Draft IEEP, AFN would like the following consultation measures to occur:

- Upon request, plain language summaries of the Impact Statement should be made available in Ojibway for community members who do not speak English/French.

Phase 4: Decision Making

In addition to the activities listed within the Draft IEEP, AFN would like the following consultation measures to occur:

- IAAC should come to AFN to present the decision on the Project to Chief and Council and to community members both on- and off-reserve.
- Within the presentation, IAAC should summarize all avoidance, mitigation and accommodation measures that will occur for AFN as well as all opportunities for Indigenous community members to participate in the Project.

Phase 5: Post IA Decision

In addition to the activities listed within the Draft IEEP, AFN would like the following consultation measures to occur:

- Should a Monitoring Advisory Committee be established, AFN monitors must be directly involved in monitoring, planning and implementation for the entirety of the Project's lifecycle. Training should be provided to all monitors.
- Monitors should report back to the Monitoring Advisory Committee; in turn, the Monitoring Advisory Committee should report back to regulators of the Project.
- Capacity funding should be provided to support monitor-related employment.

APPENDIX 2: Review – Draft Tailored Impact Statement Guidelines

Section	Comment	Recommendation
Section 2 Overview		
2.3 Project Location	The information to be included, and where appropriate, located on map(s) does not provide for information that may be available from Indigenous governments and Indigenous groups with respect to environmentally sensitive sites, habitats of species considered to be at risk by Indigenous governments and Indigenous groups, landscape features of importance to Indigenous governments and Indigenous groups, land designations considered within Indigenous land use plans, and potable water sources including spring water sources.	Revise Section 2.3 to be inclusive of information that may be available to be publicly shared from Indigenous governments and Indigenous groups with respect to environmentally sensitive sites, habitats of species considered to be at risk by Indigenous governments and Indigenous groups, landscape features of importance to Indigenous governments and Indigenous groups, land designations considered within Indigenous land use plans, and potable water sources including spring water sources.
Section 3 Project Description		
3.2.1 Site preparation and construction 3.2.2 Operation 3.2.3 Suspension, abandonment or decommissioning	Road rights-of-way are likely to incorporate other infrastructure. As a result, the project description should include any planned or anticipated co-location, construction, or site preparation anticipating construction, of additional right-of-way infrastructure such as, but not limited to, transmission lines, telecommunication infrastructure, pipelines.	The project description should include -in construction, operation and suspension, abandonment or decommissioning sections, any planned or anticipated co-location, construction, or site preparation anticipating construction, of additional right-of-way infrastructure such as, but not limited to, transmission lines, telecommunication infrastructure, pipelines.
3.2.2 Operation	In addition to the anticipated road use examples in the text – “e.g. Eagle’s Nest...”, road use will likely include: <ul style="list-style-type: none"> Indigenous road users using a future all-season road from Eabametoong First Nation connecting near the junction of the Anaconda/Painter Lake forestry road significant use by mineral exploration companies to access a multiplicity of claim areas for exploration and advanced exploration Indigenous, provincial and federal government agencies and service providers 	In addition to the anticipated road use examples in the text, please include the following likely road users/users: <ul style="list-style-type: none"> Indigenous road users using a future all-season road from Eabametoong First Nation connecting near the junction of the Anaconda/Painter Lake forestry road significant use by mineral exploration companies to access a multiplicity of claim areas for exploration and advanced exploration Indigenous, provincial and federal government agencies and service providers

	<ul style="list-style-type: none"> • Use of winter roads by the proponent <i>and others</i>, during operations. 	<ul style="list-style-type: none"> • Use of winter roads by the proponent <i>and others</i>, during operations.
Section 4 Project Purpose, Need and Alternatives Considered		
4.1 Purpose of the Project	<p>“Participants” is not specific enough to also include users of the Project.</p>	<p>Please consider changing this sentence: “Proponents are encouraged to consider the perspectives of participants (i.e., public, Indigenous groups, governments) in establishing objectives that relate to the intended effect of the project on society.” To: “Proponents are encouraged to consider the perspectives of participants, <i>and Project users</i> (i.e., public, Indigenous groups, governments) in establishing objectives that relate to the intended effect of the project on society.”</p>
4.2 Need for the Project	<p>The proponent should provide supporting information that demonstrates the need for a project, inclusive of needs expressed by other parties that may share the need for the project (i.e., public, Indigenous groups, governments).</p>	<p>Please consider changing this sentence: “The proponent should provide supporting information that demonstrates the need for a project.” To “The proponent should provide supporting information that demonstrates the need for a project, inclusive of needs expressed by other parties that may share the need for the project (i.e., public, Indigenous groups, governments)”.</p>
Section 6 Description of Engagement with Indigenous Peoples		
6 Description of Engagement with Indigenous Peoples	<p>The guidelines stipulate that the proponent must provide opportunities to Indigenous groups to:</p> <ul style="list-style-type: none"> • “provide Indigenous knowledge during baseline data collection; • comment on the list of VCs and indicators; • inform the effects assessment and review its conclusions; and • inform the development of mitigation measures and follow-up programs.” <p>To meaningfully engage and participate in the above activities, proponents must also provide capacity to Indigenous groups. In addition, there should be a stronger commitment and effort from the proponent to work collaboratively with Indigenous groups to co-develop VCs, mitigation measures and follow-up programs.</p>	<p>Please consider adding the word “capacity” to the following sentence: “In addition to the requirements set out in section 6.1, 6.2 and 6.3, the proponent must provide Indigenous groups with an opportunity <u>and capacity</u> to.”</p> <p>Recommend that the language in the bulleted list be strengthened to:</p> <ul style="list-style-type: none"> • <u>co-develop</u> the list of VC’s and indicators; • <u>jointly participate</u> in the effects assessment and review its conclusions; and • <u>co-develop</u> mitigation measures and follow-up programs.

6.2 Analysis and response to questions, comments and issues raised	Article 32.1 of UNDRIP states that Indigenous Peoples shall be consulted in good faith through their own representative institutions in order to obtain their free and informed consent prior to the approval of any project affecting the community's lands or resources. The analyses and responses section should include the consideration of how/if consent has/will be sought.	In addition to, the analysis and responses outlined in the bulleted list, AFN recommends additional bullets be added specific to free, prior and informed consent: <ul style="list-style-type: none"> • where and how the proponent supported Indigenous groups' free, prior and informed consent; • description of future activities and processes that consider and support Indigenous groups' free, prior and informed consent.
6.2 Analysis and response to questions, comments and issues raised	In this section of the guidelines, there is a bulleted list outlining what should be included the analysis and response. For clarity, stronger language will hold the proponent accountable to undertaking the necessary activities outlined in the bulleted list.	Please consider replacing the words "are to include" to "must include" to ensure proponent is held to account on delivering the analyses and responses necessary to support a meaningful process.
6.2 Analysis and response to questions, comments and issues raised	The value and role of Indigenous Knowledge in building the Impact Statement and supporting decision-making on for the Project is reflected in the guidelines. However, there are agreements and understanding that must be put in place to support and empower Indigenous groups to share Indigenous Knowledge to support the process.	The guidelines must include direction to the proponent to secure confidentiality agreements with AFN and other Indigenous groups to ensure that any Indigenous Knowledge that may be shared is protected from unauthorized disclosure and inappropriate use.
Section 7 Baseline Conditions		
7.2 Sources of baseline information	Indigenous government land use studies and management plans may be available; Indigenous forestry management plans may be available from Indigenous forest management bodies.	Please include land use studies and management plans available from Indigenous governments as sources of baseline information, and Indigenous forestry management plans from Indigenous forest management bodies.
Section 8 Baseline Conditions Biophysical Environment		
8.6 Groundwater and surface water	Springs and spring water are important to Indigenous peoples, and may have spiritual value and value for land users.	AFN wishes to acknowledge and support the inclusion of the requirement to "identify all springs and any other potable surface water resources within the local and regional project areas and describe their current use, potential for future use, and whether their consumption has Indigenous cultural importance".
8.12 Species at Risk	Indigenous groups may consider certain species to be at risk with respect to local and regional contexts, traditional territories, and harvesting practices and uses.	Please amend this section to include reference to species that Indigenous groups may consider to be at risk with respect to local and regional contexts, traditional territories and harvesting practices and uses. Furthermore, Indigenous

		knowledge should be included where available for detecting all species at risk and habitat, migration corridors, spawning areas, etc.
Section 10 Baseline Conditions - Social		
10 Baseline Conditions Social	To understand the community context, the information provided must describe influences on Indigenous community well-being with respect to lack of availability of all-season transportation services between Indigenous communities, and between Indigenous communities and services and goods available through connectivity with the provincial highway system.	To understand the community context, the information provided must describe influences on Indigenous community well-being and intra- and inter- community cohesion with respect to lack of availability of all-season transportation services between Indigenous communities including such matters as governance, recreational interactions and sports tournaments, and health and well-being services, and; interactions between Indigenous communities and services and goods available through connectivity with the provincial highway system including similar matters together with access to provincial and federal government services.
Section 11 Baseline Conditions - Economic		
11 Baseline Conditions - Economic	To understand the community economic context, the information provided must describe influences on Indigenous community economic conditions with respect to lack of availability of all-season transportation services between Indigenous communities, and between Indigenous communities and services and goods available through connectivity with the provincial highway system.	To understand the community context, the information provided must describe influences on Indigenous community economic conditions, and intra- and inter- community economic conditions with respect to lack of availability of all-season transportation services between Indigenous communities including such matters as trade, flow of goods and services, cost to transport goods and services, etc.
11 Baseline Conditions - Economic	Aroland First Nation, together with Ginoogaming First Nation and Animbiigoo Zaagi'igan Anishinaabek have published a regional economic development plan linking major gold mining initiatives in the Geraldton area adjacent to the Trans-Canada Highway, with mineral exploration and project development that will be catalyzed/enabled/supported by the growth of mining services in the region, including the Ring of Fire.	Aroland First Nation will be expecting that its "Mining Hub" regional economic plan is referenced as part of the economic baseline information for the IA.
Section 12 Baseline Conditions - Indigenous Peoples		
Section 12 Baseline Conditions - Indigenous Peoples	The guidelines outline that proponents are required to engage with Indigenous groups but provides no explicit guidance and reference to methods/approaches to engaging Indigenous groups.	Recommend that the guidelines explicitly include direction to the proponent to work with each Indigenous group to determine the methods and approaches to engagement.

	How the proponent engages with Aroland First Nation is incredibly important and approaches undertaken in one community may not be appropriate for another. Aroland First Nation would like to influence, and jointly develop community specific engagement approaches to support effective development of baseline conditions.	
Section 12 Baseline Conditions - Indigenous Peoples	The list of contextual information that may be considered should include an opportunity to develop other contextual factors that may be important for Project consideration. There is a risk that the proponent may interpret the list narrowly and Aroland First Nation would like an opportunity to develop and add additional relevant information.	Please consider adding a bullet to the contextual information list that provides an open-ended opportunity for other important contextual information: <ul style="list-style-type: none"> other contextual information and/or factors that Indigenous groups identify as valuable for consideration.
Section 12 Baseline Conditions - Indigenous Peoples	Understanding historic and current use are important sources of knowledge to inform baseline conditions. However, there should also be consideration of future goals and use and how the project may impact those long-term objectives. There are areas previously impacted by development activities that Aroland First Nation may seek to restore and reclaim. The Project may impact those long-term goals and should be considered alongside historic and current uses.	Recommend that the impact of the Project on future goals, objectives and use related to Aboriginal rights and interests be considered as part of the assessment process.
12.1 Physical and Cultural Heritage 12.2 Current Use of Lands and Resources for Traditional Use 12.3 Health, social and economic conditions. 12.4 Conditions Related to the Rights of Indigenous Peoples	Cumulative impacts of this Project on the exercise Indigenous groups Aboriginal rights and interests should be considered in the assessment of each of the baseline condition areas.	Please consider including a provision to each of the baseline condition areas that includes the description and assessment of cumulative impacts on Indigenous groups' ability to exercise their Aboriginal rights and interest as a result of this Project.
Section 14 Predicted Changes to Physical Environment		
14.2 Changes to groundwater and surface water	This section does not reference springs and spring water.	Please include within the project-specific water use assessment, any changes to springs and spring water, including flow or volume and quality.
Section 15 Effects to Valued Components – Environment		

15.1 Fish and Fish Habitat	Effects to fish and fish habitat have direct and indirect impacts on fishing by Indigenous peoples. Fishing and specific fishing locations may be valued components for Indigenous peoples.	Along with describing direct, incidental or cumulative predicted positive and/or adverse effects to fish (all developmental stages) and fish habitat, this section should also require describing direct, incidental or cumulative predicted positive and/or adverse effects to fishing by Indigenous peoples and fishing locations valued by Indigenous peoples. As a result, “Fish and Fish Habitat” becomes “Fish, Fish Habitat, and Fishing” to provide better understanding of how fishing practices, access, economic aspects, nutritional aspects, and community well-being aspects will be impacted.
15.2 Birds, migratory birds and their habitat	Effects to birds, migratory birds and their habitat have direct and indirect impacts on bird hunting by Indigenous peoples. Bird hunting and specific bird hunting locations may be valued components for Indigenous peoples.	Along with describing describe direct, incidental and cumulative predicted positive and/or adverse effects to migratory birds and non-migratory birds, including population level effects that could be caused by all project activities, this section should also require describing direct, incidental or cumulative predicted positive and/or adverse effects to bird hunting by Indigenous peoples and bird hunting locations valued by Indigenous peoples. As a result, “Birds, migratory birds and their habitat” becomes “Birds, migratory birds and their habitat, and bird hunting” to provide better understanding of how bird hunting practices, access, economic aspects, nutritional aspects, and community well-being aspects will be impacted.
15.3 Terrestrial wildlife and their habitat	Effects to terrestrial wildlife and their habitat may have direct and indirect impacts on wildlife hunting and trapping by Indigenous peoples. Wildlife hunting and trapping, and specific hunting and trapping locations may be valued components for Indigenous peoples.	Along with describing the potential direct, incidental and cumulative adverse effects to other wildlife and wildlife habitat, including population level effects that could be caused by all project activities, this section should also require describing direct, incidental or cumulative predicted positive and/or adverse effects to wildlife hunting and trapping by Indigenous peoples and wildlife hunting and trapping locations valued by Indigenous peoples. As a result, “Terrestrial wildlife and their habitat” becomes “Terrestrial wildlife, their habitat and hunting and trapping” to provide better understanding of how wildlife hunting and trapping practices, access, economic

		aspects, nutritional aspects, and community well-being aspects will be impacted.
15.4 Species at risk and their habitat	There may be species noted as “at risk” by Indigenous groups and local communities and their habitat that are not currently listed under the Species at Risk Act or provincial statutes	Please amend the TSIG to include the requirement to describe the potential direct, incidental and cumulative adverse effects of the designated project on species noted to be “at risk” by Indigenous groups
15.5 Climate Change	Indigenous peoples have a great deal of Indigenous knowledge of historic and contemporary climate change characteristics and impacts	This section should include a requirement to describe or reference Indigenous knowledge of historic and contemporary climate change characteristics and impacts, and considerations from Indigenous peoples for how climate change may impact the Project and its components during construction, operation and decommissioning
Section 17 Effects to Valued Components - Social		
17.1 Services and infrastructure	Given the likelihood of infrastructure (e.g. transmission, telecommunications, pipelines) co-location within road rights-of-way, such infrastructure should be explicitly mentioned.	Please make explicit reference to infrastructure that may be co-located within road rights-of-way – transmission, telecommunication and pipeline infrastructure.
17.4 Community Cohesion	This section should define community cohesion.	Community cohesion can be defined as the willingness of members of communities to cooperate with each other in order to survive and prosper. As such, this section should require the development of indicators of community cohesion that can then be used to describe the potential direct, incidental and cumulative adverse effects to community cohesion that could be caused by all project activities.
Section 18 Effects to Valued Components - Economic		
18.6 Overall Economic Impact	Reference to telecommunication infrastructure and services is needed.	Require describing the project’s impact and consistency with any existing local or regional plans for telecommunication services.
Section 19 Effects to Indigenous Peoples and Impacts to the Exercise of Aboriginal and Treaty rights		
19 Effects to Indigenous Peoples and Impacts to the Exercise of Aboriginal and Treaty rights	The guidelines state that “Engagement with Indigenous groups is required to inform the impact assessment and identify measures to avoid or minimize potential impacts on Indigenous peoples from the project.” Accommodation measures should also be considered in cases where impacts to Indigenous cannot be avoided and/or mitigated.	Please add the word “accommodation” to the following sentence: “Engagement with Indigenous groups is required to inform the impact assessment and identify measures to avoid or minimize <u>or accommodate</u> potential impacts on Indigenous peoples from the project.” The word accommodate should also

		be added to any other phrases throughout that mentioned avoidance and mitigation of impacts on Indigenous peoples.
19.1 Effects to Indigenous People	<p>The list of considerations that are encouraged as “best practices” must be included to fully understand the effects of the Project on Aroland First Nation and other Indigenous groups. The assessment of potential socio-economic impacts of the project should not be encouraged, but mandatory.</p>	Ensure that the factors and considerations outlined as best practices are mandatory to that the socio-economic effects of the Project on Indigenous peoples is fully contemplated.
19.1 Effects to Indigenous People	<p>The guidelines encourage proponents to include information on the:</p> <ul style="list-style-type: none"> • a description of any plans for cultural sensitivity training for non-Indigenous employees to promote a safe work environment that supports the well-being of Indigenous employees; • a description of any plans for cultural competence training for non-Indigenous employees to ensure a respectful professional relationship with Indigenous businesses. <p>In addition, inclusion of plans to address non-Indigenous employees not behaving in culturally sensitive and competent ways should be included. Proactive training is valuable, but Aroland First Nation is also interested in how the proponent will deal with employees who are not promoting a safe work place that support the well-being of Indigenous employees.</p>	<p>Recommend adding the following criteria to the list for inclusion in the assessment:</p> <ul style="list-style-type: none"> • a description of any plans to address and deal with employees that do not promote a safe work environment that supports the well-being of Indigenous employees.
19.1 Effects to Indigenous People	<p>This section provides a list of potential effects to consider, with specific reference to “interferences of the project with the following:</p> <ul style="list-style-type: none"> • access to culturally important harvesting areas or resources of importance.” <p>Interference with access is one potential concern, but increased access for non-Indigenous individuals to areas important for the exercise of Aboriginal rights and interests may also be a potential impact of the Project. These types of impacts must also be considered and added to the list.</p>	Recommend that the potential effects to consider also include the impact increased access may have on Indigenous groups ability to exercise Aboriginal rights and interests.

Section 22 Cumulative Effects Assessment		
22 Cumulative Effects Assessment	<p>The likelihood of an all-season road from Eabametoong First Nation to the junction at the Anaconda and Painter roads connection to the provincial highway network is high.</p> <ul style="list-style-type: none"> • Include the Landore Gold Mine project • Include the Greenstone Gold Mine project • Include mineral exploration and advanced exploration that can take advantage of all-season road connectivity throughout the region. 	<ul style="list-style-type: none"> • Include the potential Eabametoong First Nation all-season road to the junction at the Anaconda and Painter roads connection to the provincial highway network • Include the Landore Gold Mine project • Include the Greenstone Gold Mine project • Include mineral exploration and advanced exploration that can take advantage of all-season road connectivity throughout the region.
22 Cumulative Effects Assessment	Any cumulative effects assessment should consider the cumulative impacts of the Project on Aroland First Nation and other Indigenous groups ability to exercise their Aboriginal rights and interests.	AFN recommends that an assessment on the cumulative impacts of the Project on Aboriginal rights and interests be included in the TISG.
Section 25 Description of the Project's Contributions to Sustainability		
25 Description of the Project's Contributions to Sustainability	The Impact Statement should characterize Indigenous people's understanding of "sustainability" and "Seven Generations Teachings" and "Seven Generation Stewardship". Seven Generation Stewardship generally means thinking seven generations ahead (about 140 years into the future) and deciding whether the decisions made today will benefit, or negatively impact, children seven generations into the future	The Impact Statement should characterize Indigenous people's understanding of "sustainability" and "Seven Generations Teachings" and "Seven Generation Stewardship" and consider these perspectives on sustainability with equal weight to Western notions of sustainability.