ID #	Document	Section and Page #	Comment
FAFN-001	The Draft EA/IS	The Draft EA/IS	The Draft EA/IS proposes general Indigenous involvement in future monitoring and decision-making but does not outline, define, or resource a specific role for Indigenous Nations in long-term project governance. This generalized approach falls short of meaningful consultation and accommodation standards, and it fails to align with best practices for Indigenous participation in project oversight and environmental stewardship, particularly in a culturally and ecologically sensitive region. It also fails to explain how Indigenous Knowledge systems will be integrated into monitoring design, evaluation criteria, or adaptive decision-making. Please revise the EA/IS to include the following: 1.A commitment to the co-development of a project oversight and monitoring body with guaranteed participation for impacted Indigenous Nations. 2.Funding and support for Indigenous-led monitoring programs, including Guardian initiatives and community-based monitoring. 3.Formal decision-making input for Indigenous Nations throughout the life of the project. 4.A clear description of how Indigenous Knowledge will inform monitoring approaches, thresholds, and indicators.
FAFN-002	The Draft EA/IS	Sec. 12.1.3 pp. 920-922	The Draft EA/IS does not provide predictive hydrological modeling or analysis of changes to ice formation, freeze-thaw timing, or ice-jam related flooding risks in the Albany River system. This is a significant omission because freeze-thaw cycles and ice formation processes are critical to river dynamics, ecological health, and flood risk management. Understanding how the project may affect these processes, especially in the context of changing climate conditions, particularly under future climate change scenarios, is necessary to assess potential impacts on aquatic systems, infrastructure, and Indigenous land use. Please revise the EA/IS to include the following: 1.Predictive hydrological modeling or analysis of potential changes to ice formation, freeze-thaw cycles, and the risk of seasonal flooding along the Albany River system. 2.An assessment of these risks under both current and projected future climate scenarios.

FAFN-003	The Draft EA/IS	The Draft EA/IS	The current defined study areas do not adequately reflect the extent of potential downstream and cumulative impact, particularly along the Albany River system. For a project of this scale one that fundamentally alters access, hydrology, and ecosystem dynamics - a broader special scope is required to understand long range ecological and cultural consequences. Please revise the EAIS to: 1.extend the regional study area to include downstream zones of influence, including the Albany River and coastal ecosystem leading into James Bay. 2.Integrate Indigenous Knowledge and land use mapping to identify areas of cultural and ecological significance beyond the current study boundary. 3.Re-evaluate potential project effects using this expanded spatial lens to ensure that downstream communities and ecosystems are meaningfully assessed.
FAFN-004	The Draft EA/IS	Sec. 9.4.6.4, Table 9-30 p.669	The Draft EA/IS acknowledges historical mercury contamination in the Albany river system but it fails to assess the potential for mercury mobilization resulting from sediment disturbance, dewatering, or hydrological changes associated with road development. This omission is especially concerning given the potential health and ecological impacts for downstream Indigenous communities that rely on aquatic ecosystems for harvesting and subsistence. Please revise the EA/IS to include the following: 1.A site specific risk assessment evaluating the potential for mercury mobilization during construction and operation, particularly in areas with known or suspected contaminated sediments. 2.Mitigation measures to minimize sediment disruption in mercury-sensitive areas. 3.Monitoring protocols and contingency measures to prevent downstream mercury contamination, protect aquatic health, and ensure the safety of Indigenous harvesting practices. 4. Integration of Indigenous Knowledge and historical community observations regarding mercury impacts and vulnerable sites.

FAFN-005	The Draft EA/IS	Sec. 8.3.6.4 pp.122-128	Section 8.3.6.4 off the Draft EA/IS states that no barriers to fish movement were observed at survey crossings. However, the report does not adequately assess the long term risk to fish migration posed by the installation of culverts, bridges, and other water crossings - particularly under changing seasonal flow conditions due to climate change variability and road maintenance activities. Without robust predictive analysis, the project risks fragmentation of aquatic habitats essential to the life cycles of migratory and resident fish species. Please revise the EA/IS to include the following: 1.Detailed assessment of fish passage for each proposed crossing, including site specific hydraulic modeling and design criteria. 2.Commitment to infrastructure standards that ensure year-round habitat connectivity under both low-flow and high-flow conditions. 3.Monitoring and maintenance protocols to ensure crossing structures do not become migration barriers overtime.
FAFN-006	The Draft EA/IS	Sec. 8.3.6.4 p.125	The Draft EA/IS does not sufficiently evaluate how road construction and operations may alter key water quality parameters-such as water temperature, dissolved oxygen, and sedimentation - that are critical to fish health and habitat suitability. These parameters are particularly sensitive during spawning and overwintering periods. Please revise the EA/IS to include the following: 1.Predictive modeling of changes to water temperature, dissolved oxygen levels, and sedimentation in impacted tributaries and mainstream rivers. 2.A seasonal analysis to assess risk during biologically sensitive periods. 3.Mitigation strategies and long-term monitoring to safeguard water quality in fish-bearing waters.
FAFN-007	The Draft EA/IS	Sec. 9.4.5 pp.602, 646-647 Sec. 10.3.5 pp. 802-811	While the Draft EA/IS and Appendix K include a detailed assessment of Caribou in the Missisa range, the report concludes that the project will not result in significant adverse effects for moose. As a result, it does not provide the same level of detailed analysis for moose habitat connectivity, movement corridors, or migratory behaviors. This omission overlooks the potential for road infrastructure to disrupt moose movement patterns, which may have both ecological and harvesting implications. Please revise the EA/IS to include following: 1.A comprehensive analysis of moose movements corridors in the study area. 2.Predictive assessment of potential barrier effects from road construction and operation. 3.Identification of habitat fragmentation risks and recommended mitigations to preserve movements and access

FAFN-008	The Draft EA/IS	Sec. 9.4.5 pp. 646-647	The Draft EA/IS acknowledges that the new access road may increase hunting pressure and human activity, but it does not assist the population-level effects or propose specific mechanisms for regulating increased access. Please revise the EA/IS to include the following: 1.Risk assessment of increased hunting and poaching pressure due to new road access. 2.Concrete regulatory and enforcement measures to manage access and harvesting activities. 3.Commitment to co-develop culturally appropriate access protocols and enforcement mechanisms in collaboration with Fort Albany First Nation.
FAFN-009	The Draft EA/IS	Appendix I pp. 111- 168	Peatlands are vital ecosystems that store carbon, regulate water flow, and hold deep cultural significance for indigenous communities through their connection to traditional harvesting and land-based practices. The Draft EA/IS indicates that peatlands may be damaged by chances in surface water flow or melting permafrost resulting from road construction and related disturbances. However, it does not include detailed, location specific studies or predictive modeling to assess where and how peatland degradation may occur. Moreover, the report does not define clear ecological thresholds to identify when peatland degradation is becoming serious or reversible. Please revise the EA/IS to include the following: 1.specially explicit assessment of peatland vulnerability, including hydrological and thermal modeling to identify high-risk areas for degradation from drainage, thaw, or terminal disturbance. 2.Integration of climate change scenarios into peatland resilience modeling to support proactive design and mitigation. 3.Formal commitment to engage Fort Albany First Nation in the identification, classification, and protection of sensitive peatland areas using Indigenous Knowledge and stewardship protocols. 4.Clear thresholds or indicators of peatland degradation, and mitigation and adaptive response plan to prevent long term damage or carbon release 5. Quantification of peatland carbon storage and inclusion in the cumulative effects analysis, particularly in relation to long-term climate change impacts.

FAFN-010	The Draft EA/IS	Appendix T pp. 274-275	The Draft EA/IS acknowledges that the construction of a new access road may increase risks related to drug and alcohol availability, human trafficking, and social disruption. These risks are not isolated to individual harm-they have broader community wide impacts on safety, mental health and cultural cohesion. Indigenous women and youth are particular vulnerable to these effects, which can erode community trust, strain support services, and disrupt intergenerational relationship. However, the Draft EA/IS does not explain how these risks will be tracked over time or how affected communities will be protected if social harms intensify. The lack of a long-term prevention, response, and support strategy is a significant gap in the assessment. Please revise the EA/IS to include the following: 1.Co-developed Safety and Wellness plan with affected Indigenous Nations and neighboring communities that includes culturally relevant prevention, support services, and response protocols. 2.Community-led monitoring of social harms with indicators developed in partnership with
FAFN-011	The Draft EA/IS	Appendix T pp. 269-271	The Draft EA/IS includes that greater road access could lead to decline in traditional food harvesting and an increase in overharvesting due to easier access to hunting and fishing areas. These changes could significantly disturb cultural transmission between Elders and youth and contribute to the erosion of food sovereignty. Maintaining traditional harvesting is essential not only for food security, but also for cultural continuity, knowledge transfer, and the integration of Indigenous values and practices in land stewardship. Please revise the EA/IS to include the following: 1.Commitment to support community-based harvesting and food security programs that strengthen traditional food systems, not just rely on imported food options. 2.Formal support and funding for Indigenous-lead harvesting initiatives.
FAFN-012	The Draft EA/IS	Appendix T pp.220-226	The Draft EA/IS briefly acknowledges potential psychological impacts- such as loss of sense of place, mental health risks, and intergenerational cultural disruption - but does not meaningfully assess them. These effects are deeply tied to community identity, resilience, and long-term well-being. Psychological harms can manifest as increased anxiety, disconnection from land-based practices, and erosion of cultural continuity. Please revise EA/IS to include a substantive assessment of cumulative psychosocial effects, including: 1.Long term mental health impacts of environmental and cultural disruption. 2.Risks to cultural continuity and identity, especially for youth. 3.Mitigation measures such as land based healing initiatives mental health supports, and cultural programming co-designed with Fort Albany First Nation

FAFN-013	The Draft EA/IS	Sec. 8.3.6.7 pp.349-350	The Draft EA/IS References sacred and burial sites but does not clearly explain how these will be protected during or after construction. Sacred sites are essential to cultural survival and are protected under both Indigenous law and Canadian heritage legislation. Their desecration can cause intergenerational trauma and erode Spiritual and cultural identity. Please revise the EA/IS to include a clear commitment to protect sacred and burial sites, including the designation of no-go zones and protocols for community notification and consent prior to any work near sensitive areas.
FAFN-014	The Draft EA/IS	The Draft EA/IS	The Draft EA/IS includes monitoring and adapting but does not explain how affected Indigenous Nations can participate in real time monitoring or what role the community would play. Legacy impacts from historical hydroelectric and resource development have degraded baseline conditions, making community-led oversight essential to restore and safeguard Indigenous lands. Please revise the EA/IS to include clear mechanisms for Indigenous Nations to participate in real time monitoring, enforcement come up and adaptive management decisions, particularly through on the ground roles.
FAFN-015	The Draft EA/IS	The Draft EA/IS	The Draft EA/IS does not explain what thresholds would trigger stronger protection or adaptive actions. Clearly defined thresholds are critical to ensure automatic responses when harm occurs, helping to prevent irreversible damage to lands, water and cultural values. Please revise the EA/IS to include clearly defined indicators and thresholds that would automatically trigger operational changes or the implementation of additional safeguards when environmental or cultural impacts are observed. These thresholds should be co-developed with Indigenous communities and include Indigenous Knowledge indicators.
FAFN-016	The Draft EA/IS	Sec. 10 pp. 754-776 Sec. 6.8 p. 69 Appendix E	The Draft EA/IS does not assess what may happen if other mines-particularly those in the Ring of Fire- or new roads are developed in the region. Failing to consider foreseeable developments overlooks the cumulative landscape-scale pressure that could drastically alter ecosystems, increase access, and undermines Indigenous rights and territory stewardship. Please revise the EA/IS to include a scenario-based cumulative effects assessment that incorporates foreseeable projects such as other Ring of Fire mines, and access roads, and evaluates their combined impact with the Marten Falls Community Access Road.

FAFN-017	The Draft EA/IS	Sec.10 pp.771 -773	The Draft EA/IS excludes key foreseeable Ring of Fire mining projects from its cumulative effects assessment. Table 10-1 omits major mining projects- such as the Blackbird, Big Daddy, Black Label, and Black Thor mines- despite their public identification by mining companies. The rationale provided that- these are “deposits and not active projects” - fails to reflect their "reasonably foreseeable" status, as defined by Indigenous knowledge holders and planning standards. This exclusion represents a serious flaw in the scoping of cumulative effects and illustrates the broader issue of project splitting. By artificially narrowing the scope of analysis, the EA/IS fails to account for the full impact of opening the Ring of Fire and adjacent James Bay Lowlands to industrial development. Please revise the EA/IS to retain these mining projects in the cumulative effects assessment, in accordance with regulatory guidelines on "reasonably foreseeable” developments.
FAFN-018	The Draft EA/IS	Section 7.2.3 pp.87-94	The Draft EA/IS does not adequately assess the environmental and cultural impacts of aggregate extraction and construction waste management, despite identifying over 40 potential aggregate and borrow sites. These activities, involving drilling, blasting, crushing, dewatering, and stockpiling of materials, are expected to operate throughout the construction and operational phases of the road. Associated infrastructure, including concrete batch plants, access roads to pits, and waste disposal areas, is not fully scoped into the effects analysis. These activities may also result in noise, light, and chemical pollution that affects Indigenous harvesting practices and local ecosystems. This omission is unacceptable given the scale, intensity, and duration of aggregate extraction operations. Please revise the EA/IS to include all aggregate-related facilities, dewatering activities, and construction waste infrastructure in the cumulative effects analysis. A full assessment of long-term impacts, ecological thresholds, and mitigation plans is required, particularly for sensitive peatland and surface water areas.
FAFN-019	The Draft EA/IS	Sec. 10 pp. 754-776 Sec. 6.8 p. 69 Appendix E	The Draft EA/IS acknowledges past hydroelectric and forestry development, but it does not assess their ongoing ecological and cultural impacts. Legacy impacts matter because they compound new pressures and shape the degraded environmental and cultural baselines against which current project impacts should be measured. Please revise the EA/IS to include an analysis of legacy hydroelectric and forestry development impacts as part of the cumulative effects framework.

FAFN-020	The Draft EA/IS	Sec. 10 pp. 754-776 Sec. 6.8 p. 69 Appendix E	The Draft EA/IS does not consider how the road may induce new development - such as additional mining, logging, or increased recreational access - beyond its immediate footprint. Assessing induced development is critical because it can accelerate land-use change and contribute to cumulative cultural loss, habitat fragmentation, and long-term environmental degradation. Please revise the EA/IS to include an assessment of potential induced development scenarios resulting from improved access, and their implications for environmental and cultural sustainability.
FAFN-021	The Draft EA/IS	Sec. 10 pp. 754-776 Sec. 6.8 p. 69 Appendix E	The cumulative effects assessment is conducted in isolation and is not integrated into any broader regional planning or strategic assessment framework. Without the regional lens, the assessment fails to account for the interconnectedness of development pressures. A broader approach ensures consistent standards, cross-jurisdictional planning, and holistic protection of Indigenous rights and ecosystems. Please revise the EA/IS to include the cumulative effect assessment within an established or emerging regional strategic assessment framework, such as the Ring of Fire Regional Assessment.
FAFN-022	The Draft EA/IS	The Draft EA/IS	The draft EA/IS does not consider how project related habitat alteration and landscape change could contribute to increased abundance of certain insect populations and the resulting ecological impacts. While the EA/IS assess is negative effects on pollinating insects from construction and operation activities, it does not evaluate the potential for insect overpopulation to cause broader environmental consequences- such as ecological imbalance, vegetation stress, or shifts in predator prey dynamics. These effects could be particularly relevant in disturbed or reclaimed areas, where conditions may Favor population booms of opportunistic species. The EA/IS also does not include Indigenous Knowledge or local observations of previous insect population increases following landscape changes. These represents a gap in the current impact assessment framework. Indigenous knowledge and local ecological observations may provide insight into past experiences with insect population changes and related environmental impacts, especially following habitat disturbance. We recommend that the EAIS be revised to include an analysts of potential environmental consequences from increased insect abundance, including culturally or ecologically significant feedback effects, to ensure the long term integrity of affected ecosystems is properly evaluated.