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Re: Constance Lake First Nation Comments on Marten Falls Community Access Road Draft Impact Assessment Report and Conditions of Approval

Please find attached Constance Lake First Nation's comment submission on the draft Marten Falls Community Access Road (MFCAR) Impact Assessment Report and Conditions of Approval that was released for review in June 2026. Constance Lake First Nation (CLFN)'s participation in this process has included a technical review of the draft and final EA/IS documentation, analysis of proponent and regulator responses to CLFN review and comments, a review of the draft Impact Assessment Report, analysis of the conditions of approval and extensive community engagement activities to capture community feedback related to the project. The attached submission represents the outcomes of these activities and outlines the outstanding concerns that CLFN has regarding the project.

While our Nation has concerns about the environmental impacts of the MFCAR, CLFN is generally supportive of Marten Falls First Nation (MFFN; the Proponent) asserting their sovereignty by establishing road access to their community. We continue to recognize the importance of MFFN's efforts to secure economic opportunities, improve infrastructure, and better the lives of their members, and we respect their right to pursue development on their terms.

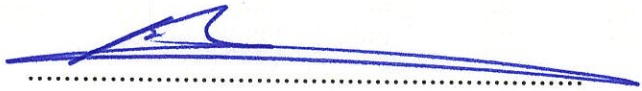
Our support does not diminish the fact that the MFCAR is a major infrastructure undertaking in a region that holds cultural and environmental significance to CLFN members. The road's footprint and associated activities carry the potential to disrupt waterways, fragment wildlife habitat, and disturb sites of archaeological and cultural importance. While we understand that the EA/IS process is specific to the MFCAR project, it must be recognized that this project, if approved, will increase pressure for development

and access to resources. With this comes risk and uncertainties. While Canada's proposed conditions have the potential to strengthen monitoring and adaptive management of the project, it is CLFN's perspective that this approach shifts the focus from impact avoidance to impact management after approval. It is critical that all parties, the Proponent, Ontario and Canada work proactively to mitigate the environmental and cultural risks. As such, CLFN's comments attached recommend amendments to the draft conditions of approval to strengthen the effectiveness of the proposed conditions.

CLFN has actively participated in the Environmental and Impact Assessment process in good faith with the intention of sharing our knowledge, ideas and concerns. We have expressed the desire to meet directly with Marten Falls members to discuss the project and have initiated this conversation and await action from MFFN to advance this request. CLFN remains committed to constructive dialogue and regional collaboration. We are prepared to work alongside other Nations, governments, and proponents to ensure that development in our homelands proceeds in a way that is respectful, balanced, and aligned with our values, rights, and responsibilities to the land.

Respectfully yours,

On behalf of Constance Lake First Nation Chief & Council



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Comments on Marten Falls Community Access Road Impact Assessment Report and Conditions of Approval

July 6, 2026

Submitted by: Constance Lake First Nation



Regulatory and Procedural Context

The Marten Falls First Nation Community Access Road (MFCAR) is a proposed all-season road intended to connect the remote community of Marten Falls First Nation (MFFN; the Proponent) to Ontario's provincial highway network. Located in the James Bay Lowlands region of northern Ontario, MFFN is currently accessible only by air and a seasonal winter road. The planned access road would span approximately 184 kilometers from the northern terminus of Painter Lake Road, north of Aroland and Nakina, to the MFFN community at the confluence of the Albany and Ogoki Rivers. The MFCAR is located on the Homelands of Constance Lake First Nation (CLFN), where we have long maintained cultural ties and exercised our rights.

As part of our engagement on the MFCAR, CLFN submitted comments and recommendations on the Environmental Assessment /Impact Statement (EA/IS) to the Proponent and to Provincial and Federal regulators. Responses were provided in writing by the Proponent and the Ontario Ministry of Environment, Conservation and Parks (MECP) in March 2026 which we subsequently responded to on April 9, 2026. The Impact Assessment Agency of Canada (IAAC) provided responses to CLFN's comments on the EA/IS comments on May 21, 2026, shortly before releasing the draft Conditions of Approval and draft Impact Assessment (IA) Report for the Project. MECP have concluded that the Provincial Environmental Assessment (EA) meets the requirements of the Environmental Assessment Act and recommended standard conditions of approval.

CLFN has prepared this submission to address the extent to which the IAAC-drafted IA Report and proposed Conditions of Approval meaningfully address key concerns, including Indigenous participation and recognition, fish and wildlife, current use, cultural values, cumulative effects, and follow-up monitoring. Our analysis of the Federal IA Report and Conditions of Approval considers the Proponent commitments made by the Proponent through the EA/IS, as well as the conditions imposed by MECP and responses from IAAC on our EA/IS comments.

CLFN's Key Concerns with the Draft Federal Conditions

CLFN remains broadly supportive of MFFN's desire to develop the MFCAR as a means of providing year-round access to their reserve community. However, through our review of the draft IA conditions we have identified a number of issues where we raised concerns that have not been addressed by the Proponent. Across disciplines, the Proponent, MECP and IAAC have responded the vast majority of our concerns as:

- Outside the scope of the Environmental Assessment / Impact Assessment (EA/IA),
- Deferred to future design or permitting, or
- Assigned to a future "ultimate owner/operator."

- Acknowledgement of request for a Nation-to-Nation meeting without a commitment to undertake it

Overarching Gaps and Reliance on Deferral

While IAAC's proposed conditions have the potential to strengthen monitoring and adaptive management, they largely rely on post-approval processes and do not require many of the substantive measures requested by CLFN prior to construction. In several instances, concerns were considered addressed because the Proponent committed to undertake additional investigations, develop future plans (such as biodiversity offsetting, vegetation management, restoration, monitoring, emergency response, and access management plans), or provide opportunities for CLFN to review future documentation. These concerns were not necessarily resolved through the EA/IA process itself and remain dependent on the quality of future work, the extent to which CLFN's concerns are incorporated, and whether meaningful opportunities for CLFN participation are provided during development and implementation.

This results in several overarching gaps. Many of the concerns raised by CLFN have not been resolved through the EA/IA process and instead have been treated as outside the scope of the assessment, deferred to future design and permitting, or left to future governments, regulators, owners and operators to address.

As a result, important issues related to cumulative effects, access management, community safety, environmental monitoring, and long-term governance remain unresolved. While the proposed federal conditions strengthen consultation and follow-up monitoring requirements, they do not establish many of the specific measures requested by CLFN, nor do they provide clear roles for CLFN in the development and implementation of future plans and programs.

While opportunities for participation are referenced, the proposed conditions do not establish a clear or enforceable role for CLFN in leading or implementing monitoring. This includes the absence of commitments to support Indigenous Guardian or community-based monitoring programs, which are increasingly recognized as an effective mechanism for long-term, Indigenous-led environmental stewardship. While the MECP has concluded that the EA/IS provides sufficient information to support decision-making, this is based on their narrow interpretation of the scope of the EA/IA, rather than resolution of the substantive issues raised by CLFN. The continued reliance on follow-up monitoring and future planning reinforces the pattern identified above: key risks and uncertainties are acknowledged but deferred.

From CLFN's perspective, this approach shifts the focus from impact avoidance to impact management after approval. Given CLFN's location downstream of the Project, the current approach creates increased uncertainty regarding potential effects on water quality, flow regimes and access to waterways relied upon for subsistence, travel, and cultural practices. These effects may not be fully understood or mitigated prior to construction and could have cumulative, long-term implications for the exercise of CLFN's rights. While monitoring and adaptive management are important, they do not replace the need for clearly defined mitigation measures, meaningful Indigenous participation, and greater certainty regarding how key risks will be managed prior to

construction.

To support the analysis that follows, **Table 2** summarizes issues that CLFN considers to have been at least partially addressed through MECP, IAAC and the Proponent's responses, while **Table 3** identifies key concerns that remain unresolved in light of those responses and the draft federal conditions. Together, these tables provide the context for CLFN's proposed amendments to the draft conditions and the accommodation measures set out below.

Proposed edits to the Draft IA Conditions

These proposed amendments respond directly to the unresolved issues summarized in Table 3, while also building on commitments and clarifications reflected in Table 2. Some of these edits have been proposed to ensure consistency between the Webequie Supply Road conditions and the conditions for this Project to simplify implementation and interpretation.

CLFN recommends the following amendments to the draft conditions of approval (new language added in bold):

1. Amend Condition 2.2.1 to state: “*provide a written notice of the opportunity for the parties being consulted to present their views and information on the subject matter of the consultation and commensurate capacity support to meaningfully participate;*”

CLFN has requested that baseline data gaps for water quality, fish and fish habitat be filled prior to ground disturbance, and that aquatic monitoring needs to continue for the life of the Project:

2. Amend Condition 3.1.1 to state “*monitor, beginning during construction and **continuing for the life of the Project**, water quality parameters in groundwater and surface water, including total suspended solids, acidity, electrical conductivity, sulphates, nitrates, and heavy metals and metalloids, including aluminum, mercury, arsenic, copper, iron, lead, manganese, nickel, and zinc, **substrate composition, sediment deposition, water temperature, fish passage, and fish use of watercourses and crossings** in waters frequented by fish;*”
3. Add a new subcondition under 2.4 that reads: “*a list of locations where baseline work was not completed during the environmental assessment phase and where baseline work will be completed prior to ground disturbance, with a focus on water crossings and Lake Sturgeon (Acipenser fulvescens);*”
4. Add a new sub-condition under Condition 3.1 that reads: “*monitor, beginning during construction and continuing for the life of the Project, the adverse effects of the Project on fish species of importance, including but not limited to Lake Sturgeon (Acipenser fulvescens)*”
5. Amend Condition 3.1.3 to state: “***provide opportunities for Indigenous groups to participate in monitoring activities, including through the establishment and long-term support of Indigenous Guardian programs, and make the monitoring results available to Indigenous groups.***”

CLFN requests additional protections for birds not covered under the Migratory Birds Act and nesting habitats:

6. Add Condition and subconditions after 4.2, with subsequent conditions renumbered accordingly, that reads: “**4.x The Proponent shall not undertake any activity associated with the Designated Project that could harm the nesting of birds other than migratory birds and that are species at risk on the Marten Falls First Nation**

reserve, to avoid the destruction of nests, eggs or nestlings. In doing so, the Proponent shall:

- a. ***“4.x.1 determine, under the direction of a qualified individual, the dates of relevant nesting periods for bird species other than migratory birds for any year during which these activities are carried out. The Proponent shall inform the Agency of these dates, including a justification, before carrying out these activities;***
 - b. ***“4.x.2 not undertake or continue any activity likely to harm nesting within the nesting periods determined under condition 4.3.1, unless this is not technically or economically feasible; and”***
 - c. ***“4.x.3 provide a justification to the Agency if it is not technically feasible to carry out any activity that could harm nesting outside the nesting periods determined in accordance with condition 4.3.1, and develop and implement additional mitigation measures to avoid adverse effects on birds during nesting. The Proponent shall provide these measures to the Agency before implementing them.”***
7. Amend Condition 4.4 to state: ***“The Proponent shall develop, prior to establishing pits and quarries, under the direction of a qualified individual **and in consultation with Indigenous groups**, and implement during all phases of the Designated Project, measures to prevent bank swallow (*Riparia riparia*) from nesting in pits and quarries, taking into account Environment and Climate Change Canada’s document Bank Swallow (*Riparia riparia*): in sandpits and quarries.”***

CLFN has identified the need to address social impacts and the risks of missing and murdered Indigenous women and girls that arises from construction activities, temporary work camps and from new roads:

8. Add a Condition before 5.1, with subsequent conditions renumbered accordingly, that reads: ***“The Proponent shall develop and implement, within four months of the start of construction, a Community Readiness Plan to mitigate adverse effects on the social conditions of Indigenous peoples. As part of the implementation of the Community Readiness Plan, the Proponent shall make available, during construction, on-duty community liaison officers for community members to contact for conflict resolution.”***
9. Amend Condition 5.1.1 to state : ***“implement a workplace anti-harassment, anti-bullying, anti-discrimination and anti-violence policy that incorporates gender-appropriate, gender-specific, and culturally appropriate policies and processes, including sexual harassment and assault counselling as well as confidential and culturally sensitive care **with special attention for the risks of Missing and Murdered Indigenous Women and Girls**;***

CLFN requests stronger accountability and complaint response measures:

10. Amend Condition 6.1.1 to state: ***“address complaints within **24 hours** of receipt”***

CLFN requests specific recognition of certain species of importance for ongoing monitoring:

11. Amend Condition 6.9.1 to state: *“monitor adverse effects to the population, habitat and predator/prey dynamics of wildlife of importance to Indigenous groups **including but not limited to wolverine (Gulo gulo), caribou (Rangifer tarandus caribou) and moose (Alces alces)**; and”*

CLFN requests additional opportunities for Indigenous knowledge holders and cultural monitors to support the protection of cultural and heritage resources:

12. Add a Condition after 7.1, with subsequent conditions renumbered accordingly, that reads: *“The Proponent shall, prior to construction, offer opportunities to Indigenous groups for spiritual monitors trained by Elders to provide advice on areas to be avoided during construction to mitigate adverse effects on structures, sites or things of historical, archaeological, or paleontological significance. The Proponent shall, where possible, designate these areas as no-work zones. If not possible, the Proponent shall provide the reasons to the Agency and Indigenous groups.”*

CLFN also expects to be added as one of the Nations listed in Table 5 of the draft Impact Assessment Report.

Finally, CLFN requests that the Proponent and Crown clarify how engineering and design risks will be mitigated given that the road is now being designed, engineered, procured, and constructed on overlapping timelines under Ontario’s revised construction schedule.

These targeted refinements would strengthen the effectiveness of the proposed conditions by ensuring that key uncertainties are addressed, CLFN participation is meaningful and enforceable, and monitoring frameworks are capable of detecting and responding to project-related effects.

CLFN-Specific Accommodation Measures

CLFN requests that the Federal and/or Provincial Crown governments offer the following accommodation measures to CLFN for the impacts of the MFCAR to our ability to exercise our rights and interests that cannot be mitigated by the MFCAR Project:

1. **A commitment to fund the costs for a near-term road development Project that our Nation wishes to advance as the Proponent** (similar to the structure by which the Crown has worked with MFFN on the MFCAR and with WFN on WSR). This commitment would take the form of a binding Memorandum of Understanding that will be followed by a more detailed commitment to work with our Nation on the Project.
2. **A commitment to provide funding to establish and operate a CLFN-led blastomyces and blastomycosis sampling and research hub** in the community as recommended by the jury in the Coroner's inquest into the deaths of five CLFN members following an outbreak of the lung disease.
3. **Funding for CLFN-led research and monitoring regarding the impacts of steel culverts and associated road infrastructure on Brook Trout** (Speckled Trout), fish passage, aquatic habitat connectivity, and harvesting conditions within CLFN Territory, including support for a CLFN Guardian program to support ongoing monitoring and stewardship of our lands and waters.
4. **A commitment to provide funding for community infrastructure initiatives** required to address the cumulative social and economic pressures associated with increased industrial access and regional development linked to the MFCAR and Ring of Fire corridor.

Tables 2 and 3, provided below, summarize the issues CLFN considers addressed and those that remain unresolved.

Community Engagement

CLFN staff, along with assistance from Four Rivers Environmental Services (Four Rivers) and Tamarack Environmental Associates (Tamarack), facilitated community engagement sessions to gather input and perspectives from on the draft federal IA conditions and IA Report for the MFCAR Project. Engagement sessions were held with land users, knowledge holders and cultural/spiritual practitioners. This included women, youth, elders and the general membership. These engagement sessions occurred on June 26th, June 29th and June 30th, 2026. The findings of this submission have been driven by the input and perspectives provided by CLFN members during all of the community engagement sessions shown in Table 1.

Summary of Engagement Activities

All sessions included a short presentation by CLFN, Four Rivers and Tamarack, followed by an extended discussion period where members asked questions and shared their perspectives on the Project.

Table 1: Summary of community engagement sessions on MFCAR draft IA Report and Conditions of Approval

Date and Time	Location	Approximate # of CLFN Attendees
June 29, 2026 1pm-5pm	CLFN Community Hall	18
June 30, 2026 9am-11pm	CLFN Health Centre	14
Total Member Engagement Count		32

Summary of Community Input

CLFN staff, Four Rivers and Tamarack all took extensive notes during all of the community engagement sessions on the draft IA Report and IA Conditions. The following list presents a summary of the comments raised by membership during these engagement sessions:

- Concerns regarding the cumulative effects of the MFCAR enabling broader Ring of Fire development, including increased mining, forestry, industrial activity, and access into the region. Community members emphasized that their primary concern is not the road itself, but the long-term impacts that future development may have on CLFN lands, waters, rights, and future generations.
- Requests for stronger environmental protection measures and long-term monitoring, including life-of-project water quality monitoring, CLFN-led participation in monitoring programs, transparent reporting on downstream effects, protection of fish and aquatic habitat, and the use of best-available practices for water crossings and other sensitive environmental features.
- Requests for ongoing transparency, accountability, and engagement throughout permitting, construction, and operations, including clear information on how environmental protections will be implemented, how community concerns will be addressed, and how CLFN will remain informed and involved after environmental assessment approvals have been issued.
- Concerns regarding the effects of increased access and future development on CLFN lands, resources, and traditional activities, including impacts to medicinal plants, harvesting areas, culturally important places, and the ability of future generations to continue using the land.

- Requests for enhanced community safety measures to address the risks associated with increased regional access, including funding for policing, community safety initiatives, regional safety planning, and programs aimed at addressing drug trafficking, substance abuse, and pressures on vulnerable community members.
- Concerns that CLFN continues to bear environmental, cultural, and social risks from regional development while receiving insufficient benefits and accommodation. Community members called for accommodation measures that support community infrastructure, recreation, reserve beautification, housing, cultural programming, education, training, and long-term capacity-building opportunities.
- Concerns regarding Indigenous governance, decision-making, and the adequacy of consultation and accommodation processes. Community members expressed frustration that First Nations' concerns are not meaningfully incorporated into decision-making and emphasized the need for consent-based approaches that respect Indigenous laws, governance processes, and Treaty rights.

Summary and Recommendations

CLFN has consulted our membership extensively and has engaged in the regulatory process for the MFCAR Project in good faith with IAAC, MECP and the Proponent. We request that our amendments to the conditions of approval be incorporated into the decision statement, and request that Ontario and Canada meet with our Nation to discuss the requested accommodation measures for this Project and for other near-term Projects that affect our ability to exercise our rights.

Table 2. Summary of Addressed Concerns, Based on Proponent, IAAC and MECP's Responses to CLFN Comments and Recommendations on the EA/IS

Subject	CLFN ID	Details
Project Scope, Future Development, and Ring of Fire Separation	1, 78	MECP acknowledged that CLFN's support for the MFCAR is limited to its role as a community access road and does not imply support for future Ring of Fire developments. The Proponent also clarified that future industrial traffic, mine development, and associated environmental effects would be assessed through separate future regulatory and environmental assessment processes. IAAC further confirmed that cumulative effects and impacts on Indigenous rights will be considered in the federal impact assessment process and reflected in the draft Impact Assessment Report and potential conditions, however CLFN has additional comments on where IAAC's conditions are unsatisfactory.
Route Selection, Engineering Considerations, and Assessment Transparency	4A, 17,	The Proponent provided additional information regarding route selection methodology, engineering considerations, route evaluation metrics, and the rationale for the preferred route. Clarifications were also provided regarding assessment tables and project-effect pathways to improve transparency and interpretation of findings.
Aquatic Baseline Studies, Fish Habitat Characterization, and Benthic Assessment Methods	16, 18, 19, 24	The Proponent provided additional information regarding fish habitat, fish community, spawning habitat, and benthic invertebrate investigations and committed to additional pre-construction surveys where required.
Aquatic Invasive Species Assessment and Prevention Measures	23 A/C	The Proponent assessed aquatic invasive species introduction pathways and associated ecological risks as part of the EA/IS and committed to sharing future environmental protection planning documents with CLFN.
Stockpile Setback, Sediment Control and Watercourse Protection	25, 51	The Proponent strengthened commitments regarding stockpile setbacks from watercourses, erosion and sediment control measures, and the option for CLFN to review the geochemical verification reports.
Wolverine Effects Assessment	31 A-B, 33, 34A-C,	The Proponent clarified the assessment of wolverine mortality, increased public access, cumulative effects, and climate change impacts. The EA/IS was updated to correct the significance determination for cumulative effects on wolverine,

		incorporate additional discussion of regional warming trends, snowpack loss, denning habitat, and reproductive success.
Caribou Cumulative Effects	36, 37	The Proponent clarified the methodology used to determine reasonably foreseeable developments and confirmed that climate change and wildfire were considered in the cumulative effects assessment. The EA/IS concludes that the combined cumulative effects of the Project, other developments, forest harvesting, and climate change result in significant adverse effects on caribou. IAAC also confirmed that its federal cumulative effects assessment will consider residual adverse federal effects, Indigenous Knowledge, comments from Indigenous communities, and impacts on Indigenous rights through the draft Impact Assessment Report and potential conditions.
Moose Effects Assessment	38, 39 40,	The Proponent clarified the treatment of future Ring of Fire developments in the cumulative effects assessment and revised the EA/IS to precautionarily conclude that increased public access could result in significant effects on moose. The Proponent also committed to developing a Moose Access and Monitoring Plan, including long-term monitoring of moose populations, harvest pressure, moose-vehicle collisions and access-related effects.
Reptile and Amphibian Road Mortality	45	The Proponent committed to incorporating wildlife crossing structures, exclusion fencing, monitoring programs, signage, and adaptive management measures to reduce reptile and amphibian mortality associated with road use.
Riparian Vegetation Protection and Black Ash / Emerald Ash Borer Mitigation	28B, 29A-B,	The Proponent committed to limiting vegetation clearing within 30 m of waterbodies to the extent possible and acknowledged the cultural significance of Black Ash. The Final EA/IS was also updated to include Emerald Ash Borer prevention and long-term surveillance measures.
Aggregate Sources, Geotechnical Investigations, and Groundwater Characterization	53, 54	The Proponent provided additional information on aggregate sourcing, geotechnical investigations, and groundwater quality. Aggregate inventories will be completed during detailed design, and the Proponent clarified the nature of groundwater exceedances and proposed monitoring and permitting requirements.
Spill Prevention, Emergency Response, and Environmental Protection Measures	57A, 58, 59	The Proponent committed to developing spill prevention, emergency response, and environmental protection measures, including a Spill Prevention and Emergency Response Plan during detailed design.

Winter Road Maintenance and De-Icing	60	The Proponent confirmed that sand rather than road salt would be used for winter road maintenance.
Permafrost Management, Terrain Stability, and Climate Adaptation	61, 79, 80, 81	The Proponent committed to developing detailed permafrost management measures and incorporating climate adaptation considerations into project planning.
Peatland, Wetland, Vegetation, Fragmentation, and Edge Effects	63, 64, 65, 66, 67,	The Proponent provided additional information regarding peatland significance determinations, hydrological effects, mitigation measures, peatland carbon impacts, and edge effects. The EA/IS was revised to classify certain groundwater-related effects on peatlands as significant and to include additional monitoring and technical information.
Air Quality Assessment and Indigenous Knowledge	69, 74	The Proponent clarified the air quality assessment methodology and confirmed opportunities for CLFN traditional land use and Indigenous Knowledge information to be incorporated into future air quality and receptor assessments

Table 3. Summary of Unaddressed Concerns, Based on Proponent, IAAC and MECP's Responses to CLFN Comments and Recommendations and the draft federal Conditions of Approval

Subject	CLFN ID	Rationale
Bill 5, permitting, and regulatory standards	2	No commitment to uphold existing permitting standards if exemptions become available.
Independent oversight and Crown Accountability	3	No independent oversight, joint governance process, or formal mechanism to address concerns regarding Ontario's dual role as project funder and regulator was established.
Engineering transparency, constructability, and cost information	4B-C, 5, 52	Cost information, constructability concerns, procurement timing, and multi-point construction impacts remain unclear. IAAC's response addressed only the federal commitment to complete its assessment in a timely manner and did not provide substantive information on engineering feasibility, construction sequencing, cost overruns, or how overlapping design, procurement, and construction schedules may affect environmental risk.
Regional Assessment and Ring of Fire cumulative effects	7, 56	MECP and the Proponent confirmed that MFCAR approvals will proceed independently of the Ring of Fire Regional Assessment and that future developments will be assessed through separate regulatory processes. IAAC indicated that cumulative effects and impacts on Indigenous rights will be considered in the federal draft Impact Assessment Report and potential conditions. However, CLFN's broader concerns regarding coordinated regional planning, induced development, and a binding framework for managing cumulative effects across the broader Ring of Fire region remain unresolved.
Nation-to-Nation Meeting Requests	8, 12, 13	MFFN has been notified of CLFN's request to meet, but the meetings have not occurred. Issues around MFFN internal decision-making, Highway 11 lessons learned, and access control remain to be discussed.
Road Monitoring and Dumping Prevention	9	Requests for access controls, dumping prevention measures, enforcement mechanisms, and Indigenous oversight were deferred to future ownership, operational, or management decisions and were not addressed through enforceable commitments.
Capacity Funding and Participation	11	Conditions require discussion of participation resources for follow-up programs, but no broader capacity funding commitment is provided for all project phases.

Indigenous Participation, Advisory Committees, and Governance	6, 23D, 27, 43, 44, 47, 48, 73	Federal conditions improve consultation requirements and provide opportunities for Indigenous groups to comment on follow-up programs and potential conditions. However, there are still no commitments guaranteeing CLFN participation in advisory committees, monitoring program design, implementation, regional governance bodies, or decision-making processes. Several requests for Indigenous-led committees, working groups, and governance mechanisms were declined because they were not considered regulatory requirements or were deferred to future planning phases.
Remote road safety, emergency preparedness, and climate resilience	14, 82, 83	While some road safety features are included, requests for survival stations, emergency communications, evacuation planning, and wildfire resilience planning were not adopted. Several concerns were dismissed as outside the scope of the EA/IS or not regulatory requirements.
Aquatic monitoring, sediment control, and crossing design review	15, 20, 21, 22	Federal Conditions require water quality follow-up, but CLFN's specific requests for rainfall-event monitoring and review of ESC plans, and bridge and culvert designs remain only partly addressed.
Water and Aquatic Effects Significance	10, 57B	The Proponent did not revise aquatic significance conclusions or assess the likelihood and significance of a major spill at a water crossing over the life of the Project. This is of particular concern given CLFN's downstream location, where potential contaminant transport and changes in flow regimes will result in cumulative effects over time.
Watercourse setbacks for temporary infrastructure	26, 62	The Proponent continues to maintain a 30 meter setback and did not adopt CLFN's requested 100 meter buffer for construction, staging areas, camps and stockpiles.
Environmental Management, Restoration, Offset Planning, and Indigenous Participation	23B, 28A, 28C, 29C, 30, 41, 42, 68	The Proponent committed to developing future environmental management, restoration, offsetting, invasive species, vegetation management, and peatland restoration monitoring plans.. However, many of these commitments are deferred to future planning stages, and CLFN's requested role in reviewing, developing, or participating in the implementation and oversight of these plans remains unresolved or partially addressed.

Wildlife Mitigation, Monitoring, and Habitat Assessment	31C, 32, 34D, 35, 46	While the Proponent committed to future monitoring and adaptive management programs, several requested measures were not adopted, including trap-free buffer zones, mortality thresholds, climate-sensitive monitoring commitments, enhanced beaver management measures, and revised habitat disturbance calculations, and targeted turtle surveys. Many details were deferred to future monitoring programs, detailed design and planning.
Upstream Water Management Infrastructure and Crossing Design Risks	49, 50	CLFN requested additional assessment of hydrological variability, water management influences, crossing design tolerances, construction risks, and cumulative effects at the Ogoki and Albany River crossings. The Proponent relied on limited available information and deferred many of these considerations to detailed design and future planning.
Indigenous Knowledge, Rights, and Significance Determinations	55	CLFN disagrees with the assessment methodology used to evaluate residual and cumulative effects, including how significance is determined and how Indigenous Knowledge and impacts to rights are considered. IAAC subsequently advised that it has consulted Indigenous communities on potential impacts, circulated community-specific summaries, and will seek comments on the draft Impact Assessment Report and potential conditions. While this provides a federal process for further input, it does not resolve CLFN's underlying concerns with the methodology or how significance and rights impacts have been characterized to date.
Air quality monitoring, contaminant assessment, and combustion emissions	70, 71, 72, 75, 76, 77	Federal conditions require air quality monitoring, reporting, adaptive management, and consultation with Indigenous groups on follow-up programs. However, CLFN's requests for additional contaminant assessment, human health risk evaluation, ambient air quality monitoring, community-led monitoring, broader participation in monitoring design, and restrictions on open burning were not fully adopted. Several details remain deferred to future monitoring and management plans.
Climate adaptation, sustainability, and long-term resilience	84, 85, 86, 87, 88	CLFN requested additional climate risk assessment, adaptive management planning, sustainability monitoring, climate performance indicators, alignment with broader climate and sustainability commitments, and consideration of impacts on neighbouring First Nations. The Proponent generally responded that these matters were outside the scope of the EA/IS, not regulatory requirements, or would be addressed through other processes.