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To: Marten Falls Community Access Road Project
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Re: Ginoogaming First Nation Comments on the Marten Falls Community Access Road Draft Impact Assessment Report and Conditions of Approval

I'm writing to express Ginoogaming First Nation's serious concerns about the Marten Falls Community Access Road Project (MFCAR; the Project). GFN sees the MFCAR Project holistically and recognizes its clear intention to access mineral resources in the Ring of Fire as stated frequently by senior public officials. As we have consistently stated verbally and on the written record, **GFN does not support development related to the Ring of Fire without our consent. We will only provide our consent if we secure accommodation measures that are commensurate with the scale and severity of the anticipated impacts to GFN's Treaty and Aboriginal rights and interests from the development of the entire Ring of Fire road network and associated mining development. We insist that these accommodation discussions commence immediately.** Our Nation will consider all options to ensure that our Treaty and Aboriginal rights and interests are honoured by the Crown.

GFN homelands extend throughout the entirety of the RoF road network. Our people have lived in this region since time immemorial. GFN citizens exercise their rights, have Tazhiikaywinin, conduct ceremony, harvest food and medicines, and care for sacred sites along the corridor of the network. All will suffer severe, perhaps irreversible impacts should the road network proceed.

The IA Report and draft Conditions of Approval acknowledge that the Project will enable broader development, cause adverse impacts to GFN's rights, and contribute to significant regional cumulative impacts. Despite the obvious and severe impacts to our Treaty and Aboriginal rights and interests from the MFCAR, the Crown has made an ultimate determination that the impacts to our Nation will be very limited and that the Project is justifiable based on the proposed mitigations. Given the utter failure of the

Crown and the Proponent to provide the required GFN-specific accommodations, we find this determination by IAAC to be insulting and fundamentally flawed.

Ginoogaming has prepared the attached submission on the Draft Impact Assessment Report and Conditions of Approval to ensure that our position on the MFCAR Project is clearly and accurately represented on the public record. The IA Report dramatically understates the impacts to our Nation's rights and interests from the Project, both residually and cumulatively. Furthermore, the fact that IAAC has described the Crown and Proponent proposed mitigation measures as sufficient for the purposes of approving the Project demonstrates that the Crown has yet again failed to uphold its responsibilities as a Treaty partner with our Nation.

Our Nation is deeply concerned and frustrated by the fact that the Impact Assessment process is utterly failing to capture the true impacts from the RoF road network and impacts to our Treaty and Aboriginal rights and interests. **Ginoogaming First Nation cannot allow the Crown's failure to honour and respect our rights to pass unnoticed. We insist on commencing bilateral negotiations immediately.**

Miigwetch,



Chief Sheri Taylor, Ginoogaming First Nation

On behalf of Ginoogaming First Nation Chief & Council

cc. Hon. Todd McCarthy, MECP (minister.mecp@ontario.ca)
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Marten Falls Community Access Road

Impact Assessment Report and Conditions of Approval

Technical Review

July 6, 2026

Submitted by Ginoogaming First Nation



Introduction

Ginoogaming First Nation (GFN) is a First Nation having the capacity of a self-determining Indigenous People and a band within the meaning of the *Indian Act*, R.S.C. 1985, c. I-5 as represented by its Chief and Council and a signatory of Treaty No. 9. Our Ancestral Homelands, our Tazhiikaaywinin span a vast area north of Lake Superior, including a large portion of the proposed route of the Marten Falls Community Access Road (MFCAR; the Project).

The MFCAR is a proposed all-season road intended to connect Marten Falls First Nation (MFFN; the Proponent) to the provincial highway network. The Project will traverse lands and waters that GFN relies on for the exercise of our Aboriginal and Treaty rights, including hunting, fishing, fur harvesting, and cultural practices.

GFN has participated throughout the Impact Assessment (IA) process to ensure that the Crown and the Proponent recognize the Project's direct and indirect effects on our Ancestral Homelands. We have also repeatedly insisted that despite the position of the Proponent and the Crown, the Project is obviously being advanced to facilitate resource development in the Ring of Fire. As a result, GFN faces not only project-specific impacts such as disturbance to lands, waters, and harvesting activities, but significant impacts from future mining-related development that is enabled by MFCAR. Despite including much of our Nation's perspective on the Project in the IA Report, the direct MFCAR impacts and the mining-related impacts are significantly underestimated in the Environmental Assessment / Impact Statement (EA/IS) from the Proponent or in the Impact Assessment Report (IA Report) and Conditions of Approval from the Impact Assessment Agency of Canada (IAAC).

The IA Report and draft Conditions of Approval acknowledge that the Project will enable broader development, cause adverse impacts to GFN's rights, and contribute to significant regional cumulative impacts. Despite this, the Crown has made an ultimate determination that the impacts to our Nation will be very limited and that the Project is justifiable based on the proposed mitigations. Given the utter failure of the Crown and the Proponent to provide the required GFN-specific accommodation, we find this determination by IAAC to be insulting and fundamentally flawed.

GFN does not support any development that ultimately supports mining in the Ring of Fire without our consent. GFN can only support this Project if the Crown and Proponent commits to accommodating the adverse impacts to our Treaty and Aboriginal rights and interests in an agreement that is comprehensive to all the road development related to the Ring of Fire. We insist that the Crown work with us to develop this agreement, immediately.



Summary of Findings

Ginoogaming has prepared this submission to ensure that our position on the MFCAR Project is clearly and accurately represented on the public record. Our submission herein is focused on the deficiencies or inaccuracies we have identified in the draft IA Report for the MFCAR.

Despite the fact that IAAC has occasionally acknowledged the input and perspectives of GFN and GFN members in the draft IA Report, overall, the IA Report dramatically understates the impacts to our Nation's rights and interests from the Project, both residually and cumulatively. Furthermore, the fact that IAAC has described the Crown and Proponent proposed mitigation measures as sufficient for the purposes of approving the Project demonstrates that the Crown has yet again failed to uphold its responsibilities as a Treaty partner with our Nation.

Table 1 presents an extracted summary of Table 5 from the draft IA Report. This table presents a summary of how IAAC has assessed the impacts to rights from the Project to the Nations they have categorized as the most impacted by the Project. In addition to GFN, this table presents the summary of impacts to rights to Animbiigoo Zaagi'igan Anishinaabek, Aroland First Nation, Eabametoong First Nation, Fort Albany First Nation, Kashechewan First Nation, and Marten Falls First Nation.

Table 1: Summary of Assessment of Potential Impacts of the Project on the Exercise of Rights on GFN and the other Most impacted Nations (from Table 5 in the Draft IA Report)

Criteria	Hunting and Trapping	Fishing and Water	Continued Way of Life
Likelihood	Potentially Low	Potentially Low	Potentially Low
Geographic Extent	Potentially Low	Potentially Low	Potentially Low
Frequency, Duration, Reversibility	Potentially Low	Potentially Low	Potentially Low
Community Health and Wellbeing	Potentially Low	Potentially Low	Potentially Low
Cumulative Impact	Potentially Low to Moderate	Potentially Low	Potentially Low to Moderate
Overall conclusions on impacts on rights	Potentially Low to Moderate	Potentially Low	Potentially Low to Moderate

While GFN generally agrees that we should be considered equally impacted by the Project as both Aroland First Nation and Marten Falls First Nation, we still assert that this assessment rates the impacts as too low to our Nation given the profound changes that our Nation will experience from the Project. Furthermore, the fact that some Nations that are much further from the Project are deemed to be similarly impacted by the Project as GFN diminishes the high intensity of land use by our Nation in the Project footprint. Our Nation's ancestral homelands overlap the footprint of the project and we have significant values located within the footprint of the project and the Regional Study Area (RSA) and Local Study Area (LSA). GFN has done significant work to document values and Indigenous Knowledge and have generated a heat map of values within the project footprint. For reasons pertaining to sensitivity, confidentiality and data sovereignty, the heat map will not be attached to this report as part of the public record, but if request, our Nation would be happy to discuss this map and the associated values it displays. Below is a description of the information that the map represents.

The heat map provides a summary of Ginoogaming's First Nations documented Indigenous Knowledge and Values within the RSA and LSA presented based on density within a grid of 5 square kilometer hexagons to preserve the sensitivity of data. Each hexagon is coloured based on the number of documented values within that hexagon and labelled as high, medium and low. A considerable amount of Indigenous Knowledge was documented within the study areas and based on this, it is clear that this area is significant and a sacred area to GFN members, and that mapping efforts could never exhaust the vast knowledge that is held in the community. The generated heat map only scratches the surface of adequately displaying the cultural, spiritual and ceremonial significance of these lands for members of Ginoogaming First Nation.

It should be noted that the Indigenous Knowledge documented within the heat map is not exhaustive and there is likely other information, knowledge, and perspectives that could be documented from our Nations members that would contribute to the overall findings in this report. A desktop review of the existing database of documented information/knowledge was performed focusing solely on the spatial boundaries of the RSA and LSA. Additionally, several interviews and focus group sessions that included mapping, sharing knowledge and discussion about the MFCAR project and its impacts were completed in May 2023. The desktop study and these interviews and focus groups form the basis of the information displayed on the heat map. Values were identified in the following categories. For the sake of maintaining confidentiality, nothing beyond the category of information the data falls within will be shared in this report and corresponding map. Our Nation has a high intensity of land use along the route, both historically and contemporaneously, including, but not limited to:

- Fur harvesting locations and areas
- Hunting locations and areas
- Hunting camps
- Fishing spots and areas
- Fishing camps
- Lived places
- Birth sites
- Burial sites
- Culturally significant areas
- Trails and travel routes, including winter trails
- Canoe routes and Onigam (portages)
- Spiritual sites
- Campsites
- Cabins
- Traditional teaching sites
- Pictographs
- Places of a story or legend
- Spawning areas
- Sensitive animal habitat
- Traditional placenames
- Tazhiikaaywinin (traditional land use areas)
- Historical and cultural sites
- Sacred sites and areas

To suggest that our impacts are comparable to more distant First Nations misrepresents the severity of impacts of the Project on our Nation.

GFN is among the Nations most affected by MFCAR. Where IAAC finds GFN comparably affected to other Nations, the practical burden on GFN is greater because comparable accommodation has not been provided.

Our Nation has prepared a series of comments and recommendations on the draft IA Report which are presented in Table 2. These comments all support our overall conclusion that **GFN can only support this Project if the Crown and Proponent commits to accommodating the adverse impacts to our Treaty and Aboriginal rights and interests in an agreement that is comprehensive to all the road development related to the Ring of Fire.** In support of this position, we require IAAC to revisit their determination of impacts on our Nation and conclusions regarding the sufficiency of mitigation measures. Furthermore, we expect the Crown to meaningfully incorporate our proposed revisions on the draft IA Report into the final IA Report.

Our Nation is a co-plaintiff on several legal cases that have a direct connection to this project, specifically the Treaty No. 9 legal challenge, the Mining Act Challenge and the Bill 5 / Bill C5 legal challenge. Ginoogaming can and will act to ensure that our Treaty and Aboriginal rights and interests are upheld and that the Crown fully honours their obligations to our Nation.

Table 2: Ginoogaming First Nation Comments and Recommendations on the MFCAR IA Report

#	Reference	Comment	Recommendation
1.	IA Report Section 4.4.2 (Existing Section 35 rights)	Section 4.4.2 states that: <i>"The project is located within the traditional lands of Marten Falls First Nation. The CDA overlaps with the traditional lands of Aroland First Nation, Eabametoong First Nation, and Ginoogaming First Nation overlap."</i> GFN agrees with the statement that the CDA overlaps our Ancestral Homelands, however it is not clear what distinction IAAC is making by stating that the Project is <u>within</u> the traditional lands of Marten Falls First Nation and <u>overlaps</u> the Ancestral Homelands of GFN. GFN notes that despite the accurate characterization that impacts to GFN from MFCAR are comparable to the impacts on Aroland First Nation and Marten Falls First Nation, we have not been similarly accommodated by the Crown. Thus, we are set up to experience the impacts of the MFCAR without corresponding benefits.	A. GFN requests that IAAC clarify the distinction between "within" and "overlap" in the context of the quote from Section 4.4.2. B. GFN requires IAAC to clarify in section 4.4.2 that impacts to Aroland First Nation and Marten Falls First Nation have been accommodated by the Crown, but comparable benefits have not yet been afforded to GFN. C. GFN requires the Crown to provide comparable accommodations to our Nation as have been afforded to Aroland First Nation and Marten Falls First Nation for the impacts to their rights from this Project and the Anaconda / Painter Lake Road upgrade Project (which also severely impacts GFN). D. GFN prefers that instead of using the word "overlap" to describe the geography of traditional lands, the word "shared" be used as it more accurately represents GFN's position about the land.
2.	IA Report Section 4.3.1.3 (Effects on current use of lands and resources for traditional purposes by	Section 4.3.1.3 states that: <i>"IAAC notes that federal and provincial legislative frameworks would apply to manage the effects of</i>	A. Given the reasonable uncertainty in relation to provincial and federal legislative frameworks, IAAC must increase the assessment of severity on hunting and fur

Indigenous Peoples – Cumulative Effects)	<i>the projects on fish and terrestrial wildlife. The Government of Ontario has legislative authority for wildlife management and decisions with respect to natural resources, and leads conservation initiatives for caribou in the province. In 2022, Canada and Ontario entered into a five-year conservation agreement under section 11 of SARA through which they agree to cooperate in the delivery of the conservation measures laid out in the agreement in a manner that minimizes duplication, maximizes efficiency, and respects each other's roles and responsibilities. The conservation measures laid out in the agreement are intended to support the long-term recovery of boreal caribou at the landscape-level. IAAC considers that existing applicable frameworks as well as the project-specific mitigation measures recommended in Section 4.3.1.4 would contribute to address the cumulative effects of the project on current use of lands and resources for traditional purposes."</i> GFN is extremely concerned with the reliance on "federal and provincial legislative frameworks" given that both the provincial and federal governments are actively repealing legislation to accelerate the development of projects, including MFCAR. GFN cannot accept reliance on existing legislative frameworks without a binding accommodation agreement between our Nation and the Crown.	harvesting from the Project to "potentially high", at least for GFN. B. GFN requires a commitment from both the provincial and federal governments to repeal Ontario Bill 5 (2025) and Bill C-5 (2025). C. GFN requires the Crown to commence negotiations of an accommodation agreement with our Nation immediately.
3. IA Report Section 4.3.3 (Effects on the health, social and economic conditions of Indigenous Peoples)	Section 4.3.3 states that: <i>"IAAC considered effects from the project that would occur in the LSA and the RSA. The LSA is the area where changes to community health and</i>	A. GFN insists on being included in the list of communities affected within the LSA and can provide IAAC requisite information to justify this demand.

	socio-economic conditions due to the project are likely to occur and includes Marten Falls First Nation and Aroland First Nation. The RSA includes the following communities identified in the IEPP: Animbiigoo Zaagi'igan Anishinaabek, Attawapiskat First Nation, Constance Lake First Nation, Eabametoong First Nation, Fort Albany First Nation, Ginoogaming First Nation, Kashechewan First Nation, Kitchenuhmaykoosib Inninuwug, Long Lake #58 First Nation, Mishkeegogamang First Nation, Neskantaga First Nation, Nibinamik First Nation, and Weenusk First Nation. IAAC's assessment relies on the limited community-specific information that was available at the time this report was prepared." GFN strongly disagrees that impacts to community health and socio-economic conditions in the LSA are limited to Aroland First Nation and Marten Falls First Nation. Socio-economic impacts are not easily geographically isolated to the communities at either terminus of the road. Much of the impacts will be felt throughout the municipality of Greenstone, and our Nation is actively and consistently on the land in the CDA. It is important to remind the Crown that impacts to GFN are comparable to those of Aroland First Nation and Marten Falls First Nation and yet we have not been afforded any accommodations similar to those Nations.	B. GFN demands that the quoted text from Section 4.3.3 be amended to note that under the current accommodation arrangements, GFN is the most impacted Nation because impacts to our Nation have not been accommodated, unlike the other LSA Nations.
4.	IA Report Section 4.3.3.4 (IAAC's recommended mitigation measures for implementation by the proponent pertaining to Section 4.3.3.4 is a Table entitled "IAAC's recommended mitigation measures for implementation by the proponent pertaining to effects on the health, social and economic conditions of Indigenous Peoples".	A. GFN demands that the Crown immediately commence negotiations with our Nation on an accommodation agreement for the MFCAR, Anaconda / Painter Lake Road upgrades and other Ring of Fire roads that

	effects on the health, social and economic conditions of Indigenous Peoples)	There is a shocking discrepancy between the limited, paternalistic mitigation measures proposed in Section 4.3.3.4 and the intense socioeconomic impacts that the Project will impose upon our Nation. It is important to note that our Nation is already in a state of emergency, and the Project will compound existing socioeconomic challenges through significant cumulative effects that are completely unmitigated at this point.	include measures that address the socioeconomic crisis our Nation is facing. B. GFN demands that IAAC include text in Section 4.3.3.4 that confirms that a necessary mitigation for the socioeconomic impacts of the Project on GFN is an accommodation agreement between GFN and the Proponent.
5.	IA Report Section 4.3.4 (Positive effects on Indigenous Peoples)	Section 4.3.4 states that: <i>"The proponent intends to hire, where possible, Indigenous persons for the construction and operation phases of the project. The hires would most likely reside in Marten Falls First Nation and possibly other Indigenous communities near the project, such as Aroland First Nation."</i> GFN is extremely disappointed with the proposed "positives" of the project. Indeed, these positives utterly and completely fail to mitigate and/or accommodate impacts to our Nation.	A. GFN insists that Section 4.3.4 be revised to clarify that there are no positives from the project that are afforded to GFN, despite being impacted equally to Aroland First Nation and Marten Falls First Nation. B. GFN insists that Section 4.3.4 clarify that both Aroland First Nation have been afforded additional accommodations by the Crown to mitigate impacts from the Project, and that those benefits have not been afforded to the comparably impacted GFN.
6.	IA Report Section 4.4.3 (Harvesting Rights - subsection Pathways of impact from the project on hunting and trapping rights informed by consultations with Indigenous communities)	Section 4.4.3 states that: <i>"the project would overprint and impede access to multiple community held traplines. Aroland First Nation, Marten Falls First Nation, and Ginoogaming First Nation noted that they hold traplines that would be overprinted by the CDA. Although the proportion of traplines that are overprinted by the road is small, Aroland First Nation shared that trappers' ability to trap successfully is tied to their deep knowledge of the land, including effective access routes."</i>	A. GFN demands that the quoted section of 4.4.3 be revised to clarify that GFN has insisted repeatedly that impacts to member Tazhiikaaywinin and ancestral homelands extend far beyond the land that is overprinted by the CDA, both through changes in experience of the land and through lower wildlife abundance and altered wildlife distribution.

		<i>Consequently, shifting trapping activity elsewhere within a trapline, due to land clearing or construction activities, may affect trapping success."</i> GFN agrees that our Nation is comparably impacted by the MFCAR to Aroland First Nation and Marten Falls First Nation in relation to fur harvesting. Despite this, no accommodations have been afforded to GFN that are comparable to Aroland First Nation and Marten Falls First Nation. Furthermore, IAAC fails to acknowledge GFN's clear message that our members' ability to exercise rights will be directly impacted far beyond the immediate disturbance area of the Project due to increased hunting pressures wildlife collisions, and avoidance of the area by wildlife.	B. GFN demands that IAAC acknowledge the Tazhiikaaywinin and ancestral homelands that are overprinted by GFN and the proportion of the alignment that is covered by GFN Tazhiikaaywinin and ancestral homelands.
7.	IA Report Section 4.4.3 (Harvesting Rights - subsection Pathways of impact from the project on hunting and trapping rights informed by consultations with Indigenous communities)	Section 4.4.3 states that <i>"Indigenous communities' use within and adjacent to the CDA is concentrated along the Albany and Ogoki Rivers, and their tributaries, which have been identified as key waterbodies by many potentially affected Indigenous communities."</i> While this statement from IAAC may be true for other Nations that have less intense land use in the area, this broad assertion overlooks GFN's extensive and intensive use along the MFCAR corridor, especially within GFN Tazhiikaaywinin and ancestral homelands.	GFN insists that this text be revised to clarify that GFN contemporary exercise of rights (especially for hunting, fishing, plant harvesting and fur harvesting) is not necessarily focused around the main waterways within the CDA and indeed covers much of the CDA.
8.	IA Report Section 4.4.6 (Conclusion on impacts)	Section 4.4.6 states that:	GFN insists that IAAC revise the quoted text to clarify that the impacts to exercise of rights on GFN specifically have not been adequately

	on Indigenous Peoples' rights)	<i>"IAAC is of the view that the potential impacts of the project on the exercise of section 35 rights of the above noted Indigenous communities have been adequately identified and appropriately mitigated or accommodated."</i> GFN strongly disagrees with IAAC's assertion.	mitigated or accommodated for both the residual and cumulative impacts of the project.
9.	IA Report Section 7 (Extent to which project effects contribute to sustainability)	Section 7 states that: <i>"The project's effects are likely to enhance overall economic and social well-being for Marten Falls First Nation and potentially other nearby Indigenous communities. The project's likely effects would also contribute to economic reconciliation and self-determination of Marten Falls First Nation. However, the project would likely have residual adverse federal effects on the environment, on Indigenous traditional practices, and on community well-being. Overall, the project is likely to make a net positive contribution to sustainability. The extent to which the project's likely effects contribute to sustainability is low."</i> Consistent with our other comments on the IA Report, Section 7 flagrantly overlooks the severe impacts to our Nation specifically (both residually and cumulatively). It is inappropriate and insulting to draw a conclusion that the project contributes to sustainability when there are such severe and unmitigated impacts on our Nation	GFN demands that IAAC change their determination of the project's contribution to sustainability by stating that the Project will be a net negative to sustainability on account of the severe unmitigated residual and cumulative effects to GFN. GFN would only consider changing our position upon a binding commitment from the Crown to accommodate the severe adverse residual and cumulative impacts to our Nation from the project.

Closing

GFN's comments on the draft IA Report point to several broad, fundamental problems:

1. The IA Report consistently understates the severity of the Project's adverse effects on GFN's rights and interests,
2. The IA Report overstates the effectiveness of proposed mitigation, and
3. The IA Report incorrectly suggests that impacts to GFN have been adequately accommodated.

GFN is among the Nations most affected by MFCAR, including in relation to harvesting, socio-economic conditions, community wellbeing, and the continued exercise of Treaty and Aboriginal rights. Yet unlike other comparably affected Nations, GFN has not received comparable accommodation. This disparity is unacceptable and must be expressly recognized in the final IA Report and remedied by the Crown immediately.

These concerns are heightened by the fact that MFCAR is being secretly advanced as the gateway to the Ring of Fire. As GFN has repeatedly stated, the Project will contribute to cumulative, long-term, irreversible changes across our Ancestral Homelands. The impacts of increased access, intensified development pressure, disturbance to wildlife and harvesting, and broader regional transformation cannot be meaningfully separated from the Project's direct effects. For this reason, project-specific mitigation alone is not sufficient.

GFN therefore maintains that the Project must not proceed on the basis that its effects are minor, justified, or adequately accommodated. **GFN will only support this Project if the Crown commits to accommodating the adverse impacts to our Treaty and Aboriginal rights and interests in an agreement that is comprehensive to all the road development related to the Ring of Fire.**