



Animbiigoo Zaagi'igan Anishinaabek

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To: Marten Falls Community Access Road Project
Impact Assessment Agency of Canada
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Cc: Hon. Greg Rickford, Minister of Indigenous Affairs and First Nations Economic Reconciliation and Minister Responsible for Ring of Fire Economic and Community Partnerships
Email: greg.rickford@pc.ola.org, minister.indigenousaffairs@ontario.ca

Re: **Animbiigoo Zaagi'igan Anishinaabek Comment on the Marten Falls Access Road Impact Assessment Report.**

On behalf of Animbiigoo Zaagi'igan Anishinaabek (AZA), we have prepared this submission in response to the Draft Impact Assessment Report for the Marten Falls Community Access Road Project (MFCAR; the Project). As the Impact Assessment Agency of Canada moves toward finalizing the Impact Assessment Report and supporting federal decision-making, AZA wishes to ensure that our Nation's perspectives, concerns, and expectations are clearly reflected on the public record.

The Draft Impact Assessment Report correctly recognizes our Nation as one of the Indigenous communities most directly impacted by the Project. IAAC concludes that the Project may adversely affect AZA's hunting and trapping rights, fishing rights, and right to a continued way of life, and places AZA within the same category of impact as Marten Falls First Nation and Aroland First Nation. AZA is indeed a rights-holding Nation whose future will be directly affected by decisions regarding the Project and the broader Ring of Fire development facilitated by the Project.

The Draft Impact Assessment Report relies extensively on information provided by AZA throughout the assessment process, with over 45 references to AZA evidence, concerns, and submissions. The Report acknowledges AZA's concerns regarding the potential loss of fish spawning habitat, changes to fish availability, increased competition for harvesting resources resulting from expanded access, and cumulative effects on the lands, waters, wildlife, and

resources that support the exercise of our rights. The Report also recognizes that traditional activities such as hunting, fishing, trapping, and gathering are fundamental to food security, cultural continuity, and the transmission of Indigenous Knowledge across generations. Further, IAAC acknowledges that barriers to practicing these activities may negatively affect community well-being and that existing pressures from development and environmental change have already affected the exercise of rights within the region.

While AZA appreciates the extent to which our concerns have been incorporated into the Draft Impact Assessment Report, we remain concerned that the significance of Project impacts and cumulative effects has been underestimated. The MFCAR is not a standalone project. It is a foundational component of broader Ring of Fire development, and its effects must be considered within the context of the future transportation, exploration, and mining activities it is intended to support.

Given IAAC's finding that AZA will experience a similar magnitude of impact from the Project as Marten Falls First Nation and Aroland First Nation, and recognizing the significant role that AZA's evidence played in informing the assessment, we believe it is appropriate for Ontario to engage AZA in discussions regarding economic reconciliation and benefit-sharing associated with Ring of Fire development. Ontario has recognized the importance of such arrangements through Shared Prosperity Agreements with other First Nations in the region. A Shared Prosperity Agreement with AZA would provide a fair and principled framework through which our Nation can participate in the benefits of development occurring within our Traditional Territory and reinvest those benefits into our people, our community, and our future.

As an Ojibway First Nation within the meaning of the Indian Act (Canada) and an Aboriginal people within the meaning of section 35(1) of the Constitution Act, 1982, our Nation has occupied our Traditional Territory, spanning both Robinson-Superior Treaty lands and Treaty No. 9 lands, since time immemorial. Development within this Territory must reflect this reality and ensure that our rights and interests are meaningfully recognized in both impact management and economic arrangements.

We therefore reiterate our request for the establishment of a formal engagement and negotiation process with the Province, including the advancement of a Shared Prosperity Agreement.

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<Original signed by>

Chief Yvette Metansinine, Animbiigoo Zaagi'igan Anishinaabek

cc. AZA Council
Kyla Morrisseau
Joe Donio
Will Metansinine