

SUBMISSION TO IMPACT ASSESSMENT AGENCY OF CANADA

# REGARDING THE REGIONAL ASSESSMENT IN THE RING OF FIRE

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# EXECUTIVE SUMMARY

NORDIK Institute is a community-based research group dedicated to the practice of holistic community development, with a focus on northern, rural and Indigenous communities. In response to the call for submissions related to the regional assessment in the Ring of Fire, we offer a number of recommendations and considerations that should inform the assessment premised chiefly on respect for Indigenous rights and on the broad range of communities that will experience the impacts of this development. With respect to the assessment's structure and scope, we recommend that:

- A majority of the assessment panel's members are selected by Indigenous communities within the primary area of impact, with emphasis on the inclusion of women, elders, youth, and persons living with disabilities.
- The assessment should consider the cumulative impacts of development and include communities where extracted minerals will be processed.
- The assessment should not take the place of any project-specific impact assessment.

Within these parameters, we advance several other matters for the assessment panel's consideration.

## **ECOLOGICAL CONSIDERATIONS:**

- Scenario development, cumulative effects assessment, and sustainability assessments that consider both direct and indirect threats related to new development, land use planning, and changes in the climate and wildfire patterns, among other criteria as co-determined with Indigenous communities.
- Baseline data for ecological assessments should be set drawing on both scientific and Indigenous knowledge sources.

## **CULTURAL & LINGUISTIC CONSIDERATIONS:**

- The impacts on sites of cultural significance, on cultural, spiritual and linguistic practices, and the ability of communities to maintain and/or develop those practices, as defined by local communities.
- Indigenous knowledge and practices are not only accounted for in the assessment, but integrated in the manner in which the assessment is carried out, including the use of Indigenous languages for communications.

## **SOCIO-ECONOMIC CONSIDERATIONS:**

- Impacts on traditional economic activities as well as consideration of the opportunity costs for locally-driven (endogenous) forms of economic development.
- Impacts of major fluctuations in income and rising inequality within communities in the review area, including impacts on aspects of social cohesion, physical and mental health, education, and social services.
- Impacts on current and future community infrastructure and ramifications related to cost and control of these resources.

## **Acknowledgement**

We wish to acknowledge the financial support of Mining Watch Canada whose contributions allowed us to complete this submission.

## ABOUT NORDIK INSTITUTE:

Northern Ontario Research Development Ideas and Knowledge (NORDIK) Institute is Algoma University's Community-Based Research Group and has worked to build research capacity, fill knowledge gaps, and work with communities in Northern Ontario to advance community development initiatives since its incorporation in 2006. It holds a focus on Indigenous, rural and northern communities.

NORDIK Institute draws its expertise from scholars across a wide range of fields, including economics, business administration, sociology, fine arts, education, environmental sciences, forestry, and biology. Working with affiliated faculty at Algoma University, research associates across universities throughout Canada and independent scholars, NORDIK Institute connects communities, local government, social services, not-for-profit corporations and social enterprises with the research expertise they need to respond to the challenges of the contemporary world.

NORDIK Institute is community owned and governed in the same collaborative spirit that guides its work. Its Board of Directors is made up of seven members, including representatives from Algoma University, as well as citizens engaged in community development practice across the North, with no less than 40% of its directors being of Indigenous ancestry.



# RECOMMENDATIONS FOR THE REGIONAL ASSESSMENT IN THE RING OF FIRE

In 2015 the government of Canada signaled its intention to implement the United Nations Declaration on the rights of indigenous peoples and introduced legislation to that effect in December of 2020 (Canada 2020). It is our contention that although legislation on implementing this declaration has not yet become law, that the principles underlying the Declaration must be considered in relation to any regional assessment impacting indigenous communities across Canada. The Ring of Fire is unique in that the region impacted is not only indigenous territory, indeed there are no non-indigenous permanent settlements within 200 km of where mining stakes have been claimed. With this in mind, we affirm that the regional assessment must be carried out in a manner that recognizes the principles of the Declaration. Critical among these is the principle of self-determination. Article 3 indicates:

Indigenous peoples have the right to self-determination. By virtue of that right they freely determine their political status and freely pursue their economic, social and cultural development. (UNDRIP 2007)

Self-determination is thus inclusive of the economic, social, and cultural aspects of indigenous communities, and conscious changes that impact the dimensions of the region should be undertaken with the free, prior and informed consent and input of these communities. Furthermore, the federal and provincial governments must not be considered equal stakeholders with Indigenous communities, as for much of the permanently settled assessment area, they do not have constituents that are unique from Indigenous communities. To that end, we feel that it is imperative that Indigenous communities hold a majority of the representation on the original assessment panel, and that such representation be selected by impacted communities' elected councils and traditional leadership.

Subsequent articles of UNDRIP are also instructive in informing how such assessments should take place:

Article 5 - Indigenous peoples have the right to maintain and strengthen their distinct political, legal, economic, social and cultural institutions, while retaining their right to participate fully, if they so choose, in the political, economic, social and cultural life of the State.  
[...]

Article 18 - Indigenous peoples have the right to participate in decision-making in matters which would affect their rights, through representatives chosen by themselves in accordance with their own procedures, as well as to maintain and develop their own indigenous decision-making institutions.  
[...]

Article 19 - States shall consult and cooperate in good faith with the indigenous peoples concerned through their own representative institutions in order to obtain their free, prior and informed consent before adopting and implementing legislative or administrative measures that may affect them.  
[...]

Article 22.1 - Particular attention shall be paid to the rights and special needs of indigenous, elders, women, youth, children and persons with disabilities in the implementation of this Declaration.  
(2007)

Indigenous communities whose traditional territories fall within the assessment area should be able to exercise their right to both maintain distinct institutions while participating fully in the political life of the State, to determine their own representation in decision-making or consultative bodies, and to define the parameters for what constitutes sufficient information to guide local decision making. We propose that striking such a balance entails Indigenous communities playing an authoritative role and controlling interest in shaping the terms of reference for the assessment and how decisions are made therein. Respecting Article 22.1, there must also be special consideration and inclusion of the voices of Indigenous elders, women, youth, children, and persons with disabilities. Additionally, any assessment must respect the right of communities to conduct their own assessments based on their own protocols.

Respecting the authority of Indigenous communities to determine the Terms of Reference for an assessment of impact on their traditional territories, we offer a number of considerations based on research, past precedent and experience in the pages that follow.

## Regional Scope and Approach

There remains an underlying challenge for the regional assessment insofar as it has not yet defined the geographic area that is the Ring of Fire. The Ring of Fire is typically referred to areas of substantial mineral deposits in the “Far North” of Ontario in the James Bay lowlands, including copper, nickel, platinum, and chiefly chromite (MENDM, 2021).

Given the question of development of the Ring of Fire entails the mining of these mineral deposits and that any mining entails the processing of extracted materials, the impacts of development are not only conceptually broad, but also geographically expansive. Any contamination to the surface-level water sources from mining operations will have risks of contamination and other consequences downstream. Similarly, the other considerations outlined below index the potential for environmental impacts in geographic proximity to the transportation and processing of these raw materials. Consequently, we recommend that the regional scope include the James Bay watershed as well as the communities in which such materials will be processed. Additionally, respecting the jurisdiction of Indigenous communities within this region, the impact assessment must be carried out in a way that respects the consultation protocols of First Nation and Métis communities within its regional scope.

“Impact” on natural and human environments is not something that occurs in isolation from the history of previous development. We thus recommend that the assessment address a broad temporal scope encompassing the cumulative impact of development within the Ring of Fire, considering the impact of multiple projects over time. The regional assessment should also not replace environmental assessments for individual projects, especially as the specific parameters of many such projects will be undetermined during the time of the regional assessment.

## Ecological Considerations

The nature of the industrial developments that have been proposed for the region entail many potential risks to local ecosystems. The region surrounding the Ring of Fire is home to the largest contiguous stretch of boreal forest free of industrial development, the third largest contiguous wetland, and is one of the richest carbon storehouses on earth, as well as being home to many species at risk, including boreal caribou, lake sturgeon, polar bears, and wolverines (Riley, 2011; COSEWIC 2014, 2006, 2002; Ontario 2019).

In their discussion paper submitted regarding the Terms of Reference for the Regional Assessment in the Ring of Fire, Cheryl Chetkiewicz of the Wildlife Conservation Society Canada identifies a number of ecological values to guide the geographic and temporal scope of the Regional Assessment, including measures of ecological integrity related to the size and intactness of highly valued ecosystems; the sustainable population metrics of highly valued species; contaminant loads in ecological systems; metrics for ecosystem services and for regulating same; and the ecological integrity and connectivity within existing protected areas and conserved areas, as well as Indigenous Protected and Conserved Areas (2021, pp. 24-6). We fully concur with these recommendations and lend our voice in support of their incorporation into the regional assessment.

Likewise we support WCSC's proposal that the regional assessment should include scenario development, cumulative effects assessment, and sustainability assessments that consider both direct and indirect threats, as co-determined with Indigenous communities, related to new development, land use planning, and changes in the climate and wildfire patterns, among other criteria (2021, pp. 26-8). Climate change has also already begun to have impacts on the ecology of the James Bay lowlands and other areas of Northern Ontario (MNR, 2011). Considerations of environmental impact must thus take into account the range of predictable climate changes that may impact the assessment area, including changing water levels, temperature, and patterns of weather severity, among others. Baseline data should be set, as the WCSC recommended as well, on the historical range in natural variability within the ecosystem as represented by both scientific and Indigenous knowledge sources (2021, p. 27). We refer the reader to WCSC's submission for more detailed recommendations, which we wholeheartedly endorse.

Additionally, it must be acknowledged that the biophysical ecological context, as well as the impacts of climate change, are intertwined with the cultural, linguistic, social and economic considerations that are identified subsequently. Though we present them separately for the sake of clarity, they should be considered in a manner that respects their interconnection.

## Cultural Considerations

Northern Ontario, and the *Ring of Fire* are positioned within an intricate, interconnected and interdependent watershed that includes major rivers such as the Attawapiskat, Albany, Ekwan and Winisk and thousands of other streams that flow into the Hudson Bay and Jame Bay. Indigenous Elders and leaders refer to the watershed and rivers as the “life blood of our culture and our way of life” (Timmins Daily Press, 2021). Development in the *Ring of Fire* represents significant changes to the socio-economic realities in which many of the Region’s communities are situated. Cultural practices are significantly connected to socio-economic conditions that shape, influence, and even make certain interactions tenable between people and the natural world, and changes to those conditions may have major ramifications to local cultures. The communities, wildlife and ecological systems that live within the watershed rely on these waters for migration, livelihood, cultural distinctiveness through storytelling, histories and survival. Consequently any impacts thereon have a bearing on the rights outlined in Article 11.1 of UNDRIP:

Indigenous peoples have the right to practise and revitalize their cultural traditions and customs. This includes the right to maintain, protect and develop the past, present and future manifestations of their cultures, such as archaeological and historical sites, artefacts, designs, ceremonies, technologies and visual and performing arts and literature (2007).

The ecology of the Hudson and James Bay watersheds plays an immeasurable role in local culture, charting pathways of communication and trade, habitat for specific medicines that are integral to ceremony, as the home of ancestral burial grounds, and habitat for the wildlife that make fishing, trapping and hunting possible. Indigenous communities rely on these waterways to practice distinctive traditions, customs and ceremonies that have been passed down intergenerationally since time immemorial, such as rites of passage and relationships to land through ceremonial practices (Nishnawbe Aski Nation (NAN) Deputy Grand Chief Derek Fox, Bearskin Lake First Nation, personal communication, 2021). These waterways are also significant to these communities through ancestral burial and significant historical sites which are located along the major rivers found within the watershed (Chief Christopher Moonias, Neskantaga First Nation, personal communication, 2021). Respect for and consideration of these factors is affirmed in article 12.1 of UNDRIP, which states:

Indigenous peoples have the right to manifest, practise, develop and teach their spiritual and religious traditions, customs and ceremonies; the right to maintain, protect, and have access in privacy to their religious and cultural sites; the right to the use and control of their ceremonial objects; and the right to the repatriation of their human remains (2007).

The Regional Assessment of Offshore Oil and Gas Exploratory Drilling East of Newfoundland and Labrador took Indigenous knowledge into account respecting the processes it undertook, however it stopped short of investigating specific cultural impacts or exploring the cultural and linguistic environment as a unique environmental setting (Bangay & Foote, 2020). Yet, especially given the immediate proximity and impact of any development in the *Ring of Fire* for Indigenous communities, new major developments within the region can be expected to have impacts on the socio-economic and ecological environments within the review area. We strongly recommend that impacts on cultural, spiritual and linguistic practices, and the ability of communities to maintain and/or develop those practices, be part of the explicit investigation of the regional assessment. Furthermore we hold that Indigenous communities themselves must be the ones to determine what practices are considered.



Similarly, the review panel should also undertake this work in a manner that respects Indigenous knowledge and worldviews, particularly in relation to how humans interact with the rest of the natural world (which may itself entail the inclusion of ceremony into the assessment process, among other forms of indigenous knowledge). The assessment should also consider any impacts on specific cultural sites, including ancestral burial locations, as defined by local communities.

## Language Considerations

Indigenous languages reflect, shape and carry knowledge, worldviews and histories related to the localized areas from which they emerge; sustaining Indigenous languages preserves identities, cultures, ecological knowledge while reinforcing relationships between land, and species that are interconnected to one another that showcase understandings of interspecies symbiosis (McIvor, 2018). This understanding of language is also echoed by Indigenous peoples in Northern Ontario, in that being able to speak the language of their ancestors is an intergenerational transfer of knowledge that solidifies connection and belonging. Disconnection from language can have negative impacts on physical, mental, spiritual and emotional health (Chief Christopher Moonias, Neskantaga First Nation, personal communication, 2021). Although Indigenous languages are embedded with priceless knowledge, most Indigenous languages throughout Ontario are vulnerable to or face severe prospect of extinction within the next few decades due to a confluence of the impacts of colonization, explicit policies of cultural genocide as exhibited by the Indian Residential School Policy, and the significant socio-economic upheaval that resulted (Hill, 2004; TRC, 2015). The isolation of communities in the *Ring of Fire* from the surrounding settler hegemony in Canada has been part of the contributing social ecology that has sustained Ojibwe, Oji-Cree, Cree and Algonquin languages in this part of the world.

This is not to suggest that communities must remain frozen in time for the sake of limiting impact on local language and culture. Languages and cultures change based on responses to their evolving surroundings. No living language exists without change. However, Indigenous communities have the right to revitalize, use, develop, and transmit their languages to future generations and cultural self-determination (UNDRIP 2007, Article 13.1), meaning that where predictable influences or changes may occur in a given culture, those Indigenous communities have the right to reflect on and make informed decisions concerning how these changes will impact those respective communities. We thus recommend that the assessment consider the potential impacts of any development on the future domains and patterns of language use and intergenerational transmission of Indigenous languages.

TABLE 1:

## NUMBER AND PROPORTION OF PEOPLE WHO SPEAK AN INDIGENOUS LANGUAGE AS A MOTHER TONGUE

FIRST NATION	NO. OF PEOPLE WHO SPEAK AN INDIGENOUS LANGUAGE AS A MOTHER TONGUE (single response)	PROPORTION OF THE POPULATION (single response)
Webequie	575	79%
Marten Falls	55	22%
Neskantaga	120	51%
Nibinamik	250	68%
Constance Lake	105	18%
Aroland	90	25%
Long Lake 58	30	8%
Ginoogaming	25	12%
Eabametoong	280	28%
Mishkeegogamang	135	31%

As Table 1 indicates, the communities in closest proximity to the *Ring of Fire* have among the highest rates of Indigenous language maintenance. Thus the maintenance of Indigenous languages within the larger speech communities of Anishinaabemowin, Anishiniimowin, Nehinawewin, and Iliimowin stand to be impacted by development within the region.

Table 1 also indicates the extent to which such languages remain a vital part of the life within the communities in closest proximity to the *Ring of Fire*. Local traditional ecological knowledge that has been observed since time immemorial is shaped by the semiotic systems innate to Indigenous languages. For all community members to be able to take part in consultations and the assessment process, special considerations must be made on the language of communication. Indigenous communities have a right to understand proposed changes to their local ecology through the Indigenous languages that are reflective of their knowledge, history, worldview and culture. As indicated in Article 13.2 of UNDRIP:

States shall take effective measures to ensure that this right is protected and also to ensure that indigenous peoples can understand and be understood in political, legal and administrative proceedings, where necessary through the provision of interpretation or by other appropriate means. (2007)

Consequently community members who are consulted during the regional assessment should be able to be consulted in the language of their choice, and information about the regional assessment and its final reports should be made available and disseminated in all of the Indigenous languages of the assessment area.

## Socio-Economic Considerations

The prospect of development within the *Ring of Fire* has been highlighted as a major economic opportunity for Indigenous communities in Northern Ontario. This is an especially motivating concern as communities within the area have chronically high rates of unemployment and have limited opportunities with respect to waged labour (Statistics Canada 2017a-j; Walters 2016). Economic development within the regions must nonetheless be conducted in a manner that is in keeping with Indigenous communities' right to self-determination. Two articles of the UNDRIP highlight Indigenous socio-economic rights that are particularly relevant to considerations of development impact.

Article 20 I. Indigenous peoples have the right to maintain and develop their political, economic and social systems or institutions, to be secure in the enjoyment of their own means of subsistence and development, and to engage freely in all their traditional and other economic activities.

Article 21 I. Indigenous peoples have the right, without discrimination, to the improvement of their economic and social conditions, including, inter alia, in the areas of education, employment, vocational training and retraining, housing, sanitation, health and social security. (2007)

The utility of conventional economic measures, such as gross domestic product and even rates of employment, is predicated on communities or regions sharing certain features of economic structure, such as participation in the market and a prevalence of waged labour accounting for a significant share of local production. However, many Indigenous communities, particularly those considered “fly-in” or “isolated” (though it must be acknowledged that these labels infer an orientation to southern urban centres) have very different economic structures that blend market-based forms of production and consumption and what are often referred to as “subsistence” activities. Hunting, trapping, and fishing, among other practices, are an integral part of the local economy in many Indigenous communities not out of desperation, but because they are part of the systems of survival — of production and reproduction — that have emerged over millennia in response to the local environment. Impact on the natural environment, then, that would impact populations and migratory patterns of birds, mammals, and whatever species on which the community relies, are not only ecological impacts but economic impacts on the community as well. Disruptions to these populations represent an infringement on the rights of communities to engage freely in their traditional economic activities. We recommend that these impacts be considered and that local communities determine the species that should be assessed with respect to the economic impact of any development of the *Ring of Fire*.

Nonetheless, the disproportionately high levels of unemployment and poverty in so-called remote communities is a matter of significant injustice. Some have argued that the processes and outcomes of colonization have imposed economic structures on Indigenous communities while simultaneously depriving them of the resources necessary for those structures to function as they do in settler communities (Cheechoo 2008; Wood, Loney & Taylor, 2015). Consequences have included high rates of reliance on income assistance and other government transfers and higher rates of food insecurity (Gruner, Meades & Broad, 2019). Yet unemployment in many cases is tied directly to the scarcity of employment opportunities on-reserve (Gruner, Meades & Broad, 2019). Yet resource extraction and development are not the only options that may define the economic futures of Indigenous communities within the review area. There has been a longstanding recognition of the need to develop local economic opportunities in Indigenous communities across northern parts of the continent, bearing in mind alignment with local strengths, culture and values (Cheechoo 2008; Wood, Loney & Taylor, 2015).

In 1964, the Government of Ontario entered into an agreement with the federal government to deliver income assistance and related social services to First Nation communities, however this was intended to be paired with a corresponding federal-provincial community development agreement which would have constituted “a major socio-economic development program [...] that would provide new investments, foster more local government and address the education, employment, housing and income standards” in First Nation communities (TAP, 1979, p. 136). However, as the 1979 *Review of Community Social Services to Indians in Ontario* highlighted, the community development agreement was abandoned and never signed, and the community development programs offered by the then-Department of Indian and Northern Affairs “took a narrower focus than that of the proposed agreement: It concentrated on leadership development and local government” (1979, p. 136). The review noted that as a result, rates of income assistance were largely unchanged (1979, p. 136). Forty-two years after the first review, neither government has implemented a comprehensive community development program or strategy that would support First Nation communities in shaping their economic futures. It is not a lack of local will or assets that has prevented such an endogenous approach to local economic development, but rather a lack of federal priority and investment.

Though natural resource development has been noted among the opportunities for local economic development in Northern Ontario Indigenous communities, it is but one among many emerging industries, including tourism and alternative energies (Madahbee, 2013). Other communities and individuals have drawn on strategies of social entrepreneurship, import replacement, and social development to create local opportunities and approach self-sustaining economies (Wood, Loney & Taylor, 2015). Such strategies draw on local assets and respond to local priorities. While the *Ring of Fire* represents a significant opportunity to generate profit and income, its development thus far has been driven by private interests and the provincial government, with ownership located well beyond the communities most impacted by the development. Though the companies that have purchased mining stakes have (and are legally obligated to) consult with surrounding Indigenous communities in whose traditional territory the developments would take place, they are nonetheless examples of exogenous development, or development driven by actors outside of the community, drawing on the community's location and resources. No matter to what degree a community may choose to be involved in the development of the *Ring of Fire*, those developments will impact the regional economy and thus the realm of possibilities for locally determined economic futures. Consequently, we recommend that the regional assessment should also consider the impact of *Ring of Fire* development on other local economic development initiatives, including the opportunity cost on endogenous local economic development initiatives of diverted financial investment, human resources development and training, and government support, such as Band Office, federal or provincial staff time and assistance.

Assessing the impacts of development within the region cannot be viewed in isolation from existing social contexts. Among those conditions that must be considered is the longstanding epidemic of youth suicide throughout Indigenous communities in Northern Ontario, which has taken the lives of youth as young as 11 years of age. In 2017, Indigenous Services Canada and Nishinawbe Aski Nation came to agreement on support for suicide prevention in what is known as the Choose Life initiative (Barrera, 2019). As a result, Indigenous communities have been investing funding into land-based programming that connects Youth to the land as a way of supporting healing (Barrera, 2019). The relationships Indigenous peoples have to the land is one that is built on mutuality, the maintenance and rekindling of which is integral to healing from numerous forms of trauma. The impacts on a broad range of considerations tied to physical and mental health, including community responses to youth suicide, are thus an important consideration of the impacts of development that will impact the surrounding environment.

Further social considerations flow from the nature of resource extraction economies. Industries such as mining are dependent on commodity prices, which fluctuate depending on a variety of international circumstances. As a result, they are more prone to rapid growth during periods of high commodity prices, and rapid decline during periods of low price. Such fluctuations have significant implications for those working within the sector and the communities in which they work and reside. Where Northern Ontario's dependence on primary resource sectors, and decline therein throughout the 1990s in particular, has provoked greater attention to economic diversification in the region at large (Conteh, 2013). Indigenous peoples have not generally been the beneficiaries of mining development in other parts of Ontario, the most lasting example being litigation surrounding the revenue sharing committed to in the Robinson Treaties, while concerns over environmental impact have most recently led Chief of the Mushkegowuk Council to call for a moratorium on mineral development (MacDonald, 2020; Timmins Daily Press, 2021). Where community members are able to access employment, rapid increases in financial inequality within small communities often lead to rising social tensions and rising costs (such as with housing or food prices) that leave others farther behind (Summers & Branch, 1984). Depending on the scale of development, the impact of mining and-or processing within the region will impact not only labour market conditions, but also housing markets, education, social services, and local social norms (Summers & Branch, 1984). The "Boom-Bust" cycles of economic activity within the primary resource sectors have been linked to a number of social challenges, including interpersonal violence and substance abuse, the effects of which disproportionately impact Indigenous women, girls, and 2SLGBTQIA people (MMIWG 2019). Similarly, communities outside of the immediate region who may service the area, whether through health and social services or labour force accommodation, experience similar strains. Thus we recommend that the assessment consider the impacts of rapid rises in inequality in Indigenous communities within the area, as well as those service centres that are likely to house many of the employees of any development.

For First Nations and other communities within the review area alike, development within the region will not only draw on proposed new infrastructure, such as access roads, but existing infrastructure, including roads, railways, sewer systems, waste management facilities, and housing stocks. DeBeers' 2005 discharge of its sewage into the Attawapiskat pumping station is among the most egregious examples of local community infrastructure being pushed beyond its limits by outside companies, and had devastating consequences for the local community (Michelin, 2011). In addition to the impacts on these forms of infrastructure, the cost of their maintenance and repair and the consequences that this poses for community financial solvency must also be assessed. First Nations and municipalities do not have the same degree of financial flexibility that large public governments do, and the jurisdictional classification of infrastructure (notably sewer systems, landfills, water treatment facilities, and many forms of housing) within either First Nation or municipal purviews can leave cash-strapped local governments with few options in the face of assets that crumble long before their expected lifespan due to unexpected overuse. Additionally, questions of ownership and resourcing must be investigated related to new infrastructure, to ensure that new infrastructure is being developed in keeping with community priorities and they have the resources and control to manage them in the manner they see fit.

## Summary of Recommendations

- At minimum, a majority of the review committee's membership must be selected by the First Nations and Métis communities within the determined area of the study. Both elected and traditional leadership must play a role in this selection.
- Elders, youth and persons living with disabilities must also have representation on the review committee, and a significant proportion must be women.
- The regional scope should include the geographic areas corresponding to at minimum the entire watershed of those areas where mining operations may take place, and be guided, as recommended by the Wildlife Conservation Society, by the values of ecological integrity measured by the size and intactness of highly valued ecosystems; the sustainable population metrics of highly valued species; contaminant loads in ecological systems; metrics for ecosystem services and for regulating same; and the ecological integrity and connectivity within existing protected areas and conserved areas, as well as Indigenous Protected and Conserved Areas
- The regional scope should also encompass areas where minerals will be processed, with their corresponding geographies defined by the same environmental criteria.
- The Impact Assessment must be carried out in a manner that respects the consultation protocols of Indigenous communities whose territories lie within the region.
- All documentation, consultations must be translated into the localized Indigenous language and interpretation and translation services must be made accessible in the language of the community's choice.
- Additionally, we recommend that the impact assessment consider:
  - » The temporal scope of the assessment should consider 50-100 years into the future and include consideration of the cumulative effects of development and modeling for diverse scenarios.
  - » Baseline data for ecological assessments should be set on the historical range in natural variability within the ecosystem as represented by both scientific and Indigenous knowledge sources.
  - » Scenario development, cumulative effects assessment, and sustainability assessments that consider both direct and indirect threats related to new development, land use planning, and changes in the climate and wildfire patterns, among other criteria as co-determined with Indigenous communities.
  - » The impacts on cultural, spiritual and linguistic practices, and the ability of communities to maintain and/or develop those practices, as defined by local communities.
  - » The impacts on specific cultural sites, including ancestral burial locations, as defined by local communities.
  - » Ways to integrate and respect Indigenous knowledge and worldviews in the assessment process (which may itself entail the inclusion of ceremony into that process) as determined by local communities).

- » The impacts of any development on the future domains and patterns of indigenous language use and the intergenerational transmission of Indigenous languages.
- » The impacts on traditional economic activities, including but not limited to hunting, trapping, and fishing, and that disruptions to plant and animal species that communities identify as pertinent to local traditional economies be taken into consideration.
- » The impact on other local economic development initiatives, including the opportunity cost on endogenous local economic development initiatives of diverted financial investment, human resources development and training, and government support.
- » The impacts on physical and mental health, including community responses to youth suicide.
- » The impacts of rapid rises in inequality in communities within the review area.
- » The impacts on existing local infrastructure (including roads, railways, waste facilities, water filtration and treatment facilities, and any other infrastructure identified by local communities), including impacts on maintenance and repair costs, and the financial consequences for local (First Nation and municipal) governments.

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