



IAAC Reference Number: 80468

February 2, 2022

Regional Assessment in the Ring of Fire Area
Impact Assessment Agency of Canada
160 Elgin Street, 22nd floor
Ottawa, Ontario K1A 0H3

Sent via email: regionalrof-cdfregionale@iaac-aeic.gc.ca

RE: Natural Resources Canada Comments on the Draft Agreement to Conduct a Regional Assessment in the Ring of Fire Area

Attn: Stephen Bonnell, Manager, Strategic and Regional Assessments

Dear Dr. Bonnell,

On December 10, 2021, the Impact Assessment Agency of Canada (IAAC) informed Natural Resources Canada (NRCan) of the 60-day public comment period on the draft Agreement to Conduct a Regional Assessment in the Ring of Fire area (draft Agreement). We thank IAAC for this opportunity to review and provide comments on the draft Agreement.

In general, our comments on the draft Agreement seek clarification on terminology and provisions within the draft Agreement and Terms of Reference, including suggestions for the assessment priorities.

NRCan is committed to improving the quality of life of Canadians by ensuring the country's abundant natural resources are developed sustainably, competitively and inclusively. Through its broad mandate, NRCan has diverse areas of expertise that could support the Ring of Fire Regional Assessment, including on forests and forestry, geology and hydrogeology, minerals and mining, mining economics, earth observation and monitoring, and explosive manufacturing and storage regulated under the *Explosives Act*.

Attached are NRCan's comments on the draft Agreement. For additional information, contact Anica Madzarevic (Anica.Madzarevic@nrca-rncan.gc.ca) or Sara Ryan (Sara.Ryan@nrca-rncan.gc.ca).

Sincerely,

Caroline Cloutier
Senior Director, Impact Assessment and Science Capacity
Office of the Chief Scientist

Attachment 1 - Comments on the draft Agreement to Conduct a Regional Assessment in the Ring of Fire Area

Attachment 1 - Comments on the draft Agreement to Conduct a Regional Assessment in the Ring of Fire Area

No.	Section in the draft Agreement	Comment	Suggestion
1	Definitions	The definition for "Study Area" should refer to Section 2.4 instead of Section 2.5.	Consider revising the definition to: "Study Area means one or more Study Areas for the Regional Assessment defined by the Committee, as described in Section 2.4 and Appendix A of this Agreement". In addition, consider clarifying that the geographic boundaries of the Assessment Area and Study Area are not the same, and explaining how they are different.
2	Definitions	The definitions section includes entries for "Assessment Area" and "Study Area". The cursory definition of "Study Area" refers the reader to section 2.5 and Appendix A for more detail. However, the distinction between "Assessment Area" and "Study Area" remains unclear.	In section 2.0 (Scope of the Regional Assessment) and in Appendix A, clearly define and contrast what is meant by "Assessment Area" and "Study Area".
3	Definitions	The definition for "mine development activities" potentially excludes pre-mine development activities that are related to mining development, such as intense exploration campaigns.	Consider including pre-mine development activities in the scope of the Regional Assessment.
4	1.1	Would suggest that there is a gap in describing the goal for the Regional Assessment as it focuses on "mine development activities" and does not mention sustainable activities.	Consider modifying to mention the goal is towards sustainable activities.
5	1.1	Unclear what is meant by "other existing and future physical activities."	Clarify what is included in other existing and future physical activities (i.e. exploration activities or only mine development activities?).
6	1.2 a)	Unclear what will be analyzed in the objectives.	The word analysis should be used in association with what is being analyzed. Clarify if data, policies, concepts and/or theories will be analyzed.
7	1.2 a)	Unclear what is meant by regional-scale.	Suggest specifying the region (i.e. Ring of Fire area only, or Far North Ontario?).
8	1.2	Possible gap in the list of conditions (environmental, health, cultural, social and economic conditions). Given the focus on mine development activity, there is a need for a desktop analysis based on known geology (maps, open reports, etc...) to develop a risk ranking for acid mine draining potential based on the likelihood of sulphide minerals and actual observations. This is a common approach for pipelines in cases where you cannot reasonably sample all material that will be disturbed.	Consider including geological conditions in the list of conditions.
9	1.2 b)	The wording of this section makes it seem like there would be mitigation measures for positive effects.	Suggest rephrasing, so it is clear that mitigation measures refer to the potential adverse impacts.
10	2.1	Gap in the scope of the Regional Assessment (i.e. physical activities), making it unclear if the Regional Assessment will include infrastructure development, such as roads, railroads etc... associated with the mine development activities.	Suggest clarifying how the Regional Assessment (i.e. physical activities) will include/address infrastructure development, such as roads, railroads etc.
11	2.2	The geographic boundary of the Assessment Area for this Regional Assessment encompasses an area well beyond the future mine development activities in the McFaulds Lake Greenstone Belt.	Clarify details on the criteria that were used to establish the geographic boundary of the Assessment Area.
12	2.2	Section 2.2 describes the rectangular geographical extent of the "Assessment Area" for the Regional Assessment as shown in Appendix A. However, when addressing the assessment priorities listed in Section 2.3, it may be more appropriate to specify physiographic boundaries for study, such as watersheds. Physiographic boundaries could be more relevant to the traditional Indigenous users of the land.	In Section 2.2, consider indicating that the "Assessment Area" overlaps with part of the Attawapiskat and Ekwan Rivers watersheds, the geological contact between Precambrian igneous and volcanic rocks of the Canadian Shield, and the Paleozoic sedimentary rocks of the Hudson Bay Lowlands. Consider presenting this information in maps/figures as part of the Terms of Reference. This aims to present the boundaries in a more intuitive manner that is more relevant to Indigenous people who travel, hunt and fish in the area. Consider also acknowledging here that the "Assessment Area" lies within Treaty #9 territory.
13	2.3	Unclear what is meant by a regional-scale approach.	Explain what is meant by a regional-scale approach in section 2.3.

Attachment 1 - Comments on the draft Agreement to Conduct a Regional Assessment in the Ring of Fire Area

No.	Section in the draft Agreement	Comment	Suggestion
14	2.3	The first sentence implies that it is followed by a summary of the Assessment Priorities, however these priorities are summarized after an explanation of what the priorities represent.	Consider rephrasing the paragraph as follows: "In identifying and considering potential positive and adverse effects, the Regional Assessment will focus on Assessment Priorities, which represent key environmental, social, cultural and economic components which may be affected by future mine development activities in the Assessment Area. However, these priorities are often challenging to address solely through individual project-level assessments and decisions, making a regional-scale approach to effects assessment and management appropriate and beneficial. This focus is intended to enable improved efficiency and effectiveness of future project impact assessments. The focus will be on the following Assessment Priorities: ...".
15	2.3	The Agreement does not mention cumulative effects related to climate change or other natural environmental dynamics.	Consider including cumulative effects related to climate change or other natural environmental dynamics in the scope of the Regional Assessment, potentially as an assessment priority.
16	2.3	Unclear if Assessment Priorities include 'Potential to increase the impacts of natural hazards due to alterations of the landscape'.	Suggest adding to the Assessment Priorities: 'Potential to increase the impacts of natural hazards due to alterations of the landscape'
17	2.3	Unclear whether the Regional Assessment will include a description and analysis of the baseline conditions of the assessment priorities.	Suggest including the following statement at the beginning of section 2.3: "Quantification of baseline conditions is essential as the determination of effects is based on a comparison of predicted effects to baseline conditions".
18	2.3	<p>Suggest clarifying Assessment Priority "a) Surface and ground water (quality and quantity), including wetlands (peatlands)". Further suggest clarifying whether Fish and fish habitat will be considered as part of this Assessment Priority. Fish and fish habitat are areas of federal jurisdiction under the <i>Fisheries Act</i> and the Metal and Diamond Mining Effluent Regulations; however, they are not currently mentioned in the draft Agreement. Suggest that they could be included as part of the 'Surface and ground water' priority. Furthermore, ground and surface water chemistry and hydrology represents multiple fields of study with a vast range of characterization options among them. Of these options, the large-scale impacts of draining a region populated primarily by pristine wetlands should be a core consideration (1). The development of resource extraction is also linked to increased concentrations of methyl and total mercury in aquatic systems, particularly if wetland systems are used as polishing ponds for waste products (2). Given these known concerns, clarifying language that explicitly identifies these aspects of water characterization would signal their importance in this assessment.</p> <p>References: 1. Whittington et al., (2013) Effects of mine dewatering on the peatlands of James Bay Lowlands – the role of sediments on mitigating peatland drainage. <i>Hydrological Processes</i>. DOI: 10.1002/hyp.9858 2. McCarter et al., (2017) Nutrient and mercury transport in a sub-arctic ladder fen peatland subjected to simulated wastewater discharges. DOI:10.1016/j.scitotenv.2017.07.225</p>	<p>Consider including and clarifying if this assessment priority will include the following:</p> <ul style="list-style-type: none"> o Addition of suspended solids resulting in changes in water odor, color, or taste o Decreased water levels affecting temperature, chemistry, turbidity, or flow o changes to pH or dissolved oxygen levels o Contamination of water bodies o Spikes in water volume flows o Hydrology disruption (drunken forests) o Change in peatland Hydrology o Fish health and Fish habitat (benthic invertebrate and sediment quality) o water quality impacts, including but not limited to methyl- and total mercury o water quantity, including but not limited to drainage impacts on regional hydrology

Attachment 1 - Comments on the draft Agreement to Conduct a Regional Assessment in the Ring of Fire Area

No.	Section in the draft Agreement	Comment	Suggestion
19	2.3	Assessment Priority "b) Woodland caribou" is unclear. Suggest clarifications and changes.	Suggest the following: <ul style="list-style-type: none"> - Consider changing caribou to "Maintaining Wildlife system" - Consider revising to consider the impact on other wildlife species, not just caribou - Consider including moose-wolf-caribou-deer habitat-population dynamics and migratory bird species - Consider including and clarifying if the assessment priority includes the following: <ul style="list-style-type: none"> o Wildlife sensory disturbance o Disruption of migratory pathways/movement patterns and use of habitat by fauna o Disturbance to migratory birds nesting sites/eggs o Increased hunting and migratory bird species mortality o Restricted species movement and gene flow o Extirpation or extinction o Cascading impacts on other wildlife o Destruction of wildlife habitat o Reduced habitat diversity
20	2.3	Assessment Priority "c) Physical and cultural heritage" is unclear. Suggest clarifications and changes.	Consider including and suggest clarifying if the assessment priority addresses the following: <ul style="list-style-type: none"> - Number of cultural heritage sites preserved/protected - Being able to pass knowledge and skillset to a younger generation - Ability to organize social and cultural activities related to the land - Ability to perform burial and ceremonial sites
21	2.3	Assessment Priority "d) Current use of lands and resources for traditional purposes by Indigenous peoples" is unclear. Suggest clarifications and changes.	Consider including and suggest clarifying if the assessment priority addresses the following: <ul style="list-style-type: none"> - What "current use of lands and resources by Indigenous people" means - If the use of land for traditional purposes is already accounted for in the 'Physical and Cultural Heritage' priority - Whether and how it includes/considers vegetation, species at risk, etc. Consider the following options: <ul style="list-style-type: none"> - Traditional/Indigenous land and resource utilization - Current use of lands and resources by Indigenous peoples <ul style="list-style-type: none"> o Extent and pattern of country/traditional food harvesting

Attachment 1 - Comments on the draft Agreement to Conduct a Regional Assessment in the Ring of Fire Area

No.	Section in the draft Agreement	Comment	Suggestion
22	2.3	Assessment Priority "e) Economy, employment and business" is unclear. Suggest clarifications and changes.	Considering including and suggest clarifying if the assessment priority addresses the following: <ul style="list-style-type: none"> - Employment <ul style="list-style-type: none"> o The number of residents employed by the resource industry o The number of additional mining-related jobs created o The overall rate of Indigenous workforce participation and unemployment level - Direct/indirect economic benefits <ul style="list-style-type: none"> o The emergence of new locally/Indigenous-owned businesses o Income, e.g., individual or household income distribution before and after the mine o Number of new vehicle registrations - Education & training <ul style="list-style-type: none"> o The percentage of residents and target groups (e.g., women, youth) enrolled and completing training or apprenticeships o Cost of living o Cost of a basket of food for a local household o Regional economic development o Number of Indigenous companies hired for contract work o Number of Indigenous actors involved in product supply chain
23	2.3	Assessment Priority "f) Community health and well-being" is unclear. Suggest clarifications.	Consider if the assessment priorities addresses the following health and socio-economic components: <ul style="list-style-type: none"> - Cultural wellbeing: cultural sovereignty/maintenance; closeness to nature; kinship bonds; livelihoods; protection of traditional rights; recreation; physical strength; relationship building; etc. - Human health: sensory disturbance from levels and times of noise from traffic and equipment; the number of mine-related accidents, worker injury rates; health hazard from emissions (e.g., Human Toxicity Level indicator in life-cycle assessment) - Noise and Air Pollution: construction at mine sites; movement of vehicles carting mine products; movement of new vehicles; flights to and from region - Institutional and Governance aspects: tension and disagreement; disruptions to social and work activities; loss of social license for development; social conflict
24	2.3	Possible gap in the listed Assessment Priorities as they do not currently include "Vegetation community composition and productivity". Including vegetation composition and productivity as an assessment priority is recommended as it represents a foundational component of any ecosystem. The vegetative community regulates basal energy availability within a system via photosynthetic processes (1), as well as structural complexity of a habitat via the diversity of growth forms they build. Shifts in vegetation composition and productivity can be an indicator of ecosystem degradation that triggers the loss of ecologically and culturally important megafauna (ex. caribou) as well as critical ecosystem services (ex. hydrology patterns, carbon cycling). By explicitly considering the impacts of development on the vegetative community, the Regional Assessment is posed to also encompass critical indicators of shifts in habitat quality, biogeochemical cycles, and water chemistry. Reference: 1. Gosz et al. (1978) The flow of energy in a forest ecosystem. Scientific America, https://www.jstor.org/stable/24955662	Consider including a new assessment priority 2.3 g) Vegetation composition and productivity.

Attachment 1 - Comments on the draft Agreement to Conduct a Regional Assessment in the Ring of Fire Area

No.	Section in the draft Agreement	Comment	Suggestion
25	2.3	<p>Possible gap in the listed Assessment Priorities as they do not currently include "Carbon stocks and fluxes". Including "Carbon stocks and fluxes" as an assessment priority is recommended as the broader Hudson Bay Lowlands is host to the world's second largest contiguous peatland, containing ~20% of North America's terrestrial carbon stores. These carbon stores have accrued slowly over the last ~5000 years, rendering the region a hot spot for long-term carbon storage within Canada. Experts globally are advocating that the restoration, maintenance and even expansion of belowground terrestrial carbon stores, like those in the Ring of Fire, will be a requirement for the global community to adhere to the Paris Accord climate change agreement (1, 2). As a result, the Federal Government of Canada is investing up to \$631 million to restore and enhance carbon sequestering systems like wetlands throughout the country (3). Resource development in the Ring of Fire will inherently disturb and degrade the globally significant stores held there directly through physical removal and indirectly through the alteration of hydrologic conditions needed to stabilize the carbon store; however, the extent of these impacts remains unclear. Accordingly, it is critical that the Regional Assessment prioritize characterizing shifts in both carbon stocks and carbon fluxes within the target study region, signalling the federal government is considering the short- and long-term implications of development for Canadians and the global community.</p> <p>References: 1. Harris et al. (2021) The essential carbon service provided by northern peatlands. <i>Frontiers in Ecology and the Environment</i>. https://doi.org/10.1002/fee.2437 2. Goldstein et al. (2020) Protecting irrecoverable carbon in Earth's ecosystems. <i>Nature Climate Change</i>. https://doi.org/10.1038/s41558-020-0738-8 3. Environment and Climate Change Canada (2020) A Healthy Environment and a Healthy Economy. https://www.canada.ca/en/services/environment/weather/climatechange/climate-plan/climate-plan-overview/healthy-environment-healthy-economy.html</p>	Consider including a new assessment priority 2.3 g) Carbon Stocks and fluxes.
26	2.3	<p>Possible gap in the listed Assessment Priorities as "Wetlands structure and function" is not its own assessment priority.</p> <p>The landscape of the Hudson Bay Lowlands is comprised of ~90% wetland systems, primarily a complex assemblage of fen and bog systems (1). These wetlands provide a suite of ecosystem services that characterize the region (ex. carbon sequestration, flood management, summer nesting grounds, megafauna foraging sites, berry provisioning etc.). Given that an overwhelming majority of the landscape is comprised of wetland systems, there is a need to assess impacts of development specifically through this lens.</p> <p>Reference: 1. Riley (2011) Wetlands of the Ontario Hudson Bay Lowland: A Regional Overview. Nature Conservatory of Canada, Toronto, ON.</p>	Consider have the following separate assessment priority 2.3 g) Wetland Structure and Function.

Attachment 1 - Comments on the draft Agreement to Conduct a Regional Assessment in the Ring of Fire Area

No.	Section in the draft Agreement	Comment	Suggestion
27	2.3	<p>Possible gap in the listed Assessment Priorities as "Cumulative impacts on climate change and development on ecological systems" is not its own assessment priority. The Ring of Fire region is dominated by wetland systems that have complex adaptive responses to disturbances (1). These adaptive feedbacks make these ecological systems highly resilient to disturbances, allowing some assemblages to be maintained on the landscape for thousands of years under historical environmental conditions. As a result, adaptive systems often have non-linear and abrupt responses to cumulative disturbances as the stabilizing feedbacks that maintain them are degraded (2). Due to this adaptive nature, the wetland systems in the Ring of Fire region may be relatively resilient to the individual impacts of either ongoing climate change or resource extraction, but the combined impacts of both disturbances may elicit much greater damage.</p> <p>References: 1. Dise (2009) Peatland response to global change. <i>Science</i>. DOI: 10.1126/science.1174268 2. Belyea (2009) Nonlinear dynamics of peatlands and potential feedbacks on the climate system, <i>Geophysical Monograph Series</i>. DOI:10.1029/2008GM000829</p>	Consider including a new assessment priority 2.3 g) Cumulative impacts of climate change and development on ecological systems.
28	2.4	It is unclear whether current environmental, health, cultural, social and economic conditions refers to baseline conditions.	Clarify if the term in this context refers to baseline conditions, and suggest reviewing this research paper: Bruce Kilgour. A new approach for defining reference conditions in streams. 2005.
29	2.4 & A1.2	Description of 'Study Area' is vague and the factors are very diverse (environmental, health, cultural etc.). It would be difficult, or near impossible, to study them in "one area". For example, studying the ecology of peatlands needs to be performed in peatlands, but health, social, cultural conditions probably need to be assessed in the communities.	Consider providing more information on Study Areas, including how they will be defined in Appendix A1.2. E.g., Why would there be more than one study area? Will a study area have a specific focus? How are the boundaries of the study area determined? What makes it different from the Assessment Area?
30	3.0 & 6.0	Potential gap for the Committee members and the Indigenous Talking Sharing Circle is the lack of mention of engaging with Indigenous groups in other regions of Canada where mining has taken place to gather their insights of negative and positive effects of mining in their region and lessons learned.	Considering clarifying if and how the Committee members and Indigenous Talking Sharing Circle could engage with Indigenous groups in other regions of Canada where mining has taken place to gather insights and lessons learned.
31	3.3	Unclear if there are provisions in the Terms of Reference for Indigenous representation on the Committee, and whether there will be Indigenous representation on the Committee.	Clarify if there are provisions in the Terms of Reference for Indigenous representation on the Committee, and if there will be Indigenous representation on the Committee.
32	5.7	For this section it is unclear which Indigenous groups will be engaged (reference to Traditional Territory), how often Indigenous groups will be engaged, and how Indigenous input will be solicited.	Suggest providing details on which Indigenous groups will be engaged (reference to Traditional Territory), how often Indigenous groups will be engaged, and how Indigenous input will be solicited in this section; suggest providing a reference to Appendix D.
33	5.8 and 6.0	No mention of the OCAP principles.	Suggest adding a provision on the OCAP principles and consider also including in Appendix B (B1.6 I) and Appendix D.
34	5.9	Unclear which departments, agencies, and ministries of the federal and provincial government are being referred to.	Clarify from which departments, agencies, and ministries of the federal and provincial government the Committee will seek information and advice.
35	5.9 and 5.11	Sections 5.9 and 5.11 pertain to scientific advisory support to the Committee by government departments and agencies. However, it is unclear which departments would be involved or what their scientific expertise might be.	Suggest preparing an appendix to the Agreement that lists the government departments/sectors/branches that will contribute their technical expertise to the Ring of Fire Regional Assessment, as well as the nature of this expertise, in broad terms. This could enhance transparency and public stakeholder confidence in the scientific rigour of the assessment process.
36	5.11	Participation of Government Departments and Agencies: This is already stated above, in section 5.9, and seems redundant here.	Consider revising to reduce repetition.

Attachment 1 - Comments on the draft Agreement to Conduct a Regional Assessment in the Ring of Fire Area

No.	Section in the draft Agreement	Comment	Suggestion
37	5.11	This section states, "...federal authorities and provincial authorities having specialist or expert information or knowledge with respect to the Regional Assessment may be required to make that information or knowledge available to the Committee in an acceptable manner..." It is unclear what constitutes an acceptable manner and the process by which information and knowledge will be provided to the Committee.	Clarify what constitutes an acceptable manner and provide information on the process to make information or knowledge available to the Committee.
38	7.1	Unclear what the time frame of "regular" is.	Clarify what the time frame of "regular" is.
39	7.5	This section states: "The Committee will make its draft Report available for an Indigenous and public review and comment period, including review by Indigenous peoples, and will advise the public that the draft Report is available on the Canadian Impact Assessment Registry Internet site." The text "including review by Indigenous peoples", is repetitive. In addition, there is no mention of how the draft report will be provided to Indigenous groups.	Suggest removing the text, "including review by Indigenous peoples" and revising to say, "The Committee will make its draft Report available to Indigenous groups and the public for review...". Consider also adding text on how the final report will be distributed to Indigenous groups to ensure meaningful participation.
40	7.6	18 months from Committee appointment to the final report does not provide a lot of time to conduct the Regional Assessment and allow review by all stakeholders.	Consider including provisions that will enable changes to the timeline.
41	7.6	The Agreement only provides a timeline for when the Committee will submit its final Report to the Ministers. It is unclear how much time will be dedicated to conducting the Regional Assessment compared to writing the report.	Consider including separate timelines for the conduct of the Regional Assessment and the writing of the report.
42	11	Unclear how this Agreement will be implemented and used by the stakeholders involved; e.g., what kind of obligations will the Regional Assessment pose to industry developers?	Considering adding a summary/conclusion paragraph explaining the application and use of the Regional Assessment after it is completed.
43	A1.1	There is a lack of text describing plans for how the "Assessment Area" can be assessed given how logistically difficult and costly it is to access.	Consider providing text addressing difficult logistics associated with accessing the "Assessment Area".
44	Appendix A, Figures 1 & 2	Figures 1 and 2 state that the mining claims data are current as of October 2020.	Suggest updating the mining claims data to provide the most recent accuracy (with a date in late 2021 or early 2022). Also consider adding the most recent mining leases data, as most of the future mine development occurs within the area in Figure 1 just below the 'e' in the Ring of Fire label. Consider providing a summary of the number of claims in the area so that the reader has an idea of what is being considered/assessed in the Regional Assessment.
45	Appendix A, Figure 1	Figure 1 lacks information on past, present and future mine projects in the area, such as the Victor Diamond Mine.	Consider revising the map in Figure 1 to show relevant mine locations where Impact Assessments may inform the Regional Assessment. In addition, consider showing the outlines of the Attawapiskat and Ekwan River watersheds.
46	Appendix A, Figure 2	Figure 2 shows a detailed geological map of the "Assessment Area" overlain by mineral claim locations. This map is overly technical and may not be appropriate for some stakeholders.	Consider revising the map in Figure 2 by removing faults and lumping rock types into a smaller number of classes, for example, Precambrian igneous rocks, Precambrian volcanic rocks and Paleozoic sedimentary rocks. Consider removing mining claims data in Figure 2 and adding a new figure that displays the mining claims data to improve the visualization of geologic information in Figure 2.
47	Appendix A, Figure 2	Mining leases are not shown on the map.	Consider adding the mining leases data to Figure 2 or a new figure that just shows the mining claims and leases data, as per comment above.
48	A1.2	The Agreement does not mention whether a map will be provided that outlines the study areas.	Clarify whether a map outlining the Study Areas will be developed once defined by the Committee.
49	B1.2	The terms of reference indicates the Committee will receive information, without indicating any next steps.	Consider expanding in the terms of reference on the next steps.
50	B1.5 & B1.6 l)	Unclear how confidential information will be preserved if the final report and its sources will be made available to public.	Clarify how confidential information will be preserved, considering the final report and its sources will be made available to public. Consider linking to the OCAP principles as per comment #33.
51	B1.6 b)	The last paragraph states that an Indigenous Participation Plan will be developed based on advice from 'advisory supports', as referred to in Section 5.0, if these supports are in place at the time.	Clarify what input would be used to develop the Indigenous Participation Plan if these advisory supports are not in place at that time.
52	B1.6 d)	"Identification of Information and Knowledge Gaps" should come before the "Description of Existing Conditions".	Consider changing the order such that information and knowledge gaps comes first.
53	B1.6 i)	This section refers to Canada's climate change obligations but does not mention Canada's 2030 Agenda National Strategy toward Sustainability and Canada's zero emission plans.	Consider adding a reference to Canada's 2030 Agenda National Strategy toward Sustainability and Canada's zero emission plans here.

Attachment 1 - Comments on the draft Agreement to Conduct a Regional Assessment in the Ring of Fire Area

No.	Section in the draft Agreement	Comment	Suggestion
54	B1.6 n)	Unclear what "regular" means for providing status reports to Ministers.	Consider clarifying what "regular" means for providing status reports to Ministers.
55	B2.2 b)	The GIS product in the Regional Assessment of Offshore Oil and Gas Exploratory Drilling East of Newfoundland and Labrador could not be integrated into the Federal Geospatial Platform (FGP) and Open Science and Data Platform (OSDP). An objective of this Regional Assessment could be to ensure that any map-related outputs of the Regional Assessment can be integrated into the FGP/OSDP to support public access to cumulative effects information.	Consider revising the text in B2.2 b) to: "...This description will be presented in a manner to be determined by the Committee, which, in addition to the Committee's Report, may include information in an electronic format (such as through a geospatial Web application) that is based on the Open Geospatial Consortium's standards and interoperable with the Open Science and Data Platform."
56	B2.3 b)	The development of a high-level, generic description of potential mining activities in the area would require a significant amount of information, which may not be available or accurate.	Suggest clarifying approach to identify level of detail for describing future mining activities.