

February 6, 2026

Regional Assessment in the Ring of Fire Area
Impact Assessment Agency of Canada

Re: Response to the Interim Report Regional Assessment in the Ring of Fire area

Regional Assessment Working Group and Impact Assessment Agency of Canada,

I am writing to acknowledge and respond to the important work undertaken by the Regional Assessment Working Group (RAWG) on the Interim Report, a co-led process. However, it is worth noting that no community updates or meaningful community engagement were undertaken before or during the development of the Interim Report. I have been present in the community throughout 2025.

In this context, I offer the following comments in the spirit of strengthening the Final Regional Assessment and ensuring it serves as a practical and durable tool for the protection of First Nations' rights, community well-being, and the lands and waters of Kattawapiskak Aski.

Treaty No. 9 Implications

The Ring of Fire is located entirely within Treaty No. 9 territory. As such, the Regional Assessment must be firmly grounded in the Treaty understanding, relationship and obligations. Treaty No. 9 is not a historical document, but a living, binding agreement that affirms the continued rights of the Treaty to hunt, fish, trap, travel, and live accordingly across Kattawapiskak Aski.

Many Treaty No. 9 First Nations, including Attawapiskat, maintain that the Treaty was understood as an agreement to share the land, not to surrender it or consent to large-scale resource development that would undermine our way of life and responsibilities. This understanding must meaningfully inform how cumulative effects, development scenarios, and limits of acceptable change are defined in the Final Regional Assessment.

While the Interim Report references Indigenous rights and values, it does not yet clearly articulate how Treaty No. 9 rights will operate as substantive constraints on development. The Final Report must explicitly recognize that:

- Impacts that meaningfully impair the exercise of Treaty No. 9 rights are unacceptable, regardless of proposed mitigation, offsetting, or economic benefit;
- Cumulative effects must be assessed at a regional scale in relation to the continued ability of Treaty rights-holders to live on and from the land;
- Some areas, relationships, and values are fundamentally incompatible with industrial development and must be treated as non-negotiable limits or “red lines.”

A Treaty-respecting Regional Assessment must move beyond procedural consultation and ensure that treaty rights, as outlined in Treaty No. 9, meaningfully shape outcomes, including decisions to constrain or refuse development. This requires Indigenous-led assessment, monitoring, and governance mechanisms, as well as alignment with the honour of the Crown and the principles of free, prior, and informed consent.

Gaps Require Attention in the Final Report

While the Interim Report is strong as a process and values document, several critical elements will need to be strengthened for the Final Report to effectively inform decision-making:

Clear Implications for Decision-Making

The Interim Report does not yet clearly articulate how the assessment findings should be applied in future regulatory, policy, or project-level decisions. The Final Report should explicitly describe:

- What types of development are fundamentally incompatible with community priorities?
- What conditions must be met before any development is considered?

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- How the Regional Assessment should be used to screen, constrain, or refuse future projects.

Defined Limits, Thresholds, and “Red Lines”

Cumulative effects are described conceptually, but the report does not yet identify cultural, environmental, social, or health thresholds beyond which impacts become unacceptable. The Final Report should:

- Identify community-defined limits of acceptable change, including qualitative thresholds where quantitative data is unavailable;
- Clearly state that some impacts are non-negotiable and cannot be offset or mitigated.

More Concrete Development Scenarios

Development scenarios remain high-level and conceptual. To support meaningful analysis, the Final Report should:

- Clearly define and name a limited number of plausible scenarios (including a no-new-infrastructure scenario);
- Explicitly address infrastructure-led development as a primary driver of cumulative effects;
- Include failure and accident scenarios, particularly given the sensitivity of peatlands, permafrost, and hydrology.

Climate Change as a Structuring Driver

Climate change is acknowledged but not yet fully integrated as a primary driver shaping feasibility, risk, and cumulative effects. The Final Report should treat climate change as a cross-cutting condition that fundamentally affects infrastructure viability, environmental integrity, and emergency response capacity.

Governance and Implementation Pathways

The Interim Report raises important governance questions but does not yet present clear options. The Final Report should outline potential governance models and clarify:

- Roles and responsibilities across First Nations, federal, and provincial governments;
- How limits and thresholds will be enforced;
- How monitoring results will trigger adaptive management or intervention.

Recommendations for the Final Report

To strengthen the Final Regional Assessment, we recommend:

- Including a concise “Implications for Decision-Makers” section summarizing enforceable conclusions;
- Clearly articulating regional limits and precautionary principles;
- Advancing development scenarios into practical analytical tools;
- Elevating climate change as a central organizing lens; and
- Providing concrete recommendations for governance, monitoring, and accountability.

In closing, I recognize that the Interim Report is not intended to be a final report. As a rights-holder, I offer these comments in support of the RAWG’s stated objective that this Regional Assessment must not “sit on a shelf,” but instead meaningfully inform decisions that affect present and future generations.

At every stage, it is important to meet with and meaningfully engage members of Attawapiskat and other Treaty No. 9 rights-holders, recognizing that their knowledge is as vital as Western knowledge.

Thank you,

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