

TIMISKAMING FIRST NATION

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General comments from Timiskaming First Nation

The Timiskaming First Nation (TFN) wants to reiterate that participating in the process of commenting on documentation from the Impact Assessment Agency of Canada does not mean that in any way that TFN agrees with the timeframe or budget that the Federal government has provided. Both are inadequate in terms of allowing for meaningful review of the impact assessment of the Wasamac Gold Mine Project.

Specific comments from Timiskaming First Nation

Document: Tailored Impact Statement Guidelines

Section 6. Description of Engagement With Indigenous Peoples

- collect available Indigenous knowledge and expertise and integrate it into its Impact Statement, just as it integrates scientific knowledge;

Comments: TFN wants to conduct our own collection of knowledge and expertise for the impact statement.

- share project information frequently and transparently with Indigenous peoples;

Comments: TFN requires all digital data regarding the project be sent to its natural resources office in a timely a manner.

- support the participation of Indigenous peoples in the completion of the Impact Statement, which could include funding studies conducted by Indigenous peoples who will have demonstrated interest in this regard;

Comments: TFN wants to conduct its own collection of knowledge and expertise for the impact statement. All that work should be funded by the proponent.

- cooperate with Indigenous peoples to identify preferred mitigation measures to eliminate, reduce, limit or offset the project's adverse effects on VCs and on their rights, as well as to optimize the project's benefits for their communities; and

Comments: The cooperation should not be done with individuals or families but through the natural resources office in collaboration with TFN chief and council

- conduct a preliminary assessment of potential effects on the rights of Indigenous peoples that cannot be mitigated. The proponent is not responsible for evaluating the severity of these effects, but is responsible for discussing them with the Indigenous peoples consulted about the project and giving Indigenous peoples the opportunity to draw their own preliminary conclusions in the Impact Statement, if they so choose, at this stage of the impact assessment process.

Comments: TFN is officially asking to do its own preliminary assessment in the impact statement

Section 7 Baseline conditions

The information describing the baseline conditions may be collected in a stand-alone chapter in the Impact Statement or integrated into the sections dealing with the relevant valued components (VC), including the assessment of the effects of each VC and the interactions between the VCs, the identification of mitigation measures, the residual effects analysis and the cumulative effects assessment.

Comments: TFN wants to conduct our own study on baseline conditions, relevant valued components (VC), including the assessment of the effects of each VC and the interactions between the VCs, the identification of mitigation measures, the residual effects analysis and the cumulative effects assessment.

7.4. Spatial and Temporal Boundaries

The spatial and temporal boundaries determined and established for the impact assessment will vary depending on the VC and should be considered separately for each VC.

Comments: TFN will be defining its own spatial and temporal boundaries for the VC determined by the community

Document : Draft Indigenous engagement plan

3.2 "Decisions related to the Project are informed by the comments of Indigenous peoples on the concept of sustainability; Decisions related to the Project are informed by concerns and

values of Indigenous peoples; Decisions related to the Project are informed by the Indigenous knowledge shared through this process; “

Comment: We would like to include decisions informed by the knowledge that everything in nature is connected.

Page 20. The Agency requires the proponent to work with Indigenous peoples to enable them to gather and promote Indigenous knowledge and to consider it on an equal footing with scientific knowledge in the preparation of its Impact Statement.

Comment: I would not use the word promote but rather to incorporate indigenous knowledge.