

PADCOM Potash Solution Mining Project

Summary of Métis Knowledge, Land Use, and Occupancy near the Proposed PADCOM Potash Solution Mining Project

Manitoba Métis Federation

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1.0 Introduction

The Potash and Agri Development Corporation of Manitoba (PADCOM) Ltd. is proposing to construct and operate a mining project for the extraction and processing of potash. This project, PADCOM Potash Solutions Mining Project, is being proposed in the Hamlet of Harrowby, approximately 16 kilometers west of Russell Manitoba in the Manitoba Métis Federation Southwest Region and just south of the Manitoba Métis Federation Northwest Region. This area falls within the Recognized Métis Harvesting Area (RMHA), also referred to as the Métis Natural Resource Harvesting Zone, where the Red River Métis have recognized and collectively held Métis Harvesting Rights.

On November 16th, 2021, the Minister of Environment and Climate Change received a request to designate the project under the Impact Assessment Act. The Impact Assessment Agency of Canada (IAAC) is currently conducting an analysis to make a recommendation on the designation of the project. The IAAC has requested comment from the MMF on this matter, this memo is in response to that request.

The COVID-19 pandemic is restricting the ability of the MMF to organize community consultation meetings. In addition, the limited funding available and short timeline for the request for comment has made consulting with Métis citizens impossible. This memo outlines what we know about where and how our citizens are harvesting and using the lands and waters in the proposed area. It should not be considered a comprehensive response to potential impacts the project may have on Métis Rights and interests. Further consultation and engagement are needed to fully assess the implications this project may have on Métis citizens ability to harvest and otherwise use the lands in the area.

The information provided in this report includes sensitive information shared with the MMF by our Métis citizens, with the understanding that it would be kept confidential and would not be disclosed other than by the MMF. Our citizens have entrusted the MMF, as their democratically elected Métis Government, to safeguard and appropriately use this information on their behalf. The information provided in this report is the property of the MMF and cannot be duplicated or distributed without the MMF's written consent. The information described within this report is considered "high level," i.e., it is based on the data that was available at the time of writing and should be considered a very partial overview of the Red River Métis' overall land and resources use and historic or current occupancy of the area around the proposed project area.



2.0 Review Methodology

Since 2003, the MMF has completed many Métis Land Use and Occupancy studies with Métis citizens across Manitoba. These studies have provided the MMF with a data catalogue showing the land use and occupancy sites of hundreds of Métis citizens. The MMF continually adds to this database and uses it to look at how and where resource developments may impact the Rights and interest of Métis citizens.

Our Métis Knowledge studies are conducted using a rigorous, legally defensible methodology known as land use and occupancy mapping. These studies involve a desktop mapping exercise with individual Métis citizens and an interview that asks the land users to share their Oral History and give their opinions on a specific project development. The data we collect is not comprehensive of all Métis Knowledge in an area. This is because we have not yet had the capacity to interview the entire population of Métis land users and because each interview is only a couple hours long, making it impossible to map each person's entire lifetime of knowledge in that time frame. For this reason, the information in the data catalogue should be thought of as a snapshot of some Métis citizens' knowledge in the area.

Funding did not allow for additional mapping interviews to be completed for this Project. Instead, we reviewed the data catalogue to determine whether the proposed project area would intersect with already identified Métis Land Use and Occupancy Sites. The review was completed by Shared Value Solutions Ltd. (SVS) on behalf of the MMF. To complete this analysis, the proposed project site area was overlaid on the MMF's existing GIS database of previously collected Métis Knowledge, land use, and occupancy for the area. While that data was not collected specifically to inform the proposed potash mine, it is a useful starting point to begin to understand the Red River Métis' Rights, interests, and values in the Project area. The data indicated that there is current and historic Métis land use and occupancy within the area.

3.0 Red River Métis (Manitoba Métis)

3.1 History and Identity

The Red River Métis —as a distinct Indigenous people—evolved out of relations between European men and First Nations women who were brought together as a result of the early fur trade in the Northwest. In the eighteenth century, both the Hudson Bay Company and the Northwest Company created a series of trading posts that stretched across the upper Great Lakes, through the western plains, and into the northern boreal forest. These posts and fur trade activities brought European and Indigenous peoples into contact. Inevitably, unions between European men—explorers, fur traders, and pioneers—and Indigenous women were consummated. The children of these families developed their own collective identity and political community so that “[w]thin a few generations, the descendants of these unions developed a culture distinct from their European and Indian forebears” and the Métis Nation was born—a new people, indigenous to the western territories (*Alberta (Aboriginal Affairs and Northern*



Development) v. Cunningham, [2011] 2 SCR 670 at para. 5; 2008 MBPC R. v. *Goodon*, 59 at para. 25; *Manitoba Métis Federation Inc. v. Canada (Attorney General)*, [2013] 1 SCR 623 at para. 2).

The Métis led a mixed way of life. “In early times, the Métis were mostly nomadic. Later, they established permanent settlements centered on hunting, trading, and agriculture” (*Alberta v. Cunningham*, at para. 5). The Métis were employed by both of the fur trades’ major players, the Hudson’s Bay and Northwest companies. By the early 19th century, they had become a major component of both firms’ workforces. At the same time, however, the Métis became extensively involved in the buffalo hunt. As a people, their economy was diverse; combining as it did, living off the land in the Aboriginal fashion with wage labour (*MMF v. Canada*, at para. 29).

It was in the Red River, in reaction to a new wave of European immigration, that the Métis Nation first came into its own. Since the early 1800s, the Manitoba Métis — as a part of the larger Métis Nation—has asserted itself as a distinct Indigenous collective with rights and interests in its Homeland. The Manitoba Métis share a language (Michif), national symbols (infinity flags), culture (i.e., music, dance, dress, crafts), as well as a special relationship with its territory that is centered in Manitoba and extends beyond the present-day provincial boundaries.

The Manitoba Métis has been confirmed by the courts as being a distinctive Indigenous community, with rights that are recognized and affirmed in section 35 of the *Constitution Act, 1982*. In *R. v. Goodon*, the Manitoba court held that:

The Métis community of Western Canada has its own distinctive identity [...] the Métis created a large inter-related community that included numerous settlements located in present-day southwestern Manitoba, into Saskatchewan and including the northern Midwest United States. This area was one community [...] The Métis community today in Manitoba is a well-organized and vibrant community (paras. 46-47; 52).

This proud independent Métis population constituted a historic rights-bearing community in present day Manitoba and beyond, which encompassed “all of the area within the present boundaries of southern Manitoba from the present-day City of Winnipeg and extending south to the United States” (para. 48).

The heart of the historic rights-bearing Métis community in southern Manitoba was the Red River Settlement; however, the Manitoba Métis also developed other settlements and relied on various locations along strategic fur trade routes. During the early part of the 19th century, these included various posts of varying size and scale spanning the Northwest Company and the Hudson Bay Company collection and distribution networks.

More specifically, in relation to the emergence of the Métis—as a distinct Indigenous Nation in Manitoba—the Supreme Court of Canada wrote the following in the *MMF v. Canada* case:

“[21] The story begins with the Aboriginal peoples who inhabited what is now the province of Manitoba—the Cree and other less populous nations. In the late 17th century,



European adventurers and explorers passed through. The lands were claimed nominally by England which granted the Hudson's Bay Company, a company of fur traders' operation of out London, control over a vast territory called Rupert's Land, which included modern Manitoba. Aboriginal peoples continued to occupy the territory. In addition to the original First Nations, a new Aboriginal group, the Métis, arose—people descended from early unions between European adventurers and traders, and Aboriginal women. In the early days, the descendants of English-speaking parents were referred to as half-breeds, while those with French roots were called Métis.

[22] A large—by the standards of the time—settlement developed at the forks of the Red and Assiniboine Rivers on land granted to Lord Selkirk by the Hudson's Bay Company in 1811. By 1869, the settlement consisted of 12,000 people, under the governance of Hudson's Bay Company.

[23] In 1869, the Red River Settlement was a vibrant community, with a free enterprise system and established judicial and civic institutions, centred on the retail stores, hotels, trading undertakings and saloons of what is now downtown Winnipeg. The Métis were the dominant demographic group in the Settlement, comprising around 85 percent of the population [approximately 10,000 Métis], and held leadership positions in business, church and government.”

The fur trade was vital to the ethnogenesis of the Métis Nation and was active in Manitoba from at least the late 1770s, and numerous posts and outposts were established along cart trails and waterways throughout the province. These trails and waterways were crucial transportation networks for the fur trade (Jones 2014; 2) and were the foundation of the Manitoba Métis' extensive use of the lands and waters throughout the province. In the early 20th century, the Manitoba Métis continued to significantly participate in the commercial fisheries and in trapping activities, which is well documented in Provincial government records.



3.2 Manitoba Métis Federation

On July 6, 2021, Canada and the MMF signed the Manitoba Métis Self-Government Recognition and Implementation Agreement which is the first agreement to give immediate recognition to an existing Métis government, namely, the Manitoba Métis Federation, which is the existing democratically elected government of the Manitoba Métis – also known as the Red River Métis. This Agreement will be followed by a Treaty between the MMF and Canada and ensures that the MMF will continue to provide responsible and accountable self-government.

The MMF is the democratically elected government of the Manitoba Métis. The MMF is duly authorized by the Citizens of the Manitoba Métis for the purposes of dealing with their collective Métis rights, claims, and interests, including conducting consultations and negotiating accommodations (as per MMF Resolution No. 8). While the MMF was initially formed in 1967, its origins lie in the 18th century with the birth of the Manitoba Métis and in the legal and political structures that developed with it. Since the birth of the Métis people in the Red River Valley, the Manitoba Métis—as a part of the larger Métis Nation—has asserted and exercised its inherent right of self-government. For the last 50 years, the MMF has represented the Manitoba Métis at the provincial and national levels.

During this same period, the MMF has built a sophisticated, democratic, and effective Métis governance structure that represents the Manitoba Métis at the local, regional, and provincial levels throughout Manitoba. The MMF was created to be the self-government representative of the Manitoba Métis—as reflected in the Preamble of the MMF’s Constitution (also known as the MMF Bylaws):

“WHEREAS, the Manitoba Métis Federation Inc. has been created to be the democratic and self-governing representative body of the Manitoba Métis.”

In addition, the purpose “to provide responsible and accountable governance on behalf of the Manitoba Métis using the constitutional authorities delegated by its citizens” is embedded within the MMF’s objectives, as set out in the MMF Constitution as follows:

“To promote and instill pride in the history and culture of the Métis people.

To educate members with respect to their legal, political, social, and other rights.

To promote the participation and representation of the Métis people in key political and economic bodies and organizations.

To promote the political, legal, social, and economic interests and rights of its citizens.

To provide responsible and accountable governance on behalf of the Manitoba Métis community using the constitutional authorities delegated by its members.”



The MMF is organized and operated based on centralized democratic principles, some key aspects of which are described below.

President: The President is the leader and spokesperson of the MMF. The President is elected in a province-wide ballot-box election every four years and is responsible for overseeing the day-to-day operations of the MMF.

Cabinet: The MMF Cabinet leads, manages, and guides the policies, objectives, and strategic direction of the MMF and its subsidiaries. All 23 Cabinet members are democratically elected by Manitoba Métis Citizens.

Regions: The MMF is organized into seven regional associations or "Regions" throughout the province (Figure 2): The Southeast Region, the Winnipeg Region, the Southwest Region, the Interlake Region, the Northwest Region, the Pas Region, and the Thompson Region. Each Region is administered by a Vice-President and two executive officers, all of whom sit on the MMF's Cabinet. Each Region has an office which delivers programs and services to their specific geographic area.

Locals: Within each Region are various area-specific "Locals" which are administered by a chairperson, a vice-chairperson and a secretary-treasurer. Locals must have at least nine citizens and meet at least four times a year to remain active. There are approximately 140 MMF Locals across Manitoba.

While the MMF has created an effective governance structure to represent the Manitoba Métis at the local, regional, and provincial levels, it is important to bear in mind that there is only one large, geographically dispersed, Manitoba Métis. Manitoba Métis Citizens live, work and exercise their section 35 rights throughout and beyond the province of Manitoba.

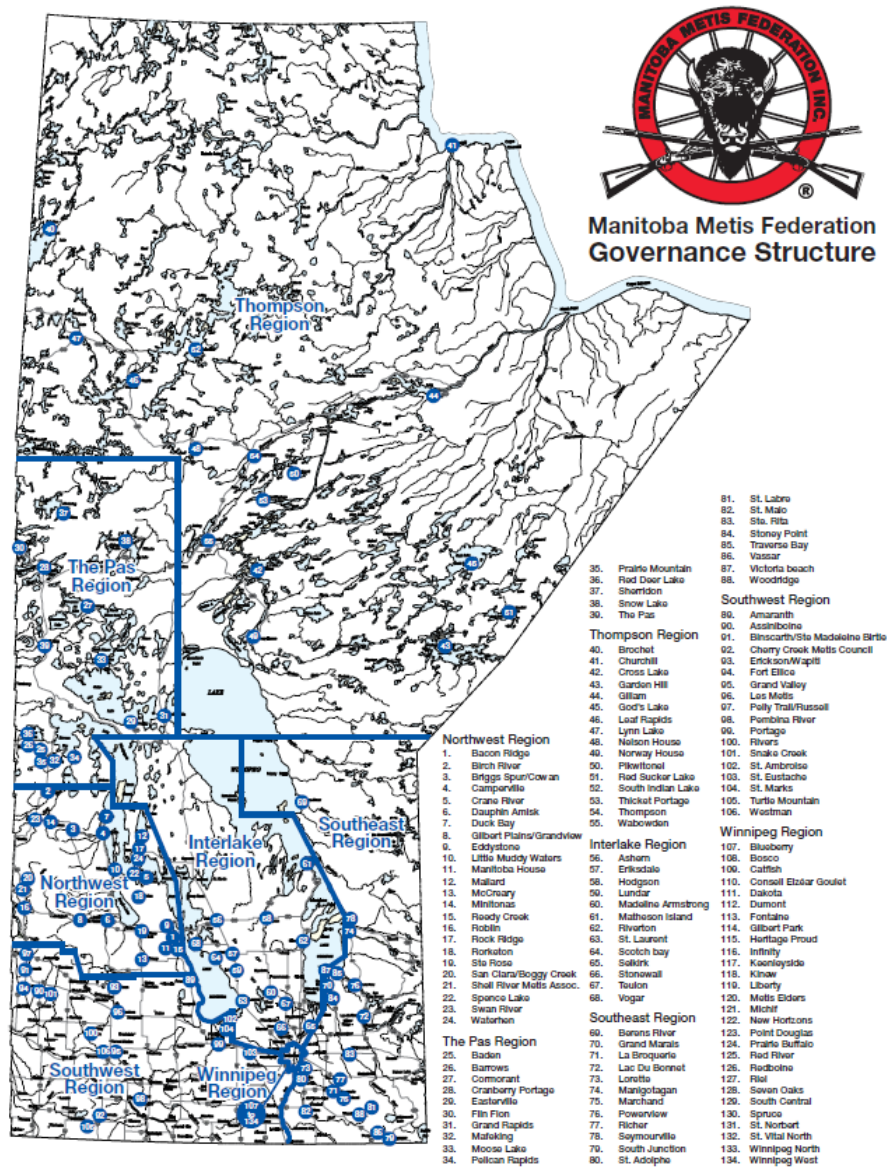


Figure 2 Manitoba Métis Federation (MMF) Regions



3.3 MMF Resolution No. 8

Among its many responsibilities, the MMF is authorized to protect the Aboriginal rights, claims, and interests of the Manitoba Métis, including those related to harvesting, traditional culture, and economic development, among others.

In 2007, the MMF Annual General Assembly unanimously adopted Resolution No. 8 that sets out the framework for engagement, consultation, and accommodation to be followed by Federal and Provincial governments, industry, and others when making decisions and developing plans and projects that may impact the Manitoba Métis. Under MMF Resolution No. 8, direction has been provided by the Manitoba Métis for the MMF Home Office to take the lead and be the main contact on all consultation undertaken with the Manitoba Métis. Resolution No. 8 reads, in part that:

...this assembly continue[s] to give the direction to the Provincial Home Office to take the lead and be the main contact on all consultations affecting the Métis community and to work closely with the Regions and Locals to ensure governments and industry abide by environmental and constitutional obligations to the Métis...

The MMF Home Office works closely with the Regions and Locals to ensure the rights, interests, and perspective of the Manitoba Métis are effectively represented in matters related to consultation and accommodation.

Resolution No. 8 has five phases:

- Phase 1: Notice and Response
- Phase 2: Funding and Capacity
- Phase 3: Engagement or Consultation
- Phase 4: Partnership and Accommodation
- Phase 5: Implementation

Each phase is an integral part of the Resolution No. 8 framework and proceeds logically through the stages of consultation.

3.4 Manitoba Métis Rights, Claims, and Interests

The Manitoba Métis possess Aboriginal rights, including pre-existing Aboriginal collective rights and interests in lands recognized and affirmed by section 35 of the *Constitution Act, 1982*, throughout Manitoba. The Manitoba court recognized these pre-existing, collectively held Métis rights in *R. v. Goodon* (at paras. 58; 72):

I conclude that there remains a contemporary community in southwest Manitoba that continues many of the traditional practices and customs of the Métis people.

I have determined that the rights-bearing community is an area of southwestern Manitoba that includes the City of Winnipeg south to the U.S. border and west to the Saskatchewan border.



As affirmed by the Supreme Court of Canada, such rights are “recognize[d] as part of the special aboriginal relationship to the land” (*R. v. Powley*, 2003 SCC 43, at para. 50) and are grounded on a “communal Aboriginal interest in the land that is integral to the nature of the Métis distinctive community and their relationship to the land” (*MMF v. Canada*, at para. 5). Importantly, courts have also recognized that Métis harvesting rights may not be limited to Unoccupied Crown Lands (*R. v. Kelley*, 2007 ABQB 41, para. 65).

The Crown, as represented by the Manitoba government, has recognized some aspects of the Manitoba Métis’ harvesting rights through a negotiated agreement: The *MMF-Manitoba Points of Agreement on Métis Harvesting* (2012) (the *MMF-Manitoba Harvesting Agreement*). This Agreement was signed at the MMF’s 44th Annual General Assembly and “recognizes that collectively-held Métis Harvesting Rights, within the meaning of section 35 of the *Constitution Act, 1982*, exist within the [Recognized Métis Harvesting Zone], and that these rights may be exercised by Manitoba Métis Rights Holders consistent with Métis customs, practices and traditions...” (*MMF-Manitoba Harvesting Agreement*, section 1). In particular, the *MMF-Manitoba Harvesting Agreement* recognizes that Métis rights include “hunting, trapping, fishing and gathering for food and domestic use, including for social and ceremonial purposes and for greater certainty, Métis harvesting includes the harvest of timber for domestic purposes” throughout an area spanning approximately 169,584 km² (the “Métis Recognized Harvesting Area”) (*MMF-Manitoba Harvesting Agreement*, section 2; Figure 3). The MMF further asserts rights and interests exist beyond this area, which require consultation and accommodation as well.

Beyond those rights already established through litigation and recognized by agreements, the Manitoba Métis claims commercial and trade-related rights. Courts have noted that Métis claims to commercial

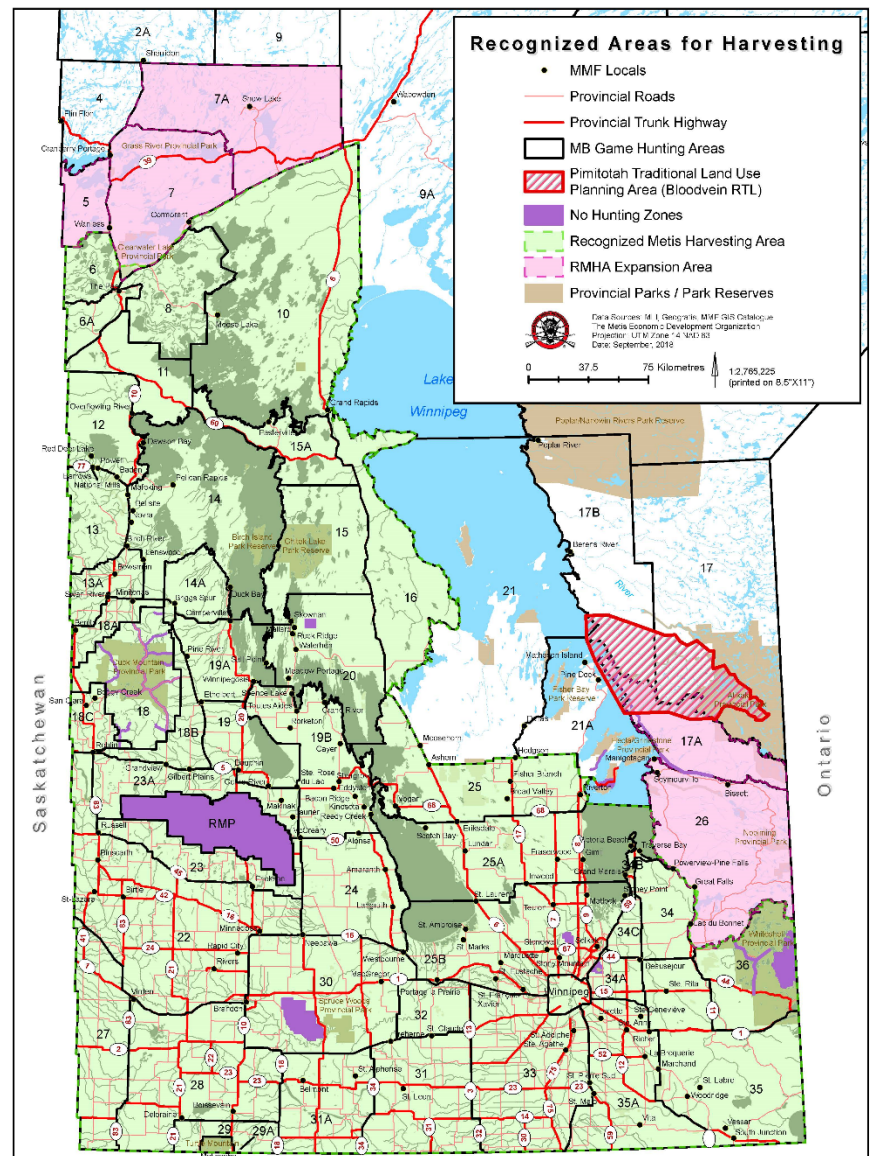


Figure 3 MMF-Manitoba Harvesting Agreement Recognized Manitoba Métis Harvesting Zones



rights remain outstanding (*R. v. Kelley* at para. 65). These claims are strong and well-founded in the historical record and the customs, practices, and traditions of the Manitoba Métis, and it is incumbent on the Crown and Proponents to take them seriously.

As noted above, the Manitoba Métis has its roots in the western fur trade (*R. v. Blais*, 2003 SCC 44 at para. 9 [*Blais*]; *R. v. Goodon* at para. 25). The Manitoba Métis are descendants of early unions between Aboriginal women and European traders (*MMF v. Canada* at para. 21). As a distinct Métis culture developed, the Métis took up trade as a key aspect of their way of life (*R. v. Powley* at para. 10). Many Métis became independent traders, acting as middlemen between First Nations and Europeans (*R. v. Goodon* at para. 30). Others ensured their subsistence and prosperity by trading resources they themselves hunted and gathered (*R. v. Goodon* at para. 31, 33, & 71). By the mid-19th century, the Manitoba Métis had developed the collective feeling that “the soil, the trade and the Government of the country [were] their birth rights.” (*R. v. Goodon* at para. 69(f)). Commerce and trade are, and always have been, integral to the distinctive culture of the Manitoba Métis. Today, the Manitoba Métis have an Aboriginal, constitutionally protected right to continue this trading tradition in modern ways to ensure that their distinct community will not only survive, but also flourish.

Unlike First Nations in Manitoba, whose commercial rights were converted and modified by treaties and the *Natural Resources Transfer Agreement (NRTA)* (*R. v. Horseman*, [1990] 1 SCR 901), the Métis’ pre-existing customs, practices, and traditions—including as they relate to commerce and trade—were not affected by the *NRTA* (*R. v. Blais*) and continue to exist and be protected as Aboriginal rights. First Nations’ treaty rights in Manitoba are, for example, inherently limited by the Crown’s power to take up lands (*Mikisew Cree First Nation v Canada (Minister of Canadian Heritage)*, [2005] 3 SCR 388 at para 56). Métis rights, in contrast, are not tempered by the “taking up” clauses found in historic treaties with First Nations. Métis rights must be respected as they are, distinct from First Nations’ rights and unmodified by legislation or agreements.

In addition to the abovementioned rights to land use that preserve the Métis culture and way of life, the Manitoba Métis have other outstanding land related claims and interests with respect to lands. These include claims related to the federal Crown’s constitutional promise to all Aboriginal peoples, including the Manitoba Métis, as set out in the Order of Her Majesty in Council Admitting Rupert’s Land and the North-Western Territory into the Union (the “1870 Order”) which provides that, upon the transference of the territories in question to the Canadian Government, the claims of the Indian tribes to compensation for lands required for purposes of settlement will be considered and settled in conformity with the equitable principles which have uniformly governed the British Crown in its dealings with the aborigines.

The manner in which the federal Crown implemented this constitutional promise owing to the Manitoba Métis—through the *Dominion Lands Act* and the resulting Métis scrip system—effectively defeated the purpose of the commitment. Accordingly, the MMF claims these federal Crown actions constituted a breach of the honour of the Crown, which demand negotiations and just settlement outside of the ‘old postage stamp province’ within Manitoba as well.

The MMF also claims that the *Dominion Lands Act* and the resulting Métis scrip system were incapable of extinguishing collectively held Métis title in specific locations where the Manitoba Métis are able to meet the legal test for Aboriginal title as set out by the Supreme Court of Canada. These areas in the province, which the Manitoba Métis exclusively occupied—as an Indigenous people—prior to the assertion of sovereignty, establish a pre-existing Métis ownership interest in these lands.



The Manitoba Métis also have an outstanding legal claim within what was the ‘old postage stamp province’ of Manitoba relating to the 1.4 million acres of land promised to the children of the Métis living in the Red River Valley, as enshrined in section 31 of the *Manitoba Act, 1870* (*MMF v. Canada* at para 154).

This land promised was a nation-building, constitutional compact that was meant to secure a “lasting place in the new province [of Manitoba]” for future generations of the Métis people (*MMF v. Canada* at para 5). This “lasting place” was to have been achieved by providing the Manitoba Métis a “head start” in securing lands in the heart of the new province (*MMF v. Canada* at paras 5-6).

Instead, the federal Crown was not diligent in its implementation of section 31, which effectively defeated the purpose of the constitutional compact.

In March 2013, the Supreme Court of Canada found that the federal Crown failed to diligently and purposefully implement the Métis land grant provision set out in section 31 of the *Manitoba Act, 1870* (*MMF v. Canada* at para 154). This constituted a breach of the honour of the Crown. In arriving at this legal conclusion, the Court wrote:

“What is at issue is a constitutional grievance going back almost a century and a half. So long as the issue remains outstanding, the goal of reconciliation and constitutional harmony, recognized in section 35 of the *Constitution Act, 1982* and underlying section 31 of the *Manitoba Act*, remains unachieved. The ongoing rift in the national fabric that section 31 was adopted to cure remains unremedied. The unfinished business of reconciliation of the Métis people with Canadian sovereignty is a matter of national and constitutional import (*MMF v. Canada* at para 140).”

This constitutional breach is an outstanding Métis claim flowing from a judicially recognized common law obligation which burdens the federal Crown (*MMF v. Canada* at paras 156; 212). It can only be resolved through good faith negotiations and a just settlement with the MMF (see for example: *R v Sparrow*, [1990] 1 SCR 1075 at paras 51–53; *R v Van der Peet*, [1996] 2 SCR 507 at paras 229, 253; *Haida* at para 20; *Carrier Sekani* at para 32). Lands both within the ‘old postage stamp province’ as well as in other parts of Manitoba—since little Crown lands remain within the ‘old postage stamp province’—may need to be considered as part of any future negotiations and settlement in fulfillment of the promise of 1.4 million acres, together with appropriate compensation.

On November 15, 2016, the MMF and Canada concluded a *Framework Agreement for Advancing Reconciliation* (the “Framework Agreement”). The Framework Agreement established a negotiation process aimed, among other things, at finding a shared solution regarding the Supreme Court of Canada’s decision in *MMF v. Canada* and advancing the process of reconciliation between the Crown and the Manitoba Métis. It provides for negotiations on various topics including, but not limited to, the “quantum, selection and management of potential settlement lands.” Negotiations under the Framework Agreement are active and ongoing.



4.0 Manitoba Métis Land Use and Occupancy Near the Proposed Project Area

We have assessed our data and prepared a map (Figure 4) that summarizes previously collected land use and occupancy values near to the proposed project area. Métis land users and harvesters interviewed in past studies have identified values on the land that are important to their Métis identity and their connection and use of the MRHA. Participants from previous studies identified 35 land use and occupancy features within 15 km of the proposed project area and an additional 610 features within 100 km surrounding the proposed project area. While the number of features identified is not statistically significant, it does indicate extensive land use and occupancy by Métis citizens in this area. Any change to access or use of the area would have impacts on Métis Rights and interests.

Areas of importance include:

- Personal harvesting areas (fishing, gathering, hunting, and trapping)
- Commercial harvesting areas (commercial trapping and snaring, gathering plants for commercial purposes)
- Cultural sites (burial sites, historically significant sites, contemporary gathering places)
- Occupancy sites (travel routes, cabins, tenting areas, portage routes)
- Areas where Métis Ecological Knowledge is held (important habitat areas, spawning areas, habitat for species at risk, migration routes, salt licks, reptile habitat)



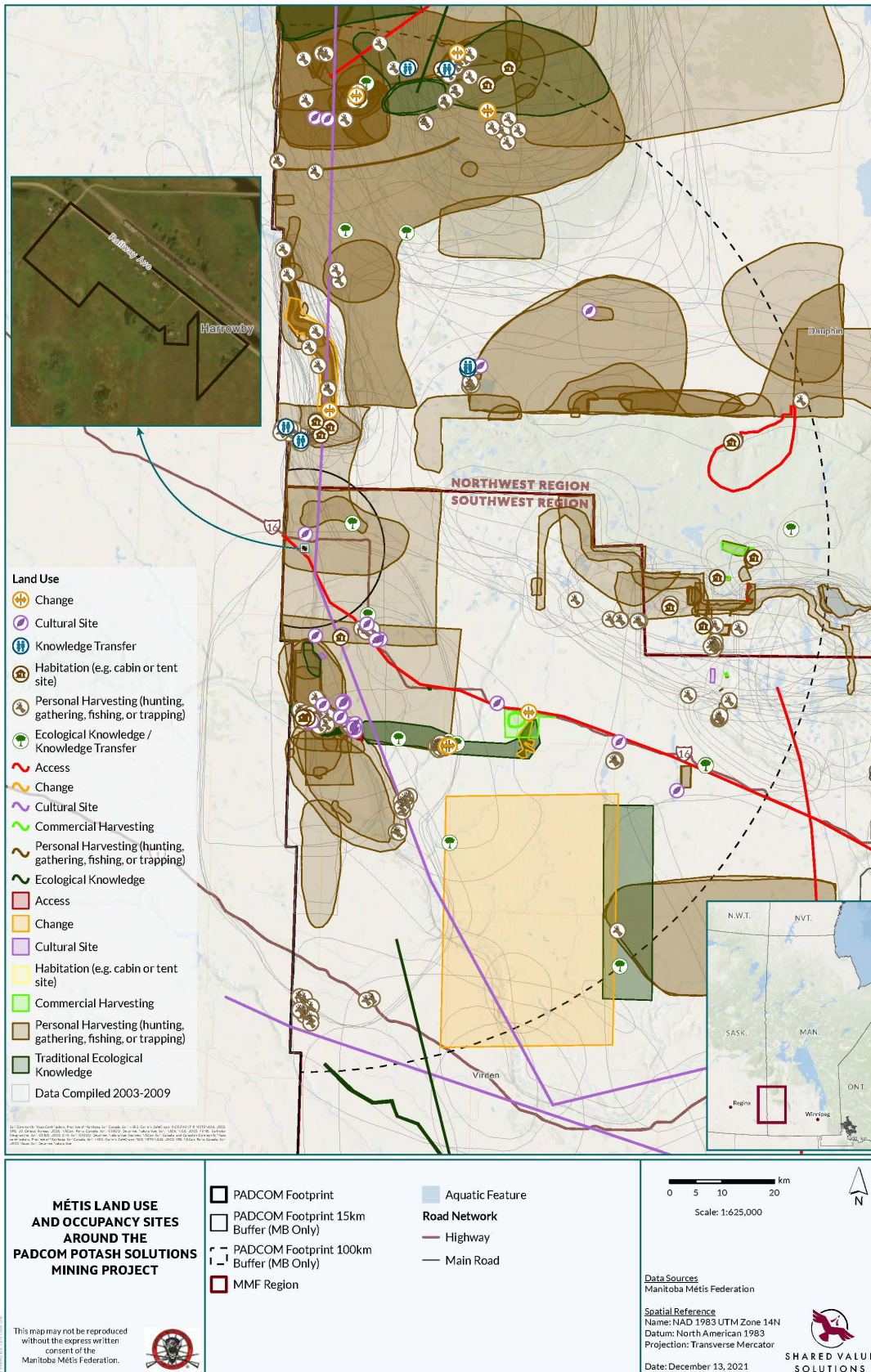


Figure 4 Métis Land Use and Occupancy near the PADCOM Potash Solutions Mining Project



The presence of values identified in previous studies indicates that there is extensive land use and occupancy of this area by Métis citizens. A fulsome and comprehensive assessment needs to be completed to more fully understand potential impacts to Métis Rights. The MMF also requires time and funding to appropriately consult with Métis citizens who harvest and live in this area.

The proposed project site is also within areas that historically have been important to the Red River Métis for trade routes and accessing the Métis Homelands. Specifically, the Assiniboine and Qu'Appelle Rivers have been, and continue to be important areas for harvesting and Métis citizens who use these rivers will need to be engaged by the MMF for this proposed project.

5.0 Recommendations

To date the MMF has not been consulted by the proponent on this file. In their Environmental Act Proposal to Manitoba Conservation and Climate, PADCOM claimed that there is a commitment in place for “5% of the net profit to be shared with Local First Nation communities and the Manitoba Metis Federation”. The MMF has not entered into such agreement and does not consider this to meet consultation requirements.

The MMF appreciates the opportunity to provide input to the IAAC decision on designation of this project. As the elected government of the Red River Métis, we put forward the following recommendations to the IAAC on this file:

- The MMF has not been provided adequate time or resources to meaningfully engage Métis citizens on this proposed project. The MMF, at a minimum, would like to host engagement meetings in the Northwest, Southwest, and Winnipeg Regions to hear directly from Métis citizens who may be impacted by the proposed project.
- The MMF would like to conduct additional Métis Knowledge, Land Use, and Occupancy interviews to support our understanding of the potential impacts of the project. The MMF would require further funding and an appropriate timeframe.
- The MMF has not been provided adequate information on the proposed project activities and how they may impact wildlife, specifically fish and fish habitat. The MMF requests that the IAAC recommends a designation of the project to ensure all regulatory bodies (such as the DFO) have opportunity to assess the potential impacts of the project. The MMF also requests funding and an appropriate amount of time to review all technical documents associate with the project and provide comment on the project activities.

In relation to the proposed project, the MMF requests the following be built into all project plans:

- Provide opportunity and prioritize Métis-owned businesses to bid on any tenders for the project.
- Provide the MMF with the Métis cultural awareness training materials used by the contractor and provide funding for the MMF to comment on the adequacy of the training plan.



- Employ, or require the employment by the licensee of, Métis environmental monitors to ensure construction and operation activities are following appropriate mitigation measures to protect the environment.

6.0 References

MMF. (2020). Consultation Report for the Duck Mountain Operating Plan 2020/2021 – 2021/2022. October 16, 2020.

