

#	Impact Study Section Referenced	MNO Comment Subject	MNO Comment	MNO Proposed Mitigation
1	N/A	Recognition of Métis Rights	<p>The IS does not appear to include proper considerations or recognition of the full scope or breadth of Métis rights and related practices.</p> <p>There also appears to be a failure to understand how conditions created by the Project will impact Métis rights and interests including cumulative effects.</p> <p>Cumulative effects are being felt in the region. Every new project contributes to these effects. More needs to be done to address this.</p>	CNC to incorporate impacts to Métis rights in a more fulsome way especially regarding cumulative impacts.
2	N/A	Traditional Knowledge	The MNO previously outlined Project impacts and concerns to Métis rights and interests within an MNO Project Impact Study provided to CNC and IAAC in June 2024. Further, the MNO did complete an initial review of a draft version of the IS and submitted comments to CNC. This input needs to be more explicitly represented in the IS. Any rationale for exclusion of information must also be specifically identified.	<p>CNC to include MNO information more explicitly in the statement, especially Section 7. CNC to provide any rationale for exclusion of information.</p> <p>CNC to provide specific responses to review comments provided by MNO, including previous review comments.</p>
3	Chapter 1.1	Project Overview	<p>There are several wording changes that should be made in order to more fully understand the scale of impact.</p> <p>There is also the misuse of the word “expected” in describing the secondary ores as they would have been studied extensively, including in resource modelling. These secondary ores have vastly different processing requirements and must be included in the IS.</p>	<p>Include the number of human generations in addition to years when referencing the life span of the Project. The number of years that are expected to be required to remediate and rehabilitate the site should also be included.</p> <p>Include the usage of Highway 655.</p> <p>Fix the wording in relation to secondary ores and their processing differences.</p>

4	Chapter 1.2.1.4	Guidelines	The TIS guidelines must be a flexible document that is able to be updated as time goes on. Additionally, the potential for neutral effects should also be considered.	<p>Include the continued re-evaluation and necessary updates to the TIS Guidelines during the IAA process.</p> <p>Include the potential for neutral effects.</p>
5	Chapter 1.2.3	Other Environmental and Regular Requirements	Consultation so far has been inadequate and more collaborative Consultation is required across agencies and ministries. This is required to ensure that all Consultation is holistic, fulsome, integrated according to MNO values, and reduces the burden of Consultation.	Provide MNO additional opportunities to receive collaborative Consultation from Federal and Provincial Ministries, including the IAA and EA.
6	Chapter 2.1.3	Corporate and Management Structure	There is inadequate consideration given regarding the health of harvesters on the land especially in relation to asbestos-forming minerals. Further, health and safety must include MNO specific impacts to health and safety. In order to support this, the creation of a joint health and safety committee that includes MNO should be initiated.	<p>IAAC must collaborate with Public Health and Provincial Labour Ministries to ensure that Health and safety must include harvesters on the land, particularly asbestos-forming minerals and their impacts to harvesters and VECs.</p> <p>Health and safety must include impacts to MNO communities and access to Public Health, including emergencies, pandemics, epidemics and outbreaks concerning access to health services.</p> <p>A health and safety committee must be developed with Provincial and Federal bodies with CNC and MNO to ensure, health and safety as it also impacts the environment and rights.</p>

7	Chapter 2.1.5	Agreements with Indigenous Nations	This entire section does not reference Métis as an Indigenous Nation nor do any Agreements. This must be addressed in the IS and throughout the IAA.	Rewrite this section to include reference to MNO.
8	Chapter 2.2	Individuals Responsible for Preparing the Impact Statement	<p>Details on the listed Qualifications of Individuals are not included, including some professional designations (e.g. "P.Eng. but no reference "civil" or "mining", etc.)</p> <p>There is no reference to the type of "Qualification" for Indigenous Relations and Public Affairs. What professional designation exists in Canada for Indigenous Relations and how does it evaluate qualifications?</p>	Provide more information regarding these individuals and what metrics will be used to asses Indigenous Relations specialists for the Project?
9	Chapter 4.2.3.1	Ontario and Canada's Critical Mineral Strategies	<p>There are no specifics in the Strategy on how Critical Minerals will affect Indigenous Nations, including Consultation and Accommodation and updates to Environmental Legislation.</p> <p>Further, the Five Core Objectives of the strategy include, "Advancing reconciliation with Indigenous peoples;" but there is no inclusion of Métis throughout the IS, including in 2.1.5.</p>	Include a section that outlines the potential impacts to Indigenous Nations from the rapid development of CM projects.
10	Chapter 4.2.5	Growth Plan for Northern Ontario	<p>There is inaccurate wording regarding the geographical nomenclature in this section.</p> <p>MNO is also not explicitly included regarding the opportunities listed here.</p>	<p>The reference to "Northern Ontario" is more appropriately referenced as "Northeastern Ontario" as no mention of Northwestern Ontario is included in the IS (e.g. 6.2)</p> <p>The MNO must be included in all of the opportunities listed within 4.2.5.</p>

11	Chapter 5	Alternatives Assessment	There is a lack of details regarding how indigenous consultation was included in this assessment.	Provide details on how Indigenous Consultation was assessed qualitatively and quantitatively in the assessment, similar to what was provided concerning economics.
12	Chapter 6.3.1.	Project Website	Indigenous groups and communities are not named on the website	CNC to update the website to include this.
13	Chapter 6.15	Meaningfulness of Consultation	<p>The IS references "Nation-specific agreements" in a manner that could be interpreted as to imply that the presence of these agreements equals meaningful consultation or even consent of the Project by the Nations in question.</p> <p>The MNO notes that consultation capacity agreements are generally established to support participation in consultation activities, including information gathering and impact identification, they are not accommodation agreements, nor do they automatically equate to meaningful consultation.</p>	<p>CNC to clarify purpose of these agreements and which Nations they are and are not with. IAAC to note that capacity funding is not accommodation for impacts to Metis rights and interests from the proposed Project.</p> <p>MNO and CNC to separately meet to discuss further relationship or impact benefit agreement to accommodate for Project effects, if approved.</p>
14	Chapter 6.5	Direct and Proportional Accommodation for Impacts	<p>The IS does not appear to have specific and proportional mitigation or accommodation measures to address Project-impacts to Métis rights and interests.</p> <p>Further, proposed biophysical mitigation measures (e.g., Fish Habitat Offsetting Plan, Traffic Management Plan) do not appear to have considered how biophysical impacts also create impacts to Métis rights and interest, nor do they appear to include Métis knowledge.</p>	Create MNO specific offsets and accommodations to ensure that the communities rights are not unnecessarily impacted.
15	Chapter 6.5	Consideration for Métis Knowledge, Rights or Interests in	The baseline studies in the IS do not include specific references to Métis knowledge or Métis rights and interests. For example, The Fish Health Assessment outlined in Chapter 6.8.	Require a Métis-led cultural landscape assessment to identify and protect sensitive areas. This could then be incorporated into the baseline data.

		Biophysical Assessments		
16	Chapter 6.5	Monitoring and Follow-Up	In previous engagement with CNC, the MNO indicated its desire to be involved in monitoring or any follow-up assessment activities. Despite this, follow-up programs such as air and water quality monitoring detailed in Chapter 12, does not identify including of the MNO.	Develop a Métis-specific monitoring framework for post-closure phases, including youth/Elder involvement. Incorporate Métis-specific performance indicators (e.g., reclaimed land accessibility, water quality in fishing areas) in follow-up monitoring.
17	Chapter 7.2.4	Description of Engagement with Indigenous Peoples	Several wording and grammatical changes are required throughout this section.	Remove “area of interest” as it is part of the Abitibi Inland Historic Métis traditional territory in MNO Region 3. Include “potential, asserted, or established Aboriginal or Treaty Rights” in the third sentence and throughout the document wherever applicable. MNO needs to be after Mattagami in the community list – there is no “the/le” or definite article. Edit the term engagement to consultation.
18	Chapter 7.1	Engagement Approach	Wording change required.	Edit “Indigenous” to “Aboriginal” when referencing law.
19	Chapter 7.1.2.1	Capacity Funding	A workplan is required to address how long-term engagement methods will be formalized through the development of Impact and Benefit Agreements (IBAs).	Provide workplan on how “long-term engagement methods will be

			There is also some wording that must be changed.	<p>formalized through the development of Impact and Benefit Agreements (IBAs) ...”</p> <p>Change “funding” to “capacity funding”</p>
20	Chapter 7.1.3	Methods of Engagement	<p>There are some wording concerns surrounding the working group. The working group is composed of some potentially affected Indigenous Nations, not all of them like this sentence implies. Further wording concerns exist regarding the usage of the word engagement throughout this section as opposed to consultation and accommodation. Engagement does not have a legal definition in this context and its usage should be avoided whenever possible.</p> <p>There is also an opportunity for the MNO to develop a working group with CNC and IAAC (to be described in 7.1.3.1) which may help to facilitate consultation.</p>	<p>Revise the wording regarding the working group especially in regard to this sentence. “The TWG is composed of potentially affected Indigenous Nations and select regulatory agencies, with a focus on those agencies with mandates that directly overlap with the main key regulatory concerns that are likely to be associated with the Project.”</p> <p>The usage of Consultation and Accommodation must be included in the description of this subsection as “engagement” is not a legal term under the DtCA.</p> <p>Create a joint CNC/IAAC/MNO working group or similar such group.</p>
21	Chapter 7.1.3.2	Engaging Diverse Populations	More detail is needed in this section to broaden the scope of diversity considered.	Indigenous Youth, Women, and Two-spirit into “including Indigenous Elders ...”

22	Chapter 7.2.1.1	Relationship Building Agreement	<p>There is an important wording change required here.</p> <ul style="list-style-type: none"> “... so that the Métis Nation of Ontario – Region 3 benefits ...” is incorrect. The RBA is for Consultation and does not include Accommodations (i.e. benefits). <p>Further changes in the opening sentence of the section are required and more information is also needed.</p> <ul style="list-style-type: none"> “Enable Métis citizens in the PA to participate in certain opportunities generated from the construction and operations of the Project”- What does this mean? <p>Another word must be changed in the second last sentence of the section</p> <ul style="list-style-type: none"> “... allowing ...” this is the wrong word. “Supporting” is a more appropriate 	<p>Change the wording in this section to more accurately reflect the goals of the agreements and provide more information regarding MNO participation in “certain opportunities”.</p> <p>Also change allowing to something more accurate like supporting in the second last sentence.</p>
23	Chapter 7.2.2.1	Traditional Knowledge and Land Use Study	<p>It is inappropriate to provide the number of participants from a TKLUS and this should be removed from the IS.</p>	<p>Remove the number of participants as it is inappropriate to share that data as it does not convey the importance of the participant in question.</p>
24	Chapter 7.2.4	Metis Nation of Ontario – Region 3	<p>MNO is not listed alphabetically in the community list.</p>	<p>Restructure the list to remove the Métis/First Nation division in the list.</p>
25	Chapter 7.2.5	Information Sharing and Events	<p>Several wording changes are required in this section.</p>	<p>Make the following changes:</p> <p>“No comments, questions, or concerns were recorded from the Métis Nation of Ontario ...” Delete or rephrase as those can only be given to the Proponent directly from the R3CC, not the community directly. Therefore, it’s not relevant and</p>

				<p>contrary to MNO Consultation Protocols.</p> <p>Re: public presentation - Delete as those can only be given to the Proponent directly from the R3CC, not the community directly, therefore it's not relevant and contrary to Consultation Protocols</p>
26	Chapter 7.3	Collaboration Following Submission of the Impact Statement	<p>Wording changes are required regarding engagement throughout this section as engagement is a lesser form of consultation that does not have a legal definition in this context and should be avoided due to this.</p> <p>Further, workplans must be provided regarding IBAs.</p>	<p>Consultation and Accommodation or the "Duty to Consult and Accommodate" must replace "engagement".</p> <p>Consultation and Accommodation Workplans to "progress IBAs and associated follow up programs" must be provided.</p>
27	Section 7 of the Summary and Chapter 29	General	<p>While the cumulative effects assessment identifies overlapping projects (e.g., mining, transportation, power infrastructure), it does not explicitly evaluate how these activities collectively impact Métis rights and way-of-life over time. For example:</p> <ul style="list-style-type: none"> • Fragmentation of wildlife or fish habitats, wildlife corridors, or vegetation critical for Métis harvesting or cultural purposes. • Overlap of Project operations with Métis harvesting seasons • Disruption or destruction of travel routes used for cultural Métis harvesting or cultural purposes. 	<p>Develop comprehensive mitigation plans for cumulative habitat loss and fragmentation, focusing on preserving critical habitats and enhancing ecosystem resilience.</p> <p>Engage in extensive consultations with the MNO to develop strategies that mitigate cumulative impacts on Indigenous rights and interests, including cultural heritage and traditional land use (trapping, fishing, hunting, harvesting etc.).</p>

			<ul style="list-style-type: none"> • Cultural heritage sites, or spiritual landscapes valued by Métis such as sacred sites may be affected by increased industrial activity near culturally significant areas 	
28	Section 7 of the Summary and Chapter 29	Narrow View of Cumulative Impacts	<p>The list of projects that are likely to trigger cumulative impacts is a fraction of the true impacts in the region. While the scope of what an IS considers is limited, there are dozens of mines contributing to the cumulative impacts on the rights of MNO Citizens nearby and by excluding them the IS doesn't fully capture these impacts. It should also be noted that forestry was not considered as part of a cumulative impact here despite the fact that it is old forestry lands.</p> <p>Further, there are many planned projects in the area with CNC's website showing 11 possible projects in the area most of which being even larger than Crawford. While it is understood that it is unlikely that all of these will be developed, CNC's plans indicate that there will be large scale development to come.</p>	<p>Assess interactions with past and present forestry, mining, and hydro developments in collaboration with the MNO to ensure proper consideration to Métis rights and interests within assessment.</p> <p>Address CNC's intent to further develop the region in the cumulative impacts section.</p>
29	Section 7 of the Summary and Chapters 14 and 15	Groundwater and Surface Water	<p>The potential for groundwater drawdown and surface water quality changes is noted, but the extent and magnitude of these effects are described as uncertain due to unknown water management plans of future projects. This uncertainty could lead to unforeseen impacts on water resources in the region.</p> <p>Moreover, the impact of the North Driftwood Diversion Channel and effluent discharges on long-term water quality should be assessed more rigorously, particularly for cumulative contamination risks involving arsenic, mercury, and nitrogen.</p>	<p>Conduct more detailed and specific studies on the cumulative impacts on groundwater and surface water, especially in relation to the Bradshaw Mine and other such projects.</p> <p>Provide long-term water quality modeling over a larger area to assess regional contamination risks.</p>
30	Section 7 of the Summary	Fish and Fish Habitat	<p>Cumulative effects on fish habitat and health are anticipated due to overlapping impacts from other mining projects. While mitigation measures are</p>	<p>Ensure robust monitoring and adaptive management programs to address uncertainties and potential</p>

	and Chapter 17		proposed, the long-term viability of fish populations, especially species at risk, remains a concern.	cumulative effects on fish populations and their habitats.
31	Section 2 of the Summary and Chapter 3.5.3	Legacy/Closure Issues	The Project's 100+ year "passive closure" phase raises concerns about intergenerational equity. For example, there is potential long-term leaching of contaminants (e.g., arsenic, nickel) from the contemplated Tailings Management Facility which could affect future Métis land use. Further, relocated highways or rail lines may permanently alter travel routes used for Métis cultural practices.	Include explicit considerations for the seven generations principal. Meaning considerations for impacts on the next seven generations when any decision is made. Consult with MNO to discuss these impacts on seven generations.
32	Section 7 of the Summary and Chapter 16	Vegetation, Riparian, and Wetland Environments	The Project is expected to disturb a significant area of vegetation and wetlands. What is not properly considered is how the Project combined with future forestry activities could result in a cumulative loss of habitat, affecting biodiversity and ecosystems. Further, there is also no consideration for past forestry activities which have already contributed to cumulative impacts.	Include at the very least past forestry activities in the cumulative impacts since they have shaped the landscape for some time and contribute to the alteration of the lands.
33	Tables in Section 7 of the Summary and Chapters 17-19	Reversibility and Positivity	Many of the impacts are framed as being reversible but this entirely ignores both the ecological realities of the Project as well as the cultural value that Métis community members may have to specific locations. Further, many of the impacts are ultimately framed as positive for the species in closure phases, but it is unclear how these conclusions were reached. For example, the IS states that birds will be positively impacted during closure. It is unclear whether this is relative to the how birds are affected during active construction and operation of the Project. If this is the case, the MNO would note that it is misleading. The disturbances that occurred during operation and	Revise the impacts tables to reflect that the habitats will not be improved without tangible proof that habitat will be of a higher quality than it is prior to construction. This is most applicable to the birds and mammal tables. Provide more information regarding reversibility of impacts including criteria for how this was determined and what perspective reversibility is considered.

			<p>construction phases may be barrier to bird populations returning to the area during closure.</p> <p>Additionally, impacts to mammals are classified as low; there are many small mammals that are not able to move like the large mammals and they are as valuable as any component can be in an ecosystem health.</p>	
34	Section 7 of the Summary and Chapters 17-19	Lack of offsets	<p>There is absolutely no mention of improving habitat for birds, mammals, insects or herpetofauna in the IS. While it is true that birds and larger mammals can go elsewhere, this is not the case for the majority of species. This further impacts the ecosystems and reduces the quality of the habitat for harvesting.</p>	<p>CNC to include considerations for herpetofauna and insects as they are essential to ecosystems.</p> <p>CNC to provide tangible examples of how birds and mammals will have improved habitat post closure is essential.</p>
35	Section 7 of the Summary and Chapter 20	Climate Change	<p>Climate change is not considered in general or in the revegetation plan specifically. It is extremely unlikely that the forests that will be cut down will grow back in a similar manner as they will not be in the same climate as they have been.</p> <p>While it is understood that the Project itself will be a carbon sink, that does not mean that it exists in a vacuum. Further, if the proposed sequestration is not as effective as designed the project would no longer be a carbon sink and this outcome should be planned for.</p>	<p>CNC to include as much provenance testing and test plots as possible during progressive rehabilitation.</p> <p>Details of these tests to be included in revegetation plans.</p> <p>CNC to develop additional carbon offsets if it is shown that the sequestration potential of the Project is less than expected.</p>
36	Section 6.13 of the Summary and chapter 22	Housing and Cost of Living	<p>The Project anticipates an influx of non-local workers (peak of 1,600 non-local workers), which could exacerbate housing shortages and inflate rental costs in nearby communities. While the IS mentions studying accommodation options (Section 6.13), there is no Métis-specific analysis of how these pressures might disproportionately affect low-income Métis families or urban Métis populations. Nor does it indicate how Métis</p>	<p>Conduct a Regional Housing Impact Study to determine how the Project could affect housing availability.</p> <p>In partnership with the MNO, provide funding for affordable housing initiatives to offset increased demand.</p> <p>A similar program for childcare would also be beneficial</p>

			<p>families, particularly low-income households, will compete with high-earning workers for rentals.</p> <p>It should also be noted that Timmins is currently experiencing a housing crisis with very limited housing availability, high housing costs and low childcare spaces. All of which is likely to be exacerbated by this project especially for Métis citizens.</p>	
37	Section 6.13 of the Summary and Chapter 22	Social Services and Infrastructures	<p>The Project is expected to increase the demand for services and infrastructures, potentially leading to increased strain or additional barriers to access of those services or infrastructures. This could increase the risks to health and well-being of MNO Citizens.</p> <p>Of particular concern are the impacts to education services which are already being pushed to their limits across the region. Staff shortages and limited spaces, especially for higher needs students, are prevalent and this is likely to become more severe as the region develops.</p> <p>For context, the Timmins region, including the Porcupine and Timiskaming Health Unit areas, have the lowest social determinants of health in Ontario and limited access to Primary and Specialized Care which further compounds these concerns.</p>	<p>Develop and implement comprehensive health and social services plans to address the increased demand and minimize any associated risks to health and well-being.</p> <p>Meet with the relevant school boards and Indigenous education organizations to determine the scope of these impacts and find a solution to mitigate these impacts as best as possible.</p>
38	Section 6.13 of the Summary and Chapter 22	Safety and Security	<p>The presence of a large workforce may lead to increased safety risks to MNO Citizens, particularly Métis women, girls, or two spirit. The assessment acknowledges the potential for increased human trafficking and violence against women and girls but does not include details on specific considerations or measures to protect Métis women, girls or two spirit Citizens and 2SLGBTQIA+ people in general.</p>	<p>Establish community safety initiatives and MNO-specific safety initiatives, including partnerships with local law enforcement and social service providers, to mitigate risks associated with potential increased crime rates and protect vulnerable populations. Risks to women, 2SLGBTQIA+</p>

			<p>Some of the most critical concerns are a lack of Indigenous emergency housing which are essential during times of crisis; an active drug trafficking network –which will have more clients and more money as the region develops—that is using Timmins as a distribution hub with the second highest fatal overdose rate in the province; and a generally high crime rate. All of these are likely to increase with population and a transient, highly paid population further exasperates this.</p> <p>Moreover, there are increased risk of MNO Citizens facing racism or discrimination through interactions with transient workforce members. For example, a Métis harvester hunting near the Project site may risk being harassed due to overt or inherent racism or general a lack of understanding of Métis rights.</p>	<p>individuals and other such groups should be included within this.</p> <p>Work with the MNO to develop and deliver anti-racism training to all employees and contractors.</p>
39	Section 6.12 of the Summary and Chapter 21.4 among others	Food Security	<p>Changes in land use and potential contamination of traditional food sources could affect food security and dietary habits of MNO Citizens that rely on foods that they harvest or that is harvested on their behalf. A decline in food security from harvested foods, will lead to economic strain on our Citizens who may be required to rely more on foods from the grocery store.</p>	<p>Work with the MNO to establish and support Métis-led programs like land-based healing camps or traditional food security initiatives.</p>
40	Section 6.12 of the Summary and Chapter 21.4	Food Safety	<p>Increases of contaminants (e.g., mercury and arsenic) from the Project could bioaccumulate within harvested resources such as fish, wildlife, or vegetation making them unsafe for consumption. Generally, the MNO has found that proponent-led studies conducted to understand risks to human health from contamination of resources does not properly account for the frequency of consumption by MNO Citizens. Further,</p>	<p>Collaborate with the MNO to conduct long-term food monitoring program to track contamination levels in fish, wildlife, and vegetation.</p> <p>Consult with the MNO to identify and implement measures to safeguard traditional food sources and ensure food security.</p>

			<p>these studies don't account for perceptions leading to effects.</p> <p>For example, if an MNO Citizen perceives that a deer is contaminated because of development, they will still not harvest the deer regardless of whether it is found actually safe to consume.</p> <p>Another important consideration is that the regional community practices community, family and individual harvesting and the impacts are different for each one. This is seemingly all lumped together in the IS and this is not typically preferred by the community or by past consultation with the government. For example, if the community perceives that the aforementioned deer is not safe but the person who hunted the deer believes that it is safe, community harvesting has been heavily impacted but individual harvesting may be less so</p>	<p>Work with MNO to determine effective ways to convey the safety of the site post closure.</p> <p>Provide at the very least some mention of the different impacts to these harvesting types and develop protocols to ensure that all types of harvesting can continue unabated.</p>
41	Section 6.13 of the Summary and Chapter 23.4	Economic Benefits	<p>The MNO recognizes that industrial development can positively affect the economy by creating employment opportunities and work contracts for those living in the area, as well as increased commerce in towns located near projects. However, the distribution of these benefits is typically unequal. Métis are often more negatively impacted by industrial development (i.e., direct and indirect impacts to their rights and way of life) and receive fewer benefits regarding economic impacts.</p>	<p>Prioritize hiring or contracting of Métis employees, businesses or contractors and identify additional initiatives to address economic benefit inequities.</p> <p>Moreover, providing training and retraining for MNO citizens, especially youth would be an excellent way to ensure that MNO citizens benefit more equally from such projects.</p>
42	Section 6.13 of the Summary and Chapter 21	Emergency Response	<p>Emergency response plans need to explicitly consider the potential of Métis harvesters and cultural practitioners within the area of the Project. There will need to be specific steps taken to ensure that they are properly protected in the event of an incident.</p>	<p>Consult with the MNO to develop Métis-specific emergency response protocols that address issues that may occur while MNO Citizens are nearby the Project.</p>

43	Chapter 30 and all Chapters	Working Group Creation	<p>IAAC, Public Health, NRCan, ECCC, MECP, and MINES including the Federal and Provincial Critical Mineral Strategy have not updated their methodology to include many ores and minerals included in this study, including palladium.</p> <p>How will these minerals and ores be evaluated (e.g. impacts to rights, environment and public health) without the proper methodology in place?</p>	<p>Form a Working Group between these Ministries with the MNO to begin developing the methodology. All Chapters rely on this data, particularly as it pertains to impacts to the environment and impacts to s. 35 rights.</p>
44	Chapter 34	Workplan Creation	<p>There is a lack of concrete workplans and timelines in regards to MNO involvement in monitoring.</p>	<p>Provide concrete Workplans and timelines to ensure that the MNO is involved in all monitoring.</p>