



Métis Nation of Ontario
Lands, Resources and Consultations

March 23, 2023

Impact Assessment Agency of Canada
Northern Road Link Project Team
55 York Street, 6th Floor
Toronto, ON
M6J 1R7

VIA ELECTRONIC MAIL

RE: “Northern Road Link Project - Invitation to Participate in the Review of the Summary of the Initial Project Description; Request for Comments by March 23, 2023”

On February 21, 2023 the Métis Nation of Ontario (MNO) received notice from the Impact assessment Agency of Canada (IAAC) that it had accepted the Initial Project Description for the Northern Road Link Project (the Project), and requests comments from potentially affected communities by March 23, 2023. Marten Falls First Nation (MFFN) and Webequie First Nation (WFN; jointly ‘the Proponents’) are proposing the construction and operation, including maintenance, of an all-season multi-use public highway located in northern Ontario. IAAC further describes the Project as follows:

“As proposed, the Project would be about 117 to 164 kilometres long and cross the Attawapiskat River. It would connect the proposed Marten Falls Community Access Road and the proposed Webequie Supply Road. The highway would become part of a future all-season road network connecting mineral development activities in the Ring of Fire area to the provincial highway system at Nakina, Ontario.”

The southern extent of the Project area lies approximately 175 km north of the currently known area of the Métis Nation of Ontario’s Lakehead/Nipigon/Michipicoten Traditional Territories, represented by the Northern Lake Superior Historic Métis Community (Region 2) Consultation Committee, as per the Consultation Agreement between the Métis Nation of Ontario and the Government of Canada. Citizens of the Métis Nation of Ontario have Aboriginal rights that are recognized and affirmed under section 35 of the *Constitution Act, 1982*. In addition, the Métis Nation of Ontario citizens have harvesting rights under the Framework Agreement on Métis Harvesting with the Province of Ontario. The Métis Nation of Ontario Region 2 was not identified by Ontario as an Indigenous organization whose Aboriginal treaty rights may be affected by the

Project, however Ontario formally recognized that the Métis Nation of Ontario Region 2 may have an interest in the potential environmental effects of the Project (MECP, 2021)¹.

Within the Summary of Initial Project Description, the Proponent's states that a primary objective of the project is to "...stimulate sustainable regional economic activity by facilitating all-season road movement of materials, supplies, and people to and from the Ring of Fire area."² Due to the inherent regional implications of the Project including the increased access to the Ring of Fire area from the provincial highway system, the Métis Nation of Ontario anticipates that this Project may have potential cumulative, regional, and far-reaching impacts to the physical and human environments. Below, we have provided a summary of potential impacts that are of concern to the Métis Nation of Ontario's Region 2 citizens.

Potential impacts to the current use of lands and resources for traditional purposes

1. Potential impacts to Métis harvesting as a result of the increased access. Year-round accessibility to a previously difficult to access and remote area will likely increase non-Indigenous hunting and fishing activities, which could have added pressure on wildlife populations.
2. Potential impacts to Métis harvesting and land use due to vehicle traffic including mineral development/mining related vehicles, personal vehicles, and all-terrain vehicles. Traffic can produce dust and have negative impacts to vegetation. Additionally, traffic creates noise and can negatively impact wildlife populations through sensory disturbance.
3. Potential impacts to Species at Risk and Significant Wildlife Habitat and COSEWIC listed species resulting from increased access, habitat disruption, sensory disturbance, increased harvesting pressure, etc.
4. Potential impacts to native vegetation from invasive species. What monitoring and mitigation measures for invasive species are proposed? There is a need to expand beyond the project site as the area adjacent to site can be directly affected.
5. Historical vs. Current habitat, flora, fauna presence (e.g. species detected in project area before, but not now) Absence does not exactly mean not there. How will this information be considered?
6. As part of the Strategic Assessment on Climate Change for the Project, the Proponents provide an estimate of operations phase GHG emissions, with estimates based on assumed traffic loading. Given the absence of a completed Regional Assessment for the Project, there is likely significant uncertainty of GHG emissions estimates for the operations phase. Methodology, data collection and analysis must be provided. Additionally, what mitigations are proposed to reduce GHG emissions (e.g. maximum traffic levels) and who would enforce those limitations on road users such as from mineral development projects?

¹ October 22, 2021. Ministry of the Environment, Conservation and Parks (MECP). Letter to the Métis Nation of Ontario.

² February 21, 2023. Northern Road Link. Summary of an Initial Project Description of a Designated Project. Section 8.1 Purpose of the Project.

7. How will the Project design and engineering account for future mine-related traffic if this metric is unknown at this time? For example, will the road design account for heavy mine vehicles and loads, will it include frequent pull-outs, visibility markers, etc. Will the preferred route consider visibility sight lines. Will the Proponent's use dust suppressant as a mitigation for dust? Will there be spill kits located along the route?
8. How will cumulative effects be assessed for the Project? How are the regional effects of the access through the MNO Region 2 to the remote Ring of Fire mining area taken into consideration as it impacts Aboriginal rights?
9. The frequency and duration of activities in the assessment of potential impacts to the exercise of Aboriginal rights and interests must also be considered. For example, loss of the right to harvest due to project construction and the impacts to the potentially affected communities.
10. Ensure methodology includes residual effects and significance determinations. It is important to ensure that the determination of residual effects and the resulting significance of potential adverse impacts follows EA best practice and the methodology is thoroughly outlined in order for potentially impacted communities to understand how conclusions were reached.

Potential impacts to health, social, or economic conditions

1. How will the Proponents address road safety and rules of the road for all users of the road including recreational users, members of the public, and mineral development activity traffic.
2. How will community and personal safety be assessed (in surrounding communities) as it relates to Métis women, girls, and 2SLGBTQ+ citizens throughout the Project?
3. How will the potential impacts of income inequality be assessed as it relates to the Project?
4. How will the potential impacts on infrastructure and services used in urban environments be assessed?
5. How will social determinants of health be assessed, including impacts to the strained healthcare system?

Other Recommendations

1. Section 14.5.1 notes that "*It is the proponent's understanding that the Project is within the traditional lands of Métis Nation of Ontario – Region 2 and in proximity to the traditional lands of Métis Nation of Ontario – Region 3.*" However, Figure 14-3 does not include the location of the Métis Nation of Ontario Region 2 traditional territories with respect to the Project. Please revise this section and figure to accurately depict the location of MNO Region 2 traditional territories.

2. Update Section 4.5.4 to reflect current developments regarding the Métis Nation of Ontario's negotiations with the Crown related to self-government.³
3. List all Indigenous groups alphabetically (or another format that shows there is no hierarchy).
4. Explicitly state in all documents, meetings, and forums that all Indigenous groups are equal but unique under s. 35, *Constitution Act, 1982*
5. Inclusion of an Indigenous liaison throughout the entire IAAC process and present in all meetings.
6. What methods will be used to ensure the privacy and confidentiality of all shared documents?
7. How will IAAC ensure collaboration between all Federal and Provincial Ministries?
8. How will the MNO be sufficiently educated on the evaluation metrics IAAC uses throughout the processes, e.g. what are the metrics (significance determinations) to evaluate impacts to Valued Components using both Western Science and Traditional Knowledge?
9. How will IAAC adequately assess the cumulative and regional impacts of the Project, without completion of a Regional Assessment?

Consideration of the Métis Nation of Ontario's comments will ensure consultation will proceed in a respectful and meaningful way as it relates to the Northern Road Link Project. If you have any questions please contact Victoria Stinson, Manager, Lands, Resources, and Consultations Branch at <Email address removed> or Erin Reimer, Mineral Development Advisor- Northwest at <Email address removed>.

Marsi, Miigwetch, Thank you, Merci,

<Original signed by>

Tim Sinclair, Regional Councillor and Chair, Métis Nation of Ontario, Region 2

cc: Victoria Stinson – Manager – Lands, Resources, and Consultations Branch (LRC), MNO
 Erin Reimer – Mineral Development Advisor, LRC, MNO
 Caitlin Cafaro – Senior Consultation Analyst, IAAC

³ <https://www.metisnation.org/news/canada-and-metis-nation-of-ontario-sign-updated-metis-self-government-agreement/>