

**Comment Form – Draft Permitting Plan and Draft Tailored Impact Statement Guidelines – Federal Review Team**

**Northern Road Link Project**

**Response required by: July 21, 2023**

All comments should be submitted via the Submit a Comment feature available on the Project’s Canadian Impact Assessment Registry page (<https://iaac-aeic.gc.ca/050/evaluations/proj/84331>). Documents can be uploaded using this feature. If you have any difficulties submitting this way, please contact the Registry directly at [registry-registre@iaac-aeic.gc.ca](mailto:registry-registre@iaac-aeic.gc.ca). All comments submitted using this form will be posted on the Registry website for the Project.

Please note that this is your opportunity to customize the Tailored Impact Statement Guidelines. The Agency is required to issue the final Guidelines and plans no later than day 180 of the planning phase (August 20, 2023).

Department/Agency:	Indigenous Services Canada		
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**Section 1 – Draft Permitting Plan:**

1. Confirm that all applicable legislative and regulatory oversight that may apply to the Project, under the authority of your department or agency, is accurately listed in the draft Permitting Plan.

**Insert response here:**

The Northern Road Link Project is expected to be entirely on provincial Crown Land, therefore, Indigenous Services Canada does not have authority for permitting.

Should the proponent require gravel from Indian Reserve lands during construction and operation, permitting under the Indian Act will be required, and the proponent should consult with the Lands program at ISC Ontario Region.

2. Indicate whether your department or agency has identified any power that it will be unable to exercise to allow the Project to proceed, in whole or in part. For more information, please refer to subsection 17(1) of the IAA.

**Insert response here:**

Indigenous Services Canada does not have any power over the project that will occur on Provincial Crown lands.



**Section 2 – Draft Tailored Impact Statement Guidelines:**

1. Please review the draft Tailored Impact Statement Guidelines (the Guidelines) sections that are applicable to your department’s or agency’s mandate.
2. Using the table below, given the context of the Project, please provide any comments and include your recommendation for how the final Tailored Impact Statement Guidelines should be adapted to address any comments.
  - Please indicate any corrections, additions or deletions that should be made to the text. Please provide a clear context and rationale for your recommendations.
  - With a view to maximizing efficiency of assessment processes, the Guidelines should focus on key issues, effects and factors anticipated to be material and relevant to a public interest decision, and requirements should be clear and specific.

Department – Comment ID (e.g., ECCC-01)	Draft Guidelines Section	Context and Rationale (provide an explanation of your comments)	Recommendation: provide text to be inserted or deleted. Be specific on the location within the draft Guidelines that the text would be added/deleted.
ISC - 01	3.2 Project location Page 11	Re description of local communities and Indigenous communities: the TSIG should include a bullet identifying a list of potentially impacted communities as per watershed boundary and regional scope.	<ul style="list-style-type: none"> <li>• Description of local and Indigenous communities including but not limited to:               <ul style="list-style-type: none"> <li>○ Marten Falls First Nation,</li> <li>○ Webequie First Nation,</li> <li>○ Neskantaga First Nation,</li> <li>○ Eabametoong First Nation,</li> <li>○ Aroland First Nation,</li> <li>○ Long Lake #58 First Nation,</li> <li>○ Ginoogaming First Nation,</li> <li>○ Nibinamik First Nation,</li> <li>○ Constance Lake First Nation,</li> <li>○ Attawapiskat First Nation,</li> <li>○ Fort Albany,</li> <li>○ Kashechewan,</li> <li>○ Mishkeegogaming</li> <li>○ Ojibway Nation of Saugeen</li> <li>○ Wunnumin Lake,</li> <li>○ Kingfisher Lake,</li> <li>○ Kasabonika Lake,</li> <li>○ Wawakapewin,</li> <li>○ Kasabonika Lake,</li> <li>○ Wapekeka</li> </ul> </li> </ul>

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			<ul style="list-style-type: none"> <li>○ Kitchenuhmaykoosib Inninuwug,</li> <li>○ Weenusk</li> <li>○ Bearskin Lake</li> <li>○ North Caribou Lake</li> <li>○ Metis Nation of Ontario</li> </ul>
ISC - 02	3.4 Project components Bullets page 12-13	The road will be on Crown land and through wetlands. If the proponent requires gravel resources from Indian Reserve lands, permitting should be referenced, and include temporary or permanent roads to access any gravel sources on reserves, as required under the Indian Act	<ul style="list-style-type: none"> <li>• borrow pits, gravel or aggregate pits... if seeking aggregate from a source located on and Indian reserve, the proponent will work with the First Nation and Indigenous Services Canada to obtain a permit to take gravel and develop an access road, under the Indian Act.</li> </ul>
ISC - 03	3.6 Workforce requirements Page 17-18	Depending on the nature and skills required by Indigenous persons, policies and programs may require an Indigenous training and employment plan, or develop joint ventures throughout the project lifetime.	<ul style="list-style-type: none"> <li>• Workplace policies and programs for Indigenous employment should include a Training and Employment Plan, and/or First Nation Business Contracting Plan, that will address pre-training requirements, training, and long term employment and contracting goals such as joint ventures.</li> </ul>
ISC - 04	5.Description of public participation	(comments also apply to Indigenous Engagement and Partnership Plan) In-person meetings are often preferred and more accessible to First Nations communities, and can provide a more meaningful forum for two-way dialogue. Town halls that favour time for community input should be emphasized in the engagement requirements so as to more fully understand community concerns. In-person meetings should be held in each impacted community, and the Impact Statement should present concerns disaggregated by community.	<ul style="list-style-type: none"> <li>• Under “Engagement method” for all phases, include “Town hall”, and/ or specify “In-person meetings”</li> </ul>
ISC - 05	Baseline conditions	Consider any existing or potential/planned communal water system infrastructure for Indigenous communities, and	Add to first sentence local and regional infrastructure:

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	9.1.2 Services and Infrastructure page 112	relevant community plans that may be affected or be supported by the project.	<p>First Nation communal water infrastructure systems and source of water.</p> <p>Add to local and regional services:</p> <ul style="list-style-type: none"> <li>• Emergency Plans</li> <li>• Community Development Plans</li> <li>• Community Safety or Wellbeing plans</li> </ul>
ISC - 06	9.2.1 Effects to services and infrastructure	Potential interactions can include Interactions with emergency plans and community Development Plans	<ul style="list-style-type: none"> <li>• Community emergency plans</li> <li>• Community Development Plans</li> <li>• Community Safety or Wellbeing plans</li> </ul>
ISC - 07	10.1.1 Baseline conditions Page 118	Second last bullet, include historical verbal interpretation of Treaty 9.	<ul style="list-style-type: none"> <li>• Include components of the environment.... As a multidimensional concept which is not limited to sites or objects (ie verbal history of Treaty 9)</li> </ul>
ISC - 08	10.3 Health, social and economic conditions Page 122	Education should be included as an element of social conditions.	<ul style="list-style-type: none"> <li>• The Impact Statement must describe the health, social (including education) and economic effects the Project may have on Indigenous peoples.</li> </ul>
ISC - 09	(Health) Baseline conditions Page 125	<p>For the bulleted examples on this page, there are some that could be expanded to cover pertinent sub-categories.</p> <p>Perceived impacts are an important element of access to country foods.</p> <p>Availability and access are both important facets of food security.</p> <p>Please expand with some elements of social cohesion (include lateral violence, family violence, child welfare, depending on sample size)</p>	<ul style="list-style-type: none"> <li>• Add sub bullets: <ul style="list-style-type: none"> <li>○ Food security, accessibility <i>and availability of country/traditional foods (including perceived impacts)</i> <ul style="list-style-type: none"> <li>-distance to animals and fish,</li> <li>-contamination, safety and quality</li> <li>-access to boats/gas for fishing and hunting</li> </ul> </li> <li>○ Social cohesion (<i>child welfare rates, lateral violence, family violence, and only if population can respect individual privacy</i>)</li> </ul> </li> </ul>
ISC - 10	10.3.2.2.1 changes to community well-being	Page 133 : Please add a bullet to 'potential adverse and positive effects to social conditions' to include child welfare. Complex factors related	<p>Add to page 133 changes to social conditions</p> <ul style="list-style-type: none"> <li>○ <i>Child welfare (removed from community and family, kinship care)</i></li> </ul>

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	Page 132, 133 and 133	to project effects may have impacts on family cohesion that effect children.  Add also: Social assistance rates, as the road projects will impact remoteness codes and associated financial supports.	<ul style="list-style-type: none"> <li>○ <i>Income inequity and social assistance rates</i></li> </ul>
ISC - 11	10.3.2.2.2 Changes to services and infrastructure Page 134	Considering the potential for change in community access to and dynamics with alcohol and substances, please expand on the bullet for “health care facilities”.  ○	The Impact Statement must: <ul style="list-style-type: none"> <li>● describe the predicted effects.... <ul style="list-style-type: none"> <li>○ Health care facilities and mental health services ( <i>addiction treatment centres, back to land programs</i>)</li> </ul> </li> </ul>
ISC - 12	10.3.3.1 Economic Baseline conditions	There may be community economic development plans available in some of the potentially impacted communities. These would be important to consider in the baseline discussion.	Add bullet: <ul style="list-style-type: none"> <li>● community economic development plans and goals (if accessible)</li> </ul>
ISC - 13	10.4.2 Impacts on Indigenous rights Page 139 - 140	The Impact Statement should consider and describe...second bullet The interference of the Project on the quality and quantity of resources available for the exercise of rights (ie. opening the north to non-Indigenous hunters and fishers, new camp outposts,) Add to any measures identified in an attempt to avoid, minimize offset... (scope new opportunities to support fish and wildlife ecosystem)	Page 139 add to second bullet: <ul style="list-style-type: none"> <li>○ The interference of the Project on the quality and quantity of resources available for the exercise of rights (ie. opening the north to non-Indigenous hunters and fishers, new Indigenous outposts)</li> </ul> Page 140 , 4 <sup>th</sup> bullet <ul style="list-style-type: none"> <li>○ any measures identified in an attempt to avoid , minimize offset... (ie. scope new opportunities to support fish and wildlife ecosystems )</li> </ul>
ISC - 14	10.5 Mitigation and enhancement Page 143	Mitigation and enhancement measures (bottom of page), should also reference recipients receiving Ontario Works, under the 1965 Agreement are eligible to receive wage subsidy.	Page 143 <ul style="list-style-type: none"> <li>○ Opportunities for enhancing positive effects, such as creation of local employment...including <ul style="list-style-type: none"> <li>○ Employment, training... (e.g. wage subsidy programs for recipients receiving Ontario Works under the 1965 Welfare Agreement)</li> </ul> </li> </ul>

Insert as many rows as applicable