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July 21, 2023

RE: Northern Road Link Impact Assessment Tailored Impact Statement Guidelines and Indigenous Engagement and Partnership Plan

On July 21, 2023, the Impact Assessment Agency of Canada (“IAAC”) sent a letter to Aroland First Nation (“AFN”) requesting comments on the draft Indigenous Engagement and Partnership Plan (“IEPP”) and the draft Tailored Impact Statement Guidelines (“TISG”) for the Northern Road Link Project’s (“the Project”) federal Impact Assessment. In this submission, we provide our comments on the draft IEPP (see Appendix 1), followed by our review of the draft TISG (see Appendix 2), along with the following general comments on the Project and Impact Assessment process which should also be addressed in IAAC’s response and amendments to these important procedural documents.

We are concerned by Ontario’s colonial approach to decision-making in the Environmental Assessment process to date, agreeing only to recognize decision-making by the small number of First Nations who will gain all-season road access from the roads projects and who have expressed their support for the related mineral development the road developments would facilitate. To be clear, AFN is not expressing opposition to all-season roads: we recognize the need and right for First Nations to be connected to the provincial highway network. However, we are deeply concerned with the ongoing absence of approaches to shared decision-making that involve AFN and all of the First Nations whose Aboriginal and Treaty Rights and interests are impacted by the proposed Project. It is absolutely essential that this is not the case in the Federal Impact Assessment process. IAAC must consider AFN to be a shared decision-maker in all stages of the Impact Assessment process and should consider the formation of a Joint Assessment Committee that includes AFN, or include equivalent shared decision-making measures in a community-specific engagement and consultation plan developed between AFN and IAAC.

Further, due to the massive scale the potential impacts of the development of the Project may have on AFN, our Traditional Territory and the entire region, the Impact Assessment should not be approved until the completion of a Regional Assessment that covers all potential development in the entire James Bay Lowlands area. The Regional Assessment must be co-developed, co-implemented and co-enforced by a body of all the affected First Nations in the region. This will ensure that our consent to all or part of the Project, and to decisions made by IAAC related to the Impact Assessment, are made in a fully informed manner. The Project’s TISG and IEPP must reflect such a relationship between the Impact Assessment for this Project and the Regional Assessment in the Ring of Fire Area.

Finally, given that there are three road projects (Webequie Supply Road, Northern Road Link and Marten Falls Community Access Road) that in some way support exploration, development, and access to the Ring of Fire, we propose that the Webequie Supply Road, the Northern Road Link, and that portion of the Marten Falls Community Access Road that connects the Webequie Supply Road and Northern Road Link be viewed as a single project that is considered in a single federal Impact Assessment. Separate, fragmented Environmental Assessment and Impact

Assessment processes have proven ineffective in engaging First Nations and fully accounting for the cumulative environmental, socio-economic and cultural impacts the development of this area represents. At a minimum, the proponent group for both the Webequie Supply Road and Marten Falls Community Access Road projects, as well as the Northern Road Link Project, must develop and implement a coordinated approach across the three Environmental Assessment/Impact Assessment processes, subject to recommendations from the Regional Assessment, which should be reflected in the TISG and IEPP.

We require a written response to this submission that addresses each of our comments in the letter above and in the Appendices that follow.

Respectfully,

<original signed by>

Chief Dorothy Towedo
Aroland First Nation

Cc:
Aroland First Nation Council
Chief Bruce Achneepineskum and Council, Marten Falls First Nation
Chief Cornelius Wabasse and Council, Webequie First Nation
Laura Sayers, Shared Value Solutions
Andrew Peach, Shared Value Solutions

Appendix 1: Review – Draft Indigenous Engagement and Partnership Plan

Section	Comment	Recommendation
<p><i>Section 3: Objectives of Indigenous Engagement and Partnership</i></p>	<p>In 2016, the Government of Canada adopted the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). UNDRIP introduced the concept of the right to Free, Prior, and informed consent as a new consideration for the Crown and resource development proponents. More specifically, Article 32.1 of UNDRIP sets the direction that ought to be taken by the Crown and resource companies when consulting with Indigenous Peoples. Article 32.1 of UNDRIP states that Indigenous Peoples shall be consulted in good faith through their own representative institutions in order to obtain their free and informed consent prior to the approval of any project affecting the community’s lands or resources.</p> <p>We note that while the draft TISG cites the principles of free, prior and informed consent and describes how this principle reflects “working together in good faith on decisions that impact Indigenous Peoples, with the intention to achieve consensus” the draft TISG do not include any clear commitment that the consent of AFN and other impacted Indigenous communities is a requirement of the Impact Assessment process and will be obtained prior to any approval issued by IAAC for the Project.</p>	<p>In order to ensure consultation and engagement is consistent with the Government of Canada’s commitment to implement the United Nations Declaration on the Rights of Indigenous Peoples, IAAC’s Objectives in Section 3 of the draft IEPP must be amended to include a specific commitment to obtaining the consent of impacted Indigenous communities prior to the approval of a Project that will affect their rights, lands and resources.</p>
<p><i>Section 3: Objectives of Indigenous Engagement and Partnership</i></p>	<p>Section 3 states that as an objective identified by Indigenous communities during the planning phase, “Indigenous knowledge needs to be considered on equitable footing with western scientific information in decision-making processes related to the Project.”</p>	<p>Section 3 should be amended to state that the traditional knowledge and land use information of impacted Indigenous communities must be considered throughout all phases of the assessment, including but not limited to: the development of spatial and temporal boundaries utilized in the effects assessment; the characterization of baseline conditions; the</p>

	<p>While it is important that Indigenous knowledge is considered along with western scientific information in decision-making related to the Project, this information is invaluable to every aspect of the of the Impact Assessment process prior to decision-making, which should be clearly stated.</p>	<p>assessment of adverse effects; the identification of appropriate mitigation and monitoring measures; and characterizing residual effects. This should not only be included as an objective of Indigenous communities, but also reflected as an objective of IAAC, given the Government of Canada’s commitment to reconciliation and to implement the United Nations Declaration on the Rights of Indigenous Peoples.</p>
<p><i>Section 5: Engagement and Consultation Tools and Methods</i> <i>Section 6: Engagement and Consultation Approach, Phase 1 (Planning)</i></p>	<p>Section 5 sets out a list of tools and methods identified by the Agency and Indigenous communities to be utilized for consultation and engagement. AFN notes that while these are suitable general measures, more specific tools, methods and objectives need to be developed specifically with AFN to ensure that meaningful consultation occurs with our First Nation throughout the Impact Assessment process that reflects our consultation protocols and the unique interactions of the Project with our rights and interests. AFN notes IAAC commits in Section 6 that “the Agency will work with Indigenous communities to develop community-specific consultation work plans, as needed.”</p>	<p>AFN requires that a community-specific consultation plan/process agreement is developed between IAAC and AFN prior to the Impact Assessment advancing to the Impact Statement phase. Such a plan/agreement must include:</p> <ul style="list-style-type: none"> • Free, prior and informed consent as the overall objective for the Crown’s consultation and engagement, and requirements for relevant accommodation measures to be in place before the Project is approved. • A clear process for how AFN input and recommendations will be integrated into Agency documents, and a resolution process for how AFN input and recommendations not accepted by the Agency will be discussed in assessment documents, prior to their publication. • A mutually agreed upon methodology for the assessment of the Project’s impacts on our rights, and the process for our collaboration in each step of the assessment, including our involvement in writing the Agency’s Rights Impact Assessment on matters related to AFN. • A protocol setting out who correspondence is directed to at AFN • The Agency’s commitment to directing the proponent to specifically support our Nation’s

		<p>participation in the completion of the Impact Statement, which could include funding studies, as per Section 6 of the Tailored Impact Statement Guidelines</p> <ul style="list-style-type: none"> • The Agency’s commitment to capacity funding to support our Nation’s participation in various aspects of the Impact Assessment process • Integration of other aspects of AFN’s Consultation Protocol
<p><i>Section 6: Engagement and Consultation Approach</i></p>	<p>AFN notes that the <i>Impact Assessment Act</i> and corresponding Impact Assessment process is new and will take place over several years, which underpins a need for relevant capacity building that is currently not considered in Section 6..</p>	<p>The Agency activities in Table 1 of Section 6 should be amended to include capacity building activities, discussion and workshops at the outset of each phase of the Impact Assessment process. At the conclusion of each phase, IAAC should provide opportunity for Indigenous communities to provide comments and identify lessons learned to advance into subsequent phases of the Impact Assessment. This will allow AFN to provide more specific feedback regarding activities and engagement approaches for each phase of the process as capacity and learning around the new <i>Impact Assessment Act</i> increases.</p>
<p><i>Section 6: Engagement and Consultation Approach, Phase 2 (Impact Statement)</i></p>	<p>AFN notes that the current description of Indigenous communities’ participation in the development of the Impact Statement is limited to sharing information and providing comments to IAAC and the Proponent, and does not reflect a process of co-developing the Impact Statement in a way that is marked by true partnership.</p>	<p>Table 1 of Section 6 should be amended to include the following:</p> <ul style="list-style-type: none"> • IAAC and the Proponent should engage AFN to co-develop and participate in all baseline studies within AFN’s territory. This could be fulfilled through the hiring of environmental and cultural heritage monitors to participate alongside study area specialists when conducting baseline research. Participation and co-development at an early phase within the baseline research will help to streamline subsequent reviews of the research and will aid in the effort of braiding Western Science and Indigenous Knowledge. Participant funding will be required for this step.

		<ul style="list-style-type: none"> • IAAC/MFFN should engage AFN to conduct a TKLU Study concurrently with baseline studies to ensure Traditional Knowledge is meaningfully included at an early phase within the Impact Statement. • AFN will work collaboratively with IAAC to develop a confidentiality/sharing agreement, consistent with the principles of <i>Ownership, Control, Access and Protection (OCAP)</i> to ensure AFN's information is adequately protected while the development of the Impact Statement and subsequent phases of the Impact Assessment can proceed with appropriate information. • IAAC should provide participant funding to allow AFN to adequately participate in the co-development and review of the Impact Statement and all other activities affiliated with this phase of the regulatory process.
<p><i>Section 6: Engagement and Consultation Approach, Phase 2 (Impact Statement)</i></p>	<p>Due to the massive scale the potential impacts of the development of the Project may have on AFN, our Traditional Territory and the entire region, the Impact Statement should not be approved until it integrates the results of a completed Regional Assessment that covers all potential development in the entire James Bay Lowlands area. The Regional Assessment must be co-developed, co-implemented and co-enforced by a body of all the affected First Nations in the region. This will ensure that our consent to all or part of the Project, and to decisions made by IAAC related to the Impact Assessment, are made in a fully informed manner.</p>	<p>Table 1 of Section 6 should be amended to include the Agency's commitment to ensure the results of a completed Regional Assessment are integrated in to the Impact Statement prior to proceeding to Phase 3 of the Impact Assessment process.</p>
<p><i>Section 6: Engagement and Consultation Approach, Phase 2 (Impact Statement) and Phase 3 (Impact Assessment)</i></p>	<p>AFN notes that the Agency activities in Phase 2 describes the Agency seeking the views of Indigenous communities on how the Project's potential impacts on the exercise of their rights and discusses with Indigenous communities whether</p>	<p>It is AFN's position that the the completion of the assessment of impacts on the exercise of Aboriginal and Treaty rights should be completed collaboratively by IAAC and AFN during the Impact Statement phase of the Impact Assessment,</p>

	<p>the Proponent has adequately identified mitigation and/or accommodation measures, as appropriate, in its Impact Statement. However, AFN also notes that the completion of the assessment of impacts on the exercise of Aboriginal and Treaty rights is not listed as an activity until Phase 3 of the Impact Assessment.</p>	<p>concurrently with the Proponent’s development of the Impact Statement. The Agency’s activities in Phase 3 of the Impact Assessment should be amended to include a clear commitment to confirming with Indigenous communities that appropriate accommodation measures are in place with the Crown and the Proponent to address the Project’s potential impacts, prior to the Impact Assessment advancing to the Decision phase (Phase 4).</p>
<p><i>Section 6: Engagement and Consultation Approach, Phase 3 (Impact Assessment)</i></p>	<p>AFN notes that in the Decision phase, Table 1 sets out that the Agency will post the Minister’s decision statement online and distribute notifications by email. Further engagement activities are required during this phase of the Impact Assessment.</p>	<p>The Agency’s activities and engagement and consultation methods in this Phase should be amended to include a presentation by IAAC to AFN’s Chief and Council and to community members both on and off reserve. With the presentation, IAAC should summarize all avoidance, mitigation, and accommodation measures that will occur for AFN as well as opportunities for community members to participate in the Project.</p>
<p><i>Section 6: Engagement and Consultation Approach, Phase 5 (Post-Decision)</i></p>	<p>AFN notes that in the engagement and consultation activities described in the Post-Decision phase, there is no reference to the ongoing involvement in Project oversight, monitoring and compliance with IAAC.</p>	<p>Table 1 of Section 6 should be amended to include:</p> <ul style="list-style-type: none"> • Should a Monitoring Advisory Committee be established, AFN monitors must be directly involved in monitoring, planning and implementation for the entirety of the Project’s lifecycle. Monitors should report to the Monitoring Advisory Committee, in turn the Monitoring Advisory Committee should report back to the regulators of the Project. • IAAC should commit to providing capacity funding to support monitor-related training and employment.

Appendix 2: Review – Draft Tailored Impact Statement Guidelines

Section	Comment	Recommendation
<i>Section 2.3: Project Location</i>	The information required to be included in the Impact Statement, and where appropriate, located on map(s) does not provide for all information that may be available from Indigenous governments and Indigenous groups with respect to environmentally sensitive sites, habitats of species considered to be at risk by Indigenous governments and Indigenous groups, land designations considered within Indigenous land use plans, and potable water sources including spring water sources.	Section 2.3 should be revised to be inclusive of information that may be available to be publicly shared from Indigenous governments and Indigenous groups with respect to environmentally sensitive sites, habitats of species considered to be at risk by Indigenous governments and Indigenous groups, land designations considered within Indigenous land use plans, and potable water sources including spring water sources.
<i>Section 3.5 Project Activities</i>	The Project’s right-of-way are likely to incorporate other infrastructure. For example, the IESO recently published its <i>Integrated Regional Resource Plan</i> (January 2023), which alludes to a 230kV line from Longlac to McFaulds Lake being co-located along the Marten Falls Community Access Road, Webequie Supply Road and Northern Road Link to provide a North-South alignment for electricity supply to the Ring of Fire (Section 8.4.4). As a result, the project description should include any planned or anticipated co-location, construction, or site preparation anticipating construction, of additional right-of-way infrastructure such as, but not limited to, transmission lines, telecommunication infrastructure, pipelines, etc.	Section 3.5.1, Section 3.5.2 and Section 2.5.3 should be amended to include any planned or anticipated co-location, construction, or site preparation anticipating construction, of additional right-of-way infrastructure such as, but not limited to, transmission lines, telecommunication infrastructure, pipelines, etc.
<i>Section 6 Description of engagement with Indigenous communities</i>	In Section 6, the Guidelines set out the requirements for the proponent’s collaboration with Indigenous peoples in completing its Impact Statement. These requirements include supporting and funding the participation of Indigenous peoples, collecting and integrating Indigenous knowledge, sharing project information, and collaboratively identifying mitigation measures. The	Given the required level of involvement of Indigenous peoples in the development of the Impact Statement, IAAC should include the following addition in Section 6 (p. 25): <i>“In order to ensure the involvement of each Indigenous group in the development of the Impact Statement is appropriately facilitated, the proponent is expected to work with each of the groups in the list of Indigenous peoples identified in Section 4 of the</i>

	<p>Guidelines also identify that the Proponent is required to work with each Indigenous community identified in Section 4 of the Indigenous Engagement and Participation Plan to establish a mutually agreed approach to their participation in the development of the Impact Statement. AFN notes that while IAAC has developed a draft Indigenous Engagement and Partnership Plan which lays out their proposed approach to fulfilling their obligations to consult AFN, the proponent has not developed such an approach or agreement with AFN.</p>	<p><i>Indigenous Engagement and Partnership Plan to establish a mutually agreed upon approach to their involvement <u>prior to commencing any work related to the development of the Impact Statement.</u></i></p> <p>Further, the list setting out the primary responsibilities of the proponent to involve Indigenous peoples in the Impact Statement on p. 26 should be revised to include, “co-develop the list of Valued Components and indicators” and “co-develop mitigation measures and follow-up programs.”</p>
<p><i>Section 6 Description of engagement with Indigenous communities</i></p>	<p>In Section 6.2, the Guidelines include a requirement that the proponent demonstrate how Indigenous community’s views, knowledge, perspectives and input were integrated into the characterization of the nature of environmental, health, social and economic effects and impacts expected from the Project. Section 6.2 goes on to specify that the Impact Statement must provide “the rights of each Indigenous community, that the peoples themselves have identified” and “the views of Indigenous peoples regarding the extent of impact on the exercise of their rights, as well as how these effects or impacts may be avoided, managed, mitigated or accommodated” However, AFN notes that the draft Guidelines remain unclear with respect to the Proponent’s crucial responsibility of ensuring accommodation measures have been agreed upon with each Indigenous community that correspond with the impacts of the Project on their rights and interests.</p>	<p>IAAC should amend the Guidelines to describe the proponent’s obligation to identify appropriate benefit and accommodation measures with the Indigenous peoples identified, reading as follows, <i>“Where impacts of the project on the rights of Indigenous peoples have been identified, the proponent must confirm, prior to the submission of their Impact Statement, that mutually agreed upon accommodation and benefit measures have been agreed upon to address these impacts.”</i></p>

<p><i>Section 6.2 Analysis and response to questions, comments and issues raised</i></p>	<p>Article 32.1 of UNDRIP states that Indigenous Peoples shall be consulted in good faith through their own representative institutions in order to obtain their free and informed consent prior to the approval of any project affecting the community's lands or resources. The analyses and responses section should include the consideration of how/if consent has/will be sought.</p>	<p>In addition to, the analysis and responses outlined in the bulleted list, AFN recommends additional bullets be added specific to free, prior and informed consent:</p> <ul style="list-style-type: none"> • where and how the proponent supported Indigenous groups' free, prior and informed consent for the Project; • description of future activities and processes that consider and support Indigenous groups' free, prior and informed consent for the Project
<p><i>Section 6.2 Analysis and response to questions, comments and issues raised</i></p>	<p>AFN notes that Section 6.2 sets out various requirements for the Proponent to provide its own characterization of how the input received from Indigenous communities has informed the development of their Impact Statement, but does not require the Proponent to include the perspectives and validation of Indigenous communities about the information presented in the Impact Statement. Stating that "the Proponent should seek opportunities to validate its analysis with the Indigenous communities while developing the Impact Statement" is not worded strongly enough.</p>	<p>Section 6.2 of the Guidelines must set out a clear requirement that Indigenous peoples must be provided with the time, resources and opportunity to document Indigenous knowledge and land use information and <i>to verify that this information has been appropriately integrated into the Impact Statement before it is considered complete.</i></p>
<p><i>Section 7.2 Sources of baseline information</i></p>	<p>Indigenous government land use studies and management plans may be available; Indigenous forestry management plans may be available from Indigenous forest management bodies.</p>	<p>The list of sources of baseline information should be revised to include land use studies and management plans available from Indigenous governments as sources of baseline information, and Indigenous forestry management plans from Indigenous forest management bodies.</p>
<p><i>Section 7.4 Spatial and Temporal Boundaries</i></p>	<p>Section 7.4 of the Guidelines sets out the process for identifying spatial and temporal boundaries used for the impact assessment. Given the massive scale the potential impacts of the development of the Project may have on AFN, our Traditional</p>	<p>Section 7.4 should be revised to require the proponent to <i>co-develop</i> spatial and temporal boundaries used in assessing the potential adverse effects of the Project on each valued component with Indigenous groups to ensure that boundaries</p>

	<p>Territory and the entire region, <i>it is essential that spatial and temporal boundaries for the Project are required to be collaboratively identified with Indigenous groups.</i></p> <p>We are particularly concerned with the Initial Project Description's (IPD) characterization of the baseline environment and potential effects for Cultural Heritage Resources (Section 16.3), Aboriginal and Treaty Rights and Interests (Section 16.4) and Indigenous Physical and Cultural Heritage, Current Use of Lands and Resources for Traditional Purposes (Section 22) as the LSA and RSA for these areas of the Impact Assessment referenced in the IPD (see for example, p. 107) were not developed collaboratively with AFN or completed with any involvement of AFN. Study Area boundaries for these and other relevant components of the Impact Assessment must encompass the transportation corridor's connection to the provincial highway network to consider all of the possible direct and indirect effects of the Project to AFN. LSAs and RSAs presented to AFN in the context of the Provincial Environmental Assessment which we assume the conclusions presented in the IPD are based on have been entirely insufficient, only extending as far south as Ogoki Lake.</p>	<p>are mutually acceptable and that all potential impacts are adequately assessed.</p>
<p><i>Section 7.7 Cumulative Effects Assessment</i></p>	<p>Section 7.7 of the Guidelines identifies requirements for the Proponent to identify and justify spatial and temporal boundaries used in the cumulative effects assessment and projects to be considered as sources of potential cumulative effects. AFN notes that there is no mention of the</p>	<p>Section 7.7 must be revised to include requirements for the co-development of spatial and temporal boundaries used in cumulative effects assessment and collaboration with Indigenous groups in identifying projects that</p>

	involvement of Indigenous groups in the determination of these parameters to be used for the cumulative effects assessment.	should be considered as sources of potential cumulative effects.
<i>Section 8.6 Groundwater and surface water</i>	AFN notes that the information required in the draft Guidelines related to groundwater and surface water does not include any requirements for including the locations of springs and spring water. Springs and spring water are important to AFN and other Indigenous peoples, and may have spiritual value and value for land use and the exercise of Aboriginal and Treaty rights.	Section 8.6 should be revised to include a requirement to “identify all springs and any other potable surface water resources within the local and regional project areas and describe their current use, potential for future use, and whether their consumption has Indigenous cultural importance.”
<i>Section 8.11 Species at Risk</i>	There may be species noted as “at risk” by Indigenous groups that are not currently listed under the Species at Risk Act or provincial statutes. Indigenous groups may consider certain species to be at risk with respect to local and regional contexts, traditional territories, and harvesting practices and uses.	Section 8.11 of the Guidelines should be amended to include requirements to consider baseline conditions and potential impacts of the Project on species noted to be “at risk” by Indigenous groups. Further, Indigenous knowledge should be required to be included for identifying all species at risk and habitat, migration corridors, spawning areas, etc.
<i>Section 10.4 Rights of Indigenous Peoples</i>	Section 10.4 the Guidelines set out requirements for the characterization of baseline conditions and impacts on rights of Indigenous peoples. AFN notes that in the requirements for baseline conditions the Proponent is required to “consider and described pre-existing impacts and cumulative effects that are already interfering with the ability to exercise rights or pass along indigenous cultures and cultural practices.” However, there is not a parallel requirement to assess and describe the same when it comes to the impacts of the Project.	This requirement to characterize impacts to the ability of Indigenous groups to pass along traditional knowledge and cultural practices to future generations should be included as a requirement in Section 10.4.2.

<p><i>Section 10.4.1 Rights of Indigenous Peoples, Baseline Conditions</i></p>	<p>Understanding historic and current use are important sources of knowledge to inform baseline conditions. However, there should also be consideration of future goals and use and how the project may impact those long-term objectives. There are areas previously impacted by development activities that Aroland First Nation may seek to restore and reclaim. The Project may impact those long-term goals and should be considered alongside historic and current uses.</p>	<p>Section 10.4 should be amended to require that the impact of the Project on future goals, objectives and use of Indigenous communities related to Aboriginal rights and interests be considered as part of the assessment process.</p>
<p><i>Section 10.4.1 Rights of Indigenous Peoples, Baseline Conditions</i></p>	<p>The list of contextual information that may be considered should include an opportunity to develop other contextual factors that may be important for Project consideration. There is a risk that the proponent may interpret the list narrowly and AFN would like an opportunity to develop and add additional relevant information.</p>	<p>Please consider adding a bullet to the contextual information list that provides an open-ended opportunity for other important contextual information:</p> <ul style="list-style-type: none"> • other contextual information and/or factors that Indigenous groups identify as valuable for consideration.
<p><i>Section 10.4 Rights of Indigenous Peoples</i></p>	<p>AFN notes that baseline conditions, potential impacts of the Project on Aboriginal and Treaty rights and suitable mitigation and enhancement measures will be unique for each Indigenous community, and that presenting information about the exercise of rights and potential impacts for Indigenous peoples in general would not be appropriate.</p>	<p>The Guidelines should make clear that the Proponent will be expected to present the information required throughout Section 10.4 <i>for each Indigenous community</i> in Section 4 of the Indigenous Engagement and Partnership Plan.</p>