

Provincial Review Team – Comment Form – draft Cooperation Plan and draft Integrated Tailored Impact Statement Guidelines

Deep Geological Repository (DGR) for Canada’s Used Nuclear Fuel Project

Response required by: May 10, 2026

Please submit the completed form no later than May 10, 2026, via email to NuclearWaste-DechetsNucleaires@iaac-aeic.gc.ca

Ministry/Office:	Ministry of Natural Resources (MNR) – Dryden-Fort Frances-Atikokan District		
IA Contact:	Alexandra Hyatt (Regional Planner)	Telephone:	(807) 271-4239
		Email:	Alex.hyatt@ontario.ca

Section 1 – draft Cooperation Plan:

1. Indicate whether your Ministry or office has identified any legislative and regulatory oversight that may apply to the project and/or incidental activities related to the project, under the authority of your Ministry or office.
 - a. Provide any other comments related to the content of the draft Cooperation Plan, including the Approach to Cooperation and Information Sharing Opportunities sections.

Insert response here:

A proposal to grant permission by MNR may trigger a Duty to Consult with Indigenous communities if the activity authorized by the permission has the potential to adversely impact Aboriginal or treaty rights.

MNR has identified the following potential permissions:

- 1) License to Collect Fish for Scientific Purposes (LCFSP):
 - If applicable to the Project, a licence would be issued to allow for collection of fish for stormwater management pond maintenance and fish salvage during in-water infrastructure work
- 2) Wildlife Scientific Collector’s Authorization (WSCA):
 - If applicable for the Project, a permit would be issued for investigative studies associated with tissue samples.
- 3) Authorization to Interfere With/Destroy a Black Bear or Furbearing Mammal Den, Beaver Dam, Black Bear in a Den
 - During the construction and maintenance of access roads associated with the Project, there is a potential to require removal of beaver dams that present risk to infrastructure and safety, which would require a permit.
- 4) Authorization to destroy/take/possess nests and eggs
 - During site preparation or construction activities for the Project, there is the potential that nests or eggs require removal.
- 5) Wildland Fire Management Act
 - If applicable to the Project, a burn permit may be required to enable burning of materials from forest clearing between April 1 and October 31.
- 6) Public Lands Act (PLA)
 - A disposition of Crown land will be required for this project.
- 7) Land Use Agreement

- A land use agreement to use and occupy provincial public lands under the authority of the MNR minister.

In Appendix 2, Table A2: Ministry Regulatory Mechanism References

Please remove:

MNR's Class Environmental Assessment for Resource Stewardship and Facility Development Projects (Class EA-RSFD).

2. In the table below, please provide all applicable provincial EA requirements, permitting and/or approval requirements that may apply to the project and/or incidental activities related to the project, under the authority of your Ministry or office.

Provincial Ministry or Office (e.g., Ministry of Environment, Conservation and Parks)	Regulatory Mechanism (Identify applicable provincial EA, permitting or approval requirements)	Reference (Provide link with additional information on provincial regulatory mechanism identified)
Ministry of Natural Resources	License to Collect Fish for Scientific Purposes (LCFSP) under the Ontario Fisheries Regulations, 2007 (under the federal Fisheries Act)	Licence to collect fish for scientific purposes ontario.ca
Ministry of Natural Resources	Wildlife Scientific Collector's Authorization (WSCA) under the Ontario Fish and Wildlife Conservation Act	Application for a Wildlife Scientific Collectors Authorization - Forms - Central Forms Repository (CFR)
Ministry of Natural Resources	Land Disposition under the Public Lands Act	Application review and land disposition process policy ontario.ca
Ministry of Natural Resources	A Land Use Agreement to use and occupy provincial public lands under the authority of the MNR Minister.	N/A
Ministry of Natural Resources	Authorization to Interfere With/Destroy a Black Bear or Furbearing Mammal Den, Beaver Dam, Black Bear in a Den	https://www.ontario.ca/laws/statute/97f41/v8
Ministry of Natural Resources	Authorization to destroy/take/possess nests and eggs	Remove bird nests or eggs ontario.ca
Ministry of Natural Resources	Burn Permit under the Wildland Fire Management Act	Outdoor fire rules and permits ontario.ca

Insert as many rows as applicable

- Using the table below, please provide areas of expertise related to the project and appropriate contact information for the final Cooperation Plan and further cooperation on the integrated assessment of the project.

Provincial Ministry or Office (e.g., Ministry of Environment, Conservation and Parks)	Areas of Expertise (Provide a list of areas of expertise that your ministry/office holds)	Contact Information (Department name, address, telephone number, contact email address)
Ministry of Natural Resources	<ul style="list-style-type: none"> Sustainably manage Ontario’s natural resources including fish, wildlife, provincial crown lands and forests, water, oil, gas, salt, and aggregates. Protects people, property and communities from forest fires, floods, and droughts. Committed to fulfilling the duty to consult and where appropriate, accommodate with First Nation and People. 	<p>Dryden-Fort Frances-Atikokan District Dryden Work Centre 479 Government Street, Dryden, P8N 3K9</p> <p>Northwest Region LUPSIS Regional Planner: Alex.Hyatt@ontario.ca</p> <p>Dryden-Fort Frances-Atikokan District IRM Technical Specialist: Rebecca.Ascott@ontario.ca</p>

Section 2 – draft Tailored Impact Statement Guidelines:

If any legislative and regulatory oversight that may apply to the project and/or incidental activities related to the project, under the authority of your Ministry or office, was identified in Section 1:

- Please review the [draft Integrated Tailored Impact Statement Guidelines](#) (the Integrated Guidelines) sections that are applicable to your Ministry’s or office’s mandate.
- Using the table below, given the context of the project, please provide any comments and include your recommendation for how the final Integrated Guidelines should be adapted to address information requirements of your Ministry’s or office’s regulatory mechanisms in order to reduce duplicative provincial and federal requirements.
 - Please indicate any corrections, additions or deletions that should be made to the text including considerations of submissions from Indigenous Nations and communities that are relevant to your Ministry’s or office’s expertise. Please provide a clear context and rationale for your recommendations, including how their implementation would help focus the assessment on key issues relevant to federal decision-making. Provincial expert advice should be solution oriented and commensurate to the context of the Project. Advice should be informed by risk-based prudence and evidence in the proponent’s [Initial Project Description](#), [Summary of Issues](#), [Response to the Summary of Issues](#) (along with supplemental [Consolidated Information on Transportation of Used Fuel – Plain Language](#)), and publicly available information, with a strong reliance on well-understood mitigation measures, existing guidance, and regulatory instruments that will manage effects. In doing so, ministries are encouraged to focus on identifying areas

where additional information requirements may be necessary and to avoid duplication with existing provincial regulatory instruments. Where potential effects can be effectively addressed through your existing provincial mechanisms, please identify these and consider opportunities to streamline the draft Integrated Guidelines, including proposing the removal or consolidation of requirements, as appropriate.

Ministry – Comment ID (e.g., MECP-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.
MNR-01	6.1.2 Effects to terrestrial, riparian, and wetland environments	<p>Given the transportation of materials that will occur from various locations in Canada, the potential introduction and spread of invasive and introduced species should be assessed.</p> <p>Section 6.1.1 indicates that description of any weed species, other invasive and introduced species of concerns will occur. However, section 6.1.2 does not assess the potential effects of invasive species on the environment. Studies clearly demonstrate that invasive species can significantly affect biodiversity, as well as the abundance and distribution of native species. Consideration should therefore be given to inclusion of the biosecurity, mitigation, and monitoring measures for all phases of the Project, to ensure that potential adverse effects are mitigated and where necessary, addressed and monitored.</p>	Inclusion in Section 6.1.2 of an assessment of potential environmental effects associated with invasive and introduced species, including effects on native biodiversity and ecosystem function.
MNR-02	6.1. Terrestrial, riparian, and wetland environments	<p>The Initial Project Description describes several values of Significant Wildlife Habitat (candidate and/or confirmed) specific vegetation communities within the Project study area. Further studies are required assess the presence of significant and rare vegetation communities as indicated the Initial Project Description.</p> <p>In conducting baseline studies and completing the assessment,</p>	Recommend that the Impact Statement Guidelines include direct reference to the Significant Wildlife Habitat (candidate and/or confirmed) as identified in the Initial Project Description to ensure that sufficient information is gathered to clearly assess potential effects on these values. Ontario’s applicable guidelines and tools would support an effective assessment of Significant Wildlife Habitat in a matter that aligns with MNR’s values and interests.

Ministry – Comment ID (e.g., MECP-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.
		Ontario’s Significant Wildlife Habitat Technical Guide and Mitigation Support Tool can be used to effectively complete the assessment. Additional information relating to how these values are assessed and consider in developments can be found in Ontario’s Natural Heritage Reference Manual.	
MNR-03	6.2 Fish and Fish Habitat	<p>MNR has responsibilities under the Planning Act to manage and protect natural resources, biodiversity, and ecosystems, their fisheries management plans and a mandated role under the Fish and Wildlife Conservation Act, 1997 to ensure the long-term sustainability of fish populations.</p> <p>To minimize impacts on watercourses and fish populations, MNR’s practice is to apply the applicable timing windows for in-water works, as outlined in the “Ontario Restricted Activity Timing Windows for the Protection of Fish and Fish Habitat”. It is currently unclear whether these timing windows will be followed for all in-water activities associated with this project. If adherence to these windows will not be possible for all works (e.g., due to construction scheduling constraints) the potential impacts on local fish populations should be clearly identified and addressed.</p>	<p>Please include in the Impact Statement Guidelines an assessment of net and cumulative effects on fish populations if work may need to occur during the restricted activity timing windows. If adherence to the timing windows (“Ontario Restricted Activity Timing Windows for the Protection of Fish and Fish Habitat”) is not possible, then potential impacts to fish populations should be assessed.</p> <p>This will assist with ensuring that impacts of concern, as per MNRs mandated interests, have been assessed.</p>
MNR-04	6.2 Fish and Fish Habitat	MNR has responsibilities under the Planning Act to manage and protect natural resources, biodiversity, and ecosystems, their fisheries management plans and a mandated role under the Fish and Wildlife Conservation Act, 1997 to ensure the long-term sustainability of fish populations.	It is recommended that the Impact Statement Guidelines, and subsequent Impact Assessment, includes an assessment of net (and cumulative if applicable) effects on sensitive fish populations resulting from the removal of riparian vegetation along watercourses. This should consider associated changes in water

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		Removal of riparian vegetation may be required to facilitate site development. This has the potential to increase watercourse temperatures, which may negatively impact fisheries populations. Cold water species and streams are particularly sensitive to temperature changes resulting from loss of shading provided by riparian vegetation.	temperature and their potential impacts on fish populations. This will assist with ensuring that impacts of concern, as per MNRs mandated interests, have been assessed.
MNR-05	6.3 Birds and their habitat	<p>The Initial Project Description describes several values of Significant Wildlife Habitat (candidate and/or confirmed) specific bird habitat within the Project study area. Further studies are required to assess the presence of significant and rare vegetation communities as indicated in the Initial Project Description.</p> <p>In conducting baseline studies and completing the assessment, Ontario’s Significant Wildlife Habitat Technical Guide and Mitigation Support Tool can be used to effectively complete the assessment. Additional information relating to how these values are assessed and considered in the context of development can be found in Ontario’s Natural Heritage Reference Manual.</p>	<p>Recommend that the Impact Statement Guidelines include reference to the Significant Wildlife Habitat (candidate and/or confirmed) as identified in the Initial Project Description to ensure that sufficient information is gathered to clearly assess potential effects on these values.</p> <p>Incorporating reference to Ontario’s applicable guidelines and tools would support an effective assessment of Significant Wildlife Habitat in a matter that aligns with MNR’s values and interests.</p>
MNR-06	6.4. Terrestrial wildlife and their habitats 6.4.1 Baseline conditions 6.4.2 Effects to terrestrial wildlife and their habitat	<p>MNR mandate and interests include enabling sustainable, healthy populations of native wildlife to support Ontario’s conservation, recreational, and Indigenous harvests.</p> <p>The Fish and Wildlife Conservation Act (FWCA) and its associated regulations and schedules provide protection for wildlife in Ontario. Ontario Regulation 669/98:</p>	<p>Recommend that the Impact Statement Guidelines include direct reference to the Significant Wildlife Habitat (candidate and/or confirmed) as identified in the Initial Project Description to ensure that sufficient information is gathered to clearly assess potential effects on these values. Incorporating reference to Ontario’s applicable guidelines and tools would support an effective assessment of</p>

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		<p>(Wildlife Schedules) identifies species protected in the FWCA. This legislation applies to all lands and water in Ontario, regardless of ownership.</p> <p>The Initial Project Description describes several values of Significant Wildlife Habitat (candidate and/or confirmed) within the Project study area. Further studies are required to assess the presence and extent of Significant Wildlife Habitat; however, Section 6.1.1 does not clearly articulate this requirement.</p> <p>In conducting baseline studies and completing the assessment, Ontario’s Significant Wildlife Habitat Technical Guide and Mitigation Support Tool can be used to support a consistent and effective assessment. Additional guidance regarding the identification, evaluation, and consideration of these values in the context of development is provided in Ontario’s Natural Heritage Reference Manual.</p>	<p>Significant Wildlife Habitat in a matter that aligns with MNR’s values and interests.</p>
MNR-07	<p>6.4. Terrestrial wildlife and their habitats</p> <p>6.4.1 Baseline conditions</p> <p>6.4.2 Effects to terrestrial wildlife and their habitat</p>	<p>Key changes may occur to wildlife species that are important for current use of lands and resources.</p> <p>Large game species, including ungulates (moose and deer) and bear, are managed at large spatial scales. Their habitat, including areas of Significant Wildlife Habitat, has the potential to be affected by habitat loss and fragmentation, as well as sensory disturbance (such as noise and vibration) associated with Project activities. Individuals may also experience increased mortality risk due to vehicle collisions and changes in harvest pressure</p>	<p>Recommend that Sections 6.4.1 and 6.4.2 of the Impact Statement guidelines address the use and harvesting of large game species (e.g., moose, deer, and bear) and require assessment of potential effects on these species associated with project activities over the life of the Project.</p>

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		<p>arising from new or altered access, increased human presence and associated workforce demographics and origin.</p> <p>Given the long operational life of the Project, these effects may accumulate over time and result in long-term effects to species distribution and use.</p>	
MNR-08	<p>Biological Environment-Section 6 Including, 6.1.1 Terrestrial, riparian, and wetland environments – Baseline conditions; 6.2 Fish and fish habitat; 6.3 birds and their habitat; 6.4 Terrestrial wildlife and their habitat.</p>	<p>MNR has knowledge of landscape values through its planning and resource management activities, which considers vegetation communities, wildlife, and birds.</p> <p>As a result, MNR maintains information on natural heritage features (e.g., sensitive areas), fish species presence, and terrestrial wildlife features (e.g., mineral licks and nests), including occurrences of sensitive areas from provincially available dataset. Data is routinely updated as new information is obtained.</p>	<p>There is an opportunity to work together and share this data to assist in delineating features of provincial importance and to compliment data collection activities.</p> <p>Recommendation: To work with MNR to obtain this information to help inform baseline conditions for the study areas. Data sharing agreement is requirement for sensitive data exchange and use. In addition, it is recommended that 6.1.1 acknowledges that data sharing will occur with provincial ministries.</p>
MNR-09	<p>Requested addition – please add to the applicable section of the guidelines.</p>	<p>MNR’s practice for projects with the potential to significantly affect public use of the area is to ensure that the interests of stakeholders on the landscape are considered, including businesses and resource users that may be directly impacted.</p> <p>The document should be updated to assess and address potential impacts to these parties, including commercial fishing operators, baitfish harvesters, trappers, and outfitters. Outfitters within MNRs area of interest include those providing recreational fishing opportunities, those holding Bear Management Areas for hunting, and those offering moose hunting guiding services.</p>	<p>Recommend that the Impact Statement Guidelines include consideration and assessment of potential impacts on the economic conditions of individuals or businesses that use lands and water bodies for economic activities in the applicable study areas. This assessment should consider the volume and area of terrestrial and aquatic habitat that will be lost as a result of the works on the site. This assessment should also consider changes to access for these resource users, and include the amount of area that would no longer be accessible as a result of the project. This should include activities such as recreational and commercial fishing, baitfish harvesting, trapping, and tourist outfitters. It is also recommended that all potentially</p>

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			<p>affected operations be identified, including bear management areas, bait fish harvest areas, traplines, and outfitter operations within the impacted area.</p> <p>This information should be included in the relevant section of the Impact Statement Guidelines.</p> <p>Identifying these interests will support timely consultation and/or notification during the permitting stage and help prevent delays in the review process.</p>
MNR-10	Section 6.0 – Various VC components within this section (Terrestrial, riparian and wetland environments; Fish and Fish Habitat; Birds and their habitat; Terrestrial wildlife and their habitat)	<p>MNR has a mandated interest in several Valued Components outlined in Section 6.0 of the draft Impact Statement Guidelines. With respect to terrestrial, riparian, and wetland environments, MNR has responsibilities under the Planning Act to manage and protect natural resources, biodiversity, and ecosystems. MNR also has an interest in ensuring the sustainability of fish populations in accordance with applicable fisheries management plans, and a mandated responsibility for terrestrial wildlife and habitat under the Fish and Wildlife Conservation Act, 1997.</p> <p>MNR requests greater clarity and consistency in how mitigation measures are assessed and presented throughout the document. While mitigation measures are discussed in Section 9 it is not clear how potential effects on the Valued Components identified in Section 6 will be addressed though mitigation across all project phases (e.g., construction and operations). Clear articulation of mitigation measures is important to</p>	<p>Recommend that the Impact Statement Guidelines clarify the extent to which mitigation measures are expected to be detailed within the Impact Assessment. Where mitigation measures are not intended to be fully described within the Guidelines or the Impact Assessment, MNR recommends that the development of standalone document(s) (e.g. management, mitigation and monitoring plans) be clearly identified, including when these documents will be prepared and how they will be used to address anticipated project effects.</p> <p>MNR further recommends that opportunities be provided for review and input on these document(s).</p> <p>Providing this information would support MNR’s ability to assess potential effects within its mandate, identify concerns early and provide timely input to inform mitigation and subsequent permitting decisions. advance.</p>

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		<p>complement the net and cumulative effects assessments and to support MNR’s review of potential impacts within its area of responsibility.</p>	
MNR-11	Biological Environment- Section 6	<p>MNR has a mandated interest in several components outlined in Section 6.0. With respect to birds and wildlife, MNR has responsibilities under the Planning Act to manage and protect natural resources, biodiversity, and ecosystems. MNR also has a mandated role under the Fish and Wildlife Conservation Act, 1997 for the management of terrestrial wildlife, habitat, and birds.</p> <p>Additional information is requested to clarify how waste will be managed throughout all phases of this Project (e.g. construction and operation), particularly with respect to potential effects on surface water, wildlife habituation, and human-wildlife interactions. These potential effects should be assessed for both net and cumulative impacts.</p> <p>Wildlife is likely to be present within the project area, which creates potential for human-wildlife conflicts and movement barriers (e.g., snow accumulation along roads). Additional information is requested on the net and cumulative effects of these interactions, including risks of vehicle collisions and nuisance wildlife (e.g., bears) and associated mortality, and the use of on-site water management ponds on site by birds.</p>	<p>Recommend that the Impact Statement Guidelines require additional information on how waste generated during all phases of the project (e.g., construction and operations) will be managed. This should include consideration of potential effects on surface water, wildlife habituation, and human-wildlife interactions, as well as assessment of the net and cumulative effects of these interactions and applicable mitigation measures. In addition, it is recommended that the Guidelines require assessment of net and cumulative effects- along with applicable mitigation measures - related to interactions with birds and wildlife that may occur during construction and operations. This should include human-wildlife conflict, movement barriers, wildlife collisions, mortality risks, nuisance wildlife (e.g., bears), and the use of on-site water management ponds by birds.</p> <p>Including this information in the Impact Statement Guidelines would support a comprehensive assessment of potential project effects and early consideration of mitigation approaches, helping to inform future permitting and approvals and reduce the risk of project delays.</p>
MNR-12	Section 6.4 – Terrestrial	MNR has responsibilities under the Planning Act to manage and protect natural resources,	Recommend that the Impact Statement Guidelines provide the opportunity for MNR to participate in

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	wildlife and their habitat.	<p>biodiversity, and ecosystems, as well as a mandated role under the Fish and Wildlife Conservation Act, 1997. In carrying out these responsibilities, MNR considers habitats of significance – including significant wildlife habitat and specialized habitat for wildlife and species of conversation concern-during planning.</p> <p>Further clarification is requested on what habitat types will be defined as “sensitive areas” within the Impact Assessment (IA) Guidelines and associated impact assessment. MNR recommends that significant wildlife habitat and specialized habitat for wildlife and species of conversation concern is included as “sensitive areas” habitat in the IA Guidelines.</p> <p>To support a consistent and effective assessment, Ontario’s Significant Wildlife Habitat Technical Guide and Mitigation Support Tool and Ontario’s Ecological Land Classification should be used. Additional guidance on how these values are assessed and considered in the context of development can be found in the Natural Heritage Reference Manual.</p> <p>Examples of habitats that may warrant consideration as sensitive areas include waterfowl staging and stopover areas for migratory birds, amphibian breeding habitat, snake hibernaculum, nesting areas for turtles, milkweed patches, wild rice, moose aquatic feeding habitat, mineral licks, mammal denning sites, marsh bird breeding habitat, shorebird migratory site, bat hibernaculum and maternity</p>	<p>defining what areas will be considered as “sensitive areas” for the purposes of the Impact Assessment, including the opportunities for review and input on the identification and selection of these areas.</p> <p>It is further recommended that the Guidelines include candidate significant wildlife habitat (SWH), and specialized habitat for wildlife and species of conversation concern within the definition of “sensitive areas” for both the impact assessment and associated mitigation measures. This direction should be included in the Guidelines and applied in the Impact Assessment.</p> <p>Use of Ontario’s guidance documents to define these habitats is recommended, as this would support the development of an effective wildlife assessment that aligns with MNR’s values and interests. This approach would also help ensure that habitats of concern or rarity in Ontario are appropriately considered in the assessment of net and cumulative effects. For example, wild rice is of economic, cultural, and ecological importance, including its role as a key food source for migrating birds.</p> <p>It is also recommended that the Guidelines encourage use of the forest resources inventory (FRI) to support Ecological Land Classification (ELC) delineation during site investigation. The FRI provides information about forests and trees, including species distribution, stand composition, and tree age and includes attributes for predicted primary ecosites (PRI-ECO). Use of FRI data would assist in identifying PRI-ECO values as part of the ELC delineation. The Guidelines should also note that ecosites delineations are determined from</p>

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		colonies, and rare and subnational rank S1-S3 species or habitat.	aerial photo interpretation with a random field verification component and are largely based on overstory conditions. As a result, on the ground conditions may differ depending on local site conditions. For example, wetlands are typically associated with ecosites 127 and above; however, ecosite 116 may represent moist conditions and may warrant further field identification. Such sites may therefore require additional consideration to determine where they should be classified as a wetland or otherwise treated as sensitive areas.
MNR-13	6.1.1 Terrestrial, riparian, and wetland environments – Baseline conditions	<p>MNR has responsibilities under the Planning Act to manage and protect natural resources, biodiversity, and ecosystems. Furthermore, wetlands are Natural Heritage features and/or areas within the province that are fundamental to meeting goals identified in our strategic direction (Natural Heritage Reference Manual, 2010).</p> <p>The method for overall assessment (Wetland Ecological Functions Assessment: An Overview of Approaches or any subsequent approved guidelines ...) for function has been indicated in the document. However, it is not clear which method(s) will be used to assess individual wetlands within the Impact Assessment.</p> <p>Some wetlands are of provincial concern to Ontario (Provincially Significant Wetlands), with their identification accomplished through the Ontario Wetland Evaluation System (OWES) tool - the northern manual. If an alternate method of wetland delineation, then the importance</p>	<p>To ensure the importance of individual wetlands are captured at a provincial scale, it is recommended that assessment of wetlands is done utilizing the Ontario Wetland Evaluation System (OWES) tool - northern manual- for any wetlands over 2 hectares that is within 120m of the Project Area. Request that use of the OWES evaluation is acknowledged and added in section 6.1.1.</p> <p>Recommend that the Impact Statement Guidelines encourage use of Ontario’s guidance documents to define these habitats, which will assist with developing an effective assessment that aligns with MNR’s values and interests. This will also assist with ensuring that significant wetlands in Ontario are included in the net and cumulative impact assessment.</p> <p>Recommend that the Impact Statement Guidelines include the amount of area of wetland that will be lost, drained, or inaccessible as a result of the project.</p>

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		<p>of individual wetlands may not be captured at a provincial scale.</p> <p>In addition, peatlands are also unique and important wetland habitats due to their storage of carbon, biodiversity, and regulating water flow. It is recommended, that peatlands are also identified.</p>	
MNR-14	<p>Section 6.4 – Terrestrial wildlife and their habitat. And 6.1.1 Terrestrial, riparian, and wetland environments</p>	<p>MNR has responsibilities under the Planning Act to manage and protect natural resources, biodiversity, and ecosystems, and a mandated role under the Fish and Wildlife Conservation Act, 1997.</p> <p>Further clarification is requested regarding whether net effects will be assessed for wildlife and wildlife habitat as well as terrestrial, riparian and wetland environments within the relevant sections of the Impact Assessment Guidelines.</p> <p>While net effects assessments are identified for several valued components, it is currently unclear whether a similar assessment is intended for wildlife and their habitat and for terrestrial, riparian, and wetland environments.</p>	<p>Recommend that the Impact Statement Guidelines clarify whether net effects, including the determination of significance within the Local Study Area (LSA) and Regional Study Area (RSA), will be assessed for terrestrial wildlife and their habitat, as well as terrestrial, riparian and wetland environments. It is further recommended that net effects be assessed for each relevant valued component.</p> <p>Providing this direction would help ensure that potential project effects are consistently assessed, clearly understood, and appropriately considered in relation to MNR’s mandates and areas of responsibility.</p>
MNR-15	<p>Section 6.0 – Various VC components within this section (Terrestrial, riparian and wetland environments; Fish and Fish Habitat; Birds and their habitat;</p>	<p>MNR has a mandated interest in several valued components outlined in Section 6.0 of the draft Impact Statement Guidelines. With respect to terrestrial, riparian, and wetland environments, MNR has responsibilities under the Planning Act to manage and protect natural resources, biodiversity, and ecosystems. MNR also has an interest in ensuring the sustainability of fish populations</p>	<p>Recommend that the Impact Statement Guidelines require assessment of cumulative effects for each Valued Component. Clarification is also requested regarding the methodology that will be used to conduct the cumulative effects assessment.</p> <p>Providing this clarity would help ensure that that potential project</p>

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	Terrestrial wildlife and their habitat).	<p>in accordance with applicable fisheries management plans, and a mandated responsibility for terrestrial wildlife and habitat under the Fish and Wildlife Conservation Act, 1997.</p> <p>It is unclear within the Impact Statement Guidelines whether these Valued Components, will be assessed for cumulative effects once baseline data have been collected, described, and quantified.</p>	effects are fully considered and understood.
MNR-16	Section 6.4 – Terrestrial wildlife and their habitat.	<p>MNR has responsibilities under the Planning Act to manage and protect natural resources, biodiversity, and ecosystems, and a mandated role under the Fish and Wildlife Conservation Act, 1997.</p> <p>The existing disturbances within the Regional Study Area (RSA), such as mining activities, and their contribution to habitat fragmentation are not clearly described. As a result, the overall level of disturbance within the RSA, including from the proposed project, is unclear.</p>	<p>Recommend that the Impact Statement Guidelines include information summarizing existing and foreseeable major projects (e.g., mines) within the RSA near the project area.</p> <p>It is further recommended that existing disturbances, together with the proposed project, are considered at the RSA scale to assess the overall level of disturbance and the net and cumulative effects of development.</p> <p>Providing this information will help ensure that that all potential project effects are fully considered and understood.</p>
MNR-17	Section 6.4 – Terrestrial wildlife and their habitat. And 6.3 Birds and their habitat.	<p>MNR has responsibilities under the Planning Act to manage and protect natural resources, biodiversity, and ecosystems, and a mandated role under the Fish and Wildlife Conservation Act, 1997.</p> <p>Further clarity and consistency are requested regarding baseline data collection. For all Valued Components, the Guidelines should clearly state that proponents must justify whether existing information and recent field surveys are sufficient to support assessment of potential</p>	<p>Recommend that the Impact Statement Guidelines ensure that sufficient baseline data has been collected to support assessment of potential effects for Section 6.3 and 6.4.</p> <p>It is further recommended that the following sentence is included in Section 6.3 and 6.4: “Justify whether existing information and recent field habitat surveys are sufficient to support the assessment of likely residual and cumulative effects on the terrestrial species identified and to determine the extent to which these effects are significant</p>

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		<p>residual and cumulative effects, including determination of effect significance, while appropriately considering uncertainty, bias, and spatial and temporal representation.</p> <p>Where existing information and surveys are not sufficient, the Guidelines should clearly indicate that additional field investigations are required to adequately support the assessment.</p>	<p>considering uncertainties and bias, as well as spatial and temporal representation, in the baseline. If not sufficient, conduct and include additional surveys,”</p> <p>Including this direction would help ensure that baseline datasets are robust and adequate to support assessment of net and cumulative effects, as well as the development of appropriate mitigation measures.</p>
MNR-18	Section 6.3 Birds and their habitat.	<p>MNR has responsibilities under the Planning Act to manage and protect natural resources, biodiversity, and ecosystems, and a mandated role under the Fish and Wildlife Conservation Act, 1997.</p> <p>The species proposed to inform and support the Impact Statement Guidelines, and to serve as the focus of the assessment, have not been clearly identified. MNR has an interest in providing input on the selection of these species, including consideration of whether they adequately represent a range of habitats and ecological functions.</p>	<p>Recommend that the Impact Statement Guidelines provide additional clarity on the groups and specific species proposed to serve as indicators for this project (e.g., serve as the focus of the effects assessment).</p> <p>It is recommended that selected species represent various habitats and ecological functions which may include raptors, waterfowl, shorebirds, and/or forest-dwelling species.</p> <p>MNR also recommends being provided the opportunity to participate in determining the final species and groupings, and to provide input through the review of future documents.</p>
MNR-19	6.2 – Fish and fish habitat	<p>MNR has responsibilities under the Planning Act to manage and protect natural resources, biodiversity, and ecosystems. With respect to fish, MNR also has an interest in ensuring the sustainability of fish populations in accordance with applicable fisheries management plans.</p> <p>The species proposed to support the Impact Statement Guidelines, and to serve as the focus of the assessment, have not been clearly identified.</p>	<p>Recommend that the Impact Statement Guidelines require assessment of potential effects on, lake trout populations, including consideration of appropriate mitigation measures. Lake trout are sensitive to development-related disturbances (e.g. sedimentation and changes in angling pressure) and are an important recreational sportfish species with significant public and management interest. MNR also recommends being provided with opportunities to review and provide input on future documents.</p>

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		Lake trout are a particularly sensitive species that may be affected by development, including sedimentation and changes in angler pressure.	
MNR-20	Section 6.4 – Terrestrial wildlife and their habitat.	<p>MNR has responsibilities under the Planning Act to manage and protect natural resources, biodiversity, and ecosystems, and a mandated role under the Fish and Wildlife Conservation Act, 1997.</p> <p>The species that will be used to support this Impact Statement Guidelines, and to serve as the focus of the assessment, have not been clearly identified.</p> <p>MNR has an interest in providing input regarding the groups and species chosen, including whether they represent a range of habitats and ecological functions.</p>	<p>Recommend that the Impact Statement Guidelines provide additional clarity on the groups and specific species that will be used as indicators for this project (e.g., serve as the focus of the effects assessment).</p> <p>It is recommended that selected species represent various habitats and ecological functions which may include bats, amphibians, reptiles, ungulates, furbearer species, significant wildlife habitat, species of conversation concern (S1-S3).</p> <p>MNR also recommends being provided the opportunity to participate in determining the final species and groupings, and to provide input through the review of future documents.</p>
MNR-21	Section 6.4 – Terrestrial wildlife and their habitat.	<p>MNR has responsibilities under the Planning Act to manage and protect natural resources, biodiversity, and ecosystems, and a mandated role under the Fish and Wildlife Conservation Act, 1997 with respect to fur bearers.</p> <p>The draft Impact Statement Guidelines reference the economic use of furbearers; however, they do not clearly specify requirements to assess potential impacts on this group from an ecosystem and biodiversity perspective. To support a comprehensive effects assessment baseline data collection and the selection of appropriate indicator species for furbearers should be considered</p>	<p>Recommend that the Impact Statement Guidelines require assessment of furbearer species from a biological and ecological perspective, including assessment of potential net and cumulative effects associated with the Project.</p> <p>The Guidelines should also identify the need to select appropriate furbearer indicator species to serve as the focus of the effects assessment. Selected indicator species should represent a range of habitats and ecological functions and may include, for example, beaver, marten, and/or fisher.</p> <p>MNR also recommends being provided with opportunities to participate in the identification of indicator species and</p>

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		<p>to assess net and cumulative effects of the Project. Furbearers play important ecological roles (e.g., water management within the natural systems) and have cultural significance, beyond their economic value.</p>	<p>to review and provide input on future documents.</p> <p>Including this direction in the Impact Statement Guidelines would help ensure that potential project effects on furbearers are fully considered and understood in a manner consistent with MNR’s mandate and area of responsibility.</p>
MNR-22	6.4 Terrestrial wildlife and their habitat	<p>MNR has responsibilities under the Planning Act to manage and protect natural resources, biodiversity, and ecosystems, and a mandated role under the Fish and Wildlife Conservation Act, 1997.</p> <p>In Ontario, planning considerations may include maintaining amphibian and cervid movement corridors. The Project has the potential to create barriers to wildlife movement, including the loss of travel corridors (e.g., those that allow wildlife to move around Project disturbances) and reduced connectivity between habitats.</p> <p>While the draft Impact Statement Guidelines indicate that movement patterns will be evaluated, further clarification is requested to ensure that the assessment also considers the effect of travel corridor loss on habitat connectivity and species’ ability to move between preferred habitats.</p>	<p>Recommend that the Impact Statement Guidelines require assessment of effects associated with reduced habitat connectivity and impeded wildlife movement within the project footprint.</p> <p>With respect to mitigation, it is recommended that the Guidelines encourage consideration of site design and planning measures that can reduce impacts on wildlife movement and habitat connectivity. Including this direction in the Impact Statement Guidelines would ensure that that all potential project impacts are fully considered and understood, in a manner consistent with MNR’s mandate.</p>
MNR-23	Biological 6.0: 6.1 Terrestrial wildlife and their habitat And 6.3 Birds and their habitat	<p>MNR has responsibilities under the Planning Act to manage and protect natural resources, biodiversity, and ecosystems, and a mandated role under the Fish and Wildlife Conservation Act, 1997.</p>	<p>Recommend that the Impact Statement Guidelines require assessment of potential effects on wildlife and bird species during sensitive periods (e.g., breeding, nesting, denning), when some species may be unable to leave the area. The</p>

Ministry – Comment ID (e.g., MECP-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.
		<p>Wildlife species are more sensitive to disturbance during certain life stages, such as when young are not mobile or when species rely on specific habitats (e.g., breeding ponds).</p> <p>It is unclear whether the draft Impact Statement Guidelines require assessment of potential effects during these sensitive periods, including habitat loss or disturbance at times when species may be unable to relocate. In addition, noise and vibration associated with Project activities may affect breeding success for wildlife and birds. Clarification is requested on whether these potential effects will be assessed for applicable species within the Impact Assessment.</p>	<p>effects should be assessed for applicable species.</p> <p>It is also recommended that the Guidelines direct identification of appropriate mitigation measures to avoid or minimize effects during sensitive periods. Such measures may include identification and avoidance of breeding or denning habitats, implementation of timing restrictions or sensitive activity windows.</p> <p>Including this direction in the Guidelines would help ensure that all potential project impacts to wildlife and birds within MNR’s mandate are fully considered and understood. It would also support early engagement and timely feedback on mitigation measures, helping to identify key considerations and preferred approaches to inform future permitting and approvals and reduce the risk of project delays.</p>
MNR-24	6.2 Fish and Fish Habitat	<p>MNR has a mandated interest in several valued components outlined in Section 6.0 of the draft Impact Statement Guidelines. With respect to terrestrial, riparian, and wetland environments, MNR has responsibilities under the Planning Act to manage and protect natural resources, biodiversity, and ecosystems. MNR also has an interest in ensuring the sustainability of fish populations in accordance with applicable fisheries management plans.</p> <p>Assessment of existing slope conditions would be beneficial to support the establishment the baseline conditions and to inform future restoration activities. Clarification is requested regarding whether the slope angle</p>	<p>It is recommended that the Impact Statement Guidelines require stream assessments to include key parameters outlined in Ontario’s Stream Assessment Protocol, including documentation of baseline slope conditions (e.g., slope angle) prior to disturbance.</p> <p>Including this direction would support early engagement by enabling MNR to provide input at the earliest opportunity. It would also help identify key considerations relevant to future permitting and approvals, reducing the risk of project delays.</p>

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		will be assessed as part watercourse inventories. Use of Ontario’s Stream Assessment Protocol is recommended to support a consistent and effective assessment approach.	
MNR-25		This area falls within a Sustainable Forest Licence with an approved ten-year Forest Management Plan, where forest resources have been identified for harvest.	The Impact Statement Guidelines should include the anticipated area of land expected to be removed from the productive forest land base of the Wabigoon Forest Management Plan, and the zone of influence that it would require outside of the project footprint, including access road implications.

Insert as many rows as applicable