

# TECHNICAL MEMORANDUM

TO:

**Impact Assessment Agency of Canada  
Ontario Ministry of Environment, Conservation and Parks**

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**FROM**

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**REF**

661910

**DATE**

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**SUBJECT**

Webequie Supply Road Project – Addendum to the Draft Environmental Assessment Report / Impact Statement (EAR/IS)

Responses to Comments on Assessment of Effects on Indigenous Peoples and Supplemental information for the Assessment of Impacts on Indigenous Rights

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The attached Report is Addendum #1 to the Final Environmental Assessment Report / Impact Statement (EAR/IS) for the Webequie Supply Road Project (the Project, WSR). The purpose of the Addendum is to provide supplemental information and responses to comments received from the review of the Draft EAR/IS. The Addendum includes:

- Addendum 1: Indigenous Peoples and Assessment of Impacts on Indigenous Rights
- Appendix A: Supplemental Responses to Comments on Assessment of Effects on Indigenous Peoples
- Appendix B: Supplemental Information on Current and Historical Use of Lands and Resources for Traditional Purposes and Cultural Continuity

**Webequie Supply Road  
Environmental Assessment  
Report / Impact Statement**

March 26, 2026

AtkinsRéalis Ref: 661910

# **ADDENDUM 1: Indigenous Peoples and Assessment of Impacts on Indigenous Rights**

AtkinsRéalis



**WSR**  
WEBEQUIE  
SUPPLY ROAD



# Executive Summary

This Technical Memorandum serves as an addendum to the Final Webequie Supply Road (WSR) Project (“the Project”) Environmental Assessment Report/Impact Statement (EAR/IS) and is focused on addressing these objectives:

- to support the Crown’s assessment of potential impacts on established or asserted Aboriginal and Treaty Rights under Section 35 of the Constitution Act, 1982;
- to respond to Indigenous and regulatory reviewer comments on the Draft EAR/IS; and
- to complete the EAR/IS effects assessment (Section 19) and cumulative effects assessment (Section 21) on Current and Historical Use of Lands and Resources for Traditional Purposes and Cultural Continuity.

The Addendum applies the Impact Assessment Agency of Canada (the Agency) 7-Step Framework to assess potential impacts on Indigenous rights and advances the impact analysis of the Project and cumulative effects on Indigenous Peoples set out in Sections 19 and 21 of the EAR/IS in accordance with the Agency’s guidance, the approved provincial Terms of Reference (ToR) and Tailored Impact Statement Guidelines (TISG) for the Project. The impact assessment was guided by the *United Nations Declaration on the Rights of Indigenous Peoples Act* (UNDA), Canada’s implementation of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and its Action Plan. It also includes Webequie First Nation’s Three-Tier Model and Comprehensive Community Plan (CCP). This legislative context underscores the need for collaborative, rights-based assessment and decision-making. Webequie First Nation’s Three-Tier Model, created by its ancestors to guide land stewardship, cultural continuity, and responsible development, aligns with UNDRIP principles, and provides an Indigenous framework for decision-making, traditional relationships with lands and resources and amongst Indigenous neighbouring communities.

This addendum also addresses comments from Indigenous communities and provincial/federal reviewers on the Draft EAR/IS associated with the Aboriginal and Treaty Rights assessment (see Appendix A of this Addendum for a full listing of comments).

In addition, this addendum completes the effects assessment on Current and Historical Use of Lands and Resources for Traditional Purposes and Cultural Continuity in Appendix B of this Addendum.

The Addendum maps the WSR rights assessment to the Agency’s steps, as follows:

1. Identify and understand rights;
2. Understand context (environmental, social, cumulative);
3. Identify guiding Indigenous values and topics;
4. Identify pathways of impact;
5. Assess severity of impacts;
6. Dialogue on mitigation and accommodation; and
7. Validate findings with communities.

Efforts to advance Steps 5 to 7 have been initiated through consultation opportunities associated with the early release of the draft report and the subsequent public release. Additional mitigation measures and accommodations, including those that may involve Crown actions, may be identified through the continued consultation.

As part of the Project’s engagement and consultation process all 22 Indigenous communities with potential interests in the Project were formally invited beginning in December 2021 to participate in the Indigenous Knowledge program for the Project, which included funding for independent studies to assess impacts on rights and Indigenous values. Communities were provided with multiple opportunities to share their knowledge, perspectives, and priorities through dialogue, meetings, and technical information exchanges.



Each community was also encouraged to submit any relevant information, documentation, or community-prepared reports that describe how the Project may affect the exercise of their Aboriginal and Treaty Rights, cultural practices, land use, and community well-being. This approach was designed so Indigenous perspectives, grounded in lived experience, community history, and Indigenous Knowledge systems were meaningfully considered in the assessment of Project impacts.

The assessment examines how Project activities may affect conditions enabling the exercise of Aboriginal and Treaty Rights. The assessment draws on multiple information sources, including Indigenous Knowledge and Land Use (IKLRU) studies from Webequie First Nation, Fort Albany First Nation, Kashechewan First Nation, Marten Falls First Nation, and Weenusk First Nation. The assessment also included community-specific engagement input obtained throughout the course of the EA/IA process, including meetings, forums, and formal comment submissions; socio-economic existing conditions data supported by Gender-Based Analysis Plus (GBA+) analysis; and desktop research for communities that have not yet provided studies. The Agency's guidance recognizes that long-standing land use itself demonstrates rights, even where territorial assertions vary or remain uncertain. Potential adverse impacts may occur where Project activities interact with Indigenous Rights-supporting values, with effects differing by community-based on proximity and effect pathways.

For the EAR/IS, rights-related information is organized into four interconnected rights-supporting values: current and historical use of lands and resources for traditional purposes, cultural continuity, socio-economic, health, and well-being, and self-determination and self-governance. Baseline conditions across these categories show that harvesting activities such as fishing, hunting, trapping, and plant gathering remain central to the exercise of Aboriginal and Treaty Rights, though increasingly influenced by climate change, access constraints, and economic pressures; these activities depend on key species including moose, caribou, waterfowl, fish, berries, and medicines. Cultural continuity is highly sensitive, with sacred places, language transmission, and intergenerational teaching tied to specific land-based locations. Socio-economic, health, and well-being conditions reflect food security challenges, mental health impacts linked to colonial legacies, and reduced time on the land due to growing reliance on the wage economy. Self-determination and self-governance considerations emphasize community authority and stewardship rights, guided in part by Webequie First Nation's Three-Tier Model. Due to limited community-specific detail provided by some communities, portions of the assessment rely on broader regional knowledge without implying any absence of rights. Environmental, social, economic, and health effects from the Project may therefore lead to impacts on Aboriginal and Treaty Rights across all four themes.

The Project is expected to have both positive and negative effects on Indigenous Peoples. It will likely make it more difficult to access and harvest traditional foods and materials in some areas, mainly affecting Webequie First Nation and, to a lesser extent, other Local Study Area communities. Harvesting opportunities may decline in quantity and quality, and some familiar sites may become harder to reach. These effects are expected to be moderate, mostly negative, and in some cases long-lasting. Caribou are of particular concern. Road construction and associated linear clearings can facilitate predator movement, particularly for wolves, by creating more efficient travel corridors and increasing predator access into previously less-disturbed areas. This can elevate predation rates on caribou and contribute to increased mortality. In addition, research has shown that in many cases boreal caribou have been shown to avoid roads and other linear disturbances at distances ranging from hundreds of metres to five kilometres, resulting in a measurable loss of high-use habitat and altered access to preferred habitat (Fullman et. Al., 2025). Together, these effects may lead to a decline in the availability and quality of caribou for harvesting. These changes are likely to be long-lasting, and may persist for decades in the absence of effective mitigation and habitat restoration.

Cultural practices tied to specific places may also be affected where the road passes near sacred or cultural sites identified primarily by Webequie First Nation. Noise, dust, visual changes, and increased access by non-locals could alter the experience of these places and weaken language use and knowledge sharing between Elders and youth. While road access may make some sites easier to reach, the overall effect is expected to be moderately negative, with permanent losses where sites are altered.



The Project will also bring socio-economic benefits, including jobs, training, and income during construction and, to a lesser extent, operations. These benefits are expected to be moderate, positive, and reversible, while skills gained through training can provide longer-term advantages that last and can transfer to other projects. Increased spending may support local businesses, raise local revenues, and help diversify community economies, particularly during peak construction periods.

Education and training opportunities are expected to grow, including on-the-job learning. Addressing barriers such as childcare and transportation could increase participation by women and youth, and integrating land-based learning and language could help sustain cultural knowledge. These effects are expected to be moderate and positive.

Community cohesion and safety will require careful management. A largely non-local workforce could strain community relationships, reduce participation in cultural activities, and affect perceptions of safety. Risks related to mental health, substance use, and gender-based or family violence may increase, particularly in Webequie First Nation, but these effects are expected to be reversible with strong prevention and support measures.

Traffic safety is a significant concern for Webequie First Nation, as increased vehicle and truck traffic raises the risk of collisions and related incidents. While risks can be managed, serious accidents are irreversible, making prevention essential. Increased traffic, dust, noise, and vibration could also affect land users and cultural sites, though these impacts are expected to be moderate, negative, and reversible with effective mitigation measures.

The assessment also considered cumulative effects, meaning how the Project's impacts combine with past, present, and reasonably foreseeable developments such as Ring of Fire mining proposals (e.g., Black Thor and Eagle's Nest), the Northern Road Link, the Marten Falls Community Access Road, forestry activities, and climate change. Together, these pressures can further affect harvesting areas, cultural sites, travel routes, species such as caribou, and community well-being. Many First Nations have emphasized that without coordinated planning and shared stewardship, ongoing regional industrialization could increasingly limit their ability to exercise Indigenous rights over the long-term.

For woodland caribou, habitat loss and fragmentation, disturbance, reduced connectivity, and increased predation along linear corridors result in an adverse cumulative effect of moderate to high magnitude, lasting from the medium to long-term. For other harvested resources and harvesting areas, cumulative effects are not expected to be significant after mitigation, with caribou as the key exception.

Cumulative effects on cultural continuity are anticipated to be adverse and moderate at a regional scale, extending over the medium to long-term, occurring continuously, and partially irreversible where culturally important sites are permanently lost. Increased access, along with dust and noise near culturally significant locations, may erode language use and intergenerational knowledge transmission, although the road could also enhance access to some sites for Elders and youth. The cumulative effects assessment also recognizes that climate-driven warming is reducing the reliability of winter roads. Traffic during operations on the WSR is expected to include a substantial proportion of heavy vehicles, underscoring the need for stringent safety measures and access controls.

Socially, the Project's effects add to those from other roads and proposed mining, with climate change amplifying pressures. Communities can expect increased traffic and outside access during overlapping construction and operations, raising collision risks and straining community cohesion, particularly for youth and Elders. While some economic and population benefits are anticipated, traffic and safety risks are expected to persist and be only partly reversible, and losses in social cohesion may remain even with mitigation.

The EAR/IS recommends practical measures to reduce harm and enhance benefits, including route refinements and site avoidance, cultural heritage protocols with Indigenous-led monitors, access controls to prevent trespass, dust and noise management, traffic safety planning, and investments in language programs and land-based learning. These actions are coordinated through a Community Readiness Plan (CRP) with community-led monitoring so measures can adapt as conditions change.



The CRP translates commitments into action through a Community Readiness Working Group chaired by Webequie First Nation, supported by thematic sub-groups and Community Liaison Officers who share information, address concerns, and help resolve issues between workers and residents. It includes dry, rules-based construction camps and a code of conduct, a Safety and Security Strategy focused on women, youth, and 2SLGBTQQA+ members and aligned with the Missing and Murdered Indigenous Women and Girls (MMIWG) Calls for Justice, a Road Safety and Traffic Management Strategy, and a Community Emergency Response Strategy with defined roles, communications, and training.

Social supports include proposed expanded childcare and youth spaces, health services, staff housing, and an Elders' complex in Webequie First Nation to enable participation in training and employment while supporting caregivers and knowledge-holders. An Education, Training and Employment Readiness Strategy emphasizes local training, youth pathways, flexible work arrangements, and integration of land-based learning and language. A Procurement Enhancement Strategy promotes Indigenous suppliers through targets, joint-venture guidance, capacity building, and transparent reporting.

On the land and environment, Indigenous-led stewardship and monitoring are integrated with construction and operations environmental management plans to minimize and correct impacts. Traffic planning reflects low overall volumes, limited heavy trucks, no ore hauling during operations, and strong enforcement and education. The CRP also includes community well-being monitoring and adaptive management, tracking indicators across health, economy, culture, governance, and land use to guide timely adjustments as conditions evolve.

Webequie First Nation completed a draft rights impact assessment for the Project. Webequie First Nation concluded that the Project is expected to affect several Indigenous rights, including traditional land and resource use, cultural continuity, socio-economic, health and well-being, and self-determination and self-governance. The effects identified by Webequie First Nation to their Aboriginal and Treaty Rights represent potential impacts prior to the implementation of mitigation measures. For rights related to current and historical use of lands and resources for traditional purposes, potential impacts include reduced access to harvesting areas; however, extensive mitigation, such as dust control, wildlife protections, equipment cleaning, and limiting activities to the project footprint, is predicted to avoid net adverse effects as a result of the Project. Cultural continuity faces risks to spiritual sites, cultural practices, language preservation, and knowledge transmission, and although mitigation includes language revitalization funding, cultural-program support, and protection of sacred areas, a residual adverse impact remains during operation. Socio-economic, health and well-being related rights may be affected through changes to food security, community cohesion, safety, and access to culturally appropriate care; despite measures like water-quality monitoring, strengthened community security, housing and treatment-centre funding, and economic-development opportunities, a net adverse effect is still expected during operations. Rights to self-determination and governance may experience pressures on decision-making authority and territorial control, but measures such as regional planning processes, community involvement in design, transparent communication, route and aggregate-source consultation, and family-level engagement are anticipated to prevent net adverse impacts.

The Addendum characterizes effects on Aboriginal and Treaty Rights using a low–moderate–high framework based on likelihood, extent, duration, reversibility, and implications for culture, health, equity, and cumulative context. For this Project, low to moderate effects are primarily identified for Webequie First Nation, regarding rights associated with current and historical use of lands and resources, cultural continuity, and socio-economic, health and well-being and self-determination and self-governance reflecting a high likelihood of effects, long-term road permanence, and uneven impacts on vulnerable groups. Other Local Study Area (LSA) and Regional Study Area (RSA) communities experience low to moderate effects due to distance and fewer effect pathways.

Net cumulative effects consider interactions with past, existing, and reasonably foreseeable developments (e.g., Ring of Fire mining proposals, other road projects, forestry, and climate change). Net cumulative effects on Aboriginal and Treaty Rights for Webequie First Nation are predicted to be adverse, moderate, medium in extent, and long-term (Stantec Inc., 2025). For other LSA and RSA communities, cumulative effects on Aboriginal and Treaty Rights are anticipated to be low to moderate, affecting traditional land and resource use, cultural continuity, socio-economic conditions, health, well-being, and self-governance based on provided information.



# List of Acronyms and Abbreviations

Term	Definition
2SLGBTQQIA+	Two-Spirit, Lesbian, Gay, Bisexual, Transgender, Queer or Questioning, Intersex, and Asexual
ADHD	Attention deficit hyperactivity disorder
ATRI	Aboriginal Treaty Rights Information
CBLUP	Community Based Land Use Plan
CCP	Comprehensive Community Plan
CEMP	Construction Environmental Management Plans
CHL	Cultural Heritage Landscape
CLO	Community Liaison Officer
CRP	Community Readiness Plan
CRWG	Community Readiness Working Group
EA	Environmental Assessment
EAR	Environmental Assessment Report
ENDM	Energy, Northern Development and Mines
FPIC	Free, Prior and Informed Consent
GBA+	Gender-Based Analysis Plus
HHRA	Human Health Risk Assessment
IA	Impact Assessment
IAA	<i>Impact Assessment Act</i>
IAAC	Impact Assessment Agency of Canada
IK	Indigenous Knowledge
IKLRU	Indigenous Knowledge and Land and Resource Use
IS	Impact Statement
LSA	Local Study Area
MECP	Ministry of Environment, Conservation and Parks
MEM	Ministry of Energy and Mines
MFCAR	Marten Falls Community Access Road
MMIWG	Missing and Murdered Indigenous Women and Girls
MNRF	Ministry of Natural Resources and Forestry
MOU	Memorandum of Understanding
NRL	Northern Road Link
OEMP	Operation Environmental Management Plan Framework



Term	Definition
Q&A	Questions and Answers
RFD	Reasonably Foreseeable Developments
RSA	Regional Study Area
TISG	Tailored Impact Statement Guidelines
UNDA	<i>United Nations Declaration on the Rights of Indigenous Peoples Act</i>
UNDRIP	United Nations Declaration on the Rights of Indigenous People
TISG	Tailored Impact Statement Guidelines
ToR	Terms of Reference
VC	Valued Component
WSR	Webequie Supply Road



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- B: Supplemental Information on Current and Historical Use of Lands and Resources for Traditional Purposes and Cultural Continuity



# 1 Introduction

## 1.1 Purpose of the Addendum

This Technical Memorandum serves as an addendum to the Webequie Supply Road (WSR) Project (“the Project”) Environmental Assessment Report/Impact Statement (EAR/IS) to strengthen the Crown’s assessment of potential impacts on established or asserted Aboriginal and Treaty Rights under Section 35 of the *Constitution Act*, 1982 and to respond to Indigenous and regulatory reviewer comments on the Draft EAR/IS. It applies the Impact Assessment Agency of Canada (“the Agency”) 7-step framework to advance the rights assessment to a consideration of severity of impacts (Step 5), with validation and dialogue with Indigenous communities to follow by the Crown.

This Addendum has been prepared to provide additional context, clarification, and supporting information regarding the assessment of potential effects on Indigenous Peoples associated with both Project-specific activities and cumulative effects. It aims to strengthen the understanding of how Project components may interact with existing environmental, social, and cultural conditions, and how these interactions may influence the exercise of Aboriginal and Treaty Rights of Indigenous communities.

The Addendum describes the assessment method, the information sources considered, and the outcomes of the assessment. It also highlights areas where the engagement and consultation process, Indigenous Knowledge, or technical analysis has informed the evaluation. By presenting this supplementary information, the Addendum seeks to reflect Indigenous perspectives, align with applicable regulatory requirements, and supports transparent, meaningful consideration of potential effects on constitutionally protected Aboriginal and Treaty Rights as per the current information available to the proponent and Webequie Project Team.

The content of the Addendum reflects data, clarifications, and input received up to the submission of the Final EAR/IS by Indigenous communities and the Government Review Team, as well as information provided throughout Indigenous engagement and consultation, technical studies, and ongoing regulatory correspondence throughout the course of the preparation of the EAR/IS.

As part of the scope of the Addendum, this document is intended to fulfill a commitment to respond and resolve the comments received from provincial departments and Indigenous communities on the Draft EAR/IS, associated with Aboriginal and Treaty Rights, as presented in Table 1-1 in Appendix A.

## 2 Regulatory Framework for Rights Assessment

### 2.1 Regulatory Approach to Assessment of Impacts to Aboriginal and Treaty Rights

The Agency guidance document on assessment of potential impacts on the rights of Indigenous Peoples (IAAC, 2024) provides an assessment approach that is intended to be flexible and iterative to adapt to the needs of Indigenous communities. The steps outlined in the Agency guidance document (IAAC, 2024) support the assessment of potential impacts to Aboriginal and Treaty Rights, as depicted in **Table 2-1** below.



The federal guidance for the assessment of potential impacts on the exercise of Aboriginal and Treaty Rights includes seven steps. As described in the sections that follow, the Addendum presents information used for determining the severity of impacts, using criteria developed with input from federal and provincial departments and Indigenous communities.

**Table 2-1: Summary of the Agency’s Guidance on Assessment of Potential Impacts on Aboriginal and Treaty Rights**

Steps	General Description	Details
Step 1 - Identify and understand the Aboriginal and Treaty Rights of Indigenous communities	<p>Identify and work together to understand the nature and context of the rights of the Indigenous community. Indigenous Peoples are best placed to identify a project’s impacts on their rights.</p> <p>As noted in the Agency’s guidance, “Indigenous communities may not use the term “rights” to refer to the practices, customs, beliefs, or worldview that underpin important ways of life. Nevertheless, their long-standing connection to, use of, or occupation of an area is indicative of their rights” (IAAC, 2021).</p>	<p>As indicated by the Agency’s Policy Context: Assessment of Potential Impacts on the Rights of Indigenous Peoples (IAAC, 2020b), “the assessment should be based on the rights as articulated by the rights-holding Indigenous group”. Hence, developing a respectful relationship and a collaborative approach to meaningfully engage communities on the exercise of rights is the objective in early planning.</p> <p>Secondary information was collected as part of desktop analysis, followed by discussions on building understandings of the exercise of rights, including through consultation and engagement activities and the Indigenous Knowledge and Land Use Program.</p>
Steps 2 - Understand the context in which impacts on Aboriginal and Treaty Rights would occur	<p>Identify the environmental, health, social and economic conditions that support the community’s meaningful exercise of their rights.</p> <p>Understand how historic, existing, and reasonably foreseeable future activities have cumulatively affected or could affect the conditions that support or limit the Indigenous community’s meaningful exercise of their rights.</p> <p>Identify the importance of specific areas or locations that are important to the community and may be impacted by the Project.</p>	<p>Contextual factors may have historically affected or currently affect the exercise of Aboriginal and Treaty Rights. Developing an accurate understanding of current and historical environmental, health, social and economic baseline conditions supports an understanding of how the Project may impact Aboriginal and Treaty Rights.</p> <p>Indigenous Knowledge provides crucial contextual information from Indigenous communities through community-led studies.</p> <p>The Indigenous Knowledge and Land Use Program and engagement and consultation activities sought to support meaningful engagement and develop an accurate understanding of community perspectives on baseline conditions for the assessment of impacts on Aboriginal and Treaty Rights.</p>
Step 3 - Identify guiding values and topics (what to assess)	<p>Similar to “valued components” with respect to biophysical assessments (referred to here as Indigenous Peoples’ values), as a set of priority values and topics associated with community well-being, cultural expression, and the preferred means of exercising Aboriginal and Treaty Rights.</p>	<p>Values and topics of importance identified by Indigenous communities support refinement of the indicators for the assessment of impacts on Aboriginal and Treaty Rights.</p> <p>The Indigenous Knowledge and Land Use Program builds an understanding of Aboriginal and Treaty Rights, including a focus on values and topics of importance to Indigenous communities.</p>
Step 4 - Identify pathways of impact from the Project	<p>Identify pathways from Project-related activities to the biophysical environment that supports the exercise of rights.</p> <p>Identify other relationships between the Project and the conditions needed to exercise rights, such as access, quality, and quantity of resources, or the quality of</p>	<p>Building on an understanding of Aboriginal and Treaty Rights, pathways of impact are described by which the Project may affect the exercise of Aboriginal and Treaty Rights by the Indigenous community.</p> <p>Community-led IKLRU studies undertaken by Indigenous communities can include information</p>



Steps	General Description	Details
	experience of exercising the rights. Impacts to the exercise of a right in preferred locations, at preferred times, and by preferred means should be assessed.	on pathways of impacts and other input related to conditions Aboriginal and Treaty Rights.
Step 5 - Assess level of impact	The objective is to assess the level of severity of the impacts that the Project may have on the exercise of Aboriginal and Treaty Rights. Establish clear criteria with input from the rights-holding Indigenous community on what constitutes a low, moderate, or high level of impact.	Criteria to evaluate the severity of adverse impacts on Aboriginal and Treaty Rights are provided in <b>Section 5.1</b> . Consultation and engagement activities, as well as the Indigenous Knowledge and Land Use Program provide input on assessment of level of impacts on the exercise of Aboriginal and Treaty Rights. Measures proposed to avoid, mitigate or compensate for the impacts identified are taken into consideration for the assessment of the severity of impacts.
Step 6 - Dialogue on measures to address impacts	For impacts that are likely to occur, ensure that an iterative two-way dialogue takes place on measures proposed to address the impact.	Indigenous communities, the Agency, other federal authorities and the provincial government work together to find mutually agreeable solutions to concerns raised about the Project by Indigenous communities.
Step 7 - Validate and follow-up on assessment outcomes	As the impact assessment process unfolds, the steps can be revisited, and analysis can be revised based on new information and continued dialogue between all parties.	Prior to finalizing conclusions, the Agency, other federal authorities and the provincial government should have the opportunity to comment on the content of the assessment.

## 2.2 Canada’s United Nations Declaration on the Rights of Indigenous Peoples Act (UNDA) and the UNDA Action Plan

The United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) is an international human rights declaration that outlines the rights of Indigenous Peoples worldwide (United Nations, 2007). In June 2021, Canada advanced its commitment to UNDRIP by passing the *United Nations Declaration on the Rights of Indigenous Peoples Act* (UNDA). The Act sets out a process for the federal government and Indigenous Peoples to work together on implementing the Declaration, and requires federal laws, policies, and practices to be reviewed and aligned with it (Government of Canada, 2025). In the Government of Canada’s press release, it states: “Today represents a critical step in recognizing, promoting, protecting and upholding the human rights of Indigenous Peoples in Canada. It marks another important move forward in the evolving history of the Crown Indigenous relationship, one that will help forge stronger relationships and support the path to self-determination for First Nations, Inuit and Métis while taking action to advance reconciliation, together” (Government of Canada, 2025).

## 2.3 Webequie First Nation Three-Tier Model

Webequie First Nation’s ancestors (Webequie Inninuwuk) created the Three-Tier Model; Kanisso Pittawa Attayk Onakoonikun (Webequie First Nation, 2023). Webequie’s Elders saw the changes that were coming once the community was settled in one location and that this would affect their way of life. The Three-Tier Model provides the framework to guide its decision- making and to define its relationship with its territories and with surrounding neighbours (Webequie First Nation, 2023).



*“Our Elders know it is important maintain to our relationships with the land that was provided to us by the Creator with inherent responsibility, so they drew a conceptual design of the model of Kanisso Pittawa Attayk Onakoonikun, or the “3- Tier Model”, to preserve or way of life that is sustainable and to be inclusive because of the ever changing economic landscape. This is a great Principle of our Anishinnuwug” (Webequie First Nation, 2023).*

The Three-Tier Model provides continuity of Webequie’s traditional way of life and ancestral relationship with the land, while allowing for responsible, sustainable and equitable resource development (Webequie First Nation, 2023). The Three-Tier Model is understood to be consistent with UNDRIP in many aspects, include to maintain and strengthen distinctive spiritual relationship with traditionally owned or otherwise occupied and used lands, territories, waters and other resources to uphold responsibilities to future generations, as well as self-determination to pursue economic, social and cultural development, and the minimum standards for the survival, dignity and well-being of Indigenous Peoples.

The three land areas in which Webequie First Nation applies the Three-Tier Model (Webequie First Nation, 2023) are presented below.

- Tier 1: Tawin (Community Land Base) – Located on the northern peninsula of Eastwood Island on the Winisk Lake, it is the home for Webequie First Nation’s people and the heart of its community.
- Tier 2: Tashiikawiin/Tashiwiitoo (Protected Traditional Area) – The Protected Traditional Area is within a one-day walking distance (roughly a 40-50 km radius) in any direction from the community.
- Tier 3: Bimachiiowiin Akkii (Area of Mutual Benefit) – Within another one-day walking distance is the Area of Mutual Benefit. This is where Webequie people, neighbouring communities, and outside parties can realize benefits from customary use, stewardship, and development activities (Webequie First Nation, 2023).

The Three-Tier Model underpins the Webequie First Nation’s 2023 Comprehensive Community Plan (CCP), which sets the community’s long-term vision. The CCP acts as a “measuring stick” for ensuring development aligns with cultural continuity, sustainable resource use, and equitable benefits.

The CCP identifies seven goals used to guide rights assessment and community planning:

- Community health and social well-being;
- Education and training;
- Housing and infrastructure;
- Economic development;
- Environmental quality and land relationship;
- Cultural vibrancy and traditional life; and
- Community leadership and governance.

The Three-Tier Model provides the foundation for Webequie’s approach to community development, governance and cultural resilience. The seven directions that are informed by the Three-Tier Model offer a set of priority values that are aligned with the preferred means of expression of the exercise of Aboriginal and Treaty Rights by Webequie.

The identification of Aboriginal and Treaty Rights and rights-supporting values, described below, takes into account the Three-Tier Model and the Webequie First Nation CCP’s seven planning directions to guide future development, created by Webequie First Nation.



### 3 Consideration of EAR/IS Indigenous Community and Government Agency Comments

The addendum addresses a wide range of comments raised by Indigenous communities, regulators, and stakeholders regarding the EAR/IS, with a particular focus on strengthening the assessment of effects on Indigenous Peoples and the exercise of Aboriginal and Treaty Rights. Key items covered include additional analysis of pathways affecting rights-based activities such as harvesting, land use, cultural practices (Section 6), and spiritual areas updates to the cumulative effects assessment (Section 7).

For a complete account of comments received from Indigenous communities and government agencies on the EAR/IS related to the assessment of effects of the Project on Indigenous Peoples and impacts to Aboriginal and Treaty Rights, as well as detailed responses and how they are addressed within this addendum, please refer to Appendix A.

### 4 Indigenous Communities, Rights and Baseline Context

#### 4.1 Indigenous Communities Considered

The Crown (MECP and the Agency) provided lists of First Nations and Métis communities whose exercise of Aboriginal and Treaty Rights may be adversely affected by the Project and/or that may have interest in the Project. The federal Crown’s list of Indigenous communities and groups to be consulted for the Project is in the Agency *Indigenous Engagement and Partnership Plan* provided to the proponent on February 24, 2020. The Ontario Crown’s list of Indigenous communities to be consulted for the Project was provided in a letter from MECP dated December 19, 2018, and confirmed in the MOU of February 7, 2020, between MECP, ENDM (now MEM) and Webequie First Nation. The collective list of the twenty-two (22) Indigenous communities that have been consulted and engaged as part of the EA/IA process for the Project are listed in **Table 4-1**. Communities marked with an asterisk are those whose Aboriginal and Treaty Rights may be affected by the Project, according to the Crown agencies.

**Table 4-1: Indigenous Communities with Potential to be Affected and/or with an Interest in the Project as Identified by Provincial and Federal Crown Agencies**

Indigenous Community	Identified by MECP	Identified by the Agency
Webequie First Nation	✓*	✓ *
Aroland First Nation	✓*	✓*
Attawapiskat First Nation	✓*	✓*
Constance Lake First Nation	✓*	✓
Eabametoong First Nation	✓	✓
Fort Albany First Nation	✓*	✓*



Indigenous Community	Identified by MECP	Identified by the Agency
Ginoogaming First Nation	✓	✓
Kasabonika Lake First Nation	✓*	✓*
Kashechewan First Nation	✓*	✓*
Kitchenuhmaykoosib Inninuwug First Nation	✓*	✓
Kingfisher Lake First Nation	✓*	✓
Long Lake #58 First Nation	✓	✓
Marten Falls First Nation	✓*	✓*
Métis Nation of Ontario – Region 2	✓	
Mishkeegogamang First Nation	✓	
Neskantaga First Nation	✓*	✓*
Nibinamik First Nation	✓*	✓*
North Caribou Lake First Nation	✓	
Wapekeka First Nation	✓*	
Wawakapewin First Nation	✓*	
Weenusk (Peawanuck) First Nation	✓*	✓*
Wunnumin Lake First Nation	✓*	

**Note:** Indigenous communities or organizations/groups whose rights may be affected by the Project, according to MECP and the Agency, are marked with an asterisk.

## 4.2 Categories of Aboriginal and Treaty Rights Considered for Assessment

The assessment of Aboriginal and Treaty Rights for the Project is based primarily on information shared by Indigenous communities through the IKLRU Program, consultation and engagement efforts throughout the assessment process, and publicly available sources. While many communities have not participated in the IKLRU Program, several have contributed values and concerns during the EA/IA process, and this input has informed the assessment. Additional project-specific IKLRU information provided by Webequie First Nation, Fort Albany First Nation, Kashechewan First Nation, Marten Falls First Nation, and Weenusk First Nation is included in the assessment.

This assessment examines how Project-related activities could affect environmental, social, economic, and health conditions that support the meaningful exercise of Aboriginal and Treaty Rights such as access to land, resource quality and availability, and overall community well-being.

The Agency notes that a community's long-standing use and connection to an area is evidence of its rights, but these territorial assertions may be uncertain, misunderstood, or vary across parties.

Potential adverse effects on rights may occur where Project construction or operation interacts with resources essential to exercising those rights, even when specific sites or activities are not fully documented by communities. The Project Team recognizes that each Indigenous community has unique values and interests,

and that the degree of impact will vary based on proximity and exposure pathways. Ongoing engagement will continue, and any further Indigenous input received after this report will be reviewed.

For the purposes of the EAR/IS, information on Aboriginal and Treaty Rights is organized into four rights:

- Current and historical use of lands and resources for traditional purposes: which identifies effects on Indigenous Peoples' ability to access, use, and rely on traditional lands and resources for activities such as hunting, fishing, gathering, and cultural practices;
- Cultural continuity: which identifies effects on the preservation and transmission of cultural identity, language, customs, and traditional knowledge across generations;
- Socio-economic, health, and well-being: which identifies effects on community living conditions, economic opportunities, health outcomes, and overall quality of life; and
- Self-determination and self-governance: which identifies effects on Indigenous communities' capacity to make autonomous decisions, manage their affairs, and exercise governance over their lands, resources, and societal systems.

These categories reflect a holistic, interconnected understanding of rights. As detailed community-specific information was not provided by many Indigenous communities, it is limited and some conclusions are inferred from general knowledge and desktop research, but this does not imply the absence of rights. The Project may generate environmental, social, economic, and health effects that could, in turn, lead to adverse impacts on Aboriginal and Treaty Rights.

Additional information on the regulatory and policy setting are outlined in Section 19.1 of the Final EAR/IS.

## 4.3 Baseline Conditions Supporting the Exercise of Aboriginal and Treaty Rights

Detailed information on baseline conditions of Indigenous Peoples was provided in the Final EAR/IS Section 19.2.2 (Results).

This section provides a summary of the baseline conditions related to the exercise of Aboriginal and Treaty Rights that was provided by Indigenous communities identified in **Section 4.1**. To-date, Webequie First Nation is the only Indigenous community to submit a rights impact assessment for the Project.

It establishes the baseline context for understanding how the Webequie community currently uses the land, waters, and resources, forming the foundation for assessing potential Project impacts on rights, based on its own perspectives generated through engagement with community members.

The following information on Webequie First Nation is based on "Webequie First Nation Indigenous and Treaty Rights Impact Assessment for the Webequie Supply Road" (Stantec Inc., 2025).



## 4.3.1 Current and Historical Use of Lands and Resources for Traditional Purposes

### Rights to Traditional Harvesting

Webequie First Nation continues its exercise its harvesting rights through traditional land and resource use, which includes activities, practices and places, locations, areas related to use of traditional resources; practices including ceremony, hunting, trapping, and fishing; travel for harvesting practices; and use of habitation areas during harvesting. Harvesting remains central to food sovereignty, with community members hunting, trapping, fishing, and gathering a range of traditional foods that support both dietary needs and connections to the land. These foods are seasonal and influenced by migration patterns, climate change, and other environmental factors. Access to culturally important species is fundamental to the exercise of Webequie First Nation's harvesting rights.

Today, members harvest moose, caribou, partridge, ducks, geese, and other wildlife. Trapping has declined since the reduction of the commercial fur trade, but people still consume species such as beaver, muskrat, otter, mink, fox, lynx, and wolf. Fishing remains the most widely practiced activity and provides the largest share of regularly consumed traditional foods. Wildlife parts, including bones, hides, and sinew continue to be used for tools, clothing, jewellery, and other traditional items. Plants remain important for subsistence, medicinal, and practical uses. Community members harvest berries throughout their traditional territory, often in rocky areas. Traditional medicines such as cedar are shared widely, both with nearby Indigenous communities and with members living in urban centres like Thunder Bay. Protecting the availability and quality of these plants is an essential aspect of harvesting rights. These practices continue to be guided by traditional teachings and Indigenous Knowledge.

Impacts from climate change has created concerns among the community members, with changes in freeze and thaw cycles, ice buildup, and precipitation cycles shifting the harvesting patterns. Community members also highlighted that anthropogenic influences such as pollution from mines, and presence of helicopters and other machinery creates chain adverse reactions in terms of availability, quality and quantity as well as growth/ expansion of harvest species and populations.

### Rights to Access Traditional Lands and Waters

In the late 1970s and early 1980s, the commercial fishing boom enabled many families to purchase snowmobiles, motorized boats, trucks, and other vehicles, with affordable fuel making land-based travel much easier. Since then, rising fuel costs and inflation have created significant financial barriers to accessing harvesting areas. While a few families can charter floatplanes or helicopters, many community members now fish closer to the reserve because they cannot regularly afford the fuel required to travel farther.

Currently Webequie First Nation's existing traditional land and resource use is limited to an area smaller than in the past. In the past, traditional lands extended to hundreds of kilometres of footpaths, days of travel using canoes and dogsleds, celestial navigation and weather prediction, and travelling on all terrains. Current limitations are mainly to do with financial and maintenance constraints, with regard to purchasing equipment and vehicles, along with cost of gas and materials for maintenance. Additionally, climate change has also created additional restrictions such as lowered water levels which limit travel to traditional lands by waterways, change in ice roads conditions and durations, and changes to travelling conditions and patterns due to changes in weather. These limitations have resulted in increasingly reduced time and effort spent for traditional activities which infringe on Webequie First Nation's exercise of rights.



## 4.3.2 Cultural Continuity

### Rights to cultural and experiential practices

Permanent settlement and the establishment of church-run day schools and residential schools, along with other external influences, disrupted intergenerational knowledge transfer and limited the ability of women and children to participate in cultural and experiential practices. Although not all children attended these residential schools, the community as a whole was affected. These impacts continue today through intergenerational trauma, substance abuse, suicide, and breaks in knowledge transmission from Elders to youth. Technology has also introduced new challenges by distracting youth from cultural learning and exposing community members to content that conflicts with traditional values and belief systems.

Webequie First Nation has expressed concern about the loss of its language and way of life as colonial systems have pushed members to live in ways that conflict with traditional values. Community informants noted that responsibilities were once clearly understood and passed down through generations, but today many young people primarily speak English and have limited knowledge of their traditional language. Because language, traditions, and cultural practices are closely connected to cultural and experiential rights, the lack of opportunities to learn the language while engaging in land-based activities such as hunting, fishing, and trapping, puts the Nation at risk of losing place-based vocabulary and the deeper meanings embedded in its dialect.

Webequie First Nation noted that community members once commonly made snowshoes and tanned moose hides, but fewer traditional tools and clothing items are now produced from harvested materials, even though activities such as hunting and fishing continue. Many members are actively reclaiming their culture and reconnecting with traditional practices, and community informants reported that some teachings and cultural protocols are still being passed to youth. These practices remain central to intergenerational learning and cultural transmission. Informants also emphasized the continued importance of sharing and reciprocity, as many of the crafts that are created are shared or gifted within the community, supporting cultural cohesion.

Webequie First Nation emphasized that rivers and other waterbodies hold deep spiritual significance, creating a responsibility to protect these areas, such as Winisk Lake and the tertiary watershed which connect to Hudson Bay. The community also hosts feasts, gatherings, and powwows as part of its cultural practices, and Winisk Lake is a ceremonial area. Several sacred and sensitive sites were identified through the study which included Fly Island and burial sites for sled dogs, and their protection is essential to maintaining the community's cultural and experiential rights.

## 4.3.3 Socio-Economic Health and Well-Being

### Rights to Socio-economic and Well-being

The ability for community members to sustain themselves from the land and support individual and collective well-being is a key aspect of socio-economic and well-being rights. Since the introduction of unhealthy, store-bought foods, overall physical health in the community has declined. Webequie First Nation members must travel by air to regional centres such as Sioux Lookout or Thunder Bay for routine medical services or emergency care, which has contributed to reduced confidence in available healthcare supports. Webequie First Nation notes that the long-term impacts of colonial systems continue to affect the community, resulting in inadequate housing, food insecurity, limited access to clean drinking water, and the enduring effects of residential schools. Traditional medicines and healing practices remain important, but barriers to intergenerational knowledge transfer mean many younger community members are not familiar with how to identify or use traditional medicines.

The lasting trauma of residential schools has significantly influenced mental health and addiction issues in the community. Many members are experiencing crisis-level conditions, with anxiety identified as a major concern passed through generations. Mental health is as essential as physical health to socio-economic and well-being rights, including the right to access culturally appropriate care and traditional healing. Land-based healing programs are needed to help address these challenges. Substance abuse has affected the community for decades, intensifying in the 1990s as residential school survivors began disclosing their experiences. Increased access to technology in the early 2000s also spread information about using substances to cope with pain and trauma. Today, addiction continues to impact some members' ability to participate in traditional activities, contributing to social trauma and reducing opportunities for time spent on the land.

The right to well-being reflects not only individual health, but the wellness of the entire community. Webequie First Nation continues to experience suicide among members, with widespread impacts despite provincial funding for mental-health services and suicide-prevention initiatives in 2004. Cyberbullying is an increasing concern, as youth spend less time on the land and more time using technology. The community also reports high rates of attention deficit hyperactivity disorder (ADHD) and autism, with limited supports for individuals with learning disabilities. While two-spirited people are generally not assigned distinct roles within the community today, there is growing interest in revisiting traditional teachings for greater comfort, inclusion, and cultural acceptance.

Historically, community members did not rely on income for subsistence, but modern employment demands now limit time on the land and expose youth to influences, especially technology that shift them away from land-based livelihoods. While employment supports socio-economic rights, Webequie First Nation stresses that jobs, training, and contracting must reflect community cultural values. Webequie First Nation is interested in youth employment, locally owned businesses, and revitalizing the commercial fishing industry so the trade can be passed on. Traditional economies such as trapping, guiding, and commercial fishing remain essential to Webequie First Nation's socio-economic and well-being rights. Community members also noted the need for higher education to engage equitably with outside parties involved in developments like the Ring of Fire. Webequie First Nation considers participation in resource-related economic opportunities a fundamental right.

The effects of colonialism have reduced Webequie First Nation's ability to harvest traditional foods, and factors such as alcohol use, reliance on store-bought foods, and economic challenges have further strained important resources. When traditional foods are available, households commonly share them within the community. Rising food prices especially for fresh, healthy items make access to traditional foods even more critical. Food insecurity is particularly acute for single-parent and all-female households that may not have regular access to harvested foods because they "don't have a hunter." While food security is a key socio-economic and well-being right, the cultural importance and health benefits of traditional foods are equally vital.

#### **4.3.4 Self-Determination and Self-Governance**

Webequie First Nation's rights related to customs, protocols, and laws continue to be upheld through the management of land by clans and family groups. Community teachings and values reflected in the Three-Tier Model affirm Webequie First Nation's right to participate in decisions about sustainable land use for future generations. Before Ontario introduced the registered trapline system in the 1970s, harvesting occurred freely, though families and clans understood their traditional areas. While access was not restricted, it was customary to ask permission and provide an offering.

Historically, clans and family groups were connected through marriage and shared traditions, gathering in large groups at key fishing sites to socialize, feast, conduct ceremonies, and arrange marriages. Webequie First Nation emphasizes the importance of the Creator's Earth Law, which teaches respect and harmonious relationships with the Creator, the land and animals, and other people. These traditional customs, protocols, and laws continue to guide Webequie First Nation's decision-making today.



# 5 Assessment Approach and Methodology

## 5.1 Assessment Method

This section summarizes the methodology used to assess potential effects on Indigenous Peoples, drawing on the processes for identifying effects and impacts to Aboriginal and Treaty Rights, conducting engagement and consultation, and incorporating Indigenous Knowledge and other relevant information sources.

### 5.1.1 Identification of Pathways of Effect to Indigenous Peoples and to Aboriginal and Treaty Rights for Assessment

As presented in **Table 5-1** the nature and extent of, and the potential effects of the Project takes into consideration a range of identified Indigenous Peoples' values and Aboriginal and Treaty Rights that inform the assessment, including outcomes from engagement and consultation.

The EAR/IS and this Addendum has integrated information made available to the proponent through the EAR/IS preparation to-date, including a community-led Indigenous rights impact assessment for Webequie First Nation, and submission of Indigenous Knowledge and Land and Resource Use (IKLRU) studies by Indigenous communities, as well as comments from Indigenous communities on the review of EAR/IS documentation and engagement and consultation activities throughout the course of the assessment process.

**Table 5-1: Indigenous Peoples' Values and Aboriginal and Treaty Rights, Indicators and Rationale**

Indigenous Peoples' values and Aboriginal and Treaty Rights	Indicators	Pathways of Effect
Impacts on the Exercise of Aboriginal and Treaty Rights	<ul style="list-style-type: none"> <li>▪ Impacts on rights related to current and historical use of lands and resources for traditional purposes and activities.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Construction activities → Loss and/or alteration of lands and resources for traditional harvesting → Availability, quality and quantity of traditionally harvested resources → Reduced ability to exercise harvesting rights.</li> <li>▪ Construction activities → Loss of and/or alteration of sites and areas used for traditional harvesting → Reduced ability to exercise harvesting rights.</li> <li>▪ Construction activities → Loss of and/or alteration of access to lands and resources used for traditional harvesting → Reduced ability to exercise harvesting rights.</li> <li>▪ Construction activities → In-migration of temporary workers → Increased non-local population → Increased demand for harvested resources → Reduced ability to exercise harvesting rights.</li> <li>▪ Operations and maintenance activities → Loss and/or alteration of lands and resources for traditional harvesting → Availability, quality and quantity of traditionally harvested resources → Reduced ability to exercise harvesting rights.</li> <li>▪ Operations and maintenance activities → Loss of and/or alteration of sites and areas used for traditional harvesting → Reduced ability to exercise harvesting rights.</li> </ul>

Indigenous Peoples' values and Aboriginal and Treaty Rights	Indicators	Pathways of Effect
	<ul style="list-style-type: none"> <li>▪ Impacts on rights related to cultural continuity.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Construction activities → Loss and/or alteration of sites and areas used for cultural and spiritual purposes → Reduced ability to practice spiritual and ceremonial rights → Impacts to the continuation and transmission of rights based cultural knowledge.</li> <li>▪ Construction activities → Loss and/or alteration of access to lands and resources used for cultural and spiritual purposes → Impacts to the continuation and transmission of rights based cultural knowledge.</li> <li>▪ Construction activities → Expenditures and employment → Change to population and demographics → Change to cultural traditions and practices, including use and preservation of Indigenous languages → Impacts to the continuation and transmission of rights based cultural knowledge.</li> <li>▪ Operations and maintenance activities → Loss and/or alteration of sites and areas used for cultural and spiritual purposes → Impacts to the continuation and transmission of rights based cultural knowledge.</li> <li>▪ Operations and maintenance activities → Loss and/or alteration of sites and areas used for cultural and spiritual purposes → Reduced ability to practice spiritual and ceremonial rights → Impacts to the continuation and transmission of rights based cultural knowledge.</li> </ul>
	<ul style="list-style-type: none"> <li>▪ Impacts on rights related to socio-economic, health and well-being conditions.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Construction activities → Environmental disturbance and contamination risk → Changes to availability, quality, or perceived safety of traditional foods → Decreased reliance on land-based nutrition → Impacts to food security and health-related rights.</li> <li>▪ Construction activities → In-migration of temporary workers → Increased non-local population → Impacts to rights on social cohesion, well-being and quality of life.</li> <li>▪ Construction activities → Increased population in the community → Increased demand for local health and wellness services → Reduced availability for community members → Impacts to the right to culturally appropriate and accessible health care.</li> <li>▪ Construction activities → Increased workforce mobility, traffic, and camp activity → Higher risk to vulnerable groups (children, Elders, women, 2SLGBTQIA+ members) → Reduced community safety → Impacts to rights related to social well-being and protection.</li> <li>▪ Construction activities → Increased population from outside of the community → Increased availability or exposure to substances → Heightened substance use risks → Impacts to community health and wellness rights.</li> <li>▪ Operations and maintenance activities → Environmental disturbance and contamination risk → Changes to availability, quality, or perceived safety of traditional foods → Decreased reliance on land-based nutrition → Impacts to food security and health-related rights.</li> </ul>

Indigenous Peoples' values and Aboriginal and Treaty Rights	Indicators	Pathways of Effect
		<ul style="list-style-type: none"> <li>▪ Operations and maintenance activities → In-migration of temporary workers → Increased non-local population → Impacts to rights on social cohesion, well-being and quality of life.</li> <li>▪ Operations and maintenance activities → Increased population in the community → Increased demand for local health and wellness services → Reduced availability for community members → Impacts to the right to culturally appropriate and accessible health care.</li> <li>▪ Operations and maintenance activities → Increased workforce mobility, traffic, and camp activity → Higher risk to vulnerable groups (children, Elders, women, 2SLGBTQIA+ members) → Reduced community safety → Impacts to rights related to social well-being and protection.</li> <li>▪ Operations and maintenance activities → Increased population from outside of the community → Increased availability or exposure to substances → Heightened substance use risks → Impacts to community health and wellness rights.</li> </ul>
	<ul style="list-style-type: none"> <li>▪ Impacts on rights related to self-determination and self-governance.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Construction activities → Reduced ability to influence decisions affecting lands, resources, and community well-being → Impacts to right for self-determination and self-governance.</li> <li>▪ Construction activities → Project footprint conflicting with Indigenous developed land use plans or stewardship priorities → Reduced ability to implement community plans → Impacts to the Nation's strategic decision-making authority and right for self-determination and self-governance.</li> <li>▪ Operations and maintenance activities → Reduced ability to influence decisions affecting lands, resources, and community well-being → Impacts to right for self-determination and self-governance.</li> <li>▪ Operations and maintenance activities → Project footprint conflicting with Indigenous developed land use plans or stewardship priorities → Reduced ability to implement community plans → Impacts to the Nation's strategic decision-making authority and right for self-determination and self-governance.</li> </ul>

## 5.1.2 Study Area Boundaries

### 5.1.2.1 Spatial Boundaries

The spatial boundaries for the assessment of effects on Indigenous Peoples' rights-supporting values include the following delineations:

- **Project Footprint** – the area of direct disturbance (i.e., the physical area required for project construction and operations). The Project Footprint is defined as the 35-metre wide right-of-way (ROW) of the WSR; and temporary or permanent areas needed to support the Project that access roads, construction camps, laydown and storage yards, aggregate pits/quarries, and a maintenance and storage facility.



- **Local Study Area (LSA)** – the area where direct and indirect effects of the Project on Indigenous Peoples and Aboriginal and Treaty Rights are likely to occur. The LSA extends 1 km from the centreline of the preliminary recommended preferred route and 500 m from temporary or permanent support infrastructure. Within the LSA the assessment encompasses the following communities:
  - Webequie First Nation;
  - Attawapiskat First Nation;
  - Eabametoong First Nation;
  - Kasabonika Lake First Nation;
  - Marten Falls First Nation;
  - Neskantaga First Nation;
  - Nibinamik First Nation; and
  - Weenusk First Nation;
  
- **Regional Study Area (RSA)** – The area where potential indirect and cumulative effects of the Project in the broader, regional context may occur. The RSA extends to include area of the quaternary watersheds crossed by the recommended preferred route for the RSA. Within the RSA, the assessment encompasses the following communities:
  - Aroland First Nation;
  - Constance Lake First Nation;
  - Fort Albany First Nation;
  - Ginoogaming First Nation;
  - Kashechewan First Nation;
  - Kitchenuhmaykoosib Inninuwug First Nation;
  - Kingfisher Lake First Nation;
  - Long Lake #58 First Nation;
  - Métis Nation of Ontario Region 2;
  - Mishkeegogamang First Nation;
  - North Caribou Lake First Nation;
  - Wunnumin Lake First Nation.
  - Wapekeka First Nation; and
  - Wawakapewin First Nation.

### 5.1.2.2 Project Timeframe Parameters

Temporal boundaries for the assessment address the potential effects of the Project over relevant timescales. The temporal boundaries for the Project consist of two main phases:

- **Construction Phase:** All activities associated with the initial development and construction of the road and supportive infrastructure from the start of the construction to the start of the operation and maintenance of the Project and is anticipated to be approximately five to six years in duration.
- **Operations Phase:** All activities associated with operation and maintenance of the road and permanent supportive infrastructure (e.g., operation and maintenance yard, aggregate extraction and processing areas) that will start after the construction activities are complete, including site restoration and decommissioning of temporary infrastructure (e.g., access roads, construction camps, etc.). The operations phase of the Project is anticipated to be 75 years based on the expected timeline when major refurbishment of road components (e.g., bridges) is deemed necessary.



The Project is proposed to be operated for an indeterminate period; therefore, future suspension, decommissioning and eventual abandonment was not evaluated in the Final EAR/IS (refer to Section 4.4 of the EAR/IS – Project Phases and Activities).

### **5.1.3 Integration of Engagement, Consultation, and Indigenous Knowledge**

See Section 19.2.1 and the Record of Engagement and Consultation of the Final EAR/IS for more details.

See Section 19.2.1.5 of the Final EAR/IS for more details on Indigenous Knowledge and other information sources.

#### **5.1.3.1 Rights Assessment Studies for the Project**

As part of the Project’s engagement and consultation process, all 22 Indigenous communities with potential interests in the Project were formally invited to participate in rights assessment studies. Communities were provided with multiple opportunities to share their knowledge, perspectives, and priorities through dialogue, meetings, and technical information exchanges. Please refer to Section 19.2.1 of the Final EAR/IS for more details.

Each community was also encouraged to submit any relevant information, documentation, or community-prepared reports that describe how the Project may affect the exercise of their Aboriginal and Treaty Rights, cultural practices, land use, or overall well-being. This approach was designed so Indigenous perspectives, grounded in lived experience, community history, and Indigenous Knowledge systems were meaningfully considered in the assessment of Project impacts.

As the time of preparation of this Addendum, only one draft report on impacts on rights has been provided to the Project Team in order to support the rights assessment for WSR, as follows:

- “Webequie First Nation Indigenous and Treaty Rights Impact Assessment for the Webequie Supply Road” dated July 9, 2025 (Stantec, 2025).

Inputs from engagement and information from research have been analyzed to inform the rights assessment for the Project, as well as the residual-effects conclusions of associated Valued Components (VCs).

#### **5.1.3.2 Gender-Based Analysis Plus (GBA+)**

Rights considerations associated with the WSR relate to Indigenous rights to safety, culture, land use, equitable participation, and socio-economic well-being. Current rights challenges include overcrowded and substandard housing, high cost of living, food insecurity, limited access to health care, insufficient childcare and Elder care, and restricted access to education, training, and stable employment, all of which disproportionately affect Indigenous women, girls, youth, Elders, persons with disabilities, and LGBTQ2+ individuals. Additional risks linked to the Project include increased exposure to gender-based and family violence, potential rises in substance use, greater strain on already limited community services, and potential disruption to cultural practices and land-based activities. Rights frameworks referenced within Project planning such as the Truth and Reconciliation Commission Calls to Action and the National Inquiry into Missing and Murdered Indigenous Women and Girls Calls for Justice, support requirements for culturally safe policies, Indigenous-led planning, equitable workforce and procurement practices, community-based safety measures, and monitoring mechanisms to ensure that Project benefits are accessible to all community members and that adverse effects do not reinforce existing inequities.



See Section 19.2.1.4.1 of the Final EAR/IS for more details.

### 5.1.3.3 Summary of Indigenous Community Engagement and Information Sources

Desktop research involved collecting and reviewing, where available and permissible, community websites, and recent community documents such as comprehensive community plans, housing plans, community-based land use plans, and development plans.

Primary data is information that is collected firsthand by a researcher or organization specifically for a particular purpose or study. Specific data collection included community-led IKLRU studies completed by First Nations.

**Table 5-2: Summary of Information Available for the Assessment of Effects to Indigenous Peoples and Impacts on the Exercise of Aboriginal and Treaty Rights by Indigenous Community**

Indigenous Community/ First Nation	Summary of Engagement and Consultation
Webequie First Nation	Webequie First Nation indicated their interest to carry out a standalone assessment of rights impacts. As a result, Webequie First Nation supplied both 'Webequie First Nation Indigenous Knowledge Study for the Webequie Supply Road' and 'Webequie First Nation Indigenous and Treaty Rights Impact Assessment for the Webequie Supply Road', which were utilized in assessing severity of impacts on the rights of community members, and also for assessing cumulative effects on rights.
Aroland First Nation	Aroland First Nation is affiliated with Matawa First Nations Management and identified as potentially having impacts to rights by MECP and the Agency. Aroland First Nation has not provided any rights assessment studies nor IKLRU studies for the purposes of the WSR EA/IA process. The community engaged with the Project Team during consultation and engagement periods and provided comments on the EAR/IS.  This Addendum incorporates feedback received during engagement and consultation and comments received for EAR/IS for the purposes of contextualizing cumulative effects on rights, to the extent possible.
Ginoogaming First Nation	Ginoogaming First Nation is affiliated with Matawa First Nations Management and was identified as potentially not having impacts to rights by MECP and the Agency.  Ginoogaming First Nation has formally informed the Project of its limited capacity to participate in engagement and consultation activities and had requested financial support from the Agency to strengthen its ability to contribute. The notification clarified that, given existing capacity constraints, Ginoogaming First Nation would not be able to supply the level of information required to support a comprehensive assessment for the Project.  Ginoogaming First Nation has not provided any rights assessment studies nor IKLRU studies for the purposes of WSR EA/IA process as of date.  The community engaged intermittently with the Project Team during consultation and engagement activities and provided comments on the EAR/IS. This Addendum incorporates the feedback received through those interactions, as well as comments on the EAR/IS, to help contextualize cumulative effects on rights to the extent possible.
Long Lake #58 First Nation	Long Lake #58 First Nation is affiliated with Matawa First Nations Management and was identified as potentially not having impacts to rights by MECP and the Agency.  Long Lake #58 First Nation participated in consultation and engagement activities with the Project Team, where the community provided feedback regarding ongoing activities to complete a water and forestry study, concerns about previous mines, and discussions with Marten Falls First Nation team on an agreement for IK sharing.  Long Lake #58 First Nation has not provided any rights assessment studies nor IKLRU studies for the purposes of WSR EA/IA process as of date. The community also did not provide feedback on the EAR/IS. In the absence of these materials, the Project Team has gathered feedback available through engagement, information shared during discussions, and publicly accessible sources as input for the assessment on potential impacts to Aboriginal and Treaty Rights.

Indigenous Community/ First Nation	Summary of Engagement and Consultation
Marten Falls First Nation	<p>Marten Falls First Nation is affiliated with Matawa First Nations Management and was identified as potentially having impacts to rights by MECP and the Agency.</p> <p>Marten Falls First Nation participated in engagement and consultation. The community provided feedback and concerns at different opportunities.</p> <p>Marten Falls First Nation produced an IKLRU study for input into the EAR/IS. Marten Falls First Nation's concerns were with mainly on cumulative effects of reasonably foreseeable projects, concerns on mining due to previous experiences, follow-up and mitigation activities, and effects on its exercise of rights in its traditional territory.</p> <p>Marten Falls First Nation also provided comments on the EAR/IS. This addendum incorporates the feedback received during the engagement and consultation sessions for purposes of cumulative rights assessment, as appropriate.</p>
Neskantaga First Nation	<p>Neskantaga First Nation is affiliated with Matawa First Nations Management and was identified as potentially having impacts to rights by MECP and the Agency.</p> <p>Neskantaga First Nation has formally informed the proponent of its limited capacity to participate in engagement and consultation activities. The notification clarified that, given existing capacity constraints, Neskantaga First Nation had given consideration for the ToR of the Project, and had provided comments to the extent possible.</p> <p>Neskantaga First Nation engaged at times during the various consultation and engagement opportunities offered throughout the preparation of the EAR/IS. Through these interactions, Neskantaga First Nation raised a range of concerns and provided feedback on subjects including potential environmental impacts, implications for the exercise of Aboriginal and Treaty Rights, climate change considerations, the economic feasibility and long-term sustainability of the Project, and expectations for transparent and timely communication from MECP and the Agency. Additional comments were received regarding archaeological resources, cumulative effects, Project ownership, and other issues of community interest.</p> <p>To-date, Neskantaga First Nation has not submitted an IKLRU study or a rights assessment study, nor has supplemental community-generated data been provided to support a more detailed rights-based analysis. In the absence of these materials, the Project Team has gathered feedback available through engagement, information shared during discussions, and publicly accessible sources as input for the assessment on potential impacts to Aboriginal and Treaty Rights.</p>
Nibinamik First Nation	<p>Nibinamik First Nation is affiliated with Matawa First Nations Management and was identified as potentially having impacts to rights by MECP and the Agency.</p> <p>Nibinamik First Nation engaged intermittently with the Project and provided feedback on several topics, including aggregate resource considerations, proposed temporary camp locations, issues arising from previous mining activities, and concerns regarding limited information sharing from technical reports developed for projects. The First Nation also noted capacity constraints that affected their ability to fully participate in engagement and consultation activities related to the WSR process.</p> <p>To-date, the First Nation has not submitted an IKLRU study or a rights assessment study for the Project.</p> <p>Nibinamik First Nation provided comments on the EAR/IS, which provides further input for the rights assessment, described herein.</p>
Constance Lake First Nation	<p>Constance Lake First Nation is affiliated with Matawa First Nations Management and was identified as potentially having impacts to rights by MECP.</p> <p>Constance Lake First Nation engaged intermittently with the Project during consultation and engagement sessions. Throughout this period, Constance Lake First Nation provided feedback and recommendations on a range of topics, including environmental protection measures, the cultural and spiritual significance of lands and waters, navigation in waterways considerations associated with new bridge infrastructure, potential impacts to fish and fish habitat, climate change, protections for species at risk, aggregate resource management, and potential linkages to broader regional developments such as the Ring of Fire.</p>



Indigenous Community/ First Nation	Summary of Engagement and Consultation
	<p>Constance Lake First Nation also provided a formal notice regarding capacity limitations that affect their ability to participate fully in Project-related engagement and consultation activities. In addition, they provided comments on the proposed Project timelines and expressed concerns about the challenges First Nations face in achieving meaningful and timely engagement.</p> <p>Constance Lake First Nation provided comments on the EAR/IS, which provides further input for the rights assessment, described herein.</p>
Eabametoong First Nation	<p>Eabametoong First Nation is affiliated with Matawa First Nations Management and was identified as potentially having impacts to rights by the Agency.</p> <p>Eabametoong First Nation engaged with the Project during the Aboriginal Treaty Rights Information (ATRI) Forum in June 2024. Eabametoong First Nation provided feedback on several topics including consultation and engagement, land and resource use and social environment.</p> <p>Their concerns focused on lack of meaningful inclusion in planning, unresolved land use and jurisdiction issues, and social challenges affecting community well-being. They noted being excluded from Webequie First Nation's community-based land use planning and that earlier attempts at regional planning with nearby First Nations fell apart. Elders hold mixed views on proposed road projects, raising concerns about increased drug access, impacts on traditional medicinal plants, and child safety. They also emphasized a traditional travel route along the Wabasso River and noted ongoing uncertainty around hunting practices outside their territory.</p> <p>Despite these concerns, Eabametoong First Nation is open to collaboration such as broadcasting Project information on local radio.</p> <p>Eabametoong First Nation conducted a preliminary review of the EAR/IS and identified concerns. This includes the use of a narrow area to assess Eabametoong First Nation's Aboriginal and Treaty Rights. Eabametoong provided its Aboriginal and Treaty right core use and occupancy area of interest. Eabametoong First Nation emphasizes that the current EAR/IS does not adequately account for accurate traditional territory, the cumulative effects of regional mining activities, or questions about road governance and long-term management.</p>
Kashechewan First Nation	<p>Kashechewan First Nation is a member of Mushkegowuk Council and was identified as potentially having impacts to Aboriginal and Treaty Rights by MECP as a result of the Project.</p> <p>Kashechewan First Nation engaged with the Project during Consultation Round 2 of the EA/IA process. Kashechewan First Nation asked questions regarding the economic environment and potential opportunities for employment associated with the construction of the Project.</p> <p>Kashechewan First Nation also provided a formal review on the EAR/IS where they expressed concerns about water and sediment quality. They noted that they would like to see proper mitigation and monitoring implemented and they would like to be informed throughout the Project lifecycle of any follow-up/monitoring programs. They also had concerns regarding water levels in the muskeg and how it will be maintained; noise levels from construction and road traffic during operations impacting wildlife movement patterns; changes to wildlife migration patterns from the operation of the road; increased vehicle strikes with wildlife on the road; and opening up the region to more development.</p>
Fort Albany First Nation	<p>Fort Albany First Nation is a member of Mushkegowuk Council and was identified as potentially having impacts to rights by MECP and the Agency.</p> <p>Fort Albany First Nation engaged with the proponent and raised concerns that the ToR lacked key environmental, cultural, and cumulative effects considerations. It emphasized insufficient treatment of muskeg and peatlands, hydrological changes, mercury mobilization, Species at Risk, insects, and historical cumulative pressures on Indigenous land use. They also stressed the need for community-specific socio-economic analysis, a clearer rights assessment approach, and full consideration of their previous submissions. COVID-19 capacity limitations hindered participation, leading Fort Albany to request that the ToR not proceed until revisions are incorporated and meaningful engagement is possible.</p>



Indigenous Community/ First Nation	Summary of Engagement and Consultation
	<p>Fort Albany First Nation also submitted a letter on the EAR/IS stating that their participation does not constitute consent and expressing deep concern that the EAR/IS inadequately assesses cumulative effects on their homelands, waters, culture, and Treaty Rights. They noted being treated as peripheral to the Project despite downstream and muskeg-related impacts, and highlighted difficulty reviewing highly technical documents, resulting in a partial review focused on major issues. They adopted Attawapiskat First Nation's comments, stressed the need to include foreseeable developments in cumulative effects analysis. The letter also condemns the recent Protect Ontario by <i>Unleashing Our Economy Act</i> and <i>Building Canada Act</i> as threats to Treaty 9 rights and asks for assurance that Webequie First Nation will not support their use to accelerate or weaken regulatory oversight of the Project.</p> <p>Fort Albany First Nation provided a IKLRU study for the purposes of the Project, and have indicated that a rights assessment will be completed as well.</p>
Attawapiskat First Nation	<p>Attawapiskat First Nation is a member of Mushkegowuk Council and was identified as potentially having impacts to rights by MECP and the Agency.</p> <p>Attawapiskat First Nation participated in the review of the Project's ToR and the EAR/IS and raised several concerns regarding the potential environmental and cumulative effects of the Project on its lands, waters, wildlife, and the exercise of Aboriginal and Treaty Rights. They emphasized that peatland drainage, hydrological alteration, mercury methylation, habitat fragmentation, and impacts to caribou, fish, and migratory birds have not been adequately assessed, and that the ToR relies too heavily on narrow inventory-based indicators rather than ecosystem-level analysis. Attawapiskat also noted that foreseeable regional developments associated with the Ring of Fire, including induced roads and transmission lines, were excluded from cumulative effects considerations, and stressed that the interactive effects of climate change and the proposed road must be analyzed through rigorous technical methods.</p> <p>Across engagement opportunities, Attawapiskat First Nation expressed concerns with consultation processes, noting limited notice for key sessions, lack of meaningful involvement of grassroots rights holders, and delays in receiving responses to information requests such as baseline caribou data and EAR/IS chapters. They also raised questions about the assessment of shared territories, land use planning, alternatives evaluation, the role of federal agencies, and clarity regarding road ownership and governance. Attawapiskat reiterated that virtual meetings are not culturally appropriate and that meaningful in-person engagement has been constrained by capacity and public health conditions due to the COVID-19 pandemic.</p> <p>Attawapiskat First Nation also submitted a letter raising concerns that the EAR/IS does not meet the Crown's Treaty obligations or the duty to consult and accommodate. They stated that the cumulative effects assessment is inadequate because it excludes reasonably foreseeable induced developments, such as new hydroelectric projects, roads, and transmission lines, and does not follow the Tailored Impact Statement Guidelines or expectations for a collaboratively developed cumulative effects framework. Attawapiskat also noted that the effects assessment for caribou substantially underestimates impacts and contains contradictory information about disturbance and road-related habitat loss. They emphasized that foreseeable hydroelectric development on the Attawapiskat and Albany Rivers must be included in cumulative effects analyses across all valued components. Finally, they stated that the failure to incorporate climate change into the cumulative effects assessment is unacceptable and must be addressed.</p>
Kasabonika Lake First Nation	<p>Kasabonika Lake First Nation is a member of Shibogama First Nations Council and was identified as potentially having impacts to rights by MECP and the Agency.</p> <p>Comments were received from a member of Kasabonika First Nation describing concerns about how the Project will address upstream and downstream impacts to fish habitat, maintain fish passage, and mitigate losses to trapping, fishing, and tourism. They highlighted the need for clear caribou protection measures during road design and operation and recommended establishing a co-management and environmental monitoring group to ensure meaningful First Nation involvement. They also emphasized the need for broader and ongoing consultation (including engagement with individual members, trappers, and Elders with translation support) and raised concerns about consultation during COVID-19 and how calls for a moratorium from other First Nations would be considered. Finally, they asked how</p>



Indigenous Community/ First Nation	Summary of Engagement and Consultation
	<p>cumulative effects from the wider Ring of Fire developments, not just the supply road, will be assessed.</p> <p>To-date, Kasabonika Lake First Nation has not submitted an IKLRU study or a rights assessment study, nor has supplemental community-generated data been provided to support a more detailed rights-based analysis. In the absence of these materials, the Project Team has gathered feedback available through engagement, information shared during discussions, and publicly accessible sources as input for the assessment on potential impacts to Aboriginal and Treaty Rights.</p>
Kingfisher Lake First Nation	<p>Kingfisher Lake First Nation is a member of Shibogama First Nations Council and was identified as potentially having impacts to rights by MECP.</p> <p>Kingfisher Lake First Nation expressed an interest in participating in the IKLRU Program following receipt of email invitation from the Project Team.</p>
Wapekeka First Nation	<p>Wapekeka First Nation is a member of Shibogama First Nations Council and was identified as potentially having impacts to rights by MECP.</p> <p>No comments were received from Wapekeka First Nation.</p>
Wawakapewin First Nation	<p>Wawakapewin First Nation is a member of Shibogama First Nations Council and was identified as potentially having impacts to rights by MECP.</p> <p>No comments were received from Wawakapewin First Nation.</p>
Wunnumin Lake First Nation	<p>Wunnumin Lake First Nation is a member of Shibogama First Nations Council and was identified as potentially having impacts to rights by MECP.</p> <p>No comments were received from Wunnumin First Nation.</p>
Kitchenuhmaykoosib Inninuwug First Nation	<p>Kitchenuhmaykoosib Inninuwug First Nation is a member of Independent First Nations and was identified as potentially having impacts to rights by MECP.</p> <p>No comments were received from Kitchenuhmaykoosib First Nation.</p>
Weenusk (Peawanuck) First Nation	<p>Weenusk First Nation is a member of Mushkegowuk Council and was identified as potentially having impacts to rights by MECP and the Agency.</p> <p>Weenusk (Peawanuck) First Nation raised a range of concerns related to downstream impacts, protection of their traditional territory, and the adequacy of consultation throughout the EA/IA process. They emphasized that as a downstream community, any changes to water flow, peatland hydrology, or contamination from the Project could significantly affect their water quality, fish, caribou, polar bears, geese, and other key species central to their food security and cultural practices. They highlighted the need for clear assessment of upstream–downstream effects, protection of peatlands, and inclusion of recent hydrological findings such as subsurface “water tunnels” in impact predictions. They also noted concerns about potential increases in non-resident harvesting, which could worsen over-harvesting and affect the availability of country foods relied upon by the community.</p> <p>They described the importance of including Indigenous Knowledge and Land Use information into the EAR/IS and requested clarity on appropriate study areas for the Aboriginal and Treaty Rights Valued Component. They noted the importance of being involved in water, wildlife, and fish monitoring programs, and shared that they are already undertaking several monitoring initiatives in their territory. They expressed concerns about cumulative effects from the Project and future Ring of Fire-related developments, including fuel spills, hydrological changes, downstream contamination, and long-term effects on species facing population shifts due to climate change. They also stressed the need for coordinated discussions among all affected First Nations, asked whether the Project was seeking their permission, and raised questions about appropriate road construction methods in peatland environments. Throughout engagement, they emphasized that their lands remain largely pristine and culturally significant, and that protecting water, wildlife, and peatlands is central to safeguarding their rights, identity, and future generations.</p> <p>Weenusk First Nation also submitted a letter outlining concerns that the EAR/IS does not adequately assess risks to their Section 35 rights, downstream water systems, or culturally important species such as caribou, whose migration routes and birthing areas intersect the Project study area. They emphasized the need for Weenusk-led Species at Risk monitoring</p>



Indigenous Community/ First Nation	Summary of Engagement and Consultation
	<p>beyond construction, as well as a hydrology study to assess peatland water movement and contaminant pathways, noting that existing groundwater studies are insufficient and that several mitigation measures in the EAR/IS are assumptions lacking supporting detail. They highlighted risks to community health, food security, and safety, including increased non-member access and potential reduced harvesting due to contamination concerns, and stated that mitigation measures for these impacts require clearer, culturally informed development. They also stressed their governance rights over their traditional territory, noted that key Project details and studies remain incomplete, and requested ongoing community-to-community dialogue and collaborative development of mitigation measures as the Project advances.</p> <p>Weenusk First Nation provided comments on the EAR/IS, which provides further input for the rights assessment, described herein.</p>
North Caribou Lake First Nation	<p>North Caribou Lake First Nation is a member of Windigo First Nations Council and was not identified as potentially having impacts to rights by MECP or the Agency.</p> <p>No comments were received from North Caribou Lake First Nation.</p>
Mishkeegogamang First Nation	<p>Mishkeegogamang First Nation does not have a tribal affiliation and is deemed an independent First Nation. Mishkeegogamang First Nation was not identified as potentially having impacts to rights by MECP or the Agency.</p> <p>Mishkeegogamang First Nation expressed interest in meeting with the Project Team.</p>
Métis Nation of Ontario – Region 2	<p>Métis Nation of Ontario – Region 2 is a member of Métis Nation of Ontario and was not identified as potentially having impacts to rights by MECP or the Agency.</p> <p>Métis Nation of Ontario – Region 2 commented that information regarding the Métis presence in the Project area should be added to the reports. They also expressed an interest to review all reports although they were still uncertain on their level of participation within the consultation process for the Project.</p>

## 5.1.4 Net Effects Characterization

The EAR/IS and this Addendum has integrated information made available to the proponent through the EAR/IS preparation to-date, including a community-led Indigenous rights impact assessment for Webequie First Nation, and submission of Indigenous Knowledge and Land and Resource Use (IKLRU) studies by Indigenous communities, as well as comments from Indigenous communities on the review of EAR/IS documentation and engagement and consultation activities and available secondary information.

Potential impacts that were assessed as having a low to high potential to occur were carried forward to Severity Characterization for further assessment. Potential impacts that were assessed as negligible or with no potential to occur were not carried forward in the assessment. The conclusions are based on the following qualitative ranking categories:

- **No impact:** there is **no potential** for the impact to occur. Further assessment is not considered.
- **Negligible:** the potential impact is **unlikely to occur**. Changes to Aboriginal Treaty Rights are **not detectable**. No mitigation or enhancement measures are necessary. Further assessment is not considered.
- **Low:** the potential impact is **unlikely to occur** and changes to Aboriginal Treaty Rights may **not be detectable** in the absence of mitigation or enhancement measures. The impact is carried forward in the assessment.
- **Moderate:** the potential impact is **likely to occur** and changes to Aboriginal Treaty Rights **will be evident** in the absence of mitigation or enhancement measures. The impact is carried forward in the assessment.
- **High:** the potential impact is certain to occur and changes to Aboriginal Treaty Rights will be evident. In the absence of mitigation or enhancement measures. The impact is carried forward in the assessment.

## 5.1.5 Severity Characterization

Following the implementation of mitigation and enhancement measures, net effects on Aboriginal and Treaty Rights may remain. The predicted net effects on Webequie First Nation's Aboriginal and Treaty Rights are described in the subsections that follow and are from the Webequie First Nation Indigenous and Treaty Rights Impact Assessment for the Webequie Supply Road. No other rights impact assessment studies were received from Indigenous communities for the Project.

The Agency provides guidance and identifies criteria that may be used to inform the assessment of severity of potential adverse effects on Aboriginal and Treaty Rights (IAAC, 2024).

**Table 5-3** outlines the definition for low, moderate and high severity of impacts on the rights of Indigenous Peoples provided in guidance by the Agency (IAAC, 2024). Additionally, **Table 5-4** presents a suite of criteria provided in guidance from the Agency (IAAC, 2024) used to support evaluation of level of severity of impacts on Aboriginal and Treaty Rights. These criteria are considered together in the assessment, along with context derived from baseline conditions (Section 19.2 of Final EAR/IS), description of effects (Section 19.3 of Final EAR/IS and **Section 6** of this Addendum), and proposed mitigation and enhancement measures (**Section 6.5** of this Addendum) to describe the severity of impacts of the Project on Indigenous Peoples' Rights and Values.

**Table 5-3: Degree of Severity for Adverse Impacts on Aboriginal and Treaty Rights**

Severity	Definition
Low Severity	<ul style="list-style-type: none"> <li>▪ Impacts are likely to be minor in scale, short duration, infrequent, small in spatial extent, reversible or readily avoided or reduced;</li> <li>▪ Cultural well-being is minimally disrupted;</li> <li>▪ No or few effects to health and/or country foods;</li> <li>▪ Few (or no) existing or proposed developments or historic impacts in group's territory;</li> <li>▪ Project and activities in alignment with group's development, land or water use plans;</li> <li>▪ Subgroups of the population are resilient enough to sustain impacts and maintain exercise of rights; and</li> <li>▪ Mitigation should allow for the practice of the right to continue in the same or similar manner as before any impact.</li> </ul>
Moderate Severity	<ul style="list-style-type: none"> <li>▪ Impacts are likely to be medium in scale, moderate duration, occasionally frequent, possibly/partially reversible, spatial extent affects preferred use areas or disrupts interconnectedness and/or knowledge transfer;</li> <li>▪ Cultural well-being is impeded or altered;</li> <li>▪ Impacts to individual and/or community holistic health, including perceptions of impacts; project interacts with a few preferred areas where rights can be practiced, and some historic, existing or proposed development and/or disturbance;</li> <li>▪ Project may not be compatible with aspects of land use plans or application of traditional laws and governance;</li> <li>▪ Vulnerable subgroups are likely to experience higher impact on ability to exercise rights; and</li> <li>▪ Mitigation may not fully ameliorate impact but should enable the Indigenous group to continue exercising its rights as before, or in a modified way.</li> </ul>
High Severity	<ul style="list-style-type: none"> <li>▪ Impacts are likely to be major in scale, permanent/long-term, frequent, possibly irreversible and over a large spatial extent or within an area of exclusive/preferred use;</li> <li>▪ Cultural well-being is disrupted, impeded or removed;</li> <li>▪ Project interacts with only area where a right may be exercised and many historic, existing or proposed developments and/or disturbance;</li> <li>▪ Decision-making associated with governance and title adversely affected;</li> <li>▪ Subgroups will be disproportionately impacted by the project and experience no to little benefit; and</li> <li>▪ Mitigation is unable to fully address impacts such that the practice of the right is substantively diminished or lost.</li> </ul>

**Table 5-4: Criteria for Characterization of Predicted Severity on Aboriginal and Treaty Rights\***

Characterization Criteria	Description	Quantitative Measure or Definition of Qualitative Categories*
Likelihood	The likelihood of an impact on rights occurring can be based on knowledge and experience with similar past impacts. The full lifecycle of a project, including its various stages and lifespan, should be considered in determining the likelihood of an effect occurring.	<p><b>Low</b> – A potential impact is unlikely, but could occur</p> <p><b>Moderate</b> – A potential impact is likely but may not occur</p> <p><b>High</b> – An impact is highly likely to occur</p>
Geographic Extent	Geographic extent refers to the spatial area over which the impact is predicted to occur.	<p><b>Low</b> – The impact could occur over a small spatial extent relating to the exercise of rights. Impacts not expected within areas of preferred or exclusive use</p> <p><b>Moderate</b> – The impact could occur over a moderate spatial extent relating to the exercise of rights. Impacts may occur within areas of preferred use.</p> <p><b>High</b> – The impact could occur over a large spatial extent relating to the exercise of rights. Impacts expected within areas of preferred use.</p>
Frequency, Duration and Reversibility	Frequency describes how often an impact could occur within a given time period (e.g., alteration of aquatic habitat will occur twice per year). Duration refers to the length of time that an impact on a right is discernible (e.g., day, month, year, decade, or permanent). A reversible impact is one where the exercise of rights is expected to recover from the impact caused by the project. This would correspond to a return to baseline conditions, or other target, through mitigation or natural recovery within a reasonable time scale as defined by the Indigenous community.	<p><b>Low</b> – The impact lasts less than 5 years (i.e. approximate duration of construction phase). The impact would be confirmed to one discrete period during the life of the project. The impact may be reversed in the short term.</p> <p><b>Moderate</b> – The impact may last up to one generation. The impact would occur at sporadic, intermittent intervals and throughout the operation and decommissioning of the project. The impact may be reversed within one generation.</p> <p><b>High</b> – The impact is likely to persist over multiple generations. The impact would occur constantly during, and potentially beyond, the life of the project. The impact cannot be reversed either in whole or in part.</p>
Cultural Well-being	Impacts of the project on the ability of a group to continue customs, traditions and practices that are integral to the group's distinct culture.	<p><b>Low</b> – No or little indication that there would be an impact on areas of cultural importance. The impact is not likely to impede peaceful access to practice cultural activities. The Indigenous group has only minor concerns about impacts from the project or activity on health or integrity of the resources and/or places used to practice rights.</p> <p><b>Moderate</b> – There may be an impact on areas and/or practices of cultural importance. The impact may impede or alter access to practice cultural activities. There may be a loss of habitat or availability of culturally important species. The disturbance may be of a physical or sensory nature (i.e., noise, dust, visual quality).</p> <p><b>High</b> – There would likely be an impact on areas and/or practices of cultural importance. Multiple impacts could occur in one area of high importance. There would likely be loss of habitat or availability and quality of culturally important species. Access to areas required to practice cultural activities would likely be obstructed or limited. The disturbance may be of a physical or sensory nature (i.e., noise, dust, visual quality) or may affect laws, knowledge, customs and/or spiritual and cultural practices.</p>

Characterization Criteria	Description	Quantitative Measure or Definition of Qualitative Categories*
Health	Considerations of physical, mental, emotional and spiritual health, including Indigenous views of health.	<p><b>Low</b> – The Indigenous community has minor to no concerns about impacts from the project or activity on health. The project is not likely to pose environmental effects to health, including effects to country foods.</p> <p><b>Moderate</b> – There may be an impact on physical, mental, emotional and/or spiritual aspects of health on an individual and/or broader community basis. The environmental effects from the project are related to food or cultural species important to traditional diets, and socio-economic effects related to food security. The exercise of rights is altered due to quantifiable and/or perceived effects from the project.</p> <p><b>High</b> – There are significant environmental effects from the project tied to food or cultural species, and related socio-economic considerations. The group has serious concerns about impacts to holistic and/or traditional models of health. Perception of effects on health interferes with, alters, and/or stops the exercise of Aboriginal rights. The project is likely to impact health on a community-wide level.</p>
Cumulative Effects**	Cumulative effects on a right may result from a project in combination with impacts of past, existing and future projects or activities.	<p><b>Low</b> – The project or activity would be in an area with few existing impacts and there is little development in the community's territory. The project is not likely to have cumulative effects.</p> <p><b>Moderate</b> – The project may interact with one of only a few preferred areas where rights can still be practiced. There are other land uses, including proposed or existing projects, in the community's territory that impact the practice of rights. The project may cause environmental effects on a species that is culturally important that is also a federally or provincially listed species at risk.</p> <p><b>High</b> – The project may interact with the only area where a particular right can be practiced. The project may cause significant effects on a species that is culturally important that is also a federally or provincially listed species at risk. The rights which may be impacted by the project are not currently practiced in the preferred manner because of conservation issues, lack of access or government policies or programs. There are many historic, current or proposed projects in the area, and a high level of existing disturbance.</p>
Governance	Planning and management or stewardship of traditional lands and resources. Indigenous governance and decision-making authority may be expressed through a specific laws, norms, power, and language.	<p><b>Low</b> – There is a high level of cooperation between the proponent and Indigenous community. The community has formally indicated to the Crown that risks from the project are acceptable or have been accommodated. The project and activities take place in areas designated by the community for development and align with land or water use plans.</p> <p><b>Moderate</b> – Indigenous community has expressed concern about impacts of the project. The community has stated that some impacts remain after mitigation and/or accommodation. The community has indicated that the project may not be compatible with certain aspects of their land use plans or application of traditional laws and governance.</p>



Characterization Criteria	Description	Quantitative Measure or Definition of Qualitative Categories*
		<b>High</b> – The project would likely prevent or restrict use of areas or title. The project may cause interference in traditional land management and governance regime. The community has indicated that the project is not compatible with their land use plans, application of traditional laws or future aspirations, and that no mitigation or accommodation would be able to offset the impacts. Impacts would be such that the community has stated their culture would not withstand the impact.
Impact Inequity	Impacts on subpopulations of a community (including women, Elders, youth, Two-Spirit individuals, and others) with consideration of risks and benefits for members of the sub-population, and likely resiliency of the sub-population to negative impacts	<p><b>Low</b> – Subgroups of the population are resilient enough to sustain impacts of the project and maintain the exercise of their rights. The impacts would be temporary and would allow for sustained transfer of knowledge and exercise of right to continue into the future. Potential benefits resulting from the project would allow for development at all segments of the community.</p> <p><b>Moderate</b> – Transfer of knowledge between generations may be interrupted for a moderate period of time by the project. Vulnerable subgroups of the population are likely to experience a higher impact on their ability to exercise rights. Impacts may be reversed within one generation. Some benefits may accrue to subgroups.</p> <p><b>High</b> – Subgroups of the population will be disproportionately impacted by the project and experience little to no benefit. Intergenerational transfer of knowledge would be interrupted for an extended time period and may not be reversed in whole or part.</p>

\* Characterization criteria were developed in view of the ‘Guidance: Assessment of Potential Impacts on the Rights of Indigenous Peoples’ by the Agency (IAAC, 2024). \*\*See methodology used to determine cumulative effects.

## 6 Assessment of Project Effects on the Exercise of Aboriginal and Treaty Rights

This section identifies and describes the potential pathways of effects through which the proposed Project may affect the exercise of Aboriginal and Treaty Rights associated with current and historical use of lands and resources for traditional purposes, cultural continuity, socio-economic, health and well-being and self-determination and self-governance. Utilizing information shared by Webequie First Nation, LSA and RSA communities, the analysis outlines potential pathways on how Project components may influence access to lands and resources, environmental conditions necessary for harvesting, and the cultural practices connected to these rights. For the identified pathways, potential effects are outlined, and mitigation measures are proposed to help avoid, reduce, or manage impacts.

Webequie First Nation completed their Aboriginal and Treaty Rights Impact assessment prior to the completion of the Project’s Final EAR/IS.



# 6.1 Current and Historical Use of Lands and Resources for Traditional Purposes

## 6.1.1 Pathways of Effect

### 6.1.1.1 Webequie First Nation

**Construction activities → Loss and/or alteration of lands and resources for traditional harvesting → Availability, quality and quantity of traditionally harvested resources → Reduced ability to exercise harvesting rights**

**Construction activities → Loss of and/or alteration of sites and areas used for traditional harvesting → Reduced ability to exercise harvesting rights**

**Construction activities → Loss of and/or alteration of access to lands and resources used for traditional harvesting → Reduced ability to exercise harvesting rights**

**Construction activities → In-migration of temporary workers → Increased non-local population → Increased demand for harvested resources → Reduced ability to exercise harvesting rights**

Project construction activities may disturb or modify lands, soils, vegetation communities, and resource areas that Webequie First Nation rely on for fishing, hunting, plant gathering, and other traditional practices. Webequie First Nation identified areas where the Project overlaps with areas used by the community for hunting, trapping, fishing, food and medicinal plant harvesting and habitation sites. Several eskers that are important to the community are located along the Project route (Stantec Inc, 2025). Eskers provide important habitat for wildlife, particularly small mammals and migrating birds and they also contain culturally significant medicines that are not found in the surrounding muskeg. Construction will lead to a loss of the medicine and habitat for the small mammals and migrating birds (Stantec Inc, 2025).

Construction activities may reduce the availability, quality, or quantity of culturally important species through vegetation clearing, habitat fragmentation, soil contamination, changes to hydrology, and introduction of invasive species. Sensory disturbance could impact animal migration patterns and impact hunting and trapping for Webequie First Nation members (Stantec, 2025). An Elder explained that disturbance of soils, clays, plants, trees, and rock during construction could cause these natural materials to enter nearby waterbodies, where they may act like natural chemicals and influence water quality (WFN 2024a). Increased sedimentation could adversely affect fish health and habitat during construction (Stantec Inc, 2025).

Changes in water levels could hinder travel on waterways, limiting Webequie First Nation's ability to access traditional lands and waters. Community members also raised specific concerns about potential effects on a spring water site located near the Project's proposed Aggregate Source Pile 2 (Stantec Inc, 2025). They noted that this and other drinking-water sources could be affected by Project activities. One Elder stated that the Webequie Supply Road would not alter the flow of spring water and that springs would continue to run. However, others emphasized that they remain concerned about potential effects on spring water sites on Eastwood Island (Webequie May 2025 sessions) (Stantec Inc, 2025).

Accidents or spills could also introduce contaminants into the surrounding lands and waters. Such substances may affect wildlife or fish within the LSA and RSA, which could influence the quality of harvested meat from those species (Stantec Inc, 2025). Webequie First Nation members may experience a reduced ability to carry out traditional harvesting practices, either because key resources become less abundant, reduction in quality or

perceived quality of harvested resources or because harvesting areas are altered to the point that they no longer support traditional use. Construction activities may also disturb specific sites or areas that hold importance for traditional harvesting. These can include plant harvesting sites, medicinal plant sites, preferred hunting and trapping areas, culturally important locations and fishing sites.

Construction may introduce temporary or long-term access restrictions, which could potentially limit physical access to lands and resources used for traditional harvesting, regardless of whether the resources themselves are directly altered. Reduced access may lead to decreased harvesting opportunities, increased travel time or cost, and barriers to practicing rights in preferred locations. Constraints on access diminish the ability of Indigenous harvesters to meaningfully exercise their harvesting rights, especially for families or Elders who rely on well-established routes. Even if resources remain available elsewhere, the loss or alteration of valued harvesting sites can disrupt long-standing land-use patterns, reduce opportunities for knowledge transmission, and diminish the cultural significance associated with harvesting in familiar and meaningful places. This leads to a reduced ability to exercise harvesting rights at sites that hold cultural, familial, or intergenerational importance.

Construction activities may bring an influx of temporary workers to the region, increasing the non-local population. If non-local individuals participate in local hunting, fishing, or gathering, this added pressure on wildlife and plant resources could reduce the availability of resources harvested by community members, limiting Webequie First Nation's ability to exercise harvesting rights.

**Operations and maintenance activities → Loss and/or alteration of lands and resources for traditional harvesting → Availability, quality and quantity of traditionally harvested resources → Reduced ability to exercise harvesting rights**

**Operations and maintenance activities → Loss of and/or alteration of sites and areas used for traditional harvesting → Reduced ability to exercise harvesting rights**

Operations and maintenance activities have the potential to result in the loss, disturbance, or alteration of lands and resources that support traditional harvesting practices. Vegetation clearing, ground disturbance, equipment movement, periodic maintenance of access routes, and ongoing presence of workers and road users may alter habitat conditions and influence the distribution or abundance of wildlife, fish, and plant species relied upon for harvesting.

Changes to habitat quality, noise disturbance, altered hydrology, or increased sensory disruption from the Project once operational can affect the availability, quality, and quantity of traditionally harvested resources, including game species, fish, medicinal plants, berries, and materials used for cultural purposes. Reduced abundance or displacement of species from preferred harvesting areas may limit opportunities for community members to harvest in culturally preferred locations or may require individuals to travel farther to access equivalent resources. These changes may result in a reduced ability for Webequie First Nation to exercise harvesting rights, including hunting, fishing, trapping, and gathering. Reduced harvesting locations, decreased predictability of where resources can be found, or deterioration of culturally important species can in turn affect food security, intergenerational knowledge transfer, and the cultural continuity associated with land-based practices.

Operation and maintenance activities may directly disturb or alter specific sites and areas used for traditional harvesting, such as plant harvesting locations, traplines, fishing spots, plant gathering areas, and culturally preferred areas for harvesting. The Project will intersect trails and travel routes identified by Webequie First Nation (Stantec Inc, 2025). Physical disturbance, vegetation removal, noise, or changes in access conditions can reduce the suitability of these areas for harvesting activities or diminish their cultural value. If harvesting locations become degraded, or no longer capable of supporting preferred harvesting practices, community members may be prevented from using sites that hold cultural, familial, or historical importance. These



disruptions can reduce opportunities to engage in harvesting in ways that align with cultural protocols, seasonal practices, and oral traditions.

Operation and maintenance activities may directly affect access to traditional resources and culturally important sites by the direct loss or alteration of trails and travelways, harvesting and culturally significant areas, or limitations on exercising Indigenous and Treaty Rights near the Project footprint (Stantec Inc, 2025). Such loss or alteration may result from physical disturbance or destruction or landscape changes that make trails or travel routes partially or fully unrecognizable. Changes in travel conditions, such as increased vehicle traffic, may further affect the continued use of these areas. Sensory disturbances, including noise from operation and maintenance activities and emissions from vehicle traffic, may also influence access and lead Webequie First Nation members to avoid or travel farther from harvesting areas or culturally important sites within the LSA.

The Project's operation and maintenance phase may limit the meaningful exercise of Aboriginal and Treaty Rights, not only by affecting individual species but also by impacting the places and landscapes that support culturally significant harvesting activities.

**Operations and maintenance activities → Easier access to lands and resources for traditional harvesting → Increased ability to exercise harvesting rights**

Webequie First Nation community informants noted several positive changes they expect to see after the road is built, including easier access to traditional areas where moose and goose are harvested or distant traplines. Study participants reported that the Webequie Supply Road will make it easier to access areas for harvesting wood (Stantec Inc, 2025).

The Project is also expected to generate positive effects on Webequie First Nation's ability to access traditional lands and waters. The Project could improve access to locations, areas, and resources that support the exercise of Webequie First Nation's Indigenous and Treaty Rights and may make it easier for community members to spend time on the land. Webequie First Nation has indicated that the Project could also enable the development of new trails and additional travel routes, enhancing access to preferred harvesting areas and to more distant traplines (Stantec Inc, 2025). The Project would not only be a travel corridor but also support the creation of new access routes (Stantec Inc, 2025).

Operation and maintenance activities may reduce physical barriers that previously limited Webequie First Nation community members ability to reach preferred harvesting locations. Improved travel conditions can shorten travel times, increase safety, and allow Elders or members with mobility challenges to more easily participate in land-based activities.

Increased access can facilitate the meaningful exercise of harvesting rights and easier access may enable more frequent harvesting trips, support intergenerational knowledge transfer, and strengthen cultural continuity tied to land use.

Reliable access may extend the usable harvesting season (e.g., earlier spring or later fall access), allowing community members to take advantage of seasonal availability of culturally important species. This can contribute positively to community food security and the availability of materials required for cultural practices.



### 6.1.1.2 Other LSA and RSA Communities

**Construction activities → Loss and/or alteration of lands and resources for traditional harvesting → Availability, quality and quantity of traditionally harvested resources → Reduced ability to exercise harvesting rights**

**Construction activities → Loss of and/or alteration of sites and areas used for traditional harvesting → Reduced ability to exercise harvesting rights**

**Construction activities → Loss of and/or alteration of access to lands and resources used for traditional harvesting → Reduced ability to exercise harvesting rights**

**Construction activities → In-migration of temporary workers → Increased non-local population → Increased demand for harvested resources → Reduced ability to exercise harvesting rights**

**Operations and maintenance activities → Loss and/or alteration of lands and resources for traditional harvesting → Availability, quality and quantity of traditionally harvested resources → Reduced ability to exercise harvesting rights**

**Operations and maintenance activities → Loss of and/or alteration of sites and areas used for traditional harvesting → Reduced ability to exercise harvesting rights**

Other LSA and RSA communities have also communicated concerns regarding the potential effects of the Project as Project construction and operations phase activities may disturb or modify lands, soils, vegetation communities, and resource areas that LSA or RSA communities rely on for fishing, hunting, plant gathering, and other traditional practices.

Available information indicates that LSA and RSA communities have identified areas used for hunting, trapping, fishing, plant harvesting, and habitation that overlap with the LSA and RSA. Construction and operations phase activities may result in the loss of plant and wildlife habitat. Construction phase activities could potentially reduce the availability or quality of culturally important species through vegetation clearing, habitat fragmentation, soil disturbance, hydrological changes, or the introduction of invasive species. Sensory disturbances may influence animal movement or migration and may in turn affect hunting and trapping opportunities for community members. Any Project-related changes that limit access to harvesting areas, affect wildlife availability, or alter the conditions under which hunting, trapping, fishing, harvesting and habitation occurs may disrupt the cultural teachings and the meaningful exercise of associated Aboriginal and Treaty Rights.

Attawapiskat First Nation has asserted that their traditional territory extends into the WSR Project Area due to the location of the Attawapiskat River. Attawapiskat First Nation stated that the Project needs to consider that disruptions to the peatlands amid rapid climate change can create feedback loops that are difficult to accurately predict and mitigate, and that can have consequences for fish and wildlife far outside the immediate project footprint.

Aroland First Nation noted that their concerns include potential for direct impacts to their community and traditional territory that would result from the potential connection of the Project to the provincial highway system, as well as the potential for cumulative effects that would result from additional road and mining developments in the region.

Constance Lake First Nation noted that the baseline studies have not adequately included Indigenous Knowledge to assess baseline conditions. Constance Lake First Nation remains concerned about the cumulative effects of the Project as it could alter land use within the surrounding region.



Eabametoong First Nation noted that one of their concerns is the EAR/IS using mapping that is based on incorrect understanding of their current and historic use. Eabametoong First Nation have asserted that Figure 19-5 of the EAR/IS, the “area of interest for planning” does not reflect even half of their traditional territory.

According to the community, the Project may affect Fort Albany First Nation members’ harvesting, trapping, fishing and gathering rights by disrupting culturally significant harvesting, travel, and land-based practices. Road construction and operation may lead to habitat loss, altered animal movement patterns, reduced wildlife health, and contamination concerns that diminish opportunities for hunting, trapping, fishing, and plant gathering (Firelight Research Inc and Fort Albany First Nation, 2024). Changes to water flow, quantity, and quality and impacts to sensitive muskeg ecosystems may further limit access to safe drinking water, ceremonial water use, and subsistence fishing. The Project may also impede traditional travel routes and access to camps, reducing opportunities for families to gather on the land and transmit cultural knowledge. These effects may constrain the meaningful exercise of Aboriginal and Treaty Rights within the LSA and RSA.

Fort Albany First Nation have outlined that cumulative impacts have already substantially impaired their ability to practice Treaty Rights in much of their territory and that “this Project is likely to result in adverse effects to Fort Albany First Nation lands, use of lands, practice of Treaty and Aboriginal rights, and well-being” (Firelight Research Inc and Fort Albany First Nation, 2024). Fort Albany First Nation hunting and trapping practices are rooted in a deep understanding of animal behaviour, seasonality, and the physical landscape. These practices depend on a broad range of tangible and intangible knowledge systems that are part of Fort Albany First Nation’s way of life (Firelight Research Inc and Fort Albany First Nation, 2024). Changes in the flight patterns of migratory birds was an issue raised by multiple participants in the Fort Albany First Nation IKLRU study. Community members observed that waterfowl no longer migrate over the Fort Albany area as they once did with changes seen the past 15–20 years (Firelight Research Inc and Fort Albany First Nation, 2024). While the specific causes of altered migration routes cannot be conclusively attributed to any single factor, Fort Albany First Nation members associated these changes with broader anthropogenic stressors including climate change and development of linear infrastructure (Firelight Research Inc and Fort Albany First Nation, 2024). Hunting is also a critical cultural practice for Fort Albany First Nation because it supports the continuation of key cultural values and provides an essential setting for the transmission of intergenerational knowledge. Fort Albany First Nation members rely on a wide range of plant species for food, medicine, cultural practices, and other traditional purposes. Continued access to these species, particularly within preferred harvesting areas, such as family traplines is fundamental to the meaningful exercise of Fort Albany First Nation members’ Treaty Rights. Limitations on availability or access to these plant resources may adversely affect subsistence practices, cultural continuity, and the community’s overall health and well-being. Fort Albany First Nation members have noted that the “ability to practice fishing rights depends on numerous factors, such as access to equipment, fuel, and specialized harvesting skills and confidence in being on the land and waters” (Firelight Research Inc. and Fort Albany First Nation, 2024). Any Project interaction with water could potentially impact the ability of Fort Albany First Nation to fish. Hunting, gathering, fishing and trapping practices reinforce cultural identity, stewardship responsibilities, and community cohesion. “Changes to water levels in the river also have far reaching impacts on Fort Albany First Nation’s ability to conduct resource gathering activities (and all the food security impacts or cultural continuity impacts connected with this practice)” (Firelight Research Inc. and Fort Albany First Nation, 2024). Any changes that alter wildlife availability, access to harvesting areas, or the conditions under which harvesting occurs have the potential to adversely impact Fort Albany First Nation Indigenous rights. Disruptions to habitat quality, animal behaviour, or seasonal patterns could weaken the community’s ability to practice traditional harvesting in culturally meaningful ways and translate into impacts on the meaningful exercise of Indigenous rights.

Kashechewan First Nation has noted that the WSR Project has the potential to adversely impact Kashechewan’s Section 35 rights and jurisdiction (Kashechewan First Nation with MNP LLP, N.D). The availability of clean, uncontaminated traditional foods is essential to the meaningful exercise of Kashechewan First Nation’s harvesting rights and to sustain their long-standing way of life. Access to healthy, culturally important foods



through year-round harvesting remains a central component of community well-being, food security, and the continuation of traditional land-based practices. Increased noise may alter movement of harvested species and may impact Kashechewan's abilities to harvest in a preferred manner (Kashechewan First Nation with MNP LLP, N.D). Potential changes in fish quantity as a result of Project-related impacts to spawning/reproductive sites, habitat quality and availability, and water quality may adversely affect the availability of fish in areas frequented by Kashechewan harvesters (Kashechewan First Nation with MNP LLP, N.D). The Project has the potential to increase access to the area by non-Indigenous land users, which may lead to greater hunting pressure and expanded exploration activities. This may impact on the distribution and availability of species relied upon by Kashechewan First Nation harvesters (Kashechewan First Nation with MNP LLP, N.D). The Kashechewan First Nation IKLRU study noted that the Project is "predicted to contribute to climate change trends in the region." (Kashechewan First Nation with MNP LLP, N.D). Changes in staging areas for migrating waterfowl and alterations to moose mating grounds may disrupt established harvesting patterns, resulting in "challenges for harvesting activities" (Kashechewan First Nation with MNP LLP, N.D). No harvesting sites were identified within the Kashechewan First Nation IKLRU study to be within the LSA or RSA. The potential changes to water systems, contaminants, noise, habitat conditions, and increased development pressure associated with the proposed Project may affect Kashechewan First Nation's continued ability to use and rely on the land in ways consistent with long-standing cultural practices.

Marten Falls First Nation members expressed concern that the expansion of Western influence or development in the region may discourage members from living off the land or engaging in traditional land-based practices. Participants noted that disruptions to natural cycles caused by increased development could contribute to ecological imbalances (Suslop Inc, 2024). Some expressed worry that the expansion of roads, along with the likelihood of additional development such as mining, infrastructure projects, or even new settlements, could limit opportunities to live from the land and to engage in harvesting practices that are essential for sustenance, cultural continuity, and identity (Suslop Inc, 2024). Marten Falls First Nation community members have expressed concerns about road development impacting access to travel routes. "Access to travel routes is important for the safe movement of Marten Falls First Nation members. Travel routes should therefore be maintained and protected from development activities in the region" (Suslop Inc, 2024). Caribou are a culturally significant species for Marten Falls First Nation and a participant of the Marten Falls First Nation IKLRU study expressed concerns that the Project could disrupt migratory routes and lead to caribou being hit or killed by vehicles on the road (Suslop Inc, 2024). Marten Falls First Nation members who participated in the Study expressed concerns that the proposed roads, including the WSR, could introduce additional pollution into their traditional territory. Participants highlighted potential impacts related to water contamination, noise, industrial dust, and littering. Many were concerned that road construction, maintenance, and associated industrial activity could lead to the release of chemicals, oil, and dust into nearby waterways and groundwater (Suslop Inc, 2024). This could lead to impacts on the health and size of animal and fish populations. Marten Falls First Nation members also shared concerns that new road access may enable outsiders to more easily reach culturally important areas and locally harvested resources. Participants worry that this increased access could lead to overhunting and overfishing, contributing to declines in key wildlife and fish populations. Such changes may reduce the availability of resources that support traditional and current land use practices. This could also potentially create interpersonal conflicts between Marten Falls First Nation members and people outside of the Marten Falls First Nation community (Suslop Inc, 2024).

Weenusk First Nation has affirmed that harvesting is a fundamental aspect of their Section 35 rights, including their Treaty 9 rights and that their traditional use and rights extend into the Project area (Weenusk First Nation with MNP LLP, N.D). These rights are exercised throughout Weenusk's traditional territory. Harvesting activities encompass hunting, fishing, and trapping (recognized under Treaty 9), as well as gathering plants, medicines, and berries (protected under Section 35). As part of these rights, Weenuski Inninowuk are entitled to access lands and waters within their traditional areas in an uncompromised state, and to hunt, trap, fish, and gather in a meaningful and preferred manner (Weenusk First Nation with MNP LLP, N.D). Meaningful stewardship supports



Weenuski Inninowuk's ability to practice their harvesting rights in a preferred, culturally grounded manner. Protecting the integrity of the environment is essential to ensuring that these rights can continue to be exercised fully and without compromise. The ability to access preferred harvesting areas and uncontaminated, undeveloped food sources is essential to the meaningful exercise of Weenusk First Nation's harvesting rights (Weenusk First Nation with MNP LLP, N.D). Participants noted that harvesters from other communities have increasingly begun accessing Weenusk First Nation's traditional areas. They suggested this is likely the result of activity or development occurring farther south, pushing non-Weenusk harvesters northward. This growing presence has created congestion in key harvesting locations and is viewed as an encroachment on Weenusk's traditional territory. Such encroachment affects Weenuski Inninowuk's ability to meaningfully exercise their constitutionally protected harvesting rights, which rely on access to their lands without interference (Weenusk First Nation with MNP LLP, N.D). The ability to harvest or gather in a preferred and meaningful manner is integral to the exercise of Weenusk First Nation's rights (Weenusk First Nation with MNP LLP, N.D). Preferred harvesting conditions include the remote nature of the area, lack of non-Indigenous users, and the availability of abundant, healthy resources support Weenuski Inninowuk in practicing their rights. When these conditions are maintained, community members can continue to exercise their harvesting rights fully, safely, and without interference. Weenusk First Nation holds inherent and constitutionally protected rights, including rights affirmed under Section 35 of the *Constitution Act*, 1982 and Treaty 9, to steward and manage the resources within their traditional areas according to Weenuski Inninowuk knowledge, values, and preferred practices. Effective resource management is necessary to sustain culturally important resources for current community needs and for future generations. Any reduction in the availability of, or access to, resources within Weenusk First Nation's traditional areas has the potential to adversely affect the Nation's ability to exercise these rights and to fulfill their stewardship responsibilities. Any changes would constitute an impact on Weenusk First Nation's Indigenous and Treaty Rights (Weenusk First Nation with MNP LLP, N.D).

Changes to water levels or hydrological conditions could potentially influence travel on waterways and may limit access to traditional lands and waters. Accidents or spills could introduce contaminants to surrounding lands and waters. If this occurred, it could affect wildlife or fish within the LSA or RSA and influence the perceived or actual quality of harvested resources. Depending on the extent and location of construction activities, areas used for plant harvesting, medicinal plant collection, hunting, trapping, or fishing could be disturbed, which may influence the ability of community members to continue using these sites as they have historically.

Construction activities could also introduce temporary or long-term access constraints. Such constraints may limit physical access to harvesting areas, even where resources themselves remain unchanged. Reduced access may lead to fewer harvesting opportunities, increased travel time or cost, and challenges for Elders or families who rely on established routes. If familiar harvesting sites become difficult to reach or no longer support preferred practices, this may affect long-standing land use patterns, knowledge transmission, and the cultural significance associated with harvesting in specific places.

An influx of temporary workers could increase local population pressure. If non-local individuals engage in hunting, fishing, or gathering, this could reduce resource availability for LSA and RSA members and potentially influence the community's ability to exercise harvesting rights.

During operations and maintenance, vegetation clearing, ground disturbance, equipment movement, and the continued presence of workers and road users may alter habitat conditions or influence species distribution. Changes in habitat quality, hydrology, or sensory conditions could affect the availability or quality of harvested species, which may require harvesters to travel farther or adapt practices. These potential changes could influence the ability of LSA and RSA community members to exercise harvesting rights in preferred locations.

Operational activities may also alter or affect specific harvesting sites or travel routes identified by the community. Physical disturbance, noise, and changes in landscape conditions may influence the suitability or cultural value of these areas. If familiar sites become degraded or inaccessible, opportunities for culturally



grounded harvesting practices and intergenerational knowledge transfer may be diminished. Operational and maintenance activities may affect access to traditional resources or culturally important sites if trails, travelways, or harvesting areas become altered or less recognizable. Increased traffic and sensory disturbance may also lead community members to avoid areas within the LSA. Such changes have the potential to limit the meaningful exercise of Aboriginal and Treaty Rights by affecting not only the resources themselves but also the places and landscapes that support culturally significant harvesting activities.

**Operations and maintenance activities → Easier access to lands and resources for traditional harvesting  
→ Increased ability to exercise harvesting rights**

Marten Falls First Nation noted in their IKLRU study that the proposed roads, including the WSR, could make Marten Falls First Nation traditional territory more accessible to its members (Suslop Inc, 2024). This may improve access to traditional lands for harvesting activities and some members will be able to drive directly to their traplines or preferred hunting and fishing areas, rather than having to travel long distances across land or water by foot or by using off-road vehicles or watercraft (e.g., snowmobiles or canoes) (Suslop Inc, 2024). This improved access could benefit Elders who can continue to participate in land and water-based activities despite health or mobility issues as well as the younger generation as the road would make it easier for families to go out on the land (Suslop Inc, 2024).

Improved access to traditional lands may influence how community members exercise their harvesting rights across generations. Easier road access to hunting areas, traplines, fishing sites, campsites, and other culturally significant places could support continued land use for some Elders, particularly those facing mobility or health challenges, by reducing the need for long overland or water travel. At the same time, increased accessibility may also shape how younger generations engage with the territory. Community members noted that the ability to bring children and youth onto the land more easily could strengthen opportunities for intergenerational knowledge transfer, helping sustain teachings related to land use practices and Indigenous Knowledge. These changes may enhance participation in traditional activities but may also alter travel patterns and the ways in which these rights are traditionally practiced.

Increased access can facilitate the meaningful exercise of harvesting rights and easier access may enable more frequent harvesting trips, support intergenerational knowledge transfer, and strengthen cultural continuity tied to land use. Reliable access may extend the usable harvesting season (e.g., earlier spring or later fall access), allowing community members to take advantage of seasonal availability of culturally important species. This can contribute positively to community food security and the availability of materials required for cultural practices.

Marten Falls First Nation members stated that an increased MNRF presence, or the involvement of game wardens could help prevent overhunting and overfishing. However, they also emphasized that such oversight must not lead to harassment of community members. They stressed the need for balance: ensuring adequate monitoring to protect wildlife while avoiding government encroachment on traditional practices and on Aboriginal and Treaty Rights (Suslop Inc with Marten Falls First Nation, 2024).

## 6.1.2 Summary of Net Effects

**Table 6-1** below is a summary of conclusions made for each of the identified potential impacts on Rights associated with current and historical use of lands and resources for traditional Purposes. Please refer to **Section 5.1.4** for detailed information on net effects characterization methods.

**Table 6-1 Summary and Conclusion of Potential Impacts on Aboriginal and Treaty Rights**

Potential Impacts	Study Area	Potential for Occurrence	Carry forward in Assessment?
Rights associated with Current and Historical Use of Lands and Resources for Traditional Purposes	LSA: Webequie	Low	Yes
	LSA: Other communities	Low	Yes
	RSA	Low	Yes

Note: This characterization is based on the input received from “Webequie First Nation Indigenous and Treaty Rights Impact Assessment for the Webequie Supply Road” and the Project’s team interpretation of the rights impact assessment and is subject to validation from the community (Stantec Inc, 2025)

### 6.1.3 Severity Characterization

Please refer to **Section 5.1.5** for detailed information on net effects characterization methods.

#### 6.1.3.1 Webequie First Nation

Webequie First Nation completed their Aboriginal and Treaty Rights Impact assessment prior to the completion of the Project’s Final EAR/IS.

##### Harvesting

Impacts to Webequie First Nation harvesting rights during both construction and operations have been characterized as follows (Stantec Inc, 2025):

- Likelihood: High
- Direction: Adverse
- Geographic Extent: Moderate
- Frequency: Multiple irregular event
- Duration and Reversibility: High
- Equity: Low to moderate
- Cultural Well-being: Low
- Governance: Low
- Health: Low

Effects on harvesting rights have a high likelihood to occur and expected to be adverse as the Project may affect culturally important wildlife, plants, and fish relied on by Webequie First Nation harvesters (Stantec Inc, 2025). Vegetation clearing, habitat loss, and the creation of a permanent linear disturbance are anticipated to potentially influence animal movement and the availability of harvested species. Sensory disturbances (air emissions, noise) may further reduce resource quality and availability.

Webequie First Nation has also expressed concern that Project workers could increase harvesting pressure if hunting or fishing is not restricted. Increased traffic in the area may raise wildlife mortality risks, and sensory disturbances may influence perceptions of the safety of harvested resources. Geographic extent is expected to be moderate, as impacts occur within the LSA and overlap with important harvesting areas that have been identified by Webequie First Nation (Stantec Inc, 2025). The frequency of impacts will occur as multiple irregular events throughout all Project phases. Duration and reversibility are high because the Project is permanent and not planned for decommissioning. Equity impacts are predicted to be low to moderate, with active harvesters



more directly affected than other community members. Cultural well-being impacts related to harvesting rights are expected to be low, as effects are mostly within the LSA and are not expected to significantly constrain harvesting activities (Stantec Inc, 2025).

As Webequie First Nation is the Project proponent, and the Project will follow community laws and protocols, impacts on governance or resource management are expected to be low. Health-related impacts are also expected to be low as environmental exposures have been identified to be below Health Canada benchmarks, though habitat loss and sensory disturbance may still restrict current harvesting practices (Stantec Inc, 2025).

### **Rights to Access to Traditional Land and Water**

Impacts to Webequie First Nation rights to access to traditional land and water during both construction and operations have been characterized as follows (Stantec Inc, 2025):

- Likelihood: High
- Direction: Adverse and Positive
- Geographic Extent: Moderate
- Frequency: Multiple irregular event
- Duration and Reversibility: High
- Equity: Low to moderate
- Cultural Well-being: Low
- Governance: Low
- Health: Low

Effects on access to traditional lands and water have a high likelihood of occurring and are expected to be both adverse and positive for Webequie First Nation (Stantec Inc, 2025). The Project will intersect established trails and travel routes and may limit access to traditional resources or culturally important areas through trail loss or alteration, restricted ability to navigate to and through harvesting areas and culturally important areas, or reduced ability to exercise Indigenous and Treaty Rights near the Project. These effects may result from physical disturbance, obstructions from Project infrastructure or activities, landscape changes that make trails unrecognizable, or altered conditions such as increased vehicle traffic. Sensory disturbances (noise, air emissions) may also influence access by encouraging members to travel farther from harvesting areas or culturally important sites in the LSA (Stantec Inc, 2025).

The Project is also expected to create positive effects by improving access to traditional lands and waters once the road is constructed. Improved travel routes may support the exercise of Indigenous and Treaty Rights, enable members to spend more time on the land, and facilitate the development of new trails to preferred harvesting areas and distant traplines (Stantec Inc, 2025).

Geographic extent of impacts is predicted to be moderate, as trail disruptions will occur within the Project footprint and influence travel patterns across the LSA. Impacts will occur as multiple irregular events throughout all Project phases. Duration and reversibility are high because the Project is permanent and not planned for decommissioning. Equity impacts are expected to be low to moderate, with active land users experiencing the most notable positive and adverse effects. Cultural well-being impacts are anticipated to be low, as effects are concentrated in the LSA and are not expected to significantly limit the ability to access traditional lands and waters across the RSA. The Project may also enhance access in some areas. As Webequie First Nation is the Project proponent and construction and operations are expected to follow community laws and protocols, impacts on Webequie First Nation governance of access are expected to be low. Health-related impacts are also expected to be low, as environmental exposures are predicted to remain below Health Canada benchmarks, though trail changes and sensory disturbance may discourage some land users from using traditional routes.



### 6.1.3.2 Other LSA and RSA Communities

This section assesses the extent to which the Project may affect Aboriginal and Treaty Rights associated with the current and historical use of lands and resources for traditional purposes. These rights rely on the continued availability, quality, and accessibility of traditionally harvested resources and on the ability of community members to safely and meaningfully participate in land-based practices.

Information provided by other LSA and RSA Indigenous communities focus on the potential for the Project to disrupt the meaningful exercise of harvesting rights, alter access to sites that support traditional and cultural use and travel, and contribute to cumulative effects on rights associated with both current and historical land use. Communities described the potential for Project-related land alteration, increased activity from non-local populations, and environmental disturbance to reduce the availability, quality, and perceived safety of traditionally harvested resources. These factors may also limit physical access to preferred harvesting locations or disrupt the environmental conditions required to sustain culturally important species. Together, these pressures may reduce the ability of community members to engage in traditional harvesting, transfer knowledge, and uphold rights-based land use practices.

It is anticipated the other LSA and RSA communities will experience **Low** level of severity of Project-related impacts on Indigenous rights associated with current and historical use of lands and resources for traditional purposes. This assessment reflects the traditional importance of lands and resources, and is based on the information provided to the Project Team to-date, with consideration of proposed mitigation and enhancement measures, and it reflects current predictions made with information available.

## 6.2 Cultural Continuity

### 6.2.1 Pathways of Effect

#### 6.2.1.1 Webequie First Nation

**Construction activities → Loss and/or alteration of sites and areas used for cultural and spiritual purposes → Reduced ability to practice spiritual and ceremonial rights → Impacts to the continuation and transmission of rights-based cultural knowledge**

**Construction activities → Loss and/or alteration of access to lands and resources used for cultural and spiritual purposes → Impacts to the continuation and transmission of rights-based cultural knowledge**

Construction activities have the potential to directly and indirectly affect lands, waters, and locations used for cultural and spiritual purposes. These effects can occur through both the loss or alteration of cultural/spiritual sites and changes to access to these areas, each of which can influence the ability to practice spiritual and ceremonial rights and ultimately affect the continuation and transmission of rights-based cultural knowledge. Webequie First Nation identified 1,190 cultural and sacred sites within the LSA and RSA (Stantec Inc, 2024; Stantec Inc, 2025).

#### **Loss or Alteration of Cultural and Spiritual Sites**

Vegetation clearing, ground disturbance, grading, aggregate extraction, realignment of landscape features, and the presence of construction equipment and workers can alter or disturb cultural and spiritual sites. These may include ceremonial grounds, prayer locations, burial sites, culturally significant landforms, and places used for solitude, reflection, and land-based teachings. “When clearing or other Project activities begin, community

members will grieve “inside their hearts” because of the environmental and experiential effects (Stantec Inc, 2024; Stantec Inc, 2025).”

“Environmental effects from vegetation clearing, establishment of work camps and quarries, and construction activities have the potential to reduce the value or importance of sites and areas used for intergenerational teaching and cultural transmission. Sensory disturbances from construction or vehicle traffic during operations may interfere with the quiet enjoyment of the land” (Stantec Inc, 2025).

Webequie First Nation described water as the most vital element supporting their way of life and that lakes, rivers, and other bodies of waters are deeply spiritual places for which the community has a responsibility to protect (Stantec Inc, 2025). The Project may result in residual effects to water quality, quantity and flow and there is a total of 26 water crossings in the proposed alignment of the road, six which will require bridge construction and the remaining 20 that will employ culverts. The Project LSA will intersect two spring water sources identified by the community (Stantec Inc, 2024; Stantec Inc, 2025). “The loss or alteration of cultural and sacred sites, due to Project activities would affect Webequie First Nation’s ability to preserve and maintain a distinct Webequie First Nation cultural identity, which is contingent on meaningful opportunities for intergenerational teaching and cultural transmission. Without these locations, Webequie First Nation’s cultural and experiential rights would be impacted” (Stantec Inc, 2025).

Construction activities may change the sensory environment through increased noise, dust, odour, vibration, or visual intrusion. Cultural experiences may change as a result of machinery use and increased vehicle traffic during clearing and construction of the Project. Participants in the Webequie First Nation IKLRU study noted that an aggregate source pile is located near a “very sacred area” (Stantec Inc, 2024). “The use of heavy machinery, changes to air quality due to airborne dust, and the collection of gravel for Project use is likely to impact Webequie First Nation’s right to quiet enjoyment of the land in relation to this sacred area and aggregate source pile” (Stantec Inc, 2025). These sensory changes could diminish the cultural and spiritual suitability of these places and the ability to meaningfully practice spiritual and ceremonial rights can be reduced or displaced.

It should be noted that the exact location of some cabin sites may vary due to the scale of mapping used during interviews and validation sessions

Reduced ability to practice these rights has broader implications for cultural continuity. Ceremonial and spiritual practices transmit teachings, stories, and cultural knowledge from Elders to youth. When the place-based context for these practices is altered, opportunities for intergenerational cultural learning may be reduced or diminished.

### **Loss or Alteration of Access to Cultural and Spiritual Lands and Resources**

Access to cultural and spiritual areas may also be affected by construction activities. Temporary or permanent restrictions may arise from closures, equipment operation, creation of work zones, increased construction traffic, or physical barriers such as stockpiles or excavation areas. Changes in visibility, noise, or activity levels may disrupt the conditions that support culturally appropriate access, even if the sites themselves remain intact.

Access limitations can discourage or prevent community members from travelling to these areas for ceremony, prayer, teaching, or the gathering of culturally significant resources such as medicines. Because many cultural and spiritual practices are place-based, the inability to reach these sites can directly affect the ability to maintain cultural and spiritual traditions.

Access-related impacts also affect cultural transmission. Elders and Knowledge Holders often conduct teachings, storytelling, and ceremonial instruction on the land in the places where those practices originate. When access becomes difficult, unsafe, or culturally unsuitable, opportunities for youth and community members to learn these practices in context are reduced, which can weaken rights-based cultural knowledge over time.



Project activities including areas of known or potential land clearance associated with the recommended preferred route and supporting infrastructure intersect with several culturally and environmentally significant areas. Direct impacts may result from linear disturbances, bridge and culvert construction, and clearing activities that overlap with travel routes, harvesting areas, culturally sensitive locations, burial areas, language points, and known habitation sites. An aggregate source pile is situated within an area identified by Webequie First Nation as a culturally sensitive zone and an important location for plant harvesting and spring water collection (Section 20). The additional 250-m buffer, while not expected to be cleared, may still be subject to indirect effects on cultural heritage landscapes where it overlaps with important travel routes, harvesting locations, habitation sites, and culturally sensitive areas.

**Construction activities → Expenditures and employment → Change to population and demographics → Change to cultural traditions and practices, including use and preservation of Indigenous languages → Impacts to the continuation and transmission of rights-based cultural knowledge**

Construction activities associated with the Project will generate new employment opportunities and increased expenditures in the region. The Project will attract non-Indigenous workers and result in a temporary shift in the local population and demographic profile (see Section 14 for more details). This may impact cultural practices and language use within Webequie First Nation as the community stated it is “concerned that the community is losing its way of life and language due to colonial processes and systems forcing members to live against or in contrast to traditional values” (Stantec Inc., 2024; Stantec Inc., 2025).

Changes in population and demographics may affect how cultural traditions and practices are carried out. “The presence of outsiders in the community during both construction and operation may infringe on language and cultural revitalization efforts and the ability to maintain the community’s unique dialect, traditions and cultural practices” (Stantec Inc., 2025). The increased presence of non-Indigenous workers may alter the cultural landscape through new social influences, increased English dominant environments and requirements, or change/reduce the participation in land-based cultural activities. These shifts can place pressure on the continued use and preservation of Indigenous languages, particularly when youth spend more time in settings (or access to other modes of communication/devices) where Indigenous languages are not spoken.

“Webequie First Nation is concerned that the Project will result in an influx of outsiders and drugs and alcohol into the community, undermining the ability to maintain language, traditions, and cultural practices. Webequie First Nation members are especially concerned with the influence of technology on the social cohesion and traditional values of the community” (Stantec Inc., 2025). Although adverse effects on language retention may be most pronounced among younger generations, impacts on language transmission and cultural identity will ultimately affect the entire Webequie First Nation community (Stantec Inc., 2025).

As cultural and linguistic practices are deeply connected to place-based activities, land use, and community-driven ways of life, demographic changes may disrupt opportunities for Elders and Knowledge Holders to share teachings with younger generations. If language use declines or cultural practices become less prominent in daily life, the opportunities for transmitting rights based cultural knowledge like oral histories, ceremonial protocols, traditional ecological knowledge, and cultural values may be weakened. Shifts in population and cultural dynamics driven by Project-related employment and expenditures have the potential to influence the continuity and intergenerational transmission of rights based cultural knowledge.

**Operations and maintenance activities → Loss and/or alteration of sites and areas used for cultural and spiritual purposes → Impacts to the continuation and transmission of rights-based cultural knowledge**

**Operations and maintenance activities → Loss and/or alteration of sites and areas used for cultural and spiritual purposes → Reduced ability to practice spiritual and ceremonial rights → Impacts to the continuation and transmission of rights-based cultural knowledge**



Operations and maintenance activities have the potential to cause ongoing or incremental disturbances to lands, waters, and places that hold cultural and spiritual significance for community members. These areas may include ceremonial sites, burial locations, traditional medicine-gathering areas, places used for solitude, reflection, and the practice of spiritual rights. Construction activities such as vegetation removal, road grading, drainage work, equipment use, traffic, and the presence of non-local workers can alter the physical, sensory, and cultural characteristics of these locations.

Loss or alteration of culturally significant sites can diminish their suitability for cultural or spiritual use. Sensory changes with vehicle operations due to changes in noise levels, visual intrusion, dust, reduced privacy, altered hydrology, or changes to vegetation may disrupt the environmental conditions necessary for ceremonies or spiritual connection. These changes may reduce the ability of community members to access, use, or feel comfortable at these places and limit capacity of Webequie First Nation to practice spiritual and ceremonial rights in the ways traditionally maintained.

During operations, the new road may create both positive and negative outcomes. Although improved access to traditional areas could benefit community members, new infrastructure also has the potential to alter cultural heritage landscapes by changing the surrounding environment or disrupting important cultural and spiritual relationships. Additional potential adverse effects include pollution, habitat changes, increased exposure to outside influences, interference with land use practices, safety concerns, diminished connection to the land, and impacts on oral history and cultural continuity.

Many cultural teachings, stories, protocols, and spiritual practices are transmitted on the land and within the specific sites to which they are tied. When these places are lost, altered or become unsuitable for ceremonial use, the opportunities for Elders and Knowledge Holders to pass down and practice cultural teachings to younger generations are reduced. This can weaken intergenerational learning, cultural identity, and the continued practice of rights-based cultural knowledge.

Operations and maintenance activities of the Project may not only affect the condition of cultural and spiritual sites themselves but also lead to reduced ability to engage in cultural practices and ceremonies.

**Operations and maintenance activities → Expenditures and employment → Change to population and demographics → Change to cultural traditions and practices, including use and preservation of Indigenous languages → Impacts to the continuation and transmission of rights-based cultural knowledge**

During the operations and maintenance phase, the Project will generate ongoing employment opportunities, increase economic activities within the area and increased access to Webequie First Nation. Economic activities may lead to the continued presence of non-local workers or increased movement of people into the region. “Impacts to cultural well-being related to effects on cultural and experiential rights are anticipated to be high during operation of the Project as it is considered probable that the Project will introduce outside influences into the community that may affect the ability to maintain language, traditions and cultural practices” (Stantec Inc., 2025).

Changes in population and demographics may contribute to shifts in cultural traditions and practices. Increased interaction with non-local workers, greater exposure to English-dominant environments or requirements, or the presence of outside cultural influences can affect how community members engage in cultural practices or speak Indigenous languages in daily life. These influences may particularly impact youth, who often adopt the social or linguistic norms of the broader population to which they are most exposed. Over time, these demographic pressures can shape the cultural priorities, values, and practices within the community.



Language use and cultural practices are central components of rights-based cultural knowledge, such as bimidziwin. When opportunities to speak Indigenous languages or participate in land-based cultural activities decrease, the mechanisms for transmitting cultural knowledge between generations can be weakened. Elders and Knowledge Holders may have fewer opportunities to share language, stories, and teachings, especially if youth spend more time in environments where Indigenous languages and traditions are not reinforced. This can lead to the erosion of cultural continuity, reduced cultural identity among younger generations, and diminished practice of rights-based knowledge over time.

Expenditures and employment associated with operations and maintenance activities may indirectly influence the long-term vitality of cultural traditions, Indigenous languages, and rights-based cultural knowledge by altering population dynamics, social environments, and patterns of cultural participation within the community.

### 6.2.1.2 Other LSA and RSA Communities

**Construction activities → Loss and/or alteration of sites and areas used for cultural and spiritual purposes → Reduced ability to practice spiritual and ceremonial rights → Impacts to the continuation and transmission of rights-based cultural knowledge**

**Construction activities → Loss and/or alteration of access to lands and resources used for cultural and spiritual purposes → Impacts to the continuation and transmission of rights-based cultural knowledge**

**Construction activities → Expenditures and employment → Change to population and demographics → Change to cultural traditions and practices, including use and preservation of Indigenous languages → Impacts to the continuation and transmission of rights-based cultural knowledge**

**Operations and maintenance activities → Loss and/or alteration of sites and areas used for cultural and spiritual purposes → Impacts to the continuation and transmission of rights-based cultural knowledge**

**Operations and maintenance activities → Loss and/or alteration of sites and areas used for cultural and spiritual purposes → Reduced ability to practice spiritual and ceremonial rights → Impacts to the continuation and transmission of rights-based cultural knowledge**

Vegetation clearing, ground disturbance, grading, aggregate extraction, realignment of landscape features, and the presence of construction equipment and workers can alter or disturb cultural and spiritual sites. These may include ceremonial grounds, prayer locations, burial sites, culturally significant landforms, and places used for solitude, reflection, and land-based teachings.

The Webequie Project Team has received the information summarized below and interprets it as indicating potential impacts on the exercise of Aboriginal and Treaty Rights associated with cultural continuity. Any Project-related changes that limit access to or alter sites and areas used for cultural spiritual purposes occurs may disrupt the cultural teachings and the meaningful exercise of associated Aboriginal and Treaty Rights associated with cultural continuity.

Weenusk First Nation cultural landscapes and connection to the land are central to the Weenuski Inninowuk identity, worldview, and way of life. This fundamental relationship provides the context through which traditional knowledge and cultural practices are understood, transmitted, and sustained across generations. Connection to the land encompasses living from the land, respecting the animals, and honouring the teachings passed down by Elders. Practices such as offering tobacco after harvesting animals reflect the values of respect, reciprocity, and stewardship that guide Weenusk First Nation's way of life. The relationship between cultural landscapes and connection to the land can also be understood through the water systems that extend across the Weenusk First Nation's traditional territory. The Winisk River and interconnected water systems that sustain essential



resources, including fish, wildlife, and vegetation, and shape the natural pathways used to travel throughout the territory. In this way, the water systems support Weenusk First Nation's continued ability to access and connect with culturally significant sites, maintain traditional practices, and uphold relationships tied to place (Weenusk First Nation with MNP LLP, N.D). IKLRU study participants explained that sharing is an important aspect of Weenusk First Nation culture and is essential to ensuring everyone has enough food. They noted that harvested foods are often shared with the community during feasts, reinforcing the cultural value of sharing and supporting overall cultural well-being. Weenusk First Nation IKLRU study participants expressed concerns about Weenusk First Nation's ability to continue teaching younger generations and passing on cultural knowledge if development pressures and associated impacts continue to accumulate within Weenusk First Nation's traditional areas. If important cultural sites, storied places, and teaching areas are damaged, altered in appearance, or become difficult to access, Weenusk First Nation's capacity to sustain cultural transmission and maintain its way of life may be significantly reduced. Participants noted that these impacts may not be immediate, but cumulative effects over the next several years could result in younger generations facing increasing challenges in learning how to navigate the land, understand traditional harvesting areas, and uphold practices such as hunting and trapping, activities that have already begun to decline in some parts of the territory. Ensuring that youth can continue to learn from the land and from the teachings of previous generations was identified as an essential priority (Weenusk First Nation with MNP LLP, N.D). IKLRU study participants expressed concern that younger generations may not be able to practice Weenusk First Nation culture and way of life as development increasingly encroaches on traditional areas. They noted that while current impacts are noticeable, future generations are expected to experience much greater changes, with fewer opportunities to engage in land-based activities and cultural practices enjoyed by previous generations (Weenusk First Nation with MNP LLP, N.D). These concerns indicate potential impacts on cultural continuity, particularly through reduced access to cultural sites, diminished opportunities for cultural learning, and changes that may constrain intergenerational knowledge transmission.

Indigenous cultures and identities are deeply connected to the land. When Marten Falls First Nation community members are unable to use their traditional territories, essential elements of their cultural identity may be lost. Protecting the ecological integrity of these lands is therefore critical, ensuring that future generations can continue to access, use, and sustain the land and resources that help shape their identity as Indigenous Peoples (Suslop Inc with Marten Falls First Nation, 2024). Moose and caribou are a culturally significant species for Marten Falls First Nation. The Marten Falls First Nation IKLRU study participants have raised concerns that development activities, particularly blasting, could disturb features that hold cultural and oral-history significance. Specifically, there is worry that breaking up rock formations may damage areas understood to be the homes of the Ma-makwa-se-sak (the 'Little People'), thereby negatively affecting important cultural beliefs and traditions (Suslop Inc with Marten Falls First Nation, 2024). Community members are also concerned that outsiders may disturb burial sites, historic areas (such as former settlements), or other culturally significant places. They believe such disturbance could occur as a result of development or other activities. Marten Falls First Nation community members emphasized that the loss of cultural sites contributes to community dysfunction. Marten Falls First Nation community members emphasized the need for cultural programs and activities to help support the maintenance of their culture, traditions, and languages. They also noted that youth should play a role in shaping progress and development, as they will ultimately use the roads and experience future changes. Additionally, Marten Falls First Nation community members expressed that certain areas within and around the community's traditional territory should be preserved for cultural activities and retreats. To prevent outsiders from disturbing burial, historic, and cultural sites, some members recommended that roads not be built in areas where such impacts are likely (Suslop Inc with Marten Falls First Nation, 2024). These concerns point to potential impacts on cultural continuity by affecting culturally significant places, disrupting cultural teachings, and reducing opportunities for intergenerational transmission of knowledge and practices.



Kashechewan First Nation IKLRU study respondents emphasized the significance of spending time on the land and passing cultural knowledge to younger generations through language and observing the land. Most noted that they learned harvesting practices from their parents and grandparents. It was also highlighted that schoolteachers play an important role in sharing and reinforcing Kashechewan First Nation's Way of Life and cultural teachings with youth. The Project is expected to consider changes to the cultural environment that may affect the transmission of cultural knowledge to future generations (Kashechewan First Nation with MNP LLP, N.D.). Harvesting is viewed as a way to address challenges such as the high cost of store-bought foods while supporting overall well-being through cultural connections to traditional practices and a continued relationship with the land. Respondents described Kashechewan First Nation's relationship with the Kistachowan Sipi as vital, noting that cultural, social, health, and economic well-being all stem from this connection. The Kistachowan Sipi system flows through Kashechewan First Nation's traditional territories, sustaining the terrestrial and aquatic environments that support harvested resources such as fish, wildlife and vegetation. Travel routes along the Kistachowan Sipi and its tributaries enable community members to access their traditional lands for harvesting and to reach culturally significant sites. A number of cultural sites along the river were also identified for the IKLRU study, including an archaeological site, burial sites, ceremonial and cultural sites, named places, areas with important stories, and teaching sites (Kashechewan First Nation with MNP LLP, N.D.).

Hunting and trapping form essential elements of Fort Albany First Nation's cultural heritage, influencing and informing multiple dimensions of the community's cultural expression. Fort Albany First Nation IKLRU study participants emphasized that hunting and trapping are essential not only for accessing culturally preferred foods but also for sustaining their subsistence-based livelihoods. These practices additionally create opportunities to spend extended periods on the land, strengthen family kinship, and foster the intergenerational transmission of land-based connections and cultural knowledge (Firelight Inc. and Fort Albany First Nation, 2024). Engaging in hunting activities also provides an important opportunity for knowledge sharing and the transmission of key elements of Fort Albany First Nation culture to younger generations. Many participants of the IKLRU study stated recalling beginning to hunt at a very young age alongside their family (Firelight Inc. and Fort Albany First Nation, 2024). Cedar is used for both ceremonial and medicinal purposes, which highlights the spiritual significance of plants and their role across various dimensions of Fort Albany First Nation culture and way of life. IKLRU study mentions participants experiencing a profound sense of peace, safety, freedom, connection, and solitude while spending time on the land. Others characterized their time on the land as healing and energizing and as an opportunity for discovery, and a source of spirituality. As much of Fort Albany First Nation's Indigenous Knowledge and cultural practice relates to knowing and subsisting from the land, knowledge transmission and broader cultural continuity depend heavily on the ongoing health of lands, waters, animals, and other resources. Fort Albany First Nation knowledge transmission is, in part, rooted in learning how previous generations lived successfully on the land and applying these ways of being within a contemporary context (Firelight Inc. and Fort Albany First Nation, 2024). Fort Albany First Nation's matrimonial clan system represents an important dimension of their cultural identity, one that was significantly disrupted by colonization. In addition, the continued dominance of colonial legislation has created substantial barriers to Fort Albany First Nation's efforts to reclaim and exercise their traditional laws within the current socio-political context, even where there is a clear desire to uphold Fort Albany First Nation's inherent and Treaty Rights. IKLRU study participants identified several pathways through which the construction and operation of the proposed road projects could affect Fort Albany First Nation cultural continuity. These concerns relate both to the potential for environmental impacts along the proposed routes and to the broader socio-cultural implications of increased access to the region. Participants emphasized that such changes could facilitate additional industrial development, influence social well-being and community cohesion in view of existing cumulative effects in the area, and ultimately affect Fort Albany First Nation community members' ability to practice their land-based way of life. Given that Fort Albany First Nation's Omushkegowuk/Cree culture and way of life are inextricably connected to the lands and waters of their traditional territory, and to the values, knowledge systems, and harvesting practices that sustain them, any disruption to these foundations poses risks to the continuity of Fort Albany First Nation's culture across generations (Firelight Inc. and Fort Albany First Nation, 2024). The study underscored the importance of



environmental health to the practice and transmission of culture, and participants expressed concerns about the potential introduction of pollution and contamination into the environment as a result of the Project. Another participant linked the Proposed Roads to a further erosion of connection to the land and reduced opportunities for Fort Albany First Nation community members to pass on knowledge intergenerationally, which are issues that are already challenged by existing social pressures within the Fort Albany First Nation. One participant also characterized the proposed road projects as a form of globalization and as yet another encroachment into what they described as the community’s ‘last frontier’ of Indigenous culture and heritage (Firelight Inc. and Fort Albany First Nation, 2024).

The concerns identified by other LSA and RSA communities describe potential pathways through which Project-related changes may influence cultural continuity for their communities. Community members emphasized the importance of cultural landscapes, access to harvesting areas, culturally significant sites, and land-based travel routes as foundations for cultural identity, intergenerational knowledge transmission, and the practice of spiritual and ceremonial traditions. Activities associated with construction, operations, and increased access to the region may alter or disturb these culturally important places, disrupt the conditions required for land-based learning, and reduce opportunities for youth and future generations to participate in cultural practices. Across the LSA and RSA, these potential disruptions correspond to established pathways of impact. These include the loss or alteration of cultural and spiritual sites, reduced ability to practice ceremonial rights, changes to population and land-use patterns, and diminished access to teaching areas. These pathways could affect the continuation and transmission of rights-based cultural knowledge within Indigenous communities.

## 6.2.2 Summary of Net Effects

**Table 6-2** below is a summary of conclusions made for each of the identified potential impacts on Rights associated with Cultural Continuity. Please refer to **Section 5.1.4** for detailed information on net effects characterization methods.

**Table 6-2 Summary and Conclusion of Potential Impacts on Aboriginal and Treaty Rights**

Potential Impacts	Study Area	Potential for Occurrence	Carry forward in Assessment?
Rights associated with Cultural Continuity	LSA: Webequie	Moderate	Yes
	LSA: Other communities	Low	Yes
	RSA	Low	Yes

Note: This characterization is based on the input received from “Webequie First Nation Indigenous and Treaty Rights Impact Assessment for the Webequie Supply Road” and the Project’s team interpretation of the rights impact assessment and is subject to validation from the community (Stantec Inc., 2025)

## 6.2.3 Severity Characterization

Please refer to **Section 5.1.5** for detailed information on net effects characterization methods.

### 6.2.3.1 Webequie First Nation

Webequie First Nation completed their Aboriginal and Treaty Rights Impact assessment prior to the completion of the Project’s Final EAR/IS.

## Cultural and Experiential Rights

Impacts to Webequie First Nation cultural and experiential rights during both construction and operations have been characterized as follows (Stantec Inc., 2025):

- Likelihood: High
- Direction: Adverse
- Geographic Extent: Moderate
- Frequency: Multiple irregular event
- Duration and Reversibility: High
- Equity: Low
- Cultural Well-being: Low during construction; high during operation
- Governance: Low during construction; moderate during operation
- Health: Low during construction; moderate during operation

Effects on cultural and experiential rights are assessed as having a high likelihood of occurring and are expected to be adverse in direction as the Project is anticipated to cause direct or indirect disturbances to culturally important sites and areas used for intergenerational teaching and cultural transmission. Environmental changes associated with vegetation clearing, work camps, quarry development, and construction activities may diminish the value or significance of these sites. Sensory disturbances from construction and increased vehicle traffic during operations may affect the quiet and respectful enjoyment of the land. Webequie First Nation has expressed concerns that the Project may bring an influx of outsiders, as well as drugs and alcohol, into the community. These influences are viewed as potentially undermining the community's ability to sustain language, traditional practices, and cultural values. Webequie First Nation members also identified concerns about the influence of new technologies on social cohesion and traditional cultural norms (Stantec Inc, 2025).

The geographic extent of impacts is predicted to be moderate, as effects will occur within the LSA and may extend into the community. The frequency of effects is expected to involve multiple, irregular events throughout all phases of the Project. Duration and reversibility are rated high, given that the Project is intended to operate permanently and is not planned for decommissioning (Stantec Inc, 2025).

“The Project is predicted to have a low impact on equity as Project effects may not be directly experienced by all segments of the community, but adverse effects on cultural and experiential rights will be felt by Webequie First Nation as a whole” (Stantec Inc, 2025). While impacts on language retention may be most evident among younger generations, Webequie First Nation will be affected by impacts to language transmission and cultural identity.

Impacts to cultural well-being associated with effects on cultural and experiential rights are expected to be low during site development and construction, as most effects will be contained within the LSA and Webequie First Nation members will continue to have opportunities to engage in intergenerational learning and cultural transmission on the land. During Project operations, the impacts on cultural well-being are expected to be high, as the introduction of outside influences is considered likely to affect the community's ability to maintain language, traditions, and cultural practices (Stantec Inc, 2025).

Webequie First Nation is the Project proponent, and the Project is expected to be constructed and operated in alignment with community laws, customs, and governance structures. Effects on the ability to govern or manage cultural and experiential rights are assessed as low during construction and moderate during operations. This is due to concerns that the presence of outsiders and increased availability of drugs and alcohol could weaken the community's capacity to uphold cultural norms and practices (Stantec Inc, 2025).



Health-related impacts associated with changes to cultural and experiential rights are predicted to be low during construction and moderate during operations. Project-related effects on Webequie First Nation's ability to maintain language, traditions, and cultural practices have the potential to produce notable implications for overall community well-being (Stantec Inc, 2025).

### 6.2.3.2 Other LSA and RSA Communities

This section assesses the extent to which the Project may affect Aboriginal and Treaty Rights associated with cultural continuity. This can include intergenerational transmission of cultural practices, knowledge systems, languages, and rights-based land use activities that support the ongoing exercise of Aboriginal and Treaty Rights associated with cultural continuity. Information provided by the other LSA and RSA Indigenous communities outline concerns about how the Project may affect culturally important lands, travel routes, and harvesting areas that support ongoing cultural practices. These concerns align with established pathways through which rights associated cultural continuity may be affected, including the potential for construction and operations to alter or remove sites and areas used for cultural and spiritual purposes, restrict access to lands and resources, and introduce demographic changes that may influence cultural traditions, practices, and language use. Such changes have the potential to reduce opportunities to practice spiritual and ceremonial rights, disrupt preferred harvesting and land-based activities, and limit intergenerational transmission of cultural knowledge. Even with minimal information, these pathways suggest that other LSA and RSA communities may experience similar effects that influence the continuation and transmission of rights-based cultural knowledge tied to land, culture, and identity. The analysis considers how Project-related construction and operations activities may influence the ability of LSA and RSA communities to maintain current and historical cultural practices connected to lands, waters, and resources.

It is anticipated the other LSA and RSA communities will experience **Low** level of severity of Project-related impacts on Indigenous rights associated with cultural continuity. This assessment reflects the importance cultural practices, knowledge systems, Indigenous languages and cultural sites and areas of Indigenous communities, and is based on the information provided to the Project Team to-date, with consideration of proposed mitigation and enhancement measures, and it reflects current predictions made with information available.

## 6.3 Socio-Economic, Health and Well-Being

### 6.3.1 Pathways of Effect

#### 6.3.1.1 Webequie First Nation

**Construction activities → Environmental disturbance and contamination risk → Changes to availability, quality, or perceived safety of traditional foods → Decreased reliance on land-based nutrition → Impacts to food security and health-related rights**

Construction activities can lead to environmental disturbance and an increased risk of contamination, which in turn may affect the availability, quality, and perceived safety of traditional or country foods. These impacts can undermine community confidence in water and land-based harvesting practices and disrupt intergenerational transmission of knowledge systems tied to country foods. As access to safe, culturally significant country food sources declines, Webequie First Nation may become increasingly reliant on external, commercial or store-bought foods. This shift not only reduces access to healthy country food choices but also erodes food sovereignty which is an inherent right of Indigenous Peoples. This would in turn diminish the ability for Webequie First Nation, to access and control their food systems, land-based practices, and traditional harvesting activities.



When food sovereignty is weakened, so too are the cultural, spiritual, and governance structures that depend on relationships with the land and its resources.

As mentioned in Appendix Q of the Final EAR/IS, during in-person interviews, community members expressed concern that construction of the Webequie Supply Road may disrupt traplines and affect their ability to harvest traditional foods, with potential implications for health (Intrinsik, 2023). They also noted that construction noise could scare away wildlife, making hunting more difficult (Intrinsik, 2023). Noise disturbance can alter animal behaviour, pushing species farther into the bush and reducing access to familiar hunting areas during the construction phase. These temporary changes may potentially limit traditional food harvesting and affect knowledge transfer to youth about hunting locations and land use. Reduced participation in traditional activities may also be exacerbated by construction-related employment of community members, which may affect time available for cultural practices such as harvesting.

The Project may help support the revival of commercial fishing and trapping if reduced transportation costs improve profit margins for Webequie First Nation fishers and trappers. Such a return would strengthen intergenerational knowledge transfer between Elders and youth and help sustain traditional economic practices and re-entry into non-traditional economic market. Improved access is also expected to increase visitor traffic, creating more employment opportunities in tourism, including guided hunting, trapping, and fishing. Together, these changes could enhance Webequie First Nation's socio-economic and well-being rights by expanding opportunities to maintain and grow traditional economies (Stantec Inc., 2025). However, these impacts could also contribute to impacts on food security and health-related rights with above-mentioned effects to availability of traditional foods.

The Webequie Supply Road is also anticipated to improve affordability by lowering the cost of transporting goods, which may reduce the overall cost of living and support food security through more affordable store-bought foods. Improved access to harvesting areas may further strengthen access to traditional foods. Community members already use the winter road to reach harvesting sites and nearby centres for supplies; a permanent road would enhance this access and help community members continue to rely on their land base to support individual and community wellness (Stantec Inc., 2025).

Although the adverse effects are expected to be localized and reversible and locally concentrated to the construction zone (Final EAR/IS Section 14), these effects may temporarily influence access to traditional foods, cultural continuity, and related aspects of well-being. Human Health Risk Assessment (HHRA) results indicate that Project-related contaminants in country foods are not expected to increase appreciably, and health risks from consuming these foods are not anticipated (Final EAR/IS Appendix Q).

**Construction activities → In-migration of temporary workers → Increased non-local population → Impacts to rights on social cohesion, well-being and quality of life**

**Construction activities → Increased population in the community → Increased demand for local health and wellness services → Reduced availability for community members → Impacts to the right to culturally appropriate and accessible health care**

Workers from outside the community who would be stationed temporarily for the construction phase will likely be from southern or urban areas and may hold different values related to the environment, land use, and community life. Interactions between the temporary workforce and community members, depending on their frequency and nature, could lead to a diminished sense of community, reduced social cohesion, and a loss of the close, family-like atmosphere that characterizes small First Nation communities (Final EAR/IS Section 14). Interactions between the construction workforce and the First Nation are anticipated, and depending on their nature and extent, these interactions may adversely affect community cohesion and the community's collective right to maintain social, cultural, and family integrity. Differences in values, norms, and ways of living between



community members and a non-local workforce may create tension or social conflict, which can undermine the community's ability to exercise its rights to safety, social harmony, and self-determination. Such disruptions may also erode the community's sense of belonging and "family feel," impacting communal well-being and the right to preserve culturally grounded social structures.

The temporary influx of workers into Webequie First Nation may in turn increase demand for already limited local health and wellness services. Available healthcare providers may see higher service use due to construction-related injuries, accidents, and adverse social behaviours, potentially reducing community members' access to timely care (Final EAR/IS Section 14). Increased competition for services can place financial, emotional, and logistical burdens on families, particularly vulnerable groups such as Elders (Final EAR/IS Section 14). These pressures may affect the community's ability to exercise their right to culturally appropriate and accessible healthcare. Please refer to Section 14.3.3 and Appendix Q of Final EAR/IS for further information on effects to community services and access to healthcare services respectively.

Access to appropriate social and mental health services is essential for supporting the wellness of individuals, families, and communities. For Indigenous Peoples, effective services are those that integrate culturally relevant healing practices and are delivered in safe, community-based environments. Without culturally appropriate supports, long-standing inequities in health outcomes, higher rates of substance use, youth suicide, mental health challenges, chronic pain, and interpersonal violence remain significant concerns. Many off-reserve services are provided through mainstream health systems that do not always reflect Indigenous worldviews or healing approaches. These services can be difficult to access for remote communities due to travel costs, distance, and isolation, and they often fail to address the specific cultural and historical needs of Indigenous Peoples (Final EAR/IS Section 14). When individuals must leave their community for care, they may also lose access to key social determinants of health like cultural continuity, social cohesion, and community support. This separation can worsen mental and social health outcomes and increase vulnerability to systemic factors such as racism, discrimination, and the ongoing effects of historical trauma (Final EAR/IS Section 14).

Changes in demand for community services are expected mainly during the construction phase (approximately 4–6 years), when the presence of a non-local workforce may place added pressure on already limited local services. Increased competition for healthcare may create barriers to timely care, and some community members may delay seeking treatment for conditions they perceive as minor. The temporary population near the community could also influence service needs differently across vulnerable groups.

Despite these concerns, community members, especially Elders, express hope that the WSR will ultimately improve access to medical care and make it more affordable to use these services, given that extensive or long-term care currently requires travel to larger centres such as Thunder Bay. Improved access is also expected to enhance social interaction and engagement, offering youth and Elders more opportunities for mental stimulation and emotional well-being (Stantec Inc., 2025).

The Project will include its own first aid and medical station for minor and immediate health concerns and in cases of more serious injury, workers will be transported to an appropriate medical facility likely located outside the community and the LSA, which is expected to limit strain on community health and other services. As such, overall impacts on community access to care are anticipated to be low.

**Construction activities → Increased workforce mobility, traffic, and camp activity → Higher risk to vulnerable groups (children, Elders, women, 2SLGBTQIA+ members) → Reduced community safety → Impacts to rights related to social well-being and protection**

Construction activities may increase workforce mobility, traffic, and activity at construction camps, which can heighten risks to vulnerable groups such as children, Elders, women, and 2SLGBTQIA+ community members of Webequie First Nation. The presence of a predominantly non-local, male workforce can lead to more



interactions with community members and may contribute to safety concerns, including increased risks related to adverse social behaviours. These dynamics can place additional pressure on health, police, social, and gender-based violence services, particularly affecting women and girls with low income, limited education, or addictions. Please refer to Section 14.3.3 (Change to Community Services), Section 14.3.5 (Change to Emergency and Protective Services), Section 14.3.7 (Change to Community Well-Being and Safety), and Appendix Q Sub-Section 6.2.12 (Access to healthcare Services), Sub-Section 6.2.13 (Access to Social, Mental Health and Family Services), and Sub-Section 6.2.15 (Access to Emergency Response Services) of Final EAR/IS for further information on these effects. In small communities, social capital is often reflected in practices such as sharing harvested foods with Elders or those facing food insecurity (Final EAR/IS Section 14). Disruptions to these social networks may disproportionately affect Elders, who are already vulnerable to loneliness and isolation. These are factors associated with adverse health outcomes. Elders also hold an essential role in transferring cultural knowledge, values, and traditions to younger generations. Community members have expressed interest in improving Elder involvement in social events, particularly with youth, and in expanding community services (Final EAR/IS Section 14).

Limited availability of childcare further affects access to services and participation in employment and training. Webequie First Nation operates a preschool, the Aboriginal Head Start Program, for children aged four and under but has no daycare program (Final EAR/IS Section 14). This lack of childcare disproportionately affects women, who often carry primary caregiving responsibilities. These barriers reflect broader structural impacts of colonization, including patriarchal norms that restrict Indigenous women's access to education and training (Final EAR/IS Section 14). A knowledge holder noted that improved childcare options would enable more women to pursue training opportunities, including those associated with the WSR (Final EAR/IS Section 14). Similar challenges exist with Elder care. Without an Elder care facility in the community, Elders must often leave to receive required supports when home care is no longer viable. Knowledge holders also expressed concern that social stigma and fear of judgment limit women's willingness to seek services. This hesitation is linked to intergenerational trauma from residential schools, which instilled shame and discouraged help-seeking behaviours. Knowledge holders emphasized the need for community education to normalize accessing support and reinforce that seeking help is healthy and necessary (Final EAR/IS Section 14).

In-migration of young male workers may increase interactions between the workforce and community members, with potential impacts on sexual health and increased demand for health services (Final EAR/IS Section 14). Women and girls with low income, limited education, or living with addictions may be particularly vulnerable, which could increase demand for police, sexual health services, and gender-based violence supports, including shelters. Indigenous women and girls may also be disproportionately affected by changes in community cohesion. Research shows that strong community connectedness can act as a protective factor against violence targeting women and girls (Final EAR/IS Section 14). However, assessing these impacts requires acknowledging colonial histories that have created deep and long-lasting inequalities in the social positioning and treatment of Indigenous women (Final EAR/IS Section 14). Violence-related deaths among Indigenous women are five times higher than the national average (Final EAR/IS Section 14).

Webequie First Nation currently lacks the capacity to provide gender-based violence services locally, meaning individuals may need to leave the community to seek help. Being forced to travel away from home, combined with the trauma of violence, can be retraumatizing and may contribute to worsening mental health or addictions challenges (Final EAR/IS Section 14). As demand for services rises, community members may experience reduced access to support systems essential for well-being, potentially leading to a decline in perceived and actual community safety. These impacts relate directly to rights associated with social well-being, protection, and culturally safe access to services.



The Project will include on-site first aid and medical services to manage minor health needs and reduce pressure on local healthcare; those with significant injuries will be transported to an appropriate medical facility in LSA or RSA. Community members, especially Elders, have also expressed hope that improved road access may enhance long-term access to medical care, affordability, and social connection, supporting emotional and mental well-being (Stantec Inc., 2025). Although planned mitigation measures are expected to reduce potential Project-related impacts, there remains a possibility that rights related to socio-economic, health and well-being may still be affected. Residual effects could arise from changes in access to employment, shifts in local economic conditions, altered availability of community services, or increased pressures on infrastructure. These outcomes may disproportionately affect vulnerable groups and could result in temporary or long-term reductions in overall socio-economic stability and quality of life.

**Construction activities → Increased population from outside of the community → Increased availability or exposure to substances → Heightened substance use risks → Impacts to community health and wellness rights**

Construction activities for WSR will draw in a temporary workforce from outside the community, increasing local population density and altering established social, economic, and cultural patterns. This influx can expand the availability of, or exposure to, alcohol, drugs, and other substances within the community. As substance-related risks increase, whether through greater access, peer influence, or stressors linked to rapid change, community members may face heightened vulnerability to substance misuse and related harms. These harms can impede individuals' and families' ability to maintain physical, mental, emotional, and spiritual well-being.

Community members experiencing substance-use disorders or mental health challenges may be disproportionately affected during Project operations if additional supports are not implemented to safeguard individual and community health and mental wellness. Many community members have also expressed concern that the new road may be used for "bad purposes," potentially increasing the transport of drugs and alcohol into the community and compounding existing vulnerabilities (Stantec Inc., 2025). In addition, community members have noted that the influx of workers and the availability of higher disposable income associated with the Project could lead to increased drug and alcohol use, which in turn may heighten the risk of family violence and other social harms (Final EAR/IS Section 14).

At the rights level, these impacts can undermine community health and wellness rights by, creating conditions that compromise the right to a safe and healthy environment where community members can live free from preventable health risks, straining local health and social systems reducing the community's equitable access to necessary care, supports, and culturally appropriate wellness resources, affecting collective rights to self-determination and community integrity as increased social disruption can interfere with a community's ability to maintain its preferred standards of wellness, safety, and social cohesion, and undermining culturally grounded practices and wellness pathways which are integral to many communities' rights to uphold and strengthen their cultural, familial, and community structures.

**Operations and maintenance activities → Environmental disturbance and contamination risk → Changes to availability, quality, or perceived safety of traditional foods → Decreased reliance on land-based nutrition → Impacts to food security and health-related rights**

Operations activities may impact the environmental conditions and habitats of traditionally harvested foods through vegetation management, road maintenance, traffic, dust, noise and periodic blasting at supportive infrastructure. Accidents and spills may also take place during the handling and application of road maintenance supplies. These effects may influence the availability, quality or perceived safety of traditional foods, if they are not immediately resolved. Potential changes or perceived changes to traditional foods may decrease reliance on land-based sources which would decrease food security and health-related rights.



The benefit of using the WSR once operational depends on the completion of the connecting road projects, the Marten Falls Community Access Road and the Northern Road Link which would provide access to the provincial highway network. Community members' employment income is also expected to increase due to access to mineral developments in the Ring of Fire, which may be spent on store-bought foods that improves food security. However, for those without access to employment, they may not see the same benefits.

Focus group participants also noted that a permanent road could increase disturbances to the land, potentially affecting wildlife movement and the availability of traditional foods, which make up a substantial portion of some households' diets (Final EAR/IS Appendix Q). Noise-related effects during operations are expected to be limited and localized, and the overall impacts on harvesting practices and food security are uncertain but likely small.

The road may also improve access to the land, as more areas become reachable by vehicle, ATV, or snowmobile. This could enable more community members to access hunting, fishing, and gathering grounds, potentially increasing access to traditional foods and supporting improved health outcomes.

**Operations and maintenance activities → In-migration of temporary workers → Increased non-local population → Impacts to rights on social cohesion, well-being and quality of life**

**Operations and maintenance activities → Increased population in the community → Increased demand for local health and wellness services → Reduced availability for community members → Impacts to the right to culturally appropriate and accessible health care**

Operations and maintenance activities will involve only a small number of temporary workers in the community. As a result, any population changes will be minimal and short-term, reducing potential impacts on social dynamics and on community rights related to social cohesion, well-being, and quality of life. Because workers will not be settling in the community, no meaningful increase in demand for local health and wellness services is anticipated, and the Project is not expected to affect community members' access to culturally appropriate or timely health care. Overall, impacts to the community's right to accessible, culturally aligned health services are considered low.

However, community members have expressed concerns about potential indirect social impacts associated with economic participation in the Project. Some Webequie First Nation members are worried that increased disposable income from Project-related employment could contribute to higher rates of drug and alcohol use, which may elevate the risk of family violence (Final EAR/IS Section 14). Additionally, Indigenous men working within non-Indigenous-dominated Project settings may experience racism or discrimination from coworkers. Such experiences can negatively affect mental health and may contribute to stress or conflict upon returning home, potentially heightening risks of family violence (Final EAR/IS Section 14). Community members also noted that women, youth, and Elders without financial independence may be more vulnerable to abuse and family violence, as limited resources can reduce their ability to leave unsafe situations (Final EAR/IS Section 14). These concerns reflect broader potential impacts to community rights to safety, security, and overall well-being.

Similar to the construction phase, these shifts have the potential to alter the family-like atmosphere of the community and influence community cohesion, which is an important aspect of the community's collective right to maintain social integrity and cultural continuity. Once WSR is operational and connects Webequie First Nation to Ring of Fire, community members have noted the possibility of increased visitors, particularly individuals linked to mineral development activities, who may use local services and infrastructure. This increased presence could place pressure on community resources and affect the community's ability to exercise its rights to safety, well-being, and control over its social environment.

Community members also emphasized that the effects of reduced cohesion will not be evenly experienced. Youth, Indigenous women, and Indigenous girls may face disproportionate impacts, reflecting ongoing



vulnerabilities tied to inequitable socio-economic conditions (Final EAR/IS Section 14). These unequal effects cannot be fully understood without recognizing the broader colonial history that has produced persistent disparities in social status, treatment, and access to opportunities. This historical context continues to shape the conditions under which Indigenous women, girls, and youth experience changes in community cohesion, socio-economic security, and their overall well-being (Final EAR/IS Section 14).

WSR has the potential to generate positive socio-economic and well-being impacts for Webequie First Nation, particularly through employment opportunities during construction and operations if community-first hiring agreements are in place. These benefits may be experienced more by able-bodied men if gender disparities in hiring or wages occur, while youth are expected to benefit significantly from increased job opportunities and the chance to develop transferable skills, potentially supporting future work in the mining sector or small business development (Stantec Inc., 2025). Improved access provided by the road would also support the transport of materials needed for new community infrastructure, including facilities valued by Elders such as care homes (Stantec Inc., 2025). These improvements would benefit the whole community. Elders living in Thunder Bay for medical reasons noted that the road would make returning home more affordable and frequent, strengthening family connections and time on the land, which are important to their cultural and social well-being (Stantec Inc., 2025). The Project is expected to provide safer travel conditions than the existing winter road, as it will not depend on cold temperatures and can better accommodate transport trucks. However, community members may still face risks while travelling due to long distances between gas stations and checkpoints. Community members also raised concerns that youth may attempt to leave the community using the road, noting a recent incident where a group of youth became stranded on the winter road (Stantec Inc., 2025).

During operations, the Project may enhance access to culturally appropriate health care, both clinical and traditional, by supporting more frequent visits from doctors, nurses, and other specialists such as dentists and optometrists, as well as traditional healers and midwives (Stantec Inc., 2025). The road may also improve access to areas where community members harvest medicinal plants, as it intersects with several valued habitats and species identified through community input (Stantec Inc., 2025). If the road contributes to improved housing for Elders and Knowledge Holders, or enables them to return home more often, it may also indirectly strengthen Webequie First Nation's right to well-being by creating more opportunities for intergenerational knowledge transfer and traditional teaching (Stantec Inc., 2025).

**Operations and maintenance activities → Increased workforce mobility, traffic, and camp activity → Higher risk to vulnerable groups (children, Elders, women, 2SLGBTQIA+ members) → Reduced community safety → Impacts to rights related to social well-being and protection**

Operations and maintenance activities may increase workforce mobility, traffic, and activity around work camps, which can heighten risks for vulnerable groups, including children, Elders, women, and 2SLGBTQIA+ members. Even modest increases in non-local movement can contribute to reduced perceptions of safety and greater exposure to unsafe interactions.

These conditions may undermine community rights to safety, security, and social well-being by affecting individuals' ability to move freely without fear, participate fully in community life, and feel protected within their own territory. Disruptions to the community's sense of safety can also affect collective rights to maintain social cohesion.

However, these impacts are expected to be limited, as the number of full-time equivalent positions during operations is low, and several of these roles can be filled by Webequie First Nation community members. This reduces the scale of non-local workforce presence and helps maintain community control over who is involved in day-to-day operations, thereby lowering potential risks to social well-being and rights to protection.



**Operations and maintenance activities → Increased population from outside of the community → Increased availability or exposure to substances → Heightened substance use risks → Impacts to community health and wellness rights**

Operations and maintenance activities may bring a small number of non-local workers into the area, increasing the presence of people from outside the community. Even limited population changes can elevate the availability of, or exposure to, alcohol, drugs, or other substances. Community members voiced specific concerns that the road could be used for the “wrong purposes,” including the transportation of drugs into the community, which could increase both availability and use of substances among community members (Stantec Inc., 2025).

These heightened exposure risks may disproportionately affect individuals already facing vulnerabilities and contribute to substance-related harms. Such conditions can undermine community health and wellness rights by impacting physical, mental, emotional, and spiritual well-being, and by placing added strain on supports intended to maintain safe, healthy, and culturally grounded living environments.

### **6.3.1.2 Other LSA and RSA Communities**

**Construction activities → Environmental disturbance and contamination risk → Changes to availability, quality, or perceived safety of traditional foods → Decreased reliance on land-based nutrition → Impacts to food security and health-related rights**

**Construction activities → In-migration of temporary workers → Increased non-local population → Impacts to rights on social cohesion, well-being and quality of life**

**Construction activities → Increased population in the community → Increased demand for local health and wellness services → Reduced availability for community members → Impacts to the right to culturally appropriate and accessible health care**

**Construction activities → Increased workforce mobility, traffic, and camp activity → Higher risk to vulnerable groups (children, Elders, women, 2SLGBTQIA+ members) → Reduced community safety → Impacts to rights related to social well-being and protection**

**Construction activities → Increased population from outside of the community → Increased availability or exposure to substances → Heightened substance use risks → Impacts to community health and wellness rights**

**Operations and maintenance activities → Environmental disturbance and contamination risk → Changes to availability, quality, or perceived safety of traditional foods → Decreased reliance on land-based nutrition → Impacts to food security and health-related rights**

**Operations and maintenance activities → In-migration of temporary workers → Increased non-local population → Impacts to rights on social cohesion, well-being and quality of life**

**Operations and maintenance activities → Increased population in the community → Increased demand for local health and wellness services → Reduced availability for community members → Impacts to the right to culturally appropriate and accessible health care**

**Operations and maintenance activities → Increased workforce mobility, traffic, and camp activity → Higher risk to vulnerable groups (children, Elders, women, 2SLGBTQIA+ members) → Reduced community safety → Impacts to rights related to social well-being and protection**



**Operations and maintenance activities → Increased population from outside of the community → Increased availability or exposure to substances → Heightened substance use risks → Impacts to community health and wellness rights**

Other LSA and RSA communities identified concerns that describe potential pathways through which Project-related changes may interact with the exercise of Aboriginal and Treaty Rights, including rights related to health, food security, cultural continuity, land use, governance, and social well-being. Based on the information provided by communities, the Project Team interprets that these issues may represent potential impacts on the meaningful exercise of rights.

Construction and operations activities may potentially contribute to environmental disturbance and contamination risks, reducing the availability, quality, or perceived safety of traditional foods and affecting food security and health-related rights. These activities will bring an influx of temporary workers, increase the non-local population and influence social cohesion, community well-being, and quality of life. Population growth driven by Project-related workers can possibly heighten demand for local health and wellness services, reducing access for community members and impacting their right to culturally appropriate care. Increased workforce mobility, traffic, and camp activity may elevate safety risks for vulnerable groups, affecting rights related to social protection and well-being. Additionally, a rise in non-local populations may potentially increase exposure to substances, heightening substance use risks and further impact community health and wellness rights.

Attawapiskat First Nation has conveyed its concern that government actions are progressively eroding the community's ability to exercise its inherent rights. Attawapiskat First Nation has also highlighted significant social challenges, including inadequate living conditions, homelessness, and the presence of contaminated drinking water (ATRI Forum, February 2023).

Fort Albany First Nation's IKLRU study participants expressed that the Proposed Roads may contribute to a loss of connection to the land and diminish the ability of Fort Albany First Nation members to pass cultural knowledge to younger generations. They noted that these cultural practices and ways of life are already strained by existing social issues within the community. Although efforts are being made to teach children about their cultural identity, these teachings rely heavily on maintaining a strong connection to the land. The participant emphasized that current living conditions within the community, including ongoing social challenges, are undermining this connection and are contributing to an overall situation that remains deeply concerning (Firelight Research Inc. with Fort Albany First Nation, 2024). Members of the Fort Albany First Nation expressed concerns about the increasing influence and entrenchment of settler society within their territory. One participant characterized the Project as a form of globalization and an additional encroachment into what they viewed as the community's remaining space for the protection of Indigenous culture and heritage. They fear that developments could accelerate assimilation pressures on community members. Another participant emphasized that the Project could significantly disrupt cultural practices, daily life, and community cohesion. They noted particular concern about the potential influx of outside individuals and illicit substances, explaining that similar issues are already emerging with the existing southern route and winter road. Increased access, they cautioned, could exacerbate current social challenges and introduce new risks, underscoring the need for careful consideration of the road's broader social impacts (Firelight Research Inc. with Fort Albany First Nation, 2024). IKLRU study participants anticipate that the Project and other road projects would further affect the community by increasing exposure to settler populations and cultural influences. They expressed concern that this shift could intensify existing social issues and contribute to new challenges within the community. Participants also noted that expanded access to the region may alter or limit traditional land use, which could, in turn, impact cultural identity, land-based practices, and overall community well-being (Firelight Research Inc. with Fort Albany First Nation, 2024).

Kashechewan First Nation has expressed that access to traditional foods that remain free from contamination and development pressures is essential to meaningfully exercise their harvesting rights and sustain their cultural way of life. Harvesting provides community members with reliable access to fresh, healthy foods throughout the



year. This stands in contrast to the high cost of store-bought groceries, which must be transported long distances and are often unaffordable. The high cost of retail food is a major contributor to food insecurity for Kashechewan First Nation. Harvesting helps address this challenge by offering an accessible food source while also supporting overall well-being through cultural continuity, connection to traditional practices, and stewardship of the land (Kashechewan First Nation with MNP LLP, N.D.). Kashechewan First Nation continues to face significant systemic and socio-economic barriers, including the rising cost of living, which directly affects individuals' ability to exercise their fundamental rights to health and food security. With living expenses remaining high and inflation intensifying financial pressures, many community members rely on accessing and harvesting resources from the land as a means of meeting their basic needs and maintaining cultural practices. Despite these efforts, limited access to affordable, nutritious, and culturally appropriate food has contributed to a growing health concern. Increasing rates of diet-related illnesses, including diabetes, reflect broader inequities that undermine community members' rights to adequate nutrition, culturally relevant food systems, health, and overall well-being (Kashechewan First Nation with MNP LLP, N.D.).

Community members who took part in the Marten Falls First Nation IKLRU study expressed that the proposed WSR and Northern Road Link (NRL) have the potential to create meaningful work and employment opportunities for First Nations, leading to positive impacts for Marten Falls First Nation members. They noted that there has long been a dependence on government funding, and even the jobs that existed were often tied to government programs, which limited the opportunities available. Participants emphasized that this challenge continues today. They highlighted the need to shift away from reliance on government funding and to support communities in becoming self-sustaining. This pursuit of independence is a driving force behind current efforts to advance development in the Ring of Fire. Participants explained that achieving this independence, particularly if a mine were to be developed, would help Marten Falls First Nation break away from government dependency and move toward greater economic self-determination. Community members anticipate that the proposed roads will create year-round employment opportunities, including roles in road maintenance. They also hope that community members will receive training to become truck drivers and heavy equipment operators (Suslop Inc with Marten Falls First Nation, 2024). Marten Falls First Nation community members are concerned that the proposed roads will increase access to the region for outsiders, potentially disrupting their way of life and creating interpersonal conflicts. Many fear that an influx of new people could negatively affect community well-being. A major concern is the increased flow of legal and illegal substances. Community members believe that improved access will make it easier for alcohol and drugs to enter the community and for outsiders to come in to sell them. They worry this will lead to higher substance use, creating health and safety risks. Community members also noted that increased drug use can limit participation in cultural and land-based activities. Some explained that addictions already prevent people from going out on the land, which marks a change from how they grew up (Suslop Inc with Marten Falls First Nation, 2024). Marten Falls First Nation community members also identified several health and safety risks related to Project and other proposed roads. They are particularly concerned about unsafe driving conditions, including sharing the roads with large industrial trucks, which they believe increases the likelihood of accidents. Some also raised concerns about impaired driving, though others felt these incidents would be infrequent. Community members questioned the safety of building roads across peatlands, noting that muskeg may not support heavy equipment. They also pointed out that gravel roads are difficult to maintain and can easily wash out, creating ongoing hazards. Increased traffic is also seen as a wildfire risk, as construction crews or travellers may discard cigarettes along the roadside. Community members further worry about unknowledgeable travellers entering the region, as the land and waterways require local knowledge to navigate safely. Finally, some community members expressed concern that improved road access could increase vulnerability to human trafficking in the region. They believe that increased mobility and easier road access could make the region more vulnerable to trafficking activity, as similar incidents have occurred elsewhere and could become more prevalent with new transportation routes (Suslop Inc with Marten Falls First Nation, 2024).



Weenusk First Nation IKLRU study stated that overall, current conditions support the availability of high-quality resources in their traditional areas, allowing Weenuski Inninowuk to sustain their harvesting activities and cultural practices. These conditions also contribute to the community's health and well-being. However, participants noted that incremental changes over time highlight the importance of strong Weenusk First Nation governance, working in partnership with neighbouring communities, to maintain an intact and healthy environment (Weenusk First Nation with MNP LLP, N.D). Due to the remote nature of Peawanuck and Weenuski Inninowuk, community health is closely tied to an intact environment and the availability of high-quality, traditionally harvested foods. Participants emphasized that access to country foods is essential for Weenuski Inninowuk well-being, particularly given the high rates of diabetes in the community and the fact that harvested foods are free from sugars and additives found in store-bought alternatives. The Winisk River and surrounding peatlands were identified as especially important features of Weenusk First Nation's traditional areas. These ecosystems support the wildlife and vegetation that form the foundation of Weenuski Inninowuk health, diet, and cultural practices (Weenusk First Nation with MNP LLP, N.D). Because water is closely connected to the surrounding wildlife and vegetation, participants emphasized that water quality and quantity are essential for community health. While Weenusk First Nation's traditional areas are generally viewed as pristine, some participants have observed changes over time, including murkier water, shifting river conditions, and increasingly shallow or unpredictable channels. Participants also raised concerns about rising mercury levels in certain harvested fish species and the risk that migratory animals exposed to contaminants in the south may introduce those contaminants into Weenusk First Nation's food chain. This creates potential health risks for Weenuski Inninowuk harvesters who rely on these foods. For community health, participants were especially concerned about future contamination of water in Weenusk First Nation's traditional areas resulting from foreseeable development. Although the Ring of Fire is located further south than where most participants harvest, they stated that no distance would be safe from potential downstream contamination and that Weenuski Inninowuk would still experience the impacts of any water pollution from future development (Weenusk First Nation with MNP LLP, N.D). Weenusk First Nation has a small nursing station that provides basic primary care services such as counselling and immunizations. However, when community members require specialized treatment or more advanced medical care, the nearest services are in Timmins. As Weenusk (Peawanuck) First Nation is a fly-in community, travel for medical appointments is costly and can be a significant barrier to receiving timely and appropriate care. These conditions negatively affect the community's economic and environmental well-being, as well as overall health. Given these limitations, participants emphasized the importance of maintaining access to safe, uncontaminated resources from the land. This includes a strong reliance on traditionally harvested medicines, which continue to play an essential role in supporting community health (Weenusk First Nation with MNP LLP, N.D). Some Weenusk First Nation IKLRU study participants noted potential benefits of an all-season road, particularly improved access to goods and services that are currently limited or costly. At present, Weenusk (Peawanuck) First Nation relies on a winter road constructed from Fort Severn, which provides most of the community's supplies. Participants explained that building this winter road requires significant effort, and climate change has reduced the duration of reliable freeze-up, shortening the period in which the road can be safely used. At the same time, participants expressed strong concerns about road safety on an all-season route and the potential impacts on community well-being. Many community members do not hold driver's licenses and primarily travel using recreational vehicles. Without adequate training on road safety and motor-vehicle operation, participants worry that increased traffic and unfamiliar driving conditions could place community members at greater risk of accidents (Weenusk First Nation with MNP LLP, N.D).

Across the other LSA and RSA First Nation communities, the information available indicates concerns about how Project-related changes may affect the socio-economic and health conditions necessary for the meaningful exercise of Aboriginal and Treaty Rights. Potential pathways have been identified through which environmental disturbance, contamination risks, increased in-migration of non-local populations, pressures on local health and wellness services, heightened safety risks to vulnerable groups, and increased exposure to substances may influence food security, social cohesion, community well-being, and access to culturally appropriate care. Even



where information is limited, these pathways suggest that Project activities may alter the conditions required to maintain land-based nutrition, community health, personal and collective safety, and equitable socio-economic opportunities, all of which form an essential foundation for socio-economic, health, and well-being rights. These concerns outline ways in which the Project may interact with the ability of Indigenous communities to exercise Aboriginal and Treaty Rights tied to health, food security, social well-being, and culturally grounded socio-economic conditions.

## 6.3.2 Summary of Net Effects

**Table 6-3** below is a summary of conclusions made for each of the identified potential impacts on Rights associated with Socio-Economic, Health and Well-Being. Please refer to **Section 5.1.4** for detailed information on net effects characterization methods.

**Table 6-3 Summary and Conclusion of Potential Impacts on Aboriginal and Treaty Rights**

Potential Impacts	Study Area	Potential for Occurrence	Carry forward in Assessment?
Rights associated with Socio-Economic, Health and Well-Being	LSA: Webequie	Moderate	Yes
	LSA: Other communities	Low	Yes
	RSA	Low	Yes

Note: This characterization is based on the input received from “Webequie First Nation Indigenous and Treaty Rights Impact Assessment for the Webequie Supply Road” and the Project’s team interpretation of the rights impact assessment and is subject to validation from the community (Stantec Inc., 2025)

## 6.3.3 Severity Characterization

Please refer to **Section 5.1.5** for detailed information on net effects characterization methods.

### 6.3.3.1 Webequie First Nation

Impacts to Webequie First Nation socio-economic and well-being rights during both construction and operations have been characterized as follows (Stantec Inc., 2025):

- Likelihood: High
- Direction: Adverse and Positive
- Geographic Extent: Moderate
- Frequency: Multiple irregular event
- Duration and Reversibility: High
- Equity: Moderate
- Cultural Well-being: Low to moderate
- Governance: Low
- Health: Low

Effects on socio-economic and well-being rights are assessed as having a high likelihood of occurring, with both adverse and positive outcomes anticipated. While the Project is expected to generate employment and income that will benefit Webequie First Nation, these benefits may also create inequities and contribute to social challenges within the community. Reduced air quality may negatively affect the health of individual Webequie

First Nation members, and changes in the availability of traditional foods could diminish community well-being. Webequie First Nation could also experience adverse effects if lack of capacity prevents their full participation in the economic benefits generated by the Project (Stantec Inc., 2025).

The Project is also predicted to have positive impacts on Webequie First Nation socio-economic and well-being rights by creating employment, contracting opportunities, and increased household income. The Project may also stimulate the revitalization of commercial outfitting and expand opportunities for Webequie community members to work as hunting and fishing guides. Improved access associated with the Project is expected to enhance health care in the Webequie First Nation community and lower the cost of living by improving the availability of goods and supporting upgrades to community infrastructure (Stantec Inc., 2025).

The geographic extent of impacts are predicted to be moderate, as both adverse and positive effects will primarily be experienced by Webequie First Nation members living or working within the LSA. Frequency of impacts are expected to occur across multiple irregular events throughout all phases of the Project. As the Project is expected to operate permanently and has no plans for decommissioning, the duration and reversibility of impacts are considered high. Equity impacts during construction are also predicted to be moderate, as some members may more readily benefit from employment or contracting opportunities, if hiring favours men or if wage disparities occur. Community well-being impacts may also be experienced unevenly, particularly among those who rely more heavily on traditional foods or who are more directly exposed to Project-related sensory disturbance (Stantec Inc., 2025).

Cultural well-being impacts associated with socio-economic and well-being rights are expected to range from low to moderate during construction and operations. While Webequie First Nation members are expected to experience both adverse impacts (e.g., income inequities, reduced access to traditional foods) and positive impacts (e.g., increased income, improved health care), economic benefits may not be equally distributed across the community. Potential adverse impacts on governance are predicted to be low as Webequie First Nation is the proponent, the Project is expected to be constructed and operated in accordance with Webequie First Nation laws, customs, and governance structures. The community should have opportunities to participate in economic benefits (Stantec Inc., 2025).

Adverse health-related impacts on socio-economic and well-being rights are also predicted to be low. Project-related environmental exposures are expected to remain below Health Canada's target benchmarks, although a reduction in the availability of traditional foods may affect individual well-being. The Project is also acknowledged to have positive effects on community health and well-being (Stantec Inc., 2025).

### **6.3.3.2 Other LSA and RSA Communities**

This section assesses the extent to which the Project may affect Aboriginal and Treaty Rights associated with socio-economic, health, and well-being. Information provided by other LSA and RSA Indigenous communities indicates concerns about how the Project may affect key conditions that support the meaningful exercise of Aboriginal and Treaty Rights. Communities have described potential impacts related to health, food security, cultural continuity, and social well-being, including reduced availability of traditional foods, heightened safety risks, increased exposure to non-local populations, and pressures on community health systems. Several communities also noted that disruptions to land access, harvesting areas, culturally significant places, and traditional travel routes could weaken connections to the land, limit opportunities for cultural practice, and constrain intergenerational knowledge transmission. Others highlighted cumulative social and environmental pressures, including contamination risks, and changing wildlife patterns which may intensify existing challenges. The identified pathways in Section 6.3.1 suggest that Project-related changes could potentially impact socio-economic, health and well-being rights across LSA and RSA communities.



It is anticipated the other LSA and RSA communities will experience **Low** level of severity of Project-related impacts on Indigenous rights associated with socio-economic conditions, health, and well-being. This assessment reflects the understanding of how the Project may influence social systems and health determinants of Indigenous communities, and is based on the information provided to the Project Team to-date, with consideration of proposed mitigation and enhancement measures, and it reflects current predictions made with information available.

## 6.4 Self-Determination and Self-Governance

### 6.4.1 Pathways of Effect

#### 6.4.1.1 Webequie First Nation

**Construction activities → Reduced ability to influence decisions affecting lands, resources, and community well-being → Impacts to right for self-determination and self-governance**

During the construction stage, Project activities may intensify decision-making demands on Webequie First Nation, while also rapidly altering the landscape. If Webequie First Nation is not meaningfully involved in construction-related decisions, such as work sequencing, access management, timing windows, or mitigation placement, their ability to influence outcomes is significantly reduced. This can lead to real-time effects on the community's culturally important areas, harvesting sites, community travel routes, and local environmental conditions. Construction-phase decisions are often made quickly to meet schedule requirements. When these decisions bypass or limit community participation due to tight timelines, incomplete information sharing, or insufficient capacity support, communities experience a reduced ability to assert their governance systems and exercise oversight over their lands. This directly affects their ability to enact their stewardship principles, protect valued areas, or guide construction practices consistent with their cultural and environmental priorities.

The diminished influence during construction can contribute to: reduced ability to apply IK to guide mitigation or site-specific environmental protection, limited opportunity to adjust construction timing to avoid potential effects on hunting, fishing, harvesting, or ceremonial activities, a sense of loss of control as land disturbance proceeds faster than community input can be integrated, and strain on community governance systems as leadership attempts to respond to rapid decisions with inadequate support or information.

These effects collectively undermine the community's right to self-determination and self-governance, which relies on meaningful participation in decisions affecting territories, cultural continuity, and community well-being.

The Project is also anticipated to generate positive effects on Webequie First Nation's rights related to their customs, protocols, and laws. As the proponent, Webequie First Nation holds a central role in all major decisions associated with the Project. By leading the regulatory application, Webequie First Nation is actively involved in the Project's design, impact assessment, and approval processes. This leadership position strengthens Webequie First Nation's ability to guide Project planning, mitigation, and long-term management so that these processes reflect their governance systems, cultural protocols, and community values. Through this role, the Project provides an opportunity for Webequie First Nation to exercise decision-making authority in a manner aligned with their priorities and to advance approaches consistent with their Indigenous laws and customs (Stantec Inc., 2025).



**Construction activities → Project footprint conflicting with Indigenous-developed land-use plans or stewardship priorities → Reduced ability to implement community plans → Impacts to the Nation’s strategic decision-making authority and right for self-determination and self-governance**

During the construction phase, the Project footprint is estimated to intersect with areas identified in Webequie First Nation’s draft Community Based Land Use Plan (CBLUP), CCP, community visions, and stewardship priorities. These overlaps can occur through vegetation clearing, site grading, access road construction, placement of temporary facilities, or increased human presence on the landscape and other disturbances which will be created during this phase. If construction activities limit access to preferred land use areas or alter landscapes that hold cultural, harvesting, or stewardship value, this may constrain Webequie First Nation’s ability to implement its long-term land use plans such as CBLUP and CCP. Such disruptions can reduce the effectiveness of stewardship programs and hinder Webequie First Nation’s ability to protect or manage lands in accordance with their own values, protocols, and decision-making systems.

The inability to implement these plans may also diminish Webequie First Nation’s strategic control over its lands and resources, potentially undermining Indigenous jurisdiction and the exercise of self-governance. Conflicts between community-led planning and Project-driven land disturbance can weaken Webequie First Nation’s authority to determine how its land base is used, conserved, or restored, thereby affecting their inherent right to self-determination.

Reduced ability to apply or enforce Indigenous land use plans during construction may result in temporary or long-term misalignment between Project activities and community priorities, loss or degradation of culturally significant spaces identified for specific stewardship purposes, displacement of planned land uses, harvesting, or cultural practices and erosion of Indigenous governance authority where Project needs override community-led planning. Overall, construction-related encroachments on Indigenous land use priorities may create significant challenges for Webequie First Nation’s strategic planning processes and governance objectives.

**Operations and maintenance activities → Reduced ability to influence decisions affecting lands, resources, and community well-being → Impacts to right for self-determination and self-governance**

In the operations phase, effects to decision-making influence may become long-term and institutionalized. If Webequie First Nation is not fully involved in decisions about ongoing land access, maintenance activities, emergency response planning, or environmental monitoring, their ability to shape land stewardship outcomes is reduced. This can constrain self-governance over extended periods, potentially for the life of the Project. Operational decisions including vegetation management, access controls, safety protocols, or monitoring program design may affect how Webequie First Nation uses and interacts with the lands. When these processes do not meaningfully incorporate Indigenous governance systems or Indigenous-led environmental knowledge, Webequie First Nation may potentially face ongoing limitations in managing resources within the traditional territories.

Community members expressed concerns that the Project may interfere with trapping activities. A Knowledge Holder reported receiving correspondence from the provincial government advising that their trapline tenure was no longer valid due to the proposed road crossing the trapline. Some of the other concerns are about potential impacts on hunting from roadway allowances, noting these would conflict with the Webequie First Nation draft CBLUP. Community members also raised worries about increased enforcement of Indigenous hunting and harvesting by provincial conservation officers, and that requirements such as moose tags could undermine the draft CBLUP objectives and family responsibilities to steward wildlife. Community informants further noted that an influx of non-Indigenous land users in the LSA and RSA may affect Webequie First Nation’s ability to manage lands and resources according to their own laws, teachings, and values. Community members emphasized that all individuals entering their traditional territory must respect Indigenous and Treaty Rights and follow Webequie First Nation’s laws and harvesting practices (Stantec Inc, 2025).



The reduced ability to influence decisions during operation can result in: long-term constraints on land use, including access restrictions or altered patterns of harvesting and cultural use; limited participation in monitoring programs, reducing the application of IK in identifying cumulative effects or changes to valued ecosystems; ongoing dependence on external decision-makers to address concerns or authorize land-use changes; and a perception that Project-related land management overrides Indigenous authority or stewardship principles. These sustained limitations can erode the Webequie First Nation's right to self-determination, as these impede the ability to guide long-term land management consistent with cultural, spiritual, and socio-economic priorities. The cumulative nature of these constraints may also weaken governance capacity over time, particularly if WSR remains in operation for decades (as is currently planned).

**Operations and maintenance activities → Project footprint conflicting with Indigenous-developed land-use plans or stewardship priorities → Reduced ability to implement community plans → Impacts to the Nation's strategic decision-making authority and right for self-determination and self-governance**

During operations, the long-term presence of Project infrastructure and activities such as facilities, noise, ongoing land access restrictions, and changes to wildlife movement may continue to conflict with Webequie Nation's land use plans or stewardship commitments. These impacts can be chronic, cumulative, and may affect large areas over the full operational life of the Project.

Conflicts in the operations phase can impede Webequie First Nation's ability to carry out planned land-based programs, including cultural revitalization initiatives, environmental monitoring, habitat restoration, climate adaptation, and protection of cultural or ecological values. If operational requirements restrict access or fundamentally alter landscape conditions, Webequie First Nation may be unable to advance its long-term land vision as outlined in its community-driven plans.

Continued limitations on Indigenous planning may undermine Webequie First Nation's ability to exercise full decision-making authority over their traditional territory. The presence of infrastructure and regulated operational buffers can effectively shift land use authority toward industry or regulatory structures, reducing space for Indigenous governance systems to function as intended.

During operation, ongoing conflict with Indigenous plans may contribute to long-term barriers to implementing community stewardship and conservation goals, reduced land availability for cultural, harvesting, or land-based programs, fragmentation of areas identified by Webequie First Nation for future development, community use, or protection, and erosion of Indigenous jurisdiction and long-term control over strategic land-use decisions.

Over time, these effects may impair Webequie First Nation's ability to pursue its own governance priorities and exercise its right to self-determination in land management.

#### **6.4.1.2 Other LSA and RSA Communities**

**Construction activities → Reduced ability to influence decisions affecting lands, resources, and community well-being → Impacts to right for self-determination and self-governance**

**Construction activities → Project footprint conflicting with Indigenous developed land use plans or stewardship priorities → Reduced ability to implement community plans → Impacts to the Nation's strategic decision-making authority and right for self-determination and self-governance**

**Operations and maintenance activities → Reduced ability to influence decisions affecting lands, resources, and community well-being → Impacts to right for self-determination and self-governance**



**Operations and maintenance activities → Project footprint conflicting with Indigenous developed land use plans or stewardship priorities → Reduced ability to implement community plans → Impacts to the Nation’s strategic decision-making authority and right for self-determination and self-governance**

The information received from the other LSA and RSA communities reflects potential pathways through which the Project may interact with rights related to self-determination and self-governance. The Webequie Project Team interprets this feedback as indicating potential impacts on the meaningful exercise of Aboriginal and Treaty Rights. Construction, operations, and maintenance activities may possibly reduce the ability of Indigenous Nations to influence decisions affecting their lands, resources, and community well-being, resulting in impacts to their inherent rights of self-determination and self-governance. These activities may also conflict with Indigenous-developed land use plans or stewardship priorities, limiting the ability of communities to implement their plans and ultimately affecting the community’s strategic decision-making authority and rights to self-determination and self-governance.

The ability to care for and manage the environment within Weenusk First Nation’s traditional areas is noted to be inseparable from the identity, well-being, and inherent rights of Weenuski Inninowuk. Environmental stewardship is not only a cultural responsibility but also an expression of Indigenous rights recognized under Section 35 of the *Constitution Act, 1982* and affirmed through Treaty 9. By exercising stewardship over their lands and waters, Weenuski Inninowuk uphold their responsibilities to maintain the health of culturally significant resources for the benefit of the community and future generations (Weenusk First Nation with MNP LLP, N.D). These stewardship responsibilities are directly connected to the Nation’s inherent rights of self-determination and self-governance, as they reflect community-driven authority over land, resources, and cultural continuity.

Weenusk First Nation IKLRU study participants emphasized that living off the land and maintaining strong connections to the land are central to Weenuski Inninowuk identity. Supporting relationships with the lands and waters in Weenusk First Nation’s traditional areas, along with the cultural practices tied to them, contributes to healing and overall well-being. Members explained that, in the context of colonialism and the impacts of residential schools, reconnecting with the land has been essential for rebuilding identity and restoring a sense of balance. Spending time on the land is viewed as a source of personal healing and an important part of daily life for many. Participants also noted that Weenusk First Nation histories, stories, and cultural knowledge are deeply rooted in the land, waters, and physical landscapes across their traditional territory (Weenusk First Nation with MNP LLP, N.D).

Weenusk First Nation IKLRU study participants emphasized that community input and consensus are essential to First Nation decision-making. Weenusk First Nation’s traditional areas consist of different families’ ancestral lands, which are not “owned” individually but are held collectively within the Weenusk First Nation. Due to this structure, both community-wide and family-level consent are central to all major decisions (Weenusk First Nation with MNP LLP, N.D). This collective decision-making process reflects inherent governance practices and underscores that authority flows from the community, reinforcing Weenusk First Nation’s rights to self-governance.

Stewardship of the environment is closely tied to Weenusk First Nation’s governance. Any changes to stewardship practices or limitations on Weenusk First Nation’s ability to steward the land in preferred ways directly affect their authority over the environment and natural resources within their traditional territory. Effects to these resources can create downstream impacts that reduce Weenusk First Nation’s ability to care for the land according to their laws, values, and traditions (Weenusk First Nation with MNP LLP, N.D). Such changes directly intersect with the Nation’s rights of self-determination, jurisdiction, and environmental governance.

Participants emphasized that while other communities have the right to manage resources within their own traditional areas, the impacts of those activities on Weenusk First Nation’s rights and territory must be considered. Developments upstream or nearby that could potentially effect water flow or water quality can have



direct repercussions for Weenusk First Nation traditional areas downstream. Participants explained that First Nation communities have requested that developments not contaminate their lands, watersheds, or wildlife, and that they simply want to live in peace on their territory. Weenusk First Nation raised concerns that if contamination does occur as a result of development activities, responsibility for cleanup and long-term impacts must be addressed (Weenusk First Nation with MNP LLP, N.D). These concerns highlight potential impacts to Weenusk First Nation rights related to stewardship authority, land management, and self-governance.

Weenusk First Nation IKLRU study participants emphasized that protecting the environment is essential for maintaining their way of life. They expressed concerns that altered flow patterns and potential downstream contamination associated with the Project or future development could undermine their ability to live off the land and safeguard resources for future generations. Participants explained that leadership plays an important role, but decision-making begins with the membership. Community members discuss the issues, determine their collective position, and communicate this to leadership. Leaders then act as the voice of the community, carrying forward the decisions made by the membership rather than making decisions independently (Weenusk First Nation with MNP LLP, N.D). This governance structure reflects Weenusk First Nation's inherent right to self-determination and community-driven decision-making, and any limitations on these processes may affect the meaningful exercise of governance rights.

Attawapiskat First Nation had provided feedback outlining their concerns with the EA process during Consultation Round 1, where they requested that Regional Assessment be completed first, explaining that this approach would enable a thorough cumulative effects assessment to better understand the overall impacts of opening the Ring of Fire to all-season road access. Attawapiskat First Nation's (now former) Chief, David Nakogee, emphasized the need to review draft EA documents before they are submitted to regulators, allowing the community to incorporate their Indigenous Knowledge and include information about potential impacts to their rights directly within the EA. These concerns relate directly to Attawapiskat First Nation's rights of self-determination and self-governance, as they reflect Attawapiskat First Nation's request to direct how assessment processes unfold, to participate meaningfully in decision-making, and that their knowledge and rights-based perspectives shape project evaluation.

Marten Falls First Nation expressed a clear position that each Nation holds the inherent right to make decisions about resource development within its own traditional territory, free from interference by other communities. Participants emphasized that this autonomy is a fundamental aspect of their self-determination, governance authority, and the exercise of their Treaty and inherent rights over their lands and resources (ATRI Forum, February 2023). Marten Falls First Nation community members are concerned that development in or near traditional territory will bring increased government presence and regulation, creating challenges or potential harm for community members. For example, once new roads are opened, people may begin encountering Conservation Officers in areas where they currently are not present, which means the community will need education on regulations such as firearm rules. Some members view this increased government presence as a continuation of historic pressures that restricted Indigenous culture and way of life. Because of this history, they worry that enhanced oversight will create fear, limit their freedom on the land, and hinder the community's ongoing healing from past trauma (Suslop Inc with Marten Falls First Nation, 2024). Community members expressed that they have a responsibility to protect the natural environment and wildlife and to prevent ecological imbalances. However, some feel that development will limit their ability to use the land and engage in harvesting practices that are essential not only for maintaining balance, but also for sustenance, culture, and identity. Several community members noted that the proposed roads, including the WSR, may lead to further development such as mining, additional infrastructure, and possibly new settlements. They worry that these changes will restrict their access to the land and make it more difficult to pass on land-based practices and traditions to younger generations (Suslop Inc with Marten Falls First Nation, 2024). Some community members expressed that the proposed roads may restrict their freedom of movement. They are concerned that new road infrastructure could interfere with how they currently travel across their territory, such as by snowmobile or boat.



In particular, they worry that bridge heights may limit the ability to travel easily along the rivers. Community members also fear that development will bring increased regulations and external control over their land use. They are concerned that new rules may dictate where they can go and what activities they can carry out. For some, this added level of oversight feels reminiscent of past systems of imposed control, such as residential schools or incarceration (Suslop Inc with Marten Falls First Nation, 2024). Marten Falls First Nation community members are concerned about how they will be compensated for development occurring in or near their traditional territory, whether related to roads, mining, or other projects. Some feel that the community will not receive adequate compensation for environmental damage, particularly if mining proceeds. They emphasized that compensation must be equitable, ongoing, and designed to meet collective community needs rather than only those of individual families. Even with appropriate compensation or accommodation, members also worry about how future revenue will be managed. They noted that in some First Nations involved in oil, gas, or casino development, monthly payments to members have sometimes contributed to substance misuse. From this perspective, there is concern that similar revenue distribution approaches could negatively affect the community (Suslop Inc with Marten Falls First Nation, 2024). These concerns highlight potential impacts on Marten Falls First Nation's self-determination and self-governance rights, particularly their authority to regulate land use, manage development, maintain community safety, uphold cultural responsibilities, and exercise jurisdiction over traditional territory without external interference.

Fort Albany First Nation's socio-cultural structures and governance systems have been significantly affected by settler-colonial policies. Historically, the community maintained a matrimonial clan system that formed an important foundation of its cultural identity; however, this system was disrupted as a result of colonization. The continued dominance of colonial legislation has made it difficult for Fort Albany Nation to fully reclaim and exercise its traditional laws within the current socio-political environment, even where there is a clear desire to uphold the community's inherent and Treaty Rights (Firelight Research Inc. with Fort Albany First Nation, 2024). IKLRU study participants emphasized that while Fort Albany First Nation continues to advance its own governance systems, significant confusion arises from existing legislative frameworks. They noted that these frameworks often fail to recognize or uphold Treaty Rights and inherent rights, leading to uncertainty and contributing to the ongoing marginalization of these foundational Indigenous rights. Fort Albany First Nation IKLRU study participants anticipate that the Project and other proposed roads would further impede the community's ability to steward the lands and waters within their traditional territory. They noted that increased access and associated disturbances may undermine long-standing stewardship responsibilities, limit opportunities to carry out land-based practices, and reduce the community's capacity to protect and manage culturally significant areas (Firelight Research Inc. with Fort Albany First Nation, 2024). One participant expressed deep frustration with the current political context, noting that contemporary decision-making often lacks a grounding in spirituality and long-term responsibility. They emphasized that their ancestors lived in close relationship with the land and the Creator, practicing ceremonies that fostered gratitude, balance, and stewardship for future generations. The participant observed that these spiritual foundations have been eroded over time, leading some community members to feel disconnected and vulnerable within political and economic systems that pressure them into agreements that provide only short-term financial relief. They stressed that such decisions risk compromising the well-being of future generations and further diminishing what remains of their Treaty Rights (Firelight Research Inc. with Fort Albany First Nation, 2024). Participants also highlighted that the Project and other proposed road projects may interfere with the Fort Albany First Nation's stewardship responsibilities including obligations that have been handed down from the Creator and through generations of ancestors. They emphasized that fulfilling these responsibilities requires carefully balancing development with the needs and rights of all living beings. This balance is a core cultural and governance principle for the Fort Albany First Nation and its members, and any project that threatens this responsibility was described as a direct infringement on their inherent and Treaty-protected relationship to the land (Firelight Research Inc. with Fort Albany First Nation, 2024). These concerns demonstrate potential impacts on Fort Albany First Nation's rights to self-determination and self-governance, including the ability to uphold traditional laws, carry out stewardship



responsibilities, exercise decision-making grounded in Indigenous governance systems, and protect Treaty-affirmed relationships with the land.

Kashechewan First Nation’s inherent jurisdiction over its lands and waters has been significantly constrained through the long-standing impacts of colonial policies, legislation, and regulatory systems. Despite these imposed structures, Kashechewan First Nation has continuously maintained key elements of its governance, as these responsibilities form an essential part of the Kashechewan First Nation’s culture, identity, and Way of Life. A central component of Kashechewan First Nation governance is its unceded and inherent jurisdiction within its Treaty 9 territory. This includes the inherent right to develop and administer its own laws, policies, and decision-making frameworks across a broad range of matters, consistent with First Nation’s status as a self-governing Nation. Kashechewan First Nation retains the authority to steward lands, waters, and natural resources according to its own laws, values, and long-standing cultural responsibilities. These principles are affirmed through the Mushkegowuk Council’s Declaration of Rights and Responsibilities, which emphasizes that the right to self-government and the recognition of Nation-based legal systems are fundamental to Mushkegowuk member Nations, including Kashechewan First Nation. The Declaration reinforces that Kashechewan First Nation’s governance system, laws, and jurisdiction are inherent, existing prior to colonial interference and continuing to the present, and must be respected as central components of Kashechewan First Nation’s self-determination (Kashechewan First Nation with MNP LLP, N.D.). These concerns relate directly to Kashechewan First Nation’s self-determination and self-governance rights, including jurisdiction over lands and waters, authority to apply Nation-based legal systems, and the exercise of inherent governance structures free from external constraint.

The information provided by the other LSA and RSA communities outlines potential pathways through which the Project may interact with rights related to self-determination and self-governance. Communities describe concerns about reduced ability to influence decisions affecting their lands and resources, limitations on the implementation of Indigenous-developed land use plans and stewardship priorities, and the potential erosion of community-driven authority over cultural practices, environmental management, and long-term planning. Even where information is limited, these pathways represent potential ways in which Project-related activities may affect the meaningful exercise of Aboriginal and Treaty Rights associated with self-determination, self-governance, jurisdiction, and community-driven decision-making. The Webequie Project Team interprets this information as indicating potential impacts on the meaningful exercise of these rights.

## 6.4.2 Summary of Net Effects

**Table 6-4** below is a summary of conclusions made for each of the identified potential impacts on Rights associated with Self-Determination and Self-Governance. Please refer to **Section 5.1.4** for detailed information on net effects characterization methods.

**Table 6-4 Summary and Conclusion of Potential Impacts on Aboriginal and Treaty Rights**

Potential Impacts	Study Area	Potential for Occurrence	Carry forward in Assessment?
Rights associated with Self-Determination and Self-Governance	LSA: Webequie	Low	Yes
	LSA: other communities	Low	Yes
	RSA	Low	Yes

Note: This characterization is based on the input received from “Webequie First Nation Indigenous and Treaty Rights Impact Assessment for the Webequie Supply Road” and the Project’s team interpretation of the rights impact assessment and is subject to validation from the community (Stantec Inc, 2025).



## 6.4.3 Severity Characterization

Please refer to **Section 5.1.5** for detailed information on net effects characterization methods.

### 6.4.3.1 Webequie First Nation

Impacts to Webequie First Nation rights associated with customs, protocols and laws during both construction and operations have been characterized as follows (Stantec, 2025):

- Likelihood: High
- Direction: Adverse and Positive
- Geographic Extent: Moderate
- Frequency: Multiple irregular event
- Duration and Reversibility: High
- Equity: Low
- Cultural Low
- Governance: Low
- Health: Not applicable

Effects on Webequie First Nation's customs, protocols, and laws are assessed as having a high likelihood of occurring and are predicted to be both adverse and positive in direction. The Project may intersect areas within the CBLUP and increase the number of people entering the region, which could make stewardship and land-use planning more challenging. However, as the Project proponent, Webequie First Nation will also have meaningful opportunities to participate in regulatory review and decision-making processes (Stantec Inc., 2025).

The geographic extent of impacts is predicted to be moderate, as effects will occur within the LSA and may extend into the community of Webequie. The frequency of impacts is expected to involve multiple irregular events throughout all phases of the Project. Duration and reversibility are assessed as high, given that the Project is intended to operate permanently, with no plans for decommissioning (Stantec Inc., 2025). The Project is predicted to have a low impact on equity, as effects on customs, protocols, and laws relate to Webequie First Nation's collective rights to manage lands and resources within their traditional territory and are not expected to be experienced differently across segments of the community (Stantec Inc., 2025).

Impacts to cultural well-being associated with effects on these rights are expected to be low during all phases of the Project. The Project intersects only specific areas of the draft CBLUP and is not anticipated to restrict its implementation. The Project is not expected to introduce non-Indigenous people in sufficient numbers to interfere with Webequie First Nation's ability to manage lands and resources. As Webequie First Nation is the Project proponent, and the Project is expected to be constructed and operated in alignment with Webequie First Nation laws, customs, and governance structures, adverse impacts on governance are considered low (Stantec Inc., 2025).

Health-related impacts on rights associated with customs, protocols, and laws are assessed as not applicable, as no mechanisms have been identified through which effects on these rights would result in health impacts (Stantec Inc., 2025).



### 6.4.3.2 Other LSA and RSA Communities

This section assesses the extent to which the Project may affect Aboriginal and Treaty Rights associated with self-determination and self-governance to other LSA and RSA Indigenous communities. This may include the ability of Indigenous communities to make decisions about lands, resources, and stewardship priorities. These rights encompass the authority of Indigenous Nations to implement community-driven land-use plans, uphold stewardship responsibilities, and make strategic decisions supporting long-term cultural, social, environmental, and economic objectives.

Information provided by other LSA and RSA First Nation communities highlighted concerns about how the Project may influence the conditions necessary for the meaningful exercise of self-governance and self-determination. Communities described potential effects on their authority to make decisions about lands, waters, and resources; their ability to exercise stewardship responsibilities; and their capacity to uphold Indigenous laws, governance systems, and decision-making processes. Project-related changes include increased access from non-local visitors, environmental disturbance, regulatory pressures, and shifts in population and land use. This may reduce the degree of community-driven control over traditional territories, interfere with Indigenous-led planning and stewardship, or exacerbate long-standing constraints imposed by colonial governance structures. Even where information remains limited, these concerns point to potential pathways through which the Project may affect communities' ability to direct their own governance, maintain asserted jurisdiction over lands and resources, and sustain governance practices rooted in culture, identity, and stewardship roles.

It is anticipated the other LSA and RSA communities will experience **Moderate** level of severity of Project-related impacts on Indigenous rights associated with self-determination and self-governance. This assessment reflects the central importance of self-determination and self-governance of Indigenous communities, and is based on the information provided to the Project Team to-date, with consideration of proposed mitigation and enhancement measures, and it reflects current predictions made with information available.

## 6.5 Proposed Mitigations and Enhancement Measures

The Construction Environmental Management Plan (CEMP) and Operations Environmental Management Plan (OEMP) (Section 4 and Appendix E of the Final EAR/IS) outline how biophysical effects and associated mitigation measures, monitoring, and component-specific plans will be implemented during construction and operations. The mitigation and enhancement measures are expected to reduce effects on Aboriginal and Treaty Rights. While some residual effects may remain, the combination of avoidance, minimization, monitoring, and culturally informed engagement is anticipated to maintain the environmental and cultural conditions necessary for the meaningful and ongoing exercise of Aboriginal and Treaty Rights throughout the life of the Project.

Detailed mitigation measures are provided in the following sections of the Final EAR/IS:

- Geology, Terrain, and Soils (Section 6.4)
- Surface Water Resources (Section 7.4)
- Groundwater Resources (Section 8.4)
- Atmospheric Environment (Section 9.4)
- Fish and Fish Habitat (Section 10.4)
- Vegetation and Wetlands (Section 11.4)
- Wildlife and Wildlife Habitat (Section 12.4)



- Species at Risk (Section 13.4)
- Social Environment (Section 14.4)
- Economic Environment (Section 15.4)
- Non-Traditional Land and Resource Use (Section 16.4)
- Human Health (Section 17.4)
- Visual Environment (Section 18.4)
- Cultural Heritage Resources (Section 20.4)
- Follow-up and Monitoring (Section 22)
- Accidents and Malfunctions (Section 23)
- Appendix E Mitigation Measures
- Appendix N Community Readiness Plan
- Appendix Q Health Impact Assessment Report

### **Current and Historical Use of Lands and Resources for Traditional Purposes**

Changes in the physical environment can affect the ability of Indigenous communities to exercise current and historical land- and resource-use rights. Traditional activities such as hunting, fishing, trapping, gathering, and land-based cultural practices depend on healthy ecosystems, predictable wildlife patterns, and safe access to culturally significant places. When habitat quality, water systems, vegetation communities, or travel routes are altered, resource availability and access can be reduced, limiting where and how these practices can occur and diminishing the cultural value of important areas.

To address these potential effects, the Project's mitigation measures focus on reducing disturbances to ecological conditions and culturally important landscapes so that Indigenous Knowledge, land-use patterns, and Aboriginal and Treaty Rights can continue to be meaningfully exercised through all Project phases. Environmental mitigations include limiting changes to habitat, watercourses, vegetation communities, and physical access routes to maintain the ecological functionality and cultural continuity of traditional land-use areas.

The following mitigation measures were proposed by Webequie First Nation on mitigating effects on their harvesting rights and rights to access traditional lands and waters (Stantec Inc, 2025):

- Apply dust suppressants, such as calcium products, to minimize air quality impacts and reduce the amount of airborne dust that could enter nearby waterbodies or settle on surrounding vegetation.
- Design culverts and bridges in a way that reduces potential effects on water quality.
- Reserve gravel deposits located near Webequie First Nation for future community needs.
- Design the WSR to avoid or minimize impacts on fish and fish habitat.
- WSR layout should allow surface water and groundwater to continue flowing naturally.
- Restrict construction and operation activities to the Project footprint as much as possible to reduce disturbances to surrounding forested areas.
- Provide information to the Webequie First Nation, harvesters, and land users about how the proposed camps along the WSR may influence local wildlife.
- Prohibit workers from bringing firearms or fishing equipment to project sites to reduce competition with traditional harvesters for wildlife and fish.
- Establish checkpoints along the roadway to clean equipment and monitor invasive species that may be transported on boat motors, snowmobiles, and other machinery.



- Make timber cleared during Project construction available to Webequie First Nation for use in homes, sweat lodges, firewood, or designated community harvesting camps.
- Clean up timber and brush that is cleared during WSR construction.
- Medicines located along the proposed route should be identified by Webequie First Nation Elders and Knowledge Holders before construction begins.
- Install seasonal or permanent reduced-speed signage to limit wildlife collisions and alert drivers to important calving areas.
- Stagger construction activities so adverse effects occur in one area at a time rather than across an entire zone simultaneously.
- Avoid construction activities and any potential contamination of waterbodies during fish spawning periods. Use the best available technologies and materials to prevent adverse effects and consider including Webequie First Nation monitors.
- Reduce idling of heavy equipment when not in operation.
- Minimize clearing and environmental disturbances to the greatest extent possible.
- Implement measures to reduce sensory disturbances (noise, light, vibration) resulting from construction, road maintenance, and traffic.
- Monitor for wildlife-vehicle collisions and promptly remove any injured or deceased animals from the roadway.
- Webequie First Nation should obtain a degree of control over the section of the WSR that accesses the community's reserve lands.
- Work with Webequie First Nation land users to mitigate changes to accessing traditional lands and waters through timing of Project activities, scheduling of construction, signage, and identification of potential alternate routes of access.
- Communicate the schedule of Project activities throughout construction and operation phases to Webequie First Nation land users.
- Flag or mark segments of traditional trails that will be affected or disrupted by the Project.
- Implement measures to minimize sensory disturbances associated with construction, road maintenance, and traffic.

### **Cultural Continuity**

Mitigation measures also support cultural continuity by integrating Indigenous Knowledge early in planning and throughout construction and operational phases. This includes working with Indigenous Knowledge Keepers and community representatives to identify culturally significant sites, practices, and seasonal activities. Where culturally important areas may be affected, avoidance will be prioritized; when avoidance is not feasible, strategies such as redesign, buffer zones, or adjusted work schedules will be used to reduce potential impacts. Opportunities for community-led monitoring, ongoing engagement, and the incorporation of traditional knowledge into decision-making help safeguard living cultural practices for future generations.

Potential adverse effects on travel routes, harvesting areas, habitation sites, culturally sensitive areas, and other cultural heritage landscapes are assumed to be mitigated to a degree through a combination of avoidance, design refinements, and site-specific measures. Within the 250-m buffer, where indirect effects may occur, visual, noise, and access-related mitigation measures can be applied, along with protective setbacks around culturally sensitive locations, harvesting zones, and known habitation sites. For areas identified by Webequie First Nation as culturally sensitive and important area for plant harvesting and spring water collection, enhanced protection measures like cultural monitors, no-go zones, and construction timing restrictions are predicted to help reduce potential disturbance.



The following mitigation measures were proposed by Webequie First Nation on mitigating effects on their rights associated with cultural and experiential rights (Stantec Inc., 2025):

- Provide funding to support language revitalization efforts and the preservation of the community's dialect.
- Provide funding to support the long-term success of the *Choose Life* program.
- Protect sacred areas through the use of spiritual monitors that are trained by Elders in the community.
- Implement measures to reduce sensory disturbances caused by construction, road maintenance, and traffic conditions.
- Provide funding to support cultural activities like ceremonies that are not mentioned in funding formulas or funding streams.

### **Socio-Economic, Health and Well-Being**

Mitigation measures also address socio-economic and community well-being rights by supporting equitable participation in economic opportunities, enhancing community capacity, and protecting community health. These actions also help minimize environmental changes that could affect cultural practices or traditional land use.

Webequie First Nation has also provided the following additional recommendations for mitigating effects on the rights associated with socio-economic and well-being (Stantec Inc., 2025):

- Testing to monitor water quality on should be completed on a regular basis.
- Implementation of measures or security by Webequie First Nation monitors that would allow the community to know who is using the road and for what purposes. Additionally, the possibility of searching individuals who are accessing the community by road for drugs and alcohol.
- Provide funding for housing to support the aging population, such as townhouses or old age homes.
- Provide funding for current issues related to housing and overcrowding, as well as treatment centres and a land-based healing program for people dealing with addictions.
- Priority should be given to economic development opportunities for Webequie First Nation members.
- Industrial or commercial lands should be set aside near the "Ring of Fire" for Webequie First Nation community members to grow their own businesses and cater to those working at proposed mine sites; any lands zoned for this purpose should prioritize the establishment of businesses owned by Webequie First Nation first.

### **Self-Determination and Self-Governance**

Mitigations related to the rights of self-determination and self-governance focus on ensuring that Project activities respect, uphold, and do not adversely affect the ability of Indigenous communities to make decisions about their lands, resources, and internal affairs. Through engagement, recognition of Indigenous jurisdiction, and involvement in Project decision-making, these measures reinforce First Nation governance systems and support reconciliation-aligned outcomes. For Webequie First Nation specifically, the rights assessment anticipates low residual impacts to self-determination and governance because Project activities will be carried out in accordance with Webequie's own laws, customs, and land-management protocols. Additional mitigation measures aim to avoid introducing non-Indigenous personnel at levels that could interfere with community governance or land-management systems, ensuring that any effects are experienced collectively rather than disproportionately.



Webequie First Nation has recommended the following mitigations in support of rights related associated with customs, protocols and, laws (Stantec Inc, 2025):

- Implement measures to prevent accidents and spills, including appropriate road signage, Indigenous monitoring and speed enforcement.
- Webequie First Nation should be informed on all aggregate source locations; studies are required to identify gravel east of the community.
- Webequie First Nation members should have input into how accidents will be managed and mitigated.
- Webequie First Nation monitors should provide input on the Project's overall design, including the proposed route, locations for camps and all water crossings.
- Open, honest, and transparent communication with Webequie First Nation members regarding the Project are required
- Development of the Project should be done in respect of Webequie First Nation's Three-Tier model.
- Communicate potential Road-related impacts to Webequie First Nation members in a timely and accessible manner.
- Impacts associated with the Webequie Supply Road should be communicated to Nation members.

Mitigation and enhancement measures within the Final EAR/IS including avoidance, monitoring, culturally informed planning, and governance aligned engagement is expected to reduce effects on rights associated with current and historical use of lands for traditional purposes, cultural continuity, socio-economic, health and well-being, self-determination, and self-governance. These measures aim to maintain the environmental, cultural, and governance conditions necessary for Indigenous communities to continue exercising their Aboriginal and Treaty Rights.

## 6.6 Summary of Potential Effects, Mitigation Measures and Predicted Net Impacts for Aboriginal and Treaty Rights

**Table 6-5** identifies key mitigation measures to eliminate, reduce or minimize potential adverse impacts, or enhance positive effects of the Project identified in **Section 6**. Further measures are provided in the CRP (Appendix N), Final EAR/IS Sections 6-18 and 20 as well as the CEMP and OEMP (Section 4 of the Final EAR/IS).

The summary table below is based on currently available information from Webequie First Nation. The potential impacts identified in relation to Aboriginal and Treaty Rights are understood to align with those associated with traditional land use and cultural continuity. Accordingly, the same mitigation measures proposed for traditional land use are considered applicable to the protection of Aboriginal and Treaty Rights.

**Table 6-5: Summary of Potential Effect, Mitigation Measures and Predicted Net Impacts for Aboriginal and Treaty Rights**

Indigenous Peoples' Values and Rights	Potential Net Effect	Mitigation and Enhancement Measures*	Predicted Impact**
Rights associated with Current and Historical Use of Lands and Resources for Traditional Purposes	<ul style="list-style-type: none"> <li>▪ Loss and/or alteration of lands and resources for traditional harvesting;</li> <li>▪ Loss of and/or alteration of sites and areas used for traditional harvesting; and</li> <li>▪ Loss of and/or alteration of access to lands and resources used for traditional harvesting.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Implementation of CRP;</li> <li>▪ Use dust suppressants (e.g., calcium) to reduce air-quality impacts and airborne dust from entering water or settling on vegetation;</li> <li>▪ Design culverts and bridges to reduce impacts on water quality;</li> <li>▪ Preserve gravel sources near the community for community's own use;</li> <li>▪ Minimize fish and habitat impacts in the design;</li> <li>▪ Maintain natural surface and groundwater flow in the design;</li> <li>▪ Limit activities to the Project Footprint to reduce disturbance to adjacent forests;</li> <li>▪ Inform harvesters and land users on how proposed camps may affect wildlife;</li> <li>▪ Prohibit Project workers from bringing firearms or fishing gear to prevent disturbance to traditional harvesting practices;</li> <li>▪ Use roadway checkpoints to clean equipment and monitor for invasive species on boat motors and snowmobiles;</li> <li>▪ Provide harvested timber to the community for own use (e.g., homes, sweat lodges, firewood, camps);</li> <li>▪ Clean up timber and brush cleared for road construction;</li> <li>▪ Have Elders and Knowledge Holders identify medicines along the route before construction;</li> <li>▪ Post seasonal or permanent reduced-speed signage to lower wildlife collisions and protect calving areas;</li> <li>▪ Stagger construction so impacts occur in one area at a time;</li> <li>▪ Avoid in-water work during fish spawning and use best technologies to prevent contamination; engage community monitors;</li> <li>▪ Reduce idling of heavy equipment;</li> </ul>	Yes (net adverse impact)



Indigenous Peoples' Values and Rights	Potential Net Effect	Mitigation and Enhancement Measures*	Predicted Impact**
		<ul style="list-style-type: none"> <li>▪ Minimize land clearing and environmental impacts wherever possible;</li> <li>▪ Implement measures to reduce sensory disturbances from construction and traffic;</li> <li>▪ Monitor wildlife-vehicle collisions and remove injured or dead animals from the road;</li> <li>▪ Communicate Project activity schedules during construction and operation to Webequie First Nation;</li> <li>▪ Flag or demarcate traditional trail sections that may be affected by the Project; and</li> <li>▪ Mitigate sensory disturbances from construction, road maintenance, and traffic.</li> </ul>	
Rights associated with Cultural Continuity	<ul style="list-style-type: none"> <li>▪ Loss and/or alteration of sites and areas used for cultural and spiritual purposes;</li> <li>▪ Loss and/or alteration of access to lands and resources used for cultural and spiritual purposes;</li> <li>▪ Change to cultural traditions and practices, including use and preservation of Indigenous languages; and</li> <li>▪ Impacts to the continuation and transmission of rights based cultural knowledge.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Implementation of CRP;</li> <li>▪ Fund language revitalization and preservation of the community's dialect;</li> <li>▪ Provide financial support to support the long-term sustainability of the Choose Life program.</li> <li>▪ Protect sacred areas using spiritual monitors trained by community Elders; and</li> <li>▪ Fund cultural activities, including ceremonies not covered by existing funding programs.</li> </ul>	Yes (net adverse impact)
Rights associated with Socio-Economic, Health and Well-Being	<ul style="list-style-type: none"> <li>▪ Impacts to food security and health-related rights;</li> <li>▪ Impacts to rights on social cohesion, well-being and quality of life;</li> <li>▪ Impacts to the right to culturally appropriate and accessible health care;</li> <li>▪ Impacts to rights related to social well-being and protection; and</li> <li>▪ Impacts to community health and wellness rights.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Implementation of CRP;</li> <li>▪ Conduct regular testing to monitor water quality;</li> <li>▪ Implement measures or Webequie First Nation-led security monitoring to track road users and purposes, including searching community visitors for drugs and alcohol;</li> <li>▪ Fund solutions for housing and overcrowding, as well as treatment centres and land-based healing programs;</li> <li>▪ Prioritize economic development opportunities for community members;</li> </ul>	Yes (net adverse impact)



Indigenous Peoples' Values and Rights	Potential Net Effect	Mitigation and Enhancement Measures*	Predicted Impact**
		<ul style="list-style-type: none"> <li>▪ Use measures such as road signage, Indigenous monitoring, and speed enforcement to prevent accidents and spills; and</li> <li>▪ Set aside commercial/industrial land near the Ring of Fire for Webequie community-owned businesses serving proposed mine workers, with zoning that prioritizes Webequie community member-owned enterprises.</li> </ul>	
Rights associated with to Self-Determination and Self-Governance	<ul style="list-style-type: none"> <li>▪ Impacts to right for self-determination and self-governance; and</li> <li>▪ Impacts to the Nation's strategic decision-making authority and right for self-determination and self-governance.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Provide a degree of control over the section of WSR that accesses the Webequie First Nation's reserve lands;</li> <li>▪ Work with Webequie First Nation land users to reduce access impacts through timing, signage, and alternate routes;</li> <li>▪ Community should be consulted on all aggregate source locations, and studies are needed to identify gravel deposits east of Webequie First Nation;</li> <li>▪ Indigenous monitors should help shape the Project's overall design, including the route, camp locations, and all water crossings;</li> <li>▪ Open, honest and transparent conversations with community members regarding the Project are required;</li> <li>▪ Development of the Project should be done in respect of Webequie First Nation's Three-Tier model; and</li> <li>▪ Impacts associated with the WSR should be communicated to community members.</li> </ul>	Yes (net adverse impact)

Note: C = Construction Phase; O = Operations Phase

\*Mitigation measures from Final EAR/IS Section 6-18, 20, 22, 23, Appendix E, Appendix N and Appendix Q are applicable in addition to mitigation measures identified in this column. \*\*The Predicted Impact is characterized based on the Project's current understanding of its potential effects, as well as its interpretation of input, feedback, and studies provided by communities.



# 7 Cumulative Effects on the Exercise of Aboriginal and Treaty Rights

## 7.1 Approach to Cumulative Effects on Rights

This subsection describes the assessment for cumulative effects on the exercise of Aboriginal and Treaty Rights and will take a holistic approach to determine the assessment of cumulative effects of all Project VCs on the exercise of Aboriginal and Treaty Rights.

For predicted net effects on Aboriginal and Treaty Rights that were determined to be significant in nature, a cumulative effects assessment was conducted. The cumulative effects assessment is an evaluation of significant net effects from the Project that overlap temporally and spatially with effects from other past, present and reasonably foreseeable developments (RFDs) and activities (i.e., cumulative effects). The detailed assessment methodology utilized is provided in Final EAR/IS Section 21.

Where information is available, the cumulative effects assessment estimates or predicts the contribution of effects from the Project and other activities on the criteria, in the context of changes to the natural, health, social or economic Aboriginal and Treaty Rights. For a valued component that has identified net effects where the magnitude was determined to be higher than negligible, it is necessary to determine if the effects from the Project interact both temporally and spatially with the effects from one or more past, present RFDs or activities, since the combined effects may differ in nature or extent from the effects of individual Project activities.

For the assessment of Aboriginal and Treaty Rights, the following predicted net effects characterized in **Section 6** are carried forward to the cumulative effects assessment:

- Moderate to high in magnitude;
- Local or regional in extent;
- Medium to long-term in duration;
- Effect could require management and represents an impact on community rights. Adverse net effects may be considered significant even with a low likelihood of occurrence; and
- Identified as a key concern or interest by Indigenous communities and groups.

The predicted net effects with this characterization are most likely to interact with other RFD and activities.

The cumulative effects assessment for Aboriginal and Treaty Rights has been primarily informed by the Webequie First Nation rights assessment, as well as IKLRU studies and correspondence provided by other LSA and RSA communities. It describes how the interacting effects of projects and activities and natural factors are predicted to affect Aboriginal and Treaty Rights for:

- Rights associated with Current and Historical Use of Lands and Resources for Traditional Purposes;
- Rights associated with Cultural Continuity;
- Rights associated with Socio-Economic, Health and Well-Being; and
- Rights associated with Self-Determination and Self-Governance;

The assessment is presented as a reasoned qualitative narrative describing the predicted outcomes of cumulative effects on Aboriginal and Treaty Rights.

As noted in Section 21.3 of the EAR/IS, in accordance with Section 22 of the TISG, the cumulative effects assessment considers the cumulative effects on Indigenous Peoples' values that may affect Indigenous Peoples and the exercise of their Aboriginal and Treaty Rights, and comments and issues of concern from the engagement and consultation with potentially affected Indigenous communities are integrated into the cumulative effects assessment. Extensive engagement and consultation efforts were carried out during the preparation of the EAR/IS, including meetings, technical sessions, workshops, written requests for input, and review opportunities.

## 7.2 Context on Cumulative Effects on Rights

### 7.2.1 Webequie First Nation

Cumulative effects on Aboriginal and Treaty Rights can arise from the combined environmental and social effects of past, existing, and reasonably foreseeable future projects on the surrounding landscape. Although the Project is proposed within a relatively undisturbed area, there remains potential for cumulative effects on Aboriginal and Treaty Rights if the Project's environmental impacts interact with, or add to, those from other developments or land-use activities. For the purposes of this assessment, reasonably foreseeable future projects and activities are defined as those that: (a) have been publicly announced with a defined execution timeline and sufficient detail to allow for meaningful evaluation, (b) are currently undergoing an environmental assessment, or (c) are in a permitting or regulatory approval process. The criteria for assessing severity of predicted impacts to the context for cumulative effects is provided in **Section 5.1.5**.

The information presented below is based on the 'Webequie First Nation Indigenous and Treaty Rights Impact Assessment for the Webequie Supply Road' report developed for the Project and has been used to inform the assessment of potential effects on Webequie First Nation rights.

#### 7.2.1.1 Assessment of Potential Cumulative Effects to Rights Associated with Current and Historical Use of Lands and Resources for Traditional Purposes

Cumulative effects on the exercise of harvesting rights may arise where the Project interacts with other regional activities and projects which could contribute to habitat loss, increased mortality risk for harvested species, vegetation removal, or sensory disturbances that influence harvester perceptions of the health and safety of resources for consumption (Stantec, 2025). Webequie First Nation has raised concerns about the cumulative effects of mining development proposed to follow the road construction, particularly regarding potential disruptions to drinking water quality, effects on harvesting activities, and additional contributions to climate change. Other projects and activities with the potential to interact cumulatively with the Project are a considerable distance from the Project and are not expected to affect habitat availability or the sustainability of species harvested within the RSA. Given the relatively undisturbed environmental setting in which the Project will operate, and the limited scale and extent of past, current, and anticipated future development, cumulative effects on Webequie First Nation harvesting rights are assessed as low (Stantec, 2025).

Cumulative effects on Webequie First Nation rights to access traditional lands and waters may occur where the Project interacts with other past, existing, or reasonably foreseeable future projects and activities to cause disturbance to trails and travelways or create impediments to access through fencing or other barriers within the RSA. Cumulative limitations on access may include regulatory requirements such as hunting or fishing registration and quota systems that constrain the exercise of rights. Sensory disturbances may also accumulate when Project-related effects coincide with similar disturbances from other regional activities. It is noted that communities in southern regions, such as southern Ontario, once relied on lakes for drinking water just as

people in Webequie First Nation do today. They cautioned that without strict safeguards on industrial development, the community may no longer be able to drink directly from local lakes. Webequie First Nation informants also expressed concern about the Project's potential contribution to climate change and questioned how the community would be compensated for any resulting impacts (Stantec Inc., 2025).

Most other projects and activities with potential to interact cumulatively with the Project are located at considerable distances and are not expected to affect the availability of trails, travelways, waterbodies, harvesting areas, or habitation sites within the RSA. Other projects and activities are not expected to enhance the positive impacts of the Project on Webequie First Nation access to traditional lands and waters. Given the relatively undisturbed environmental conditions in the area, and the limited scale and extent of past, existing, and foreseeable future development, cumulative effects on Webequie First Nation rights to access traditional lands and waters are assessed as low (Stantec Inc., 2025).

### **7.2.1.2 Assessment of Potential Cumulative Effects to Rights Associated with Cultural Continuity**

Potential cumulative effects on Webequie First Nation's cultural and experiential rights may arise if the Project interacts with other past, existing, or reasonably foreseeable activities in ways that diminish meaningful opportunities for intergenerational teaching, cultural transmission, and the use of culturally significant sites and areas. Sensory disturbances associated with the Project could also affect the quiet enjoyment of the land, particularly if these disturbances occur at the same time as similar effects from other developments (Stantec Inc., 2025).

Most other projects and activities that could theoretically interact with the Project are located at considerable distances and are not expected to contribute to losses in cultural transmission or the value of cultural sites during the construction phase. However, during operations, Project-related impacts may interact cumulatively with effects from the Marten Falls Community Access Road (MFCAR) and Northern Road Link (NRL) projects, which together will connect the Webequie First Nation community to the provincial road network. Community members have noted that increased road access may elevate the presence of outsiders and the increased shipment of drugs and alcohol into the community, which could in turn affect the Nation's ability to maintain its language, traditions, and cultural practices (Stantec Inc., 2025).

Considering the relatively undisturbed environment in which the Project is located, along with the scale, scope, and proximity of past, existing, and anticipated future developments, cumulative effects on Webequie First Nation cultural and experiential rights are assessed as low during construction but moderate during operations (Stantec Inc., 2025).

### **7.2.1.3 Assessment of Potential Cumulative Effects to Rights Associated with Socio-Economic, Health and Well-Being**

Cumulative effects on Webequie First Nation's socio-economic and well-being rights may occur where the Project interacts with other past, existing, or reasonably foreseeable activities in ways that influence socio-economic conditions or community well-being. These effects may include changes in employment and contracting opportunities, household incomes, and the return of commercial outfitting activities, as well as impacts on community well-being through reduced access to traditional foods, decreased air quality, and changes in the delivery of health care. It is recognized that impacts on Webequie First Nation socio-economic and well-being rights may be both adverse and positive (Stantec Inc., 2025).

Other projects and activities that could potentially interact cumulatively with the Project are located at considerable distances and are therefore not expected to contribute to changes in Webequie First Nation socio-economic conditions or community well-being during the construction phase. However, during operations, the Project's effects may combine with those from the MFCAR and NRL projects, which together will connect Webequie First Nation community to the provincial road network. This increased access is expected to expose Webequie First Nation to additional economic opportunities through employment and contracting on other projects, resulting in both beneficial and adverse outcomes (Stantec Inc., 2025).

Given the current socio-economic context in which the Project will operate, and considering the scale and scope of past, existing, and anticipated future developments, cumulative effects on Webequie First Nation socio-economic and well-being rights are assessed as low during construction but moderate during operations (Stantec Inc., 2025).

#### **7.2.1.4 Assessment of Potential Cumulative Effects to Rights Associated with Self-Determination and Self-Governance**

Webequie First Nation expressed concern that the ongoing impacts of colonial processes continue to limit the community's ability to participate in their traditional way of life and exercise their Indigenous and Treaty Rights. Respondents noted that these existing pressures may act cumulatively with the Project's effects, further influencing community resilience and the ability to exercise their rights (Stantec Inc., 2025). Respect for Webequie First Nations' rights, including their customs, protocols, and laws, is essential for the future success of industrial development in the region. Community members expressed frustration with the Government of Ontario's current exploration and permitting processes, noting that the province often issues permits without meaningful consultation, despite the Nation's deep connection to and stewardship responsibilities over their lands. During validation sessions, community members also expressed frustration with ongoing engagement processes occurring in other communities. They noted that since the discovery of the Ring of Fire, there has been increased interest from various groups seeking to benefit from development in the region. According to community members, some external communities appear primarily interested in obtaining economic benefits from these projects. Community members emphasized that decisions about whether to support or not support development within their traditional territory rest solely with Webequie First Nation (Stantec Inc., 2025). Community informants expressed concern about the Ontario Ministry of Transportation's plans to reorient the runway at Webequie First Nation's airport to accommodate larger aircraft associated with potential Ring of Fire development. They noted that Eastwood Island where the current airport is located is too narrow to support such redevelopment and that the proposed changes could restrict community access to their landfill. The informant recommended that land be designated at the opposite end of the road, closer to the Ring of Fire, for a new, larger airport capable of handling the aircraft required to transport goods. During validation sessions for this report, community members also raised concerns about an additional proposed road they had heard would extend west from Webequie First Nation and connect to Highway 808. They indicated that a more appropriate and beneficial route would connect to Osnaburg, which they felt would allow Webequie First Nation greater control over the regional road network (Stantec Inc., 2025).

Cumulative effects on rights related to Webequie First Nation's customs, protocols, and laws may occur where the Project interacts with other past, existing, or reasonably foreseeable activities in ways that affect the First Nation's ability to manage lands and resources within their traditional territory or participate in decision-making for sustainable land use. It is recognized that impacts on rights related to FN customs, protocols, and laws may be both adverse and positive.

Given the Webequie First Nation's direct role in project decision-making, and considering the scale and scope of past, existing, and reasonably foreseeable future developments, cumulative effects on rights related to Webequie First Nation's customs, protocols, and laws are assessed as low during all phases of the Project (Stantec Inc., 2025).



## 7.2.2 Other LSA and RSA Communities

The concerns of other LSA and RSA communities about potential cumulative effects on traditional land use, cultural continuity, socio-economic, health and well-being and self-governance and self-determination which have been highlighted through feedback received to-date during the EA/IA process, is provided in the EAR/IS.

The primary cumulative-effects concerns that were raised assert that the cumulative assessment is too narrow, incomplete, and inconsistent with federal guidance, resulting in significant foreseeable impacts being excluded. Indigenous communities emphasize that the WSR cannot be treated as a standalone Project because it will inevitably enable extensive Ring of Fire mining, additional roads, transmission lines, and potential hydropower development, all of which must be evaluated together to understand long-term pressures on lands, waters, wildlife, cultural continuity, and the exercise of Aboriginal and Treaty Rights. They note that important pathways including impacts on migratory caribou, hydrology, downstream water systems traditional land use, and climate-change interactions are omitted or insufficiently analyzed. Many Nations also stress that cumulative effects on their rights, traplines, harvesting, and community well-being are underestimated, as the assessment excludes reasonably foreseeable development and lacks meaningful integration of Indigenous Knowledge. Overall, communities consistently call for a more precautionary and regionally scaled cumulative-effects assessment that reflects the full scope of induced industrial development expected to follow the road.

## 7.3 Past and Ongoing Effects

Following the “Interim Cumulative Effects Assessment Guidance Document,” past, present, and ongoing RFDs and activities are considered to define baseline conditions for cumulative effects on rights. As such, the baseline conditions outlined in this Addendum presently reflect the effects from these projects and activities within the RSA. The information summarized below reflects the content of the Webequie First Nation rights assessment, as well as IKLRU studies and correspondence from other LSA and RSA communities.

Table 21-1 of the Final EAR/IS Section 21 Cumulative Effects Assessment identifies projects and activities (IDs 1 to 18) and indicates where their effects spatially overlap with the RSA and the Project’s net effects on the Aboriginal and Treaty Rights. Therefore, the cumulative effects assessment for Aboriginal and Treaty Rights is focused on integrating the Project’s net adverse effects with those of future RFDs and activities discussed in **Section 6**.

## 7.4 Other Ongoing and Reasonably Foreseeable Projects or Activities

A list of the RFDs and activities that were considered for the cumulative effects assessment were presented in Table 21-1 (ID’s 19 to 39) (Final EAR/IS Section 21 Cumulative Effects Assessment). Of the projects and activities that were listed in Table 21-1, only those shown in **Table 7-1** were identified as potential contributors to the net effects on the RSA for the Aboriginal and Treaty Rights, therefore, have the potential to result in cumulative effects in the RSA.

**Table 7-1: Aboriginal and Treaty Rights – RFDs or Future Activities in the RSA**

ID	Project or Activity	Spatial Overlap of Net Effects	Temporal Overlap of Net Effects	Included in Cumulative Effects Analysis
1	DeBeers’ Victor Mine	No	No	No

ID	Project or Activity	Spatial Overlap of Net Effects	Temporal Overlap of Net Effects	Included in Cumulative Effects Analysis
2	Orla Mining Ltd.'s Musselwhite Mine (formerly Goldcorp's Musselwhite Mine)	No	Yes	Yes
3	Equinox Gold Corp.'s Greenstone Mine (formerly Greenstone Gold's Hardrock Mine)	No	Yes	No
4	Construction of upgrades to the Anaconda and Painter Lake Forestry Access Roads	No	Yes	Yes
5	Wataynikaneyap Transmission Project (also known as New Transmission Line to Pickle Lake)	No	Yes	Yes
6	Ogoki Diversion	No	Yes	No
7	Long Lac Diversion	No	Yes	No
8	Rapid Lynx Broadband Project (Phase 1)	Yes	Yes	Yes
9	New Fibre Installation / Upgrade Multiple Towers at various locations in Pikangikum First Nation, Cat Lake First Nation, and Kasabonika First Nation: <ul style="list-style-type: none"> <li>▪ Bearskin Lake</li> <li>▪ Big Trout Lake</li> <li>▪ Cat Lake</li> <li>▪ Deer Lake</li> <li>▪ Kasabonika Lake</li> <li>▪ Kewaywin</li> <li>▪ Kingfisher Lake</li> <li>▪ Muskrat Dam</li> <li>▪ North Spirit Lake</li> <li>▪ Pikangikum</li> <li>▪ Poplar Hill</li> <li>▪ Sachigo Lake</li> <li>▪ Sandy Lake</li> <li>▪ Slate Falls</li> <li>▪ Wapekeka (Angling Lake)</li> <li>▪ Wawakapewin</li> <li>▪ Weagamow</li> <li>▪ Wunnumin Lake</li> </ul>	No	Yes	No
10	Forest management units (FMUs)	No	Yes	No
11	Webequie First Nation – Nursing Station Bulk Fuel Storage Upgrades	Yes	Yes	Yes
12	Kasabonika Lake New 7 – 12 school	No	Yes	No
13	Kingfisher Lake First Nation K4-10 School	No	Yes	No
14	Kingfisher Lake First Nation Subdivision Phase 2	No	Yes	No
15	Neskantaga First Nation New Construction of an 8-plex teachers' residence	No	Yes	No
16	Wapekeka First Nation New School Project	No	Yes	No
17	Wunnumin H1RCI Compound Construction	No	Yes	No



ID	Project or Activity	Spatial Overlap of Net Effects	Temporal Overlap of Net Effects	Included in Cumulative Effects Analysis
18	Wunnumin Lake First Nation Teacherages Project	No	Yes	No
19	Black Horse Project and Big Daddy Project	Yes	Yes	Yes
20	Eagle's Nest Project	Yes	Yes	Yes
21	Marten Falls Community Access Road Project	Yes	Yes	Yes
22	Northern Road Link Project	Yes	Yes	Yes
23	Webequie Supply Road	Yes	Yes	Yes
24	East-West Road	Yes	Yes	Yes
25	Kashechewan First Nation Road to Site 5 Project	No	Yes	No
26	Hydroelectric generation and transmission connection development opportunities in Albany and Attawapiskat Rivers area	No	Yes	No
27	Rapid Lynx Broadband Project (Phase 2)	Yes	Yes	Yes
28	Forest management units (FMUs)	No	Yes	No
29	Black Thor, Blackbird, and Black Label Mineral deposits	Yes	Yes	No
30	Juno Corporation Mining Exploration Activity	Yes	Yes	Yes
31	Northern Star Eagle Limited and Southern Star Eagle Limited Drilling Program	Yes	Yes	Yes
32	Development of 10 Lot Residential Subdivision on Eabametoong First Nation	No	Yes	No
33	Kasabonika Lake First Nation Band Representative Facility	No	Yes	No
34	Neskantaga Community Recreation Centre	No	Yes	No
35	Kinonjeoshtegon-CHRT 41-CFS Centre and Associated Building-P048401-2425	No	Yes	No
36	Kitchenuhmaykoosib Inninuwug Wastewater System Upgrades & Expansion	No	Yes	No
37 38 39	Transportation of ore from future development near the Project for processing, once past the Webequie Supply Road, potentially involving the following: <ul style="list-style-type: none"> <li>▪ Ferrochrome Production Facility (proposed)</li> <li>▪ Sudbury Smelter (existing)</li> <li>▪ Road from Nakina to Ferrochrome Facility and Sudbury Smelter (existing)</li> </ul>	Yes	Yes	Yes
-	Winter Roads - Increased winter road traffic by future mining proponents	Yes	Yes	Yes
-	Climate Change	Yes	Yes	Yes



## 7.5 Analysis of Cumulative Effects on Rights

Cumulative effects may occur where the Project and other RFDs or activities interact within the RSA boundary of the Aboriginal and Treaty Rights. The cumulative effects to the Aboriginal and Treaty Rights context may occur due to Project and RFDs and activities that overlap spatially and temporally.

The RFDs included in the cumulative effects analysis for the Aboriginal and Treaty Rights are as follows:

- DeBeers' Victor Mine;
- Orla Mining Ltd.'s Musselwhite Mine (formerly Goldcorp's Musselwhite Mine);
- Construction of upgrades to the Anaconda and Painter Lake Forestry Access Roads;
- Wataynikaneyap Transmission Project (also known as New Transmission Line to Pickle Lake);
- Rapid Lynx Broadband Project (Phase 1);
- Webequie First Nation – Nursing Station Bulk Fuel Storage Upgrades;
- Black Horse Project and Big Daddy Project;
- Marten Falls Community Access Road Project;
- Northern Road Link Project;
- East-West Road;
- Rapid Lynx Broadband Project (Phase 2);
- Juno Corporation Mining Exploration Activity;
- Northern Star Eagle Limited and Southern Star Eagle Limited Drilling Program;
- Transportation of ore from future development near the Project for processing, once past the Webequie Supply Road;
- Winter Roads – Increased winter road traffic by future mining proponents; and
- Climate Change.

Based on the Project Footprint for the WSR Project the cumulative effects on Aboriginal and Treaty Rights are predicted to be on:

- Rights Associated with Current and Historical Use of Lands and Resources for Traditional Purposes;
- Right associated with Cultural Continuity;
- Right associated with Socio-Economic, Health and Well-Being; and
- Rights Associated with Self-Determination and Self-Governance.

Based on Webequie First Nation's rights assessment, low level of effects are anticipated for the rights associated with Current and Historical Use of Lands and Resources for Traditional Purposes and rights associated with Self-Determination and Self-Governance, and moderate level of effects are anticipated for rights associated with Cultural Continuity and Rights associated with Socio-Economic Conditions, Health, and Well-Being (during operations) (Stantec Inc, 2025).

Based on the Project Team's current understanding of the other LSA and RSA communities' concerns, information that have been provided by the communities, and current understanding of the Project and RFDs effects, it is anticipated that the cumulative effects on these rights have a **Low to Moderate** level of effect for the LSA and the RSA communities.



Cumulative effects on Webequie First Nation cultural and experiential rights were considered to arise when the Project interacts with other existing or future projects. These combined effects could contribute to reduced opportunities for intergenerational knowledge transfer and cultural transmission, diminished value or importance of culturally significant sites, and broader pressures on Webequie First Nation traditions and cultural identity. The construction and operation of all-season roads, WSR, NRL, and MFCAR, will provide year-round access between previously isolated communities and the provincial highway network. This increased accessibility is expected to result in substantial changes, with both positive and negative implications. This increased access may lead to a greater presence of non-community members, as well as elevated risks related to drugs and alcohol, which could in turn affect the ability of Webequie First Nation to sustain their language, traditions, and cultural practices. Completion of all-season roads will also provide Webequie First Nation with expanded opportunities for employment and economic development over a longer time horizon, as well as an increased presence of temporary workforce camps during this period. Vulnerable groups within the community, including Indigenous women and girls, youth, Elders, and 2SLGBTQQIA+ individuals, may experience these changes differently, depending on their access to Project-related benefits and the effectiveness of measures implemented to mitigate adverse effects. Completion of the WSR, NRL, and MFCAR will also facilitate the development of mining operations in the Ring of Fire region. The timing of those mining activities remains uncertain, but they are anticipated to proceed only after all-season road projects have been built.

Climate change may act cumulatively with the Project to influence community cohesion, personal safety, and traffic safety. Climate-related impacts are ongoing, interact with other stressors, and may be experienced more intensely by First Nations. Extreme events, such as wildfires, severe flooding, and other extreme weather, could further interact with Project impacts by disrupting community stability, fragmenting or displacing households, and triggering evacuation orders. Climate-related changes may intensify stresses linked to Project activities, such as in-migration and land-use shifts, by disrupting traditional practices, increasing competition for natural resources, and creating greater uncertainty about long-term community stability. Travel safety may also be affected, as climate change contributes to more unpredictable road conditions and severe weather events, while the Projects increase traffic volumes and introduce drivers who may be unfamiliar with local conditions. These factors may have compounding effects on Webequie First Nation's Rights associated with Cultural Continuity and Rights associated with Socio-Economic Conditions, Health, and Well-Being during the Operations Phase.

**Table 7-2** summarizes the other RFDs or future physical activities in the RSA that have the potential to contribute to changes to Aboriginal and Treaty Rights.

**Table 7-2: Aboriginal and Treaty Rights – Summary of Cumulative Effects**

ID	RFD or Activity	Potential Cumulative Effects	Spatial / Temporal Considerations and Effect Pathways	Potential Change	Relative Change in the RSA (%)
2	Orla Mining Ltd.'s Musselwhite Mine (formerly Goldcorp's Musselwhite Mine)	<ul style="list-style-type: none"> <li>• Right associated with Current and Historical Use of Lands and Resources for Traditional Purposes;</li> <li>• Right associated with Cultural Continuity;</li> <li>• Right associated with Socio-Economic, Health and Well-Being; and</li> <li>• Right associated with Self-Determination and Self-Governance.</li> </ul>	<p>The Orla Mining Ltd.'s Musselwhite Mine project (Phase 1) is assumed to temporally overlap with Project activities based on the information available. Activities associated with Mine development are expected to have similar pathways to the Project. This may include reduced ability to practice spiritual and ceremonial rights, alteration of access to lands and resources used for cultural and spiritual purposes and rights, changes to cultural traditions and practices, including use and preservation of Indigenous languages, loss and alteration of existing natural environment including traditional foods and harvesting areas, and impacts to community social, health and wellness rights.</p>	<ul style="list-style-type: none"> <li>▪ Reduced ability to exercise harvesting rights;</li> <li>▪ Effects to the continuation and transmission of rights based cultural knowledge;</li> <li>▪ Effects to food security and health-related rights;</li> <li>▪ Effects to rights on social cohesion, well-being and quality of life;</li> <li>▪ Effects to rights related to social well-being and protection;</li> <li>▪ Effects to community health and wellness rights;</li> <li>▪ Effects to right for self-determination and self-governance; and</li> <li>▪ Effects to the Nation's strategic decision-making authority and right for self-determination and self-governance.</li> </ul>	Low
4	Construction of upgrades to the Anaconda and Painter Lake Forestry Access Roads	<ul style="list-style-type: none"> <li>• Right associated with Current and Historical Use of Lands and Resources for Traditional Purposes;</li> <li>• Right associated with Cultural Continuity;</li> <li>• Right associated with Socio-Economic, Health and Well-Being; and</li> <li>• Right associated with Self-Determination and Self-Governance.</li> </ul>	<p>Construction of upgrades to the Anaconda and Painter Lake Forestry Access Roads is assumed to temporally overlap with Project activities based on the information available. Activities associated with road development are predicted to have same pathways of effects as arising from the Project. This may include alteration of access to lands and resources used for cultural and spiritual purposes and related rights, loss and alteration of existing natural environment including traditional foods and harvesting areas, heightened substance abuse, reduced community</p>	<ul style="list-style-type: none"> <li>▪ Reduced ability to exercise harvesting rights;</li> <li>▪ Effects to the continuation and transmission of rights based cultural knowledge;</li> <li>▪ Effects to food security and health-related rights;</li> <li>▪ Effects to the right to culturally appropriate and accessible health care;</li> <li>▪ Effects to rights on social cohesion, well-being and quality of life;</li> </ul>	Moderate



ID	RFD or Activity	Potential Cumulative Effects	Spatial / Temporal Considerations and Effect Pathways	Potential Change	Relative Change in the RSA (%)
			safety, and impacts to community social, health and wellness rights.	<ul style="list-style-type: none"> <li>▪ Effects to rights related to social well-being and protection;</li> <li>▪ Effects to community health and wellness rights;</li> <li>▪ Effects to right for self-determination and self-governance; and</li> <li>▪ Effects to the Nation's strategic decision-making authority and right for self-determination and self-governance.</li> </ul>	
5	Wataynikaneyap Transmission Project (also known as New Transmission Line to Pickle Lake)	<ul style="list-style-type: none"> <li>• Right associated with Current and Historical Use of Lands and Resources for Traditional Purposes;</li> <li>• Right associated with Cultural Continuity</li> <li>▪ Right associated with Socio-Economic, Health and Well-Being; and</li> <li>▪ Right associated with Self-Determination and Self-Governance.</li> </ul>	The Wataynikaneyap Transmission Project is assumed to temporally overlap with Project activities based on the information available. Activities associated with road development are predicted to have same pathways of effects as arising from the Project. This may include alteration of access to lands and resources used for cultural and spiritual purposes and rights, loss and alteration of existing natural environment including traditional foods and harvesting areas, and impacts to community social, health and wellness rights.	<ul style="list-style-type: none"> <li>▪ Reduced ability to exercise harvesting rights;</li> <li>▪ Effects to the continuation and transmission of rights based cultural knowledge;</li> <li>▪ Effects to food security and health-related rights;</li> <li>▪ Effects to rights on social cohesion, well-being and quality of life;</li> <li>▪ Effects to rights related to social well-being and protection;</li> <li>▪ Effects to community health and wellness rights;</li> <li>▪ Effects to right for self-determination and self-governance; and</li> <li>▪ Effects to the Nation's strategic decision-making authority and right for self-determination and self-governance.</li> </ul>	Low



ID	RFD or Activity	Potential Cumulative Effects	Spatial / Temporal Considerations and Effect Pathways	Potential Change	Relative Change in the RSA (%)
8	<ul style="list-style-type: none"> <li>▪ Rapid Lynx Broadband Project (Phase 1)</li> </ul>	<ul style="list-style-type: none"> <li>• Right associated with Current and Historical Use of Lands and Resources for Traditional Purposes;</li> <li>• Right associated with Cultural Continuity;</li> <li>▪ Right associated with Socio-Economic, Health and Well-Being; and</li> <li>▪ Right associated with Self-Determination and Self-Governance.</li> </ul>	<p>The Rapid Lynx Broadband project (Phase 1) is assumed to temporally and spatially overlap with Project activities based on the information available. Activities associated with broadband development are predicted to have same pathways of effects as arising from the Project. This may include alteration of access to lands and resources used for cultural and spiritual purposes and rights, loss and alteration of existing natural environment including traditional foods and harvesting areas, and impacts to community social, health and wellness rights.</p>	<ul style="list-style-type: none"> <li>▪ Reduced ability to exercise harvesting rights;</li> <li>▪ Effects to the continuation and transmission of rights based cultural knowledge;</li> <li>▪ Effects to food security and health-related rights;</li> <li>▪ Effects to rights on social cohesion, well-being and quality of life;</li> <li>▪ Effects to rights related to social well-being and protection;</li> <li>▪ Effects to community health and wellness rights;</li> <li>▪ Effects to right for self-determination and self-governance; and</li> <li>▪ Effects to the Nation's strategic decision-making authority and right for self-determination and self-governance.</li> </ul>	Low
11	<p>Webequie First Nation – Nursing Station Bulk Fuel Storage Upgrades</p>	<ul style="list-style-type: none"> <li>• Right associated with Current and Historical Use of Lands and Resources for Traditional Purposes;</li> <li>• Right associated with Cultural Continuity;</li> <li>▪ Right associated with Socio-Economic, Health and Well-Being; and</li> <li>▪ Right associated with Self-Determination and Self-Governance.</li> </ul>	<p>Webequie First Nation's Nursing Station Bulk Fuel Storage Upgrades will temporally and spatially overlap with Project activities as it's currently in operation. Activities associated with the decommissioning of old fuel storage and the installation of the new fuel storage have similar pathways of effects as those arising from the Project. This may include impacts to community social, health and wellness rights.</p>	<ul style="list-style-type: none"> <li>▪ Effects to the continuation and transmission of rights based cultural knowledge;</li> <li>▪ Effects to food security and health-related rights;</li> <li>▪ Effects to rights on social cohesion, well-being and quality of life;</li> <li>▪ Effects to rights related to social well-being and protection; and</li> <li>▪ Effects to community health and wellness rights.</li> </ul>	Low



ID	RFD or Activity	Potential Cumulative Effects	Spatial / Temporal Considerations and Effect Pathways	Potential Change	Relative Change in the RSA (%)
19	Black Horse Project and Big Daddy Project	<ul style="list-style-type: none"> <li>• Right associated with Current and Historical Use of Lands and Resources for Traditional Purposes;</li> <li>• Right associated with Cultural Continuity;</li> <li>▪ Right associated with Socio-Economic, Health and Well-Being; and</li> <li>▪ Right associated with Self-Determination and Self-Governance.</li> </ul>	<p>The Black Horse and Big Daddy mining projects may potentially temporally and spatially overlap with Project activities. Activities associated with road development are predicted to have same pathways of effects as arising from the Project. This may include alteration of access to lands and resources used for cultural and spiritual purposes and related rights, loss and alteration of existing natural environment including traditional foods and harvesting areas, heightened substance abuse, reduced community safety, and impacts to community social, health and wellness rights.</p>	<ul style="list-style-type: none"> <li>▪ Reduced ability to exercise harvesting rights;</li> <li>▪ Effects to the continuation and transmission of rights based cultural knowledge;</li> <li>▪ Effects to food security and health-related rights;</li> <li>▪ Effects to rights on social cohesion, well-being and quality of life;</li> <li>▪ Effects to rights related to social well-being and protection;</li> <li>▪ Effects to community health and wellness rights;</li> <li>▪ Effects to right for self-determination and self-governance; and</li> <li>▪ Effects to the Nation's strategic decision-making authority and right for self-determination and self-governance.</li> </ul>	Moderate
20	Eagle's Nest Project	<ul style="list-style-type: none"> <li>• Right associated with Current and Historical Use of Lands and Resources for Traditional Purposes;</li> <li>• Right associated with Cultural Continuity;</li> <li>▪ Right associated with Socio-Economic, Health and Well-Being; and</li> <li>▪ Right associated with Self-Determination and Self-Governance.</li> </ul>	<p>The Eagle's Nest Project will temporally and spatial overlap with Project activities. Activities associated with potential future mine development have similar pathways of effects as those arising from the Project. This may include alteration of access to lands and resources used for cultural and spiritual purposes and related rights, loss and alteration of existing natural environment including traditional foods and harvesting areas, heightened substance abuse, reduced community safety, and impacts to community social, health and wellness rights.</p>	<ul style="list-style-type: none"> <li>▪ Reduced ability to exercise harvesting rights;</li> <li>▪ Effects to the continuation and transmission of rights based cultural knowledge;</li> <li>▪ Effects to food security and health-related rights;</li> <li>▪ Effects to rights on social cohesion, well-being and quality of life;</li> <li>▪ Effects to rights related to social well-being and protection;</li> <li>▪ Effects to community health and wellness rights;</li> </ul>	Moderate



ID	RFD or Activity	Potential Cumulative Effects	Spatial / Temporal Considerations and Effect Pathways	Potential Change	Relative Change in the RSA (%)
				<ul style="list-style-type: none"> <li>▪ Effects to right for self-determination and self-governance; and</li> <li>▪ Effects to the Nation's strategic decision-making authority and right for self-determination and self-governance.</li> </ul>	
21	Marten Falls Community Access Road Project	<ul style="list-style-type: none"> <li>• Right associated with Current and Historical Use of Lands and Resources for Traditional Purposes;</li> <li>• Right associated with Cultural Continuity;</li> <li>▪ Right associated with Socio-Economic, Health and Well-Being; and</li> <li>▪ Right associated with Self-Determination and Self-Governance.</li> </ul>	<p>The Marten Falls Community Access Road will temporally and spatially overlap with Project activities based on current information and proposed development timeline. Activities associated with road development have same pathways of effects as those arising from the Project. This may include alteration of access to lands and resources used for cultural and spiritual purposes and related rights, loss and alteration of existing natural environment including traditional foods and harvesting areas, heightened substance abuse, reduced community safety, and impacts to community social, health and wellness rights.</p>	<ul style="list-style-type: none"> <li>▪ Reduced ability to exercise harvesting rights;</li> <li>▪ Effects to the continuation and transmission of rights based cultural knowledge;</li> <li>▪ Effects to food security and health-related rights;</li> <li>▪ Effects to the right to culturally appropriate and accessible health care;</li> <li>▪ Effects to rights on social cohesion, well-being and quality of life;</li> <li>▪ Effects to rights related to social well-being and protection;</li> <li>▪ Effects to community health and wellness rights;</li> <li>▪ Effects to right for self-determination and self-governance; and</li> <li>▪ Effects to the Nation's strategic decision-making authority and right for self-determination and self-governance.</li> </ul>	Moderate



ID	RFD or Activity	Potential Cumulative Effects	Spatial / Temporal Considerations and Effect Pathways	Potential Change	Relative Change in the RSA (%)
22	Northern Road Link Project	<ul style="list-style-type: none"> <li>• Right associated with Current and Historical Use of Lands and Resources for Traditional Purposes;</li> <li>• Right associated with Cultural Continuity</li> <li>▪ Right associated with Socio-Economic, Health and Well-Being; and</li> <li>▪ Right associated with Self-Determination and Self-Governance.</li> </ul>	<p>The Northern Road Link will temporally and spatially overlap with Project activities based on current information and proposed development timeline. Activities associated with road development have same pathways of effects as those arising from the Project. This may include alteration of access to lands and resources used for cultural and spiritual purposes and related rights, loss and alteration of existing natural environment including traditional foods and harvesting areas, heightened substance abuse, reduced community safety, and impacts to community social, health and wellness rights.</p>	<ul style="list-style-type: none"> <li>▪ Reduced ability to exercise harvesting rights;</li> <li>▪ Effects to the continuation and transmission of rights based cultural knowledge;</li> <li>▪ Effects to food security and health-related rights;</li> <li>▪ Effects to the right to culturally appropriate and accessible health care;</li> <li>▪ Effects to rights on social cohesion, well-being and quality of life;</li> <li>▪ Effects to rights related to social well-being and protection;</li> <li>▪ Effects to community health and wellness rights;</li> <li>▪ Effects to right for self-determination and self-governance; and</li> <li>▪ Effects to the Nation's strategic decision-making authority and right for self-determination and self-governance.</li> </ul>	Moderate
24	East-West Road	<ul style="list-style-type: none"> <li>• Right associated with Current and Historical Use of Lands and Resources for Traditional Purposes;</li> <li>• Right associated with Cultural Continuity;</li> <li>▪ Right associated with Socio-Economic, Health and Well-Being; and</li> <li>▪ Right associated with Self-Determination and Self-Governance.</li> </ul>	<p>Based on current information and proposed development timelines, it is anticipated that the East-West Road project could potentially overlap temporally, and spatially with Project activities. Activities associated with current and future road development have similar pathways of effects as those arising from the Project. This may include alteration of access to lands and resources used for cultural and spiritual purposes and related rights, loss and alteration of existing natural environment including</p>	<ul style="list-style-type: none"> <li>▪ Reduced ability to exercise harvesting rights;</li> <li>▪ Effects to the continuation and transmission of rights based cultural knowledge;</li> <li>▪ Effects to food security and health-related rights;</li> <li>▪ Effects to the right to culturally appropriate and accessible health care;</li> </ul>	Moderate



ID	RFD or Activity	Potential Cumulative Effects	Spatial / Temporal Considerations and Effect Pathways	Potential Change	Relative Change in the RSA (%)
			<p>traditional foods and harvesting areas, heightened substance abuse, reduced community safety, and impacts to community social, health and wellness rights.</p>	<ul style="list-style-type: none"> <li>▪ Effects to rights on social cohesion, well-being and quality of life;</li> <li>▪ Effects to rights related to social well-being and protection;</li> <li>▪ Effects to community health and wellness rights;</li> <li>▪ Effects to right for self-determination and self-governance; and</li> <li>▪ Effects to the Nation's strategic decision-making authority and right for self-determination and self-governance.</li> </ul>	
27	Rapid Lynx Broadband Project (Phase 2)	<ul style="list-style-type: none"> <li>• Right associated with Current and Historical Use of Lands and Resources for Traditional Purposes;</li> <li>• Right associated with Cultural Continuity;</li> <li>▪ Right associated with Socio-Economic, Health and Well-Being; and</li> <li>▪ Right associated with Self-Determination and Self-Governance.</li> </ul>	<p>The Rapid Lynx Broadband project (Phase 2) is assumed to temporally and spatially overlap with Project activities based on the information available. Activities associated with broadband development are predicted to have same pathways of effects as arising from the Project. This may include alteration of access to lands and resources used for cultural and spiritual purposes and rights, loss and alteration of existing natural environment including traditional foods and harvesting areas, and impacts to community social, health and wellness rights.</p>	<ul style="list-style-type: none"> <li>▪ Reduced ability to exercise harvesting rights;</li> <li>▪ Effects to the continuation and transmission of rights based cultural knowledge;</li> <li>▪ Effects to food security and health-related rights;</li> <li>▪ Effects to rights on social cohesion, well-being and quality of life;</li> <li>▪ Effects to rights related to social well-being and protection;</li> <li>▪ Effects to community health and wellness rights;</li> <li>▪ Effects to right for self-determination and self-governance; and</li> <li>▪ Effects to the Nation's strategic decision-making authority and right for self-determination and self-governance.</li> </ul>	Low



ID	RFD or Activity	Potential Cumulative Effects	Spatial / Temporal Considerations and Effect Pathways	Potential Change	Relative Change in the RSA (%)
30	Juno Corporation Mining Exploration Activity	<ul style="list-style-type: none"> <li>• Right associated with Current and Historical Use of Lands and Resources for Traditional Purposes;</li> <li>• Right associated with Cultural Continuity;</li> <li>▪ Right associated with Socio-Economic, Health and Well-Being; and</li> <li>▪ Right associated with Self-Determination and Self-Governance.</li> </ul>	<p>The Juno Corporation Mining Exploration Activities are assumed to temporally and spatially overlap with Project activities based on the information available. Activities associated with any ongoing mineral exploration or potential future mine development have similar pathways of effects as those arising from the Project. This may include alteration of access to lands and resources used for cultural and spiritual purposes and related rights, loss and alteration of existing natural environment including traditional foods and harvesting areas, heightened substance abuse, reduced community safety, and impacts to community social, health and wellness rights.</p>	<ul style="list-style-type: none"> <li>▪ Reduced ability to exercise harvesting rights;</li> <li>▪ Effects to the continuation and transmission of rights based cultural knowledge;</li> <li>▪ Effects to food security and health-related rights;</li> <li>▪ Effects to rights on social cohesion, well-being and quality of life;</li> <li>▪ Effects to rights related to social well-being and protection;</li> <li>▪ Effects to community health and wellness rights;</li> <li>▪ Effects to right for self-determination and self-governance; and</li> <li>▪ Effects to the Nation's strategic decision-making authority and right for self-determination and self-governance.</li> </ul>	Moderate
31	Northern Star Eagle Limited and Southern Star Eagle Limited Drilling Program	<ul style="list-style-type: none"> <li>• Right associated with Current and Historical Use of Lands and Resources for Traditional Purposes;</li> <li>• Right associated with Cultural Continuity;</li> <li>▪ Right associated with Socio-Economic, Health and Well-Being; and</li> <li>▪ Right associated with Self-Determination and Self-Governance.</li> </ul>	<p>Northern Star Eagle Limited and Southern Star Eagle Limited Drilling Program are assumed to temporally and spatially overlap with Project activities based on the information available. Activities associated with any ongoing mineral exploration or potential future mine development have similar pathways of effects as those arising from the Project. This may include alteration of access to lands and resources used for cultural and spiritual purposes and related rights, loss and alteration of existing natural environment including traditional foods and harvesting areas, heightened substance abuse, reduced</p>	<ul style="list-style-type: none"> <li>▪ Reduced ability to exercise harvesting rights;</li> <li>▪ Effects to the continuation and transmission of rights based cultural knowledge;</li> <li>▪ Effects to food security and health-related rights;</li> <li>▪ Effects to rights on social cohesion, well-being and quality of life;</li> <li>▪ Effects to rights related to social well-being and protection;</li> <li>▪ Effects to community health and wellness rights;</li> </ul>	Moderate



ID	RFD or Activity	Potential Cumulative Effects	Spatial / Temporal Considerations and Effect Pathways	Potential Change	Relative Change in the RSA (%)
			community safety, and impacts to community social, health and wellness rights.	<ul style="list-style-type: none"> <li>▪ Effects to right for self-determination and self-governance; and</li> <li>▪ Effects to the Nation's strategic decision-making authority and right for self-determination and self-governance.</li> </ul>	
37 38 39	<p>Transportation of ore from future development near the Project for processing, once past the Webequie Supply Road, potentially involving the following:</p> <ul style="list-style-type: none"> <li>▪ Ferrochrome Production Facility (proposed); and</li> <li>▪ Sudbury Smelter (existing).</li> </ul> <p>Road from Nakina to Ferrochrome Facility and Sudbury Smelter (existing)</p>	<ul style="list-style-type: none"> <li>• Right associated with Current and Historical Use of Lands and Resources for Traditional Purposes;</li> <li>• Right associated with Cultural Continuity;</li> <li>▪ Right associated with Socio-Economic, Health and Well-Being; and</li> <li>▪ Right associated with Self-Determination and Self-Governance.</li> </ul>	The transportation of ore from future development near the Project for processing will spatially overlap with Project activities; however, the temporal overlap is uncertain based on the current information and status of the development. Activities associated with any potential future mine material transportation have similar pathways of effects as those arising from the Project. This may include alteration of access to lands and resources used for cultural and spiritual purposes and related rights, loss and alteration of existing natural environment including traditional foods and harvesting areas, heightened substance abuse, reduced community safety, and impacts to community social, health and wellness rights.	<ul style="list-style-type: none"> <li>▪ Reduced ability to exercise harvesting rights;</li> <li>▪ Effects to the continuation and transmission of rights based cultural knowledge;</li> <li>▪ Effects to food security and health-related rights;</li> <li>▪ Effects to rights on social cohesion, well-being and quality of life;</li> <li>▪ Effects to rights related to social well-being and protection;</li> <li>▪ Effects to community health and wellness rights;</li> <li>▪ Effects to right for self-determination and self-governance; and</li> <li>▪ Effects to the Nation's strategic decision-making authority and right for self-determination and self-governance.</li> </ul>	Moderate
-	Winter Roads - Increased winter road traffic by future mining proponents	<ul style="list-style-type: none"> <li>• Right associated with Current and Historical Use of Lands and Resources for Traditional Purposes;</li> <li>• Right associated with Cultural Continuity;</li> </ul>	The Winter Roads – Increased winter road traffic by future mining proponents is assumed to temporally and spatially overlap with Project activities based on the information available. Activities associated with current and future winter road maintenance have similar pathways of	<ul style="list-style-type: none"> <li>▪ Reduced ability to exercise harvesting rights;</li> <li>▪ Effects to the continuation and transmission of rights based cultural knowledge;</li> <li>▪ Effects to food security and health-related rights;</li> </ul>	Moderate



ID	RFD or Activity	Potential Cumulative Effects	Spatial / Temporal Considerations and Effect Pathways	Potential Change	Relative Change in the RSA (%)
		<ul style="list-style-type: none"> <li>▪ Right associated with Socio-Economic, Health and Well-Being; and</li> <li>▪ Right associated with Self-Determination and Self-Governance.</li> </ul>	<p>effects as those arising from the Project.</p> <p>This may include alteration of access to lands and resources used for cultural and spiritual purposes and related rights, loss and alteration of existing natural environment including traditional foods and harvesting areas, and impacts to community social, health and wellness rights.</p>	<ul style="list-style-type: none"> <li>▪ Effects to rights on social cohesion, well-being and quality of life;</li> <li>▪ Effects to rights related to social well-being and protection;</li> <li>▪ Effects to community health and wellness rights;</li> <li>▪ Effects to right for self-determination and self-governance; and</li> <li>▪ Effects to the Nation's strategic decision-making authority and right for self-determination and self-governance.</li> </ul>	
-	Climate Change	<ul style="list-style-type: none"> <li>• Right associated with Current and Historical Use of Lands and Resources for Traditional Purposes;</li> <li>• Right associated with Cultural Continuity;</li> <li>▪ Right associated with Socio-Economic, Health and Well-Being; and</li> <li>▪ Right associated with Self-Determination and Self-Governance.</li> </ul>	<p>Severe weather events (such as storms, flooding, and unpredictable freeze/ thaw cycles) can damage or render roads and infrastructure impassable. For remote communities, this can mean isolation from essential services, supplies, and emergency response.</p> <p>Severe weather can disrupt cultural and socio-economic and cultural conditions which are important for maintaining and continuing social and cultural cohesion in remote communities. When combined with Project effects such as altered land use or increased non-local presence, these disruptions can lead to impacts to rights on social cohesion, well-being and quality of life, continuation and transmission of rights based cultural knowledge, and food security and health-related rights.</p>	<ul style="list-style-type: none"> <li>▪ Reduced ability to exercise harvesting rights;</li> <li>▪ Effects to the continuation and transmission of rights based cultural knowledge;</li> <li>▪ Effects to food security and health-related rights;</li> <li>▪ Effects to rights on social cohesion, well-being and quality of life;</li> <li>▪ Effects to rights related to social well-being and protection;</li> <li>▪ Effects to community health and wellness rights;</li> <li>▪ Effects to right for self-determination and self-governance; and</li> <li>▪ Effects to the Nation's strategic decision-making authority and right for self-determination and self-governance.</li> </ul>	Moderate



## 7.6 Mitigation for Cumulative Effects on Rights

Mitigation and enhancement measures for the Project are described in **Section 6.5**. There are potential cumulative effects with other RFDs near the Project including the risk of compounding effects on health, well-being and cultural continuity. Webequie First Nation and proponents of the RFDs should consider broader strategies that anticipate long-term pressures and effects of external factors. The Project's CRP provides an essential framework for supporting coordinated, long-term planning (see Appendix N of the Final EAR/IS) and for managing potential adverse cumulative effects.

The following sections of the Final EAR/IS outline the proposed mitigation measures for effects on the biophysical environment, cultural and socio-economic environs, and on lands and resources, including Geology, Terrain, and Soils (Section 6.4); Surface Water Resources (Section 7.4); Groundwater Resources (Section 8.4); Atmospheric Environment (Section 9.4); Fish and Fish Habitat (Section 10.4); Vegetation and Wetlands (Section 11.4); Wildlife and Wildlife Habitat (Section 12.4); Species at Risk (Section 13.4); Social Environment (Section 14.4); Economic Environment (Section 15.4); Human Health (Section 17.4); Visual Environment (Section 18.4); Cultural Heritage Resources (Section 20.4); Follow-up and Monitoring (Section 22); Accidents and Malfunctions (Section 23); as well as the mitigation measures provided in Appendix E.

Implementing coordinated mitigation and enhancement measures across multiple projects, along with ongoing monitoring, is expected to lessen the overall cumulative risk on Aboriginal and Treaty Rights. Therefore, the identified cumulative effects are considered net cumulative effects and are discussed in the following subsection.

## 7.7 Characterization of Net Cumulative Effects on Rights

The net cumulative effects on the Aboriginal and Treaty Rights are characterized using the criteria defined in **Section 7**. These criteria considered for the cumulative effects assessment included the likelihood of effects occurring, their geographic extent, frequency and duration, reversibility, implications for cultural well-being and health, the cumulative nature of the impacts, as well as governance factors and impact equity.

Net cumulative effects on changes to the Aboriginal and Treaty Rights with respect to Webequie First Nation are predicted to be adverse in direction, moderate in magnitude, medium in geographic extent, and long-term in duration, based on the current understanding of cumulative effects on rights by the Project Team as per the information received from Webequie First Nation's Rights Assessment (Stantec Inc, 2025). Based on the Project Team's current understanding of the other LSA and RSA communities' concerns, information that have been provided by the communities, and current understanding of the Project and RFDs effects, it is anticipated that the net cumulative effects on these rights have a low to moderate level of effect for the LSA and the RSA communities.

Changes in Aboriginal and Treaty Rights will require mitigations to be progressively developed and adapted over a long-term period. The effects, as identified by Webequie First Nation in their rights assessment (Stantec Inc., 2025), will be frequent throughout each Project's development; and these changes will be irreversible for impacts to Rights associated with Cultural Continuity and reversible for Rights associated with Socio-Economic, Health and Well-Being.

The current prediction of cumulative effects is mainly based on a review of assessment of Webequie First Nation's Cumulative Rights Assessment (Stantec Inc, 2025) showing that the WSR may interact with other regional developments to influence Indigenous harvesting, access, cultural continuity, socio-economic conditions, and self-governance. Overall, cumulative effects on harvesting and access are considered low for Webequie First Nation due to the relatively undisturbed environment and limited overlap with other projects, though communities raised concerns about future mining, drinking water quality, climate change, and potential regulatory barriers to land use. Cultural and experiential rights may face low cumulative effects during construction but moderate impacts during operations as additional regional roads increase outsider access and social pressures. Socio-economic and well-being-related cumulative effects are also low during construction but moderate during operations due to combined economic opportunities and social risks associated with road network expansion.

It is anticipated that the other LSA and RSA Indigenous communities will experience **Low to Moderate** cumulative impacts across several rights areas, including rights associated with the current and historical use of lands and resources for traditional purposes, cultural continuity, socio-economic conditions, health, and overall well-being, and self-determination and self-governance. This assessment is based on the information provided to the Project Team to-date, with consideration of proposed mitigation and enhancement measures, and it reflects current predictions made with information available.

EAR//IS review by other LSA and RSA communities to-date highlights broader concerns, including the asserted need for a more comprehensive cumulative effects assessment that includes foreseeable mining, hydropower, and transmission projects; improved rights-based impact pathways; accurate mapping of traditional territories; integration of Indigenous Knowledge; stronger governance and access-control commitments; climate-related risk assessment; and co-developed mitigation, monitoring, and adaptive management programs. Effects on self-determination and governance remain a concern, with First Nations emphasizing existing colonial pressures, inadequate consultation, uncertainty around road ownership and regulation, and the need for respect for Indigenous laws and decision-making authority. Several Nations stress that key mitigation and monitoring plans remain undefined, and many issues including FPIC, economic participation, and long-term regional cumulative effects must be addressed collaboratively in future Project phases. Please refer to Appendix A of this addendum for information on the concerns from LSA and RSA communities considered for the cumulative rights assessment.

## 7.8 Follow-up and Monitoring

### 7.8.1 Proponent-Led Measures

The following measures represent the proponent's commitments to avoid, reduce, or otherwise address potential impacts on Aboriginal and Treaty Rights. They reflect the information shared to-date by participating Indigenous Nations and remain subject to further refinement through continued collaboration:

- The CRP is the proponent's framework to leverage positive effects, minimize negative effects, and monitor social, economic, health, land use, cultural continuity, and cultural heritage conditions for Webequie First Nation and LSA/RSA communities during construction and operations.
- A Community Readiness Working Group (CRWG) led by Webequie First Nation as proponent will oversee implementation, monitoring, adaptive management, and dialogue.
- The CRWG will establish sub-working groups (e.g., health and social well-being; education, employment and training; business development; environmental stewardship and land use; cultural and traditional practices).



- Community Liaison Officer(s) (CLO) will provide regular updates, facilitate Questions and Answers (Q&A), serve as first point of contact for grievances, and support knowledge sharing and capacity building.
- The Contractor's Code of Conduct will guide workforce behaviour; CRWG/CLO roles and conflict resolution protocols will be set out in a Terms of Reference (ToR).
- All measures are aligned with Webequie First Nation's CCP, the Three-Tier Model, and the seven directions/goals, and consolidate relevant Final EAR/IS mitigation/enhancement commitments (Sections 14-20).

See Appendix N of the Final EAR/IS for more details on the CRP.

Mitigation measures proposed to address potential effects on the biophysical environment and on lands and resources, and socio-economic, health and well-being are detailed in the following sections of the Final EAR/IS:

- Geology, Terrain, and Soils (Section 6.4)
- Surface Water Resources (Section 7.4)
- Groundwater Resources (Section 8.4)
- Atmospheric Environment (Section 9.4)
- Fish and Fish Habitat (Section 10.4)
- Vegetation and Wetlands (Section 11.4)
- Wildlife and Wildlife Habitat (Section 12.4)
- Species at Risk (Section 13.4)
- Social Environment (Section 14.4)
- Economic Environment (Section 15.4)
- Non-Traditional Land and Resource Use (Section 16.4)
- Human Health (Section 17.4)
- Visual Environment (Section 18.4)
- Follow-Up and Monitoring (Section 22)
- Accidents and Malfunctions (Section 23)
- Appendix E: Mitigation Measures
- Appendix N Community Readiness Plan
- Appendix Q Health Impact Assessment Report

The Construction Environmental Management Plan (CEMP) (Section 4 and Appendix E of the Final EAR/IS) outlines predicted effects on the biophysical environment, the associated mitigation measures, and the monitoring requirements for the construction phase of the Project. It serves as the primary document guiding how environmental impacts will be managed during construction.

The Operation Environmental Management Plan Framework (OEMP) (Section 4 and Appendix E of the Final EAR/IS) provides direction for managing biophysical effects during the operations and maintenance phase. As part of the OEMP, additional component-specific management plans will be developed as needed for the operational stage of the Project.



## 7.8.2 Indigenous Participation and Monitoring

Indigenous participation and monitoring for the Project centres on the CRP and an independent, community-led Community Well-Being Monitoring Program originally developed by Webequie First Nation. The program tracks changes in community well-being resulting from the Project and guides adaptive management decisions through the CRWG.

Monitoring builds on the Webequie First Nation Community Well-Being Baseline Study (2014), which identified indicators related to social, economic, health, land use, governance, culture, and traditional practices. These indicators will continue to be used to understand changes during construction and operations. Monitoring may also extend to other LSA/RSA communities where appropriate.

The Monitoring and Adaptive Management Plan will track similar indicators as those developed from the 2014 Community Well-Being Study prepared for Webequie First Nation. Adaptive management is a central feature: actions are implemented, assessed through feedback (surveys, tracking, interviews, etc.), and adjusted to remain responsive to changing conditions.

These elements reflect desired outcomes or conceptual intentions, but require further definition, agreement, or capacity beyond what is currently specified:

- Expansion of community well-being monitoring to other LSA and RSA communities (subject to interest and collaboration).
- Long-term community-driven enhancements to social, economic, cultural, and environmental well-being.
- Evolving adaptive management structures to continually reflect changing community needs.
- Ongoing refinement of monitoring methods and indicators beyond those in the 2014 baseline study.
- Broader partnerships among Webequie First Nation, neighbouring communities, and external third parties.

See Appendix N of the Final EAR/IS for more details.

## 7.8.3 Matters Requiring Crown Determination

Several key matters identified through this assessment require explicit determination by the Crown, as they fall outside the scope of proponent-led processes and rest directly with federal and provincial authorities in fulfilling their constitutional and policy obligations. These include the Crown's responsibility to evaluate whether consultation to-date meets the standards of adequacy, including whether communities have had meaningful, timely, and culturally appropriate opportunities to understand the Project and express their positions. The Crown must also determine what accommodation measures are required to address potential impacts on Aboriginal and Treaty Rights, including whether proponent-proposed mitigations are adequate or whether additional, Crown-directed accommodations are necessary.

## 7.8.4 Ongoing Dialogue

Beyond the completion of this EAR/IS, it is proposed that ongoing, community-driven dialogue takes place as part of the CRP, which will develop and implement key strategies with communities. Continued engagement with Webequie First Nation and with other LSA and RSA communities throughout the construction and operations phases will be essential to ensure the Project reflects community-defined values, concerns and aspirations for communities.



## 8 Conclusions

The addendum discusses the Project effects which may affect Aboriginal and Treaty Rights. While Webequie First Nation provided an Indigenous and Treaty Rights Impact Assessment, other LSA and RSA communities have not provided one at this time. It is understood that the Project may affect exercise of Aboriginal and Treaty Rights, including current and historical use of lands and resources for traditional purposes, cultural continuity, socio-economic, health and well-being, and self-determination and self-governance. The EAR/IS recommends route refinements and site avoidance where possible, cultural heritage protocols and Indigenous-led monitors, checkpoints and access controls to discourage trespass, dust and noise controls, a traffic safety plan, and targeted investments in language and cultural programs and land-based learning to reduce effects. These measures will be organized and tracked through a CRP and ongoing monitoring led with the communities and can be adapted as conditions change.

Based on the Addendum, severity characterization of Project effects on Aboriginal and Treaty Rights applies a qualitative framework (low, moderate, high) that considers likelihood, geographic extent, duration and reversibility, cultural well-being, health, governance, equity, and cumulative context, with the highest single severity rating driving the overall characterization. For the Project, low to moderate severity effects are identified primarily for Webequie First Nation in relation to harvesting, access, cultural continuity, and socio-economic, health, and well-being, reflecting a high likelihood of effects, moderate geographic extent (largely within the LSA), long duration due to the permanent nature of the road, and uneven effects on vulnerable subgroups; effects for other LSA and RSA communities are generally characterized as low or moderate severity, given reduced proximity and effect pathways, using information available.

Net cumulative effects consider interactions with past, existing, and reasonably foreseeable developments (e.g., Ring of Fire mining proposals, other road projects, forestry, and climate change). Net cumulative effects on Aboriginal and Treaty Rights for Webequie First Nation are predicted to be adverse, moderate, medium in extent, and long-term (Stantec Inc., 2025). For other LSA and RSA communities, cumulative effects on Aboriginal and Treaty Rights are anticipated to be low to moderate, affecting traditional land and resource use, cultural continuity, socio-economic conditions, health, well-being, and self-governance based on provided information.

## 9 References

Final Environmental Assessment Report/Impact Statement for the Webequie Supply Road. Available: <https://www.supplyroad.ca/finalea/>

Firelight Research Inc and Fort Albany First Nation. (2024). Fort Albany First Nation Knowledge and Use Study for the Proposed Webequie Supply Road. Internal Document Review

Fullman, T.J., Joly, K., Gustine, D.D. et al. Behavioral responses of migratory caribou to semi-permeable roads in Arctic Alaska. *Sci Rep* 15, 24712 (2025). Available: <https://doi.org/10.1038/s41598-025-10216-6>

Government of Canada, 2025. United Nations Declaration on the Rights of Indigenous Peoples Act. Available: <https://www.justice.gc.ca/eng/declaration/ap-pa/index.html>

Impact Assessment Agency of Canada (IAAC). (2020). Webequie Supply Road Project Tailored Impact Statement Guidelines. Available: <https://iaac-aeic.gc.ca/050/documents/p80183/133938E.pdf>.

Impact Assessment Agency of Canada (IAAC). 2024. Guidance: Assessment of potential impacts on the rights of Indigenous Peoples. Government of Canada. Available: <https://www.canada.ca/en/impact-assessment-agency/services/policy-guidance/practitioners-guide-impact-assessment-act/guidance-assessment-potential-impacts-rights-indigenous-peoples.html>

Impact Assessment Agency of Canada (IAAC). 2025. Policy Context: Assessment of Potential Impacts on the Rights of Indigenous Peoples. Available: <https://www.canada.ca/en/impact-assessment-agency/services/policy-guidance/practitioners-guide-impact-assessment-act/assessment-potential-impacts-rights-indigenous-peoples.html>

MNP LLP. N.D. Kashechewan First Nation Existing Conditions Report, Webequie Supply Road Project. Internal Document Review.

MNP LLP. N.D. Weenusk First Nation Existing Conditions Report. Internal Document Review.

Stantec Inc. 2024. Webequie First Nation Indigenous Knowledge Study for the Webequie Supply Road. Interim Report. Prepared by Stantec Consulting Ltd. October 4, 2024. Internal Document Review

Stantec Inc. 2025. Webequie First Nation Indigenous and Treaty Rights Impact Assessment for the Webequie Supply Road. Internal Document Review

Suslop Inc. (2024). Marten Falls First Nation Indigenous Knowledge, Land Use and Occupancy Study for the Northern Access Roads. Proposed Webequie Supply Road Project. Internal Document Review

United Nations. 2007. United Nations Declaration on the Rights of Indigenous Peoples: resolution / adopted by the General Assembly. Retrieved August 15, 2025. Available: <https://digitallibrary.un.org/record/606782?v=pdf>

Webequie First Nation. 2023. Webequie First Nation Comprehensive Community Plan. Internal Document Review.



# APPENDIX A

Supplemental Responses to  
Comments on Assessment of Effects  
on Indigenous Peoples



**Table 1: Comments Received on the Draft EAR/IS Addressed by the Addendum**

First Nation / Stakeholder	Comment Received	Concern	Response	Addressed Section
Weenusk First Nation	Comment Response Table (CRT) for Draft EAR/IS	The Project could cause significant impacts to Weenusk First Nation's lands, resources, and community well-being, while many key Project details and mitigation measures are still undetermined. As important studies, design decisions, and environmental management plans are incomplete, Weenusk First Nation believes the current assessment does not adequately address potential harms to their valued components, particularly Species at Risk, water, and community health and therefore does not meet their expectations for proper mitigation or protection of their rights and territory.	The WSR Project Team is committed to working collaboratively with other First Nations during the current EA/IA phase and future development phases of the Project. Mitigation and monitoring measures identified during the EA/IA will be further developed in the Construction Environmental Management Plan (CEMP) and Operations Environmental Management Plan (OEMP) for implementation. In the spirit of collaboration, draft copies of the CEMP and OEMP will be provided to WEFN to receive their feedback. The WSR Project Team welcomes the opportunity to have ongoing community-to-community dialogue to discuss WEFN's governance and rights to manage resources within the WFN and WEFN shared traditional areas.	Appendix B - Section 1.3 (Predicted Net Effects)
Attawapiskat First Nation	CRT for Draft EAR/IS Comment #2	The cumulative effects of the Project are not being properly assessed. Reasonably foreseeable induced development, especially mining and connected road infrastructure into the Ring of Fire must be included now, not deferred to a later regional assessment. Post-construction committees cannot replace a fully scoped cumulative effects analysis, which is essential for understanding how multiple waves of industrial development enabled by this road will impact their rights and territory. The road cannot function as a stand-alone project and will inevitably open their lands to significant mining activity, making it critical that all associated impacts be evaluated upfront.	A regional cumulative effects assessment is outside the scope of the approved provincial Terms of Reference and federal TISG, and neither assessment law requires proponents to conduct one. Attawapiskat First Nation's concerns are acknowledged but this issue must be addressed directly with Ontario and Canada. Any future Ring of Fire projects would undergo their own assessments, where cumulative effects can be reviewed case by case.	Appendix B - Section 1.4 (Cumulative Effects)
Attawapiskat First Nation	CRT for Draft EAR/IS Comment #3	The cumulative effects analysis does not follow the TISG requirements and is too narrowly scoped to be meaningful. By considering only projects that overlap with the road's "net effects" as a stand-alone project, the methodology excludes reasonably foreseeable developments that must be assessed.	This is considered outside the scope of the approved provincial Terms of Reference and federal TISG. The cumulative effects approach is based on overlap between the road's residual effects and those of other developments within each project's regional	Addendum Section 7 (Cumulative Effects on Indigenous Rights)

First Nation / Stakeholder	Comment Received	Concern	Response	Addressed Section
		This approach contradicts TISG guidance that cumulative effects boundaries must extend beyond the Project footprint and that even minor project effects can contribute to significant cumulative impacts. The reliance on simple qualitative ratings rather than ecological pathways further weakens the analysis. In its current form, the cumulative effects assessment does not provide an understanding of how the road will impact inherent and Treaty rights.	study area, and overlap is not expected beyond the WSR's defined boundaries. An updated evaluation of cumulative effects incorporating the assessment of impacts on Indigenous Peoples and the exercise of Aboriginal and Treaty rights will be provided in the Final EAR/IS addenda. The cumulative effects work will continue to be developed collaboratively and iteratively with Indigenous communities where appropriate and feasible.	
Attawapiskat First Nation	CRT for Draft EAR/IS Comment #5	The cumulative effects analysis must include eastern migratory caribou as a distinct and endangered population, rather than substituting forest-dwelling boreal caribou. The road would pass directly through habitat used by this ecotype, as confirmed by collaring data, yet the cumulative effects section omits them entirely. Eastern migratory caribou have unique life histories, vulnerabilities, and climate-related stressors that require separate assessment. Without a full analysis of impacts on this culturally and spiritually significant population, it is not possible to understand how the Project will affect rights.	Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the review period.	Appendix B - Section 1.3 (Predicted Net Effects)
Attawapiskat First Nation	CRT for Draft EAR/IS Comment #7	The cumulative effects analysis must include foreseeable hydroelectric and transmission developments on the Attawapiskat and Albany Rivers, as these projects would directly affect water, fish habitat, wildlife, wetlands, and traditional land use that are integral to the exercise of inherent and Treaty rights. Treating these developments only as a "social" issue and excluding them from assessment ignores clear evidence that hydro and transmission projects will be enabled by the road and associated mining. Without assessing these linked developments, the cumulative effects analysis cannot determine how the Project will impact Indigenous rights.	This is considered outside the scope of the approved provincial Terms of Reference and federal TISG. Hydroelectric and transmission developments on the Attawapiskat and Albany Rivers are excluded because their effects do not overlap with the social effects of the road within the RSA, and they fall outside the study areas for all other valued components. The approach to determining whether reasonably foreseeable developments are included in the cumulative effects assessment is described as consistent with federal guidance, the ToR, and the TISG.	Appendix B - Section 1.4 (Cumulative Effects)

First Nation / Stakeholder	Comment Received	Concern	Response	Addressed Section
Constance Lake First Nation	CRT for Draft EAR/IS Comment #5	Unrestricted road access in traditional homelands has caused significant harms, including increased poaching, unregulated hunting, unauthorized industrial activity, and disturbances to cultural and spiritual sites, resulting in degradation of the land and infringements on rights. These past experiences raise serious concerns that the Project could create similar impacts without strong access controls, with direct consequences for the protection of Indigenous lands and the exercise of inherent and Treaty rights. Manned checkpoints should be installed at both ends of the road to prevent unrestricted access. Webequie should retain authority over road access, and the road should be actively monitored to deter unauthorized use and protect environmental, cultural, and spiritual values.	The issue of access control will be addressed outside the EAR/IS review process by the future owner or operator. Preliminary information on potential controls is included in the Project Description, but no definitive measures have been established. Decisions on access controls depend on future agreements between Webequie First Nation and Ontario, as well as jurisdiction over different sections of the road, including portions crossing reserve lands. It has not yet been determined who will construct, operate, or maintain the road, and these matters will be resolved in later Project phases.	-
Constance Lake First Nation	CRT for Draft EAR/IS Comment #6	The assessment does not describe how First Nations will participate in environmental monitoring, weakening long-term management and failing to recognize Indigenous leadership and rights in land stewardship. A coordinated approach is needed that defines roles for Indigenous communities in monitoring, data collection, analysis, consultation, and decision-making. Clear performance metrics for key environmental indicators and transparent public reporting should also be included.	The Final EAR/IS will include additional information, with commitments to establish an Environment Committee involving Indigenous Elders, Knowledge Holders, and other Indigenous Nations to support communication, integrate Indigenous Knowledge, evaluate land use information, and help develop monitoring programs as part of the CEMP and OEMP. The Community Readiness Working Group provides a framework for participation in planning, mitigation, and monitoring. Performance metrics and detailed monitoring requirements will be addressed outside the EAR/IS review process by the future owner or operator, with specifics developed during detailed design, permitting, and subsequent project stages.	Addendum Section 6.4.2 (Proposed Mitigation and Enhancement Measures) Final EAR/IS Appendix N (Community Readiness Plan) Final EAR/IS Appendix E (Mitigation Measures)
Constance Lake First Nation	CRT for Draft EAR/IS Comment #36	The Draft EAR/IS ignores key ice processes that can damage crossings, degrade water quality, block fish passage, and affect the exercise of rights. Ice-dynamics modeling, structural resilience evaluations, contingency designs, and Indigenous knowledge must be included. Regulators should require explicit analysis, post-breakup monitoring,	Ice-related risks are being studied with Northwest Hydraulic Consultants through regional breakup analyses and ongoing site-specific evaluations, with further work planned during detailed design. Opportunities for Indigenous communities to share Indigenous Knowledge remain open and will	Addendum Section 6.1.2 (Proposed Mitigation and Enhancement Measures) Final EAR/IS Appendix N (Community Readiness Plan)

First Nation / Stakeholder	Comment Received	Concern	Response	Addressed Section
		adaptive triggers, and emergency protocols for ice-jam flooding	be incorporated if provided. Comments requesting regulatory requirements, emergency protocols, or Crown-led actions are outside the proponent's responsibility and have been forwarded to Ontario and Canada for their direct response.	Final EAR/IS Appendix E (Mitigation Measures)
Constance Lake First Nation	CRT for Draft EAR/IS Comment #55	The Draft EAR/IS does not address Free, Prior and Informed Consent (FPIC), despite its central role within UNDRIP and its relevance to evaluating impacts on Aboriginal and Treaty rights. FPIC is essential to ensuring Indigenous rights, interests, and decision-making authority are respected for major projects affecting their lands and resources. Clarification is required on how FPIC is being considered within the Project and within the assessment of impacts to Indigenous rights.	The item will be addressed in the Final EAR/IS. Text has been added explaining that Free, Prior and Informed Consent (FPIC) is a core principle of UNDRIP, affirming the right of Indigenous Peoples to give or withhold consent to projects affecting their lands, territories, resources, cultures, or rights. FPIC must be free of coercion, provided prior to any authorization, based on full information, and reflect the right to approve or reject the Project.	Addendum - Section 8.3 (Matters Requiring Crown Determination)
Eabametoong First Nation	Comment received on March 2, 2026	Eabametoong First Nation leadership has stated our support for Webequie to pursue community development projects and community road access. However, the proposed WSR, as described in the EA/IS documents, is explicitly a dual-purpose road (WSR S. 4.2.1) with the potential to dramatically impact EFN Aboriginal and/or Treaty Rights and Interests via multiple Ring of Fire mine projects and induced exploration and mineral development throughout the region, as acknowledged by the proponents. EFN writes today to clarify that the EA/IS, and the analysis of potential impacts, mitigation measures, and residual effects, predicated on a narrow and incorrect understanding of EFN areas of current and historic use (e.g. Fig 19-5) drawn from publicly-available maps developed by Ontario as part of the EFN Land Use Planning process. That 'area of interest for planning' was established by Ontario to identify zoning regions and is not reflective of even half of EFN's traditional territory.  Eabametoong's self-identified primary land use/consultation area boundary is outlined in the attached guidance document (Schedule "A") that	Webequie First Nation (WFN) appreciates support from Eabametoong First Nation (EFN) leadership for our community development projects and the proposed Webequie Supply Road (WSR) Project.  We respect the importance of Rights Impact Assessment that work to your Nation, while decisions regarding timing and regulatory process rest with the Crown. The WSR Project Team acknowledges the receipt of "Schedule A - Traditional Territory Map Eabametoong Area of Interest". To address concerns raised by the review of the EAR/IS, the Project Team is conducting a further evaluation of the Project's potential impacts and cumulative impacts on Indigenous Peoples and the Exercise of Aboriginal and Treaty Rights, based on available information. The assessment will be documented in Addenda 1 to the Final EAR/IS, which is proposed to be released and posted on the project website ( <a href="http://www.supplyroad.ca">www.supplyroad.ca</a> ) on March 26, 2026. EFN will be notified and offered the	Addendum Section 6.1 (Potential Impacts of the Project on Rights Associated with Current and Historical Use of Lands and Resources for Traditional Purposes)  Addendum Section 6.2 (Potential Impacts of the Project on Rights Associated with Cultural Continuity)  Addendum Section 7 (Cumulative Effects on Indigenous Rights)

First Nation / Stakeholder	Comment Received	Concern	Response	Addressed Section
		<p>has been shared with Ontario and mining proponents since at least 2022. This boundary is identified in the guidance document as an 'Eabametoong Areas of Interest Example for Discussion' and is shared here on a without prejudice basis as a publicly available example of Eabametoong's Aboriginal and Treaty rights core use and occupancy area of interest.</p> <p>As discussed above, the effects assessment in the Section 19 and WSR EA/IS is highly inaccurate due to the incorrect use of the Taashikaywin LUP Area as a proxy for Eabametoong's traditional use area. This is particularly confusing and frustrating for EFN since we have such close familial connections and shared history of use and occupancy throughout the region with WFN. A proper process must be determined, now under unfortunately compressed timelines, to ensure that the final EA/IS includes an assessment of additional areas identified by Eabametoong land users.</p> <p>As our family in Webequie First Nation knows, EFN has strong historic and current use of a much broader range of territory, and our sister communities in Neskantaga, Nibinamik and Webequie were very recently part of the Fort Hope Band. This is not, however, an exclusive claim to territory, as with our neighbours and family in Marten Falls, we have shared interests in our common ancestral lands; and in particular with common families among our current First Nations including Moonias, Achneepineskum, Whitehead, Sugarhead, Slipperjack, and many other families with shared lineage and recent use of traditional territories and harvesting regions. At a minimum, this calls into question the very limited acknowledgement of EFN rights and interests throughout the WSR EA/IS, and particular Section 19, your Assessment of Effects upon Indigenous Peoples and Impacts to the Exercise of Aboriginal and Treaty Rights.</p> <p>IAAC has requested comments by February 27th to clarify whether the IAAC and Proponent have</p>	<p>opportunity to provide comments on the addenda.</p>	

First Nation / Stakeholder	Comment Received	Concern	Response	Addressed Section
		<p>adequate information to conduct the Impact Assessment. Our answer is a definite no. The EA/IS is based on only a partial understanding of EFN rights and interests, as Chief and Council communicated to IAAC staff during the January visit to EFN.</p> <p>Eabametoong is presently coordinating land user meetings to identify, on a preliminary basis, additional traditional use areas that are relevant to the Project. As noted above, we are prepared to work cooperatively with WFN to agree on a process for the incorporation of this next layer of TUS information into the EA and any required mitigation, accommodation and other measures in dialogue with WFN and Ontario funders or co-proponents of the road project.</p> <p>Eabametoong cannot provide informed input on the Project in light of ongoing uncertainty about who is going to manage the Road. In general, we view the Draft WSR EA Report and EA/IS, and in particular Section 19, as significantly understating the potential impact of increased public access, including potential industrial activity, in now remote areas where we practice our Aboriginal and Treaty rights.</p>		
Eabametoong First Nation	Comment received on March 2, 2026	<p>If WFN continues to be the Project proponent, will WFN work with other impacted First Nations, including Eabametoong, on regulating road use to ensure impacts on Aboriginal and Treaty rights, and the environment, are properly and effectively mitigated? Will the road be a provincial road, subject to general provincial highway regulations? If Ontario, or a Federal-Provincial partnership of some kind, is responsible for funding, constructing and managing the road, will EFN be included in the management of the road and controlling access to our homelands that may be impacted by new access and activities throughout the region? These are vital questions for WFN as EA proponent and Ontario as the EA funder to answer in order to determine long term impacts upon EFN, and for the Aboriginal and Treaty rights assessment to fully consider mitigation and</p>	<p>Our response to your letter is limited to those comments that are within the scope of what WFN is responsible for responding to as the proponent for the WSR Environmental Assessment / Impact Assessment (EA/IA). It is our understanding that Ontario and Canada will respond directly to you on the comments in your letter directed to the Crown and its regulatory process.</p> <p>If WFN continues to be the Project proponent, WFN remain committed to ongoing dialogue and collaboration with other potentially affected Indigenous communities, including EFN. It is envisioned the ultimate owner/operator will provide opportunities for interested First Nations during the detail design stage to provide input on</p>	<p>Addendum Section 6.1.2, 6.2.2, and 6.4.2 (Proposed Mitigation and Enhancement Measures)</p> <p>Final EAR/IS Appendix N (Community Readiness Plan)</p> <p>Final EAR/IS Appendix E (Mitigation Measures)</p>

First Nation / Stakeholder	Comment Received	Concern	Response	Addressed Section
		accommodation measures. Moreover, Eabametoong must be included in any such monitoring and management commitments.	mitigation/accommodation measures, long term Project monitoring, and control of road access in the development of the Construction Environmental Management Plan and Operations Environmental Management Plan for implementation. Decisions on the Final EAR/IS including regarding regulatory timelines and reviews rest with the Crown regulators. These decisions are not within the authority or control of the WSR Project Team.	
Fort Albany First Nation	CRT for Draft EAR/IS Comment #4	The Draft EAR/IS does not describe how Fort Albany First Nation's right to give or withhold consent will be respected for decisions affecting their lands, rights, and way of life. Consultation is mentioned, but the process for seeking consent or addressing withheld consent is not explained. The assessment should acknowledge Fort Albany First Nation's right to Free, Prior and Informed Consent and clearly outline how consent will be sought, documented, and incorporated into decisions that may affect Fort Albany First Nation's rights.	The item will be addressed in the Final EAR/IS. The Project commits to the principles in UNDRIP and the United Nations Declaration Act, including FPIC, which are outlined in Section 19.1.1.1.4. However, the application and upholding of inherent rights, including FPIC, are responsibilities of the Crown, which holds the constitutional duty to consult, accommodate, and determine consent. Engagement with Fort Albany First Nation will continue in a manner consistent with UNDRIP and UNDA principles, with transparent information provided to support meaningful participation.	Addendum Section 6.1 (Potential Impacts of the Project on Rights Associated with Current and Historical Use of Lands and Resources for Traditional Purposes) Addendum Section 6.2 (Potential Impacts of the Project on Rights Associated with Cultural Continuity) Addendum Section 6.3 (Potential Impacts of the Project on Rights Associated with Socio-Economic, Health and Well-Being) Addendum Section 6.4 (Potential Impacts of the Project on Rights Associated with Self-Determination and Self-Governance) Addendum Section 7 (Cumulative Effects on Indigenous Rights)

First Nation / Stakeholder	Comment Received	Concern	Response	Addressed Section
Fort Albany First Nation	CRT for Draft EAR/IS Comment #5	The Draft EAR/IS identifies pathways such as noise, land clearing, and increased access that may affect Indigenous rights, but it does not apply these pathways to Fort Albany First Nation despite confirming that Fort Albany First Nation hunts, traps, and maintains traplines in the region. The absence of trapline-specific analysis makes it unclear how construction noise, road access, and habitat disturbance could affect Fort Albany First Nation's harvesting, spiritual areas, wildlife movements, plant availability, or intergenerational teaching. The Draft EAR/IS should provide clear pathway analysis for Fort Albany First Nation's rights and assess whether effects described for other Nations also apply to Fort Albany First Nation, adjusting impact ratings where appropriate.	The item will be addressed in the Final EAR/IS. Sections 6–21 describe pathways such as vegetation clearing, noise, wildlife disturbance, and increased access, along with proposed mitigation measures. The analysis of traditional land and resource use in the LSA and RSA concludes negligible effects based on currently available information. The assessment of impacts on Aboriginal and Treaty rights was not completed for the Draft EAR/IS and will be provided through an addendum to the Final EAR/IS for Fort Albany First Nation review.	See above.
Fort Albany First Nation	CRT for Draft EAR/IS Comment #7	The Draft EAR/IS lists past, present, and foreseeable developments in the region, including major Ring of Fire mines and associated roads and transmission projects, but it does not assess how these developments together could affect Fort Albany First Nation's long-term ability to exercise rights. Potential cumulative pressures (increased access, traffic, land-use change, and future mining) are not analyzed in relation to Fort Albany First Nation's hunting, trapping, gathering, land stewardship responsibilities, or intergenerational knowledge transfer. The Draft EAR/IS should evaluate how this Project, combined with foreseeable mining and infrastructure corridors, could alter land use patterns and place long-term pressures on culturally and ecologically important areas used by Fort Albany First Nation.	This will be addressed through an addendum to the Final EAR/IS. Section 21.4.12 covers cumulative effects on Indigenous Peoples and the exercise of Aboriginal and Treaty rights, and this work is still in progress. Cumulative effects will be evaluated once the severity of potential adverse impacts on Indigenous Peoples and rights is fully characterized, including foreseeable developments such as mining, roads, transmission lines, and service corridors and how these may interact with the Project to influence land use patterns, access, and long-term rights practice. Recent information provided by Fort Albany First Nation through the IKLRU Report will be used to update the analysis of potential effects on Fort Albany First Nation's interests and rights, including traplines, harvesting, and cultural practices.	Addendum Section 7 (Cumulative Effects on Indigenous Rights)
Fort Albany First Nation	CRT for Draft EAR/IS Comment #13	The Draft EAR/IS assigns low or negligible impacts to traplines, cultural sites, and spiritual areas without explaining how these ratings were determined. Key pathways such as wildlife movement, noise, and access changes are not linked to Fort Albany First Nation's rights-based practices, and redacted	This item will be addressed in the Final EAR/IS. The redacted information applies only to other Indigenous communities, such as Marten Falls First Nation, Weenusk First Nation, and Webequie First Nation, and does not involve Fort Albany First Nation or its	Appendix B - Section 1.3 (Predicted Net Effects) Addendum Section 6.1 (Potential Impacts of the Project on Rights Associated with Current

First Nation / Stakeholder	Comment Received	Concern	Response	Addressed Section
		sections prevent understanding how sacred or ceremonial sites were evaluated. Cultural sites are assessed using heritage standards rather than community-specific values. Clear rationale, evidence, uncertainties, and a secure process for reviewing site-specific information are needed to support the impact ratings.	traditional territory. No site-specific information for Fort Albany First Nation has been provided to the Project team at this time.	and Historical Use of Lands and Resources for Traditional Purposes) Addendum Section 6.2 (Potential Impacts of the Project on Rights Associated with Cultural Continuity)
Fort Albany First Nation	CRT for Draft EAR/IS Comment #14	The Draft EAR/IS notes Fort Albany First Nation's concerns about the Albany River system but excludes it from cumulative effects analysis because the Project does not directly cross the watershed. Fort Albany First Nation stresses that indirect and downstream changes in water, flow, ice, and travel safety along with traffic connecting to other roads that do cross the watershed could affect rights and interests. The Albany River system should be included in the cumulative effects assessment to evaluate these indirect and downstream risks.	The item will be addressed in the Final EAR/IS. Cumulative effects on surface water resources from the Webequie Supply Road, the Northern Road Link, and the Marten Falls Community Access Road are assessed in Section 21.4.2.	Addendum Section 7 (Cumulative Effects on Indigenous Rights)
Fort Albany First Nation	CRT for Draft EAR/IS Comment #15	The Draft EAR/IS identifies foreseeable mining, road, and transmission developments but does not assess how these connected projects, together with the Webequie Supply Road, could affect Fort Albany First Nation's rights, stewardship responsibilities, or cultural continuity. A clearer plan is needed to address cumulative effects, mitigation, monitoring, adaptive management, and Fort Albany First Nation's role in decision-making.	This item will be addressed in the Final EAR/IS. The Ring of Fire Regional Assessment is being co-developed with Indigenous communities and is independent from the Webequie Supply Road process. Relevant findings will be incorporated into cumulative effects analysis, mitigation planning, and follow-up programs once available, but no information from the Regional Assessment is currently available for use.	Addendum Section 7 (Cumulative Effects on Indigenous Rights) Appendix B - Section 1.4 (Cumulative Effects)
Fort Albany First Nation	CRT for Draft EAR/IS Comment #16	The Draft EAR/IS notes climate-related vulnerabilities but does not assess how changing weather, unstable ice, species shifts, or extreme conditions may interact with the Project to affect Fort Albany First Nation's travel, harvesting, cultural practices, or long-term ability to exercise rights. An assessment of these combined effects is needed.	This will be addressed through an addendum to the Final EAR/IS. Section 9 concludes no significant Project-related climate effects are anticipated, and broader climate variability is not expected to interact with the Project in a way that causes significant adverse effects. The importance of understanding climate-related impacts on rights and practices is acknowledged, and Fort Albany First Nation input is welcomed to inform future planning.	Addendum Section 7 (Cumulative Effects on Indigenous Rights) Appendix B - Section 1.4 (Cumulative Effects)

First Nation / Stakeholder	Comment Received	Concern	Response	Addressed Section
Fort Albany First Nation	October 28, 2025 Letter	The Draft EAR/IS review period overlaps with provincial and federal legislation intended to expedite Ring of Fire development, which Fort Albany First Nation opposes as harmful to Treaty 9 rights and is challenging in court. Assurance is requested that Webequie First Nation will not support these laws being used to fast-track or weaken regulatory processes for the Webequie Supply Road.	This is considered outside the scope of the approved provincial Terms of Reference and federal TISG. This matter is outside what Webequie First Nation is responsible for responding to within the WSR environmental assessment process.	Addendum Section 6.4 (Potential Impacts of the Project on Rights Associated with Self-Determination and Self-Governance) Final EAR/IS Appendix N (Community Readiness Plan)
Mushkegowuk Council	CRT from Draft EAR/IS Comment #29	The Draft EAR/IS does not address broader risks that the Webequie Supply Road could enable large-scale resource extraction, reduce First Nations' control over development, or undermine the application of UNDRIP and Treaty 9 rights. Concerns include potential Special Economic Zone designations, legislation facilitating expedited extraction, and downstream projects such as hydropower and refining that could proceed without meaningful First Nation choice.	This item will be addressed in the Final EAR/IS. Feedback from Mushkegowuk Council will be reflected in the assessment of effects on Indigenous Peoples and the exercise of Aboriginal and Treaty rights. Section 19.5.4 highlights the importance of Indigenous self-determination and self-governance under UNDRIP and the United Nations Declaration Act and describes potential impacts on these rights for Webequie First Nation, Attawapiskat First Nation, Weenusk First Nation, Fort Albany First Nation, and Kashechewan First Nation. The Final EAR/IS will incorporate First Nations' input and include an updated cumulative effects assessment that considers development in the Wawangwajing (Ring of Fire) area.	Addendum Section 7 (Cumulative Effects on Indigenous Rights) Appendix B - Section 1.4 (Cumulative Effects)
Mushkegowuk Council	CRT from Draft EAR/IS Comment #48	Mushkegowuk Council agrees with Aroland First Nation that presenting the Webequie Supply Road in isolation underestimates impacts because all-season roads will enable extensive mineral exploration and development in the Ring of Fire. They assert that a regional assessment is necessary to evaluate cumulative effects on Indigenous Peoples and on inherent and Treaty rights.	The cumulative effects assessment in Section 21 includes reasonably foreseeable projects and activities, including mining. An addendum to the Final EAR/IS will be completed by the end of the review period and will further assess cumulative effects on established Aboriginal and Treaty rights.	Addendum Section 7 (Cumulative Effects on Indigenous Rights) Appendix B - Section 1.4 (Cumulative Effects)
Marten Falls First Nation	CRT from Draft EAR/IS Comment #45	The Draft EAR/IS contains grammatical, citation, and quotation errors in sections describing Marten Falls First Nation's Indigenous Knowledge, creating the impression that Marten Falls First Nation perspectives are less capable or credible. These	Section 19 has been revised to address errors identified.	Final EAR/IS Section 19 (Indigenous Peoples)

First Nation / Stakeholder	Comment Received	Concern	Response	Addressed Section
		errors risk being carried into the final document and affecting other rights-holders' IK submissions. Corrections are needed so statements accurately reflect what Marten Falls First Nation members said, including their recommendations on noise regulation, wildlife protection, and shared authority in environmental monitoring.		
Marten Falls First Nation	CRT from Draft EAR/IS Comment #80	The Draft EAR/IS uses the unclear term "well-being rights" when describing potential impacts on Marten Falls First Nation. The meaning of this term is not defined, making the statement confusing. The wording should be revised to clearly explain what specific rights or interests are being referred to.	The item will be addressed in the Final EAR/IS. The sentence has been revised to state that the Project could affect Marten Falls First Nation's cultural continuity through increased access to culturally and spiritually important areas. Socio-economic, health, and well-being rights are described as Indigenous rights under UNDRIP, including rights to survival, dignity, improved social conditions, health, and access to traditional medicines.	Addendum Section 5.1.1 (Identification of Effects to Indigenous Peoples and Impacts to Aboriginal and Treaty Rights for Assessment) Addendum Section 6.3 (Potential Impacts of the Project on Rights Associated with Socio-Economic, Health and Well-Being)
Marten Falls First Nation	CRT from Draft EAR/IS Comment #89	The Draft EAR/IS includes unclear wording about "enhanced enforcement" and "least disruption and harassment," making it unclear who "them" refers to. Fort Albany First Nation indicates that Marten Falls First Nation members want stronger government enforcement to prevent overharvesting and external pressures but without encroaching on traditional activities or Aboriginal and Treaty rights. Clarification is needed that some Marten Falls First Nation members recommend a tribal police force to balance enforcement with protection of rights.	The item will be addressed in the Final EAR/IS. The paragraph has been reframed to clarify that Marten Falls First Nation is concerned about overharvesting and external pressures and recommends regulations, stricter licensing, and enhanced enforcement. Community members emphasized that enforcement should not encroach on traditional activities or Aboriginal and Treaty rights, and some suggested a tribal police force to help balance protection with autonomy.	Addendum Section 6.4.2 (Proposed Mitigation and Enhancement Measures) Final EAR/IS Appendix N (Community Readiness Plan) Final EAR/IS Appendix E (Mitigation Measures)
Marten Falls First Nation	CRT from Draft EAR/IS Comment #98	The Draft EAR/IS uses the unclear term "well-being rights". Clarification is needed to explain what specific rights or interests this term refers to.	The item will be addressed in the Final EAR/IS. The sentence has been revised to refer to impacts on Marten Falls First Nation's cultural continuity. Socio-economic, health, and well-being rights are described as Indigenous rights under UNDRIP, including rights to survival, dignity, improved social conditions, health, and access to traditional medicines.	Addendum Section 5.1.1 (Identification of Effects to Indigenous Peoples and Impacts to Aboriginal and Treaty Rights for Assessment) Addendum Section 6.3 (Potential Impacts of the Project on Rights)

First Nation / Stakeholder	Comment Received	Concern	Response	Addressed Section
				Associated with Socio-Economic, Health and Well-Being)
Nibinamik First Nation	CRT from Draft EAR/IS Comment #1	Nibinamik has not been supported to participate meaningfully in the EAR/IS, as no Nibinamik-specific Traditional Knowledge and Land Use Study (TKLUS) or baseline study has been conducted. Without these studies, the effects on Nibinamik's Aboriginal and Treaty rights and title cannot be properly assessed. Nibinamik needs support in conducting a TKLUS and baseline study.	The Project Team states that it has offered Indigenous communities, including Nibinamik, opportunities and capacity funding to participate in the IKLRU program and share knowledge for the EA/IA. They note that Nibinamik has not provided site-specific information to date; therefore, a detailed assessment of Project impacts on Nibinamik's Aboriginal and Treaty rights and title has not been completed.	Addendum Section 5.2 (Limitations and Uncertainty and Prediction of Confidence in the Assessment)
Nibinamik First Nation	CRT from Draft EAR/IS Comment #3	The Draft EAR/IS defers key mitigation, monitoring, and adaptive management plans to later stages and other proponents, relying on unproven assumptions such as fully effective invasive species control to dismiss potential impacts. This lack of defined measures, contingencies, and accountability makes the assessment speculative and creates uncertainty for the protection of Nibinamik's Rights and interests. Nibinamik requires meaningful, capacity-funded involvement in co-developing all mitigation and monitoring plans from the outset, with IK-based thresholds, clear adaptive management triggers, corrective actions, and collaborative decision-making beyond simple document review.	This item will be addressed outside of the EAR/IS review process and taken on by the ultimate owner/operator.	-
Nibinamik First Nation	CRT from Draft EAR/IS Comment #5	The Draft EAR/IS applies effects classification criteria in a way that down-weights impacts, obscures the seriousness of potential outcomes, and makes it difficult for effects, particularly those affecting water, wildlife, fish habitat, non-traditional resource use, and GHG emissions to ever be deemed significant, especially given the limited integration of IK/TEK. This approach undermines the validity of the assessment and the determination of when cumulative effects analysis or additional mitigation is required. Nibinamik requests that all scoring be revised using a more conservative classification with clear IK/TEK integration, followed	The Final EAR/IS will revise the significance determination approach by using qualitative aggregation rather than numerical scoring. IK/TEK has been incorporated where available through discipline-specific sections summarizing knowledge provided by Indigenous communities and assert that this information has been integrated into the effects assessments. Feedback from Indigenous communities on the Draft EAR/IS, particularly regarding impacts on Indigenous Peoples and the exercise of Aboriginal and Treaty Rights has been considered in the	Final EAR/IS Section 19 (Indigenous Peoples) Appendix B - Section 1.1.1 (Characterization of Net Effects)

First Nation / Stakeholder	Comment Received	Concern	Response	Addressed Section
		by a reassessment of significance and the establishment of robust, IK-informed monitoring and adaptive management programs with ongoing engagement to ensure accountability and protection of Rights.	revised significance determinations in Section 19 of the Final EAR/IS.	
Nibinamik First Nation	CRT from Draft EAR/IS Comment #6	The Draft EAR/IS downplays reasonably foreseeable developments (RFDs) and climate change stressors, limiting its ability to assess cumulative effects despite the WSR's clear potential to drive additional industrial development and increase climate-related risks for Nibinamik, including wildfire threats, air quality issues, and impacts to winter road access and country foods. In the context of fast-track approval frameworks under Ontario's Bill 5 and federal Bill C-5, this minimization is inadequate and fails to protect Aboriginal and Treaty rights. Nibinamik requests a more precautionary, evidence-based cumulative effects assessment that expands RFDs, considers synergistic climate impacts, and incorporates Indigenous-led metrics and thresholds including for atmospheric pathways beyond GHGs, such as acid rain and acid rock drainage.	The cumulative effects assessment follows the requirements defined in the approved TISG and ToR. Under the federal Policy Framework, the cumulative effects assessment can only consider future activities that are certain or reasonably foreseeable, and without publicly available information on those activities, cumulative effects predictions cannot be reliably made.	Addendum Section 7 (Cumulative Effects on Indigenous Rights) Appendix B - Section 1.4 (Cumulative Effects)
Nibinamik First Nation	CRT from Draft EAR/IS Comment #27	The Draft EAR/IS uses a Western-centric method for evaluating hydrological effects by emphasizing watershed area loss relative to total watershed size, which overlooks impacts to sensitive hydrological features such as wetlands, recharge zones, and discharge areas, as well as seasonal and climate-driven variations. This approach fails to capture changes in water levels such as prolonged low water that would directly affect Nibinamik's ability to access the land and meaningfully exercise constitutionally protected Rights and Interests.	This issue will be addressed outside the review process by the future owner or operator, and climate considerations have been incorporated into the flow calculations and preliminary engineering design supporting the EA/IA, with further development planned during detailed design.	-
Nibinamik First Nation	CRT from Draft EAR/IS Comment #28	It is unclear how potential downstream or knock-on effects on water and sediment quality have been considered. Additionally, the overflowing of roadside ditches is not identified as an effect pathway, and waterbody crossing impacts are characterized as only temporary. Flooding and road damage have the potential to change surface water quality, quantity,	This item will be addressed outside of the EAR/IS review process and taken on by the ultimate owner/operator. Considerations will be made for using geoliners to reduce the effects of road overtopping and erosion due to flooding.	-

First Nation / Stakeholder	Comment Received	Concern	Response	Addressed Section
		or sediment dynamics, which in turn would directly affect Nibinamik's ability to exercise Rights and Interests. The Draft EAR/IS should describe mitigation and emergency response measures that will be implemented to ensure environmental damage is minimized in the event of flooding.		
Nibinamik First Nation	CRT from Draft EAR/IS Comment #29	The proposed road will cross multiple catchments and alter natural drainage patterns, and although swales and culverts are included in the design, their effectiveness depends heavily on-site conditions. Additional activities such as snow removal, dewatering, and water taking combined with vegetation and peat loss may further change infiltration and water availability. Impacts to the catchment level water balance may degrade ecological integrity and infringe upon Indigenous rights. Further planning and management programs are needed to ensure that catchment-scale water balances are maintained.	This item will be addressed outside of the EAR/IS review process. Further hydrology/hydraulic analysis of water crossings will be undertaken by the ultimate owner/operator during the future detail design and permitting phase for the Project and can be shared with Nibinamik First Nation.	-
Nibinamik First Nation	CRT from Draft EAR/IS Comment #52	The construction schedule in Appendix J underestimates how long sensitive receptors will be exposed to noise. Noise exposure may affect seasonal traditional land use or wildlife. Construction schedules should be developed collaboratively with Indigenous land users to ensure Indigenous rights are respected.	Item will be addressed outside of the EAR/IS review process and taken on by the ultimate owner/operator.	-
Nibinamik First Nation	CRT from Draft EAR/IS Comment #53	Noise from camps such as generators and helicopters should be included as noise sources in the effects assessment. These noises may impact Nibinamik's rights to hunting by scaring away wildlife.	Item will be addressed outside of the EAR/IS review process and taken on by the ultimate owner/operator.  Potential effects of helicopter noise are qualitatively discussed in section 12 of the EAR/IS.	-
Nibinamik First Nation	CRT from Draft EAR/IS Comment #54	The Project will increase disruptions to traditional land use from increased industrial noise. Mitigation measures should limit cumulative noise impacts to address the long-term effects on Indigenous rights.	Item will be addressed outside of the EAR/IS review process.  Noise mitigation measures will be further evaluated during detail design phase for the Project and will be documented in Construction Environmental Management Plan. Trees will be considered in NSAs where appropriate.	-

First Nation / Stakeholder	Comment Received	Concern	Response	Addressed Section
Nibinamik First Nation	CRT from Draft EAR/IS Comment #55	The Project will contribute to GHG emissions and may worsen climate risks and undermine First Nations lands access, mobility, and cultural continuity. A more thorough assessment is needed to address the rights-based impacts the Project will have and GHG specific mitigations are required.	This item will not be addressed as it is considered out of the scope of the approved provincial EA ToR and federal TISG.  The cumulative effects assessment methodology in the EAR/IS followed the requirements defined in the approved TISG and ToR. Per the Policy Framework for Assessing Cumulative Effects under the Impact Assessment Act the cumulative effects assessment should consider future physical activities that are either certain or reasonably foreseeable. Without publicly available information relating to these future physical activities, the ability to predict cumulative effects will lack reliability.	-
Nibinamik First Nation	CRT from Draft EAR/IS Comment #76	Nibinamik is concerned that MNR guidelines for water crossings are out-of-date (25 years old). Best management practices should align with newer guidance. Temporary water crossing design should be done in collaboration with First Nations, to ensure that post-construction rehabilitation is aligned with and respecting Rights, Title, and interests.	This item will be addressed outside of the EAR/IS review process.  Current DFO guidelines and best management practices have been considered by the Project Team in the development of mitigation in the EAR/IS, including those from the MNR. Any updated guidelines and best management practices will be reflected in the CEMP to be developed and implemented for the construction phase.  Where temporary crossings require provincial or federal permits/ authorizations, it is our understanding First Nations will be afforded the opportunity to provide feedback in accordance with Crown's duty to consult.	-
Nibinamik First Nation	CRT from Draft EAR/IS Comment #131	The Draft EAR/IS lists only 9 of 19 Project activities as affecting Community Well-Being (CWB) but all activities directly influence CWB because they all affect wildlife, habitat, traditional land use, Indigenous rights, and community safety.	This will be addressed in the Final EAR/IS submission.  The effects assessment was revised to include more construction activities. It also outlines where community well-being, safety, and cultural continuity have been evaluated across multiple sections of the assessment, including social, cultural, and health-related indicators.	Addendum Section 7 (Cumulative Effects on Indigenous Rights) Appendix B - Section 1.4 (Cumulative Effects)

First Nation / Stakeholder	Comment Received	Concern	Response	Addressed Section
Nibinamik First Nation	CRT from Draft EAR/IS Comment #140	The cumulative effects assessment for the Social Environment VCs are focused on Webequie First Nation and does not discuss other First Nations in the LSA. These communities should be included in the cumulative effects assessment because the Project can have negative impacts on other First Nations CWB and Treaty and Aboriginal rights.	This will be addressed in the Final EAR/IS submission. None of the residual effects identified in Section 14 for other communities in the LSA were predicted to be of moderate significance and therefore were not carried forward in the cumulative effects assessment, as per the methodology laid out in Section 14.7	Final EAR/IS Section 21 (Cumulative Effects)
Nibinamik First Nation	CRT from Draft EAR/IS Comment #144	The Project is positioned as an economic driver for the region but the Draft EAR/IS does not adequately address how Nibinamik will benefit economically or how Treaty-based economic rights will be upheld. Key mitigations, accommodations, and revenue-sharing considerations are missing, and the assessment does not reflect Nibinamik's self-determination goals or community priorities. While the proponent commits to continued engagement and a Community Readiness Working Group, many economic issues, including equitable benefits, community readiness, and impacts to traditional economies remain undefined and outside the current scope of the EAR/IS.	This item will be addressed in the Final EAR/IS submission. Section 19 evaluates impacts on Indigenous rights, traditional practices, and community priorities based on ongoing engagement. While economic participation and community readiness are being discussed with Indigenous communities, issues like revenue sharing and Treaty-based economic obligations fall outside the EAR/IS scope and will be handled through separate processes. The proponent commits to continued coordination with Nibinamik, encouraging the First Nation to propose mitigation and enhancement measures through the planned Community Readiness Working Group (in Appendix N).	Addendum Section 6.1 (Potential Impacts of the Project on Rights Associated with Current and Historical Use of Lands and Resources for Traditional Purposes) Addendum Section 6.2 (Potential Impacts of the Project on Rights Associated with Cultural Continuity) Addendum Section 6.3 (Potential Impacts of the Project on Rights Associated with Socio-Economic, Health and Well-Being) Addendum Section 6.4 (Potential Impacts of the Project on Rights Associated with Self-Determination and Self-Governance) Final EAR/IS Appendix N (Community Readiness Plan) Final EAR/IS Appendix E (Mitigation Measures)

First Nation / Stakeholder	Comment Received	Concern	Response	Addressed Section
Nibinamik First Nation	CRT from Draft EAR/IS Comment #146	The Draft EAR/IS acknowledges traditional economies but lacks sufficient data, leaving potential impacts to Nibinamik's rights underrepresented, especially since traditional economies are closely tied to fish, wildlife, and vegetation. A cumulative effects assessment of impacts on traditional economies is needed to understand how traditional economies will be affected by the long-term regional development the Project will bring. This assessment should be validated by Nibinamik.	This item will be addressed in the Final EAR/IS submission and Nibinamik will have the opportunity to validate the assessment.	Addendum Section 6.1 (Potential Impacts of the Project on Rights Associated with Current and Historical Use of Lands and Resources for Traditional Purposes) Addendum Section 7 (Cumulative Effects on Indigenous Rights)
Nibinamik First Nation	CRT from Draft EAR/IS Comment #163	The Draft EAR/IS invites First Nations to develop and implement monitoring programs to monitor the effects of the Project on their rights and interests. Funding should be provided for First Nations to implement these programs.	This item will be addressed outside of the EAR/IS review process and taken on by the ultimate owner/operator.	-
Nibinamik First Nation	CRT from Draft EAR/IS Comment #166	The spatial boundaries described in Section 19.1.5.1 do not match the map in Figure 19.3. While the text indicates that the LSA includes surrounding First Nations such as Nibinamik, the map shows only a narrow buffer around the road and an RSA that excludes other First Nations. For the purpose of the Indigenous Peoples and Aboriginal and Treaty Rights, the Project footprint, LSA and RSA should be as quantitatively described in Section 19.1.5.1 and not as shown on the map. The spatial boundaries should be both written and portrayed on a map.	This item will be addressed in the Final EAR/IS.	Final EAR/IS Section 19 (Indigenous Peoples)
Nibinamik First Nation	CRT from Draft EAR/IS Comment #183	The Draft EAR/IS claims the Project is sustainable, but significant uncertainties and assessment gaps make it unclear whether Nibinamik's rights and ecological well-being will be protected. Ecological conditions underpin all other aspects of well-being, including Aboriginal and Treaty Rights, and the deficiencies identified in the review create concern about potential long-term or irreversible impacts. The assertion of Project sustainability is therefore uncertain, and completing the Regional Assessment beforehand along with continued, meaningful involvement of Nibinamik and other First Nations	This item will not be addressed as considered out of the scope of the approved provincial EA ToR and federal TISG.  The Regional Assessment is being co-developed and co-led with Indigenous communities from Matawa and Mushkegowuk Territories. This process is independent of the EAR/IS for the Webequie Supply Road but, as required by the <i>Impact Assessment Act</i> and the Tailored Impact Statement Guidelines, relevant information from the Regional Assessment will be used to inform	-

First Nation / Stakeholder	Comment Received	Concern	Response	Addressed Section
		would help reduce uncertainties and strengthen mitigation measures.	the effects assessment for the Project should this be provided during the EA/IA process for the Project. At this time there is no information available from the Ring of Fire Regional Assessment to consider in the EA/IA for the Project.	
MECP - EA Branch	CRT from Draft EAR/IS Comment #47	Section 19.6 outlines the approach to determine severity of impacts on the rights of Indigenous people, and defines what is considered low, medium, and high severity but the results are never discussed.	The assessment of potential impacts on the exercise of Aboriginal and Treaty rights will be completed as an addendum to the Final EAR/IS.	Addendum Section 6.1 (Potential Impacts of the Project on Rights Associated with Current and Historical Use of Lands and Resources for Traditional Purposes) Addendum Section 6.2 (Potential Impacts of the Project on Rights Associated with Cultural Continuity) Addendum Section 6.3 (Potential Impacts of the Project on Rights Associated with Socio-Economic, Health and Well-Being) Addendum Section 6.4 (Potential Impacts of the Project on Rights Associated with Self-Determination and Self-Governance)
MECP – Indigenous Advisor EA Modernization Branch	CRT from Draft EAR/IS Comment #17	Each VC section (6-20) includes subsections summarizing consideration of input from engagement and consultation, and Indigenous Knowledge. With respect to Section 19, please ensure that all impacts to Aboriginal or Treaty rights identified by Indigenous communities through consultation (including on this Draft EAR/IS) are captured in the Final EAR/IS.	The section presenting the assessment of impacts on Aboriginal and Treaty rights will be reviewed so that all impacts identified by Indigenous communities through consultation will have been added to an addendum to the EAR/IS.	Addendum Appendix A (Responses to Comments on Assessment of Effects on Indigenous Peoples) Final EAR/IS Section 19 (Indigenous Peoples) Final EAR/IS Record of Engagement and Consultation

First Nation / Stakeholder	Comment Received	Concern	Response	Addressed Section
MNR	CRT from Draft EAR/IS Comment #67	Section 19 discusses “changes to rights”. A definition or clarification on what might constitute a “change to rights” should be included.	Text has been reworded to “impacts on rights” rather than “changes to rights”.	Final EAR/IS Section 19 (Indigenous Peoples)
MNR	CRT from Draft EAR/IS Comment #72	Section 21 states that “the assessment of cumulative effects on Indigenous Peoples and impacts to the exercise of Aboriginal and Treaty rights is to be determined. It would be helpful for this section to describe whether this assessment will be completed and incorporated into the Final EA.	This section will be completed and incorporated into the Final EA.	Addendum Section 7 (Cumulative Effects on Indigenous Rights)
MECP Indigenous Advisor	CRT from Draft EAR/IS Comment #3	Wapekeka First Nation was identified by Ontario as having Aboriginal or Treaty rights potentially impacted by the Project and therefore an asterisk should be added to Wapekeka in the table in ES 5.2.1 and Table 2-1.	An asterisk has been added to Wapekeka in the table in ES 5.2.1 and Table 2-1.	Final EAR/IS Executive Summary
MECP Indigenous Advisor	CRT from Draft EAR/IS Comment #5	The Draft EAR/IS states that the Project team invited all 22 Indigenous communities to participate in the IKLRU Program. It is understood that Ontario only funded communities being consulted on a rights-basis. Confirmation needed that this opportunity was offered to all 22 communities.	Project team confirmed that all 22 Indigenous communities were invited to participate in the IKLRU Program.	Final EAR/IS Section 2 (Engagement and Consultation) Final EAR/IS Record of Engagement and Consultation

# APPENDIX B

Supplemental Information on Current and Historical Use of Lands and Resources for Traditional Purposes and Cultural Continuity



# 1. Predicted Net Effects of the Project and Cumulative Net Effects on Current and Historical Use of Lands and Resources for Traditional Purposes and Cultural Continuity

## 1.1 Methodology and Approach

Using the information currently available, this Addendum describes the predicted net effects of the Project and the net cumulative effects on the current and historical use of lands and resources for traditional purposes and for purposes of cultural continuity.

Section 19.3.1 and 19.3.2 of the Final Environmental Assessment Report/Impact Statement (EAR/IS) presented descriptions of the identified potential effects of the Project on current and historical use of lands and resources for traditional purposes and cultural continuity, respectively, in consideration of the existing conditions, their indicators of change, the interactions with Project activities and the pathways of effects for the Project's construction phase and operations phase for these Indigenous People's values. Table 19-4 provides details of the Indigenous Peoples' values, indicators and rationale considered for this assessment. Table 19-11 of the EAR/IS provides details of the following effect pathways for current and historical use of lands and resources for traditional purposes and cultural continuity:

- Current and Historical Use of Lands and Resources for Traditional Purposes:
  - Availability of lands and resources for traditional harvesting;
  - Sites and areas used for traditional harvesting; and
  - Access to lands and resources used for traditional harvesting.
- Cultural Continuity:
  - Sites and areas used for cultural and spiritual purposes;
  - Access to lands and resources used for cultural and spiritual purposes; and
  - Cultural traditions and practices, including use and preservation of Indigenous languages.

The effects assessment has relied on available information, which in many cases was limited to secondary publicly available information; however, the EAR/IS and this Addendum has integrated information made available to the proponent through the EAR/IS preparation to-date, including a community-led Indigenous rights impact assessment for Webequie First Nation, and submission of Indigenous Knowledge and Land and Resource Use (IKLRU) studies by Indigenous communities, as well as comments from Indigenous communities on the review of EAR/IS documentation and engagement and consultation activities.

## 1.2 Predicted Net Effects

### 1.2.1 Characterization of Net Effects

Net effects are defined as the effects of the Project that remain after the application of proposed mitigation measures. In Section 19.4 of the EAR/IS, mitigation measures and enhancements were identified for the potential effects on the current and historical use of lands and resources for traditional purposes and cultural continuity. The effects assessment follows the general process described in Section 5 of the Final EAR/IS. The focus of the effects assessment is on predicted net effects. Potential effects with no predicted net effect after implementation of mitigation measures are not carried forward to the net effects characterization or the cumulative effects assessment.

**Table 1-1** presents definitions for net effects criteria, developed with specific reference to the current and historical use of lands and resources for traditional purposes and cultural continuity.

**Table 1-1: Criteria for Characterization of Predicted Net Effects on Current and Historical Use of Lands and Resources for Traditional Purposes and Cultural Continuity**

Characterization Criteria	Description	Definition of Qualitative Categories
Direction	Relates to the direction of the effect in relation to the existing conditions.	<p><b>Positive</b> – Net gain or benefit; effect is desirable.</p> <p><b>Neutral</b> – No change compared with baseline conditions and trends.</p> <p><b>Negative</b> – Net loss or adverse effect; effect is undesirable.</p>
Magnitude	The amount of change in measurable parameters or the Indigenous Peoples' value relative to existing conditions.	<p><b>Negligible</b> – No measurable change.</p> <p><b>Low</b> – the net effect may be measurable but represents a small change relative to the existing condition.</p> <p><b>Moderate</b> – The net effect will be measurable but represents a moderate change relative to existing conditions.</p> <p><b>High</b> – The net effect will be measurable to a high degree relative to existing conditions.</p>
Geographic Extent	Refers to the spatial area over which a net effect is expected to occur or can be detected within the Project Footprint, Local Study Area and Regional Study Area.	<p><b>Project Footprint</b> – The net effect is confined to the Project Footprint or Project Development Area.</p> <p><b>Local Study Area</b> – The net effect is confined to the Local Study Area.</p> <p><b>Regional Study Area</b> – The net effect extends beyond the Local Study Area boundary but is confined within the Regional Study Area.</p>
Timing	Indicates the importance of timing (e.g., dates or seasons) of the net effect.	<p><b>Not time sensitive</b> – The net effect is not sensitive to the timing of a Project phase and/or specific Project activity.</p> <p><b>Time sensitive</b> – The net effect is sensitive to the timing of a Project phase and/or specific Project activity.</p>

Characterization Criteria	Description	Definition of Qualitative Categories
Duration	The period of time required until the measurable indicators or the Indigenous Peoples' value returns to its existing (baseline) condition, or the net effect can no longer be measured or otherwise perceived.	<p><b>Short-term</b> – The net effect is restricted to no more than the duration of the construction phase (approximately 5 years).</p> <p><b>Medium-term</b> – The net effect extends through the operations phase of the Project (75-year life cycle).</p> <p><b>Long-term</b> – The net effect extends beyond the operations phase (greater than 75 years).</p> <p><b>Permanent</b> – Recovery to baseline conditions unlikely.</p>
Frequency	Refers to the rate of occurrence of an effect over the duration of the Project or in a specific phase.	<p><b>Infrequent</b> – The net effect is expected to occur rarely.</p> <p><b>Intermittent</b> – The net effect is expected to occur intermittently.</p> <p><b>Continuous</b> – The net effect is expected to occur continually.</p>
Context	Considers sensitivity and resilience of the Indigenous Peoples' value to project related change.	<p><b>High resilience</b> – The value has high resilience or ability to adapt to changes in the measurement indicator and low sensitivity to changes caused by the Project.</p> <p><b>Moderate resilience</b> – The value has a moderate resilience or ability to adapt to changes in the measurement indicator and has moderate sensitivity to potential changes caused by the Project.</p> <p><b>Low resilience</b> – The value has low resilience or ability to adapt to changes in the measurement indicator and is sensitivity to potential changes caused by the Project.</p>
Input from Indigenous Peoples	Views of the Indigenous communities and groups in assigning the criteria to be used and in characterizing the effects.	<p><b>Inputs Received:</b> Inputs received during engagement and consultation, and participation in the EAR/IS process, in assigning the criteria to be used and in characterizing the effects.</p> <p><b>Inputs not Received:</b> No inputs were received during EAR/IS development; or no engagement and consultation occurred during EAR/IS development.</p>
Reversibility	Describes whether a measurable indicator or the Indigenous Peoples' value can return to its existing condition after the project activity ceases.	<p><b>Reversible</b> – The net effect is likely to be reversed after activity completion and rehabilitation.</p> <p><b>Irreversible</b> – The net effect is unlikely to be reversed.</p>
Likelihood of Occurrence	Measure of the likelihood that an activity will result in an effect.	<p><b>Unlikely</b> – The net effect is not likely to occur.</p> <p><b>Possible</b> – The net effect may occur but is not likely.</p> <p><b>Probable</b> – The net effect is likely to occur.</p> <p><b>Certain</b> – The net effect will occur</p>

Potential impacts that were assessed as having a low to high potential to occur were carried forward to Severity Characterization for further assessment. Potential impacts that were assessed as negligible or with no potential to occur were not carried forward in the assessment. The conclusions are based on the following qualitative ranking categories:

- **No impact:** there is **no potential** for the impact to occur. Further assessment is not considered.
- **Negligible:** the potential impact is **unlikely to occur**. Changes to Indigenous Peoples' values are **not detectable**. No mitigation or enhancement measures are necessary. Further assessment is not considered.
- **Low:** the potential impact is **unlikely to occur** and changes to Indigenous Peoples' values **not be detectable** in the absence of mitigation or enhancement measures. Further assessment is not considered
- **Moderate:** the potential impact is **likely to occur** and changes to Indigenous Peoples' values **will be evident** in the absence of mitigation or enhancement measures. The impact is carried forward in the assessment.
- **High:** the potential impact is certain to occur and changes to Indigenous Peoples' values. In the absence of mitigation or enhancement measures. The impact is carried forward in the assessment.

Following the implementation of mitigation measures and enhancement measures, a net effect on the current and historical use of lands and resources for traditional purposes and cultural continuity may remain. The predicted net effects are characterized in the following subsections.

## 1.2.2 Change to Current and Historical Use of Lands and Resources for Traditional Purposes

**Webequie and Other LSA and RSA Communities: Construction Activities → Loss and/or alteration of lands and resources for traditional harvesting → Availability, quality and quantity of traditionally harvested resources**

**Webequie and Other LSA and RSA Communities: Operations and maintenance activities → Loss and/or alteration of lands and resources for traditional harvesting → Availability, quality and quantity of traditionally harvested resources**

Construction activities may increase predator access, and even with mitigation and reclamation efforts, the resulting rise in predation cannot be fully prevented. High predation is the primary threat to caribou in Ontario when their habitats are disturbed, and predators may travel into the RSA throughout the year, although mortality is expected to occur intermittently. There is a probable likelihood of occurrence due to an increased predation during the construction phase and a possible likelihood of occurrence during the operations phase (Table 13-66 and 13-67, Section 13.5.2.1.4 of the EAR/IS). These net effects may indicate a potential reduction in the quantity (death), quality (injury) of caribou available for harvesting.

Construction activities may also impact wolverine habitat (Table 13-72 and 13-74). The loss of functional denning habitat and alteration and degradation of habitat in the LSA due to the construction of the road cannot be mitigated within the LSA, and as such the negative effect of habitat loss is high in magnitude (Section 13.5.2.2.1 of the EAR/IS).

- **Direction: Negative.** Injury or death of caribou is undesirable as a harvested species for First Nations in the LSA and RSA. Habitat loss and habitat alteration and degradation for wolverines is undesirable for First Nations in the LSA and RSA.
- **Magnitude: Moderate.** There will be a measurable moderate effect on the availability of traditionally harvested resources as a result of construction phase and operations phase activities.

- **Geographic Extent: LSA and RSA.** The adverse effect is anticipated to be principally experienced by Webequie First Nation and could affect other LSA and RSA communities.
- **Timing: Not Time Sensitive** with Project activities as predation may occur throughout the year.
- **Duration: Medium term** due to net effects through the construction phase and operations phase of the Project.
- **Frequency: Intermittent to Continuous** Effects on current and historical use of lands for traditional purposes is expected to be intermittent to continuous as Project effects on vegetation and wildlife species are expected to occur during different time periods of the Project.
- **Context: Moderate resilience.** Wildlife species have moderate resilience to stress, are expected to be somewhat sensitive to activities or changes from Project but may have capacity to assimilate to the changes.
- **Input from Indigenous Peoples: Inputs received** – Concerns related to the Project include potential disruptions to traditionally important species, travel routes, movement corridors, and overall species distribution, as well as the impacts of vegetation removal, habitat fragmentation, and accumulated environmental conditions on caribou habitat quality. Questions were raised regarding the use of aerial surveys and aerial photography, along with interest in alternative monitoring methods that reduce disturbance. Additional considerations include the effects of dust on vegetation and associated implications for forage availability, as well as potential sensory disturbances like noise and human presence during construction and operations. Participants noted risks associated with increased road use, including mortality and avoidance behaviour, and emphasized the importance of effective caribou crossings, road controls, and mitigation measures related to the WSR. Broader concerns included the role of legislation in protecting caribou, the cumulative effects of capture-related stressors from multiple regional activities, and the need for robust engagement, follow-up programs, and biodiversity considerations so mitigation measures remain effective throughout the Project lifecycle. Indigenous Knowledge studies highlighted a range of concerns regarding wildlife survival and reproduction, including risks associated with hunting pressure, vehicle collisions, and increased access by non-local harvesters. Community members emphasized that traffic operations may contribute to avoidance behaviours, disrupt migration routes, and elevate noise levels that affect wildlife movements and air quality. Observations noted that wildlife populations, particularly caribou, are already in decline, and that changes to established migration patterns could further challenge the ability of harvesters to locate game. Additional concerns included the potential introduction of new or non-native species driven by climate change, the importance of traditional harvesting areas such as Pagashi Lake and the Kapiskau River where caribou hunting occurs, and the effects of sudden thaws, which can restrict caribou access to key habitats and contribute to population decreases (**Section 13.1.4** of the EAR/IS).
- **Reversibility: Irreversible.** Unlikely to be fully reversed with mitigation measures and revegetation efforts in the ROW.
- **Likelihood of Occurrence: Probable.** After construction, the attraction of predators to the WSR and using the maintained ROW for travel may cause injury and mortality.

**Webequie LSA: Construction activities → Loss of and/or alteration of sites and areas used for traditional harvesting**

**Webequie LSA: Construction activities → Loss of and/or alteration of access to lands and resources used for traditional harvesting**

**Webequie LSA: Operations and maintenance activities → Loss of and/or alteration of sites and areas used for traditional harvesting**

**Webequie LSA: Operations and maintenance activities → Loss of and/or alteration of access to lands and resources used for traditional harvesting**

Construction and operations activities are likely to result in changes to sites and areas used for traditional harvesting by Webequie First Nation within the Project Footprint. This includes sites and areas used for hunting, fishing, trapping, plant gathering, drinking water sources and the habitation sites used by Webequie First Nation. Prior to construction, route refinement may avoid some effects and other mitigation measures may include the rehabilitation of temporary construction areas to minimize the direct loss of or alteration to sites and areas used for traditional harvesting. Road construction may temporarily obstruct land-based routes and water crossing installations may temporarily obstruct water-based routes. Operations activities may also create sensory disturbances which may alter sites and areas for traditional purposes. Mitigations include temporary detours, timing of construction to avoid or reduce impact on land users, ensuring navigation of waterways, advanced notification to the extent possible, dust and noise suppression, water protection measures and monitoring and ongoing Indigenous engagement to adjust operations activities and schedules. Navigation of waterways will be maintained or detours provided during the operations phase. Net effects will be localized to the Project footprint.

- **Direction: Negative.** There will be an adverse effect on sites and areas, and access to lands and resources, used for traditional harvesting due construction phase and operations phase activities.
- **Magnitude: Moderate.** There will be a moderate effect to sites and areas, and access to lands and resources, used for traditional harvesting by Webequie First Nation.
- **Geographic Extent: LSA Webequie First Nation.** The net effect is anticipated to affect the lands within the Project Footprint, and also to the trapline areas, fishing and fish spawning areas and berry gathering areas used by and in Webequie First Nation.
- **Timing: Time Sensitive.** The timing of construction and operations phase activities may coincide with the timing of traditional harvesting activities.
- **Duration: Medium Term.** The effect will take place through the construction phase and operations phase.
- **Frequency: Intermittent.** The net effect will be intermittent through the year.
- **Context: Moderate resilience.** Traditional land-based activities and way of life are very important to Webequie First Nation. The loss or alteration of sites through the operations phase may require Webequie to adapt their locations, method, timing and access routes to lands and resources used in for traditional purposes.
- **Input from Indigenous Peoples:** Inputs received. See **Section 19.3** of the EAR/IS for detailed information.
- **Reversibility: Irreversible.** The effect is likely to be experienced over life of the Project.
- **Likelihood of Occurrence: Probable.** The likelihood of an adverse effect is probable for Webequie First Nation.

### 1.2.3 Change to Cultural Continuity

**Webequie First Nation LSA: Construction activities → Loss and/or alteration of sites and areas used for cultural or spiritual purposes**

**Webequie First Nation LSA: Construction activities → Loss and/or alteration of access to lands and resources used for cultural and spiritual purposes**

**Webequie First Nation LSA: Operations and maintenance activities → Loss and/or alteration of sites and areas used for cultural and spiritual purposes**

**Webequie First Nation LSA: Operations and maintenance activities → Loss and/or alteration of access to lands and resources used for cultural and spiritual purposes**

Construction and operations activities will affect sites and areas used for cultural and spiritual purposes as well as areas with named places or language sites. Activities that produce sensory changes, such as blasting, may disturb these sites as well. The WSR may also restrict access to these sites and areas due to land fragmentation. Road use may improve access for people with mobility issues, such as Elders/seniors, to cultural and spiritual sites and improve the transfer of knowledge and language to younger generations. Community members may create their own trails from WSR to hard-to-reach sites and areas. The WSR may also increase access for non-Indigenous people to these sites and areas. Preserving and maintaining access to these areas is essential for supporting Webequie First Nation's ability to sustain their cultural identity and support the transfer of Indigenous Knowledge and teachings across generations, thereby strengthening cultural continuity (Intergroup, 2025).

Mitigations will help avoid and/or minimize net effects including the avoidance of sites where possible, rehabilitation of temporary construction areas, engagement with the community for detailed locations of cultural and spiritual sites, implementing cultural heritage management protocols, scheduling operations to avoid cultural periods, checkpoints or security check to deter access of non-Indigenous people, and Indigenous led monitoring. These mitigations will reduce the magnitude and geographic extent of net effects. Cultural initiatives and programming to get out onto the land and proactively support traditional teachings and practices to sustain cultural continuity within the communities and strengthen intergenerational knowledge transfer, especially as some culturally and spiritually important sites may become more convenient to access for youths and Elders. However, some of these sites and areas will be permanently lost to Webequie First Nation community members, which may have distinct impacts on youth and their use of Indigenous language as it is inseparable from land-based activities.

- **Direction: Negative and Positive.** Net effects will result in alteration of sites or loss of areas that cannot be avoided during route refinement in Webequie First Nation but is expected to be low in magnitude. The Project will increase access for Webequie community members to cultural and spiritual sites and may also create new trails from the WSR into other or hard-to-access culturally and spiritually important sites and areas, which would increase the positive effects for cultural continuity over the operations phase.
- **Magnitude: Moderate.** The net effect is anticipated to be a low relative change to the number and size of existing cultural and spiritual sites and areas.
- **Geographic Extent: Webequie First Nation LSA:** The effect is anticipated to be experienced primarily by Webequie First Nation.
- **Timing: Time Sensitive** as construction and operations activities may generate noise, dust and other sensory disturbances during periods of cultural activities.
- **Duration: Medium Term.** The net effect will take place through the construction phase and operations phase.
- **Frequency: Intermittent.** The net effect will be intermittent through the year.
- **Context: Moderate resilience.** Webequie First Nation has capacity to adapt (shift timing of visits, use alternative routes, temporary relocation of activities in cultural and spiritual areas) and increase participation in cultural programs to support language and knowledge transfer to the next generation.
- **Input from Indigenous Peoples:** Inputs received. See **Section 19.3** of the EAR/IS for detailed information.
- **Reversibility: Irreversible.** The effect is likely to be experienced over life of the Project.
- **Likelihood of Occurrence: Probable.** The likelihood of an adverse effect is probable for Webequie First Nation.

**Webequie: Construction activities → Expenditures and employment → Change to population and demographics → Change to cultural traditions and practices, including use and preservation of Indigenous languages**

**Webequie: Operations and maintenance activities → Expenditures and employment → Change to population and demographics → Change to cultural traditions and practices, including use and preservation of Indigenous languages**

The Project's construction will include direct employment of 10 members of Webequie First Nation but also add 23-25 Full-Time Employment (FTE) workers from other LSA communities and 37-85 FTE from RSA communities (Section 15.3.1). This shift in Webequie's population and linguistic demographics (28% Oji-Cree, 12% Ojibway, and 60% English; see the EAR/IS Section 14.2.2.1) may influence patterns of social engagement within the community, particularly given that other communities in the LSA have a higher proportion of English speakers (74%), and that the majority of Weenusk First Nation community members speak an n-dialect of the Cree language. Language is a key to cultural identity, cultural continuity, transmission of knowledge and storytelling, land-based activities, and connection to the land. Non-local construction workers from other LSA and RSA communities will travel to construction sites via company operated vehicles, will be restricted to the WSR corridor and designated areas, and will have strict security, access controls, curfew and zero tolerance for drug/alcohol impairment (EAR/IS Section 4.3.3.3). Mitigations include further engagement and development of cultural programs to reinforce language use and fluency, which may be targeted to younger generations, as they play a future role in their households and/or community's leadership. Enhancements may be determined through the development and execution of CRP planning process (see EAR/IS Appendix N).

Construction will also increase employment income and potential temporary changes in Webequie's population (3 direct positions from Webequie First Nation and 13 positions from other LSA communities). No access restrictions to control the movement of workers from other LSA communities have been identified. No net effects including the loss of language were identified in the Social Environment VC (EAR/IS Section 14.5). Overall, the operations phase is expected to result in a negligible impact on cultural traditions and practices, including the use and preservation of Indigenous languages within Webequie First Nation and other LSA and RSA communities.

- **Direction: Negative and Positive.** Mitigation measures may not fully address all changes related to social interactions or population dynamics within Webequie First Nation. However, potential enhancements could include increased income that supports cultural initiatives and language programs, which could be incorporated into employee support policies, along with other mitigations provided in the EAR/IS.
- **Magnitude: Moderate.** In-migration of temporary workers into Webequie First Nation is expected to range from 35-114 workers depending on the season and year (EAR/IS **Table 14-34**) with minimal interaction within the community during the construction phase.
- **Geographic Extent: LSA: Webequie First Nation.** The potential net effect will take place within Webequie First Nation mainly.
- **Timing: Not Time Sensitive** as net effects could be gradual and not specific to cultural or seasonal windows.
- **Duration: Short Term** with the Project's construction phase.
- **Frequency: Intermittent** to possibly **Continuous**, as temporary construction workers will be on a rotation of shift work (14 days in and seven days out) and social interactions in the work setting may be restricted.
- **Context: Moderate resilience.** Webequie First Nation has a strong cultural identity, programming and supports for language revitalization.
- **Input from Indigenous Peoples:** Input received. See Section 19.3 of the EAR/IS for detailed information. Concerns from Webequie Knowledge holders include decline in language amongst younger generations. Disruption to learning Indigenous language is another effect of historical suppression through colonial institutions. Language loss threatens cultural roots and meanings. When Elders leave the community (e.g., for medical care), it also reduces opportunities for language transmission.

- **Reversibility: Reversible.** Construction is temporary and Indigenous language can rebound through programs and opportunities for land-based activities and knowledge transmission from Elders.
- **Likelihood of Occurrence:** Probable. FTE workers from other LSA communities are expected to have limited interaction within Webequie First Nation.

## 1.2.4 Potential Effect Pathways Not Carried Through for Further Assessment

Potential effect pathways with negligible or no Project effect or those which are expected to be eliminated through the implementation of mitigation measures (Section 19.4 of the EAR/IS) are provided below. Potential effects that remain following the implementation of mitigation measures are carried forward for further assessment in **Section 1.2**.

Effect pathways for the current and historical use of lands and resources for traditional purposes and cultural continuity were carried forward for the LSA Webequie First Nation (Section 19.4.5 of the EAR/IS). Net effects for the lands, waters, wildlife, fish and traditionally harvested species including culturally relevant species identified in Species at Risk were assessed as not significant, except for caribou and wolverine. Caribou are a culturally and spiritually important species to First Nations participating in the Project (Section 19.1.2, and Section 13.1.3 of the EAR/IS). Within the caribou RSA, the predicted net effects identified that caribou injury/death due to changes in predator/prey dynamics during the construction and operation phases and were assessed to have a high level of magnitude, be irreversible, and have a probable likelihood of occurrence (Table 13-70 and 13-71 in Section 13.5.2.1 of the EAR/IS). Negative habitat loss and habitat alteration or degradation has been identified to be significant for wolverine (Section 13.6.2 of the EAR/IS). As caribou and wolverine were the only species for which significant net effects remained after mitigation and characterization, they were included in the effects pathway carried forward for both the LSA and RSA communities, reflecting their importance as a traditionally harvested and culturally significant species. The effect pathways on the availability, quality, and quantity of harvested resources due to the loss and/or alteration of lands and resources for harvest due the Project's construction activities were carried forward into the **Section 1.3.1** of the addendum for LSA Webequie First Nation and other LSA and RSA communities (Section 19.3.1.1.1, 19.3.1.2.1 and 19.3.1.3.1 of the EAR/IS).

### 1.2.4.1 Current and Historical Use of Lands and Resources for Traditional Purposes

- Other LSA Communities and RSA:
  - Construction Activities → Loss of and/or alteration of sites and areas used for traditional harvesting.
  - Construction activities → Loss of and/or alteration of access to lands and resources used for traditional harvesting.
  - Operations and maintenance activities → Loss of and/or alteration of sites and areas used for traditional harvesting.
  - Operations and maintenance activities → Loss of and/or alteration of access to lands and resources used for traditional harvesting.

### 1.2.4.2 Cultural Continuity

- Other LSA Communities and RSA:
  - Construction activities → Loss and/or alteration of sites and areas used for cultural and spiritual purposes.

- Construction activities → Loss and/or alteration of access to lands and resources used for cultural and spiritual purposes.
- Operations and maintenance activities → Loss and/or alteration of sites and areas used for cultural and spiritual purposes.
- Operations and maintenance activities → Loss and/or alteration of access to lands and resources used for cultural and spiritual purposes.
- Operations and maintenance activities → Expenditures and employment → Change to population and demographics → Change to cultural traditions and practices, including use and preservation of Indigenous languages.

## 1.2.5 Determination of Significance

For the Current and Historical Use of Lands and Resource for Traditional Purposes value, the following effect pathways were carried forward to assessment of cumulative effects:

- **LSA: Webequie First Nation and Other LSA Communities, and RSA Communities:** Construction Activities → Loss and/or alteration of lands and resources for traditional harvesting → Availability, quality and quantity of traditionally harvested resources.
- **LSA: Webequie First Nation and Other LSA Communities, and RSA Communities:** Operations and maintenance activities → Loss and/or alteration of lands and resources for traditional harvesting → Availability, quality and quantity of traditionally harvested resources.
- **LSA Webequie First Nation:** Construction activities → Loss of and/or alteration of sites and areas used for traditional harvesting.
- **LSA Webequie First Nation:** Operations and maintenance activities → Loss of and/or alteration of sites and areas used for traditional harvesting.
- **LSA Webequie First Nation:** Construction activities → Loss of and/or alteration of access to lands and resources used for traditional harvesting.
- **LSA Webequie First Nation:** Operations and maintenance activities → Loss of and/or alteration of access to lands and resources used for traditional harvesting.

For the Cultural Continuity value, the following effect pathways were carried forward to assessment of cumulative effects:

- **LSA Webequie First Nation** Construction activities → Loss and/or alteration of sites and areas used for cultural or spiritual purposes.
- **LSA Webequie First Nation** Construction activities → Loss and/or alteration of access to lands and resources used for cultural and spiritual purposes.
- **LSA Webequie First Nation** Operations and maintenance activities → Loss and/or alteration of sites and areas used for cultural and spiritual purposes.
- **LSA Webequie First Nation** Operations and maintenance activities → Loss and/or alteration of access to lands and resources used for cultural and spiritual purposes.
- **LSA Webequie First Nation** Construction activities → Expenditures and employment → Change to population and demographics → Change to cultural traditions and practices, including use and preservation of Indigenous languages.

**Table 1-2** summarizes the predicted net effects on Indigenous People values.

**Table 1-2: Summary of Predicted Net Effects on Current and Historical Use of Lands and Resources Used for Traditional Purposes, and Cultural Continuity**

Predicted Net Effect	Net Effects Characterization										
	Project Phase	Direction	Magnitude	Geographic Extent	Timing	Duration	Frequency	Context	Reversibility	Likelihood of Occurrence	Predicted Net Effect
Change in Current and Historical use of Lands and Resources for Traditional Purposes: Availability, quality and quantity of traditionally harvested resources.	Construction and Operations	Negative	Moderate	LSA and RSA	Not Time Sensitive	Medium Term	Intermittent to Continuous	Moderate resilience	Irreversible	Probable	Yes carried forward (Net effect)
Change in Current and Historical use of Lands and Resources for Traditional Purposes: Loss of and/or alteration of sites and areas and access to lands used for traditional harvesting.	Construction and Operations	Negative	Moderate	LSA: Webequie First Nation	Time Sensitive	Medium Term	Intermittent	Moderate resilience	Irreversible	Probable	Yes carried forward (Net effect)
Change to Cultural Continuity: Loss and/or alteration of sites and areas and access to lands and resources used for cultural and spiritual purposes.	Construction and Operations	Positive and Negative	Moderate	LSA: Webequie First Nation	Time Sensitive	Medium Term	Intermittent	Moderate resilience	Irreversible	Probable	Yes carried forward (Net effect)
Change to Cultural Continuity: Change to cultural traditions and practices, including use and preservation of Indigenous languages.	Construction and Operations	Positive and Negative	Moderate	LSA: Webequie First Nation	Not Time Sensitive	Short Term	Intermittent to Continuous	Moderate resilience	Reversible	Probable	Yes carried forward (Net effect)

## 1.3 Cumulative Effects Assessment

### 1.3.1 Characterization of Cumulative Effects

Section 21 of the EAR/IS presented the cumulative effects assessment, with the exception of current and historical use of lands and resources for traditional purposes and cultural continuity, which is presented in **Section 1.3** of this Appendix, following the characterization of net effects of the Project on current and historical use of lands and resources for traditional purposes and cultural continuity in **Section 1.2**. The results of the characterization of net effects of the Project, as well as the characterization of net cumulative effects were used to inform the assessment of potential impacts on Aboriginal and Treaty Rights, presented in the Addendum.

The approach used for conducting the cumulative effects assessment is described in Section 21.3 of the EAR/IS. The steps used to assess cumulative effects included the following:

- Identification and characterization of net effects of the Project for each Indigenous Peoples' value;
- Definition of spatial and temporal boundaries for each Indigenous Peoples' value where potential net adverse effects have been identified for the Project;
- Identification of potential net adverse effects of the Project that may interact, overlap or act in combination with net effects of past, present, reasonably foreseeable development (RFDs) and future activities;
- Identification of the potential cumulative adverse effects;
- Development of additional technically and economically practical mitigation measures, if warranted, and predict likelihood net cumulative effects;
- Evaluation/Characterization of predicted net cumulative adverse effect(s);
- Determination of the significance of the predicted net cumulative adverse effects; and
- Identification of follow-up monitoring, if required.

As noted in Section 21.3 of the EAR/IS, in accordance with Section 22 of the TISG, the cumulative effects assessment considers the cumulative effects on Indigenous Peoples' values that may affect Indigenous Peoples and the exercise of their Aboriginal and Treaty Rights, and comments and issues of concern from the engagement and consultation with potentially affected Indigenous communities are integrated into the cumulative effects assessment (refer to Appendix A).

As noted in Section 21.3 of the EAR/IS, the TISG (Section 22) identified the projects or activities that are to be considered in the cumulative effects assessment. WSR and activity inclusion list (refer to Section 21.3.4) presents known past, present and RFDs and future activities that could overlap spatially and temporally with the net environmental, health, social or economic effects of the Project.

In keeping with the cumulative effects assessment approach described in Section 21.3 of the EAR/IS, the following conditions needed to be met to initiate the assessment of cumulative effects on current and historical use of lands and resources for traditional purposes and cultural continuity.

- The Project is predicted to have net adverse effects on current and historical use of lands and resources for traditional purposes and/or cultural continuity.
- The net adverse effects from the Project overlap spatially and/or temporally with net adverse effects of other past, present and RFDs or physical activities on current and historical use of lands and resources for traditional purposes and/or cultural continuity.

- The net adverse effects from the Project are characterized as having a greater than low magnitude within the current and historical use of lands and resources for traditional purposes and cultural continuity Regional Study Area (RSA) and likelihood of occurrence of probable or certain. In addition, where feedback from Indigenous communities on potential net adverse effects was received, this information may have influenced the decision to carry forward the value to the cumulative effects assessment.

**Table 1-3**, below presents the inclusion list of other projects or physical activities considered in the cumulative effects assessment. The cumulative effects assessment for current and historical use of lands and resources for traditional purposes and cultural continuity only included those RFDs or physical activities having the temporal and spatial potential to contribute to cumulative effects on that value.

**Table 1-3: Other Projects or Physical Activities Considered**

ID No.	Project Name or Physical Activity and Project or Activity Type	ID No.	Project Name or Physical Activity and Project or Activity Type
<b>Past, Present or Ongoing Projects or Physical Activities</b>			
1	DeBeers' Victor Mine – Mining	10	Forest management units (FMUs) – Forest Management
2	Orla Mining Ltd.'s Musselwhite Mine (formerly Goldcorp's Musselwhite Mine) – Mining	11	Webequie First Nation – Nursing Station Bulk Fuel Storage Upgrades – Community Infrastructure
3	Equinox Gold Corp.'s Greenstone Mine (formerly Greenstone Gold's Hardrock Mine) – Mining	12	Kasabonika Lake New 7 – 12 school– Community Infrastructure
4	Construction of upgrades to the Anaconda and Painter Lake Forestry Access Roads – All-Season road	13	Kingfisher Lake First Nation K4-10 School– Community Infrastructure
5	Wataynikaneyap Transmission Project (also known as New Transmission Line to Pickle Lake) – Power Transmission	14	Kingfisher Lake First Nation Subdivision Phase 2– Community Infrastructure
6	Ogoki Diversion – Hydroelectric	15	Neskantaga First Nation New Construction of an 8-plex teachers' residence– Community Infrastructure
7	Long Lac Diversion – Hydroelectric	16	Wapekeka First Nation New School Project– Community Infrastructure
8	Rapid Lynx Broadband Project (Phase 1) <sup>3</sup> – Telecommunication	17	Wunnumin H1RCI Compound Construction– Community Infrastructure
9	New Fibre Installation / Upgrade Multiple Towers at various locations in Pikangikum First Nation, Cat Lake First Nation, and Kasabonika First Nations: Bearskin Lake; Big Trout Lake; Cat Lake; Deer Lake; Kasabonika Lake; Kewaywin; Kingfisher Lake; Muskrat Dam; North Spirit Lake; Pikangikum; Poplar Hill; Sachigo Lake; Sandy Lake; Slate Falls; Wapekeka (Angling Lake); Wawakepewin; Weagamow; and Wunnumin Lake - Telecommunication	18	Wunnumin Lake First Nation Teacherages Project– Community Infrastructure

ID No.	Project Name or Physical Activity and Project or Activity Type	ID No.	Project Name or Physical Activity and Project or Activity Type
<b>Future Reasonably Foreseeable Developments and Physical Activities That Will Likely Be Carried Out</b>			
19	Black Horse Project and Big Daddy Project – Mining	30	Juno Corporation Mining Exploration Activity – Mineral Exploration Activity
20	Eagle’s Nest Project – Mining	31	Northern Star Eagle Limited and Southern Star Eagle Limited Drilling Program - Mineral Exploration Activity
21	Marten Falls Community Access Road Project – All Season Road	32	Development of 10 Lot Residential Subdivision on Eabametoong First Nation – Community Infrastructure
22	Northern Road Link Project – All Season Road	33	Kasabonika Lake First Nation Band Representative Facility – Community Infrastructure
24	East-West Road <sup>4</sup> – All Season Road	34	Neskantaga Community Recreation Centre – Community Infrastructure
25	Kashechewan First Nation Road to Site 5 Project – All Season Road	35	Kinonjeoshtegon-CHRT 41-CFS Centre and Associated Building-P048401-2425– Community Infrastructure
26	Hydroelectric generation and transmission connection development opportunities in Albany and Attawapiskat Rivers area – Hydroelectric and Power Transmission	36	Kitchenuhmaykoosib Inninuwug Wastewater System Upgrades & Expansion– Community Infrastructure
27	Rapid Lynx Broadband Project (Phase 2) – Telecommunication	37 38 39	Transportation of ore from future development near the Project for processing, once past the Webequie Supply Road, potentially involving the following: <ul style="list-style-type: none"> <li>▪ Ferrochrome Production Facility (proposed);</li> <li>▪ Sudbury Smelter (existing);</li> <li>▪ Road from Nakina to Ferrochrome Facility and Sudbury Smelter (existing); and</li> <li>▪ Road Traffic.</li> </ul>
28	Forest management units (FMUs) – Forest Management	-	Winter Roads – Increased winter road traffic by future mining proponents – Road Traffic
29	Black Thor, Blackbird, and Black Label Mineral deposits – Mineral Exploration Activity	-	Climate Change – Human Induced Hazard

### 1.3.2 Past, Present and Ongoing Effects

Following the “Interim Cumulative Effects Assessment Guidance Document,” past, present, and ongoing RFDs and activities are considered to define existing conditions for cumulative effects. As such, the existing conditions outlined in Section 19 for the Indigenous Peoples values presently reflect the effects from these projects and activities within the RSA. Table 21-2 in Section 21 of the EAR/IS identifies the projects and activities (IDs 1 to 18) and indicates where their effects spatially overlap with the RSA and the Project’s net effects on Indigenous Peoples values’. The cumulative effects assessment for Indigenous People’s current and historical use of land and resources for traditional purposes and cultural continuity is focused on integrating the Project’s net adverse effects with those of future RFDs and activities discussed in Section 21.4.3.2.

### 1.3.3 Other Ongoing and Reasonably Foreseeable Projects or Activities

A list of the RFDs and activities that were considered for the cumulative effects assessment are presented in Table 21-2 (Section 21 in the EAR/IS). Among the projects and activities listed in Table 21-2, only those found in **Table 1-4** are considered likely to occur within, and potentially impact, the RSA for the Indigenous Peoples' values. These projects may contribute to cumulative effects within the RSA. For a complete of RFDs please refer to **Table 7-1** of the Addendum.

The following RFDs in **Table 1-4** include relevant VC and subcomponents that would support the current and historical use of lands and resources for traditional purposes value and cultural continuity. The selected relevant VCs include surface water resources, fish and fish habitat, vegetation and wetlands, wildlife and wildlife habitat (selected species traditionally harvested including moose, furbearers, and waterfowl), and species at risk (selected species traditionally harvested including caribou and lake sturgeon), and social environment.

**Table 1-4: Current and Historical use of Lands and Resources for Traditional Purposes and Resource Use and Cultural Continuity – RFDs or Future Activities in the RSA**

ID	RFD or Activity	Spatial Overlap of Net Effects	Temporal Overlap of Net Effects	Included in Cumulative Effects Analysis
8	Rapid Lynx Broadband Project (Phase 1)	Yes	Yes	Yes
19	Black Horse Project and Big Daddy Project	Yes	Yes	Yes
20	Eagle's Nest Project	Yes	Yes	Yes
21	Marten Falls Community Access Road Project	Yes	Yes	Yes
22	Northern Road Link Project	Yes	Yes	Yes
24	East-West Road	Yes	Yes	Yes
27	Rapid Lynx Broadband Project (Phase 2)	Yes	Yes	Yes
29	Black Thor, Blackbird, and Black Label Mineral deposits	Yes	Yes	Yes
30	Juno Corporation Mining Exploration Activity	Yes	Yes	Yes
31	Northern Star Eagle Limited and Southern Star Eagle Limited Drilling Program	Yes	Yes	Yes
-	Winter Roads - Increased winter road traffic by future mining proponents	Yes	Yes	Yes
-	Climate Change	Yes	Yes	Yes

### 1.3.4 Cumulative Effects

Cumulative effects may occur where the Project and other RFDs or activities interact within the RSA boundary of Indigenous Peoples' values. The cumulative effects to current and historical use of lands and resources for traditional purposes and cultural continuity values may occur due to Project and RFDs and activities that overlap spatially and temporally.

The RFDs included in the cumulative effects analysis for the current and historical use of lands and resources for traditional purposes and cultural continuity values includes:

- Rapid Lynx Broadband Project (Phase 1 and Phase 2);
- Black Horse Project and Big Daddy Project;
- Eagle's Nest Project;
- Marten Falls Community Access Road;
- Northern Road Link Project;
- East-West Road;
- Rapid Lynx Broadband Project (Phase 2);
- Black Thor, Blackbird, and Black Label Mineral Deposits;
- Juno Corporation Mining Exploration Activity;
- Northern Star Eagle Limited and Southern Star Eagle Limited Drilling Program;
- Winter Roads; and
- Climate Change.

Woodland caribou are a culturally and traditionally important species to Webequie First Nation, and for other LSA and RSA communities. Project effects to caribou include habitat loss and alteration/degradation, sensory disturbances, alterations in movement and injury/death due to changes in predator/prey dynamics. The net effects of other mining and transportation RFDs were described as having similar potential net effects assuming similar regulatory requirements on woodland caribou (Section 21.4.1.8.3 of the EAR/IS). Climate change may further affect caribou movement by altering snow depth, ice cover, and seasonal resource distribution, reducing connectivity, and increasing predation risk. Grey wolves have shown to increase their hunting efficiency along linear features, contributing to higher caribou mortality (James & Stuart-Smith, 2000; Fryxell et al., 2020). Transportation RFDs and access roads associated with mining RFDs could also increase caribou injury/mortality. The cumulative effects for caribou were determined to be significant (Section 21.4.8.1.6 of the EAR/IS).

Wolverine are also important culturally and traditionally to Webequie First Nation, and for other LSA and RSA communities. Project effects to wolverine include habitat loss and habitat alteration/degradation, sensory disturbance, alterations in movement and injury/death. The construction of the road has the potential for direct and indirect effects that could cause the loss of wolverine habitat through physical alteration and removal of suitable habitat, resulting from vegetation clearing activities and disturbance during construction and throughout operations. After the implementation of mitigation measures, road operations are also expected to result in alterations in wolverine movement. While traffic levels are expected to be low, wolverines are likely to experience a net negative effect due to sensory disturbance from road operation. Other RFDs would also result in alteration of wolverine movement due to sensory disturbance (Section 21.4.8.2.3 of the EAR/IS). The cumulative effects for wolverine were determined to be significant (Section 12.4.8.2.6 of EAR/IS).

Noise, dust, and other sensory disturbances generated during construction and operations can be scheduled and managed to avoid or reduce impacts on land-based cultural practices. However, noise from road use and increased human presence may lead to caribou avoidance of the area, including habitat that would otherwise be suitable for nursery use. This may affect the availability of caribou in the RSA during the construction and operations of RFDs. Even with mitigation, there is a predicted net adverse effect on caribou (Section 21.4.8.1.3 of the EAR/IS).

The Project and other transportation, broadband and mining RFDs may result in the loss and/or alteration of sites and areas used for traditional, cultural and spiritual purposes. Within the construction footprints of RFDs, similar construction activities to the Project would take place including vegetation clearing, ground disturbance, road/access road development, supportive infrastructure development such as the use of aggregate deposits. The results of these activities would have a similar net effect on the loss and/or alteration of these lands and resources. Similar mitigations are assumed to be implemented to minimize the impact of the construction footprint, engage Indigenous communities, and coordinate the use of aggregate or blasting around cultural and spiritual time periods. The effects of the loss and/or alteration of sites and areas for cultural and spiritual purposes including the use and preservation of language may have a gradual or fluctuating net effect as the construction timelines of the mining RFDs (and to an extent the transportation RFDs) are unknown. The net effects of the Project and the RFDs may result in a moderate level of change in the lands and resources used for traditional, cultural and spiritual purposes.

RFDs may also result in displacement or fragmentation of lands which may temporarily or permanently affect land and water-based access routes. Waterways are considered an ancient travel corridors that connect to traditional areas and other communities. RFD construction over waterways may temporarily block navigation of water and require a community representative for monitoring. Mitigation measures are assumed to be similar and require navigation to continue through construction and operations phases. Advanced notification and coordination of impacts to waterways and adjusting the timing of construction activities during period of fish harvesting will reduce the adverse impacts to Webequie First Nation's cultural and spiritual relationship with water. The predicted net effect of the Project and RFDs on access routes are anticipated to be eliminated with the implementation of mitigations.

During the 75-year operations phase, road use is expected to provide access to employment opportunities at the mining RFDs. This may increase exposure to English as it is a predominant language in households and within industry. The Mining Industry Human Resources Council (MIHR) advises flexible employment options and accommodations to enable cultural participation, integration of inclusionary strategies such as language commitments (MIHR, 2023). An Indigenous association and academic partnership identified the adoption of UNDRIP framework to corporate policies and operations of mining industry to apply its principles, norms and standards as it involves Indigenous lands, and resources (Law, 2025). This would support Truth and Reconciliation Commission Call to Action #92. Incorporating a comprehensive employment policy that permits Webequie First Nation community members employment, security and participation in traditional activities, as each stage of life has different responsibilities and roles in the community and land-based activities may take place across each season. With the implementation of mitigations that support equitable access to employment, the predicted net effect on the use and preservation of Indigenous language is negligible over the long-term.

First Nation employment in the broadband RFDs may not have a net effect related to the exposure and use of English as it is a First Nations-owned company and assumed its operations allow for Indigenous cultural practices.

Road use of the Project, the transportation RFDs and access roads of the mining RFDs may increase opportunities for land-based cultural and traditional activities which can support the use of Indigenous language. Road use may increase access for Elders and land users to traditional and cultural areas and support knowledge transfer and use of Indigenous language. However, road use concerns related to "outsiders" access into traditional territories were also identified by First Nations, which could result in the loss or alteration of sites and areas of traditional, cultural and spiritual importance. Checkpoints, security checks, tribal policy enforcement and other deterrents are recommended to restrict access on roads to minimize incidents. With the implementation of these mitigations and employment restrictions of non-locals at mining RFDs, social engagement with "outsiders" is predicted to be low but may incur gradual fluctuations over the long-term.

The winter road to Webequie also overlaps with sites and areas of cultural, spiritual and linguistic importance. Potential effects of climate change on winter roads could restrict safe access, undermine burial grounds, wash out trails, increase or decrease water levels, and affect the sacred caribou calving areas. The winter road to Webequie is “extremely vulnerable” to climate change (Zhang et al, 2024) and the winter road season has been shortening due to more warm spells and higher than average temperatures (CBC News 2023a, 2023b). Climate change may also affect caribou as extreme weather events and changing weather patterns can affect the availability and quality of caribou habitat, forage available, connectivity to new or suitable habitats, and potential increase in predation risk. The net effects could result in reduced availability of caribou in the RSA. Mining RFDs may replace operations requiring diesel with renewable sources and other initiatives to reduce impact on climate change, however, air emissions spread out over distances and are less likely to cause noticeable combined effects (Section 21.4.4.5 of the EAR/IS).

**Table 1-5: Summary of Cumulative Effects on Current and Historical use of Lands and Resources for Traditional Purposes, and Cultural Continuity**

ID	RFD or Activity	Potential Cumulative Effects	Spatial / Temporal Considerations and Effect Pathways	Potential Change	Relative Change in the RSA
8	Rapid Lynx Broadband Project (Phase 1)	Current and historical use of lands and resources for traditional purposes and Cultural Continuity	Rapid Lynx Phase 1 activities are assumed to overlap spatially with the Project within the RSA. Ground disturbance is localized and linear, with limited vegetation clearing and installation of buried or surface infrastructure. Construction is short-term and typically coordinated to minimize disruption.	<ul style="list-style-type: none"> <li>▪ Loss and/or alteration of culturally and spiritually important sites and areas; and</li> <li>▪ Loss and/or alteration of access to lands and resources.</li> </ul>	Low
19	Black Horse Project and Big Daddy Project	Current and historical use of lands and resources for traditional purposes and Cultural Continuity	<p>The Black Horse and Big Daddy Projects are assumed to temporally and spatially overlap with Project activities based on the information available.</p> <p>The Black Horse and Big Daddy projects are at a conceptual/feasibility level of design and no information is available on their construction footprint at this time. Activities associated with ongoing mineral exploration or potential future mine development have similar pathways as those arising from the Project, including vegetation removal, ground disturbance, water crossings, and use of aggregate sources. During operations, employment and increased access may indirectly influence cultural continuity.</p> <p>During operations Black Horse and Big Daddy projects may employ LSA and RSA community members, which may influence the use or preservation of Indigenous language.</p>	<ul style="list-style-type: none"> <li>▪ Loss and/or alteration of culturally and spiritually important sites and areas;</li> <li>▪ Loss and/or alteration of access to lands and resources; and</li> <li>▪ Indirect changes to cultural continuity including use and preservation of Indigenous language.</li> </ul>	Moderate
20	Eagle's Nest Project	Current and historical use of lands and resources for traditional purposes and Cultural Continuity	<p>The Eagle's Nest Project is assumed to temporally and spatially overlap with Project activities based on the information available.</p> <p>The Eagle's Nest Project is at a conceptual/feasibility level of design and no information is available on their construction footprint at this time. Activities associated with ongoing mineral exploration or potential future mine development have similar pathways as those arising from the Project, including vegetation removal, ground disturbance, water crossings, and use of aggregate sources. During operations, employment and increased access may indirectly influence cultural continuity.</p> <p>During operations Eagle's Nest project may employ LSA and RSA community members, which may influence the use or preservation of Indigenous language.</p>	<ul style="list-style-type: none"> <li>▪ Loss and/or alteration of culturally and spiritually important sites and areas;</li> <li>▪ Loss and/or alteration of access to lands and resources; and</li> <li>▪ Indirect changes to cultural continuity including use and preservation of Indigenous language.</li> </ul>	Moderate

ID	RFD or Activity	Potential Cumulative Effects	Spatial / Temporal Considerations and Effect Pathways	Potential Change	Relative Change in the RSA
21	Marten Falls Community Access Road Project	Current and historical use of lands and resources for traditional purposes and Cultural Continuity	<p>The MFCAR is assumed to temporally and spatially overlap with Project activities based on the information available.</p> <p>MFCAR construction activities have similar pathways as those arising from the Project, including removal of vegetation, construction activities to construct WSR including water crossings, and installation and use of supportive infrastructure such as aggregate sites.</p> <p>During operations, public or 'outsider' access may be a concern, as community members, which may influence the use or preservation of Indigenous language.</p>	<ul style="list-style-type: none"> <li>▪ Loss and/or alteration of culturally and spiritually important sites and areas;</li> <li>▪ Loss and/or alteration of access to lands and resources; and</li> <li>▪ Indirect changes to cultural continuity including use and preservation of Indigenous language.</li> </ul>	Moderate
22	Northern Road Link Project	Current and historical use of lands and resources for traditional purposes and Cultural Continuity	<p>The NRL Project is assumed to temporally and spatially overlap with Project activities based on the information available.</p> <p>NRL construction activities have similar pathways as those arising from the Project, including removal of vegetation, construction activities to construct WSR including water crossings, and installation and use of supportive infrastructure such as aggregate sites.</p> <p>During operations, public or 'outsider' access may be a concern, as community members, which may influence the use or preservation of Indigenous language.</p>	<ul style="list-style-type: none"> <li>▪ Loss and/or alteration of culturally and spiritually important sites and areas;</li> <li>▪ Loss and/or alteration of access to lands and resources; and</li> <li>▪ Indirect changes to cultural continuity including use and preservation of Indigenous language.</li> </ul>	Moderate
24	East-West Road	Current and historical use of lands and resources for traditional purposes and Cultural Continuity	<p>The East-West Road Project is assumed to temporally and spatially overlap with Project activities based on the information available.</p> <p>East-West Road construction activities have similar pathways as those arising from the Project, including removal of vegetation, construction activities to construct WSR including water crossings, and installation and use of supportive infrastructure such as aggregate sites.</p> <p>During operations, public or 'outsider' access may be a concern, as community members, which may influence the use or preservation of Indigenous language. During operations, public or 'outsider' access may be a concern, as community members, which may influence the use or preservation of Indigenous language.</p>	<ul style="list-style-type: none"> <li>▪ Loss and/or alteration of culturally and spiritually important sites and areas;</li> <li>▪ Loss and/or alteration of access to lands and resources; and</li> <li>▪ Indirect changes to cultural continuity including use and preservation of Indigenous language.</li> </ul>	Moderate

ID	RFD or Activity	Potential Cumulative Effects	Spatial / Temporal Considerations and Effect Pathways	Potential Change	Relative Change in the RSA
27	Rapid Lynx Broadband Project (Phase 2)	Current and historical use of lands and resources for traditional purposes and Cultural Continuity	Rapid Lynx Phase 2 activities are assumed to overlap spatially with the Project within the RSA. Ground disturbance is localized and linear, with limited vegetation clearing and installation of buried or surface infrastructure. Construction is short-term and typically coordinated to minimize disruption.	<ul style="list-style-type: none"> <li>▪ Loss and/or alteration of culturally and spiritually important sites and areas; and</li> <li>▪ Loss and/or alteration of access to lands and resources.</li> </ul>	Low
29	Black Thor, Blackbird, and Black Label Mineral deposits	Current and historical use of lands and resources for traditional purposes and Cultural Continuity	<p>The Black Thor, Blackbird, and Black Label Mineral deposits projects are assumed to temporally and spatially overlap with Project activities based on the information available.</p> <p>The Black Thor, Blackbird, and Black Label Mineral deposits projects are at a conceptual/feasibility level of design, and no information is available on their construction footprint at this time. Activities associated with ongoing mineral exploration or potential future mine development have similar pathways as those arising from the Project, including vegetation removal, ground disturbance, water crossings, and use of aggregate sources. During operations, employment and increased access may indirectly influence cultural continuity.</p> <p>During operations Black Thor, Blackbird, and Black Label Mineral deposits projects may employ LSA and RSA community members, which may influence the use or preservation of Indigenous language.</p>	<ul style="list-style-type: none"> <li>▪ Loss and/or alteration of culturally and spiritually important sites and areas;</li> <li>▪ Loss and/or alteration of access to lands and resources; and</li> <li>▪ Indirect changes to cultural continuity including use and preservation of Indigenous language.</li> </ul>	Low
30	Juno Corporation Mining Exploration Activity	Current and historical use of lands and resources for traditional purposes and Cultural Continuity	<p>The Juno Corporation Mining Exploration Activity are assumed to temporally and spatially overlap with Project activities based on the information available.</p> <p>The Juno Corporation Mining project is at a conceptual/feasibility level of design, and no information is available on their construction footprint at this time.</p> <p>Activities associated with ongoing mineral exploration or potential future mine development have similar pathways as those arising from the Project, including vegetation removal, ground disturbance, water crossings, and use of aggregate sources. During operations, employment and increased access may indirectly influence cultural continuity.</p> <p>During operations Juno Corporation Mining Exploration activities may employ LSA and RSA community members if development proceeds to operations, which may influence the use or preservation of Indigenous language.</p>	<ul style="list-style-type: none"> <li>▪ Loss and/or alteration of culturally and spiritually important sites and areas;</li> <li>▪ Loss and/or alteration of access to lands and resources; and</li> <li>▪ Indirect changes to cultural continuity including use and preservation of Indigenous language.</li> </ul>	Low

ID	RFD or Activity	Potential Cumulative Effects	Spatial / Temporal Considerations and Effect Pathways	Potential Change	Relative Change in the RSA
31	Northern Star Eagle Limited and Southern Star Eagle Limited Drilling Program	Current and historical use of lands and resources for traditional purposes and Cultural Continuity	<p>The Northern Star Eagle Limited and Southern Star Eagle Limited Drilling Program are assumed to temporally and spatially overlap with Project activities based on the information available.</p> <p>The Northern Star Eagle Limited and Southern Star Eagle Limited Drilling program is at a conceptual/feasibility level of design, and no information is available on their construction footprint at this time.</p> <p>Activities associated with ongoing mineral exploration or potential future mine development have similar pathways as those arising from the Project, including vegetation removal, ground disturbance, water crossings, and use of aggregate sources. During operations, employment and increased access may indirectly influence cultural continuity.</p> <p>During operations Northern Star and Eagle Limited, and Southern Star and Eagle Limited Drilling program activities may employ LSA and RSA community members if development proceeds to operations, which may influence the use or preservation of Indigenous language.</p>	<ul style="list-style-type: none"> <li>▪ Loss and/or alteration of culturally and spiritually important sites and areas;</li> <li>▪ Loss and/or alteration of access to lands and resources; and</li> <li>▪ Indirect changes to cultural continuity including use and preservation of Indigenous language.</li> </ul>	Low
-	Winter Roads - Increased winter road traffic by future mining proponents	Current and historical use of lands and resources for traditional purposes and Cultural Continuity	Winter road to Webequie potentially overlaps with culturally and spiritually important places and language sites. Climate change is shortening the winter road season, reducing safe access and reliability. Increased traffic from other RFDs may compound access challenges.	<ul style="list-style-type: none"> <li>▪ Loss and/or alteration of culturally and spiritually important sites and areas; and</li> <li>▪ Loss and/or alteration of access to lands and resources.</li> </ul>	Moderate
-	Climate Change	Current and historical use of lands and resources for traditional purposes and Cultural Continuity	Climate change may alter hydrology, wash out trails, reduce ice safety, affect caribou calving areas, and impact culturally, spiritually, and linguistically important sites and access routes throughout the RSA.	<ul style="list-style-type: none"> <li>▪ Loss and/or alteration of culturally and spiritually important sites and areas; and</li> <li>▪ Loss and/or alteration of access to lands and resources.</li> </ul>	Moderate

### 1.3.5 Mitigation for Cumulative Effects

Mitigations for the Project are described in the EAR/IS Section 19.4 and Section 13.4 for caribou and wolverine, and Section 21.4.8. Mitigation measures for effects to caribou and wolverine are associated with specific construction and operations phases of the Project, and which are applicable to other RFDs or future activities within the RSA. It is assumed that other projects, RFDs and future potential projects or activities will be required to have the same or similar standards.

For cultural continuity, there are potential cumulative effects with other RFD near the Project including the risk of compounding effects on vulnerable groups including Indigenous women and girls, 2SLGBTQQIA+ individuals, youth, and Elders, in particular in the Webequie First Nation. Webequie First Nation and proponents of the RFDs should consider broader strategies that anticipate long-term pressures and enhance local services for Webequie First Nation. The coordinated application of mitigation measures across various projects along with continuous monitoring can “limit cumulative adverse net effects” (InterGroup, 2025).

The CRP for the Project offers a key framework for supporting this type of coordinated, long-term planning (Appendix N of the EAR/IS) and addressing potential adverse cumulative effects. The CRP outlines priorities and strategies that are not only specific to the WSR but are also applicable to other foreseeable developments in the area. Additional recommendations for mitigation and enhancement take into consideration the Truth and Reconciliation Commission of Canada’s Calls to Action and National Inquiry into Missing and Murdered Indigenous Women and Girls Calls to Justice, including calls to action on health, justice, culture, and human security (TRCC, 2015; NIMMIWG, 2019).

### 1.3.6 Characterization of Net Cumulative Effects

The net cumulative effects on current and historical use of lands and resources for traditional purposes, and cultural continuity are characterized by the combined and overlapping interactions of the Project and other RFDs, including mining, transportation, broadband infrastructure, winter roads, and climate change, within the RSA. These effects arise where multiple activities interact spatially and temporally, resulting in incremental changes to lands, resources, access routes, and the social and cultural conditions that support Indigenous land-based practices and cultural continuity.

The net cumulative effects on current and historical use of lands and resources for traditional purposes are anticipated to include the availability, quality and quantity of traditionally harvested resources, loss of and/or alteration of sites and areas used for traditional harvesting and loss of and/or alteration of access to lands and resources used for traditional harvesting. The net cumulative effects on cultural continuity are anticipated to include loss and/or alteration of sites and areas used for cultural and spiritual purposes, loss and/or alteration of access to lands and resources used for cultural and spiritual purposes and change to cultural traditions and practices, including use and preservation of Indigenous languages.

See **Table 1-6** for the characterization of predicted net cumulative effects.

### 1.3.7 Determination of Significance

The determination of significance of net cumulative effects on the Indigenous Peoples’ values is based on the process of significance determination outlined in Section 5.2.6 of the Final EAR/IS. A predicted net cumulative effect is considered significant if the effect is assessed as moderate to high in magnitude, medium- to long-term in duration, as well as being identified as a key concern by Indigenous communities, and / or where additional management may be needed.

Based on the results in **Table 1-6**, the net cumulative effects on current and historical use of lands and resources for traditional purposes and cultural continuity are considered to be significant.

**Table 1-6: Indigenous Peoples' Values – Characterization of Predicted Net Cumulative Effects**

Predicted Net Cumulative Effect	Characterization Criteria								
	Direction	Magnitude	Geographic Extent	Timing	Duration	Frequency	Context	Reversibility	Likelihood of Occurrence
Change in Current and Historical use of Lands and Resources for Traditional Purposes	Negative	Moderate	RSA	Not Time Sensitive	Medium Term	Continuous	Low Resilience	Irreversible	Probable
Cultural Continuity	Negative	Moderate	RSA	Not Time Sensitive	Medium Term	Continuous	Low Resilience	Irreversible	Probable

## 1.4 Prediction of Confidence in the Assessment

The level of confidence in net effect predictions in assessments depends on the degree of uncertainty associated with the basis for the determination of significance. Uncertainty is influenced by factors such as the adequacy of available data, the level of knowledge and understanding about the Indigenous Peoples' values being assessed, the characteristics of the proposed Project, the effectiveness of mitigation strategies, enhancement measures and more.

A **low level** of confidence is defined as a Project- Indigenous Peoples' values interaction that is poorly understood. Little to no data or research has been conducted on the subject matter. There are no or few established industry wide or best management practices associated with the potential effects. The assessment has a high degree of uncertainty in the outcome and level of effect.

A **moderate level** of confidence is defined as the Project- Indigenous Peoples' values interaction is partially understood. A moderate level of uncertainty exists due to gaps in data or research exist. The assessment is conducted with conservative methods and there is a moderate level of uncertainty in the outcome and level of effect.

A **high level** of confidence is defined as a fully understood Project- Indigenous Peoples' values interaction. Data and research on the subject matter are robust and well-tested. The effect is mitigated with well-established industry wide or best management practice. The assessment has a high level of certainty in the outcome and level of effect.

### 1.4.1 Current and Historical use of Lands and Resources for Traditional Purposes, and Cultural Continuity

The level of confidence assigned to the assessment reflects the availability and quality of information provided, the level of understanding of Project and Indigenous values interactions, and the degree of uncertainty associated with predicted effects. Confidence ratings recognize where data are strong and where knowledge gaps may influence the reliability of the assessment outcomes. A conservative approach was used in assessing potential net effects where there was uncertainty with information. Although there are some uncertainties in the assessment, they have been minimized or reduced by making some conservative assumptions. A number of key information gaps existed with respect to current and historical use of lands and resources for traditional purposes and cultural continuity included:

- Limited community-verified baseline data was provided by communities related to current land use patterns, harvesting practices, preferred areas, and seasonal rounds. While some qualitative and map-based information was available, gaps remained in spatial detail and in documenting recent changes in land use that may influence how Project interactions are experienced.
- Inconsistencies in participation and data provided across communities in the LSA and RSA. Despite extensive opportunities, engagement levels varied over time which affected the ability to capture additional perspectives, harvesting practices, or cultural uses of the land across all affected groups.
- Limited documentation of culturally grounded indicators for assessing changes to cultural continuity. Many aspects of cultural transmission, identity, and intergenerational knowledge sharing are not well captured in Western scientific frameworks. The lack of quantitative indicators for these values contributed to uncertainty in predicting how Project-related effects may manifest.

- Uncertainty regarding future land-use patterns and regional development pressures. The Project may influence, or be influenced by, other foreseeable developments in the region. As the timing, scale, and nature of these other developments are not yet fully established, it is difficult to determine how cumulative changes will affect long-term access, traditional land and resource use, or cultural practices.
- Knowledge gaps related to wildlife distribution and harvest pressure, including how species important for traditional harvesting may respond to new roads, sensory disturbance, or increased non-Indigenous access. Insufficient region-specific data contributes to uncertainty in predicting downstream effects on harvesting rights and cultural practices.
- Uncertainty about behavioural responses of land users, both Indigenous and non-Indigenous people to new access routes. Predicting how patterns of travel, harvesting, and land occupancy may shift once road access is introduced remains challenging.
- Variability in individual and family-level harvesting practices, which means that changes in land access, sensory disturbance, or wildlife abundance could affect community members differently.
- Incomplete understanding of the long-term implications for cultural continuity, including potential changes to language use, land-based education, youth engagement with the land, and transmission of traditional knowledge. These effects often unfold over generations and cannot be predicted with high precision at the preliminary stage.
- The duration of the Project's operations phase introduces uncertainty, as long-term changes within the LSA and RSA are difficult to predict and may influence the effectiveness of mitigation strategies over time.
- Other future projects could have effects on the LSA and RSA and the evaluated Indigenous Values.

#### **Webequie First Nation – Moderate Level of Confidence**

The confidence in the net effects assessment of the current and historical use of lands and resources for traditional purposes and cultural continuity Indigenous Values as it relates to Webequie First Nation is **moderate**. The Project and Indigenous values interaction in this context is supported by a Project-specific Webequie First Nation IKLRU study and a rights impact assessment study, produced independently through a community led process. Although some data gaps exist, the assessment applies conservative methods to account for uncertainties. As a result, there is a low degree of uncertainty in the predicted outcomes and level of effect.

#### **Other LSA and RSA Communities – Low Level of Confidence**

The confidence in the net effects assessment of the current and historical use of lands and resources for traditional purposes and cultural continuity Indigenous Values as it relates to other LSA and RSA communities is **low** due to limited information provided by the communities. The Project and Indigenous values interaction in the LSA and RSA as it relates to current and historical use of lands and resources for traditional purposes and cultural continuity relies on IKLRU studies from some communities, as well as Project related communications received from Indigenous communities. Data gaps and limited information introduce uncertainty in the predicted outcomes and magnitude of effects for the other LSA and RSA communities.

## **1.5 Predicted Future Condition if the Project Does Not Proceed**

If the Project does not proceed, the future conditions of current and historical use of lands and resources for traditional purposes and cultural continuity Indigenous Values are likely to be unchanged from the existing conditions.

The Project is located in an area that is currently part of the Ring of Fire development in Northern Ontario. Although no projects are currently operational, it is expected that this area will be developed as the government of Ontario (as well as many First Nations) has identified the area as a key priority for future economic development in Ontario. The roads are also a priority for First Nations in the area, as they connect First Nations communities to the rest of the province more easily.

If this specific project does not proceed, the future condition of Indigenous values in the area is likely to be relatively unchanged.

## 1.6 Follow-Up and Monitoring Program

Follow-up and monitoring related to current and historical use of lands and resources for traditional purposes use and cultural continuity will be initiated at each phase of the Project. These activities will inform a precautionary approach and contribute to the understanding of changing existing conditions of Indigenous values and effects. This includes the Project related and cumulative effects and the effectiveness of mitigation measures in addition to effects that were not initially identified or expected.

The follow-up and monitoring of Project effects will be the responsibility of the Project proponent and will need to be conducted consistently throughout each stage of the Project. This will include engagement with community members and those in surrounding areas to address community concerns.

The monitoring and follow-up for the current and historical use of lands and resources for traditional purposes use and cultural continuity values will require constant and consistent monitoring to evaluate the effectiveness of the Project mitigation measures. Regular evaluation will allow the Project proponent to identify areas of concern or success in a timely manner and pivot mitigation measures if necessary. See Appendix N for more information.

The Community Readiness Plan (CRP) recognizes that the land is not only a physical space, but also a foundation for cultural teachings, harvesting activities, intergenerational learning, and the exercise of Aboriginal and Treaty Rights. Improved access to the land may support cultural activities, harvesting opportunities and community travel. At the same time, changes to the landscape and increased activity in the region could disrupt traditional practices if not carefully managed. This plan emphasizes the importance of working closely with land users, Elders, and knowledge holders to understand how the Project may interact with areas of cultural significance and ongoing land use.

A focus on monitoring and follow-up will support the early identification of Project-related changes and allow them to be addressed in a timely way.

Continuous dialogue with community members will guide the evaluation of whether mitigation measures are effective and whether cultural values and land-based practices continue to be supported as the Project advances. This includes recognizing cumulative effects and responding as conditions evolve on the land.

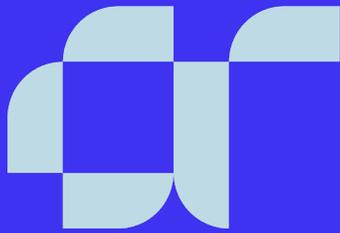
By embedding traditional knowledge, community priorities, and cultural stewardship principles into planning and implementation, the CRP supports cultural continuity. Maintaining these connections reinforces community resilience, protects the integrity of traditional land use, and allows future generations to continue to benefit from and care for the land in accordance with long-standing responsibilities. This approach aligns with the community's vision of balancing cultural preservation with sustainable development and helps traditional ways of life remain strong throughout construction, operations, and future activities in the region.

## 1.7 References

- CBC News. (2023a). Original Voices: OJI-CREE-CBC. Available: <https://www.cbc.ca/newsinteractives/original-voices/oji-cree>
- CBC News. (2023b). Northwest winter road season 'successful' despite climate challenges, some First Nations say. Available: <https://www.cbc.ca/news/canada/thunderbay/northwestern-ontario-winter-road-recap-1.6804386>
- Dyer, S.J., O'Neill, J.P., Wasel, S.M., and Boutin, S. (2002). Quantifying barrier effects of roads and seismic lines on movements of female woodland caribou in northeastern Alberta. *Canadian Journal of Zoology* 80: 839-845.
- Environmental Assessment Report/Impact Statement for the Webequie Supply Road. Available: <https://www.supplyroad.ca/finalea/>
- Firelight Research Inc and Fort Albany First Nation. (2024). Fort Albany First Nation Knowledge and Use Study for the Proposed Webequie Supply Road. Internal Document Review
- Fryxell, J.M., Avgar, T., Liu, B., Baker, J.A., Rodgers, A.R., Shuter, J., Thompson, I.D., Reid, D.E.B., Kittle, A.M., Mosser, A., Newmaster, S.G., Nudds, T.D., Street, G.M., Brown, G.S., and Patterson, B. (2020). Anthropogenic disturbance and population viability of woodland caribou in Ontario. *The Journal of Wildlife Management* 84(4): 636-650.
- InterGroup Consultants. (2025). Draft GBA+ Webequie Supply Road. Internal Document Review
- James, A.R.C., and A.K. Stuart-Smith. 2000. Distribution of wolves in relation to linear corridors. *J. Wildl. Manage.* 64: 154-159.
- Law, S. (2025). *New research explores impact of Ring of Fire mining on First Nations in northern Ontario*. CBC News. Available: <https://www.cbc.ca/news/canada/thunder-bay/ring-of-fire-research-project-1.7428459>
- Leblond, M., Dussault, C., and Oullet, J.P. (2013). Avoidance of roads by large herbivores and its relation to disturbance intensity. *Journal of Zoology*, 289: 32-40.
- Mining Industry Human Resources Council. (2023). *Integrating EDI: Addressing systemic employment barriers in Canadian mining*. Available: <https://mihr.ca/wp-content/uploads/2023/11/MIHR-23-Integrating-EDI-web-EN-Nov.pdf>
- MNP LLP. N.D. Kashechewan First Nation Existing Conditions Report, Webequie Supply Road Project. Internal Document Review.
- MNP LLP. N.D. Weenusk First Nation Existing Conditions Report. Internal Document Review.
- National Inquiry into Missing and Murdered Indigenous Women and Girls (Canada) (MMIWG). (2019). *Reclaiming power and place: The final report of the national inquiry into missing and murdered indigenous women and girls*. Available: <https://www.mmiwg-ffada.ca/finalreport/>
- Stantec Inc. 2024. Webequie First Nation Indigenous Knowledge Study for the Webequie Supply Road. Interim Report. Prepared by Stantec Consulting Ltd. October 4, 2024. Internal Document Review
- Suslop Inc. (2024). Marten Falls First Nation Indigenous Knowledge, Land Use and Occupancy Study for the Northern Access Roads. Proposed Webequie Supply Road Project. Internal Document Review
- Truth and Reconciliation Commission of Canada. (2015). *Honouring the truth, reconciling for the future: Summary of the final report of the Truth and Reconciliation Commission of Canada*. Truth and Reconciliation Commission of Canada. Available: <https://publications.gc.ca/site/eng/9.807830/publication.html>

Zhang, Merrina, Alireza Roghani and Sylvie Chenier. (2024). Winter Road Climate Risk & Vulnerability 2020-2024 Research Summary. National Research Council Canada. Available:  
<https://nrcpublications.canada.ca/eng/view/object/?id=811fed70-eb56-4f3b-b795-201695feb6ae>

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