

WEBEQUIE SUPPLY ROAD FINAL ENVIRONMENTAL ASSESSMENT REPORT / IMPACT STATEMENT

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SECTION 27:

Conclusions

Revision 1



WEBEQUIE FIRST NATION

AtkinsRéalis



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27 Conclusions

This section provides an overview of the conclusions of the coordinated Ontario Environmental Assessment and Canada Impact Assessment (EA/IA) for the proposed Webequie Supply Road Project (the Project, WSR), including the advantages and disadvantages of proceeding with the Project.

27.1 Overview of the Process

Webequie First Nation is completing a Comprehensive EA under Ontario's *Environmental Assessment Act* (EA Act) and Impact Assessment (IA) under Canada's *Impact Assessment Act* (IA Act) for the proposed Project. The proposed Project is a new all-season road of approximately 107 kilometres in length, connecting Webequie First Nation and its airport to existing mineral exploration activities and proposed future mining development in the Ring of Fire area near McFaulds Lake.

This Environmental Assessment Report / Impact Statement (EAR/IS) has been prepared to fulfil the requirements of the Canadian IA Act and the Ontario EA Act. The EAR/IS is being submitted by Webequie First Nation, as the proponent, to the Impact Assessment Agency of Canada (IAAC or the Agency) pursuant to requirements of the federal IA Act and Tailored Impact Statement Guidelines (TISG) for the Project, dated February 24, 2020. In addition, as required under Section 17.7 (1) of the EA Act and the Terms of Reference approved with amendments on October 8, 2021, Webequie First Nation is also submitting the EAR/IS to the Ministry of the Environment, Conservation and Parks (MECP) for review and decision.

The EA/IA for the Project has assessed the effects of the WSR on 14 valued components, the rights and interests of First Nations and 4 other factors as specified in the IA Act, TISG, and approved EA Terms of Reference. The scope of the assessment also considered the concerns and issues raised during Webequie First Nation's engagement and consultation with Indigenous communities and groups, the public, government agencies, and stakeholders, throughout the EA/IA process. The 22 Indigenous communities that have been consulted as part the EA/IA for the WSR are identified in Section 2 – Engagement and Consultation Summary, including details of the activities undertaken and feedback received from communities.

As described in Section 3 (Project Alternatives), an evaluation of alternative routes and alternative locations for supportive infrastructure, such as construction camps, pits and quarries and access road, was completed to select a preferred Project footprint or development area. This evaluation was based on Indigenous culture, values, and land use; natural environment; socio-economic environment; and technical and cost considerations. Based on this analysis, the preferred route for WSR and the locations for supportive infrastructure identified and described in Section 4 have more advantages and fewer disadvantages, and consequently is the preferred Project Footprint (development area) for which Webequie First Nation seeks approval. The preferred Project footprint that was selected for the Project includes the following main components:

- Permanent two-lane all-season road with roadside ditches that is approximately 11-12 m wide within a typical 35 m Right-of-Way;
- Maintenance areas along the WSR to allow for equipment/vehicles during the operations phase of the Project to safely turn around;



- Rest areas along the WSR to enhance safe travel and provide more comfort for road users during the operations phase of the Project;
- Construction, operations and maintenance of 31 waterbody crossings, which include 6 bridges and 25 culverts;
- Development of temporary supportive infrastructure associated with construction, including:
 - Two aggregate/rock source areas (pits/quarries);
 - Temporary access roads; and
 - Construction camps with laydown, and storage areas, including power supply and communication system.
- Permanent Maintenance and Storage Facility, aggregate pit/quarry with access road, power supply and communications, and storage areas for fuels, explosives, equipment, aggregate and wastes to support operations and maintenance of the Project.

The design of the Project was directly influenced by the values of Webequie First Nation and the objective to minimize adverse effects on the local environment and maximize socio-economic benefits. The design of the Project also considered the views and feedback received from other Indigenous communities, government agencies and stakeholders. Design approaches incorporated into the Project to reduce potential environmental effects include:

- The preferred route for the WSR has been selected with consideration to minimize the number of waterbody crossings for the road, avoid areas of known Indigenous traditional use or interest (e.g., hunting and plant harvesting areas, spiritual/cultural sites), as well as the Project Footprint has been minimized to the extent possible to limit effects to vegetation, wetlands and wildlife habitat.
- Culverts and bridges are designed to match or exceed expected flow rates in waterbodies or watercourses to provide capacity for expected water levels and water volumes. This includes consideration of site-specific discharge rates at crossing to inform on the appropriate sizing of the water crossing structures and consideration of climate change.
- Bridge designs have been adopted for larger watercourse crossings which is expected to reduce harm to fish habitat and allow for the safe navigation of boats by spanning over the waterbody and minimizing the placement of structures in-water.
- Culverts have been designed to replicate existing functions at watercourses, including the minimum and maximum water levels in culverts for fish passage, erosion control and the proper hydraulic conveyance.
- To maintain existing surface drainage flow paths, groundwater movement and prevent barrier effects of the road in the peatlands, the road design includes equalization culverts that will be placed at regular intervals along the road to maintain local hydrology and mitigate adverse changes to vegetation.
- The design has considered appropriate roadside safety treatments and design elements as specified in the Ministry of Transportation Roadside Design Manual (May 2020) with focus on such aspects as the horizontal alignment at road curves; vertical alignment at road dips; slopes at roadside ditches; barriers systems (e.g., guiderail); and sight distance along the road to provide drivers with sufficient time to identify and react to all elements of the road environment (e.g., collisions with wildlife). In addition, maintenance turnaround areas have been designed to allow for maintenance equipment/vehicles during the operations phase of the Project to safely turn around and proceed in the opposite direction in which they came on the roadway. As well, the design includes “rest areas” along the road to enhance safe travel and provide more comfort for road users who may want to pull-off to allow for other vehicles to pass, or to stop due to inclement weather, vehicles issues or to rest.



27.2 Existing Conditions and Effects Assessment

Natural environment, social, economic and health studies were completed by technical disciplines to document the existing conditions and assess the effects of the Project. A total of 17 technical disciplines under the 14 valued components were considered in the EAR/IS. Considering the input received from engagement and consultation, each technical discipline used existing conditions information and description of anticipated construction and operation activities to determine the potential interactions between the WSR and the environment. After the potential interactions were determined, potential effects were identified, and strategies and measures to avoid or mitigate the adverse effects were identified and examined by the Project Team. Mitigation are methods or approaches to eliminate, reduce, control or offset the potential adverse effects of the Project on the environment. The effects assessment also looked at strategies and measures to enhance the positive benefits of the Project, such as those related to social, economic and health conditions. Predicted positive net effects from the Project include:

- Increased employment opportunities offered will create an environment for off-reserve members to return to their communities, particularly for Webequie First Nation, which may see an increase population (in-migration).
- Increased education, training and traditional learning opportunities, leading to potential higher levels of education and training attainment.
- Increased employment and income, as well as overall economy and business opportunities.
- Potential improvement to food security from additional income to afford non-traditional food (store bought).

Through the appropriate use of mitigation measures (refer to Appendix E, Appendix N and those identified in Sections 6 through 21), the potential effects, including cumulative effects, from the construction and operations of the WSR are predicted be effectively managed, minimized, or mitigated. With implementation of mitigation and management measures, the overall net effects of the Project with consideration of the positive socio-economic benefits from the Project are not anticipated to result in significant adverse effects. However, there are some potential effects where the risk of occurrence may have significant consequences based on the unique challenges and vulnerabilities faced by Indigenous communities that are more susceptible to certain negative social effects due to historical and systemic inequalities. These effects can stem from factors like colonialism, discrimination and disparities in access to health care services. Potential social and health effects of this nature for the Project include community well-being and safety, particularly the safety and security of woman and girls, and substance use. Therefore, enhanced mitigation and monitoring are proposed for these potential effects to manage and prevent significant adverse effects. In addition, the assessment concluded there are predicted significant net effects to Species at Risk, and specifically changes to predator-prey dynamic for Caribou that may result in injury or death, and habitat loss for Wolverine.

27.3 Advantages and Disadvantages

In accordance with the Ontario Ministry of the Environment, Conservation and Parks' Code of Practice: Preparing and Reviewing Environmental Assessments in Ontario (MECP, 2014), an EA should describe the process for evaluating alternatives and then choosing a preferred alternative, which will become the undertaking for which approval is sought. The evaluation of "alternatives to" the Project and "alternatives



means” to carrying out the Project is also required under the Canada IA Act by the IAAC. The evaluation is a trade-off process in which the advantages and disadvantages to the environment of the alternative courses of action are weighed in terms of their effects, both positive and negative, on the environment.

In the case of this Project, the approved Terms of Reference indicates that the EA will not include an assessment of “alternatives to” except for the “do nothing” alternative. The rationale for proceeding in this manner was that the Terms of Reference documented the evaluation of “alternatives to” the Project which led to the identification and justification for the Project or preferred “Alternative to” the undertaking. To fulfil the requirements of the TISG and federal IA process, this evaluation of “alternatives to” is presented in Section 3 of this EAR/IS. In accordance with the EA Act and IA Act, the EA/IA includes an assessment and evaluation of the advantages and disadvantages of proceeding with the undertaking (the Project) against the “do nothing” or null alternative.

Proceeding with the Project is predicted to produce net effects to the environment, health, social and economic conditions. Based on the Project Description (Section 4) prepared at the time of submission of this EAR/IS, the existing environment and considering the implementation of the mitigation and enhancement measures described in Sections 6 to 20, Appendix E, and Appendix N, the net adverse effects associated with the Project can be effectively mitigated and managed. The Project is expected to provide the following net benefits:

- Increase in labour demand from direct employment, indirect employment, and induced employment during construction and operations of the Project.
- Contracting opportunities for Indigenous and non-Indigenous businesses and spending by local and regional consumers and service-oriented businesses through wages and income from construction and operations of the Project that will support and promote economic development.
- Access to mineral exploration activities and proposed mining developments in the Ring of Fire area that would amplify the economic benefits noted above and by doing so result in improvements to the social and health conditions and overall well-being of Webequie First Nation and other Indigenous communities in the region.

The EA Act and IA Act do not differentiate between the importance of the different elements of the environment (being, natural, social, economic and health); however, the MECP Code of Practice acknowledges that the effects to one environment may be greater than the effects to another (MECP, 2014). In the case of the Project, there are disadvantages to the natural environment because of the construction of the Project, but the need for the Project and the social and economic benefits outweighs the advantages of not undertaking the Project.

The selection of the Project as the preferred alternative is supported by the identification of the Project as a priority project for Ontario and Webequie First Nation and also supports long-term provincial growth and multimodal transportation initiatives in the region. Key relevant provincial plans and government priority initiatives around regional infrastructure and mining include the following:

- Ontario’s Infrastructure Building Better Lives: Ontario’s Long-Term Infrastructure Plan 2017 (MOI, 2018);
- The 2041 Northern Ontario Multimodal Transportation Strategy (Draft) (MTO and MNM, 2017);
- The Growth Plan for Northern Ontario (MOI and MNM [now MNEDG], 2011);
- Ontario’s Mineral Development Strategy (MNM [now MEM], 2015); and
- Ontario’s Critical Mineral Strategy: 2022-2027 (NMF [now MEM], 2022).



The Project as the preferred alternative also supports the aspirations of Webequie First Nation as it best addresses the Project purpose and objectives (refer to Section 1), as stated by Webequie, including providing new and enhanced opportunities to improve Webequie’s economic and social well-being. It is also considered the most reasonable alternative given the current and projected available resources (people and financing) and is the likeliest alternative to be within Webequie’s abilities to implement.

Given the purpose of the Project to Webequie First Nation and the Project’s ability to support Ontario’s provincial growth, development and multimodal transportation initiatives, the relative advantages (e.g., to provide all-season road access to the Ring of Fire area) offset the relative disadvantages.

Table 27-1 summarizes the relative advantages and disadvantages of the Project compared to the “do nothing” alternative.

Table 27-1: Advantages and Disadvantages of Alternatives to the Project

Alternative	Advantages	Disadvantages
Proceed with the Project	<ul style="list-style-type: none"> ▪ Meets the stated Project purposes of Webequie First Nation to: <ul style="list-style-type: none"> ▫ Allow for the movement of materials, supplies and people from the Webequie First Nation’s Airport to mineral exploration and proposed future mine developments in the Ring of Fire near McFaulds Lake; ▫ Provide employment and other economic development opportunities to community members and businesses, while preserving their language and culture; and ▫ Provide experience/training opportunities for youth to help encourage pursuit of additional skills through post-secondary. ▪ Economic benefits in the form of employment, contracts, business opportunities, or procurement of goods and services. ▪ Supports economic growth in northwestern Ontario. ▪ Long-term economic and social enhancement opportunities to Webequie and other Indigenous communities. ▪ Consistent with provincial plans and government priority initiatives around regional infrastructure in the region. 	<ul style="list-style-type: none"> ▪ Potential effects on the environment including: landscape alteration; soil erosion and soil compaction; alteration and/or loss of fish habitat, vegetation, wildlife habitat including species at risk; and other effects such as, safety and security, increased dust, noise, and vehicle emissions. ▪ Potential effects on land resources, traditional activities, or other interests of Indigenous communities.
Do Nothing	<ul style="list-style-type: none"> ▪ No potential effect on the environment. ▪ No potential effects on land resources, traditional activities, or other interests of Indigenous communities. 	<ul style="list-style-type: none"> ▪ Does not meet the stated purposes and objectives of Webequie First Nation to improve socio-economic conditions, including employment, businesses and training opportunities. ▪ Loss of economic and employment opportunities and resulting potential improvements to social, human health and community well-being.



Alternative	Advantages	Disadvantages
		<ul style="list-style-type: none"> ▪ No economic benefits in the form of employment, contracts, business opportunities, or procurement of goods and services. ▪ No contribution to economic growth in northwestern Ontario. ▪ No long-term economic and social enhancement opportunities to Webequie and other Indigenous communities from access to the Ring of Fire area. ▪ Not consistent with provincial plans and government priority initiatives around regional infrastructure in the region.

27.4 Follow-up and Related Monitoring

Follow-up and compliance monitoring programs will be developed and implemented by the proponent as described in Section 22. Environmental monitoring refers to the procedures and activities that the proponent will implement as part of its environmental management systems, and specifically its Construction Environmental Management Plan and the Operation Environmental Management Plan, to manage the environmental aspects of the proposed Project. The purpose of follow-up and monitoring will be to assess the effectiveness of mitigation measures and predicted effects in the EAR/IS and to document compliance with commitments and obligations identified in the assessment and in any conditions associated with positive decisions under the EA Act and IA Act and other permits, approvals and authorizations.

Monitoring activities are designed to:

- Verify environmental effects predictions made during the engineering design and environmental assessment of the Project;
- Provide data with which to evaluate the effectiveness of mitigation measures undertaken;
- Provide data with which to implement adaptive management measures for improving future environmental protection activities;
- Document additional measures of adaptive measures to improve future environmental protection activities; and
- Document compliance with required conditions as stipulated in regulator permits, approvals, authorizations and those in any positive Notice of Decision(s) under the EA Act or IA Act.

Follow-up and monitoring programs will include the participation of Indigenous monitors during the construction and operation phases of the Project to bring local knowledge to the protection of traditional and cultural sites of importance both for their historical value and because they tangibly connect past, present, and future cultural identity.



27.5 Procedure for Changes to Project

This procedure will be followed when the proponent wishes to make a change to the construction or operation of the Webequie Supply Road (Project) as detailed in the EAR/IS, following EA Act approval, should approval be given.

27.5.1 Minor Changes and Significant Changes

A “change to the Project” means a change to the Project as it is described in the Final EAR/IS or any Final EAR/IS Addenda, a change to any monitoring programs as set out in the Final EAR/IS, a change to any mitigation measures set out in the Final EAR/IS or any Final EAR/IS Addenda, and a change to any commitments documented in the Final EAR/IS.

A “significant change” means a change to the Project that would result in new net negative or increased net negative environmental effects beyond those assessed in the EAR/IS.

A “minor change” means any change to the Project that is not a significant change.

The proponent will assess the potential net negative environmental impacts of any proposed change to the Project prior to implementing the change. Based on that assessment, the proponent will determine whether a proposed change to the Project is a minor change or a significant change. The proponent will document the assessment and determination, which will include a description of the change, the rationale for the change, and a description of any new or increased net negative environmental effects.

The proponent will make this documentation available upon request by any person.

27.5.2 Procedure for Minor Changes

The proponent may implement a minor change after documenting the assessment and determination mentioned under Section 27.5.1, above.

On a monthly basis the proponent will prepare a description of any minor changes implemented in the previous month and will publish this information on the project website.

27.5.3 Procedure for Significant Change

(a) Preparation of Draft EAR/IS Addendum

For a significant change, the proponent will prepare a draft EAR/IS Addendum that includes the following:

- A description of the proposed change(s);
- Reason for the proposed change;
- A description of the assessment carried out under 2 above;
- Potential environmental impacts associated with the change(s), as well as any related changes to monitoring, mitigation measures or commitments for future construction and operation responding to the potential environmental impacts;
- Any known external approvals required.



(b) Consultation on Draft EAR/IS Addendum

The proponent will prepare a Notice of Draft EAR/IS Addendum. The Notice of Draft EAR/IS Addendum will include:

- Name of the project;
- A brief description of the proposed significant change;
- Geographical location of the project study area;
- Name of the proponent;
- Invitation to provide comments on the results of the draft EAR/IS Addendum (noting whether changes are of an urgent nature, as below);
- Start and end dates of the comment period;
- Contact information for individuals who can provide further information;
- How the draft EAR/IS Addendum can be accessed; and
- Information on where any additional materials can be accessed (e.g., website, physical location).

The proponent will distribute the Notice of Draft EAR/IS Addendum by:

(a) providing a copy of the notice to:

- (i) every Indigenous community that was consulted during the EA process for the project;
- (ii) the clerk of every municipality that was consulted during the EA process for the project; and
- (iii) any provincial ministry or federal department or other person who, in the opinion of the proponent, may be interested in the significant change; and

(b) publishing a copy of the notice on the project website.

The Notice of Draft EAR/IS Addendum will provide for a 30-day comment period, or other time period as directed by the Director of EAB.

The proponent will consider and address, as appropriate, any comments or concerns received from interested parties. Any changes made to the Draft EAR/IS Addendum as a result of concerns raised in respect of the change will be reflected in the Final EAR/IS Addendum.

The proponent will consolidate all comments received during the comment period, along with the proponent's responses, into an EAR/IS Addendum Record of Consultation. This document will also include a summary of notification and consultation activities and records of meetings and other communications between the proponent and commenters.

The proponent will provide the Final EAR/IS Addendum and EAR/IS Addendum Record of Consultation to the Director of EAB. The Final EAR/IS Addendum and EAR/IS Addendum Record of Consultation will also be posted to the project website.

(c) Implementing the Significant Change

Within 30 days of receiving the Final EAR/IS Addendum and EAR/IS Addendum Record of Consultation from the proponent, the Director of EAB may:



- initiate additional consultation with interested parties or persons, as the Director considers appropriate, after notifying the proponent of same; and
- require that the proponent undertake, and document, additional consultation efforts with interested parties or persons to resolve any outstanding issues.

If the Director of EAB has taken either action described above, the proponent will not implement the proposed significant change until such time as the Director of EAB has informed the proponent, in writing, whether or not it can proceed to implement the proposed significant change.

If the Director of EAB has not taken either action described above within 30 days of receiving the Final EAR/IS Addendum and EAR/IS Addendum Record of Consultation from the proponent, or where the Director has indicated in writing that the proponent may proceed the proponent may implement the significant change.

27.5.4 Urgent Changes

An urgent change is a change to the project that is required in order for the proponent to respond to an urgent situation, such as an imminent risk to health, safety or the environment. An urgent change can be a minor change or a significant change but is limited to what is required to prevent or respond to the urgent situation.

Where an urgent change is required:

- 1) The proponent will proceed with the urgent change.
- 2) The proponent will notify the following within 30 days of initiating the urgent change:
 - a. the Director of EAB;
 - b. Indigenous communities; and
 - c. any interested parties who, in the opinion of the proponent, may be interested in the urgent change.
- 3) The proponent will document any urgent changes and post summaries of the urgent change(s) and their rationale on the project website

27.5.5 Annual Compliance Reporting Regarding Changes

In any annual compliance reports that may be required in any Notice of Approval that may be issued under the EA Act, the proponent will include a summary of all changes to the Project.



27.6 Engagement and Consultation

Webequie First Nation has been engaging and consulting on the WSR with Indigenous communities and groups, the public, government agencies, and stakeholders since 2019.

Relationship building has been at the core of engagement and consultation efforts. Webequie First Nation will continue to work with Indigenous communities and stakeholders throughout the assessment process to resolve issues and address comments and feedback received from the review of the Final EAR/IS. This may include further engagement and consultation opportunities to clarify information on the Project, provide additional information, and discuss potential effects of the Project and proposed mitigation measures documented in the EAR/IS.

As the Project is proposed to be operated for an indeterminate period of time, it is Webequie First Nation's intention to engage Indigenous communities and stakeholders based on foundations of respect, trust, cooperation and open communication on a long-term basis with the intent of building mutually beneficial relationships and addressing the rights, values, traditions, concerns and aspirations of Indigenous communities.

27.7 References

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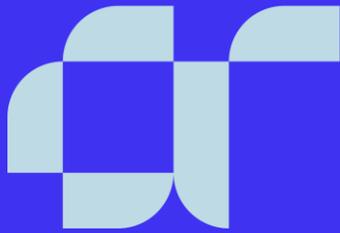
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