



December 8, 2025

Tracy Lachine
Project Manager, Prairie and Northern Region
Impact Assessment Agency/ Government of Canada

tracy.lachine@iaac-aeic.gc.ca

Dear Tracy Lachine,

**Re: Project 6 – All-Season Road - Request for Comments on the Draft
Environmental Assessment Report and Draft Potential Conditions**

Indigenous Services Canada (ISC) has reviewed the Draft Environmental Assessment Report (the Draft EA Report) and Draft Conditions for the Project 6 – All-Season Road Linking Manto Sipi Cree Nation, Bunibonibee Cree Nation, and God's Lake First Nation. Thank you for the opportunity to provide comments and for considering ISC's input into the assessment to date.

ISC agrees with the Impact Assessment Agency of Canada's (IAAC) conclusions pertaining to direct and cumulative significant adverse environmental effects on Indigenous peoples' current use of lands and resources for traditional purposes; physical and cultural heritage; sites or things of historical, archaeological, paleontological, or architectural significance; and health, social and economic conditions.

ISC notes that many Indigenous groups have identified concerns during the environmental assessment process that may not be directly related to the Project and cannot be directly addressed under the *Canadian Environmental Assessment Act, 2012*. ISC encourages the Proponent to consider undertaking additional consultation and relationship-building efforts with potentially affected Indigenous communities to explore options to address concerns where possible and to support mitigation, monitoring and follow-up measures recommended in the Final Report.

ISC has the following comments on the Draft EA Report:

- Section 7.6 Federal Lands: while the Draft EA Report indicates that the IAAC's conclusions are informed by the proponent's analysis and the views expressed by Indigenous groups and federal authorities, this section does not present views expressed. As the endpoints of the road are adjacent to reserve lands, ISC

- encourages IAAC to include the perspectives of the Manto Sipi Cree Nation, Bunibonibee Cree Nation, and God's Lake First Nation in the EA Report.
- Section 8.1 Accidents and Malfunctions: this section recommends that the proponent develop a plan, prior to construction, to notify Indigenous groups of any accidents or malfunctions that may occur within the Project Footprint in a timely manner. ISC recommends that the following be added to this mitigation measure and required of the proponent: These plans should include specifications for spills and releases near reserve lands, including procedures to advise and work with local First Nations' in response.
 - Section 8.3 Cumulative Effects: this section identifies that Manitoba Metis Federation, God's Lake First Nation, Manto Sipi Cree Nation, Pimicikamak Okimawin, and Bunibonibee Cree Nation expressed concerns regarding the limited scope of past, present, and reasonably foreseeable projects and physical activities considered in the proponent's cumulative effects assessment. ISC shares in this concern. Notably, Project 2 and Project 5 are not presented as reasonably foreseeable projects; however, ISC understands these are part of a larger committed vision for a road-accessible Manitoba. ISC encourages the proponent to work with communities to address cumulative effects related to road connectivity as projects progress.
 - Appendix B:
 - o Item K1: communities have expressed concerns regarding whether the anticipated positive socio-economic benefits of the project will be realized, including those related to the cost of living and inter-community travel. ISC notes the proponent's data focuses narrowly on positive effects. In its continued engagement with the affected First Nations, ISC encourages the proponent to consider and address possible negative effects to affordability related to fuel costs, fuel scarcity, and fuel storage capacity.
 - o Item K3: communities have raised the importance of ensuring cultural sensitivity and Indigenous awareness training is provided to all non-Indigenous employees. Concerns were noted regarding potential conflict between project non-Indigenous employees and Indigenous community members. ISC notes that the proponent's approach is generally in alignment with the suggestions received. We would like to emphasize the importance of locally based and locally relevant training, directed by impacted First Nations. This mitigation should be added to Section 5: Health and Socio-Economic Conditions of Indigenous Peoples and required of the proponent.
 - o Item K6: the proponent's suggested checkpoint and patrol approach partially addresses the risks from contraband trafficking, violence and communicable disease increases; however, this approach does not acknowledge that contraband/communicable diseases may still enter the community, leading to health consequences for community members and potentially increasing the need for additional health services and supports, including staffing at the nursing station(s) and enhanced health programming. ISC recommends adding both the checkpoint/patrol and collaboration with the First Nation communities to assess and implement

related community-led health and social initiatives to Section 5: Health and Socio-Economic Conditions of Indigenous Peoples and that these mitigation measures be required of the proponent..

Thank you for the opportunity to review these documents. If you have any questions or concerns, please contact Julia Gregory, Environmental Management Specialist, at julia.gregory@sac-isc.gc.ca.

Yours sincerely,

Laura Mitchell,
Director General,
Lands and Environmental Management Branch,
Lands and Economic Development Sector,
Indigenous Services Canada
laura.mitchell@sac-isc.gc.ca