



October 14, 2024

Impact Assessment Agency of Canada
160 Elgin Street, 22nd floor
Ottawa, Ontario
K1A 0H3

Via email: regionalrof-cdfregionale@iaac-aeic.gc.ca

RE: Comments on the Draft Terms of Reference Regional Assessment in the Ring of Fire Area (reference # 80468)

To Whom It May Concern,

Wildlands League, a leading conservation group in Canada, with a long-standing interest in land use and environmental planning in this part of the province as well as extensive experience in monitoring the impacts of the proposed Ring of Fire mine development since the early 2000s appreciates the opportunity to comment on the Draft Terms of Reference for the Regional Assessment in the Ring of Fire Area. The Ring of Fire area is also known as Kawana 'bi 'kag by Matawa First Nations.

We commend the Agency for its commitment and its work to date to co-develop a regional assessment in partnership with Matawa and Mushkegouk First Nations in a cooperative, respectful, efficient manner. The draft Terms of Reference represents a significant improvement over the Draft Agreement in 2021 signed between Canada and Ontario. We welcome these Terms of Reference and hope the work continues. Below, we offer several observations and recommendations to strengthen the work going forward.

1. Where the Regional Assessment Will Take Place

That the broadened 'assessment area' encompasses much more of the watersheds, wetlands and surrounding habitat of the proposed 'development area' is welcome. The proposed flexibility (7.2) to ensure that the spatial and temporal boundaries in the assessment can be shifted is noted and warranted especially for boreal caribou and southern Hudson Bay caribou.

Downstream and down muskeg impacts within watersheds and wetlands must be a priority - on the lands and waters and people who live there. It will also be important to understand in advance how regional developments will cumulatively impact levels of mercury and methylmercury in the receiving waters and fish (and beyond) so that thresholds can be set. We also strongly recommend the assessment includes a review with First Nation partners to determine the contaminants beyond mercury and ensure this work is made public.

Given that there is no decision-making function of the regional assessment and that the regional assessment's aim¹ is to, "help inform and improve future impact assessments and associated

¹ See letter from Minister Guilbeault to Indigenous leaders February 2023.

decision-making”, we strongly recommend the development area include the proposed road link corridor. Right now, the development area is too narrowly focused on mining claims selected in May 2024. As we have seen over the last number of years, mining claim #s can shift considerably.

Wildlands League alerted the public to an increase in claims in December 2023 see <https://wildlandsleague.org/news/mining-claims-in-the-ring-of-fire-jump-by-30-since-2022/> and <https://globalnews.ca/news/10142331/mining-claims-ontario-ring-of-fire/>.

We note that colleagues at Wildlife Conservation Society also describe concerns with the description and lack of purpose of the development area in the draft Terms of Reference. WCS Canada’s up to date mapping of mining claims (October 2024) included in its submission to the Impact Assessment Agency highlights the arbitrary nature of drawing a box around claims in May 2024 and how many claims are left out. A more thoughtful approach is needed here that includes all future developments not just those anticipated in the ‘development area’ as described. Adding proposed roads can be done without expanding the development area to include all of northern Ontario and without duplicating the ongoing project level assessments of the road projects.

The proposed impacts of transporting ore to processing facilities and the building of said processing facilities would also need to be included as part of an analysis related to Ring of Fire development to inform decision-making. We are not suggesting the assessment area include all of Northern Ontario but we are recommending this not be excluded from discussions and analyses. Various companies are using the prospects of processing plants to help justify mining in the Ring of Fire. Local residents in these potential processing locations will have to shoulder the burden of these facilities in addition to any potential positive impacts. We recommend using the flexibility outlined in 7.2 to ensure a comprehensive discussion can take place and one that isn’t artificially cut off intentionally or unintentionally by arbitrary lines.

2. Carbon and ‘climate lens’ need to be explicitly added to purpose and objectives

The Hudson Bay Lowland, referred to as O mushkego Aski by Mushkegwouk First Nations, contains globally significant, ‘irrecoverable’ carbon stores (soil carbon that if disturbed would take centuries to recover). These ancient peatlands have been cooling the planet for millennia and if disturbed would deepen the gulf to meeting climate targets and make our climate problem worse. Scientists at Wildlife Conservation Society Canada have updated the carbon stock numbers in peatlands within the Ring of Fire area (with the increased mining claims). Approximately 560 million tonnes of carbon are stored which is equivalent to just over 2 billion tonnes of CO₂. These [carbon stores](#) are irrecoverable. Keeping them undisturbed is critical to meeting global climate goals. Once lost, they cannot be recovered by 2050. If only 3% of the Ring of Fire is developed, this would result in about 62 million tonnes of CO₂ equivalent, just under all of the emissions reductions Canada did from 2005-2021. See <https://wildlandsleague.org/background-info/> for more information.

The cumulative impacts from all activities including mine development activities, roads, infrastructure, induced developments and current and future mineral exploration on carbon and within a climate changing planet must be made clear in the Terms of Reference.

3. Greater Scrutiny Needed of Economic Ring of Fire Claims & Independent Analysis and Verification to support a Successful Regional Assessment

Section 4.1 of the draft Terms of Reference treats the mineral resources and mining potential of the Ring of Fire as a “known”. Proponents of the Northern Road Link, officials in the Ontario government and others in the mining sector have described the Ring of Fire as the, ‘most promising mineral development opportunity in the province in over a century’. See Project Need (section 8, p. 34) of The Northern Road Link Project Description²:

The Ring of Fire in the Ontario Far North is considered one of the most promising mineral development opportunities in the province in over a century, with potential for multi-generational chromite production and significant production of nickel, copper and platinum (MINES, 2022).

The reference or source of this information? an Ontario government promotional webpage³.

Governments and mine proponents regularly and irresponsibly rely on outlandish figures about the economic potential of the Ring of Fire. With some digging, the Globe and Mail uncovered the flimsiness of Ring of Fire economic claims⁴ in 2019. This was followed up by Global News⁵ in 2023 that easily disproved claims by an Ontario minister who said the Ring of Fire was worth at trillion dollars. Even Wyloo has admitted its feasibility study for Eagle’s Nest won’t be ready till 2025 and the only technical report (NI 43-101) Wildlands League is aware of is for the project is from Noront in 2012.

We strongly recommend the Agency and partnering First Nations independently verify the economic claims regarding the Ring of Fire and invite expert, independent analysis and review with data and facts to inform discussions.

An independent review of the successes and failures of the now decommissioned DeBeers Victor Diamond Mine with the intention of informing the regional assessment is also warranted. We stand by this recommendation from previous submissions. Our experience⁶ with the Victor Diamond Mine shows that Ontario’s reliance on self-reporting by mining companies does not work. Too often, this gives mining companies the opportunity to pollute with impunity.

Moreover, we recommend an independent review of existing critical mineral projects in northern Ontario. An early review conducted by Wildlands League found over a dozen nickel projects closer to existing infrastructure in Ontario, with greater community support and faster

² See Project Description here <https://iaac-aeic.gc.ca/050/evaluations/proj/84331>

³ See <https://www.ontario.ca/page/ontarios-ring-fire>

⁴ <https://www.theglobeandmail.com/business/article-the-road-to-nowhere-why-everything-youve-heard-about-the-ring-of/>

⁵ <https://globalnews.ca/video/9527029/the-power-of-peat-canadas-secret-weapon-against-climate-change>

⁶ <https://wildlandsleague.org/news/de-beers-pleads-guilty-july-6-2021/>

timelines than the Ring of Fire with considerably lower risks to the environment and significantly less public subsidies required (to private mining companies). This is important context that would inform a regional assessment.

4. Transparency and Public Consultation

We welcome the commitments around public consultation, transparency and the commitments to continue to use the registry (8.6 and 8.7) to share information, submissions etc. as part of the regional assessment and partnership with First Nations. We strongly recommend the Agency maintain this commitment and continue to act transparently as it will be an important tool to build confidence in the process and outcomes. We also strongly support the commitments by the Ministers and Chiefs to make reports public and hope these commitments continue.

We are interested in a conversation with the Agency on how to assist in building more meaningful engagements and dialogues with the public in a variety of ways. Wildlands League is willing and interested in contributing our expertise in a technical advisory group if the opportunity arose.

Thank you taking the time to seek the public's feedback and for keeping us apprised (as interested conservation group with a long-standing interest in the region) of progress in the regional assessment. We request the opportunity to provide additional feedback after the deadline and look forward to opportunities for workshops and/or deeper engagement both with the Agency and partnering First Nations on this important file. Thank you.

Sincerely,



Anna Baggio
Conservation Director