

Feedback Form

Toronto Third Line – July 20, 2026

Feedback Provided by:

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To promote transparency, feedback submitted will be posted on the [Toronto Third Line](#) engagement page unless otherwise requested by the sender.

- ☐ **Yes – there is confidential information, do not post**
☒ **No – comfortable to publish to the IESO web page**

The Independent Electricity System Operator (IESO) is seeking feedback from Indigenous communities and stakeholders on the “Proposed Procurement Design Features to Support Meaningful Indigenous Engagement and Participation” document. The document can be accessed from the [Toronto Third Line engagement webpage](#).

Note: The IESO will accept additional materials where it may be required to support your rationale provided below. When sending additional materials please indicate if they are confidential.

Please submit feedback to engagement@ieso.ca.

Please respond only to the questions that are relevant to your expertise, or interest. There is no expectation to answer every question.

Proponent Experience Requirements

Question 1: Should Indigenous engagement and consultation experience be demonstrated at the organizational level, the individual/team-member level, or through a combination of both?

Hiawatha First Nation would support a **combination of both organizational and team-member experience requirements**.

Meaningful Indigenous engagement requires both institutional capacity and qualified individuals with trusted relationships and demonstrated experience working with Indigenous communities. Organizational experience demonstrates that a proponent has established corporate systems, governance structures, resources, and accountability mechanisms to support consultation commitments throughout a project's lifecycle. However, successful engagement is often relationship-based and led by specific individuals with lived experience, cultural competency, and established trust with communities.

Neither standard alone is sufficient. A corporation should not qualify solely based on hiring consultants with Indigenous engagement experience, nor should a corporation be deemed qualified solely because of past corporate experience if the team responsible for implementation lacks the necessary expertise.

The IESO should require proponents to demonstrate:

- Organizational experience delivering infrastructure projects involving Indigenous engagement and accommodation.
- Dedicated senior personnel with direct Indigenous relations experience.
- Decision-making authority vested in those responsible for Indigenous engagement.
- Continuity of engagement personnel throughout project development and implementation.

Question 2: What types of team-member level experience should be considered (e.g. on-the-ground; Indigenous advisors; other Indigenous consultation and engagement specialists)?

The IESO should recognize a broad range of relevant experience, including:

- Direct on-the-ground engagement and consultation experience with Indigenous communities in Ontario.
- Experience supporting rights-based consultation processes.
- Indigenous advisors and cultural knowledge holders.
- Indigenous relations professionals with demonstrated relationship-building experience.
- Community engagement specialists with experience facilitating respectful dialogue and conflict resolution.
- Environmental assessment practitioners with experience incorporating Indigenous Knowledge.
- Indigenous-owned consulting firms and advisors.

- Indigenous project managers, negotiators, and economic development specialists.

Priority should be given to individuals who have demonstrated success working directly with First Nations in Ontario and who understand the legal, historical, cultural, and Treaty contexts that shape Indigenous-Crown and Indigenous-industry relations.

Question 3: What evidence would best demonstrate a proponent's ability to meaningfully engage with Indigenous communities?

The strongest evidence is demonstrated outcomes rather than statements of intent.

Appropriate evidence may include:

- Documented examples of successful Indigenous partnerships.
- Completed impact benefit agreements, participation agreements, or other collaborative arrangements.
- Examples of project modifications resulting from Indigenous input.
- Records demonstrating long-term relationship maintenance beyond project approval stages.
- Evidence of Indigenous participation in project monitoring and stewardship.
- Indigenous workforce development and procurement achievements.
- Community feedback regarding engagement quality.
- Independent evaluations or audits of Indigenous engagement programs.

Letters of reference may be useful as supporting documentation but should not be the primary measure of success. The focus should be on demonstrated actions and outcomes rather than endorsements alone.

Question 4: Are there additional qualifications that should be considered?

Additional qualifications should include:

- Demonstrated understanding of Treaty rights and responsibilities.
- Experience working within the Williams Treaties and Treaty 20 areas where applicable.
- Experience incorporating Indigenous Knowledge into project planning.
- Cultural competency and anti-racism training requirements.
- Experience with Indigenous-led environmental monitoring programs.
- Capacity to support community participation through technical, legal, environmental, and economic resources.
- Experience negotiating mutually beneficial economic participation agreements.
- Demonstrated commitment to reconciliation principles and implementation.

Particular consideration should be given to experience working with communities whose territories include significant water bodies, given the proposed underwater nature of the Toronto Third Line project.

Indigenous Participant and Engagement Plan

Question 1: Are there any additional goals that you think the IESO should aim to achieve?

Additional goals should include:

Recognition of Indigenous Rights and Jurisdiction

The IEPP should recognize that Indigenous Peoples are rights holders and governments, not merely stakeholders.

Protection of Water and Cultural Heritage

The IEPP should explicitly support protection of:

- Waterways
- Fisheries
- Cultural landscapes
- Archaeological resources
- Sacred and ceremonial sites
- Traditional harvesting areas

Integration of Indigenous Knowledge

Proponents should be encouraged to incorporate Indigenous Knowledge into project planning, environmental assessment, construction, monitoring, and long-term operations.

Indigenous Stewardship

The IEPP should promote opportunities for Indigenous communities to participate in environmental monitoring, stewardship, and ongoing project oversight.

Long-Term Community Capacity Building

The objective should extend beyond short-term project benefits and contribute to sustainable economic and governance capacity within Indigenous communities.

Relationship-Based Reconciliation

The IEPP should support long-term relationships between proponents and Indigenous communities that continue beyond project construction.

Question 2: What approach would best promote higher levels of equity and/or non-equity commitments while differentiating proponents based on the commitments they propose?

A hybrid approach is recommended.

The IESO should establish:

Minimum Mandatory Thresholds

All proponents should be required to provide:

- Minimum equity participation opportunities.
- Minimum non-equity commitments.
- Capacity funding commitments.
- Procurement, employment, and training commitments.

Graduated Rated Criteria

Additional points should be awarded based on:

- Higher levels of equity opportunities.
- Greater Indigenous procurement commitments.
- Stronger workforce development programs.
- Support for Indigenous-owned businesses.
- Long-term revenue-sharing opportunities.
- Environmental stewardship participation.

Evaluation should consider both the quantity and credibility of commitments.

The focus should not simply reward the largest commitments but should evaluate the likelihood those commitments can realistically be delivered

Question 3: How should proponents demonstrate experience establishing equity or non-equity economic participation and benefit arrangements with Indigenous communities? Are letters of reference an effective form of evidence, or should alternative forms of documentation be considered?

A combination of evidence should be required.

Letters of reference can provide useful context but should not be relied upon as the sole measure.

Preferred evidence includes:

- Signed participation agreements.
- Equity partnership agreements.
- Joint venture agreements.
- Procurement results and spending reports.
- Indigenous employment and training statistics.
- Capacity funding records.
- Examples of Indigenous ownership participation.
- Community benefit agreements.
- Documentation showing commitments were fulfilled.
- Independent audits or verification reports where available.

The strongest evidence demonstrates that commitments resulted in measurable benefits and were successfully implemented.

The IESO should place greater value on completed outcomes than on proposed intentions.

Question 4: What other enforcement mechanisms should the IESO consider utilizing?

In addition to reporting and auditing, the IESO should consider:

Independent Verification

Require periodic third-party reviews of Indigenous engagement and economic participation commitments.

Public Accountability

Require annual public reporting on:

- Equity participation progress.
- Indigenous procurement spending.
- Employment and training outcomes.
- Capacity funding provided.
- Community engagement activities.

Indigenous Advisory Oversight

Establish an Indigenous advisory body or monitoring committee to review transmitter performance and implementation of IEPP commitments.

Holdbacks and Performance-Based Incentives

A portion of contract payments or cost recovery approvals could be linked to achievement of key Indigenous participation commitments.

Corrective Action Plans

Where commitments are not being met, transmitters should be required to develop corrective action plans in consultation with affected Indigenous communities.

Community Complaint Process

Establish a transparent process through which Indigenous communities can raise concerns regarding unmet commitments and seek timely resolution.

Monitoring Beyond Construction

Enforcement should continue throughout the operational life of the project, ensuring long-term commitments remain active after construction is complete.

General Comments / Feedback

Hiawatha First Nation supports procurement approaches that advance meaningful Indigenous participation, economic reconciliation, and respectful engagement. However, Indigenous participation frameworks should also recognize Indigenous rights, stewardship responsibilities, and community priorities that extend beyond

economic benefits alone. The most successful Toronto Third Line project will be one that is built upon long-term relationships, transparency, accountability, protection of lands and waters, and meaningful participation by affected Indigenous Nations throughout the life of the project. From a Michi Saagiig perspective, the Draft IEPP contains several positive elements, but it remains largely framed around procurement success and project delivery, rather than the recognition and implementation of Inherent Rights, Treaty Rights, jurisdiction, and free, prior, and informed consent.