

*****Intended for Informational Purposes Only*****

Court File No. CV-25-00751759-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

BETWEEN:

**ALDERVILLE FIRST NATION, APITUPI ANICINAPEK NATION, AROLAND FIRST
NATION, ATTAWAPISKAT FIRST NATION, FORT ALBANY FIRST NATION,
GINOOGAMING FIRST NATION, KITCHENUHMAYKOOSIB INNINUWUG,
ONEIDA NATION OF THE THAMES and WABAUSKANG FIRST NATION**

Applicants

- and -

**HIS MAJESTY THE KING IN RIGHT OF ONTARIO and THE ATTORNEY GENERAL
OF CANADA**

Respondents

AFFIDAVIT OF RAMON KATAQUAPIT

I, **RAMON KATAQUAPIT**, of the City of North Bay, in the District of Nipissing of the Province of Ontario, **MAKE OATH AND SAY:**

1. I am an Omushkego Cree youth born in 2001 from Attawapiskat First Nation, located in Treaty 9 territory in Northern Ontario. I am Eagle Clan and a section 35 rightsholder under the *Constitution Act, 1982*. My community is situated within the Attawapiskat River watershed of the Hudson-James Bay lowlands - lands and waters my family has depended on since time immemorial. As such, I have personal knowledge of the facts and matters deposed to in this

Intended for Informational Purposes Only

affidavit. Where I do not have personal knowledge, I have set out the basis of my information and belief, and in all cases do verily believe such information to be true.

BACKGROUND AND INTEREST IN THIS APPLICATION

2. I am a youth leader from Attawapiskat First Nation. I am the founder of Okiniwak Indigenous Youth Movement (“Okiniwak”). I also serve on the Nishnawbe Aski Nation’s (“NAN”) Oshkaatisak Council and the Chiefs of Ontario’s Youth Council. Through this work, I speak for and with Indigenous youth from across the North who are raising their voices to protect our lands, waters, and rights. In addition to being an Indigenous youth and grassroots organizer, I am an independent musician. I include land and water advocacy in my music because I want to protect what has healed me during difficult times in my life.

3. As a youth leader, community member and rights holder from Attawapiskat First Nation who relies on the health of the Hudson-James Bay lowlands for my family and I’s physical, mental and spiritual health, I stand to be directly impacted by Bill 5, the *Protect Ontario by Unleashing Our Economy Act, 2025* (“Bill 5”) and accordingly have a genuine interest in this application.

4. I am concerned that Bill 5 will harm my generation and those yet to come by fast-tracking development without proper consent or consideration for the ecosystems that sustain us, including in the lands and water where the Ring of Fire is proposed. Known as the “Breathing Lands”, the peatlands and waters of the North are sacred to us. In addition to storing vast amounts of carbon, helping to offset climate change, the peatlands also serve as the foundation for our way of life. Once disturbed, the peatlands cannot return to their natural state and our way of life will forever be changed.

Intended for Informational Purposes Only

5. I first heard about Bill 5 in late May, 2025. I was attending the NAN's Spring Chiefs Assembly as a NAN Oshkaatisak Council member on May 20-22, 2025 in Toronto, when I first learned about the all encompassing and detrimental nature of Bill 5 and understood that something was coming for the land.

6. The immediacy of my response to Bill 5, which included the urgent founding of Okiniwak with other youth (described more below), speaks to my level of interest in Bill 5 and my understanding of the significant impacts to our rights this bill gives rise to.

7. I was in the Ontario Legislative Assembly public gallery on June 4, 2025, alongside members of the NAN Executive Council, when Bill 5 was passed. I watched as our rights were dismissed and our leadership's voices, including that of Attawapiskat First Nation's Chief Sylvia Koostachin-Metawabin, were silenced. In that moment, I knew youth could not wait for others to act - we had to rise ourselves.

8. In June 2025, out of continued concern for the land, our rights, and our futures after the passing of Bill 5, I founded Okiniwak, a grassroots movement of Indigenous youth igniting change across Ontario, Canada and Turtle Island.

9. Okiniwak means 'the leading youth'. Our mission - and sacred duty - is to amplify Indigenous youth voices, advocate for true equity and environmental stewardship, and protect the land that has sustained our peoples since time immemorial. What I began as a response to Bill 5 has grown into a movement rooted in the prophecy of the Seventh Fire: that young people will light the path toward healing, balance, and protection of the land.

Intended for Informational Purposes Only

10. As a youth, I inherited both the pain and the responsibility of our ancestors. The prophecy of the Seventh Fire tells us that young people will rise to rekindle the sacred fires of our nations and lead others back to balance with the Earth. I founded Okiniwak as my way of honouring those teachings. Even though this work can feel heavy, I find hope in the strength of our youth. We are the Seventh Fire generation, carrying both the wounds and the light. When we rise together, we make it possible for future generations to breathe freely again.

11. My commitment to taking action against Bill 5 and providing a platform for youth to be heard is demonstrated by my frequent and ongoing engagements with other youth and leadership, to amplify our voice and concerns in a range of public forums. I have led or taken part in multiple peaceful rallies and youth gatherings in Toronto, Ottawa, North Bay, Timmins, and Moose Factory. This includes:

- a. On June 2, 2025, I was among the youth who spoke out against Bill 5 at Queen's Park in Toronto, emphasizing the importance of protecting our lands, honouring ancestral stewardship, and ensuring that any development occurs only with free, prior and informed consent, for the sake of future generations.
- b. On July 1, 2025, I led and participated in Okiniwak's rally at Queen's Park in Toronto, to raise awareness about the threats posed by Bill 5 and Bill C-5 and let the government know that we are still here, and we will not be legislated out of our rights. The rally featured presentations and speeches by Oshkaatisaak Council, Oneida Nation Youth Representatives, Mushkegowuk Youth Council, Queen's Park Youth Delegation, and Endaayaan Youth Council.

Intended for Informational Purposes Only

- c. On July 17, 2025, I held a rally with Okiniwak at Parliament Hill in Ottawa opposing Bill 5 and Bill C-5, with the aim of making our presence known, our voices heard, and our spirits felt. The rally featured presentations and speeches by youth representatives of Mushkegowuk Youth Council, Youth Rising Together, Choose Life, FJWSS Student Council, Attawapiskat First Nation, Moose Cree First Nation and Neskantaga First Nation.
- d. On August 8, 2025, I co-hosted a rally at Queen's Park with Okiniwak, Mahmo Inninuwuk Wiibuseego-stamok and Youth Rising Together, against Bill 5 and Bill C-5. Our organizations came together in unity, solidarity and celebration to welcome Mahmo Inninuwuk Wiibuseego-stamok, who journeyed on foot on a ceremonial walk from Timmins to Toronto to raise awareness about Bill 5. The rally was attended by multiple Indigenous youth leaders and First Nation leadership, including Attawapiskat First Nation Chief Sylvia Koostachin-Metawabin and Mushkegowuk Council leaders Grand Chief Leo Friday and Deputy Grand Chief Amon Wesley.
- e. On August 13, 2025, I co-hosted a Youth Workshop and Bill 5 Rally in Moose Factory with Okiniwak and Youth Rising Together, with support from Moose Cree First Nation and MoCreebec Eeyoud Council, to build community and provide a space for youth to speak up and be heard.
- f. On August 18, 2025, I organized a youth gathering against Bills 5 and C-5 in Mattagami First Nation with Okiniwak and Youth Rising Together with support from Mattagami First Nation Health, to ensure youth voices are heard and to unite in solidarity for a better future.

Intended for Informational Purposes Only

- g. On September 28, 2025, I hosted a Bill 5 and Bill C-5 rally in Kingston, Ontario to provide a forum for Indigenous youth and allies to gather and be heard.
12. My ongoing efforts and presence as a leading youth voice in opposing Bill 5 has been documented in various news articles and interviews. This includes:
- a. Alessia Passafuime, “First Nations youth say they’re ‘starting a movement against major projects bills’”, *Winnipeg Free Press* (June 21, 2025). A copy of this article is attached as **Exhibit ‘A’**.
 - b. Xavier Kataquapit, “First Nation youth protest national meeting regarding Bill C5”, *Timmins Daily Press* (July 18, 2025). A copy of this article is attached as **Exhibit ‘B’**.
 - c. Xavier Kataquapit, “Youth Rally Celebrates Walkers to Queen’s Park”, *Wawatay News* (August 9, 2025). A copy of this article is attached as **Exhibit ‘C’**.
 - d. Interview by Mushkegowuk Council (August 11, 2025) on YouTube, filmed in front of Queen’s Park in Toronto following the youth rally held on August 8, 2025.
 - e. Interview by Douglas Farquhar (September 26, 2025) on Queen’s University’s CFRC-FM radio station in Kingston for their ‘Aboriginal Voices’ segment regarding our efforts against Bill 5.
 - f. Interview by Sayyida Jaffer (September 26, 2025) for ‘Division Street,’ a Cogeco YourTV series in Kingston, regarding our efforts against Bill 5.

Intended for Informational Purposes Only

- g. Abdul Matin Sarfraz, “Ontario communities mobilize against Ford’s fast-track bill”, *Canada’s National Observer* (September 30, 2025). A copy of this article is attached as **Exhibit ‘D’**.
- h. Marissa Lentz-McGrath, “‘Youth keep getting stronger’: Fight against Bill 5 continues”, *Timmins Today* (October 1, 2025). A copy of this article is attached as **Exhibit ‘E’**.
- i. Marissa Lentz-McGrath, “Great-grandfather’s war story shapes young Indigenous leader’s path”, *Orillia Matters* (November 11, 2025). A copy of this article is attached as **Exhibit ‘F’**.
- j. Interview by Samuel Raby (November 24, 2025) on Regent Park TV, titled “A Conversation with Ramon Kataquapit, Leading the Okiniwak Youth Movement Resisting Bill-5 and C-5”.

13. I have led or taken part in a range of public events across Ontario to share about the efforts young Indigenous leaders are doing to respond to the growing concerns facing our communities and the dangerous precedent Bill 5 sets, for pollution and assimilation, impacting the spirit and health of our people. The following events are illustrative of my level of commitment to engage and amplify the youth voice:

- a. On September 27, 2025, I spoke at and participated in a community paddling event with over 30 paddlers at Lower Brewers Lock in Kingston, Ontario, to build community awareness about Bill 5 and show solidarity with efforts on the Attawapiskat River to protect nature and Indigenous rights.

Intended for Informational Purposes Only

- b. On September 28, 2025, I participated in the “Raising Our Voices” community concert at the Spire in Kingston, Ontario, where I spoke about Bill 5 and performed some of my songs to raise awareness about the importance of my community’s lands and waters, for climate, biodiversity and our well-being.
- c. On September 29, 2025, I participated in a Bill 5 meeting with civil society organizers and members of other Indigenous organizations, including Mahmo Inninuwuk Wiibuseego-stamok and the Friends of the Attawapiskat River to share efforts to date and discuss collaborative ways forward when bills are put forth by governments that challenge our rights and future.
- d. On September 29, 2025, I delivered a keynote address at the “Indigenous Perspectives on Bill 5” public lecture held at the Isabel Bader Centre of Queen’s University in Kingston, Ontario.
- e. On November 15, 2025, I was an invited guest and speaker at Queen’s University in Kingston, Ontario, at a fundraising gala hosted by Queen’s Backing Action on the Climate Crisis that focused on the impacts of Bill 5.
- f. On November 18, 2025, I delivered a keynote address and spoke on a panel alongside other Indigenous youth and allies at the “Standing for the Land: Taking on Bill 5” public event in Toronto, Ontario to raise awareness about the ongoing impacts and implications of Bill 5, and discuss ongoing efforts against Bill 5, including the efforts of Indigenous land protectors.

Intended for Informational Purposes Only

14. On November 4, 2025, a resolution supporting Okiniwak's youth-led advocacy was passed by NAN at their Fall Chiefs Assembly in Thunder Bay, Ontario, recognizing that "youth movement members are vital as potential future leaders with a crucial role in the preservation of Indigenous knowledge, cultural heritage, so their voices must be heard and amplified." The resolution was moved by Neskantaga First Nation Chief Gary Quisess, seconded by Bearskin Lake First Nation Chief Leon Beardy, and signed by NAN Grand Chief Alvin Fiddler. A copy of the signed resolution titled "Resolution 25/44: Indigenous Youth Movements" is attached as **Exhibit 'G'**.

15. On November 19, 2025, a resolution supporting Okiniwak's youth-led advocacy was passed by the Chiefs of Ontario at their Fall Chiefs Assembly in Toronto, Ontario, recognizing that the participation of youth movements in discussions related to Treaty, land protection, Bill 5, Bill C-5, Special Economic Zones, and other relevant areas must be ensured, as youth movement members' voices are "essential to the preservation of treaty, culture, land and Indigenous knowledge." The resolution was moved by Cat Lake First Nation Chief Russell, seconded by Batchewana First Nation Chief Mark McCoy, and signed by Ontario Regional Chief Abram Benedict. A copy of the signed resolution titled "Resolution 25/27A: First Nation Youth Movements" is attached as **Exhibit 'H'**.

DISTINCT AND USEFUL PERSPECTIVE

16. I seek leave to intervene in this application in order to voice the distinct perspective I have, as an Indigenous youth, resulting from my lived experience and involvement in youth-led actions in response to Bill 5. My perspective is different from the collective rights of the applicant First Nations and if granted leave to intervene, I would submit that the Crown's

Intended for Informational Purposes Only

commitments to advance reconciliation, apply the *United Nations Declaration on the Rights of Indigenous People* and uphold the *Canadian Charter of Rights and Freedoms* gives rise to duties to respect my inherent Indigenous rights as a youth, a community member and rights holder.

17. As a youth, rightsholder, and respected community member, I have direct knowledge and experience of the struggles Indigenous youth face in having their voices heard and the importance of having a platform to to be heard, to share, and to lead.

18. As an Indigenous youth, I offer a unique perspective grounded in both trauma and hope. Bill 5 was developed and passed without us, and represents a betrayal of our future. Every decision made today will affect the ability of our children and grandchildren to live from the land, to hunt, to fish, and to drink clean water. We are taught to think seven generations ahead - and Bill 5 fails to honour this teaching.

19. This application is also of profound importance to me, as I am the first generation since the colonial encounter to be able to use my voice for change and my family and community. I come from a family shaped by residential, day schools, and boarding homes. My great-grandfather fought for Canada in the First World War, even while his children were being taken away. My grandparents attended the St. Anne's Residential School in Fort Albany. My mother attended the J.R. Nakogee Indian Day School and was forced to stay in boarding homes. I am among the first generation outside those systems, yet the effects of intergenerational trauma remain.

20. For me, healing has come through reconnecting what was stolen from my family - by returning to the land, practicing my culture, participating in ceremony, and through advocating for Indigenous self-determination, sovereignty and stewardship to protect the health and rights of

Intended for Informational Purposes Only

our people, the land and the water. The loss of my grandfather during the pandemic sparked my inner fire and instilled a purpose in me to continue his legacy, by exercising our inherent and sacred duty to protect the land. This purpose has guided my path ever since. My health, wellbeing, and survival cannot be separated from the health of the lands, waters, animals and sacred spirits in my community.

21. As youth, we are not merely observers - we are the generation who will live with the consequences. And yet, we have been excluded from the processes that created and passed Bill 5. True reconciliation requires not only listening to Indigenous leadership but empowering Indigenous youth to speak for ourselves. As an Indigenous youth, committed to ensuring that First Nation youth and future generations are represented and heard when laws are being made that directly impact our life and futures, I believe my submissions will be relevant, valuable and helpful to the Court.

22. I believe that Bill 5 is another piece of assimilation for First Nations. When governments pass laws that can override environmental and provincial regulations, hidden in that fine print is the power to override our Treaties - our highest and most sacred law with Canada and Ontario, continuing their legacy of colonization and systemic racism.

23. I believe that, if governments are able to override those Treaties, they can erode our rights, our lands, and even our identity as Indigenous peoples. I believe that Bill 5 sets a dangerous precedent of assimilation - not just taking our lands, but our very status and recognition as sovereign Nations. I believe that Bill 5 sets the stage for further erosion of not only our rights, but those of all Canadians and our environment.

PROPOSED SUBMISSIONS

24. I have reviewed the Factum in Support of Intervention which accompanies the motion for leave to intervene, and I confirm that it offers an accurate reflection of the submissions we intend to make, if this Honourable Court grants us leave to intervene in the application.

25. If granted leave to intervene, I will only make submissions on the legal issues related to the application, drawing on our experience and perspectives described in my affidavit and our written representations.

26. I do not believe my intervention with Michel Koostachin will cause any injustice to the parties or otherwise prejudice their interests because I will accept the record as it stands and will not seek to supplement the record nor costs if granted leave to intervene. Should leave be granted, I will follow the Court's direction with respect to timing, and will not delay the application.

27. I affirm this affidavit in support of the motion to intervene as a friend of the court and for no other or improper purpose.

Intended for Informational Purposes Only

AFFIRMED remotely by video conference by Ramon Kataquapit of the City of North Bay in the District of Nipissing the Province of Ontario, before me at the City of Sudbury in the Province of Ontario on _____ in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely.

Commissioner for Taking Affidavits

Jenna Brunt, LSO #94333B

Ramon Kataquapit