

Comment Form – Draft Permitting Plan and Draft Tailored Impact Statement Guidelines– Federal Review Team

Upper Beaver Gold Project

Response requested by: March 7, 2022

All comments should be submitted via the Submit a Comment feature available on the Project's Canadian Impact Assessment Registry page (Reference #82960 at <https://iaac-aeic.gc.ca/050/evaluations/proj/82960>). Documents can be uploaded using this feature. If you have any difficulties submitting this way, please contact the registry directly at iaac.registry-registre.aeic@canada.ca. All comments submitted using this table would be posted on the Project's Canadian Impact Assessment Registry Internet site.

Please note that this will be your final opportunity to make changes to the Tailored Impact Statement Guidelines.

Department/Agency:	Indigenous Services Canada, First Nations & Inuit Health Branch		
IA Contact:	Debra Nkusi	Telephone:	<Personal information removed>
		Email:	<Email address removed>

Section 1:

1. Confirm that all applicable legislative and regulatory oversight that may apply to the Project, under the authority of your department, is accurately listed in the Permitting Plan.

<p><u>Insert response here:</u></p> <p>N/A</p>
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2. Indicate whether your department has identified any power that it will be unable to exercise to allow the Project to proceed, in whole or in part. For more information, refer to subsection 17(1) of IAA.

<p><u>Insert response here:</u></p> <p>N/A</p> <p>ISC/FNIHB does not exercise power or perform a duty/function under any Act of Parliament in relation to the Project.</p>
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Section 2:

1. Please review the draft Tailored Impact Statement Guideline (TISG) sections that are applicable to your department's mandate.
2. Using the table below, please describe any issues and include your recommendation for how the final Tailored Impact Statement Guidelines should be adapted to address each issue. Please indicate any recommended **additions or deletions** to the text.

Department – Comment ID	Draft TISG Section	Context and Rationale (provide an explanation of your comments)	Recommendation: provide text to be inserted or deleted. Be specific on the location within the draft TISG that the text would be added/deleted.
FNIHB	<p>7. Assessment Methodology 7.1 Baseline methodology</p> <p>Pg 29. Bullet 8 Under 'For all baseline conditions, the Impact Statement must:'</p> <ul style="list-style-type: none"> • describe where and how community or Indigenous knowledge, Indigenous participation and input were considered in determining <u>baseline conditions</u> (e.g. sampling locations, collection of baseline data, and opportunity to review results) <u>on topics such as air quality, water quality, tissue sampling, fish and fish habitat, species at risk, and moose</u> 	<p>1. For "tissue sampling," does this refer to tissue sampling of ..."fish....and moose"?</p>	<p>1. Clarity needed in what the tissue sampling refers to.</p> <p>If 'of' needs to be included.</p>
FNIHB -01	<p>9.1 .3 Biophysical determinants of health Pg 92, Bullet 2.</p> <p>The Impact Statement must:</p> <ul style="list-style-type: none"> •with regard to potential effects on food security 	<p>Sentence does not seem complete</p>	<p>Revise bullet or remove</p>
FNIHB-02	<p>9.1 .3 Biophysical determinants of health Pg 92, Bullet 3.</p>	<p>This footnote reference of "Eating well with Canada's Food Guide" is wrongly placed and should be</p>	<p>Delete only the footnote/reference of Food guide (the text in bullet is ok)</p>

	<ul style="list-style-type: none"> describe changes in terms of their implications for the physical and mental health of Indigenous peoples¹; 	deleted. Canada's food guide is a guide for food groups and recommended servings, and <u>does not</u> describe "changes...for physical and mental health..." as indicated in this bullet.	
FNIHB-03	<p>9.2.2.1 Effects to community well-being Pg 98, Bullet 5</p> <ul style="list-style-type: none"> changes in criminal activity and crime rates; 	With project activities in communities, there are different concerns surrounding safety – which are not necessarily limited to criminal activity	<p>Suggest to modify to add</p> <ul style="list-style-type: none"> changes in community safety/criminal activity and crime rates;
FNIHB-04	<p>9.2.2.1 Effects to community well-being Pg 98, Bullet 10</p> <ul style="list-style-type: none"> changes to services 	Project activities may also result in changes to access of the various services, and/or community programs	<p>Suggest to add:</p> <ul style="list-style-type: none"> changes in access to services/community programs
FNIHB-05	<p>9.2.2.1 Effects to community well-being</p>	Health care systems are often burdened with the influx of workers in a community. Consideration of this needs to be added in the TISG	<p>Suggest to add:</p> <ul style="list-style-type: none"> Pressure on health care system (due to influx of workers)
FNIHB-06	<p>18. Appendix 2- Resources and guidance Human Health Pg 156</p> <p>Eating Well with Canada's Food Guide—First Nations, Inuit and Métis. Health Canada. 2007. Available at:https://www.canada.ca/en/health-canada/services/food-nutrition/reports-publications/eating-well-canada-food-guide-first-nations-inuit-metis.html</p>	Reference link/resource not relevant	<p>Delete this reference</p> <p>¹ Refer to: Health Canada, Eating Well with Canada's Food Guide - First Nations, Inuit and Métis</p>