

Enclosure 1: Federal Authority Advice Record**Response due by September 13, 2023****Great Bear Gold Project****Agency File: 85832**

All comments should be submitted via the [Submit a Comment](#) feature available on the Project's Canadian Impact Assessment Registry page¹. Letters and forms can be uploaded using this feature. If you have any difficulties submitting this way, please contact the Agency at GreatBear@iaac-aeic.gc.ca.

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1. (a) Is it probable that your department or agency may be required to exercise a power or perform a duty or function related to the Great Bear Gold Project (the Project) to enable it to proceed?

If yes, specify the Act of Parliament and that power, duty or function.

Yes, NRCan could issue a licence for the manufacturing and the storage of explosives under the *Explosives Act* to allow the project to proceed.

Blasting will be done using an ammonium - nitrate/fuel oil explosive and/or an emulsion explosive. (p. 18)

The project will require surface and underground explosives storage facilities for the project.

¹ <https://iaac-aeic.gc.ca/050/evaluations/proj/85832>

(b) Please describe any Indigenous or public consultation that will be undertaken in relation to the exercise of that power, duty or function, including when it would take place.

No Indigenous consultation will be required (with respect to the Explosives Act) as this project is over 60km from the closest Indigenous community at Wabauskang First Nation.

2. Is your department or agency in possession of specialist or expert information or knowledge that may be relevant to the conduct of an impact assessment of the Project?

Yes

Specify the specialist or expert information or knowledge.

Physical hydrogeology (quantity and flow) and natural hazards

Depending on final design of the project and associated corridors as well as proposed construction methods, NRCan can provide expertise in support of:

- Forest vegetation and links to biodiversity including SAR habitat concerns as related to Black Ash, migratory birds and caribou, as required by ECCC
- Hydrology in forested areas with links to surface water flows and quality;

Information on the application of the *Explosives Act* and its regulations.

Information on metal leaching and acid rock drainage

3. Has your department or agency considered the Project; exercised a power or performed a duty or function under any Act of Parliament in relation to the Project; or taken any course of action that would allow the Project to proceed in whole or in part?

No

Specify.

4. Has your department or agency had previous contact or involvement with the Proponent or other party in relation to the Project? (for example: an enquiry about methodology, guidance, or data; introduction to the Project)

No

Provide an overview of the information or advice exchanged.

5. Does your department or agency have advice for the Proponent on whether and how they can provide information as part of the impact assessment process to streamline any permits, approvals or authorizations that may be required for the Project by your department or agency?

Specify as appropriate.

No

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6. Does your department or agency have additional information or knowledge not specified, above, including information on the geographic, environmental, economic or social context of the project? (e.g. location of protected or sensitive areas, previous history between local communities and Proponent or similar projects, local or regional social or economic concerns)?

Specify as appropriate.

[Not at this point, however information can be provided if found later in the process.](#)

7. What are the **key issues** likely to be relevant to the public interest decision, based on the mandate and area(s) of expertise of your department, and which should be addressed in an impact assessment of the Project, should the Agency determine that one is required?

For each key issue:

- Describe the effect or the nature of the issue, including any relevant context;
- Provide the rationale and/or evidence for why it is a key issue;
- Identify briefly solutions to the issue, including any information or studies that should be required in the Tailored Impact Statement Guidelines, potential mitigation measures, and/or regulatory requirements relevant to the issue;
- Provide a concise, plain-language summary of the issue for inclusion in the Summary of Issues.

The information provided will be used by the Agency to determine if and an impact assessment is required and where appropriate to develop project-specific draft Tailored Impact Statement Guidelines that focus on the key issues likely to be relevant to the public interest decision.

Please use **Table 1: Key Issues to inform decision-making** to respond to this question.

[See response in Table 1](#)

8. Where possible, identify any clarifications or additional information the Proponent could include in the Detailed Project Description or in the response to the Summary of Issues that would:

- give confidence that an issue or effect could be addressed and managed;
- inform the decision as to whether an impact assessment is required; or
- aid in tailoring the Impact Statement Guidelines if an impact assessment is required.

These clarifications and additional information will be included as specific questions in the Summary of Issues provided to the Proponent.

Please use **Table 2: Clarification or additional information the Proponent could include in the Detailed Project Description or in the response to Summary of Issues** to respond to this question.

Kathy McPherson

Name of Departmental / Agency
Responder

Impact Assessment Officer

Title of Responder

13 September, 2023

Date

Table 1: Key Issues to inform decision-making

The Agency asks that federal authorities align expert advice to comment on whether potential project effects² in areas of federal jurisdiction have been accurately³ characterized and adequate⁴ mitigation to minimize those effects have been presented by the proponent. The Agency requires that advice consider the context and setting of the Project, and the regulatory mechanisms that may be in place to oversee effects in areas of federal jurisdiction. In identifying key issues relevant to the public interest decision, federal authorities should be mindful of the Project’s context (size, scope, location), Indigenous knowledge and perspectives, and public concerns. Key issues that may be relevant to the public interest decision include:

- effects that in areas of federal jurisdiction and that may be significant, based on federal experts’ knowledge and experience with past projects;
- effects that may impact Indigenous peoples and their rights, based on Indigenous knowledge and perspectives or experience with past projects;
- effects on key species or habitats (e.g. at risk, important to Indigenous communities, commercial importance, provide important ecosystem function);
- issues or effects that may result from novel project activities, components or technology;
- effects with large uncertainties, including in the effectiveness of mitigation measures;
- transboundary effects where mitigation measures are limited;
- positive effects, including where project may support other governmental priorities, including reconciliation with Indigenous peoples; and
- key concerns raised by Indigenous or local communities.

Effects that are anticipated to be minor or which can be managed using well understood mitigation measures, existing guidance, and/or other regulatory processes may have simplified information requirements or may be removed entirely. Measured advice from federal authorities on key issues and solutions —and on the scope and detail of any required information and studies — will enable the Agency to focus assessments on issues that are important to participants and to decision-makers.

Comment ID	Valued Component or Factor to Consider	Description of Key Issue (Context and Rationale)	Solutions	Plain language summary for inclusion in Summary of Issues
<p><i>Please identify comments by organization and comment number.</i> e.g.: IAAC-01</p>	<p><i>Identify valued component(s) or factor to consider—within the mandate of your department or agency—to which the effect or issue applies.</i></p>	<p><i>Provide a brief description of the issue and rationale for being a key issue.</i></p> <p><i>Include, where relevant,:</i></p> <ul style="list-style-type: none"> • <i>the pathway of effects;</i> • <i>social, economic or environmental context which are relevant to it being a key issue;</i> • <i>key uncertainties that should be addressed in the impact assessment;</i> • <i>Indigenous or public concerns or perspective;</i> • <i>potential for differential effects among diverse subgroups;</i> • <i>scientific evidence or traditional knowledge, including from past project experience, which supports inclusion as a key issue.</i> 	<p><i>Where applicable, briefly identify solutions to address the potential issue or effects including</i></p> <ul style="list-style-type: none"> • <i>Information or studies required to describe and characterize the effect, should an impact assessment be required; including any guidance for data collection and/or analysis or existing data sources to inform the assessment;</i> • <i>Any powers, duties or functions that your department or agency has that may mitigate, manage, or set conditions related to the effect;</i> • <i>Guidance or policies for mitigating effects or any standard and well-understood mitigation measures that would address the effect, including follow-up monitoring activities; and/or</i> • <i>Commitments the Proponent could make to respond to the issue.</i> <p><i>Where available, please refer to existing text in the TISG template.</i></p>	<p><i>For issues to be included in the Summary of Issues, provide a concise, plain language synopsis of the key issue and any questions or directions for the Proponent.</i></p>

Please insert additional rows as necessary

² *Effects* in this context means effects in areas of federal jurisdiction as defined in section 2 of the *Impact Assessment Act*.

³ For effects in areas of federal jurisdiction, “accurately” means whether the proponent made sufficient effort to clearly (supported by baseline or studies undertaken or planned to be undertaken) characterized the effect (including magnitude, geographic extent, duration, frequency, reversibility, context, etc.).

⁴ For effects in areas of federal jurisdiction, “adequately” means, in relation to project design and/or selection of mitigation measures, whether the proponent has identified reasonable measures to manage and minimize effects in the context of the Project (including, if applicable, follow-up monitoring, and adaptive management).

Table 2. Clarifications or additional information the Proponent could include in the Detailed Project Description or in the response to Summary of Issues

Comment ID	Relevant section of the Initial Project Description	Description of Issue, Concern or Uncertainty	Clarification or additional information	Plain language summary for inclusion in Summary of Issues
<p>Please identify comments by organization and comment number.</p> <p>e.g.: IAAC-01</p>	<p>If the comment is related to a specific section of the Initial Project Description, please provide a reference.</p> <p>You may also choose to copy the relevant text here.</p>	<p>Provide a description of the issue, concern or uncertainty the Proponent could address in their detailed project description that would give confidence that the issue will be addressed and managed, or which could aid in tailoring the Guidelines</p>	<p>Provide recommended clarification or additional information to be included in the Detailed Project Description to address the issue, concern or uncertainty, for example</p> <ul style="list-style-type: none"> • Clarifications to project description (e.g. components, activities, locations or alternatives); • Project design changes that could avoid effects; • Evidence that could be presented to demonstrate there is no effect pathway or that effects will be negligible; • Evidence that standard mitigations will address potential effects; • Commitments the Proponent could make to respond to the issue, including the implementation of federal operational policies or guidance documents. 	<p>For issues to be included in the Summary of Issues, provide a concise, plain language synopsis of the issue and of the question or direction for the Proponent.</p>
<p>NRCan-01</p>	<p>Initial Project Description (July 2023); section C 6.3 pg. 37 Surface Water and Groundwater</p>	<p>The proponent has indicated that baseline groundwater investigation is in progress to collect hydrogeological information of the site including the field investigations (hydrogeological characterization, information on water wells etc.).</p> <p>The proponent has indicated that the underground mine may require de-watering, the open pit may intercept groundwater and that these waters need to be managed.</p> <p>The proponent had indicated that mine impacted water may seep from mine rock and tailings storage facilities.</p>	<p>NRCan anticipates that relevant hydrogeological information that would be made available will include an appropriate groundwater model assessing the potential effects of open pit mining and underground mining activities, as well as the impacts of storage of mine rock and tailings on the receiving environments.</p> <p>The proponent should provide details of de-watering and its impacts on the water levels/water bodies, any surface water groundwater interactions, water diversion, water management in the open pits and other hydrogeological details as necessary. Would monitoring be required for de-watering? If yes, what monitoring data would be provided (e.g., pumping rates, stream and lake gauging data, groundwater level data from monitoring wells) in the EIS.</p> <p>NRCan looks forward to details of the Tailings Management Facility (TMF) as it becomes available. The proponent has indicated that CDA guidelines will be adopted for the dam design. Information on details of seepage</p>	<p>NRCan looks forward to receiving this information as it becomes available during the EA process.</p> <p>NRCan looks forward to receiving information on de-watering impacts, including groundwater levels and the surface water flows.</p> <p>NRCan looks forward to receiving information on seepage quantity, timing, and receiving waterbodies.</p>

			from the TMF/facilities is also anticipated at a later date.	
NRCan-02	IPD (July 2023)	Natural hazards	There is no mention of possible natural hazards at the project site.	It is anticipated that a discussion of natural hazards (following the agency's guidelines) would be made available as the project moves forward in the EA process.
NRCan-03	Forestry / Terrestrial Environment (Section B.3.4 Preliminary list of mine activities)	Details of potential impacts of the proposed project on forest vegetation, biodiversity and SAR habitat and recovery of forested land.	CFS holds expertise to assist in the assessment of: a) Potential local impacts on biodiversity and SAR habitat from project development; Potential impacts on forest land-use change and proposed mitigation measures.	Effects on forested land / terrestrial environment from proposed Project activities, including potential effects to the habitat of Species at Risk
NRCan-04	Forestry / Hydrology in forested areas (Section C.6.3. Surface water and groundwater)	Details of potential local and watershed effects of the proposed Project on hydrology of forested areas.	CFS holds expertise to assist in the assessment of: Potential impacts to hydrology in local forested areas including potential effects on wetlands and where needed a description of proposed mitigation measures.	Effects on surface water in local forested areas from proposed Project activities and proposed mitigation measures

Please insert additional rows as necessary.