

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.

Department/Agency	Indigenous Services Canada
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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.

No. Indigenous Services Canada (ISC) is not responsible for approving or issuing licenses, permits or authorization for the assessments of large, proposed projects.

(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.

Not applicable.

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

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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?

Although this project is not on reserve land, ISC may have specialist or expert information or knowledge relevant to potential adverse effects, and how the project will affect traditional practices for local Indigenous groups.

Indigenous Services Canada has a mandate to support Indigenous people (First Nations, Inuit and Métis) in their efforts to improve social well-being, health and economic prosperity; to develop healthier, more sustainable communities; and to participate more fully in Canada's political, social and economic development.

Indigenous Services Canada also has information and knowledge of Indigenous matters on Federal lands. For example, ISC – Lands and Economic Development may have relevant information on the following areas depending on the final scope of the project: climate change impacts to traditional lands and reserve lands, cumulative effects on traditional territories and reserve lands, the assessment and remediation of chemical contamination of traditional territories and reserve lands.

ISC-First Nation and Inuit Health Branch (FNIHB) areas of expertise include, but are not limited to: the provision of health services; community health and wellness programs; drinking water quality on First Nation reserves; and social determinates of health, such as mental health and addictions, language, diet, chemical contamination of traditional foods or the perception of contamination.

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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.

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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)

To the best of our knowledge, ISC has had no previous contact or involvement with the proponent or other parties in relation to the proposed project.

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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?

Not applicable.

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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)?

No.

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.

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.

Julia Gregory
Name of Departmental / Agency
Responder

Policy Analyst
Title of Responder

September 13, 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
<i>Please identify comments by organization and comment number.</i> e.g.: IAAC-01	<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>	<i>Provide a brief description of the issue and rationale for being a key issue.</i> <i>Include, where relevant,:</i> <ul style="list-style-type: none"> • the pathway of effects; • social, economic or environmental context which are relevant to it being a key issue; • key uncertainties that should be addressed in the impact assessment; • Indigenous or public concerns or perspective; • potential for differential effects among diverse subgroups; • scientific evidence or traditional knowledge, including from past project experience, which supports inclusion as a key issue. 	<i>Where applicable, briefly identify solutions to address the potential issue or effects including</i> <ul style="list-style-type: none"> • 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; • Any powers, duties or functions that your department or agency has that may mitigate, manage, or set conditions related to the effect; • 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 • Commitments the Proponent could make to respond to the issue. <i>Where available, please refer to existing text in the TISG template.</i>	<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>
ISC-FNIHB-01	Community Health and Well-Being	The perception of contamination to the land, water, traditional food sources and Indigenous Peoples by industrial development may be a serious concern for the identified Indigenous Nations; especially for Grassy Narrows and Wabaseemoong First Nations. During the late 1960s and early 1970s, the English-Wabigoon River system was contaminated with inorganic mercury from a pulp mill located upstream in Dryden, Ontario. This discharge of inorganic mercury contaminated their water and traditional food sources (i.e. fish) and lead to cases of mercury poisoning and	ISC-FNIHB recommends that the proponent further engage Indigenous Nations regarding their perspectives on industrial development and contamination. In addition, they should provide the Indigenous Nations with more information on the proposed gold mining process including the chemicals that can be released into the environment, the potential human and environmental health risks associated with these chemicals, their proposed methods for safe management, and mitigation/remediation measures and strategies. Resources for the proponent:	In the 1970s, Grassy Narrows and Wabaseemoong First Nations’ members experienced one of the worst cases of mercury poisoning in the Canadian history due to the industrial contamination of water and aquatic traditional food sources in the area. This contamination has had intergenerational effects on the community (e.g., health, unemployment, disability, suicide, impacts on cultural practices).

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).

		intergenerational challenges. The proponent, Kinross Gold Corporation, started engaging with Grassy Narrows First Nation in 2022, whereas their engagements with Wabauskang First Nation and Lac Seul First Nation began in 2017. Due to Grassy Narrows First Nation's negative and detrimental experience with industrial development, it is recommended that more engagement take place. The Indigenous Nations need to gain a greater understanding of the contaminants that may be released into the environment. They should be provided an opportunity to express concerns or uncertainties about potential exposure to chemicals used in the gold mining process, such as cyanide and heavy metals.	Donna Mergler, a Professor at the University of Quebec in Montreal, recently published <i>The Contribution across Three Generations of Mercury Exposure to Attempted Suicide among Children and Youth in Grassy Narrows First Nation, Canada: An Intergenerational Analysis</i> on July 19, 2023. Link: https://ehp.niehs.nih.gov/doi/full/10.1289/EHP11301 The First Nations Environmental Contaminants Program (FNECP) at ISC has previously funded 3 projects in Grassy Narrows First Nation. It is recommended that the proponent request the associated final reports from the Nation. These reports will provide information on the Nation's perspectives regarding contamination and Indigenous research methodologies.	Through future engagements, the proponent should provide more information on the gold mining process, specifically the chemicals that can be released into the environment, the potential human and environmental health risks associated with these chemicals, their proposed methods of safe management, and mitigation/remediation measures and strategies.
ISC-FNIHB-02	Indigenous Engagement	ISC is of the understanding that Grassy Narrows First Nation has expressed opposition to commercial logging within their traditional territory and, as a result, may be against other forms of industrial development. In April 2023, the Ministry of Natural Resources and Forestry at the Government of Ontario agreed to ban commercial logging in a portion of the Whiskey Jack Forest Management Unit for 10 years; from 2024-2034. The portion of the Whiskey Jack Forest of which no forest management activities are to be planned encompasses 76% of the forest, leaving 24% eligible for planned forest management activities. The Whiskey Jack Forest Management Unit is adjacent to the Red Lake Forest Management Unit.	ISC-FNIHB recommends that the proponent further engage with Grassy Narrows First Nation on their proposed project to ensure community support. Resource for the proponent: <ul style="list-style-type: none"> Long-Term Management Direction for the Whiskey Jack Forest 2024-2034 Forest Management Plan: https://nrp.mnr.gov.on.ca/s/published-submission?language=en_US&recordId=a0z3q00000z0WqAAI 	ISC is of the understanding that Grassy Narrows First Nation has expressed opposition to commercial logging within their traditional territory. As a result, the Nation may also be against other forms of industrial development. The proponent should provide clarification as to how Grassy Narrows First Nation been adequately engaged on the proposed project, and outcomes of their concerns.

Please insert additional rows as necessary

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. e.g.: IAAC-01</p>	<p>If the comment is related to a specific section of the Initial Project Description, please provide a reference. 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>
ISC-FNIHB-03	Section A.4.2 Engagement to Date and	Section A.4.2 Engagement to Date and Planned on page 6 only includes key issues raised by Wabauskang First Nation and Lac Seul First Nation. However, Appendix B Community Input and Outcomes – Indigenous Nations lists key issues raised by Grassy Narrows First Nation. Grassy Narrows First Nation's key issues should be incorporated into Section	ISC-FNIHB recommends that the proponent further engage with the Indigenous Nations, especially Grassy Narrows First Nation and Wabaseemoong Independent Nations regarding their key issues pertaining to the proposed project. The proponent should include all key	Section A.4.2 Engagement to Date and Planned does not include key issues raised by Grassy Narrows First Nation.

	Planned on page 6	<p>A.4.2. The proponent should be transparent and provide a full scope of the key issues, concerns and perspectives of the Indigenous Nations.</p> <p>In addition, Appendix B mentions the Asubpeeschoseewagong Netum Anishinabek Indigenous Protected and Conserved Area (IPCA). IPCAs are lands and waters where Indigenous governments have the primary role in protecting and conserving ecosystems through Indigenous laws, governance and knowledge systems. IPCAs can play an important role in community health and wellbeing. This IPCA is not mentioned elsewhere in the Initial Project Description. It could have implications on the governance and delivery of baseline monitoring and ongoing monitoring programs related to the proposed project.</p>	<p>issues identified by the Indigenous Nations in the body of the Detailed Project Description. In addition, the proponent should seek more information on the Asubpeeschoseewagong Netum Anishinabek IPCA and integrate this into the Detailed Project Description.</p> <p>Resources for the proponent (Indigenous-developed Impact Assessment frameworks and legislation effective in the region):</p> <ul style="list-style-type: none"> • Grand Council Treaty #3 – Manito Aki Inaakonigewin Information Package: http://gct3.ca/wp-content/uploads/2023/02/MAI-Toolkit.pdf • The Anishinaabe Nation in Treaty #3 Manito Aki Inakonigaawin Unofficial Consolidation: http://gct3.ca/wp-content/uploads/2017/07/mai_unofficial_consolidated_copy1.pdf • Grand Council Treaty #3 – Manito Aki Inakonigaawin Project Application Framework: http://gct3.ca/wp-content/uploads/2022/07/GCT3-MAI-Framework-Application-.pdf 	<p>However, <i>Appendix B Community Input and Outcomes – Indigenous Nations</i> does list key issues raised by the Nation. The proponent should include all key issues identified by the Indigenous Nations in the body of the Detailed Project Description.</p> <p>The proponent should continue to engage with the Indigenous Nations on their key issues. In addition, the proponent should seek information on the Asubpeeschoseewagong Netum Anishinabek IPCA and integrate this into the Detailed Project Description, as it may have implications on the governance and delivery of monitoring programs.</p>
ISC-FNIHB-04		<p>The proximity of Wabaseemoong Independent Nations reserve lands and traditional territories indicate potential impacts to community health and wellbeing, as well as social and/or economic conditions; however, the IPD does not indicate engagement with Wabaseemoong Independent Nations or list their concerns.</p>		<p>The proponent should also engage with Wabaseemoong Independent Nations, and include records of engagement in the Detailed Project Description.</p>
ISC-FNIHB-05	Section C.6 <i>Physical and Biological Environmental Setting</i> on page 35	<p>Section C.6 <i>Physical and Biological Environmental Setting</i> on page 35 states that members of the Wabauskang First Nation and Lac Seul First Nation have participated in baseline field programs and have been invited to participate in the summer 2023 Stage 2 archaeological field program. Grassy Narrows First Nation has not participated in the baseline field programs or archaeological field program.</p>	<p>ISC-FNIHB recommends that the proponent engage with and offer to include Grassy Narrows First Nation and Wabaseemoong Independent Nations in the baseline field programs and archaeological field program.</p>	<p>Grassy Narrows First Nation has not participated in the baseline field programs or archaeological field program to date. How will the proponent engage Grassy Narrows First Nation in the baseline field programs and archaeological field program? Has Grassy Narrows First Nation declined the proponent's offer to participate? If so, the proponent should clearly state this in the Detailed Project Description.</p>

				In addition, the proponent should engage with and offer to include Wabaseemoong Independent Nations.
ISC-FNIHB-06	Section C.6.4 <i>Terrestrial Environment</i> and C.6.5. <i>Aquatic Environment</i> on pages 39-40	Section C.6.4 <i>Terrestrial Environment</i> and C.6.5. <i>Aquatic Environment</i> on pages 39-40 mention several terrestrial and aquatic species (e.g., moose, beaver, muskrat, northern pike, walleye, lake whitefish) that may be important traditional food sources for the Indigenous Nations. The proposed project will change the landscape within the project area which may affect these species (e.g., migration or movement from project area, destruction or fragmentation of habitat, introduction of contaminants into freshwater bodies). In addition, Teardrop Lake and Rice Lake contain wild rice marshes. The Indigenous Nations may harvest wild rice from these locations. Therefore, the proposed project may affect cultural practices, access to traditional lands, and harvesting rights.	ISC-FNIHB recommends that the proponent provide more information on the potential impacts to terrestrial and aquatic species from landscape change during the project's implementation. The proponent should complete a Dietary and Food Security Survey to determine what traditional food sources are harvested and consumed, potential food security issues, and the potential health impacts to community members. It is recommended that the proponent review the results of the First Nations Food Nutrition and Environment Study in Ontario and request that Grassy Narrows share the community specific report that includes a food security assessment. Regional results of the study are available at www.fnfnes.ca .	The proposed project will result in landscape changes which may affect the cultural practices, access to traditional lands and harvesting rights of the Indigenous Nations. Describe how landscape change may impact terrestrial and aquatic species that the Indigenous Nations rely on as traditional food sources? Describe any potential implications to Indigenous food security related to landscape change, including change to water table fluctuations. Identify any wild rice harvesting at Teardrop Lake or Rice Lake by Indigenous Nations in baseline land use studies. Complete a Dietary and Food Security Survey to determine what traditional food sources are harvested and consumed, potential food security issues, and the potential health impacts to community members.
ISC-FNIHB-07	Section C.7.1 <i>Site History</i> on page 43	Section C.7.1 <i>Site History</i> on page 43 states that the project site is located within the traditional territories of Lac Seul First Nation and Wabauskang First Nation. It does not mention Grassy Narrows First Nation.	ISC-FNIHB recommends that the proponent confirm that the project site is not located within the traditional territory of Grassy Narrows First Nation. If the project site is located within traditional territory, the proponent should include Grassy Narrows First Nation in the archaeological studies.	Section C.7.1 <i>Site History</i> does not mention whether the project site is located within the traditional territory of Grassy Narrows First Nation. The proponent should confirm whether the project site is located within the Nation's traditional territory and clearly state this

				in the Detailed Project Description. If located within their traditional territory, Grassy Narrows First Nation should be included in archaeological studies.
ISC-FNIHB-08	Section C.7.2 <i>Social Context</i> on page 43	<p>Section C.7.2 <i>Social Context</i> on page 43 mentions that there are four traplines that cross the property and that Lac Seul First Nation has several fishing camps and traplines in the region. The proposed project may affect cultural practices, access to traditional lands, and harvesting rights.</p> <p>Further, Table E.2 indicates potential effects to hunting, trapping, fishing, and tourism from the project, particularly from the larger scale mining operation. No mitigation measures are proposed other than final reclamation at closure. Effects to hunting, trapping, fishing, and tourism may impact Indigenous communities' health, social, and economic conditions.</p>	ISC-FNIHB recommends that the proponent provide more information on the potential impacts to Indigenous traditional food harvesting practices, with specific focus on fishing camps or traplines within the region. The proponent should also identify, through engagement with communities, interconnections between impacts to hunting, trapping, fishing, and tourism and health, and Indigenous communities' health, social, and economic conditions and identify relevant mitigations throughout these pathways of effects as necessary.	How will the proposed project affect Indigenous fishing camps and traplines within the region? What are the potential implications to food security in general? What are the potential implications to the health, social, and economic conditions of Indigenous communities? Appropriate mitigation measures should be identified through engagement with affected communities.
ISC-FNIHB-09	Section C.7.4 <i>Health Context</i> between pages 48-50	<p>Section C.7.4 <i>Health Context</i> between pages 48-50 highlights the various health and social services provided by the Indian Friendship Centre in Red Lake, Wabauskang First Nation Health Office, Lac Seul First Nation Health Department, and Grassy Narrows First Nation Medical Centre. The proposed project may place additional strain on existing Indigenous health services in the region by:</p> <ul style="list-style-type: none"> • Increasing the rates of sexual and domestic violence amongst Indigenous women; • Increasing access to and use of alcohol and drugs amongst Indigenous community members; • Decreasing the mental health of Indigenous youth and community members due to the loss of traditional food sources, cultural practices, access to traditional lands and harvesting rights. <p>The Initial Project Description states that approximately 500 to 1,000 permanent jobs will be created from the proposed project. However, it is not clear whether positions will be largely filled by the local workforce or if workers will be brought into the region. The influx of workers may add additional pressures to the local health system; where human and financial capacity challenges may already exist.</p>	<p>ISC-FNIHB recommends that the proponent provide more information on the potential impacts to Indigenous health services and community health and wellness programming within the region (e.g. access to social services, mental health services and healthcare). In addition, the proponent should provide more information on the potential health impacts to Indigenous women, youth and community members. The proponent should complete a Gender-based Analysis Plus (GBA Plus) analysis that addresses and fulfils the Missing and Murdered Indigenous Women and Girls (MMIWG) Calls for Justice 13.1-13.5. Furthermore, the proponent should:</p> <ul style="list-style-type: none"> • Create and enforce harassment, alcohol and drug policies for the worksite; • Provide mandatory cultural competency training for workers; and • Contribute to local mental health services/programming in the region. <p>Resources for the proponent:</p> <ul style="list-style-type: none"> • Reclaiming Power and Place: The Final Report of the National Inquiry into Missing and Murdered Indigenous Women and Girls: https://www.mmiwg-ffada.ca/final-report/ • Calls for Justice: https://www.mmiwg-ffada.ca/wp-content/uploads/2019/06/Calls_for_Justice.pdf • Indigenous Women and Impact Assessment Final Report, Native Women's Association of Canada (March 2020): https://app.nwac.ca/resource/indigenous-women-and-impact-assessment-final-report/ 	The proposed project may place additional strain on the existing Indigenous health services in the region (e.g., increase rates of sexual and domestic violence against Indigenous women, increase access to alcohol and drugs, decrease the mental health of community members). The proponent should provide more information on the potential impacts to Indigenous health services and community health and wellness programming in the region. In addition, the proponent should provide more information on the potential health impacts to Indigenous women, youth and community members. The proponent should complete a GBA Plus analysis that addresses and fulfils the MMIWG Calls for Justice 13.1-13.5. Furthermore, the proponent

				should describe how they will mitigate impacts to health services and Indigenous Peoples.
ISC-FNIHB-010	Section E.6 Wastes and Emissions between pages 70-73	Section E.6 Wastes and Emissions between pages 70-73 lists several project activities (aspects of the gold mining process) that may be of concern to the Indigenous Nations. For example: <ul style="list-style-type: none"> • The discharge of excess treated effluent by pipeline to the Chukuni River; • Tailings management; • The storage of project related chemicals and petroleum products; • The potential for contaminants, such as ammonia, hydrocarbons and cyanide, to enter into nearby water bodies; and • Dust (suspended particulate) control measures. 	ISC-FNIHB recommends that the proponent provide more information on the potential composition and impacts of wastes and emissions/effluents on the exposure and health of Indigenous Peoples, as well as continue engagement with the Indigenous Nations on these topics.	The proponent should provide more information on the potential impacts of wastes and emissions on the health of Indigenous Peoples, as well as continue to engage with the Indigenous Nations on these topics. How will the proponent mitigate potential impacts from wastes and emissions to the land, water, traditional food sources and Indigenous Peoples?
ISC – LED-01	A.4.2 Engagement to Date and Planned Page 7	Indigenous engagement should include a compilation of dates and results for each activity/event.	ISC recommends the proponent to maintain a record for each Indigenous engagement activity. Detailed records are required to better understand concerns of Indigenous communities, and potential impacts to Indigenous wellbeing, as well as the proponent’s approach to addressing those concerns.	Please include a detailed, disaggregated record of Indigenous engagement for each activity. Include dates; data or comments collected; and responses to comments. (Make improvements to Appendix B)
ISC – LED-02	A.4.2 Engagement to Date and Planned Page 7	Baseline studies should include social and economic conditions in communities, such as interconnections between employment and housing, infrastructure (water/sewer), electricity, and education programming, This baseline will support an analysis of the effects from and effectiveness of proposed employment and education plans/activities. Baseline study of existing Indigenous businesses that could participate in the project, and whether they are available to participate, or opportunities to develop joint business ventures. This should not be limited to on-reserve businesses, but regional-based businesses as well.	ISC recommends baseline studies include impacts to social conditions in communities: how employment will affect the housing, infrastructure (water/sewer), electricity, education programming, proposed employment and education plans/activities. ISC recommends baseline study of existing Indigenous business that could participate in the project, and whether they are available to participate, and or create joint business ventures that support business development. This should not be limited to on-reserve businesses, but regional-based businesses as well. The proponent should ensure the Indigeneity of the business and persons claiming to be Indigenous that support the employment goals.	Proponent engage with Indigenous communities to develop social impact studies that include the housing, infrastructure (water/sewer), electricity, education programming, proposed employment and education plans/activities. Proponent engage with Indigenous communities to develop business studies that include existing Indigenous business that could participate in the project, and whether they are available to participate, and or create joint business ventures that support business development. This should not be limited to on-reserve businesses, but

				include regional-based Indigenous businesses as well. Proponent describe how it will establish confirmation of the Indigeneity to meet its employment and business goals with Indigenous people.
ISC – LED-03	A.4.2 Engagement to Date and Planned Page 7	When undertaking engagement, Indigenous people will see the big picture and potentially provide greater participation if maps, such as watershed maps and trap line maps, are provided. This may help identify other Indigenous communities or land-based practitioners in identifying traditional lands and potential pathways of effects.	ISC recommends the proponent provide a watershed map during engagement, as shown in Figure C-5 of the IPD. In discussions with the Province, consider the inclusion of a trap line map to aid in the engagement with Indigenous trap line holders. This will also determine if any community within the Treaty 5 and Treaty 9 communities of traplines are impacted.	The proponent should present additional maps and visual aids, including a watershed map and trap line map to support engagement.
ISC – LED-04	E.3 Potential Effects to Indigenous Peoples – Heritage, Traditional Lands and Other Pages 61-	Stage 1 Archeological Assessment is normally a desk-top study. ISC acknowledges there are limitations to this approach. Any future archaeological, heritage and traditional lands studies should consider tangible and intangible cultural heritage. UNESCO definition of intangible cultural heritage : “[Intangible cultural heritage] is comprised of living expressions inherited from our ancestors, such as oral traditions, performing arts, social manners, rituals, festive events, knowledge and practices related to nature and the universe.” When engaging with Indigenous communities, encourage the identification of living expressions or other values.	Colonial legacies of indigenous cultural repression, in Canada, including through articles of the Indian Act prior to 1951 has, for some people, resulted in a reluctance to share information about their cultural heritage. Engagement on identification of heritage resources for the purposes of the assessment should be undertaken with sensitivity, and consider the range of living expressions included in the UNESCO definition of intangible cultural heritage.	The proponent should work directly with Indigenous communities to support the sharing of information and knowledge about potential impacts to culture and heritage, including identifying the most appropriate methods to collect and record these.
ISC – LED-05	Page 66, Table E.2. Preliminary Summary of Potential Environmental Effects	The table provided list various anticipated project effects, including the socio-economic ones. The following considerations or categories of effects are listed: Benefits including employment and procurement opportunities - Benefits for education and training opportunities - Potential for effects on healthcare services and providers - Effects on traffic due to mine personnel commuting to site	Further data regarding employment should be provided, broken down by the construction stage and operational stage of the mine. The IPD states the mine will create “500 to 1,000 jobs” but does not specify how many of these would be short or long-term jobs. The IPD should also specify the types of economic benefits, if applicable to the project, that could be accessed by impacted Indigenous communities (i.e. direct jobs, apprenticeships in the industry, etc).	The proponent should disclose a fuller picture of the anticipated short term and long term economic effects, including direct positive contributions (jobs, training opportunities) and should distinguish between the construction phase and the operations phase. By doing this, one would have a realistic context for estimating the extent of economic opportunities for First Nations members in the region.
ISC-LED-06	Page 68, E.4. Potential Effects on Indigenous Peoples	In this section, it states, amongst other considerations, that the proponent will study and provide more understanding of the following: - Contribution to cumulative effects already being experienced in the region	ISC recommends that the proponent include a discussion (in the Detailed Project Description) of how the proposed new mine would add to the effects of the mining industry already existing in the region (cumulative effects relative to the sector’s footprint), as well as describe	Given that the mining industry is well established in the wider region and has a long history there, it would be

		<ul style="list-style-type: none"> - Impacts to physical and social infrastructure in the region including road safety and the availability of social services. 	<p>other types of industrial or resource developments to which it would add (cumulative effects in the overall scheme of human industrial activities).</p> <p>If possible, include a point about the potential for cumulative effects that would negatively impact Woodland Caribou, a protected species of cultural importance to NW Ontario First Nations.</p>	<p>very helpful to understand how or to what extent the Great Bear Gold project will contribute to various kinds of cumulative effects, whether they be strictly bio-physical in nature or have socio-economic or cultural impacts on the region's residents, including Indigenous (on-reserve) communities.</p>
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Please insert additional rows as necessary.