

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

**Great Bear Gold Project**

**Response required by: June 5, 2024**

All comments should be submitted via the Submit a Comment feature available on the Project’s Canadian Impact Assessment Registry page (<https://iaac-aeic.gc.ca/050/evaluations/proj/85832?culture=en-CA>). Documents can be uploaded using this feature. If you have any difficulties submitting this way, please contact the Registry directly at [registry-registre@iaac-aeic.gc.ca](mailto:registry-registre@iaac-aeic.gc.ca). All comments submitted using this form will be posted on the Registry website for the Project.

Please note that this is your opportunity to customize the draft Tailored Impact Statement Guidelines.

Department/Agency:	Indigenous Services Canada		
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**Section 1 – Draft Permitting Plan:**

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

**Insert response here:**

Indigenous Services Canada (ISC) is not responsible for approving or issuing licences, permits or authorizations for the assessments of large, proposed projects.

2. Indicate whether your department or agency 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, please refer to subsection 17(1) of the IAA.

**Insert response here:**

ISC has not identified/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 (including provision of financial assistance) that would allow the Project to proceed in whole or in part.

**Section 2 – Draft Tailored Impact Statement Guidelines:**

1. Please review the draft Tailored Impact Statement Guidelines (the Guidelines) sections that are applicable to your department’s or agency’s mandate.
2. Using the table below, given the context of the Project, please provide any comments and include your recommendation for how the final Tailored Impact Statement Guidelines should be adapted to address any comments.

- Please indicate any corrections, additions or deletions that should be made to the text. Please provide a clear context and rationale for your recommendations.
- Federal expert advice should be commensurate to the situational context of the Project and informed by risk-based prudence and evidence in the proponent’s Detailed Project Description<sup>1</sup> and Response to the Summary of Issues<sup>2</sup>, with a strong reliance on well-understood mitigation measures, existing guidance, and regulatory instruments that will manage effects.

Department – Comment ID (e.g., ECCC-01)	Draft Guidelines 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 Guidelines that the text would be added/deleted.
ISC-01	General comment	Suggest adding “culture” wherever there is reference to “potential environmental, health, social and economic effects” as it may constitute a distinct valued component of significance to Indigenous participants	Recommend including “culture” throughout the document amongst the list of valued components (i.e., “environmental, health, social, <b>cultural</b> and economic”) that may be potentially impacted by project activities
ISC-02	3.4. Project components and activities Pg. 13	Under “Suspension, abandonment and decommissioning” include water monitoring and describe any agreements with Indigenous communities	Add to the bullet: <ul style="list-style-type: none"> <li>• suspension, abandonment or decommissioning for temporary or permanent facilities, <b>and any water monitoring or other agreements with Indigenous communities to facilitate decommissioning.</b></li> </ul>
ISC-03	3.5. Workforce requirements Pg. 13	Add a bullet to address business opportunities and partnerships with Indigenous Communities	Add a bullet: <ul style="list-style-type: none"> <li>• Business opportunities and partnerships with Indigenous-owned and/or sourced businesses</li> </ul>
ISC-04	6. Description of Engagement with Indigenous Communities Pg. 20	The proponent should identify how “free and Informed consent” will be accomplished	Add to the last paragraph on Page 20: <p>The record of engagement and inclusion of Indigenous Knowledge in the Impact Statement should demonstrate that the proponent sought to build consensus and obtained the agreement, <b>or free, prior, informed consent</b>, from specific Indigenous communities.</p>
ISC-05	6.4. Collaboration with Indigenous Peoples following the submission of	For the purposes of the Impact Statement the proponent should describe how it will work with Indigenous communities if/when ownership changes throughout the stages of the project	Add bullet to 6.4: <ul style="list-style-type: none"> <li>• describe how it will work with Indigenous communities if/when ownership changes, throughout the stages of the project.</li> </ul>

<sup>1</sup> <https://iaac-aeic.gc.ca/050/evaluations/document/155992>

<sup>2</sup> <https://iaac-aeic.gc.ca/050/evaluations/document/153313>

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	the Impact Statement Pg. 26		
ISC-06	7.2. Selection of valued components Pg. 28	Add an example of a proxy VC	Provide an example to the bullet referring to a “proxy VC”
ISC-07	7.2. Selection of valued components Pg. 29	Recommend adding a valued component that assesses particularly sensitive conditions/components	<p>Add sub-bullet under the following bullet:</p> <ul style="list-style-type: none"> <li>• health, social and economic conditions of Indigenous Peoples, including: <ul style="list-style-type: none"> <li>○ conditions/components that have been impacted and/or exacerbated by existing activities</li> </ul> </li> </ul>
ISC-08	7.3.1. Spatial boundaries Pg. 30	Spatial boundaries should include potable water sources for First Nations communities and municipalities	<p>Add bullet under “define spatial boundaries by taking into account:”</p> <ul style="list-style-type: none"> <li>• identify First Nations and municipal potable water sources</li> </ul>
ISC-09	7.3.2. Temporal boundaries Pg. 31	Temporal boundaries should include potable water sources for First Nations communities and municipalities	<p>Add bullet under “define temporal boundaries by taking into account:”</p> <ul style="list-style-type: none"> <li>• identify First Nations and municipal potable water sources</li> </ul>
ISC-10	7.5. Mitigation and enhancement measures Pg. 33	<p>The Impact Statement must describe mitigation measures to contamination of potable water sources that could affect a community or compound to multiple communities under a catastrophic spill.</p> <p>Add First Nation involvement in water monitoring</p>	<p>Add bullet under “describe mitigation measures that are specific to each environmental, health, social or economic effect identified in the effects assessment including:”</p> <ul style="list-style-type: none"> <li>• describe mitigation measure to contamination of potable water sources that could affect a community or compound to multiple communities under a catastrophic spill.</li> <li>• Describe groundwater and surface monitoring programs, including First Nation interests or involvement throughout the stages of the project.</li> </ul>

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ISC-11	7.5	For those mitigation measures intended to address effects to the environmental, health, social and economic conditions of Indigenous Peoples or impacts on rights of Indigenous Peoples, provide a description of the consultation with Indigenous communities regarding the residual effects	Recommend that all mitigation measures be consulted on with Indigenous communities. It is not up to proponent to decide what does or does not impact First Nation communities.
ISC-12	8.3.3. Mitigation and enhancement measures Pg. 43	Should there be any acid generating and/or metal(loid) leaching mine waste that impacts First Nations lands or communities the impacted First Nations should be involved in the identification and monitoring of such waste	Add bullet under “describe tailings management strategies, including:” <ul style="list-style-type: none"> <li>measures and strategies to include impacted First Nations in identification and monitoring of tailings waste</li> </ul>
ISC-13	8.6.3. Mitigation and enhancement measures Pg. 57	Should there be any effects on quantity and quality of surface water or groundwater that impacts First Nations drinking water and/or other water usage the impacted First Nations should be involved in water quantity and quality monitoring	Add bullet under “The Impact Statement must:” <ul style="list-style-type: none"> <li>describe any measures and strategies to include impacted First Nations in the identification and monitoring of effects on water quantity and quality</li> </ul>
ISC-14	10.2.1. Effects to community well-being Pg. 94	Under social and infrastructure conditions of Indigenous Peoples include support for social assistance recipients to obtain opportunities for employment, on the job and other skills training.	Add bullet under “The Impact Statement must:” <ul style="list-style-type: none"> <li><b>Describe opportunities that support employment and contribute to training, both job training and other skills training, for those on social assistance (including wage subsidy programs for First Nations participating under the 1965 Agreement).</b></li> </ul>
ISC-15	10.2.1. Effects to community well-being Pg. 94	Add reasons for migration	Add to the 3 <sup>rd</sup> bullet: <ul style="list-style-type: none"> <li>Describe in and out migration effects including changes in population, <b>and if possible the reason(s) for migration, (e.g., overcrowding, chronic illness/disease, etc.),</b> and any differential....</li> </ul>

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ISC-16	11.2. Mitigation and enhancement measures Pg. 99	Add a new bullet to include measures aimed to increase employment opportunities for individuals on social assistance	Add bullet: <ul style="list-style-type: none"> <li>identify employment opportunities and contribute to training, both job training and other skills training, for those on social assistance, including wage subsidy programs under the 1965 Agreement.</li> </ul>
ISC-17	12.5. Mitigation and enhancement measures PG. 112	Some impacts can not be measured. The proponent must work respectfully with each respective First Nation to identify cultural attributes that are significant, but not measurable, and address collaborative solutions for mitigation.	Add a bullet: <ul style="list-style-type: none"> <li>work respectfully with each respective First Nation to identify impacts that are significant, but not measurable, and address collaborative solutions for mitigation</li> </ul>
ISC-18	13.3 Emergency management Page 116	Any plans to develop Impact Benefits Agreements should include communications plans with First Nations regarding emergencies	Add a bullet: <p>Indicate that communications plans regarding emergencies should be included in negotiated Impact Benefits Agreements with First Nations</p>
ISC-FNIHB-01	Section 8.6.2 Effects to groundwater and surface water	Access to clean drinking water for First Nations communities.	Add a bullet: <ul style="list-style-type: none"> <li><b>evaluate the capacity of drinking water treatment plants to handle accidental or malfunction scenarios that could result in elevated contaminant levels;</b></li> </ul>
ISC-FNIHB-02	Section 9.1 Health Conditions - Baseline Conditions	To understand the community context and baseline health profile for Indigenous Peoples, the Impact Statement should seek to include the up-to-date information on baseline environmental public health conditions, including: Access to clean drinking water for First Nations communities.	Modify existing bullet: <ul style="list-style-type: none"> <li>describe drinking water sources, both surface and/or groundwater (permanent, seasonal, periodic or temporary), including approximate wellhead capture zones and the distance from project activities; <b>and if applicable any drinking water treatment plants on reserves and their source water;</b></li> </ul>
ISC-FNIHB-03	Section 9.1 Health Conditions - Baseline Conditions	To assess the effects of avoidance and perceived contamination that may result from impacts from the Project, it is important to understand if there are existing country foods that are being avoided.	Modify existing bullet: <ul style="list-style-type: none"> <li>describe the access to, and consumption of, country foods (traditional foods) by Indigenous Peoples as a health-related behaviour, including what species are used, quantities, frequency, harvesting locations and how the data were collected (e.g. <b>site-specific consumption surveys,</b></li> </ul>

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			First Nations Food, Nutrition & Environment Study); <b>and if applicable what country foods are currently being avoided because of perceived contamination;</b>
ISC-FNIHB-04	Section 9.2.2 Social Determinants of health	To assess the Project’s potential impacts on healthcare services that Indigenous People rely on.	Add a bullet: <ul style="list-style-type: none"> <li>• <b>describe impacts to health centres or health services used or frequented by Indigenous communities. Consider potential impacts from an increased population during construction/operation, and stresses on healthcare resources from the project. Consider accident/malfunction scenarios that may cause a unexpected elevated load on health services;</b></li> </ul>
ISC-FNIHB-05	Section 9.2.2 Social determinants of health	<p>Diet plays an important role in individual and community health and poor diet can lead to chronic conditions such as obesity, diabetes and cardiovascular disease.</p> <p>Physical activity is essential for maintaining an individual’s health.</p> <p>Communicable diseases pose a significant public health risk and the potential for the Project to impact communicable disease transmission should be assessed.</p> <p>Chronic diseases are a significant burden on healthcare services and the Project’s potential to impact chronic disease rates should be assessed.</p>	Add following bullets to 9.2.2: <ul style="list-style-type: none"> <li>• <b>assess the effects on diet</b></li> <li>• <b>assess the effects on physical activity levels</b></li> <li>• <b>assess the effects on communicable disease rates</b></li> <li>• <b>assess the effects on chronic disease rates</b></li> </ul>
ISC-FNIHB-06	Section 9.3 Mitigation and enhancement measures	To ensure that the people that may be most impacted by an effect of the Project have input into how the impact may be mitigated.	Add new guideline: <ul style="list-style-type: none"> <li>• <b>Mitigation measures that are intended to mitigate a potential impact to Indigenous People or an Indigenous community should be developed cooperatively and in consultation with those Indigenous communities.</b></li> </ul>

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ISC-FNIHB-07	<p>Section 12 Indigenous Peoples;</p> <p>Section 12.3 Health, social, and economic conditions of Indigenous Peoples</p>	<p>The TISG is extremely comprehensive, this completeness, however, greatly reduces its readability and the ability of a non-technical audience to fully participate in the process of providing feedback to this document.</p> <p>Barriers should be eliminated or reduced wherever possible to encourage the participation of First Nations communities in all stages of the impact assessment process that may be impacted by the Project. It may be beneficial to contain all relevant impacts to the Indigenous communities in one section. While Indigenous Peoples Section 12 of the TISG does reference previous sections, particularly Section 12.3 on page 108 references sections 9, 10, 11 as part of the requirements when determining impacts to Indigenous People, this could go further to provide all the relevant requirements within this section rather than just referencing them.</p> <p>Additionally, the large amount of technical language could be considered a barrier for a reviewer with a non-technical background or previous experience reviewing this style of document. A plain-language summary of each section available for review would improve accessibility to communities that may be impacted.</p> <p>While the approach of consolidating impacts to Indigenous People within one section may increase some duplication within the document, it will also increase accessibility to</p>	<p>a) Guidelines related to impacts to the health, social and economic conditions of Indigenous Peoples should all be contained within Section 12.3, and all impacts to Indigenous People should be contained within Section 12 of the document.</p> <p>b) A plain-language summary describing the requirements contained within Section 12, and more specifically Section 12.3 should be provided alongside the document. Communities should be able to comment on either the draft TISG or the plain-language summary document.</p>

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		communities that may be most impacted by the Project.	
ISC-FNIHB-08	Section 17.4 Adaptive management plans	Adaptive management plans that would be developed by the Project proponent have to ensure, as a standard practice, that potentially impacted communities have a say in what the adaptive plans contain and how the plans are developed.	Add new guideline: <ul style="list-style-type: none"> <li>• <b>Adaptive management plans should be developed in consultation with potentially impacted Indigenous communities.</b></li> </ul>

*Insert as many rows as applicable*