

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

Great Bear Gold Project

Response required by: June 7, 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. 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:	Employment and Social Development Canada		
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Draft Tailored Impact Statement Guidelines:

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.
ESDC-01	7.0 – Assessment Methodology	It is recommended that baseline information on childcare within the broader communities be provided, in addition to baseline information being requested on childcare for Indigenous Peoples, in order to determine the current status of childcare within those communities.	Text to be inserted in section 7.2 Selection of valued components (pp. 27-28): <i>Other health, social and economic conditions that may contribute to sustainability in Canada, including:</i> <ul style="list-style-type: none"> • Access to childcare.
ESDC-02	10.0 - Social Conditions	It is recommended that demographic and labour market information on persons living near the Project be provided in order to assist in developing the necessary social conditions for the Project’s development,	Text to be inserted in section 10.1 Baseline conditions (p.92): <i>It is recommended that a description of the main economic activities in the study areas, including demographic and labour market information for members of the local and regional population be provided.</i>
ESDC-03	11.0 – Economic Conditions	It would be beneficial to outline how the Proponent will address layoffs of the Project’s labour force - at all stages of the Project’s life cycle - in particular for systematically under-represented groups (ie. women, Indigenous Peoples).	Text to be inserted in section 11.2 - Mitigation and enhancement measures (pp. 99-100): <ul style="list-style-type: none"> • An outline of what assistance will be made available to the Project’s labour force if they are laid off at any stage of the Project’s life cycle

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			<i>and in particular for systematically under-represented groups (ie. women, Indigenous Peoples).</i>
ESDC-04	11.0 – Economic Conditions	The draft TISG makes mention of the Indigenous Skills and Employment Training (ISET) Program (pg.98); however, the draft TISG would benefit by articulating what the overall positive benefits are to Indigenous Peoples in accessing the ISET Program, especially with respect to economic conditions and outcomes.	N/A
ESDC-05	11.0 – Economic Conditions	More detail on the characteristics of employee wages could be provided in this section for a better understanding of the Project’s impact on workers and on the local, regional, and national economy.	Text to be inserted in section 11.1.1 Employment (p.97): <ul style="list-style-type: none"> <i>An estimate of direct, indirect or induced income or wages and benefits, including a comparison to the industry average, the local average, the provincial average, the regional average, and the national average.</i>
ESDC-06	11.0 - Economic Conditions	An outline of the Project’s approximate budget on local investment (i.e. expenditures on goods and services and training) would be beneficial in order to have a better understanding of how the impacted community will benefit from the Project.	Text to be inserted in section 11.1.2 Business environment and local economy (p.98): <ul style="list-style-type: none"> <i>An outline of the Project’s budget with respect to local investment and all relevant categories of spending.</i>
ESDC-07	11.0 - Economic Conditions	Greater detail in this section on employment characteristics, such as average wages, income distribution and benefits and employment stability of Indigenous employee wages would give a more fulsome understanding of the Project’s impacts on workers and on the local, regional, and national economy.	Text to be inserted in section 11.1.2 Business environment and local economy (pp.98-99): <ul style="list-style-type: none"> <i>To provide an estimate of the average wages, income distribution and benefits and employment stability of Indigenous employee wages that are associated with the Project.</i>
ESDC-08	12.3 - Health, social, and economic conditions of Indigenous Peoples	This section would benefit with more detail on projected employment opportunities regarding Indigenous peoples in order to adequately assess the economic benefits stemming from the Project.	N/A

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		<p>This section of the TISG would benefit if guidelines were provided regarding community consultation by the Proponent and engagement with relevant tribal council members to develop a partnership that supports employment outcomes and quality social services, such as childcare.</p>	

Insert as many rows as applicable