

**Comment Form - Draft Tailored Impact Statement Guidelines and Draft Cooperation Plan – Provincial Review Team**

**Great Bear Gold Project**

**Deadline: 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). Please note that all comments submitted using this form will be posted on the Canadian Impact Assessment Registry website for the Project.

Please note that this is your opportunity to provide input to the Tailored Impact Statement Guidelines.

Ministry:	Natural Resources & Forestry		
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**Section 1 – Draft Tailored Impact Statement Guidelines:**

1. Please review the draft Tailored Impact Statement Guidelines (the Guidelines) sections that are applicable to your ministry’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 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.
  - Please consider that 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..

Ministry – Comment ID (e.g., MNRF-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 where the text would be added/deleted.
MNRF-01	8.7	Vegetation, Riparian, and wetland environments: Amphibians and reptiles are found in riparian and wetland environments. In Section 8.7.3 Mitigation and enhancement measures, there is no description of how the impacts to these species will be mitigated in these particular environments.	Consider including direction related to the assessment of amphibian and reptile habitat as well as associated mitigation measures.

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

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

Ministry – Comment ID (e.g., MNRF-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 where the text would be added/deleted.
MNRF-02	8.8	Fish and fish habitat: Changing in fishing access is mentioned in Section 8.8.2 Effects to fish and fish habitat. In Section 8.8.3 Mitigation and enhancement measures, no mitigation and enhancement measures are mentioned to offset increased or decreased fishing pressure.	Consider including direction related to mitigation of impacts to fishing pressure.
MNRF-03	8.11	Species at risk and their habitat: Snapping Turtles are listed as special concern in Ontario and have an overlapping range with the project area. There is no mention of this species in Section 8.11 and if/how this species will be considered during the assessment.	Consider adding Snapping Turtles to the listed species in Section 8.11. Consider adding direction related to the assessment of Snapping Turtle habitat and associated mitigation measures.
MNRF-04	6	Description of Engagement with Indigenous Communities in reference to what the proponent must include in Section 4.1 of the Indigenous Engagement and Partnership Plan, Recommend the proponent extend invites to the communities identified that may be impacted to have reps participate in monitoring programs. Also recommend Proponent to indicate if there is potential for Kinross to employ a member from either of the First Nations communities to take on a First Nations Environmental Monitor/Technician role to work with Kinross and the communities and deliver report backs to the FNs. Many communities have difficulty trusting industry which makes it hard to build a relationship, allowing someone they trust to work with the company may be a good start to building a relationship.	Consider adding guidance to Section 6 or Section 17 related to engaging with Indigenous communities for project monitoring.
MNRF-05	5	Describes public participation and views regarding the lands affected by the proposed project. It is important to ensure Commercial Outposts Camps and nearby neighbors on impacted lakes are part of the subgroups of the	Consider adding broader guidance on the participation of stakeholders in the area.

Ministry – Comment ID (e.g., MNRF-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 where the text would be added/deleted.
		community directly being engaged as the project may pose impacts such as, noise, land value changes (+/-), fishing/hunting opportunities for guests due to potential changes to riparian, wetland and terrestrial environment's, etc.	
MNRF-06	9, 10, 11	Describes the current state of physical, mental, social determinants of health on Indigenous peoples, as well as economic conditions impacting Indigenous Peoples. Are there considerations to the general residents of the surrounding communities such as, the municipalities of Red Lake and Ear Falls? There is recreational importance throughout the area of the proposed project that can impact other residents from the surrounding communities (e.g. limiting access, fish/hunting, gathering/foraging consumption, noise, light levels, etc.)	Consider broadening the scope of these sections to include the general public and local stakeholders.

**Section 2 – Draft Cooperation Plan:**

3. Please review the draft Cooperation Plan sections that are relevant to your ministry, including Appendix 1. Please indicate any recommended corrections to the text and confirm whether the preliminary list of relevant provincial regulatory mechanisms in Appendix 1 is accurate.

Table 1 has 2 rows which include OMNRF and OMNRF/MECP. The regulatory mechanisms should be separated to reflect the appropriate responsible entities as in Appendix 1. For example, OMNRF is not involved with overall benefit permits for species at risk.

Appendix 1 outlines possible authorizations that may be required from MNRF to support mine construction and operation. The RSFD Class EA screening categories will depend on the scope of these activities. For those activities that are screened to a Category C, it would likely be possible to coordinate the technical requirements for MNRF's Environmental Study Report with IAAC's technical requirements as per Table 1.

It is also likely possible that information within reports prepared as part of the impact assessment process could support RSFD Class EA reviews. The sequencing of these reviews however will be dependent on the timing of proponent permitting requirements.