



May 30, 2024

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Introduction

Kinross Gold Corp. (Kinross), a Canadian-based gold and silver mining company founded in 1993 and headquartered in Toronto, Ontario, Canada, that has a diverse portfolio including six operating mines. Kinross is committed to establishing a long-term presence in northern Ontario, returning to its roots in the Province, through the development and operation of the Great Bear Project, a proposed underground and open pit gold mine. Kinross appreciates the opportunity to provide the comments below on the draft Tailored Impact Statement Guidelines (TISG) for the Project issued on May 8, 2024.

Effect of Potential *Impact Assessment Act* Amendment

As indicated in the Introduction, Kinross acknowledges that the draft TISG document is being provided to continue to advance the Project through the Impact Assessment process while recognizing that Impact Assessment Act (IAA) legislative amendments are pending. Kinross appreciates the efforts of the Impact Assessment Agency of Canada (IAAC) to continue to progress the Planning Phase of the Impact Assessment process.

Kinross would appreciate additional clarity from IAAC regarding how the legislative amendments to the *Impact Assessment Act* related to federal jurisdiction will be reflected in the final content requirements of the Impact Statement for the Great Bear Project. If the TISG are finalized in advance of Federal legislative amendments being promulgated, will IAAC review and amend the final TISG to refocus on areas within Federal jurisdiction, and specifically areas where there is the potential for adverse effects within Federal jurisdiction consistent with the Supreme Court of Canada decision on constitutionality.

Requirements for Supporting Baseline Studies and Effects Modelling

Kinross and its predecessors have been conducting environmental investigations on the Project site since 2018, with greatest focus starting in 2022 to present. Multi-disciplinary environmental baseline investigations have been designed and implemented to document background conditions in support of the assessment of Project-related impacts including through modelling using industry-standard techniques, and determination of appropriate mitigation measure and Project design.

Kinross respectfully requests that the wording (in italics) for the following requests for information be reviewed and revision be considered during finalization of the TISG, in recognition that the Impact Statement must address all requirements outlined in the Guidelines. Where the proponent is of the opinion that the information is not required, it should contact the Agency to confirm the rationale for not including it prior to submitting the Impact Statement.

- **Atmospheric, Acoustic and Visual Environment, Section 8.5.1 Baseline Conditions:**
 - Draft TISG Wording: *identify and address issues related to the quality of the monitoring data and seasonal variability in the baseline survey and determine ambient contaminant concentrations using complete, exhaustive, and representative monitoring data, collected over an appropriate duration and geographic scope; ...determine ambient contaminant concentrations using complete, exhaustive, and representative monitoring data, collected over an appropriate duration and geographic scope*
 - Rationale: exhaustive atmospheric, acoustic and visual data is not needed to be able to assess the potential impacts from the Project and develop appropriate mitigation measures if needed
 - Suggested Rewording: *identify and address issues related to the quality of the monitoring data and seasonal variability in the baseline survey and determine ambient contaminant concentrations using ~~complete, exhaustive, and~~ representative monitoring data, collected over an appropriate duration and geographic scope; ...determine ambient contaminant concentrations using ~~complete, exhaustive, and~~ representative monitoring data, collected over an appropriate duration and geographic scope*

- **Atmospheric, Acoustic and Visual Environment, Section 8.5.1 Baseline Conditions:**
 - Draft TISG Wording: *provide baseline ambient air concentrations for contaminant in the LSA, in particular near key receptors (e.g. communities, traditional land users, wildlife), ...provide current ambient noise levels at key receptor points around the Project (e.g. communities, traditional land users within or outside the property boundary, sensitive human receptors and wildlife):*
 - Rationale: Kinross agrees and has collected ambient sound levels during different season to reflect key receptors which could reasonably be affected by the Project; however, we respectfully suggest that in-community baseline sound measurements are not appropriate given that the Project is tens of kilometres away from the nearest communities and will need to meet Provincial noise requirements at much closer receptors.
 - Suggested Rewording: *provide baseline ambient air concentrations for contaminant in the LSA, in particular near key receptors (e.g. ~~communities, traditional land users, wildlife~~), ...provide current ambient noise levels at key receptor points around the Project (~~e.g. communities, traditional land users within or outside the property boundary, sensitive human receptors and wildlife~~)*

- **Health Conditions, Section 9.1 Baseline:**
 - Draft TISG Wording: *To understand the community context and baseline health profile for Indigenous Peoples, the Impact Statement must, ... provide the approximate location on a map and distance of likely human receptors, including foreseeable future receptors, which could be affected by changes in air, water, country food quality, and noise and light levels. Include the gathering, hunting, trapping and fishing areas used by Indigenous Peoples, as well as permanent and temporary residences of Indigenous Peoples (e.g. cottages and camps identified in collaboration with Indigenous Peoples) and any sensitive receptors near the Project;*
 - Rationale: Based on extensive discussions held to date, Kinross understands that local First Nations will not be willing to provide mapping of this information and Kinross requests that reference to mapping of this information be removed from the TISG.
 - Suggested Rewording: *To understand the community context and baseline health profile for Indigenous Peoples, the Impact Statement must, ... provide the approximate location on a map and distance of likely human receptors provide information available regarding potential human receptors, including foreseeable future receptors, which could be*

affected by changes in air, water, country food quality, and noise and light levels. Include the gathering, hunting, trapping and fishing areas used by Indigenous Peoples, as well as permanent and temporary residences of Indigenous Peoples (e.g. cottages and camps identified in collaboration with Indigenous Peoples) and any sensitive receptors near the Project as provided to Kinross by local Indigenous communities;

- **Indigenous Peoples, Section 12**

- Draft TISG Wording: *...The Impact Statement must indicate where input from Indigenous communities has been incorporated, including Indigenous Knowledge. To the extent possible, information should be specific to the individual Indigenous community(ies) involved in the assessment and describe contextual information about the members within an Indigenous community (e.g. women, men, Elders, and youth)...*
- Rationale: Based on discussions held to date, Kinross understands that some Indigenous communities may prefer to assess the Great Bear Project through Indigenous-led assessments. Kinross therefore requests the following additional wording to state that the Impact Statement will be developed with approved information.
- Suggested additional wording: *The Impact Statement will draw on available information approved for use by Indigenous communities in accordance with Indigenous communities' assessment preferences and protocols and with Section 6.1, Indigenous Knowledge considerations. This may include existing data and information, inputs from engagement, and sources of Indigenous Knowledge.*

- **Appendix 1 – Additional Guidance, Atmospheric, Acoustic and Visual Environment:**

- Draft TISG Wording: *baseline data should be taken from existing or new long-term monitoring with representative monitoring data, collected over an appropriate duration (~~multi-year~~) and geographic scope;*
- Rationale: TISG for other Ontario mining projects do not specify multi-year data collection, nor is multi-year data collection consistent with provincial regulatory requirements. As the Great Bear Project is a greenfield location without previous development, there are no significant annual fluctuations in baseline air quality expected. One year of sampling is considered adequate to characterize this aspect by our consultant experts and removal of the requirement for "multi-year" data collection is requested. A requirement for an additional year or more of data would be at a very high financial and schedule cost, and our experts do not believe would provide additional technical value.
- Suggested Rewording: *baseline data should be taken from existing or new long-term monitoring with representative monitoring data, collected over an appropriate duration (~~multi-year~~) and geographic scope*

- **Appendix 1 – Additional Guidance, Atmospheric, Acoustic and Visual Environment:**

- Draft TISG Wording: *The proponent should engage with experts at ECCC to inform the choice of program to conduct regional air quality modelling of acidifying deposition rates;*
- Rationale: Air emissions from the Project will be required to meet Ontario's stringent air emission criteria and ultra-low sulphur diesel fuel will be used. Accordingly, regional air quality modelling including for acidifying deposition is not proposed and the text is requested to be removed.
- Suggested Rewording: *The proponent should engage with experts at ECCC to inform the choice of program to conduct regional air quality modelling of acidifying deposition rates if modelling is warranted*

Clarifications regarding the Project

Kinross noted the following aspects during the review of the draft TISG which are being provided to IAAC for additional clarity:

- Section 6.2 Record of Engagement
 - The proponent should share engagement records with Indigenous communities...
 - Clarification: the agency is not requesting the full Record of Consultation (ROC) data file output to be shared, but rather key correspondence summaries?

 - The Proponent must include a description of how indigenous communities were provided a reasonable opportunity to review draft sections of the Impact Statement prior to them being filed, where disagreements occurred, and how disagreements were considered
 - Clarification: Please consider rewriting this bullet: *“The Proponent must include a description of where disagreements occurred, and how disagreements were considered with indigenous communities when sharing information related to the Impact Statement.”* Providing draft sections of the Impact Statement may not be Kinross’s preferred method of engagement, same comment to be applied to Section 1.3 4th paragraph of the Draft TISG’s.

- Section 8.6.1 (Groundwater and Surface Water) Baseline Conditions
 - Draft TISG Wording: *describe and illustrate on one or more topographic maps, at appropriate scales, ,... including the potential diversion of the Dixie Creek;*
 - Clarification: diversion of Dixie Creek is not proposed as clarified previously in the Detailed Project Description

- Section 8.9.2 Effects to Birds, Migratory Birds, and their Habitat
 - Draft TISG Wording: *The Impact Statement must: ,... describe the potential effects of the Project on birds,... including as a result of collision of birds (migratory and non-migratory) with project infrastructure, buildings, overhead lines, vehicles, railway operations, as a result of light attraction and from indirect effects, such as increased movement of predators or access to hunting;*
 - Clarification: the Great Bear Project does not include any railway operations.

- **Human Health, Section 9; Social Conditions, Section 10; Economic Conditions, Section 11**
 - In section 9 of Draft TISG states *“The Impact Statement must describe the existing social conditions for Indigenous communities and the Red Lake/Ear Falls Indigenous population in general”* and in Section 10 it states *“The Impact Statement must describe the current state of physical, mental and social well-being and incorporate a determinants of health approach to move beyond biophysical health considerations to assess the impacts on Indigenous Peoples”*. Section 11 also starts with *“The Impact Statement must describe the local and regional economic conditions and trends, including for Indigenous communities and the Red Lake/Ear Falls Indigenous population in general...”*.
 - Question: There is no mention of describing existing conditions or assessing effects for non-Indigenous communities. Can the Agency confirm that this is correct?

- **Sections 9 (Health Conditions), 10 (Social Conditions) and 11(Economic Conditions) and 12.3 (Health, social and economic conditions of Indigenous Peoples)**

- There appears to be overlap between Sections 9 (Health Conditions), 10 (Social Conditions) and 11(Economic Conditions) and 12.3 (Health, social and economic conditions of Indigenous Peoples). The draft TISG for these sections state that the focus of Sections 9, 10, and 11 are Indigenous communities and Indigenous Peoples residing in Red Lake and Ear Falls.
- Request: Kinross asks that section 12.3 be removed from the Tailored Impact Statement Guidelines.
- **Section 12.4.2 (Rights of Indigenous Peoples) Impacts on Rights of Indigenous Peoples**
 - Draft TISG Wording: *In some instances, the proponent may adopt Indigenous-led assessment of impacts on rights and include them directly in the Impact Statement.*
 - Clarification: Kinross’s engagement with Indigenous communities suggests that they may choose to assess effects on Indigenous physical and cultural heritage (section 12.1), current use of lands and resources for traditional purposes (section 12.2), and health, social, and economic conditions of Indigenous peoples (section 12.3). Kinross requests Indigenous-led assessment provisions also be stated in sections 12.1, 12.2, and 12.3.
 - Question: Does IAAC have further information that can be shared with Kinross on the scopes and assessment preferences that Indigenous communities have planned for the Great Bear Impact Assessment?

Closing

Kinross would like to thank IAAC for the opportunity to provide the preceding comments on the Draft TISG, and we look forward to working with you throughout the Impact Assessment process to advance the Great Bear Project for the benefit of northwestern Ontario.

Sincerely,

Aaron MacDonell

<Signature removed>

Director, Environmental Services, Great Bear Resources

Kinross Gold Corporation