

## 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](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.

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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.

ECCC recommends the following edits (in bold and strikethrough text) to section 3.4 Authorization under subsection 73(1) of the *Species at Risk Act* for clarity:

“Notably, a permit may be required under section 73(1) of SARA **for a migratory bird also listed under Schedule 1 of SARA that has a nest or roost in the project area. Residences (nests and roosts) of some SARA listed migratory birds are protected year-round under SARA wherever they occur (e.g., Chimney Swift or Red-headed Woodpecker).** ~~if the Project may damage or destroy the residence of a migratory bird species protected under the *Migratory Birds Convention Act*, if the residence description under the SARA defines the residence as protected when unoccupied.”~~

ECCC recommends the following edits (in bold text) to section 4.4.1. Description for clarity:

“Permits are required by those persons conducting activities affecting **wildlife** species listed on Schedule 1 of SARA as extirpated, endangered, or threatened and which contravene SARA’s prohibitions where they are in force.”

ECCC recommends the following edits (in bold and strikethrough text) to section 4.4.1.1. General prohibitions for clarity:

**“Prohibitions may apply on lands other than federal lands pursuant to other orders or regulations under SARA.** ~~Under sections 34 and 80 of SARA, prohibitions relative to individuals and residences may apply on lands other than federal lands for species that are not aquatic species or migratory birds protected under the *Migratory Birds Convention Act, 1994* under an Order in Council.~~

It is possible that such prohibitions may come into force in the future through orders in Council for individuals, residences and critical habitat on non-federal lands and/or through ministerial order for critical habitat on federal lands. It is also possible that, over the course of the assessment or after the assessment, additional species could be listed under SARA; permits may be required for project activities that affect these additional species. Proponents are advised to monitor for such developments on the SARA Registry <https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry.html>.”

ECCC recommends including the language (in bold and strikethrough text) from the Permitting Plan for the Northern Road Link Project into section 4.4.1.4. Responsibilities for clarity:

**“Responsibility for implementing SARA lies with the Ministers responsible for Environment and Climate Change Canada (ECCC), Parks Canada Agency (PCA), and DFO.**

- **DFO is responsible for considering permit applications with respect to aquatic species (as defined by SARA), other than individuals of species in the waters situated on federal lands administered by the PCA.**
- **PCA is responsible for considering permit applications with respect to individuals in or on federal lands administered by PCA, including aquatic species (as defined by SARA) as well as terrestrial species.**
- **ECCC is responsible for issuing permits for all listed species not described above.** ~~all species at risk listed on Schedule 1 of SARA, except for those occurring on lands administered by Parks Canada Agency and for aquatic species, as defined by the *Fisheries Act*. This includes all terrestrial species on federal land and any land affected by a protection order issued under SARA, and for migratory birds wherever they are found.”~~

ECCC recommends the following edits (in bold text) to section 4.4.2. Regulatory process for consistency and clarity:

“Proponents must submit an application to **the DFO, ECCC or PCA Regional office** in a manner and form satisfactory to the organization.”

ECCC recommends the following edits (in bold text) to section 4.4.2.2. Application analysis and consultation for clarity and consistency:

“An analysis of the application is conducted by ECCC, **DFO or PCA** upon receipt of the application, although there may be occasions when the competent minister will require additional information. A focus of the analysis is on how the application meets the pre-conditions listed under subsection 73(3) **of SARA**. Authorizations may be issued only if the competent minister is of the opinion that all three of the following pre-conditions are met:”

ECCC recommends the following updates or additions (in bold text) to section 4.4.3. References:

- Update the following link:

Permitting for terrestrial species at risk under SARA

<https://slep-saraps.az.ec.gc.ca/>

- Add the following two references for migratory bird species at risk:

**Protection statement for the habitat to which the *Migratory Birds Convention Act, 1994* applies for migratory birds listed under the *Species at Risk Act***

<https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry/critical-habitat-statements/protection-statement-habitat-mbca-1994-applies-migratory-birds-listed-under-sara.html>

**Residence Descriptions**

<https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry/residence-descriptions.html>

ECCC recommends the following SARA-related additions (in bold text) to section 7. Summary Table – Anticipated Regulatory Activities:

- Add **SARA – Proponent** to the Planning and Impact Statement Phases for the “Information gathering and engagement with the public and Indigenous communities” activity.
- Add **SARA – ECCC** to the Decision Phase for the “Analysis of information and application” and “Public and Indigenous Consultation” activities.

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.

Environment and Climate Change Canada has not identified any power that it will be unable to exercise to 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.
ECCC-01	3.4. Project components and activities  Page 11	Including a description of the anticipated location of hazardous material storage is crucial for assessing the potential impacts of a release and is needed to inform mitigation measures to minimize impacts.	ECCC recommends the following addition to the eighth bullet of the Project activities within section 3.4 (new text in bold):  “storage, gestation, disposal and management of hazardous materials, fuels and waste (indicate types, methods, <b>proposed locations</b> and amounts);”
ECCC-02	8.5.1. Baseline conditions  Page 45	The Guidelines state that “if modelling is undertaken to understand baseline ambient air quality, then describe direct and indirect sources	ECCC recommends the following revision to this bullet (new text in bold):  “if modelling is undertaken to understand baseline ambient air quality, then describe direct and indirect sources of baseline air emissions, including mobile, stationary and fugitive, and provide an inventory, within the care and control of the proponent, of all <del>equipment</del> <b>machines that are</b> sources of baseline air emissions;”

<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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		<p>of baseline air emissions, including mobile, stationary and fugitive, and provide an inventory, within the care and control of the proponent, of all equipment sources of baseline air emissions;”</p> <p>The word “equipment” should be replaced with “machines that are” (if it is intended to refer to vehicles or engines) to align with the <i>Off-Road Compression-Ignition (Mobile and Stationary) and Large Spark-Ignition Engine Emission Regulations</i>.</p>	
ECCC-03	8.5.2. Effects to the atmospheric, acoustic, and visual environment  Page 46	The Guidelines state that “for all applicable emission sources, include the assumed tier of emission standard for each emission factor applied;”	ECCC recommends the following deletion under section 8.5.2 (in strikethrough):  <del>“for all applicable emission sources, include the assumed tier of emission standard for each emission factor applied;”</del>

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		<p>As worded, this may cause confusion because emission standards are not dependent on emission factors, since one relates to emission limits for a machine and the other relates to emissions produced by the consumption of a fuel.</p> <p>Requirements related to emission standards are stated in the following bullet, so this preceding bullet could be removed entirely to avoid redundancy.</p>	
ECCC-04	<p>8.5.2. Effects to the atmospheric, acoustic, and visual environment</p> <p>Page 46</p>	<p>The Guidelines state “provide details of the achievement of emission standards for all mobile and stationary engines used in the Project;”</p> <p>The word “engines” should be replaced</p>	<p>ECCC recommends the following revision to this bullet (new text in bold):</p> <p>“<del>provide details of the achievement of emission standards for all</del> <b>list</b> emission standards for <b>each</b> mobile and stationary <del>engines</del> <b>machine</b> used in the Project;”</p>

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.
		<p>with the word “machines” to align with the <i>Off-Road Compression-Ignition (Mobile and Stationary) and Large Spark-Ignition Engine Emission Regulations</i>.</p> <p>The meaning of the phrase “provide details of the achievement of emission standards” is not clear to ECCC.</p>	
ECCC-05	<p>8.5.2 Effects to the atmospheric, acoustic, and visual environment</p> <p>Page 48, last paragraph</p>	<p>The Guidelines recommend that “the proponent consult with the Ontario Ministry of Environment, Conservation and Parks prior to initiating ambient air quality monitoring as described in the Operations manual for air quality monitoring in Ontario, to support the development of a monitoring plan.”</p>	<p>ECCC recommends that the last paragraph on page 48 be revised as follows (new text in bold):</p> <p>“It is recommended that the proponent consult with <b>Environment and Climate Change Canada and the Ontario Ministry of Environment, Conservation and Parks</b> prior to initiating ambient air quality monitoring as described in the <a href="#">CCME Ambient Air Monitoring and Quality Assurance/Quality Control Guidelines</a> and the <a href="#">Operations manual for air quality monitoring in Ontario</a>, to support the development of a monitoring plan.”</p>

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.
		To ensure federal ambient air quality monitoring guidance is also considered by the proponent, reference to the Canadian Council of Ministers of the Environment’s (CCME) Ambient Air Monitoring and Quality Assurance/Quality Control Guidelines should also be included in this paragraph.	
ECCC-06	8.7.1 Baseline conditions  Page 59	The list of wetland classes provided in the Guidelines includes only three of the five classes of wetlands recognized by the National Wetlands Working Group.	ECCC recommends the following revision to the fifth main bullet (new text in bold):  “use the <a href="#">Ontario Land Cover Compilation v.2.0</a> to quantify, describe and map wetlands (e.g. <b>shallow open waters, swamps</b> , fens, marshes, <del>peat lands</del> , bogs) within the LSA and RSA potentially affected by the project, in the context of:”
ECCC-07	8.7.2 Effects to vegetation, riparian and wetland environments  Page 60	Add additional detail regarding the scale (i.e., local to regional to global), type and rank. Use provincial ranking (SRank) codes used by Ontario’s	ECCC recommends the following revisions under the second bullet (new text in bold):  “the <b>scale, type, rank and</b> availability of rare habitat; and”



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		<p>Natural Heritage Information Centre (NHIC) (i.e., S1 (extremely rare) or S3 (rare to uncommon), or GRank for those that are rare globally) that indicate significance of rare habitat.</p> <p>This additional detail would provide more information regarding the significance of the level of potential disturbance.</p>	
ECCC-08	<p>8.9.1 Baseline conditions</p> <p>Page 69</p>	<p>Given the occurrence of Red-necked Phalarope and Lesser Yellowlegs (both shorebirds) in the region, it may be prudent to also retain the general “shorebirds” grouping to ensure a more fulsome assessment of potential effects from the proposed Project.</p>	<p>ECCC recommends an additional sub-bullet for inclusion under the second main bullet (new text in bold):</p> <p><b>“shorebirds, such as sandpipers, plovers and snipes;</b>  forest birds, such as warblers, vireos and thrushes;  other land birds, such as, owls, swallows, kingfishers;”</p>

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.
ECCC-09	8.9.1 Baseline conditions  Page 69	ECCC has identified the need for a minor correction to Lesser Yellowlegs and does not agree with the omission of Red-necked Phalarope from the list of migratory bird species at risk. Red-necked phalarope is a regularly occurring species in the region during spring and fall migration (late summer) periods. Availability of migration stopover habitat is an important factor in species populations and recovery. Red-necked Phalarope is also protected under the <i>Migratory Birds Convention Act, 1994</i> (MBCA).	ECCC recommends the following revision under the second main bullet (new text in bold):  “each migratory bird species at risk as an individual VC, including Barn Swallow, Bank Swallow, Eastern Whip-poor-will, Common Nighthawk, Canada Warbler, Eastern Wood-Pewee, Evening Grosbeak, Olive-Sided Flycatcher, Lesser <b>Yellowlegs</b> , Yellow Rail and <b>Red-necked Phalarope</b> (see also section 8.11 Species at Risk and their habitat);”
ECCC-10	8.11 Species at Risk and their habitat  Page 76	Correction of typographical error.	ECCC recommends the following addition to the third paragraph (new text in bold):  “Specifically, the Impact Statement must consider each of the following species at <b>risk</b> :”

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.
ECCC-11	8.11 Species at Risk and their habitat  Page 77	<p>Section 8.11 states that “[t]he Impact Statement must identify species at risk listed on Schedule 1 of SARA, if the species or its critical habitat are likely to be in the project area or study areas.</p> <p>ECCC recommends inclusion of Red-necked Phalarope, a regularly occurring, species in the region during spring and fall migration (late summer) periods.</p> <p>Correction of typographical error (“yellowlegs” not “yellow-legs”).</p>	<p>ECCC recommends the following revision to the first two bullets (new text in bold):</p> <p>“eastern wood-pewee, common nighthawk, olive-sided flycatcher, evening grosbeak, rusty blackbird, short-eared owl, yellow rail and <b>red-necked phalarope</b> (special concern); lesser <b>yellowlegs</b> (not listed, and assessed by COSEWIC as threatened).”</p>
ECCC-12	8.11.1 Baseline conditions  Page 79	ECCC recommends including a map of General Habitat categories within the RSA as well, to illustrate current availability and distribution of habitat	<p>ECCC recommends the following revision to the sixth bullet (new text in bold):</p> <p>“include a map of General Habitat categories throughout the LSA <b>and RSA</b> using Ontario’s General Habitat Description for the Forest-Dwelling Caribou and identify permanent alterations;”</p>

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.
		throughout the Sydney Range (RSA) relative to the project site and LSA.	
ECCC-13	8.11.1 Baseline conditions  Page 79	<p>ECCC recommends describing any existing connectivity between ranges, in addition to within the range.</p> <p>The provincial Integrated Range Assessment for Sydney Range indicates that the east side of the Sydney Range, where the project is located, has habitat recovery potential that is important to the provision of long-term connectivity to Trout Lake Forest and Churchill Range.</p>	<p>ECCC recommends the following revision to the seventh bullet (new text in bold):</p> <p>“describe the current state of connectivity of boreal caribou habitat, within the range, <b>and between ranges</b>, including the corridors between important habitat features, as determined appropriate through technical discussions with the Agency and its federal expert advisors prior to submitting the Impact Statement, and the projection of boreal caribou habitat connectivity in the absence of the Project over the course of all project phases; and”</p>
ECCC-14	8.11.2 Effects to the species and their habitat  Page 80	Correction of typographical error.	<p>ECCC recommends the following revision to the first bullet (new text in bold):</p> <p>“<b>describe</b> key indicators used to assess project effects and the sensitivity of species at risk to disturbance. Provide a rationale for their selection, including a clear connection to the indicators used to characterize baseline conditions;”</p>

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.
ECCC-15	8.11.2 Effects to the species and their habitat  Page 80	ECCC recommends including information on linkages between effects to species at risk in the context of federal and non-federal lands.	ECCC recommends the following addition after the first bullet (new text in bold):  “ <b>clearly identify the locations of federal and non-federal lands within the study areas and differentiate between them in the presentation of information regarding species at risk;</b> ”
ECCC-16	8.11.2 Effects to the species and their habitat  Page 80	ECCC recommends specifying an assessment of connectivity between ranges, in addition to within the range.  The provincial Integrated Range Assessment for Sydney Range indicates that the east side of the Sydney Range, where the project is located, has habitat recovery potential that is important to the provision of long-term connectivity to Trout Lake Forest and Churchill Range.	ECCC recommends the following revision to the ninth main bullet (new text in bold):  “determine whether the Project is expected to result in a reduction of connectivity within the range <b>and/or between ranges</b> , and provide a rationale for the conclusion;”
ECCC-17	8.11.3 Mitigation and enhancement measures	Edit to update reference to current publication.	ECCC recommends the following revision to the third sub-bullet of the first main bullet (new text in bold):

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	Page 82		“avoid destruction of biophysical attributes <del>(see Appendix H in the Woodland Caribou, Boreal population (Rangifer tarandus caribou): amended recovery strategy [proposed] 2019)</del> <b>(see Appendix H of the Amended Recovery Strategy for the Woodland Caribou (Rangifer tarandus caribou), Boreal Population, in Canada 2020);”</b>
ECCC-18	8.12.1. GHG emissions  Page 83	Replace the word ‘credits’ with ‘measures’ to reflect the updated equation as found in section 2.1 of the Technical Guide.	ECCC recommends the following revision to the third bullet of section 8.12.1 (new text in bold):  “each term of Equation 1 of the Technical Guide (Net GHG emissions = Direct GHG emissions + Acquired energy GHG emissions - Avoided domestic GHG emissions - Offset <del>credits</del> <b>measures</b> ), per year for each phase of the Project (additional guidance is provided in section 2.1 of the Technical Guide);”
ECCC-19	8.12.1 GHG emissions  Page 83	As similarly worded under the third and fourth bullets, specify that the equation comes from the Technical Guide instead of the SACC, as there are differences between the two documents, and the Technical Guide is the most current.	ECCC recommends the following revision to the fifth bullet of section 8.12.1 (new text in bold):  “the quantity and a description of the “units produced” used in Equation 4 <b>of the Technical Guide</b> for each year of the operation phase of the Project (additional guidance is provided in section 2.1.5 of the Technical Guide);”
ECCC-20	8.12.1 GHG emissions  Page 83	The reference to section 2.1.5 of the Technical Guide needs to be corrected.	ECCC recommends the following correction to the sixth bullet under section 8.12.1 (in strikethrough):  “methodology, data, emission factors, and assumptions used to quantify each element of the net GHG emissions (refer to section 3.1.1 of the SACC and section <del>2.1.5</del> of the Technical Guide);”
ECCC-21	8.12.1 GHG emissions  Page 83	There is currently insufficient information on the project’s potential fuel	ECCC recommends the following addition under section 8.12.1 (new text in bold):  “ <b>an upstream greenhouse gas emissions assessment, required only if the Project has the potential to result in upstream GHG emissions greater than or equal to the thresholds outlined</b>

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		<p>consumption to determine whether the project will be required to conduct an upstream greenhouse gas emissions assessment.</p> <p>ECCC has yet to review a mining project that has met the current threshold for an upstream greenhouse gas emissions assessment, so the likelihood that one would be required for this project is quite low.</p> <p>In the absence of information needed to make a determination at this time, including a section in the Guidelines requiring the proponent to verify whether an upstream greenhouse gas emissions assessment is needed would reflect a more</p>	<p><b>in Table 1 in Section 3.2.2 of the SACC, as described in section 3.2 and 5.2 of the SACC. Additional guidance is provided in section 5 of the Technical Guide.”</b></p>

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		conservative approach.	
ECCC-22	8.12.3 Impact of the project on federal emissions reduction efforts and on global GHG emissions  Page 84	As the Project will be generating GHG emissions, these sentences are applicable to the Project.	ECCC recommends the deletion of ‘if applicable’ in the first and second bullets (in strikethrough):  “how the Project may impact Canada’s efforts to reduce GHG emissions, <del>if applicable</del> ,”  “how the Project could impact global GHG emissions, <del>if applicable</del> ; and”
ECCC-23	13.3 Emergency management  Page 116	ECCC recommends the inclusion of external parties (as indicated in bold in the recommendation) to ensure the proponent provides a more complete picture of preparedness and response measures in the event of an accident or malfunction.	ECCC recommends the following addition to the sixth bullet (new text in bold):  “describe the role of the proponent <b>or external parties (e.g., contractor, mutual aid agreement)</b> in the case of spill, collision, grounding or other accidents or malfunctions associated with the Project;”
ECCC-24	Appendix 1 – Additional Guidance	ECCC recommends including additional sources of information.	ECCC recommends the following additions to the third bullet:  <a href="#">Natural Heritage Information Centre</a> <a href="#">Make a natural heritage area map</a> <a href="#">Ontario GeoHub</a> <a href="#">Wildtrax</a>



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	Sources of baseline information  Page 125		<a href="#">The Third Ontario Breeding Bird Atlas</a>
ECCC-25	Appendix 1 – Additional Guidance  Guidance for Biophysical Components  Wetlands  Page 133	Correction of typographical error and text suggestions for improved clarity.	ECCC recommends the following revision to the second sub-bullet of the third main bullet (in strikethrough and new text in bold):  “ <del>plan</del> -survey protocol <b>planning</b> for representative wetlands <b>should</b> <del>to</del> include <b>development of statistical models</b> <del>modelling</del> and <b>use of</b> simulations to estimate sampling requirements, and <del>analysis</del> <b>analyses</b> to evaluate resulting design options. Sample size must be planned to support evaluation of the project area within the context of the LSA and RSA. Appropriate design of surveys will need to consider multiple survey locations in order to represent the wetland heterogeneity of the RSA, and to yield multiple survey locations per wetland type, without requiring aggregation of habitat classes post-hoc.”
ECCC-26	Appendix 1 – Additional Guidance  Guidance for biophysical components  Birds and bird habitat  Page 137	Collapsed metrics of avian biodiversity are of limited use in characterizing baseline conditions, in part because species vary widely in their ecology and conservation status; rather, species level information is needed.	ECCC recommends the following revision to the second main bullet and its two sub-bullets (in strikethrough and new text in bold):  “ <del>when selecting metrics to characterize avifauna biodiversity, it is recommended that:</del>  <del>biodiversity</del> -metrics <b>for individual species</b> should include the following: distribution in space, frequency of occurrence, occurrence and abundance trends in time, abundance and density, as well as the types of associated habitats and the strength of the associations; <del>and</del>  <b>analyses and descriptions of baseline conditions for bird species</b> <del>species communities should not be grouped together by diversity indicator and</del> should not be limited to the indicator species. The identification of species, distribution, abundance and, when possible, estimates of species’ breeding status should be the main quantification objectives. <b>Collapsing assessments into proxy (equivalent to focal or indicator) species is likely to lead to inaccurate estimates of project impacts when a project is expected to impact many bird species. The use of proxy species is likely to lead to unreliable conclusions since the assumption of equal impacts to all species within groups may be unfounded;</b> ”

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ECCC-27	Appendix 1 – Additional Guidance  Guidance for biophysical components  Birds and bird habitat  Page 137	Clear descriptions of protocols are important for assessing data value and integrity.  The recommended phrase is also included in the final Guidelines for Crawford Nickel.	ECCC recommends the following main bullet be added after the first main bullet (new text in bold):  <b>“describe the protocols used to conduct surveys using point counts, Autonomous Recording Units (ARUs), and aerial survey methods and provide rationale for why the selected protocols are best suited for the project;”</b>
ECCC-28	Appendix 1 – Additional Guidance  Guidance for biophysical components  Wildlife and species at risk  Pages 139-140	Correction of typographical error and minor edits for consistency.	ECCC recommends the following revision to the last sub-bullet (new text in bold):  “plan the sample size <b>and survey design</b> to ensure sufficient assessment of the project area in the context of the LSA and RSA. Survey design will need to represent the heterogeneity of RSA habitat and to plan the number of sites by land cover or by habitat class so that aggregation of post hoc habitat classes is not necessary;  design sampling effort per unit area - field survey effort to be most intensive within the project area. The level of effort per unit area may be similar or somewhat less within the remainder of the LSA, but should be scaled to the likelihood that project effects will <del>effect</del> <b>affect wildlife and species at risk</b> within that zone. Efforts outside the project <del>study</del> area should be carefully designed to ensure that estimates comparing within and across the project area, LSA, and RSA are unbiased and as precise as possible;”
ECCC-29	Appendix 1 – Additional Guidance  Guidance for biophysical components	Modified the baseline study requirements specific to boreal caribou to remain consistent with recent TISGs (i.e., Marten Falls and Crawford Nickel), and included	ECCC recommends the following revision to the bullets specific to boreal caribou (in strikethrough and new text in bold):  “With respect to boreal caribou, the proponent should:  provide documentation and digital files for all results of analyses that allow for a clear understanding of the methods and a replication of the results (raw scripts or workflows are preferred in place of descriptive documentation);

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.
	Wildlife and species at risk  Pages 140-141	an additional source of information.	<p>provide the best available information from the relevant jurisdiction concerning baseline range population size and trend; consult with experts of the relevant jurisdiction on appropriate survey methodologies for boreal caribou. Provide a justification for the selected methodologies as compared to other options; <b>provide estimates of confidence or error for all estimates of abundance and distribution. Estimates should be defined (e.g. mean across years, mean across sites, modeled prediction) and, if appropriate, confidence or other intervals should be defined (e.g. 95% confidence intervals, credible intervals);</b> in designing surveys for boreal caribou, the following information sources should be consulted: <del>provide estimates of confidence or error for all estimates of abundance and distribution. Estimates should be defined (e.g. mean across years, mean across sites, modeled prediction) and, if appropriate, confidence or other intervals should be defined (e.g. 95% confidence intervals, credible intervals);</del> Integrated Assessment Protocol for Woodland Caribou Ranges in Ontario (IAP) (request from Ontario Ministry of Environment, Conservation and Parks); General Habitat Description for the forest-dwelling Woodland Caribou (<i>Rangifer tarandus caribou</i>) (GHD); Ontario’s Woodland Caribou Conservation Plan (CCP); Range Management Policy in Support of Woodland Caribou Conservation and Recovery (RMP); <b>Integrated Range Assessment for Woodland Caribou and their Habitat: Sydney Range 2012; and</b> Indigenous knowledge holders from across all of the potentially impacted Indigenous groups identified by the Agency.”</p>
ECCC-30	Appendix 2 – Resources and Guidance  Species at Risk  Page 152	ECCC recommends the inclusion of references to the Integrated Range Plans for the Sydney, Churchill and Barren Ranges to assist the proponent in determining	<p>ECCC recommends the following references for inclusion:</p> <p>Integrated Range Assessment for Woodland Caribou and their Habitat. Sydney Range 2012. December 2014. Available at: <a href="https://files.ontario.ca/environment-and-energy/species-at-risk/Sydney-Range-EN.pdf">https://files.ontario.ca/environment-and-energy/species-at-risk/Sydney-Range-EN.pdf</a></p>

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		whether the project is expected to result in a reduction of connectivity within the range and/or between ranges.	<p>Integrated Range Assessment for Woodland Caribou and their Habitat. Churchill Range 2012. December 2014. Available at: <a href="https://files.ontario.ca/environment-and-energy/species-at-risk/Churchill-Range-EN.pdf">https://files.ontario.ca/environment-and-energy/species-at-risk/Churchill-Range-EN.pdf</a></p> <p>Integrated Range Assessment for Woodland Caribou and their Habitat. Berens Range 2012. December 2014. Available at: <a href="https://files.ontario.ca/environment-and-energy/species-at-risk/Berens-Range-EN.pdf">https://files.ontario.ca/environment-and-energy/species-at-risk/Berens-Range-EN.pdf</a></p>