

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. 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:	Ministry of Environment Conservation and Parks		
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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 Description¹ and Response to the Summary of Issues², 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.
MECP-SARB-01	8.11	<p>Critical Habitat</p> <p>It may be helpful to define the federal understanding of "critical habitat" for the proponent as Ontario has the GHD which, in the case of Caribou, describes Category 1 habitat (winter and nursery) as being the least tolerant of change.</p>	

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

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

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		<p>With Wolverine MECP's SARB views the den site and the area within 8 km of the den site as sensitive habitat.</p> <p>SAR bats - sensitive habitat is considered to be maternal roost sites (when in use) and hibernacula.</p> <p>SAR birds - nest and defended territory as Category 1.</p>	
MECP-SARB-02	8.11	<p>Suggest the SAR list include the following species:</p> <ul style="list-style-type: none"> • Added to the SARO list as <i>Endangered</i> in 2024: <ul style="list-style-type: none"> ○ Red-headed Woodpecker • Recently assessed as <i>Endangered</i> by COSSARO to be added to the SARO list in January 2025: <ul style="list-style-type: none"> ○ Silver-haired Bat ○ Eastern Red Bat ○ Hoary Bat 	<p>Page 76</p> <ul style="list-style-type: none"> • little brown myotis, northern myotis, tri-colored bat, hoary bat, silver-haired bat and eastern red bat and red-headed woodpecker (endangered);
MECP-SARB-03	8.11.1	Rather than specify only boreal caribou and wolverine SARB recommends that the Impact Statement require baseline conditions for all species federally listed as endangered or threatened.	<p>Page 77</p> <p><i>“The Impact Statement must, for all SARA endangered and threatened species that could be expected to be found at or near the project site:”</i></p>
MECP-SARB-04	8.11.1	Regarding the map product to display survey sites, species sighting records etc. should this indicate that the expectation is that data from all data sources should be displayed not just that collected during the project baseline data collection?	<p>Page 77 – bullet 4</p> <p><i>“provide a map showing survey sites, species sighting records, the areas of highest concentration or areas of use from all available data sources;”</i></p>
MECP-SARB-05	8.11.1	If it helps Ontario considers the LSA to be the area within 10 km of the project property. In this case it would be a 10 km radius around the current and proposed mining lease land.	<p>Page 78 – bullet 3 under <i>“With respect to boreal caribou and its habitat.....”</i></p>
MECP-SARB-06	8.11.2	Same as comment MECP_SARB_03 above, should this not pertain to all federally END or THR species?	<p>Page 79</p> <p><i>“The Impact Statement must, for all SARA endangered and threatened species that could be expected to be found at or near the project site:”</i></p>

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		<p>Suggest that a number of the bulleted items under “<i>With respect to boreal caribou, the Impact Statement must additionally:</i>” would pertain to Wolverine as well as all endangered or threatened species.</p> <p>For example, “any sensory disturbance (e.g. noise, vibration, light) or sources of collision that could affect individuals of the species, if they are present, and assess if these could lead to avoidance of habitat”. It is expected that these activities will also impact other species such as SAR bats.</p>	<p>Recommend that all bullets in 8.11.2 apply to all SAR.</p>
MECP-SARB-06	Appendix 1	<p>Suggest adding Ontario’s Natural Heritage Information Centre to the list of baseline information and/or the Appendix 2 Species at Risk section.</p>	<p>Ontario's Natural Heritage Information Centre https://www.ontario.ca/page/natural-heritage-information-centre</p>
MECP-SARB-07	Appendix 1	<p><i>“land cover data, such as forest cover maps, or remote sensing data for important habitats features and important characteristics;”</i></p> <p>Recommend adding “provincial forest resource inventories” to the list.</p>	<p>Page 125 – bullet 4</p> <p><i>“land cover data, such as forest cover maps, provincial forest resource inventories or remote sensing data for important habitats features and important characteristics;”</i></p>
MECP-SARB-08	Appendix 2	<p>Species at Risk</p> <p>Recommend the addition of the following links:</p> <p>https://www.ontario.ca/page/wolverine</p> <p>https://www.ontario.ca/page/wolverine-government-response-statement</p> <p>https://www.ontario.ca/page/natural-heritage-information-centr</p> <p>https://www.ontario.ca/laws/regulation/r22024 (updates to the SARO list to accompany O. Reg. 230/08)</p>	

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.

