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Kinross Great Bear Impact Statement

**Re: Impact Statement Response: Socio-Economic, Infrastructure and
Regional Capacity Considerations - Great Bear Gold Project**

The Great Bear Gold Project Impact Statement presents a comprehensive overview of the proposed project, including anticipated economic benefits, environmental mitigation measures, Indigenous engagement activities, and community investment initiatives. The document clearly demonstrates significant effort toward consultation, environmental baseline work, and incorporation of Indigenous knowledge into the assessment process.

However, while the Impact Statement provides substantial technical details regarding the mine footprint and environmental mitigation measures, many of the most significant operational, social, and reputational risks associated with the Project are likely to emerge not from the direct mine footprint itself, but rather from broader regional and cumulative socio-economic pressures.

These include:

- Regional labour competition
- Housing availability and affordability
- Community expectations regarding benefits
- Municipal infrastructure and service strain
- Long-term relationship management with Indigenous Nations and local governments

The current impact statement appears to lack substantive proactive risk mitigation planning detail in regard to what is proposed as the Project advances through the construction and operations phases.

Regional Labour Competition and Workforce Pressures

The Impact Statement recognizes that mining already represents a major regional employer and acknowledges that workforce competition and labour market constraints are anticipated throughout both construction and operations.

The Statement indicates substantial employment opportunities over its lifecycle, including more than 113,130 person-years of total employment and 85,720 person years of local employment. This equates to a proposed 76% local employment for the project.

However, the regional labour pool in northwestern Ontario is limited, and municipalities, service providers, and stakeholders have already identified workforce attraction and retention as key concerns during consultation activities.

As a result, the following impacts should be considered and mitigated in the Impact Study:

- Increased competition for skilled trades, operators, maintenance personnel, technical professionals, contractors, healthcare workers, and support staff
- Wage escalation pressure across the region
- Staffing shortages within existing local businesses, municipalities, healthcare systems, and service providers exacerbated as workers transfer to higher wage employment, creating significant pressure on local businesses services within residential settings and Government / Municipality staffing and retention
- Greater pressure on Indigenous workforce development and training programs to meet labour demand

The Impact Statement references training, apprenticeship, scholarship, and Indigenous workforce development initiatives. The document contains limited assessments of cumulative labour market effects with other regional mining developments and at best conceptual information on mitigation planning whilst remaining silent on negative secondary impacts to local service provision.

Workforce competition may become one of the Project's most material long-term risks noting current regional labour availability already can't meet demand.

Housing Availability and Community Capacity

Housing pressure is appropriately identified within the Impact Statement as a major concern raised by municipalities and stakeholders.

The document acknowledges that:

- Local housing supply is limited
- Workforce influx may strain existing rental markets
- Temporary and rotational workforces are anticipated
- A 1,000-person temporary construction camp is proposed as a mitigation measure

While camp accommodation will reduce some direct pressure on local housing markets, the assessment appears to understate the secondary housing impacts associated with the projects projected local employment demand, based on the assessments own documented projected employment figures:

- Permanent employee relocation
- Contractor and subcontractor accommodation demand
- Spillover demand into Red Lake, Ear Falls, and surrounding communities
- Cumulative housing effects from multiple regional mining projects

The Impact Statement also contains limited analysis regarding:

- Housing affordability impacts
- Availability of family housing
- Long-term residential growth planning
- Potential displacement pressures on existing residents

These issues have the potential to create significant social and reputational pressures if not managed in partnership with municipalities and regional stakeholders.

The Impact Statement indicates ‘worker housing’ as a social benefit but is silent on actions to facilitate an increase in available worker housing.

Local Suppliers, Procurement and Regional Business Capacity

The Impact Statement places strong emphasis on local and Indigenous procurement, supplier participation, and economic inclusion.

The Project is expected to generate:

- Increased demand for regional services
- Contractor growth opportunities
- Expansion of Indigenous-owned businesses
- Broader regional economic stimulation

This represents a significant positive opportunity for the region. However, the assessment indirectly acknowledges that existing local suppliers may face challenges scaling to meet project demand.

Potential risks include:

- Limited supplier capacity
- Competition for skilled labour affecting existing businesses
- Inflationary pressure on local services and contractors
- Supply chain bottlenecks during peak construction periods

The success of procurement commitments will likely be measured not only by spending totals, but by demonstrable long term Indigenous and local business participation outcomes.

As community expectations continue to evolve, maintaining transparency regarding procurement performance and benefit sharing outcomes will remain critical to maintaining social license.

Community Benefits and Regional Investment Expectations

The Impact Statement outlines several meaningful yet uncOSTed community benefit initiatives and partnership programs, including:

- Indigenous training and employment initiatives
- Healthcare funding contributions
- Educational partnerships and scholarships
- Watershed monitoring initiatives
- Wild Rice revitalization projects
- Trout rehabilitation programs
- Community sponsorships and donations

Notably, the Project includes:

- A once off \$200,000 healthcare contribution already undertaken
- Participation in regional healthcare recruitment initiatives
- The Chukuni Watershed Aquatic Monitoring Program
- Wild Rice enhancement initiatives with Wabauskang First Nation
- Red Lake Trout Recovery partnerships

These initiatives represent positive commitments and demonstrate responsiveness to Indigenous and community concerns.

However, stakeholder expectations surrounding long term community benefit contributions to substantive community infrastructure that help offset negative Project impacts are likely to increase substantially as the Project progresses. A defined, meaningful contribution to desired local community infrastructure would contribute to the Projects social license to operate.

Municipal Infrastructure and Service Capacity

The Impact Statement acknowledges that Municipalities and regional service providers raised concerns regarding infrastructure readiness, healthcare capacity, public safety, and social services during consultation activities.

While the Project proposes extensive onsite infrastructure including; potable water systems, sewage treatment facilities, water treatment infrastructure and camp accommodation, Municipal and regional service pressures are still likely to emerge during both construction and operations, noting the high local employment quotient included in the Impact Statement.

Potential pressure points include:

- Local healthcare systems and recruitment capacity
- Emergency response services
- Highway traffic increases, impacts on the safety of highway travelers and road maintenance
- Recreational and social service demand
- Contractor accommodation overflow
- Municipal infrastructure readiness
- Waste handling and landfill capacity

The assessment contains limited detailed modelling regarding traffic increases, long-term municipal infrastructure upgrades, emergency response demand scenarios and sewer and water demand impacts from an anticipated increase in local worker population.

Although the use of onsite infrastructure will reduce some Municipal impacts, it will not eliminate cumulative regional service pressures.

This area represents a potentially material gap between formal assessment and likely operational realities during both construction (peak personnel employed) and ongoing operations.

Shared Infrastructure and Regional Transportation Systems

The Impact Statement provides limited detailed assessment regarding impacts on shared regional transportation infrastructure, particularly aviation and airport capacity.

The document does not appear to comprehensively evaluate:

- Regional airport capacity
- Flight availability
- Passenger volume increases
- Cargo logistics congestion
- Airfare affordability impacts
- Competition for regional transportation services

Given the anticipated use of rotational workforces and contractor mobilization, these factors could become increasingly important economic opportunities, operational constraints and wider community impacts, particularly if multiple mining projects advance concurrently within northwestern Ontario.

Indigenous Relations and Long-Term Governance Risk

One of the strongest aspects of the Impact Statement is the extensive engagement framework established with Indigenous Nations, including:

- Environmental Management Committees
- Independent technical review support
- Indigenous knowledge integration
- Capacity agreements
- Watershed monitoring partnerships
- Ongoing consultation commitments

The document also demonstrates meaningful incorporation of Indigenous concerns into Project design refinements, particularly regarding:

- Mercury and methylmercury risks
- Water treatment
- Tailings management
- Wild Rice impacts
- Fish habitat compensation
- Long-term environmental monitoring

However, the most significant long term governance risk may ultimately relate not to technical compliance, but to maintaining trust-based relationships over the life of a 26+ year mining operation.

The Project exists within a region carrying significant historical sensitivities related to environmental concerns, Indigenous rights, and watershed protection. As a result:

- Community expectations will continue evolving over time
- Monitoring transparency will remain critical
- Any perceived gaps between commitments and outcomes may rapidly escalate reputational risk
- Long-term relationship management will require sustained operational attention well beyond permitting and construction phases

Conclusion

The Great Bear Gold Project Impact Statement demonstrates substantial effort toward environmental assessment, Indigenous engagement, and community benefit planning. The Project includes several strong mitigation measures, partnership initiatives, and long-term monitoring commitments.

Many of the highest operational and reputational risks associated with the Project are likely to emerge from cumulative regional socioeconomic pressures rather than direct site-specific environmental effects alone.

In particular, the following areas warrant continued attention, detailed long-term planning and transparency:

- Regional labour market impacts
- Housing availability and affordability
- Municipal infrastructure and healthcare capacity / impacts
- Shared transportation infrastructure
- Community expectations regarding benefit-sharing and transparency

These issues will likely become defining factors in the Project's long term social license, operational stability, and regional reputation.

Yours sincerely,



Jay Allen
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