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29 May 2026

Impact Assessment Agency of Canada
Place Bell Canada,
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Ottawa, ON
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By email: GreatBear@iaac-aeic.gc.ca

Re: Great Bear Gold Project, Summary of the Impact Statement
IAAC Reference Number: 85832

Dear Agency Team:

The Ontario Rivers Alliance (ORA) is a not-for-profit grassroots organization with a mission to protect, conserve and restore Ontario riverine ecosystems. ORA advocates for effective policy and legislation to ensure that development affecting Ontario rivers is environmentally and socially sustainable.

ORA has closely monitored the Great Bear Gold Project throughout each phase of the Impact Assessment process. These comments, submitted at the Impact Statement (IS) Summary stage as the third of four public comment opportunities, represent ORA's first formal submission to this assessment. We have engaged at this stage because the IS Summary places the proponent's full evidence base before the Agency and the public, and it is here that the substantive gaps in that evidence base are most visible and most consequential to address before the technical record is closed.

The proposed project is a large-scale open-pit and underground gold mine located within Treaty 3 territory, 23 kilometres southeast of Red Lake, Ontario, in the Chukuni River watershed. It would operate for 26 years, process 15,000 tonnes of ore per day, discharge treated effluent to the Chukuni River, and retain approximately 345 hectares of tailings behind three dams in perpetuity.

The Chukuni River flows to the English River, which passes through the traditional territory of Asubpeeschoseewagong Anishinabek (ANA/Grassy Narrows First Nation), a community whose members carry the documented health consequences of mercury contamination that followed industrial discharge into the English-Wabigoon River system in the 1960s.[1] That history is not peripheral to ORA's submission. It is the primary reason that each gap in the environmental and consultation record of this project carries exceptional weight.

ORA also recognizes the considerable effort the proponent has invested in several aspects of the assessment. The desulphurization flotation circuit combined with membrane filtration and reverse osmosis is a technically defensible tailings management approach, and the proponent has explicitly framed it as a direct response to ANA's mercury concerns. Funding for an independent, Anishinaabe-led Impact Assessment (ALIA) for Lac Seul First Nation (LSFN) and Wabauskang

First Nation (WFN) is a significant and commendable step that should be recognized as a model for future assessments in Treaty territories.

The Chukuni Watershed Aquatic Monitoring Program (CWAMP) and the Shared Spirits co-monitoring initiative demonstrate accountability that goes beyond the minimum. The pre-construction salvage of culturally significant plants, the Wild Rice Enhancement Project, and the commitments to the International Cyanide Management Code and the Global Industry Standard on Tailings Management are all measures worth acknowledging.[2] These commendations are offered in good faith. They do not diminish the seriousness of the gaps identified below.

1. Adequacy of Consultation: ANA and the Review Panel Question

The proponent has consulted with ANA throughout the assessment process. ANA has engaged meaningfully, including through formal submissions by the Canadian Environmental Law Association (CELA) as co-counsel. Their engagement is reflected in at least one key design decision: the proponent explicitly cites ANA's mercury concerns as the rationale for including membrane filtration as a tailings treatment measure.[3]

What ANA has not shared with the proponent is its Land Use and Occupancy Study (LUOS). The IS Summary acknowledges this directly: the proponent's characterization of ANA's current and future use of lands and resources downstream of the project relies on secondary sources and desktop review. For the community most directly at risk from 26 years of treated effluent discharge into the Chukuni-English River system, this gap is not procedural. It means the proponent cannot assess impacts to ANA's harvesting areas, fishing sites, travel routes, trapping territories, or cultural sites, all of which may lie within the effluent plume's zone of influence over the project life.[3]

ANA's decision to withhold the LUOS is a deliberate strategic choice. It reflects ANA's assessment that the proponent-led process cannot yet be trusted to use that information appropriately. CELA, on behalf of ANA, formally requested that this assessment be referred to an independent Review Panel under section 36 of the *Impact Assessment Act*, and renewed that request in July 2024 over the proponent's explicit objection.[4] ANA's assessment of the process it has been asked to participate in warrants serious consideration by the Agency.

The IS Summary's 'not significant' residual effects findings for ANA's rights, health, and social conditions depend on characterizations of ANA's current land use that ANA itself has not validated. A determination of 'not significant' built on incomplete and unvalidated data about the most directly affected downstream community is a determination that the record does not yet support.

ORA wishes to express its strong support and alignment with the submissions and recommendations of CELA on behalf of ANA/Grassy Narrows First Nation.

The Ontario Land Tribunal's (OLT) engagement with this project reinforces these concerns and bears directly on the adequacy of the Crown consultation record. In 2025, the OLT granted ANA leave to appeal water-taking permits issued by the Province of Ontario to Kinross, finding that "no reasonable person" would have issued those permits in light of ANA's documented mercury concerns. Kinross subsequently withdrew the permit application before the appeal could be heard. A new permit application was filed; on May 7, 2026, ANA filed a new application for leave to appeal the new permits, again on the grounds that sulphate discharge will drive mercury methylation in the Chukuni-English River system and produce elevated methylmercury concentrations in fish consumed by community members downstream.[12]

That ANA is simultaneously fighting Kinross's provincial operating permits in tribunal while being asked to participate in a proponent-led federal IA, and that it has already prevailed at tribunal on

the same sulphate-methylmercury pathway at issue here, is material to the Crown's consultation obligations. A proponent-led IA process that has not secured ANA's land use information, and whose residual effects findings for ANA remain unvalidated by ANA, does not represent an adequate foundation for approval where active parallel tribunal proceedings demonstrate the depth of ANA's unresolved concerns.

RECOMMENDATION 1: Before any decision is made on this assessment, the IAAC must require a supplementary assessment of project impacts on ANA and its members, conducted in partnership with ANA, on ANA's timeline, using ANA's land use information as a foundational data source. No adverse effects finding for ANA-related valued components should be considered adequate until ANA has validated the characterization of its own traditional territory.

RECOMMENDATION 2: IAAC must formally respond, with written reasons, to ANA's and CELA's request for a Review Panel referral before the Impact Assessment proceeds to the next stage. The adequacy of Crown consultation with ANA, given the documented history of methylmercury exposure in the English River system, is a threshold issue requiring a transparent and thorough public record. The OLT's prior finding that "no reasonable person" would have issued Kinross's provincial water-taking permits, and ANA's renewed May 2026 appeal of newly issued permits on the same grounds, confirm that ANA's concerns cannot be characterized as having been adequately addressed. These parallel provincial proceedings and the federal IA record must be considered together.

2. Methylmercury Pathway: Effluent Discharge to the Chukuni-English River System

The proposed project will discharge treated effluent to the Chukuni River for 26 years. The IS Summary demonstrates that treated effluent will meet the requirements of the *Metal and Diamond Mining Effluent Regulations* (MDMER) at the point of discharge.[5] That regulatory threshold, however, does not address the mechanism by which the greatest downstream risk to ANA manifests: the sulphate-driven methylmercury production pathway.

Sulphate in mine effluent promotes the activity of sulphate-reducing bacteria in downstream sediments, which methylate inorganic mercury already present in the system. Methylmercury bioaccumulates in fish tissue and biomagnifies through the food web. This pathway is well-established in the scientific literature and is particularly significant in the Chukuni-English River corridor, where historical mercury loading has left a legacy of inorganic mercury in sediments. A new, long-term source of elevated sulphate entering that system will not produce effects detectable at the compliance monitoring point. It will produce effects in the fish consumed by ANA members in the English River system downstream.[6]

The IS Summary acknowledges that the desulphurization circuit will reduce sulphate loading in treated effluent. It does not present modelled effluent sulphate concentrations in relation to threshold sulphate levels known to stimulate mercury methylation in receiving sediments. The CWAMP is structured around water quality compliance parameters, not around methylmercury concentrations in fish tissue, which is the biologically relevant endpoint for communities that depend on fish consumption in the English River system.

ANA formally documented this concern in the engagement record, citing 'cumulative adverse effects to fish and fish habitat...in combination with other activities and historic methylmercury contamination of the English-Wabigoon river system.'[3] The IS Summary does not resolve this concern.

That concern has not remained theoretical. The OLT, in its 2025 engagement with Kinross's provincial water-taking permits for this project, granted ANA leave to appeal on the grounds that sulphate discharge will drive mercury methylation in the receiving environment, finding that "no reasonable person" would have issued those permits. Kinross withdrew the application; ANA filed a renewed appeal in May 2026 when a new permit was issued. The sulphate-methylmercury pathway ORA identifies in Recommendations 3 through 5 is not a projection requiring future scientific validation. It is an active adjudicated concern that has already succeeded at the provincial tribunal level, on the same factual basis and in the same watershed that this federal assessment is evaluating.[12]

RECOMMENDATION 3: The proponent must conduct a site-specific methylmercury risk assessment for the Chukuni and English River corridor, modelling effluent sulphate loading under baseline, operational, and cumulative conditions in relation to sulphate-stimulated mercury methylation thresholds documented in the peer-reviewed scientific literature.

RECOMMENDATION 4: Effluent sulphate loading limits must be established to minimize methylmercury production risk in the receiving environment, not only to meet MDMER compliance thresholds. These limits must be derived from the site-specific risk assessment required under Recommendation 3.

RECOMMENDATION 5: The CWAMP must include systematic, longitudinal measurement of methylmercury concentrations in fish tissue at sites representative of ANA's fishing areas in the English River system. Methylmercury fish tissue triggers must be established as mandatory operational response thresholds, with defined escalation procedures up to and including operational adjustments to reduce sulphate loading.

3. Cumulative Effects Assessment Methodology

The IS Summary concludes that the Great Bear Gold Project has no spatial or temporal overlap with past, present, or reasonably foreseeable projects for essentially all pathway-level valued components (pVCs), including surface water quality, fish and fish habitat, species at risk, and Indigenous land and resource use. This conclusion applies to a project located in one of the most intensively developed mining corridors in Ontario, within a watershed that has received industrial effluent for decades and whose downstream communities carry documented cumulative health effects.

The 'no overlap' conclusion results from methodological choices: a study area too narrow for the geographic reach of downstream effects, and a project list that, by construction, avoids overlap. For surface water quality and fish habitat in the English River system, cumulative effects from historical and ongoing mining activity, forestry, and infrastructure are documented baseline conditions, not background noise. The IS Summary's cumulative effects assessment treats them as the latter.

This matters most in relation to ANA. The English-Wabigoon methylmercury contamination is itself a cumulative effect, decades of industrial loading that produced biological and human health consequences still being felt today. Any new sulphate source entering the Chukuni-English River system does not enter a clean environment. It enters a system already stressed. An assessment that finds 'no overlap' with that stress, for 26 years of operation, does not reflect the current state of the science on cumulative effects in mining-affected watersheds.[7]

RECOMMENDATION 6: The proponent must expand the cumulative effects study area for aquatic, fish, and Indigenous-rights pVCs to encompass the full English River watershed

from the project boundary to ANA's documented traditional territory, consistent with the geographic scope of project effects over a 26-year operating life.

RECOMMENDATION 7: The cumulative effects baseline for the English River system must incorporate historical mercury loading as a documented pre-existing condition. The additive effect of this project's effluent constituents, including sulphate, must be assessed against that baseline using methodology acceptable to ANA, LSFN, WFN, and Environment and Climate Change Canada (ECCC).

RECOMMENDATION 8: The cumulative effects assessment must apply a reasonable worst-case scenario for additive and synergistic effects on wild rice, fish habitat, water quality, and Indigenous land and resource use, not only a central-estimate scenario. Worst-case cumulative effects must be presented and addressed in the final Impact Statement before the assessment is considered adequate.

4. Wild Rice: Permanent Loss and Speculative Offset

Wild rice beds at location UW1 will be permanently lost within the project footprint. The IS Summary proposes to offset this loss through the Wild Rice Enhancement Project at two other locations. That project has not yet been implemented. No baseline success standard has been established. No contingency plan exists if the enhancement fails to produce a viable habitat. No minimum time horizon for demonstrating success has been set before any disturbance at UW1 proceeds.

Wild rice is not a generic aquatic species subject to standard offsetting logic. It holds deep cultural and dietary significance for the Anishinaabe nations whose traditional territories encompass the project area and its downstream watershed. LSFN and WFN have documented wild rice in their ALIA process. ANA's traditional use of wild rice in the English River system is part of the community's documented relationship with the land. Treating the permanent loss of wild rice habitat at UW1 as fungible against an unproven enhancement at two other sites fails to account for the cultural specificity of the species and the irreversibility of the loss.

RECOMMENDATION 9: The Wild Rice Enhancement Project must achieve measurable success at replacement sites, defined against agreed success criteria developed in consultation with LSFN, WFN, and ANA, before project activities disturb or affect the UW1 wild rice beds. Success criteria must include multi-year establishment benchmarks, not initial planting metrics.

RECOMMENDATION 10: The Wild Rice Enhancement Project must include defined failure thresholds and a mandatory contingency plan, identifying additional candidate sites and committed funding, reviewed and accepted by LSFN, WFN, and ANA, as a condition of any project approval.

5. Dixie Creek: Flow Reduction in a Protected Area

Dixie Creek flows within the Woodland Caribou Provincial Park boundary. The IS Summary acknowledges that groundwater inflows to the Viggo open pit will reduce Dixie Creek flows during the operational period, characterizing the residual effect as 'not significant' based on modelled predictions.[3] Dixie Creek supports cold water fish habitat in a protected area, and flow reductions during the critical summer low-flow period, when thermal stress on cold water species is greatest, are not given adequate weight in the significance determination.

The IS Summary's flow predictions are calibrated to historical climate conditions. They do not account for the compounding effect of climate-driven groundwater depletion over the 26-year operational period. The Ontario Provincial Climate Change Impact Assessment (OCCIA 2023), which was commissioned by the Ontario government, projects that dry conditions and extreme hot temperatures will 'change water balances and cause disruptions to the water flow regulation service, leading to reduced surface and groundwater levels, changes in intra-annual patterns of water availability, loss of available freshwater supplies for human use, wetland drying and loss, changes in distribution and abundance of animal and fish species and altered ecosystem function over a long term.'[8] Canada's Changing Climate Report documents that northern Ontario is warming at approximately three times the global average rate, making these projections acutely relevant to the Red Lake region over the project's operational life.[9]

The combination of pit dewatering drawdown and climate-driven reductions in summer groundwater recharge represents a compounding risk to Dixie Creek baseflows that the IS Summary does not model. A creek already under drawdown stress from an adjacent open pit will be further stressed by the same prolonged summer dry conditions projected to affect the broader region. The 'not significant' significance determination does not account for this compounding. If actual flows fall below coldwater fish thermal tolerance thresholds, the consequence within a protected area cannot be recovered once pit dewatering is underway.

RECOMMENDATION 11: The proponent must establish site-specific low-flow thresholds for Dixie Creek, developed in consultation with MNRF and DFO, with mandatory operational response triggers. If measured flows fall to or below defined thresholds during the operational period, pit dewatering operations must be subject to mandatory review and potential adjustment. Monitoring without defined response triggers is not a sufficient mitigation measure for flow reduction in a provincial park.

RECOMMENDATION 12: The Dixie Creek flow predictions must be remodelled using updated climate projections for the Red Lake region under mid-century (2050) and late-century (2075) scenarios, to determine whether the 'not significant' significance determination holds under projected climate conditions across the full operational period. Results must be disclosed in the final Impact Statement.

6. Potentially Acid-Generating Mine Rock and Post-Closure Pit Lake Water Quality

The IS Summary identifies potentially acid-generating (PAG) mine rock among the site's waste materials and proposes underwater storage for the highest-risk material as the primary mitigation for acid rock drainage (ARD).[3] Post-closure, two pit lakes will form. The long-term water quality of those pit lakes and their potential to export ARD or metal-laden seepage to surrounding groundwater and surface water in the Chukuni watershed is assessed at a level of detail appropriate to a conceptual study, not a 26-year operating mine with perpetual post-closure obligations.

Post-closure pit lake chemistry is notoriously difficult to predict. Equilibration can take decades. The consequences of ARD or elevated metals in post-closure seepage are long-term and costly to remediate. Financial assurance calculations must reflect worst-case closure scenarios, not central-estimate predictions, and must be updated as operational experience accumulates.

RECOMMENDATION 13: Before project approval, the proponent must submit a post-closure pit lake water quality monitoring plan that includes defined intervention triggers, escalation procedures, and contingency response plans, acceptable to ECCC and the affected Indigenous communities.

RECOMMENDATION 14: The proponent's financial assurance calculation must be updated to reflect worst-case long-term ARD risk and post-closure seepage scenarios, recalculated at defined intervals throughout the operational period, and made publicly available on the IAAC registry.

7. Climate Resilience and Tailings Dam Safety

The tailings management facility (TMF) encompasses 345 hectares retained behind three dams, with obligations extending through operations and post-closure in perpetuity. Northwestern Ontario is projected to experience increased frequency and intensity of precipitation events as global temperatures rise. The OCCIA 2023 classifies electrical power generation infrastructure as the highest-risk category under projected climate change, with risks described as 'high' now and expected to 'remain high for all future time periods.'[8] While the TMF is not a power generation structure, it shares the same vulnerability: critical structural components exposed to precipitation extremes whose frequency and intensity will increase continuously over the project's 26-year operational and perpetual post-closure periods. The IS Summary acknowledges this risk. Its characterized mitigation response is 'ongoing monitoring and adaptive management.'

Canada's Changing Climate Report documents that northern Ontario is warming at approximately three times the global average rate.[9] This accelerated warming intensifies the hydrological cycle in ways directly relevant to tailings dam safety: a higher frequency of extreme precipitation events tests spillway capacity; increased rain-on-snow and freeze-thaw events stress dam structures through loading and seepage cycles; and summer convective storm intensity increases the probability of precipitation events that exceed historical design standards. Intensity-duration-frequency (IDF) curves calibrated to historical precipitation records already understate current design requirements and will further understate future requirements over a multi-decade operational and post-closure period.

Ongoing monitoring is a surveillance tool, not a mitigation measure for structural failure risk. A failure of any one of the three TMF dams would deliver a catastrophic load of tailings to the M, with consequences that would extend to the English River system and ANA's traditional territory. The appropriate response to increasing precipitation intensity projections is to confirm, before any dam is constructed, that spillway capacity and structural integrity are sufficient for updated IDF projections under mid-century and late-century climate scenarios, not to monitor for failure after construction.

RECOMMENDATION 15: Before construction approval, the proponent must conduct a dam safety review calibrated to updated IDF curves for the Red Lake region under projected 2050 and 2075 climate scenarios, confirming that all three tailings dam spillways have sufficient capacity to safely pass probable maximum flood events under those projections.

RECOMMENDATION 16: The tailings facility design criteria must be reviewed, and if necessary updated, to reflect the IDF projections confirmed under Recommendation 15, before construction of any dam component proceeds. The review must be conducted by an engineer independent of the project proponent, with results made publicly available on the IAAC registry.

8. Land and Resource Use: Explicit Absence of Mitigation

The IS Summary states explicitly that no mitigation is planned for certain residual adverse effects on commercially based land and resource use (LARU).[3] Commercially based LARU in this region, including commercial fishing, trapping, and wild harvesting, overlaps geographically and practically with Indigenous-rights-based LARU. The communities whose incomes depend on

commercial harvesting are often the same communities whose treaty rights to harvest are assessed separately under the Indigenous peoples' federal valued component.

A finding of residual adverse effects with no mitigation planned is incomplete. The proponent must explain why no mitigation is feasible, quantify the magnitude and duration of unmitigated effects, and describe what compensation or transition support, if any, is proposed for affected parties.

RECOMMENDATION 17: The proponent must supplement the IS with a detailed account of the residual adverse effects on commercially based LARU for which no mitigation is currently planned, including: the specific activities affected, the duration and socio-economic magnitude of effects on affected households and communities, and a proposed compensation or adaptive management framework developed with affected parties, including Indigenous communities where commercial and rights-based LARU overlaps.

9. Greenhouse Gas Emissions: Aspiration Without Accountability

The proposed project will operate for 26 years using natural gas as the primary energy source for the processing plant and mobile equipment, generating significant GHG emissions over the project life. The IS Summary acknowledges this. In mitigation, it references Kinross's corporate commitment to net-zero emissions by 2050. No project-specific GHG reduction targets are established. No timeline for electrifying any operational component is provided. No analysis of renewable energy alternatives is included.

A 26-year operating mine with no project-level GHG commitments contributes to Canada's emissions profile through two decades when federal targets require substantial reductions. A corporate aspiration is not a project condition. The federal impact assessment process is the appropriate mechanism to convert that aspiration into accountability.

RECOMMENDATION 18: The proponent must establish project-specific GHG reduction targets with defined timelines aligned with the project's operational phases. These targets must be conditions of any approval, with progress reported publicly at defined intervals throughout the operational period.

RECOMMENDATION 19: The proponent must complete and disclose an analysis of the technical and economic feasibility of electrifying processing plant and mobile equipment operations, including the use of on-site renewable energy generation (wind, solar, and long-term battery storage), as part of the final Impact Statement.

10. Woodland Caribou and SARA Critical Habitat

Woodland Caribou (Boreal population) (*Rangifer tarandus caribou*) is listed as Threatened under the *Species at Risk Act* (SARA). The proposed project is located immediately adjacent to Woodland Caribou Provincial Park, a protected area established specifically for boreal woodland caribou conservation. The IS Summary includes woodland caribou as a pathway-level valued component and concludes residual effects are 'not significant.' That conclusion warrants scrutiny.

ECCC's recovery science for boreal woodland caribou identifies a 35% total anthropogenic disturbance threshold within a local population range as the level beyond which self-sustaining populations are unlikely to be maintained. The project footprint, associated road network, and 26 years of operational disturbance from noise, light, vibration, and human activity occur at the boundary of the park, a landscape where cumulative disturbance from existing and legacy development in the Red Lake mining corridor is already documented. The IS Summary's cumulative disturbance assessment for caribou uses the same narrow study area definition that

produces the 'no overlap' finding for aquatic pVCs, and it does not present a disturbance-threshold analysis using ECCC's 35% framework.[10]

The access road network is a particularly significant concern. All-season roads are one of the most documented drivers of woodland caribou range abandonment in boreal Ontario. A road network that connects the project site to the provincial highway system through or adjacent to Woodland Caribou Provincial Park creates permanent fragmentation that persists long after operations cease. The IS Summary does not model road-effect zones or their interaction with the park boundary.

Under SARA sections 58 and 73, the Crown has obligations to protect critical habitat of listed species, and any federal authorization for a project that may affect critical habitat requires a SARA authorization with defined conditions. The status of SARA authorization for this project, and the conditions that would be attached to it, are not presented in the IS Summary.

RECOMMENDATION 20: The proponent must provide a project-specific woodland caribou disturbance assessment using ECCC's 35% total anthropogenic disturbance threshold for the relevant local population range, incorporating the project footprint, access road network, road-effect zones, and all existing and reasonably foreseeable disturbances within the range. Results must be presented in the final Impact Statement.

RECOMMENDATION 21: The status of SARA section 73 authorization for impacts to woodland caribou critical habitat must be disclosed in the final Impact Statement, with conditions of any authorization made publicly available on the IAAC registry before the assessment proceeds to a decision.

11. Fish Habitat Offsetting and the Fisheries Act Authorization

Under section 35 of the *Fisheries Act*, causing serious harm to fish in waters frequented by fish requires authorization from Fisheries and Oceans Canada (DFO). The proponent has prepared a Fish Habitat Offsetting and Compensation Plan (FHOCP) to address anticipated serious harm from the project, including losses associated with watercourse crossings, streamflow alteration in Dixie Creek, and stream segments within the project footprint.[11]

The IS Summary confirms that an FHOCP has been prepared but does not disclose the quantitative assessment of habitat losses or the proposed offsetting gains in sufficient detail for independent evaluation. ORA cannot determine from the IS Summary whether the proposed offsetting achieves no net loss of fish habitat productive capacity, or whether it merely achieves area equivalency between lost and replacement habitat. These are not the same standard. Productive capacity accounts for the quality, function, and ecological connectivity of habitat, not just its area.

DFO authorization under the *Fisheries Act* has not yet been issued, and the conditions of that authorization are not before the Agency. Those conditions are material to the adequacy of the overall assessment: they define what mitigation DFO has deemed sufficient, and they represent a commitment that runs parallel to, and must be consistent with, the impact assessment conditions.

RECOMMENDATION 22: The proponent must disclose the full FHOCP in the final Impact Statement, including the quantitative assessment of fish habitat losses by type and function, the proposed offsetting measures and their projected habitat productive capacity gains, and the timeline for implementing offsetting relative to project activities. The FHOCP must

demonstrate no net loss of fish habitat productive capacity using DFO-accepted metrics, not area equivalency alone.

RECOMMENDATION 23: The conditions of the DFO *Fisheries Act* section 35 authorization, once issued, must be made publicly available on the IAAC registry and cross-referenced in the assessment record before a final impact assessment decision is made.

In Closing:

The Great Bear Gold Project asks this Agency, and the downstream communities of the Chukuni River and English River watersheds, to accept 26 years of industrial activity and its residual effects, in perpetuity in the case of the tailings facility, in exchange for economic benefits that will accrue primarily during the operational period. That is a trade-off requiring rigour commensurate with its duration and its stakes. The communities of the English River watershed, and ANA in particular, have already lived through the consequences of industrial activity whose downstream effects were deemed acceptable at the time of approval. They deserve an assessment that closes the gaps identified in these recommendations before any approval is granted.

ORA urges the Agency to require the supplementary work identified in each of these recommendations before proceeding to the next stage of the assessment.

Thank you for this opportunity to comment.

Respectfully submitted,

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End Notes

1 *Asubpeeschoseewagong Anishinabek (Grassy Narrows First Nation), Mercury Background. See also: Health Canada, Mercury and Human Health, https://www.canada.ca/en/health-canada/services/environmental-workplace-health/reports-publications/environmental-contaminants/mercury-fish-grassy-narrows-en.html.*

2 *Great Bear Resources Ltd. (Kinross), Great Bear Gold Project, Summary of the Impact Statement, WSP Canada Inc., April 2026, Canadian Impact Assessment Registry Reference No. 85832, https://iaac-aeic.gc.ca/050/evaluations/proj/85832. Commendations drawn from Sections 7, 8, and 14 of the IS Summary.*

3 *Great Bear Resources Ltd. (Kinross), Great Bear Gold Project, Summary of the Impact Statement, WSP Canada Inc., April 2026, Canadian Impact Assessment Registry Reference No. 85832, https://iaac-aeic.gc.ca/050/evaluations/proj/85832.*

4 *Canadian Environmental Law Association, on behalf of Asubpeeschoseewagong Anishinabek, Request for Review Panel Referral under s. 36 of the Impact Assessment Act, SC 2019, c 28, s 1, submitted to the Impact Assessment Agency of Canada, 2024, IAAC Registry Reference No. 85832, https://iaac-aeic.gc.ca/050/evaluations/proj/85832.*

5 *Metal and Diamond Mining Effluent Regulations, SOR/2002-222 as amended, Government of Canada, https://laws-lois.justice.gc.ca/eng/regulations/SOR-2002-222/.*

6 *Gilmour, C.C. et al. (1992), 'Sulfate stimulation of mercury methylation in freshwater sediments,' Environmental Science & Technology, 26(11), 2281-2287. See also: Environment and Climate Change Canada, Mercury in the Environment, https://www.canada.ca/en/environment-climate-change/services/pollutants/mercury-environment.html.*

7 *Fisheries and Oceans Canada (2020), A Review of Cumulative Effects Research and Assessment in Fisheries and Oceans Canada, Canadian Technical Report of Fisheries and Aquatic Sciences 3357, https://waves-vagues.dfo-mpo.gc.ca/Library/40875356.pdf.*

8 *Ontario Ministry of the Environment, Conservation and Parks, Ontario Provincial Climate Change Impact Assessment: Technical Report (OCCIA 2023), November 2023, https://www.ontario.ca/page/ontario-provincial-climate-change-impact-assessment. PDF: https://www.ontario.ca/files/2023-11/mecp-ontario-provincial-climate-change-impact-assessment-en-2023-11-21.pdf.*

9 *Bush, E. and Lemmen, D.S. (eds.) (2019), Canada's Changing Climate Report, Government of Canada, Ottawa, ON, https://changingclimate.ca/CCCR2019/.*

10 *Environment and Climate Change Canada (2012, amended), Recovery Strategy for the Woodland Caribou, Boreal population (Rangifer tarandus caribou) in Canada, Species at Risk Act Recovery Strategy Series, Government of Canada, Ottawa, ON, https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry/recovery-strategies/woodland-caribou-boreal-2012.html.*

11 *Fisheries Act, RSC 1985, c F-14, s 35, https://laws-lois.justice.gc.ca/eng/acts/F-14/.*

12 *Fatima Syed, "Grassy Narrows seeks to appeal mine permits over mercury concerns," The Narwhal, 28 May 2026. Available at: https://thenarwhal.ca/grassy-narrows-kinross-permit-appeal/. See also: "Ontario fast-tracks mine despite Grassy Narrows First Nation's concerns," The Narwhal, 2026. Available at: https://thenarwhal.ca/grassy-narrows-ontario-mine-permit/*