

**Enclosure 1: Provincial Authority Advice Record – Great Bear Gold Project Impact Statement (Batch 3)**

Please submit the completed form by **DATE**, via email at [GreatBear@iaac-aeic.gc.ca](mailto:GreatBear@iaac-aeic.gc.ca).

**Ministry or Organization Contact Information**

<b>Submission Date</b>	
<b>Ministry/Organization</b>	
<b>Lead Contact, Title, Work Unit</b>	
<b>Email, Phone</b>	
<b>Alternate Contact, Title, Work Unit</b>	
<b>Email, Phone</b>	

1. Taking into account the Project Context and Targeted Questions that IAAC has shared, review Batch 3 of the Impact Statement and provide views for IAAC’s consideration in the analysis of the project’s effects and preparation of the Impact Assessment Report (Table 1) or identify potential outstanding information requirements in the Impact Statement (Table 2). You may also wish to provide IAAC with advice to the proponent to support regulatory efficiency (Table 3). Tables 1, 2 and 3 (attached) provide additional guidance to support your review.
2. As per the Cooperation Plan<sup>1</sup>, consider all the mechanisms in place to manage potential federal effects. If your ministry is responsible for, or aware of, any relevant provincial regulatory, policy or other instruments and measures (i.e. complementary measures<sup>2</sup>) that may help manage the project’s potential adverse federal effects, please specify and describe applicability to the project and any known limitations to managing effects.

\_\_\_\_\_  
**Name of Ministry / Organization Responder**

\_\_\_\_\_  
**Title of Responder**

\_\_\_\_\_  
**Date**

<sup>1</sup> <https://iaac-aeic.gc.ca/050/evaluations/document/158179>

<sup>2</sup> Complementary measures are additional authorities of government officials or programs that may be used to mitigate effects that may be beyond the care and control of the proponent. They can be taken into account in decision-making.

**Table 1. Views to Inform the Impact Assessment**

Table 1 can be used to provide views for IAAC’s consideration in the analysis of the project’s federal effects<sup>3,4,5</sup> and preparation of the Impact Assessment Report, considering your ministry’s local knowledge and regulatory expertise. Reviewers should consider project context (see Enclosure 2 for more detail on the key issues and targeted questions) and are encouraged to provide solution-oriented advice even where potential gaps in information are observed.

Comment ID	Reference to Impact Statement	Views to Inform the Impact Assessment
<i>Please identify comments by ministry and number. e.g.: MNR-01</i>	<i>Identify the specific section of the Impact Statement to which your comment applies.</i>	<i>Provide views and information for IAAC’s consideration in the analysis of adverse federal effects, such as</i> <ul style="list-style-type: none"> <li><i>whether the information is technically appropriate to support the conclusions presented, and the proposed mitigation measures are suitable to manage effects, considering regional context;</i></li> <li><i>sources of uncertainty in the proponent’s analysis that may substantially weaken conclusions, if any;</i></li> <li><i>suggestions for provincial operational guidance or standards, including other mitigation and monitoring measures, that are well understood to be effective in the region;</i></li> <li><i>relevant provincial legislative frameworks such as licensing, permitting, policies or programs that may provide another means to address adverse effects (describe the environmental outcomes that are typically achieved by the frameworks, how they are achieved, and whether mitigation and monitoring may be required and enforced); and</i></li> <li><i>if your ministry has identified any permit or approval that it may not be able to issue to allow the Project to proceed as currently planned, and next steps for resolution of any issues.</i></li> </ul>

*Please insert additional rows as necessary.*

**Table 2. Missing Information in Relation to the Tailored Impact Statement Guidelines**

Table 2 should be used to identify missing or unclear information from the Impact Statement that is **both** 1) required by the Tailored Impact Statement Guidelines **and** 2) required to formulate ministry views to inform the impact assessment.

Outstanding Information Requirement ID	Reference to Impact Statement	Reference to Tailored Impact Statement Guidelines	Description of Outstanding Information Requirement (Context and Rationale)	Advice for Resolving Outstanding Information Requirement
<i>Please identify Outstanding Information Requirements by ministry and number. e.g.: MNR-02</i>	<i>Identify the specific section of the Impact Statement related to information requirement</i>	<i>Identify the specific section of the Tailored Impact Statement Guidelines related to information requirement</i>	<i>Provide a brief description of the outstanding information requirement, including a rationale for how the missing could inform the impact assessment. Include, where relevant:</i> <ul style="list-style-type: none"> <li><i>how the outstanding information requirement relates to an adverse effect (please indicate if it is federal or provincial jurisdiction) or to a public interest factor including outlining the relevant pathway of effect (see Enclosure 2 for more detail on the key effects and targeted questions).</i></li> </ul>	<i>Provide a clear and precise description of the missing information that would resolve the issue. Optionally provide other commitments the proponent can make to respond, such as:</i> <ul style="list-style-type: none"> <li><i>offsetting or mitigation to compensate for uncertainty in baseline;</i></li> <li><i>follow-up to verify the accuracy of predictions and effectiveness of mitigation;</i></li> <li><i>applicable guides, standards and thresholds the proponent intends to meet; and</i></li> <li><i>measures the proponent intends to take to comply with other legislative frameworks that provide a means to address effects.</i></li> </ul>

*Please insert additional rows as necessary.*

**Table 3. Advice to the Proponent to Support Regulatory Efficiency**

Table 3 can be used to inform future or concurrent provincial regulatory processes for the Project, to support regulatory efficiency.

Advice ID	Reference to Impact Statement	Provincial Permit or Licence	Advice to the Proponent to Support Permitting Efficiency
<i>Please identify advice by ministry and number. e.g.: MNR-03</i>	<i>Identify the section of the Impact Statement to which your comment applies.</i>	<i>List the potential approval or relevant legislative framework</i>	<ul style="list-style-type: none"> <li><i>Describe information needed to determine if the provincial approval is required.</i></li> <li><i>Identify if the Impact Statement could be sufficient to complete the permitting process. If not, briefly describe what is needed next.</i></li> <li><i>Advise how the Proponent can coordinate regulatory requirements with the remainder of the impact assessment process to streamline approvals.</i></li> <li><i>Describe environmental outcomes of the regulatory framework and how they are achieved such as regulations or enforceable conditions.</i></li> <li><i>Identify any permit or approval that your ministry may not be able to issue to allow the Project to proceed as currently planned, and next steps to resolve issues.</i></li> </ul>

<sup>3</sup> “Federal effects” for this purpose means adverse effects within federal jurisdiction and adverse effects that are direct or incidental to the exercise of a federal power, duty or function (as defined in section 2 of the *Impact Assessment Act*).

<sup>4</sup> IAAC also invites views on effects related to public interest factors (defined in section 63 of the *Impact Assessment Act*) that may inform decision-making, such as positive effects on local economic conditions that contribute to sustainability.

<sup>5</sup> IAAC also invites views on potential effects to species at risk, and how they are typically managed in the region, to inform IAAC’s obligations under section 79 of the *Species at Risk Act*.

MEM-1	Section 5 Project Description	Closure Plan ( <i>Mining Act</i> )	<ul style="list-style-type: none"> <li>Per Section 5.4.2.1, the Viggo Pit will be fully developed during the construction phase, then the East lobe will be used to store concentrate tailings during operations through to post-closure. In the event that the Viggo Pit is not fully exhausted during the construction phase, is there a contingency in place for storage of the concentrate tailings?</li> </ul>
MEM-2	Section 5 Project Description	Closure Plan ( <i>Mining Act</i> )	<ul style="list-style-type: none"> <li>Section 5.7.2 describes the design of the TMF and associated perimeter dams. Is a preliminary design report available for the TMF dams and TMF Pond Dam?</li> </ul>
MEM-3	Section 5 Project Description	Closure Plan ( <i>Mining Act</i> )	<ul style="list-style-type: none"> <li>Section 5.7.2 indicates that the TMF dams will have rockfill shells and sand and gravel filters in order to retain solids and allow water to pass through. Water passing through the South Dam will report to the TMF Pond. Where will water passing through the North and West Dams report? Is an impermeable element required to prevent discharge through the North and West Dams, until a tailings beach is developed?</li> </ul>
MEM-4	Appendix U-1 Tailings Inundation Study	Closure Plan ( <i>Mining Act</i> )	<ul style="list-style-type: none"> <li>Table 2-1 in Section 2.3 of Appendix U-1 indicates that the TMF Pond Dam has a crest elevation of 385 m and a spillway invert elevation of 388 m, and the top of the sheet pile wall is at an elevation of 389 m. As such, 3 m of water may pond above the dam crest before there is discharge through the spillway. Will the ponding of water above the dam crest impact the dam performance?</li> </ul>
MEM-5	Appendix S Preliminary Closure Plan	Closure Plan ( <i>Mining Act</i> )	<ul style="list-style-type: none"> <li>Section 9.13 notes that the TMF surface will be covered with overburden and revegetated. Will the dam slopes be revegetated?</li> </ul>
MEM-6	Appendix S Preliminary Closure Plan	Closure Plan ( <i>Mining Act</i> )	<ul style="list-style-type: none"> <li>Per Section 9.15, once no longer required for closure water management, the CWP, TMF Pond and WMP dams will be contoured and stabilized to naturalize flows or to drain by gravity, and the areas will be revegetated. <ul style="list-style-type: none"> <li>Will the dams be breached to their full depth, or will they still retain a pond?</li> <li>Will the sheet pile wall (which appears to extend 4 m above the dam crest for the TMF Pond Dam) be removed?</li> <li>Will the remaining embankments be vegetated?</li> </ul> </li> </ul>

Please insert additional rows as necessary.