

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.

Ministry or Organization Contact Information

Submission Date	
Ministry/Organization	Ontario Ministry of Energy and Mines
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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 Plan¹, 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 measures²) 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.

Ontario Ministry of Energy and Mines
Raymond McCarthy

**Name of Ministry / Organization
Responder**

Rehabilitation Specialist – Surface
Water

Title of Responder

01/06/26

Date

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

² 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^{3,4,5} 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"> <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> <i>sources of uncertainty in the proponent's analysis that may substantially weaken conclusions, if any;</i> <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> <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> <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>
MEM-1	Appendix S – Preliminary Closure Plan	It is the view of the Surface Water Rehabilitation Specialist that the preliminary closure plan presented does not conform to the regulatory structure required under the Mining Act, Specifically Ontario Regulation 35/24 and the Ontario Mine Rehabilitation Code. Of concern in this plan is the narrow focus placed on the project, a 250m buffer from built infrastructure. Batch 2 Comments indicated that the narrow scoping prevents a fulsome discussion of baseline monitoring as required for post closure monitoring. Proposed surface water monitoring locations are also inadequate in scope to assess potential impacts to the entirety of the project area and it's surrounding land. MEM would not be able to accept the preliminary closure plan presented as part of the regulated closure planning process. Next steps to bring the closure plan into compliance would be to begin background monitoring of the sites indicated in batch 2 (which will be reiterated below), to add those background sites to post closure monitoring, and to have a discussion with ministry rehabilitation staff on additional deficiencies under O.Reg 35/24

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"> <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> 	<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"> <i>offsetting or mitigation to compensate for uncertainty in baseline;</i> <i>follow-up to verify the accuracy of predictions and effectiveness of mitigation;</i> <i>applicable guides, standards and thresholds the proponent intends to meet; and</i> <i>measures the proponent intends to take to comply with other legislative frameworks that provide a means to address effects.</i>

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
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³ “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*).

⁴ 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.

⁵ 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*.

<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"> • <i>Describe information needed to determine if the provincial approval is required.</i> • <i>Identify if the Impact Statement could be sufficient to complete the permitting process. If not, briefly describe what is needed next.</i> • <i>Advise how the Proponent can coordinate regulatory requirements with the remainder of the impact assessment process to streamline approvals.</i> • <i>Describe environmental outcomes of the regulatory framework and how they are achieved such as regulations or enforceable conditions.</i> • <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>
MEM-1	Appendix S – Preliminary Closure Plan Section 10; Fig 10-1	Closure Plan required under the Mining Act meeting the Ontario Mine Rehabilitation code via O.Reg 35/24	<ul style="list-style-type: none"> • The scoping of the “project area” in this EA process is significantly more narrow than needs to be considered for closure planning under the Mining Act. The proponent has applied a 250m buffer to anticipated built infrastructure, where as the Mining Act and Closure Plan required the entirety of the mining lands to be considered in the closure process. To be specific, a surveyed lease will be issued to the proponent which ties directly to their rehabilitation requirements under part VII of the Mining Act of Ontario and those lands must be managed in closure according to our Mine Rehabilitation Code. • The impact statement as provided is insufficient to complete the permitting process. MEM has identified the following waterbodies which require background (pre-development) monitoring to be compliant with the code for closure: Unnamed watercourse 7, unnamed waterbody 7. These water bodies should also be added to post closure monitoring. The commencement of additional background site monitoring is critical in avoiding potential delays to development • Discussion of post closure surface water monitoring locations will be discussed under separate cover in the provincial process,

Please insert additional rows as necessary.