

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

Please submit the completed form by **May 29, 2026**, via email at GreatBear@iaac-aeic.gc.ca.

Ministry or Organization Contact Information

Submission Date	June 8, 2026
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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.

Caitlyn Tindale

**Name of Ministry / Organization
Responder**

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.

Director, Heritage Operations Branch
Title of Responder

June 8, 2026
Date

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
<p>Please identify comments by ministry and number. e.g.: MNR-01</p>	<p>Identify the specific section of the Impact Statement to which your comment applies.</p>	<p>Provide views and information for IAAC’s consideration in the analysis of adverse federal effects, such as</p> <ul style="list-style-type: none"> • whether the information is technically appropriate to support the conclusions presented, and the proposed mitigation measures are suitable to manage effects, considering regional context; • sources of uncertainty in the proponent’s analysis that may substantially weaken conclusions, if any; • suggestions for provincial operational guidance or standards, including other mitigation and monitoring measures, that are well understood to be effective in the region; • 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 • 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.
<p>MCM-01</p>	<p>Section 6.2 Environmental Baseline Methodology Page 6-2</p>	<p>MCM is responsible for the administration of the <i>Ontario Heritage Act</i> (OHA) and its associated regulations. The OHA provides the primary statutory framework for the conservation of cultural heritage resources in Ontario, including their identification, protection and wise management. The conservation of cultural heritage resources (which includes archaeological resources, built heritage resources and cultural heritage landscapes) is also a matter of provincial interest and importance as reflected in legislation such as the <i>Planning Act</i> and the <i>Environmental Assessment Act</i>, among others. MCM is responsible for the implementation of the <i>Standards and Guidelines for Conservation of Provincial Heritage Properties</i> (Part III.1 of the OHA) and regulates archaeology in Ontario, including the licensing of archaeologists and the review of archaeological assessment reports (Part VI of the OHA).</p> <p>The mandate of MCM relates to federal jurisdiction under the category of Physical and Cultural Heritage as it pertains to Indigenous and non-Indigenous communities.</p> <p>Although the Ministry of Citizenship and Multiculturalism (MCM) does not issue permits or authorizations, the Ministry exercises a statutory advisory and oversight function related to the conservation of cultural heritage resources under the OHA and associated provincial standards, policies, and guidelines.</p> <p>‘Cultural heritage’ and ‘archaeology’ were identified as pathway valued components because of provincial regulatory requirements and interest and because they may provide a pathway to affect a federal value component (Indigenous Peoples). The Ministry of Citizenship and Multiculturalism (MCM) will review any technical cultural heritage studies related to this project to support compliance with the <i>Ontario Heritage Act</i> (OHA).</p> <p>We acknowledge that Appendix Q-1 (terrestrial archaeology) and Q2 (marine archaeology) have been included as part of Batch 3.</p> <p>The referenced appendices related to Cultural Heritage should include: P1, P2, and P3.</p>
<p>MCM-02</p>	<p>Section 7.14 Predicted Changes to Cultural Heritage Page 7-488</p>	<p>The technical cultural heritage studies (i.e., archaeological assessment, cultural heritage report, cultural heritage evaluation) are the appropriate studies to support the conclusions presented, including the proposed mitigation measures. However, MCM may have additional comments once it has reviewed any such technical heritage studies.</p> <p>We note that the terminology related to cultural heritage is a combination of federal and provincial regulatory frameworks. However, we have some recommendations for clarity and consistency with the provincial framework:</p> <ul style="list-style-type: none"> • Cultural heritage resources include archaeological resources, built heritage resources and cultural heritage landscapes. For purposes of the IAA process, it has been separated in two parts: (1) cultural heritage, which will include is inclusive of built heritage resources (BHRs) are constructed features associated with a property’s cultural heritage value and includes a building, structure, monument, installation, or any manufactured or constructed part or remnant that contributes to a property’s cultural heritage value or interest as identified by a community, including an Indigenous community, and cultural heritage landscapes (CHL), which are defined geographic areas that may have been modified by human activity and is identified as having cultural heritage value, or interest by a community and (2) archaeological resources which include artifacts, archaeological sites, and marine archaeological sites, as defined under the <i>Ontario Heritage Act</i>. Archaeological resources are considered as a separate pvc (Provincial Planning Statement, 2024) (see Section 7.15).

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*.

MCM-03	7.14.2.1.2 Provincial Page 7-489	<p>MCM has the following recommended edits to this Section to better reflect the provincial regulatory framework:</p> <p>7.14.2.1.2 Provincial The Government of Ontario The Province recognizes the importance of conserving BHRs and CHLs in the <i>Ontario Heritage Act</i>. The Act provides a framework for the identification, evaluation and conservation of cultural heritage resources in the province and gives municipalities and the provincial government powers to identify and designate properties of heritage significance; provide standards and guidelines for the conservation of provincial heritage properties; and enhance protection of heritage conservation districts, marine heritage sites, and archaeological resources.</p> <p>The Ministry of Citizenship and Multiculturalism (MCM) is responsible for the administration of the <i>Ontario Heritage Act</i> and its associated regulations. MCM has developed checklists, information bulletins, standards and guidelines, and policies to support the conservation of cultural heritage resources. The MCM fulfills a lead role in directly conserving and protecting BHRs and CHLs in Ontario, which is triggered through other legislated processes.</p> <p>The OHA provides the primary statutory framework for the conservation of cultural heritage resources in Ontario, including their identification, protection and wise management. The conservation of cultural heritage resources (which includes archaeological resources, built heritage resources and cultural heritage landscapes) is also a matter of provincial interest and importance as reflected in legislation such as the <i>Planning Act</i> and the <i>Environmental Assessment Act</i>, among others. MCM is responsible for the implementation of the Standards and Guidelines for Conservation of Provincial Heritage Properties (Part III.1 of the OHA) and regulates archaeology in Ontario, including licensing archaeologists (Part VI of the OHA). The mandate of MCM relates to the federal jurisdiction on Physical and Cultural Heritage as it relates to Indigenous and non-Indigenous communities.</p> <p>The Ministry of Citizenship and Multiculturalism has an interest in undertakings such as this under its mandate and regulatory role. As a member of the Government Review Team, MCM reviews various applications and associated technical cultural heritage studies, including those under an environmental assessment process, to ensure compliance with the <i>Ontario Heritage Act</i> and fulfilment of due diligence related to cultural heritage more generally. These technical studies are prepared by qualified persons commissioned by the proponent. and/or</p> <p>Should changes or impacts to potential BHRs and CHLs are anticipated, the subject property is to be evaluated to determine the cultural heritage value or interest (CHVI) of the property, in accordance with Ontario Regulation 9/06 (as amended by Ontario Regulation 569/22) and Ontario Regulation 10/06. Under Ontario Regulation 9/06, criteria are described to determine the CHVI of a property at a local level, while under Ontario Regulation 10/06, criteria are described to determine if a property has CHVI of provincial significance. Info Bulletin #3 provides detailed guidance on the contents of a CHIA.</p> <p>[...]</p>
MCM-04	7.14.2.3 Assessment Criteria Page 7-491	<p>The assessment of effects (or impacts) on cultural heritage (BHRs/CHLs) should include the identification of the presence of known (previously recognized) and potential BHRs/CHLs and assess the direct and indirect effects (impacts on those resources. The section only acknowledges the direct effects (e.g., alteration or destruction) and does not inform how the conclusion is reached that there are no known or potential resources in the spatial boundaries.</p> <p>MCM recommends the following edits: In undertaking the assessment of cultural heritage effects, the following criteria were used:</p> <ul style="list-style-type: none"> • Presence of known (previously recognized) protected BHRs or CHLs (or protected heritage properties) • Presence of potential BHRs and CHLs that are 40 years old or older • Direct effects (impacts, such as alteration, demolition or removal, or destruction) on of a known protected or potential BHR or CHL. • Indirect effects (impacts, such as vibration, alteration or obstruction of a significant view) on known or potential BHRs or CHLs. <p>A Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment has been prepared to document the analysis. The report concluded that no known or potential BHRs are present in the spatial boundaries considered. Five potential CHLs are present in the spatial boundaries considered (The Cultural Heritage Report is included in Appendix P-1). [Please note: <i>The findings of this Cultural Heritage Report shall be considered preliminary until MCM has had a chance to review it. Revisions may be required</i>].</p>

MCM-05	7.14.2.4 Analytical Methods Page 7-491	This paragraph should be revised to refer to Section 7.14.2.1 (Regulatory Setting). The method to undertake the Cultural Heritage Report was not based only on the Standards and Guidelines for Conservation of Historic Places in Canada but also on applicable provincial legislation, policies, and guidance, including the Ontario Heritage Act, the Provincial Planning Statement, and MCM's Criteria for Evaluating Potential Built Heritage Resources and Cultural Heritage Landscapes.
MCM-06	7.14.2.4.1 Cultural Heritage Screening Page 7-491	<p>The title of section 7.14.2.4.1 should be revised from 'Cultural Heritage Screening' to 'Existing Conditions'. This section should describe the existing baseline cultural heritage conditions within the study area by identifying all known or potential built heritage resources and cultural heritage landscapes, including a historical summary of the study area. The Ministry has developed a screening checklist that may assist with this exercise: Criteria for Evaluating for Potential Built Heritage Resources and Cultural Heritage Landscapes.</p> <p>Paragraph 4 mentions the 40-year threshold to identify properties and landscapes with the potential to have CHVI. While the 40-year threshold identified in paragraph 4 and MCM's checklist may be used as a screening tool, it represents only one indicator of potential cultural heritage value and should be considered alongside other relevant criteria. We recommend revising this paragraph to clarify this.</p> <p>We recommend replacing the last paragraph with the following: The Ministry's Criteria for Evaluating Potential for Built Heritage Resources and Cultural Heritage Landscapes should be completed to help determine whether this project may impact known or potential built heritage resources and/or cultural heritage landscapes.</p> <p>If there is potential for built heritage resources and/or cultural heritage landscapes within the project area, then a Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment should be undertaken for the entire study area.</p>
MCM-07	7.14.2.4.2 Cultural Heritage Evaluation Page 7-492	<p>The title of the section should be revised from 'Cultural Heritage Evaluation' to 'Preliminary Impact Assessment'.</p> <p>The first paragraph should be replaced with: The purpose of a Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment is to identify preliminary potential project-specific impacts on the known and potential built heritage resources and cultural heritage landscapes that have been identified. The report should include a description of the anticipated impact on each known or potential built heritage resource or cultural heritage landscape that has been identified.</p> <p>The CHR-PIA will recommend measures to avoid or mitigate potential negative impacts to known or potential built heritage resources and cultural heritage landscapes. The proposed mitigation measures are to inform the next steps of project planning and design.</p> <p>The 2nd paragraph should clarify whether the Cultural Heritage Report has been submitted to Indigenous communities for review and comment.</p> <p>The second paragraph should be replaced with: Cultural heritage resources are often of critical importance to Indigenous communities. Indigenous communities may have knowledge that can contribute to the identification of cultural heritage resources, and engagement with Indigenous communities includes a discussion about known or potential cultural heritage resources that are of value to them.</p> <p>Indigenous engagement was completed by Great Bear Resources as part of the Project through confidential information provided by local Indigenous Nations through Indigenous knowledge studies has been incorporated as available and the Cultural Heritage Report-Preliminary Impact Assessment has been provided to Indigenous communities for review and comment.</p>
MCM-08	7.14.3 Assumptions and the Use of the Conservation Approach Page 7-492	<p>Section 7.14.3 mentions the 40-year threshold to identify properties and landscapes with the potential to have CHVI. While the 40-year threshold identified in paragraph 4 and MCM's checklist may be used as a screening tool, it represents only one indicator of potential cultural heritage value and should be considered alongside other relevant criteria. We recommend that this paragraph be revised to clarify this.</p> <p>We also recommend that this Section be revised to refer to the <i>Ministry's Criteria for Evaluating Potential for Built Heritage Resources and Cultural Heritage Landscapes</i>, which was completed to determine whether this project may impact known or potential built heritage resources and/or cultural heritage landscapes.</p>
MCM-09	7.14.4 Existing Conditions	<p>We recommend that the following section(s) be revised as follows: 7.14.4 Existing Conditions (Page 7-492)</p>

	<p>Page 7-492</p> <p>7.14.5 Identification of Potential Effects Page 7-493</p> <p>7.14.6 Mitigation and Enhancement Measures Page 7-493</p> <p>7.14.7 Assessment of Changes Page 7-494</p> <p>Table 7.14-1 Assessment Criteria, Indicators and Rationale</p> <p>Table 7.14-2 Potential Interactions of Project Components with Cultural Heritage</p> <p>Table 7.14-3 Mitigation Measures for Changes to Cultural Heritage</p> <p>Figures 7.14-1, 7.14-2, and 7.14-3</p>	<p>We recommend Section 7.14.4 be revised to be consistent with current cultural heritage framework, including terminology and guidance. Please clarify the status of the CHIA within this section. We recommend the following sentence be revised: “Accordingly, per provincial requirements, a CHIA must be prepared at the outset of the detailed design phase of the Project and prior to construction (Appendix P-3).” We note that a CHIA has been completed for Manoomin Field between Unnamed Waterbodies 1 and 2 and recommend that this sentence be revised to “A property-specific CHIA was completed at the outset of detailed design and prior to construction (Appendix P-3).”</p> <p>7.14.5 Identification of Potential Effects (Page 7-493) We recommend Section 7.14.5 be revised to clarify the relationship between identified hydrological effects to CHR 3 and the conclusion that no operational phase effects are anticipated following mitigation to ensure consistency across Sections 7.14.5, 17.14.7, and Table 7.14-2.</p> <p>7.14.6- Mitigation and Enhancement Measures (Page 7-493) Please clarify the methodology used to identify mitigation measures and how potentially affected communities or interested parties have been or will be engaged in any further refinement of the mitigation measures related to impacts on built heritage resources or cultural heritage landscapes.</p> <p>7.14.7 Assessment of Changes (Page 7-493) We recommend that the terminology “demolition” be replaced with “alteration, disturbance, demolition or removal.”</p> <p>Table 7.14-1 Assessment Criteria, Indicators and Rationale MCM recommends Table 7.14-1 be revised to be consistent with current cultural heritage framework, including terminology and guidance. This Section references MCM Info Sheet #5 Heritage Impact Assessment and Conservation Plans (2006) Please clarify if the following reference is applicable. If the property is not provincially owned, referencing the InfoSheet may be appropriate; if it is provincially owned, references should instead be to the <i>Standards and Guidelines for the Conservation of Provincial Heritage Properties</i> and Information Bulletin #3. We also recommend replacing MCM (2006) with applicable provincial/regulatory guidance (e.g., O. Reg. 9/06) and removing the 40-year threshold, as it is only a preliminary screening tool.</p> <p>Table 7.14-2 Potential Interactions of Project Components with Cultural Heritage We recommend that this table be revised to clarify the rationale supporting “No” interaction determinants for operations and closure activities. For example, Section 7.14.5 says hydrology changes from facility water management could affect CHR 3. Additionally, we recommend the following edit: “1. Potential interactions with CHR3 only occur during the early construction phase when the Wild Rice stand must be removed for the Project to proceed will be subject to removal/alteration with mitigation and enhancement measures implemented in accordance with the CHIA.”</p> <p>Table 7.14-3 Mitigation Measures for Changes to Cultural Heritage Please clarify the status of the CHIA within this section. We recommend the following sentence be revised: “A CHIA will be prepared to determine specific mitigation measures to be implemented, such as documentation, salvaging or applying buffer zones, as appropriate.” We note that a CHIA has been completed for Manoomin Field between Unnamed Waterbodies 1 and 2 and this should be reflected within the table.</p> <p>Figures 7.14-1, 7.14-2, and 7.14-3 Please clarify whether there are any provincial Crown lands within the Investigation Area. If yes, please depict the Crown lands in the figures.</p>
MCM-10	Section 7.15 Analysis of Changes to Archaeology Page 7-504	<p>The technical cultural heritage studies (i.e., archaeological assessments) are described in this section. Please note that MCM may have additional comments once it has reviewed these technical studies.</p> <p>We have the following recommendations to clarify or align with the provincial framework:</p> <ul style="list-style-type: none"> • Archaeology as a cultural heritage element has been identified as a pVc in recognition of the interests of government agencies responsible for effective management of these resources and potentially affected Indigenous Peoples and parties that have an interest in resources related to their history and culture. Archaeological resources, as defined by the Provincial Planning Statement (PPS) include artifacts, archaeological sites, and marine archaeological sites, as defined under the Ontario Heritage Act. Cultural heritage resources is inclusive of archaeological resources, built heritage resources, and cultural heritage landscapes.

MCM-11	Section 7.15 Page 7-504	<p>We recommend that the following regulatory commitment be added regarding archaeological resources as part of Section 7.15 of the Impact Statement:</p> <p>“Should previously undocumented archaeological resources be discovered, they may be a new archaeological site and therefore subject to Section 48(1) of the <i>Ontario Heritage Act</i>. The proponent or person discovering the archaeological resources must cease alteration of the site immediately and engage a licensed consultant archaeologist to carry out an archaeological assessment, in compliance with Section 48(1) of the <i>Ontario Heritage Act</i>.</p> <p>The <i>Funeral, Burial and Cremation Services Act, 2002, S.O. 2002, c.33</i> requires that any person discovering human remains must cease all activities immediately and notify the police or coroner. If the coroner does not suspect foul play in the disposition of the remains, in accordance with <i>Ontario Regulation 30/11</i> the coroner shall notify the Registrar, Ontario Ministry of Public and Business Service Delivery and Procurement, which administers provisions of that Act related to burial sites. In situations where human remains are associated with archaeological resources, the Ministry of Citizenship and Multiculturalism should also be notified (at archaeology@ontario.ca) to ensure that the archaeological site is not subject to unlicensed alterations which would be a contravention of the <i>Ontario Heritage Act</i>”.</p>
MCM-12	Section 7.15.2.1.2 Provincial Page 7-505	<p>We note that the terminology employed related to cultural heritage is a combination of federal and provincial regulatory frameworks. However, we have some recommendations to clarify or align with the provincial framework:</p> <p>The Government of Ontario Province recognizes the importance of conserving, protecting, and preserving cultural heritage resources, including archaeological resources, through the <i>Ontario Heritage Act</i> and its associated regulations. The <i>Ontario Heritage Act</i> defines the role and responsibilities of the Ontario Heritage Trust, enables the provincial government to provide standards and guidelines for the conservation of provincial heritage properties, and empowers municipalities and prescribed public bodies to identify, designate, and protect properties or districts of CHVI. The <i>Ontario Heritage Act</i> also outlines the Province’s requirements for archaeological licensing, conducting fieldwork, reporting on assessments, protecting archaeological sites and objects, and maintaining a register of archaeological reports.</p> <p>The MCM is responsible for the administration of the <i>Ontario Heritage Act</i> and has developed checklists, information bulletins, standards and guidelines, and policies to support the conservation of cultural heritage resources. Under the Impact Assessment Act (IAA), the Impact Assessment Agency of Canada has the authority to require technical cultural heritage studies where necessary to determine whether a designated project may cause adverse effects on cultural heritage resources and to inform appropriate mitigation measures. Given that the OHA does not independently trigger studies or issue permits, it is fully appropriate and consistent with Ontario’s regulatory framework for the Agency, under the IAA, to require technical cultural heritage studies—including archaeological assessments when necessary to assess potential impacts.</p> <p>In the case of For archaeology, the MCM also plays a lead role in conserving and protecting archaeological resources and sites in Ontario—regulates archaeology and licenses archaeologists. The ministry reviews archaeological reports as a condition of licensing in accordance with Part VI of the OHA. This review is to ensure that archaeologist has met the terms and conditions of their licence, that the archaeological sites have been identified and documented according to the standards set by MCM and that the archaeological fieldwork and report recommendations ensure the conservation of archaeological resources. The MCM issues licences to qualified individuals—licensed archaeologists to conduct terrestrial and marine archaeological fieldwork on non-federal lands in Ontario, and for each terrestrial archaeological assessment requires and issues a project-specific Project Information Form-(PIF). The MCM also maintains a restricted-access database of registered archaeological sites (the Ontario Archaeological Sites Database) containing records of all archaeological sites documented by the licensed archaeologists in Ontario. MCM advises licenced archaeologists on assessment methods, and reviews marine and terrestrial archaeological reports. When the MCM has deemed a report compliant with the Standards and Guidelines for Consultant Archaeologists (MCM 2011), they issue a letter to licensees, proponents, and approval authorities indicating that the report has been filed in the Ontario Public Register of Archaeological Reports. The letter is copied to the proponent (e.g., ministry or prescribed public body) and the approval authority (e.g., Ministry of the Environment, Conservation and Parks, Impact Assessment Agency of Canada). Approval authorities often rely on the letter to address legislative requirements.</p> <p>During the preparation of the technical studies for the Project, the following MCM documents were used:</p> <p>[..]</p>
MCM-13	Section 7.15.2.3 Assessment Criteria Page 7-507	<p>This Section describes the criteria for evaluating archaeological potential. We recommend replacing Section 7.15.2.3 with the following to align with legislative requirements:</p> <p>This project may impact archaeological resources and should be screened using the Ministry’s Criteria for Evaluating Archaeological Potential and Criteria for Evaluating Marine Archaeological Potential (if shoreline or in-water works are proposed) to determine if an archaeological assessment is needed.</p> <p>If the project area exhibits archaeological potential, then an archaeological assessment (AA) shall be carried out by an archaeologist licenced under the <i>Ontario Heritage Act (OHA)</i>, who is responsible for submitting the report directly to MCM for review.</p>

		Several terrestrial archaeological assessments and a marine archaeological assessment were carried out as part of this project, as the area was found to contain archaeological potential, as five terrestrial archaeological sites are located within the spatial boundaries of the project area.
MCM-14	Section 7.15.2.4.1 Terrestrial Archaeology Page 7-507	This Section describes the terrestrial archaeological assessments undertaken for this project. We acknowledge that Appendix Q-1 (terrestrial archaeology) and Q2 (marine archaeology) have been included as part of Batch 3. We continue to recommend including the Project Information Form (PIF#) in this Section.
MCM-15	Section 7.15.4 Existing Conditions Page 7-507	<p>Our records indicate that a Stage 1 archaeological assessment (AA, under Project Information number PP236-0208-2022) has been carried out for the study area and has been entered into the Ontario Public Register of Archaeological Reports. A Stage 2 archaeological report (AA, under PIF#: P236-0222-2023) has been submitted to MCM and is under review. Additionally, four Stage 3 archaeological assessments (under PIF#s: P236-0222-2023, P236-0240-2024, P236-0241-2024, P236-0242-2024, P236-0244-2024), and a Stage 4 archaeological assessment (under PIF#: P236-0249-2024)-and excavation of archaeological site EfKj-1) were undertaken. The Stage 3-4 AA have yet to be submitted for MCM's review and comment.</p> <p>The Stage 2 AA and any further archaeological assessment (e.g., Stage 3 and 4) should be completed as early as possible in the design phase of the project, before any ground disturbing activities. Please note that archaeological concerns have not been addressed until reports have been entered into the Ontario Public Register of Archaeological Reports. We recommend that this Section be revised to include a summary of findings of the archaeological assessments that have been undertaken, including their associated Project Information Numbers (PIF #s) and the findings of the archaeological studies, and attaching the completed Stage 1-4 AA as an appendix to the IS report. Please indicate that the Stage 2-4 AA are a draft, and the results are considered preliminary at this time.</p> <p>The Stage 2 AA and any further archaeological assessment (e.g., Stage 3 and 4) should be completed as early as possible in the design phase of the project, before any ground disturbing activities. Please note that archaeological concerns have not been addressed until reports have been entered into the Ontario Public Register of Archaeological Reports where those reports recommend that:</p> <p>Please note that archaeological concerns have not been fully addressed until reports have been entered into the Ontario Public Register of Archaeological Reports ('the Register') where those reports recommend that:</p> <ol style="list-style-type: none"> 1. the archaeological assessment of the project area is complete and 2. all archaeological sites identified by the assessment are either of no further cultural heritage value or interest (as per Section 48(3) of the Ontario Heritage Act) or that mitigation of impacts has been accomplished through excavation or an avoidance and protection strategy. <p>Approval authorities should wait to receive MCM's review letter for an archaeological assessment report indicating that the report has been entered into the Ontario Public Register of Archaeological Reports before issuing a decision or proceeding with any ground disturbing activities (e.g., construction staggng and geotechnical drilling).</p> <p>Given the time sensitivity of this project, we recommend either that the proponent contact its licensed archaeologist to submit an expedited review request or that the Impact Statement be revised to indicate that the findings and recommendations of that Stage 2 AA are preliminary until the report is entered into the Register. Another option would be to remove information about that Stage 2 AA and include a commitment that the Stage 2 AA will be completed during the Federal EA process.</p>
MCM-16	Section 7.15.2.4.2 Marine Archaeology Page 7-508	This Section describes the marine archaeological assessments that have been carried out as part of this project. MCM continues to recommend that the License number of the Marine AA be included in Section 7.15.2.4.2.
MCM-17	Section 7.17 References Page 7-534	MCM continues to recommend including the Provincial Policy Statement, 2024 and the Ontario Heritage Act, 1990 within the list of references in Section 7.17.
MCM-18	Appendix P-1: Cultural Heritage Report: Existing MCM is reviewing the Cultural	MCM is reviewing the Cultural Heritage Report and will issue a letter to the proponent and its consultant (copying IAAC). The findings and recommendations of this report should be considered preliminary.

	Heritage Report and will issue a letter to the proponent and its consultant (copying IAAC). The findings and recommendations of this report should be considered preliminary. 9 Comment ID Reference to Impact Statement Views to Inform the Impact Assessment Conditions and Preliminary Impact Assessment	
MCM-19	Appendix P-2: Cultural Heritage Evaluation Report	MCM is reviewing the Cultural Heritage Evaluation Report and will issue a letter to the proponent and its consultant (copying IAAC). The findings and recommendations of this report should be considered preliminary.
MCM-20	Appendix P-3: Cultural Heritage Impact Assessment	MCM is reviewing the Cultural Heritage Evaluation Report and will issue a letter to the proponent and its consultant (copying IAAC). The findings and recommendations of this report should be considered preliminary.
MCM-21	Appendix Q-1 Terrestrial Archaeological Assessments	We continue to recommend that given the the time sensitivity of this project, we recommend either that the proponent contact its licensed archaeologist to submit an expedited review request or that the Impact Statement be revised to indicate that the findings and recommendations of that Stage 2 AA are preliminary until the report is entered into the Register. Another option would be to remove information about that Stage 2 AA and include a commitment that the Stage 2 AA will be completed during the Federal EA process.
MCM-22	Appendix Q-2 Marine Archaeological Assessment	Licensed archaeologists (not proponents) are the ones to submit the archaeological assessments for MCM's review. Archaeologists submit via our PastPortal system. The impact statement indicates that a portion of the project footprint located within a body of water has been evaluated for archaeological potential. We acknowledge that the Checklist for Evaluating Marine Archaeological Potential was completed as part of this undertaking and included, along with supporting documentation within the IS. <i>A Marine Archaeological Assessment and Visual Inspection Report</i> (dated September 2025, prepared by WSP for archaeological licenses 2024-34 and 2025-21 as part of Appendix Q2) has been submitted to the Ministry of Citizenship and Multiculturalism (MCM) for review. Comments have been provided, identifying required revisions. We acknowledge that a revised marine archaeological assessment has been attached as Appendix Q-2 to the report and has been entered into the Ontario Public Register of Archaeological Reports. We continue to recommend that Section 7.15.4 Existing Conditions be revised to reflect new information as applicable and with the attachment of the revised marine archaeological assessment

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
<p><i>Please identify Outstanding Information Requirements by ministry and number.</i></p> <p><i>e.g.: MNR-02</i></p>	<p><i>Identify the specific section of the Impact Statement related to information requirement</i></p>	<p><i>Identify the specific section of the Tailored Impact Statement Guidelines related to information requirement</i></p>	<p><i>Provide a brief description of the outstanding information requirement, including a rationale for how the missing could inform the impact assessment</i></p> <p><i>Include, where relevant:</i></p> <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> 	<p><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></p> <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>
MCM-01	Section 7.1.5 Influence of Consultation on Socio-Cultural pVcs, Page 7-10	12.1.2 (Effects Indigenous physical and cultural heritage - Indigenous physical and cultural heritage, and structures, sites or things of significance)	<p>The Project may impact the cultural heritage of significance to non-Indigenous peoples. Different types of heritage, be it a structure, site or thing, can fall under the authorities of municipal, provincial/territorial or federal governments and sometimes under several of these authorities.</p> <p>Within the Impact Statement, socio-cultural effects are assessed through pathway-linked valued components (pVc), which include cultural heritage and archaeology and are intermediate components that help explain how the federal effect occurs.</p> <p>Effects of any changes to the environment on heritage or any structure, site or thing (other than those with respect to Indigenous peoples) that are directly linked or necessarily incidental to a federal decision shall be assessed. Therefore, the Impact Statement will assess effects of changes to all cultural heritage resources, associated with Indigenous and non-Indigenous communities.</p>	<p>We recommend that this Section be revised to include the following:</p> <ul style="list-style-type: none"> To address the Physical and Cultural Heritage affiliated with Indigenous and non-Indigenous peoples. Identify pVcs which will include an inventory of potential lands and resources and establish their importance as heritage or as a structure, site or thing. <p>The effects of changes to all cultural heritage resources associated with Indigenous and Non Indigenous peoples are documented and assessed through technical cultural heritage studies such as archaeological assessments and Cultural Heritage. Report: Existing Conditions and Preliminary Impact Assessment and should referenced in this section.</p>
MCM-02	Section 7.1.5.2 LSFN and WFN Page 7-11	Section 12.2 (Effects Indigenous physical and cultural heritage Indigenous physical and cultural heritage and structures, sites or things of significance).	<p>Cultural heritage resources are often of critical importance to Indigenous communities. Indigenous communities may have knowledge that can contribute to the identification of cultural heritage resources, and we suggest that any engagement with Indigenous communities includes a discussion about known or potential cultural heritage resources that are of value to them.</p> <p>MCM previously provided comments on the Draft Tailored Impact Statement and Draft Cooperation Plan on June 7, 2024 and has included guidelines that are applicable to MCM's mandate for conservation of cultural heritage.</p> <p>The Tailored Impacts Statement Guidelines require that the proponent demonstrate how Indigenous engagement informs the identification of valued components, the assessment of effects, and the development of mitigation and follow-up measures. However, while the Impact Statement contains a section describing Indigenous engagement activities, it does not demonstrate how issues raised by Indigenous communities will inform the effects assessment, mitigation measures, or follow-up commitments as required by the TISG.</p>	<p>We recommend that Section 7.1.5.2 of the Impact Statement be revised to include the following:</p> <ul style="list-style-type: none"> A description of the nature and current condition of the heritage of any structure, site or thing. Assessment of potential effects on physical and cultural heritage, and structures, sites or things of historical, archaeological, paleontological or architectural significance to indigenous communities. Consideration of potential cumulative effects. <p>Description of the outcomes of engagement and consultation activities with the public and Indigenous communities and indicate the participation of the members of these communities in the related studies (e.g. archaeological studies), if applicable</p>

MCM-03	Section 7.14 Analysis of Changes to Cultural Heritage Page 7-488	Section 12.5 (Mitigation and enhancement measures)	<p>Information under Section 12.5 of the TISG requires that information within the Impact Statement be consistent with Technical Guidance. Mitigation measures for physical or cultural heritage or any structure, site or thing that is of historical, archaeological, paleontological or architectural significance can only be identified by qualified persons and documented in technical cultural heritage studies (e.g. architectural assessments, cultural heritage reports, etc).</p> <p>Mitigation measures respecting cultural heritage resources may include avoidance through project design, protection of built heritage resources and cultural heritage landscapes, Indigenous engagement, and participation, documentation and interpretation and ongoing monitoring and management. Please specify which mitigation measures for built heritage resources or cultural heritage landscapes are applicable to this project in the final IS.</p> <p>It is indicated in Section 7.14.2.12 of the IS that “a Cultural Heritage Impact Assessment (CHIA), or other equivalent study, is to be prepared, identifying specific mitigation measures to be implemented, which may include documentation, salvage, applying buffer zones, and/ or ecological restoration, as appropriate.”</p>	<p>Cultural heritage mitigation measures in a TISG are described in the Mitigation Measures section and must be included in the Impact Assessment.</p> <p>We recommend that Section 7.14 (Analysis Changes to Cultural Heritage) in the Great Bear Impact Statement be revised to clarify what mitigation measures will be undertaken for the known and potential built heritage resources or cultural heritage landscapes.</p> <p>Please also include the finalized CHIA report as an Appendix to the report and include a summary of the recommended mitigation measures within Section 7.14 of the finalized Impact Statement.</p>
MCM-04	Section 7.15 Analysis of Changes to Archaeology Page 7-504 & Section 7.15-2 Mitigation Measures for Changes to Archaeology Page 7-515.	Section 12.5 (Mitigation and enhancement measures)	<p>While archaeological mitigation is regulated under Part VI Ontario Heritage Act, the Impact Statement must describe mitigation measures to support the assessment of potential adverse federal effects.</p> <p>Information under Section 12.5 of the TISG requires that information within the Impact Statement be consistent with Technical Guidance. Mitigation measures respecting physical or cultural heritage or any structure, site or thing that is of historical, archaeological, paleontological or architectural significance can only be identified by qualified persons and documented in technical cultural heritage studies (e.g. architectural assessments, cultural heritage reports, etc).</p> <p>We understand that the Project is anticipated to directly impact archaeological resources, and that a mitigation strategy is being developed to address archaeological resources as mentioned in Section 7.1.5.2 LSFN and WFN, and Table 7.15-2: Mitigation Measures for Changes to Archaeology.</p>	<p>As the project will have a direct impact on archaeological resources, the Impact Statement should properly describe due diligence and include commitments, should archaeological resources be uncovered during construction and operation.</p> <p>We recommend that Section 7.15 (Analysis Changes to Cultural Heritage) of the Great Bear Impact Statement be revised to clarify what mitigation measures will be undertaken for archaeological resources.</p> <p>We recommend further clarification of the archaeological mitigation measures that will be carried out including the stages and timelines further in these sections such as the completion of pre-construction, archaeological assessments, construction monitoring, chance find procedures, Indigenous participation, and regulatory review and acceptance prior to any ground disturbance.</p>

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
Please identify advice by ministry and	Identify the section of the Impact Statement to	List the potential approval or relevant legislative framework	<ul style="list-style-type: none"> Describe information needed to determine if the provincial approval is required. Identify if the Impact Statement could be sufficient to complete the permitting process. If not, briefly describe what is needed next. Advise how the Proponent can coordinate regulatory requirements with the remainder of the impact assessment process to streamline approvals. Describe environmental outcomes of the regulatory framework and how they are achieved such as regulations or enforceable conditions.

number. e.g.: MNR-03	which your comment applies.		<ul style="list-style-type: none"> 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.
MCM-01	Section 7.15.4 Existing Conditions, Page 7-509 to 7 510 & Appendix Q1- Terrestrial Archaeological Assessment	Part VI, Ontario Heritage Act Standards and Guidelines for Consultant Archaeologists	<p>Please refer to comments MCM-15 and MCM-16 in Table 1 above.</p> <p>Under the <i>Impact Assessment Act</i> (IAA), the Impact Agency of Canada has the authority to require technical cultural heritage studies where necessary to determine whether a designated project may cause adverse effects on cultural heritage resources and inform appropriate mitigation measures.</p> <p>Based on the anticipated direct impacts to archaeological resources, MCM's review and entry of the reports into the Ontario Public Register of Archaeological Reports will be required before construction. The Impact Statement does not replace the requirements under Part VI of the <i>Ontario Heritage Act</i> and associated provincial requirements. Archaeological work may be coordinated with subsequent project phases to support regulatory efficiency, subject to review by the MCM.</p>
MCM-02	Section 7.15.4 Existing Conditions, Page 7-509 Appendix Q2- Marine Archaeological Assessment	Part VI, Ontario Heritage Act	<p>Please refer to comment MCM-20 in Table 1 above.</p> <p>Under the <i>Impact Assessment Act</i> (IAA), the Impact Agency of Canada has the authority to require technical cultural heritage studies where necessary to determine whether a designated project may cause adverse effects on cultural heritage resources and inform appropriate mitigation measures.</p> <p>Based on the potential for direct impacts to marine archaeological resources, MCM's review and entry of the reports into the Ontario Public Register of Archaeological Reports is required prior to any construction. The Impact Statement does not replace the requirements under Part VI of the Ontario Heritage Act and associated provincial requirements. Marine archaeological work may be coordinated with subsequent project phases and subject to review by MCM.</p>
MCM-03	Appendix P-1 Cultural Heritage Report and Preliminary Impact Assessment, Executive Summary, Page. ii, & Section 6, Page 28 Appendix P-2 Cultural Heritage Evaluation Report Executive Summary, p. ii, and Section 8, Page 6 Appendix P-3 Cultural Heritage Impact Assessment	Ontario Heritage Act	<p>MCM is reviewing the Cultural Heritage Report and Preliminary Impact Assessment and will issue a letter to the proponent and its consultant (copying IAAC). The findings and recommendations of this report should be considered preliminary.</p> <p>Considering that the OHA does not independently trigger studies or issuance of permits, it is fully appropriate and consistent with Ontario's regulatory framework for the Agency under the IAA to require technical cultural heritage studies, including Cultural Heritage Reports, Cultural Heritage Evaluation Reports, and Heritage Impact Assessments, when necessary to assess potential impacts.</p>

Please insert additional rows as necessary.