

**Ministry of Citizenship
and Multiculturalism**

Heritage Planning Unit
Heritage Operations Branch
Citizenship, Inclusion and
Heritage Division
16th Flr, 56 Wellesley St W
Toronto, ON M5S 2S3
Tel.: 437.240.2379

**Ministère des Affaires civiques
et du Multiculturalisme**

Planification relative au patrimoine
Opérations relatives au patrimoine
Division des affaires civiques, de
l'inclusion et du patrimoine
16e étage, 56 rue Wellesley Ouest
Toronto, ON M5S 2S3
Tél.: 437.240.2379



June 8, 2026

EMAIL ONLY

Amy Sen
A/Director, Ontario Region
Impact Assessment Agency of Canada
600-55 York Region
Toronto, ON M5J 1R7
GreatBear@iaac-aeic.gc.ca

MCM File : **0018673**
Proponent : **Great Bear Resources Ltd. (subsidiary of Kinross Gold Corp.)**
Subject : **Impact Statement (Batch 3)**
Project : **Great Bear Gold Project**
Location : **Kenora District, ON**

Dear Amy Sen:

Thank you for your letter dated April 14, 2026, requesting review of Batch 3 of the Impact Statement for the Great Bear Gold Project and the two enclosure forms. We understand that these materials are intended to support project planning and impact assessment in accordance with requirements under the *Impact Assessment Act*.

MCM's interest in this project relates to its mandate of conserving Ontario's cultural heritage, which includes:

- archaeological resources, including land and marine;
- built heritage resources, including bridges and monuments; and
- cultural heritage landscapes.

Project Summary

Kinross Gold Corporation is proposing the construction, operation, decommissioning and abandonment of a new open-pit and underground gold mine with an on-site metal mill, located 23 kilometres southeast of Red Lake, Ontario. As proposed, the Great Bear Gold Project would include two open pits and produce up to 60,000 tonnes of ore per day, while the metal mill would process up to 15,000 tonnes of ore per day. The project would operate for about 20 years.

On August 1, 2024, the Impact Assessment Agency of Canada (IAAC) commenced an impact assessment pursuant to the Impact Assessment Act for the Great Bear Gold Project. IAAC has issued the following documents to the proponent to guide the development of the Impact Statement and the conduct of the impact assessment for the project: Tailored Impact Statement

Guidelines, Indigenous Engagement and Partnership Plan, Public Participation Plan, Cooperation Plan and Permitting Plan.

On February 17, 2026, the Ontario government announced that it has designated the Kinross Gold Corporation's Great Bear Project under the 'One Project, One Process' (1P1P) framework. Technical cultural heritage studies will also support requirements under the 1P1P process.

Comments

On February 18, 2026, MCM commented on Batch 2 of the draft Impact Statement and, on March 25, 2026, on technical cultural heritage studies (Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment (CHR-PIA), Cultural Heritage Evaluation Report (CHER) and Heritage Impact Assessment (HIA) for Manoomin Field).

We have reviewed the following documents submitted on April 14, 2026:

- *Great Bear Gold Impact Statement* dated March 31, 2026, prepared by WSP
- *Great Bear Gold Project Impact Statement Summary* dated April 9, 2026, prepared by WSP
- *Enclosure Form 1: Provincial Authority Advice record for the Impact Statement*
- *Enclosure Form 2: Project Context and Targeted Questions for Government Review*

MCM has the following comments:

Enclosure 1: Provincial Authority Advice Record for the Impact Statement (sent on April 14)

The previous comments provided on February 18, 2026, related to *Enclosure 1: Provincial Authority Advice Record for the Impact Statement* to IAAC have yet to be addressed and remain applicable. The primary recommended revision to Table 1 (Comment MCM-09) has not been made.

Additionally, the technical cultural heritage studies included as Appendix P1, P2, and P3 (CHER, HIA, and CHR-PIA) are not up to date and should reflect comments and recommendations made by MCM, Indigenous communities, and other interested parties.

Enclosure 2: Project Context and Targeted Questions for Government Review Batch 3 (sent on April 14)

- *Physical and cultural heritage and structures and sites of historical, archaeological, paleontological or architectural significance (MCM, ISC) – Page 12*

5. Is there sufficient information to predict effects to physical and cultural heritage, and structures and sites of historical, archaeological, paleontological or architectural significance?

We find that the Impact Statement provides an adequate baseline for identifying known and potential cultural heritage resources and contains sufficient information to predict effects to physical and cultural heritage and structures and sites of historical, archaeological, paleontological, or architectural significance.

MCM notes that a Stage 1 Archaeological Assessment (AA, Project Information Form (PIF) # P236-0208-2022) and a Marine Archaeological Assessment (License No. 2024-34 and 2025-21) have been completed and entered into the Ontario Public Register of Archaeological Reports maintained by MCM, and no further marine archaeological work was recommended within the study area. Our records indicate that a Stage 2 AA (PIF) # P236-0222-2023) is currently under review by MCM, while Stages 3 and 4 AAs have yet to be reviewed by MCM.

MCM acknowledges that technical cultural heritage studies including CHR-PIA, Cultural Heritage Evaluation Report (CHER), and Heritage Impact Assessment (HIA) have been prepared to assess effects to physical and cultural heritage. We note that the revised reports were sent to MCM for review and comment on May 27, 2026. The findings of these reports should be considered preliminary until Indigenous communities are provided the opportunity to review and comment.

The effects assessment concludes that there are no residual effects on archaeological sites that will be avoided by the project. MCM cannot confirm this as the archaeological assessments have yet to be reviewed and entered into the Register. However, the IS reflects the finding that there are residual impacts to cultural heritage landscapes, including the permanent loss of a culturally significant wild rice area (CHR-3, also known as Manoomin Field) and potential indirect effects on culturally important areas such as the Chukuni River.

The proposed mitigation measures are generally appropriate and aligned with current legislative requirements. MCM recommends that these measures be further supported by completion of additional archaeological assessments and by implementation of the recommendations made in the supporting technical cultural heritage studies.

- ***Have provincial guidelines been followed for cultural and archaeological assessments?***

MCM finds that the technical cultural heritage studies, including the archaeological assessments undertaken in support of the Impact Assessment, are generally consistent with applicable provincial guidelines.

Thank you for the opportunity to the Great Bear Impact Statement. If you have any questions or any of the above or the detailed comments found in the attached table require clarification, please do not hesitate to contact Karla Barboza, Team Lead, Heritage Planning Unit, at karla.barboza@ontario.ca or me.

Sincerely,

Anastasia Abrazhevich
Heritage Planner
anastasia.abrazhevich@ontario.ca

Copied to:

Ian Martin, Team Leader, Ontario Region, IAAC
Dietrich MacRae-Maahs, Project Manager, Great Bear Gold Project, IAAC
Caitlyn Tindale, Director, Heritage Operations Branch, MCM
James Hamilton, Manager, Heritage Planning Unit, MCM
Karla Barboza, Team Lead, Heritage Planning Unit, MCM

It is the sole responsibility of proponents to ensure that any information and documentation submitted as part of their EA report or file is accurate. The Ministry of Citizenship and Multiculturalism (MCM) makes no representation or warranty as to the completeness, accuracy or quality of the any checklists, reports or supporting documentation submitted as part of the EA process, and in no way shall MCM be liable for any harm, damages, costs, expenses, losses, claims or actions that may result if any checklists, reports or supporting documents are discovered to be inaccurate, incomplete, misleading or fraudulent.

Should previously undocumented archaeological resources be discovered, they may be a new archaeological site and therefore subject to Section 48(1) of the *Ontario Heritage Act*. 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 *Ontario Heritage Act*.

The *Funeral, Burial and Cremation Services Act, 2002, S.O. 2002, c.33* 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 *Ontario Regulation 30/11* 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 *Ontario Heritage Act*.