



**Regional Councillor
For the Northwestern Ontario Métis Community**

May 29, 2026

Dietrich MacRae-Maahs

Project Manager

Great Bear Gold Project

Impact Assessment Agency of Canada

Sent via email:

greatbear@iaac-aeic.gc.ca

Dear Dietrich MacRae-Maahs:

**Re: Northwestern Ontario Métis Community's Review of Kinross Gold Corporation's
Impact Statement for the Great Bear Gold Project**

This letter is submitted to the Impact Assessment Agency of Canada ("**IAAC**") by the Northwestern Ontario Métis Community ("**NWOMC**"). On April 14, 2026, IAAC began a 45-day comment period for the Impact Statement submitted by Kinross Gold Corporation ("**the Proponent**"; "**Kinross**"), for the Great Bear Gold Project (the "**Project**"), having determined that the Impact Statement met the necessary requirements for the conduct of the impact assessment. The NWOMC completed a technical review of the Impact Statement with a focus on determining the adequacy of the Proponent's assessment of impacts of the Project to the NWOMC's s. 35 rights.

In general, the NWOMC's review found several discrepancies between the Impact Statement conclusions and the NWOMC's Traditional Knowledge and Land Use Study ("**TKLUS**") conclusions. Additional consideration of the NWOMC's rights and perspectives, as well as additional mitigation measures, should be incorporated into the Impact Statement to address the discrepancy. This letter summarizes: (1) the NWOMC's comments on the Impact Statement, and (ii) the NWOMC's proposed additional mitigation measures.

The NWOMC engaged MNP LLP to conduct a review of the Impact Statement and the draft Closure Plan. Below is a summary of key comments, along with the following enclosures:

Appendix A – NWOMC Comments on the Impact Statement

Appendix B – Proposed Additional Mitigation Measures

NWOMC is submitting a second letter with comments on the draft Closure Plan along with:

Appendix C – NWOMC Review Comments on the draft Closure Plan

A summary of NWOMC's comments is included below.

NWOMC Comments on the Impact Statement

While the Impact Statement is comprehensive overall, the NWOMC has some outstanding concerns. These concerns are summarized below and detailed comments are set out in **Appendix "A"**.

Use of NWOMC TKLUS

The Impact Statement acknowledges that not all valued components in the NWOMC TKLUS were assessed in the Impact Statement (see Appendix A for specific references). The NWOMC requests that the Proponent ensure that all valued components from the NWOMC TKLUS are assessed in the impact assessment.

The major deviation from the TKLUS is in how the impacts are characterized in the Impact Statement versus the TKLUS. The Proponent has rated the magnitude of effect on Current Use of Lands and Resources for Traditional Purposes, for example, as "low" and restricts the impacts to the Local Study Area. This, along with the other residual effects criteria (also classified as Level I or Level II), means the residual effects are deemed 'not significant'. This varies from the NWOMC TKLUS, which identifies three resource-based categories as "Very Significant" and two resource-based categories as "Significant". This discrepancy should be reconciled.

Groundwater

Groundwater was noted to have no usage identified for general consumption. Therefore, this aspect of groundwater was not fully assessed. This may be of importance to the NWOMC as Water, Watersheds, Rivers and Streams were selected as a valued component for the NWOMC TKLUS and there is reference to use of the waters within the Project Area.

Additionally, changes in groundwater flows and levels are not addressed by the Proponent until the closure phase. This means that, until closure, some impacts to groundwater will persist for approximately 26 years. While the impacts are managed through mitigation, the Proponent should ensure that effective monitoring is undertaken, with sufficient participation from the NWOMC, to confirm the conclusions of the Impact Statement.

Surface Water and Fish Habitat

This section of the Impact Statement specifies that Watercourse 1, Watercourse 3, Watercourse 8B, Waterbody 1, and Waterbody 2 will be permanently altered (overprinted). This permanent alteration will result in fish habitat offsetting and compensation at Waterbody 6 and a new pond complex within the Dixie floodplain.

When evaluating the *Fisheries Act, Paragraph 35(2)(B) Authorization, Offset Plan and MDMER Schedule 2 Fish Habitat Compensation Plan Draft* the approach listed illustrates a no net loss approach (21.74 ha replaced with 25.21) instead of a net gain approach. A net gain approach aims to increase habitat productivity and overall biodiversity. The NWOMC seeks engagement with the Proponent regarding offset increases and the MDMER plans.

Dust Suppressants

In the Air Quality section, the Impact Statement notes that chemical dust suppressants will be used on roads where appropriate. Within the vegetation section, the Impact Statement further notes that dust suppressants, in general, will be used on both roads and mineral stockpiles.

While the use of chemical dust suppressants was not included in the NWOMC TKLUS, it has been raised in past regulatory processes as an item of concern as it can impact the food chain, Métis citizens' perceptions of food safety, and increase overall avoidance of areas near application. The NWOMC seeks engagement with the Proponent regarding the use of dust suppressants.

Wild Rice

Wild rice is considered as its own pathway valued component with linkages to Indigenous interests. This component was considered in terms of abundance and quality. Wild rice will be removed in the Project Area.

To address this impact, the Proponent has proposed a Wild Rice Enhancement Project to compensate for the loss. The locations of compensation are proposed on the Lac Seul First Nation reserve. Within the NWOMC TKLUS, it is noted that there are two wild rice harvesting locations utilized by Métis harvesters within the Study Area identified for the TKLUS. The NWOMC seeks further engagement with the Proponent to understand how the Proponent will compensate for the loss of wild rice in the Project Area.

Pathway Valued Components

The pathway valued components do not include a residual effects determination or significance rating, in contrast with the federal valued components which do. This is because the pathway valued components are meant to "...provide a pathway through which the Project may affect fVCs".¹

While the Impact Statement does include sufficient details to draw the conclusion that pathway valued components do not have residual effects and are not significant, for consistency and clarity, this consideration could be included in future iterations of the Impact Statement.

Methylmercury Contamination

Methylmercury contamination was noted as a key concern from Indigenous communities in the Impact Statement. To address this, the Proponent developed a specific Mercury Study Plan to monitor mercury through the English River system (included as Appendix T) and overall changes to human health (included as Appendix N).

The work on methylmercury also considered SO₄ loading and how this can increase methylmercury bioaccumulation in fish tissue and potentially impact human health where fish consumption is significant. To date, the findings are that methylmercury is very low in the Chukuni River and Pakwash Lake. Modelling has been completed on twenty-three waterbodies and the calculated mercury levels in these waterbodies align with literature-reported ranges. The NWOMC seeks engagement with the Proponent on the ongoing Mercury Study Plan to ensure the NWOMC is adequately included and informed as this progresses.

¹ Great Bear Resources, Great Bear Gold Project Impact Statement, Page 1-11 (PDF Page 18)

Health Impact Assessment

The Health Impact Assessment characterizes reduced harvesting as being a result of “perceived contamination” or “avoidance behavior”. This characterization contrasts with some findings within the NWOMC TKLUS whereby harvesters stated that they will not return to impacted areas; fishers note they will relocate away from the Pakwash and Chukuni-connected waters; and plant gatherers may abandon preferred highway 105 locations.

Further, the Health Impact Assessment relies heavily on the First Nations Food, Nutrition and Environment Study and has limited information on Métis. This is important as there may be different avoidance thresholds for Métis citizens. This methodological gap should be considered by the Proponent in consultation with the NWOMC.

Finally, the NWOMC TKLUS includes details on Métis governance, management, stewardship, and decision-making authority over land. These aspects are acknowledged within the Health Impact Assessment, but are not considered as determinants of health and are, therefore, not carried forward for consideration in relation to mental health or stress. The NWOMC TKLUS specifically notes that the loss of a stewardship role can be linked to harvesters’ loss of purpose on the land and can result in intergenerational disconnect.

The NWOMC seeks engagement with the Proponent to ensure consideration of these impacts.

NWOMC Proposed Additional Mitigation Measures

The NWOMC anticipates that many of its concerns can be addressed by the Proponent through its provision of substantive responses to the concerns raised above, and future engagement in the impact assessment and permitting/authorization processes. Other concerns can be addressed by implementing additional mitigation measures. A list of the NWOMC’s proposed mitigation measures is set out in **Appendix “B”**.

Closing

The NWOMC has provided information about the NWOMC’s rights and perspectives to the Proponent throughout the federal impact assessment process. While some of this information has been incorporated into the Impact Statement, the NWOMC requests that the information and comments summarized above and detailed in Appendix “A” below be addressed by the Proponent through substantive responses and additional engagement with the NWOMC, prior to the conclusion of the impact assessment. The NWOMC also seeks to further engage with the Proponent on the implementation of the additional mitigation measures set out in Appendix “B”.

We trust that the NWOMC’s comments in this letter will be considered by the Proponent to support the protection of the NWOMC’s rights while promoting a continued positive relationship between the Proponent and the NWOMC.

Sincerely,

<original signed by>

Theresa Stenlund

Regional Councillor for the Northwestern Ontario Métis Community and Chair of the Treaty 3, Lake of the Woods/Lac Seul, Rainy Lake/Rainy River Consultation Committee

cc Treaty 3/Lake of the Woods/Lac Seul/Rainy Lake/Rainy River Traditional Territory
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